

Urgency of Indonesia to Establish a Comprehensive COVID-19 Pandemic Law: Lesson Learned from Singapore

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DOI: <http://dx.doi.org/10.18196/iclr.v14i1.12999>

Abstract

Indonesia, during the second wave of COVID-19 has become one of the country that was deemed to have had the highest COVID-19 cases and death rate similar to India, Iran, and Italy in 2020. Despite the low number of cases Indonesia currently have, the dismissive approach of the Indonesian government and the late response towards COVID-19 on the early days was some of the root of the issues. This tragedy could have been avoided if the Indonesian government act in a serious and efficient manner. This study seeks to create a solution or as a mirror for the Indonesian government in creating a comprehensive pandemic laws. Singapore, arguably have been successfully implementing the “living with COVID-19” Indonesia wished to achieve in mid-2020 during the “new normal” attempt. This study concludes that Indonesia could attain that standard under the condition that Indonesia have a strategic plan such as implemented by Singapore at the moment through gradual exit strategy and high vaccination rates. In preparing for the third wave, Indonesia could also mirror the pandemic laws application in Singapore in the early days where lockdown was stricter and penalty was not lax. This study hopes that if in the worst scenario Indonesia is attacked by third wave of COVID-19 cases, Indonesia will be ready to tackle such challenges by learning some measures implemented by the Singapore government.

Keywords: COVID-19; pandemic measures; pandemic laws

1. Introduction

On early December, 2019, there has been a suspicion of an existence of zoonotic spill over in Wuhan Seafood Market which would then be proposed as an origin of SARS-CoV-2 or more colloquially known as COVID-19 disease or coronavirus 2 (Huang et al., 2020, p. 497-506). This suspicion manifested into a real threat once 41 patients admitted to hospital in Wuhan as of January, 2020 and the laboratory test result has positively confirmed the 2019-nCoV (hereinafter as ‘COVID-19’) infection (Huang et al., 2020, p. 498; Wenyang et al., 2020, p. 364-370). These patients are experiencing the most common COVID-19 symptoms including fever, cough, fatigue or myalgia, and dyspnoea or shortness of breath linked to pneumonia like symptoms (Huang et al., 2020, p. 500).

It took less than three months for the severity and high rate of transmission of COVID-19 to impact the world, this resulted World Health Organization (hereinafter as 'WHO') declared the COVID-19 as a global pandemic on March 11, 2020 (Cucinotta & Vanelli, 2020, p. 157-160). In the span of 2 years, COVID-19 has become a global threat with high level of transmission. As of the writing of this article, 29 September 2021, COVID-19 have infected 232,636,622 people worldwide and resulted in 4,762,089 deaths (WHO, 2021). COVID-19 has infected millions of people worldwide and resulted in health crisis and financial crisis in many countries, global health crisis (Liu et al., 2020). Many countries take turns on experiencing the highest COVID-19 wave in their respective countries, including Indonesia. USA, India, Italy, United Kingdom, and many countries has experienced national collapse of the healthcare system due to first, second, and even third wave of the COVID-19 cases (CGTN, 2021; Ellis-Petersen, 2021; CGTN, 2020).

This has shown the collapse the global health system and the overwhelming needs to handle COVID-19. In order for the global health system to recover, countries are expected to impose strict measures and legal response including pandemic law during the COVID-19 emergency (Liu et al., 2020).

Despite the current COVID-19 situation in Indonesia that has calmed down after reaching its peak of COVID-19 cases in July 2021 (Budiman, 2021), early responses and handling of COVID-19 in Indonesia was chaos. Indonesian government late response to the COVID-19 health crisis has costed the lives of Indonesian population (Olivia et al., 2020). In the early stages of COVID-19, stakeholders even the ones from governmental agencies downplay COVID-19 through their media statements. One of the stakeholder is Terawan Agus Putranto, former Minister of Health of Indonesia stating that Indonesians should not be panic with COVID-19, to just enjoy, and just pray to not get Infected with COVID-19 (News Desk (Ed), 2020). Another minister, Luhut Pandjaitan, Minister of Coordinator of Maritime and Investment, states that COVID-19 would not survive in the tropical climate, due to Indonesia being located in the equator line (Tim detikcom, 2020).

