Singapore, Geneva, Hong Kong and Dubai

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Geneva and the Swiss model

Switzerland and Singapore reached similar positions by different paths. The Swiss law of international arbitration, in chapter 12 of the Federal Act on Private International Law, came into force in 1989 and was revised with effect from 1 January 2021, notably to allow submissions in English before the Federal Supreme Court. Swiss law offers a single action for annulment directly before that court, which decides within a few months. Singapore law allows a challenge in the High Court followed by an appeal.[1] Switzerland ratified the New York Convention on 1 June 1965, more than twenty years before Singapore acceded to it.[2]

The institutional landscape differs as well. Geneva has no single dominant institution comparable to SIAC. The Swiss Arbitration Centre, founded in 2021 by the Swiss chambers of commerce and the Swiss Arbitration Association, administers cases under the Swiss Rules, while many Geneva arbitrations run under the ICC Rules.[3] The comparison shows a difference of style that recurs throughout this book.

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Switzerland relies on a liberal statute and a decentralised community of practitioners. Singapore combines a liberal statute with active state promotion and a single flagship institution.

Hong Kong and Dubai

Hong Kong is Singapore's closest competitor. It shares the common law, the Model Law and an international bar with Singapore. The 2025 survey ranked the two seats equally. HKIAC's caseload was smaller in 2024, with 352 new cases against SIAC's 625. Hong Kong's distinctive asset is its relationship with mainland China. Since 1 July 1997 the New York Convention has applied to Hong Kong under China's accession.[4] Singapore's answer is neutrality. For a dispute between a Chinese and an Indian party, or between a Chinese state enterprise and an American investor, a seat outside the Chinese legal order is often easier to agree.

Dubai has become a growing seat for disputes involving the Gulf, South Asia and Africa. The United Arab Emirates acceded to the New York Convention in 2006, twenty years after Singapore.[5] Its arbitral institutions have been reorganised under state direction in recent years, a reminder of how quickly the landscape of a seat can change. Dubai competes with Singapore mainly for disputes involving Indian, Middle Eastern and African parties, a market that SIAC also targets through its office for South Asia.

In figures

New York Convention: Singapore's accession 21 August 1986, in force 19 November 1986; 172 states parties. International Arbitration Act: passed 31 October 1994, in force 27 January 1995. SIAC: established 1 July 1991; more than 7,000 cases handled. New cases at SIAC: 343 in 2016, 1,080 in 2020, 625 in 2024 and 886 in 2025 (737 administered). International cases in 2025: 89 per cent, with parties from 79 jurisdictions. Total sum in dispute in 2025: USD 14.53 billion. Trade disputes: 346 cases or 39 per cent. Governing law: Singapore 52.1 per cent, English 28.4 per cent. Expedited Procedure: 1,169 requests and 667 acceptances since 2010. Emergency

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arbitrator applications accepted since 2010: 191. Streamlined Procedure: 60 cases in its first year. Preferred seats in the 2025 survey: London 34 per cent, Singapore and Hong Kong 31 per cent each.[6]

Notes

1. Ressos, *Genève*, partie F, chapitre III (n above), sections « Le droit suisse de l'arbitrage international » and « L'arbitrage à Genève : une histoire », citing Art. 176 LDIP and the Federal Act of 19 June 2020 (RO 2020 4179), in force 1 January 2021. ↩
2. UNCITRAL status table (n above): Switzerland, ratification 1 June 1965, entry into force 30 August 1965. ↩
3. Ressos, *Genève*, partie F, chapitre III (n above), « Les institutions : le Swiss Arbitration Centre et les autres ». ↩
4. UNCITRAL status table (n above): China, accession 22 January 1987, entry into force 22 April 1987; extended to the Hong Kong SAR on the resumption of sovereignty on 1 July 1997. HKIAC and SIAC caseloads for 2024: Conflict of Laws.net, 12 August 2025 (n above). ↩
5. UNCITRAL status table (n