The government actions and attitude towards COVID-19 in the early cases are among many different variables resulting to the failure of imposing the COVID-19 policies in Indonesia. People are informed with different news and information every day, resulting a mixed message among Indonesians on COVID-19 (Nugroho & Syarief, 2021, p. 113). The stakeholders also reject and dismissed an academic report made by Harvard University researchers that implies Indonesia didn't have many cases due to many unreported case. Rather than reflecting on the internal situation, Indonesian stakeholder stated that such report is an insult to Indonesia (Budiman, 2021). The policies made by Indonesian government from the early COVID-19 cases in March 2021 to mid-2021 was also deemed ineffective due to lack of consistency and enforcements.

Therefore, considering all the factors above, Indonesia shall look into and learned the perspective of another state on their COVID-19 approach. One of the country that has successfully been deemed as a pioneer on having a successful implementation on their pandemic law is Singapore. Singapore has had one of the lowest death rate in comparison to other countries, especially in Southeast Asia, with the current COVID-19 total death of 93 as of this writing (Worldometers Team, 2021). Meanwhile, Indonesia's COVID-19 death toll takes up to 141,826 as of this writing (Worldometers Team, 2021). This article hopes that by seeking a benchmark from another country can help Indonesia to increase its quality on dealing with COVID-19 and to face pandemic law in the future.

2. Discussion and Analysis

2.1. COVID-19 Pandemic impact to Indonesian regulation and society

2.1.1. COVID-19 pandemic to the Indonesian regulations

Indonesia is a country which based on and guided by the ideology of Pancasila. As a *Philosophische Grondslag* or the nation philosophy (Sukarnoputri, 2021). Pancasila is manifested through every aspect of living in Indonesia, including within the public health sectors. As prescribed within the fifth article in Pancasila, social justice for every Indonesian citizen, required Indonesia as a State to protect individual and community rights (Undang-undang 1945; Mustaqim, 2016). These rights are including the human rights prescribed within the Universal Declaration of Human Rights and International Covenant on Economic, Social, and Cultural Rights 1966 (Universal Declaration of Human Rights; International Covenant on Economic, Social, and Cultural Rights 1966), specifically on the right to health in accordance to the international standards which was guided by the United Nations Human Rights Council (United Nations Human Rights Office of the High Commissioner). Indonesian pandemic regulations shall also adhere to what Pancasila prescribed, specifically on the fifth article. Indonesian government responds through the enactment of several of the newly established regulations to fulfil their responsibility to protect the citizen rights as prescribed within the Pancasila. The public health right of Indonesian citizen during the COVID-19 period is regulated under several central regulation.

The first change to Indonesian regulations during the COVID-19 pandemic is the creation of Government Regulation No. 21 of 2020 on Large Scale Social Restrictions to Accelerate the Mitigation of Coronavirus Disease 2019 (COVID-19) or more colloquially known as PSBB (*Pembatasan Sosial Berskala Besar*) (Government Regulation No. 21 of 2020). Through the enactment of the Government Regulation No. 21 of 2020, Indonesian Government issued the restrictions for Indonesians on certain activities within the area infected with COVID-19 (Government Regulation No. 21 of 2020, art. 1). The purpose of this regulations is to prevent the spread of the COVID-19 pandemic in Indonesia (Government Regulation No. 21 of 2020, art. 1). Despite the already existing regulation on pandemic, COVID-19 pandemic still hugely impact the Indonesian regulations and legal system by way of the constant enactment of regulations on pandemic. The regulation on pandemic is contained within Law No. 4 of 1984 concerning Outbreaks of Infectious Diseases, this regulation serves as a renewable for Law No. 7 of 1968 concerning Amendments to Article 3 of Law No. 6 of 1962 concerning Plagues and Law No 6. of 1962 concerning the Plague (Law No. 4 of 1984; Law No. 7 of 1968; Law No. 6 of 1962). These regulations were established and renewed for the last time in the 1984, therefore relying on Law No. 4 of 1984 alone would not be sufficient for Indonesian government to tackle the spread of COVID-19 in Indonesia.

Aside from the Government Regulation No. 21 of 2020, Indonesian Government also enacted several regulations to contain the spread of COVID-19 pandemic in Indonesia. The regulations are including Minister of Health Regulation No. 9 of 2020 concerning Guidelines for Large-Scale Social Restrictions for Acceleration of Corona Virus Disease 2019 (COVID-19), Presidential Decree No. 12 of 2020 concerning the Determination of the Non-Natural Disaster of the Spread of Corona Virus Disease 2019 (COVID-19) as a National Disaster, Presidential Regulation No. 99 of 2020 concerning Vaccine Procurement and Vaccination Implementation in light of the Corona Virus Disease 2019 (COVID-19) Countermeasures, Instruction of the Minister of Home Affairs No. 1 of 2021 concerning Implementation of the Activities

Restrictions to Control the Spread of Corona Virus Disease 2019 (COVID-19), Instructions of the Minister of Home Affairs No. 2 of 2021 concerning the Extension of Social Activities Restrictions to Control the Spread of Corona Virus Disease 2019 (COVID-19), Minister of Health Regulation No. 10 of 2021 concerning the Implementation of Vaccination in the Management of the Corona Virus Disease Pandemic 2019 (COVID-19), Instruction of the Minister of Home Affairs No. 5 of 2021 concerning the Implementation of Restrictions on Micro-based Community Activities and Optimizing Corona Virus Handling in the Village and Ward Stage for the Countermeasure of Corona Virus Disease 2019 (COVID-19) Spread, Instruction of the Minister of Home Affairs No. 6 of 2021 concerning the Extended Implementation of Limitations on Micro-based Community Activities and Optimizing the Center for Corona Virus Disease 2019 (COVID-19) Handling in the Village and Ward Stage to Contain the Spread of Corona Virus Disease 2019, Instructions of the Minister of Home Affairs No. 13 of 2021 concerning the Extended Implementation of Limitations on Micro-based Community Activities and Optimizing the Center for Corona Virus Disease 2019 (COVID-19) Handling in the Village and Ward Stage to Contain the Spread of Corona Virus Disease 2019, Instruction of the Minister of Home Affairs No. 7 of 2021 concerning Extended Implementation of Limitations on Micro-based Community Activities and Optimizing the Centre for Corona Virus Disease 2019 (COVID-19) Handling in the Village and Ward Stage to Contain the Spread of Corona Virus Disease 2019, Instruction of the Minister of Home Affairs No. 09 of 2021 concerning the Extended Implementation of Limitations on Micro-based Community Activities and Optimizing the Centre for Corona Virus Disease 2019 (COVID-19) Handling in the Village and Ward Stage to Contain the Spread of Corona Virus Disease 2019, Minister of Health Regulation No. 16 of 2021 concerning the Implementation of Vaccine Procurement in the Management of the Corona Virus Disease Pandemic 2019 (COVID-19), Instruction of the Minister of Home Affairs No. 10 of 2021 concerning the Extended Implementation of Limitations on Micro-based Community Activities and Optimizing the Centre for Corona Virus Disease 2019 (COVID-19) Handling in the Village and Ward Stage to Contain the Spread of Corona Virus Disease 2019, Instruction of the Minister of Home Affairs No. 11 of 2021 concerning Extended Implementation of Limitations on Micro-based Community Activities and Optimizing the Centre for Corona Virus Disease 2019 (COVID-19) Handling in the Village and Ward Stage to Contain the Spread of Corona Virus Disease 2019, and a series of regulations established to contain the spread of the COVID-19 pandemic. The last central regulation enacted was the Instruction of the Minister of Home Affairs No. 13 of 2022 concerning the Implementation of Restrictions to Community Activities Level 4, Level 3, and Level 2 Corona Virus Disease 2019 in the Jawa and Bali Region.

As established above, the Indonesian regulation was severely impacted due to the ever-changing nature of the virus. Regulations on social restrictions, vaccination programs, mobility are impacted by COVID-19 which results in the constant renewal of the regulations. Despite the creation of many central regulations, such enactments of Government Regulations, Presidential Regulations, and Minister Instructions, the variations of COVID-19 made the government should also adjust its policy whether to make it stricter or lax. There has been several critics on the uncertainty of the Social Restrictions Regulations in Indonesia which result in people being confused to the update of such regulations in the first place (Smeru Research Institute, 2020).

2.1.2 COVID-19 impact to the Indonesian society

During the early phase of COVID-19, there had been a trend of cognitive dissonance of coming from not only from the government but also the society in Indonesia (Subagyo &

Irwansyah, 2021). This example can be seen through the instructions of the government to boost tourism by way of providing funds to influencer even during the outbreak of COVID-19 pandemic in other countries (Gorbiano, 2020), this was noted less than 2 weeks before the announcement of the first COVID-19 case in Indonesia. Within the society there has also been a perception of certain bias, information, cultures, and unique belief which results in the lack of trust towards the government and the existence of COVID-19 (Subagyo & Irwansyah, 2021). However with the government efforts to curb the virus through many social restrictions regulations on COVID-19 pandemic, the Indonesian society are obliged to adhere to such regulations and society starts to take part in raising awareness and starting initiatives such as volunteering to spread masks and health attributes (Pinariya et al., 2021).

Moreover, Indonesian society was also impacted in their economy (Smeru Research Institute, 2021). This especially happens on the vulnerable groups. Not only the vulnerable groups but also households that were secure economically in their ability to garner their income were also potentially become poor or have turned into poverty due to significant loss of income during the COVID-19 pandemic (Smeru Research Institute, 2021). Aside from the household economy, there are other sectors that is impacted by the COVID-19 pandemic. The example of such sectors is tourism, it has been noted that the loss of Indonesian tourism is up to \$3.2 billion in 2020 in comparison to the state income from tourism in 2019 (Restikadewi et al., 2021). However, despite the negative impact of COVID-19, Indonesia has begun its path to economic recovery which results in a stable growth of Indonesian economy at 5,01% in the first quarter of 2022 (Bank of Indonesia, 2022).

2.2. The urgency of Indonesia to implement comprehensive pandemic law in light of COVID-19 Pandemic

2.2.1. Indonesian government response on the COVID-19 Pandemic

Joko Widodo, Indonesian President first confirmed the COVID-19 in Indonesia on March 2, 2020 by announcing two confirmed COVID-19 case within the country (World Health Organization, 2020). The COVID-19 cases has since gradually increased as it reached its peak on 15th of July 2021 where 56,757 daily cases reported and on the 12th of July 2021 where 350,273 weekly cases reported to World Health Organisation. Indonesian government has been criticised for its slow response towards COVID-19 Pandemic which has caused havoc on the following months after the first case was announced (Ayuningtyas et al., 2021), the surge of cases overflowing the country and have cause not only first and second wave but also third wave which was infested by the newly existing COVID-19 variant namely the delta variant, resulting Indonesia becoming Indonesia as Asia's epicentre for COVID-19 (Widianto & Diela, 2021). Due to the surge of delta variant in Indonesia, hospitals in Java were overwhelmed by the number of COVID-19 patients and hospitals are experiencing shortages on oxygen supplies and ventilators (Chew, 2021). As of the writing of this paper, the number of cases in Indonesia have dropped significantly, Indonesia's success in curbing the virus is attributed to the Indonesia's strict measures to curb the virus through the strict social restrictions, implementing health protocols, as well as nation-wide vaccination (Muthiariny & Afifa, 2021). However, Indonesia's path to this downward trend and curve flattening has not always smooth sailings, COVID-19 has taken a toll on the nation's health facilities collapsing and high death rates following the surge of delta variants on the second wave (Janti & Lai, 2021). The early situation of Indonesian government deals with COVID-19 really shaped the trajectory of how the COVID-19 situation unfolded in Indonesia.

The first regulation announced by Indonesian government as a measure to tackle COVID-19 in Indonesia is Government Regulation No. 21 of 2020 on Large Scale Social Restrictions to Accelerate the Mitigation of Coronavirus Disease 2019 (COVID-19) or more colloquially known as PSBB (*Pembatasan Sosial Berskala Besar*) (Government Regulation No. 21 of 2020). The intention of this PSBB was initially good, as stated in the Law No. 6 of 2018 concerning Health Quarantine (Law No. 6 of 2018), which mandated that the restriction involve the closing of schools and workplaces, restricting religious activity, and restricting any activities in public places or public facility (Law No. 6 of 2018). Nevertheless, the implementation of this regulation is confusing and inconsistent. The government regulation prescribes that matters regulating COVID-19 shall be addressed and implemented by the regional governor or leaders, however the central government believes that they still own a certain authority and wants to ensure that the policies between regional and central government are synchronised (Smeru Research Institute, 2021). This becomes a challenge in itself due to the situations of every regions in Indonesia is different and the central government should also respect the regional autonomy. In implementing the PSBB, Indonesian government believes that lockdowns and regional quarantine is not the option due to the belief that it would hurt the economy, this leads to the central government creating regulations for economic recovery and imposing 'new normal' rather than focusing on the COVID-19 handling when clearly Indonesia was not ready for a new normal just yet (Ombudsman Republik Indonesia, 2021).

After receiving various internal and external scrutiny due to its method of handling COVID-19 in the country, the government pushed more regulations to impose stricter measures on dealing with COVID-19. Indonesia finally put a new method in place in which many believes are more effective to tackle COVID-19. After a series of large-scale social restrictions (PSBB) saga, Indonesia tried to implement community activity restrictions (PPKM) with 4 stages or implementation including PPKM micro, emergency-natured PPKM level one, two, three, and four. Being supported with national-scale of vaccination programs and the 3M health protocols (washing hands, wearing masks, keeping distance) and enforcing 3T (Tracing, Treatment, Testing) (Bureau on Communication and Community Service, Ministry of Health RI, 2021), resulted in a successful PPKM effort to flatten the curve.

2.2.2 The urgency of seeking a sustainable and viable pandemic law model to tackle COVID-19 pandemic

Due to various reasons namely the late response and ineffective pandemic laws as have been established above, the COVID-19 regulatory approach for COVID-19 in Indonesia shall be questioned and whether the current frameworks will suffice at the test of time. Sustainability becomes contingent for Indonesia's COVID-19 handling due to the volatility of cases over time. As of this writing, health authorities and hospitals in Indonesia believes that they shall prepare for the third wave incoming to Indonesia, this was suspected due to low vaccination rates and the idea of 'revenge travel' after a long period of social restrictions (Loasana, 2021). As stated by epidemiologists, the third wave may slowly strike Indonesia again around December 2021 to January 2022 following the school offices, and new year holiday (Loasana, 2021). In preparing for the third wave, this journal hopes that Indonesia can learn from sustainable measures implemented by Singapore model of COVID-19 measures in applying the policies and regulations.

2.3 Singapore responses to COVID-19 and pandemic law implementation

2.3.1 Singapore's legal response and public health measures to COVID-19

Singapore has been receiving great appraisal by international community through pandemic response and sustainable adaptations model implemented within the country. Despite located as a global trading hub in Asia (Editore, 2020), which resulted in Singapore being the melting pot of people coming from different states, Singapore has proven that such location is not a hindrance for a successfully contain COVID-19 within the country. Singapore has had its first case earlier than Indonesia. Singapore found its first COVID-19 case (66 years old Chinese male) on 23 January 2020 similar to the time frame of early cases in the United States (Tariq et al, 2020). In comparison to Indonesia, Singapore has closer contact to Wuhan, 3.4 million of people each year are estimated traveling between Singapore and Wuhan each year. Due to this fact, aside from being located as Asia's economic hub, this further define how much of a threat COVID-19 is to Singapore (World Health Organization, 2020).

The response of Singapore was deemed sufficient due to their early start, after receiving their first case, Singapore government has been actively tracing case and imposing a strict social distancing measures. The decisiveness and stringent approach have been implemented even since before the detection of the very first COVID-19 case in Singapore. The Singapore government implemented and formed multi-ministerial committee on 22 January 2020 ranging from the Minister of Finance, Minister of Trade and Industry, Prime Minister, Deputy Prime Minister, and the Coordinating Minister for Economic Policies, in addition after the first case was detected, Singapore government added the Minister of Health as the co-chair within the committee (Tan, 2020). In addition to such measure, Singapore has also managed to donate up to UD\$500,000 in support of the COVID-19 handling to the World Health Organization (CAN, 2020).

The first legal response made by the Singapore government is formulating and implementing legislation in the COVID-19 (Temporary Measures) Act 2020 (Republic of Singapore Government Gazette, 2020), to further accelerate this regulation, the Singapore government also formulate and implement the COVID-19 (Temporary Measures) (Control Order Regulations) 2020 (Republic of Singapore Government Gazette, 2020). COVID-19 (Temporary Measures) Act 2020 was passed by the Singapore Parliament on 7 April 2020, it functions as a guidelines for the Singapore government to response any matters related to the handling of COVID-19 pandemic (Republic of Singapore Government Gazette, 2020). This legislation is also a form of legal enforcement by the Singapore government to maximize the circuit breaker period starting from 7 April 2020 in which the Singapore government have instructed Singaporeans to stay at home during the period of circuit breaker. COVID-19 (Temporary Measures) Act also bans any forms of gatherings for family or friends that are not living together. Gathering in public spaces including void decks and parks and home was also banned as prescribed in the legislation (Republic of Singapore Government Gazette, 2020). In times of the circuit breaker period and as provided with the previous legislation, Singaporean can go to work when they are working in a sector of essential service provider and work at specified schools or childcare centres, Singaporeans can send their children to childcare under the condition of both parents work in the provider of essential services, Singaporeans can access essential goods such as buying groceries, getting a haircut, or going to a laundry place, exercising alone is also allowed in the space where the individual lives or in open space, Singaporeans can also seek any form of medical help when they feel any COVID-19 symptoms or infection or any urgent treatment, Singaporeans can also give any form of assistance to the

senior members of the community and to seek help in times of emergency, Singaporeans have to also comply with the court order and the new law related to the COVID-19 measures, to make any report to the National Service, Singaporeans can also move to another housing and leave Singapore (Republic of Singapore Government Gazette, 2020; Government Singapura, 2020). However, when leaving the house for any type of matters Singaporeans shall keep a distance minimum for 1 metre from others unless there are several places where it would be impossible to keep a distance such as lifts, public transport, and vehicles (Republic of Singapore Government Gazette, 2020; Government Singapura, 2020).

2.3.2 Early detection, response, and contact tracing

The fact that the Singapore government has already formulated and promulgated a committee and even response towards COVID-19 pandemic shows that the Singapore government response towards COVID-19 in a serious manner and understanding the severity of the pandemic itself. Singapore have also considered to step out early noting that the first case or the detection was on the 23 January 2020 (CAN, 2020), this is considered early than most countries including Indonesia which only announced its first case in early March 2020 (Gorbiano, 2020).

Contact tracing functions to actually break the transmission chain by identifying the contact of any person or individual which suspected to have been infected with the COVID-19 (Guo et al, 2020). In implementing the contact tracing, Singapore implemented a mobile phone applications namely TraceTogether and SafeEntry in purpose of detecting people in public within a close proximity and also adding the amount of time or duration of time between the encounter of the infected people and the application holder (Singapore Government Agency Website, 2020; TraceTogether Singapore Government Agency Website, 2020). Indonesia in a way has been inspired to create a tracing app such as TraceTogether namely PeduliLindungi. The Ministry of Communication and Informatics have also stated PeduliLindungi application was inspired by the Singapore government's TraceTogether application (Kementrian Komunikasi dan Informatika RI Direktorat Jenderal Aplikasi Informatika, 2020). This reflects that Indonesian government has indeed uses the Singapore government measures as a benchmark for the measures taken by the Indonesia government. TraceTogether was originally formulated by the Singapore government as a way to tackle the situations where COVID-19 infected patients continuously ignoring the quarantine orders and were not frank towards the history of their travels despite having been in a country with high COVID-19 cases. Evidently, SafeEntry and TraceTogether has been deemed highly effective in managing the contact tracing in Singapore by way of community's surveillance towards COVID-19 infection. This has been proven that TraceTogether has managed to help in terms of identifying 25,000 numbers of the COVID-19 close contacts cases as of November 2, 2021 with also 2.7 million downloads (Ministry of Health Singapore, 2020).

The success of the Singapore government in the contact tracing app development have also proven by several countries adopting the same measures. Not only Indonesia, TraceTogether have also become an inspiration of the Australian government in establishing COVIDSafe application as an app used for the contact tracing app (Department of Health of Australia, 2020). This serves as evidence that Singapore during the early COVID-19 cases have become the benchmark or the pioneer of the contact tracing application for many COVID-19 infected countries (Department of Health of Australia, 2020).

2.3.3 Lockdown measures

As many countries implement, lockdown have become an option to contain the virus by limiting movement to contain the virus and to stop the chain of the transmission. Despite not implementing national lockdown on the very early stages, the Singapore government do recommend some form of social distancing. In the circuit breaker period or the national lockdown, the Singapore government through the COVID-19 (Temporary Measures) Act 2020 imposed social distancing and prohibiting several activities such as social gatherings also including home gathering, private home parties, and friends gathering. Based on the Section 34(7) of the COVID-19 (Temporary Measures) Act 2020, offenders or those who commits any type of offences prohibited in the legislation will be imposed fine up to maximum S\$10,000 and or an imprisonment time for up to maximum months, as for the subsequent offenders or those who commits the offence more than once will be imposed fine up to maximum S\$20,000 and or imprisonment time for up to maximum 12 months (Republic of Singapore Government Gazette, 2020). This strict approach during the circuit breaker period have deemed to be effective because of the high amount of penalty and severe punishment such as imprisonment. This is somehow different with Indonesian approach in lockdown, the Singapore government imposes lockdown very early on April 7, 2021 meanwhile Indonesian government was very slow in terms of imposing the lockdown in Indonesia as the reasoning of the Indonesian president, Joko Widodo believes that such lockdown imposed by other countries will be costing severe economic and social impact. Further he added, that lockdown is simply unfeasible for Indonesia and he stated as the head of Indonesian government that Indonesia will not impose a full-scale national lockdown. This attitude has been kept consistently since the early COVID-19 in 2020 cases up to mid-2021 until the Delta variant of COVID-19 strikes in July 2021. It took Indonesia a year to fully implement regional lockdown by implementing Emergency Public Activity Restrictions or colloquially known in Bahasa as '*PPKM Darurat*' or '*Emergency PPKM*'.

However, this has to be noted that Singapore is a country with one of the most rapid economic growth and busy economic activity mainly due to its location as a strategic trading hub and favourable environment for international trade (Siddiqui, 2010). Therefore, a national lockdown is feasible to be carried out by the Singapore government. Meanwhile looking at Indonesia's perspective, the social security of its people has been threatened due to many are being laid off by companies even before the existence of the massive regional lockdown such as Emergency PPKM. As stated by Joko Widodo, Indonesian President, that simply putting up lockdown will suffer the nation's economy (Muhtarom (ed), 2021).

2.3.4 Community responses

Singaporeans' community awareness and knowledge towards COVID-19 was also one of the success of the COVID-19 handling in Singapore. The example of community participation and response is conducted by the Singapore leading university, National University of Singapore through NUS Yung Loo Lin School of Medicine publication which took part in establishing the community awareness and knowledge related to COVID-19. The platform is by way of creating a cartoon series related to the COVID-19 information namely "*The COVID-19 Chronicles*", essentially the illustrations is an educational series of the COVID-19 situation (National University of Singapore Yung Loo Lin School of Medicine, 2021). This illustrations amplified the knowledge and community awareness in response to establish a stronger community in the fight against COVID-19.

Despite being the leading country in terms of the COVID-19 handling, there are also people trying to take advantage of the situation such as scammers which scammed people and impersonating as one of the health officials, people that reports a false information in relation to the COVID-19 death information, and also the spread of hoax and misinformation within the community. In tackling this, the Singapore government uses the existing legislation, the Protection from Online Falsehoods and Manipulation Act which was released in October 2019 (Protection from Online Falsehoods and Manipulation Regulations, 2019). The Act itself was rather interesting, the Act can order websites to insert the Singapore government correction of the false information by way of putting the “correction notices” beside the website content which is deemed as misinformation, the Singapore government can also issue a force “take down” by removing the content containing misinformation from any individual, news outlets, or any social media companies 2019 (Protection from Online Falsehoods and Manipulation Regulations, 2019; CNBC, 2020).

To conclude, the community response varies just as any country in the world, there are community which are in support of the COVID-19 handling and there are also community which oppose of take advantage of the dire situation. Nevertheless, the Singapore government has been ready to tackle those challenges and fight back the misinformation and hoax.

2.4 Singapore’s sustainable measure to response the COVID-19

Singapore, similar to many countries were still on the phase of constantly changing the lockdown regulations by way of easing and tightening the lockdown again. This changes can be seen through the many amendments of the COVID-19 (Temporary Measures) Act 2020. However, despite undergoing many amendments, the consistency of the Singapore government in implementing the regulation should be appraised. This is in contrary to Indonesia’s partial lockdown regulations which changes its name every few months resulting a confusion within the community as to what are those changes and deemed that such implementation and name changing is inconsistent (Aditya & Erdianto (ed), 2021).

Undergoing lockdown can severely impact not only the country’s economy as have been predicted that the economy of Singapore is predicted to shrink for about 6% up to 6.5% in comparison to the Singapore’s 2020 economy (CNBC, 2020). Therefore to tackle this challenge and to boost the economic recovery, the Singapore government has then again proposed a form of exist strategy by “living with COVID-19”, this idea is not without a plan. The Singapore government will impose gradual relaxation of the restrictions or commonly known as gradual exist strategy or GRES, by laxing the social distancing measures, conducting intermittent lockdown based on the situation, preparing the public health facility, increasing the standard of care for COVID-19 patient in order to reduce severe case or death rates (Anderson, 2020; Dicken et al, 2020). In addition to the gradual exit strategy, the COVID-19 vaccination rates in Singapore is also higher than most states, as of the writing of this article 84% of the country’s population have been getting the full two doses of the COVID-19 vaccination, the 85% of people have received one dose of vaccine, and the 13% of the Singapore population have been receiving the booster shot or the third shot (Ministry of Health Singapore, 2021). Through the “living with COVID-19” method, despite the surging cases in Singapore is increasing, the fatality or the death rates is relatively low where most patient are treated in in home care rather than ICU (Ministry of Health Singapore, 2021).

3. Conclusion

Being located in the trading hub, both Indonesia and Singapore received disadvantages in the handling of COVID-19. However, as have been established the Singapore government acted in a fast-paced and efficient manner in combating COVID-19 in their country. This have been proven by the creation of committees even before the announcement of COVID-19 case in Singapore and the strict measures on national lockdown and social distancing. Indonesia however, in the early stages have been quite dismissive and denial in terms of the existence of COVID-19, from opening the country to tourism industry to imposing ineffective regulations and inconsistency between the regional and national lockdown, and the hoax and even misinformation coming from the officials such as the previous Minister of Health of the Republic of Indonesia. Despite all those challenges, as of the writing of this article, Indonesia has managed those challenges by implementing more strict regulations and measures towards the COVID-19 handling, resulting a significant decrease of death rates. In the near future, there has been a prediction that the third wave will be experienced by Indonesia in December-January 2021. To prepare for the situation, Indonesian government can implement measures taken by the Singapore government if Indonesia also plan to “live with COVID-19” which requires a comprehensive plan of pandemic law such as imposed by Singapore.

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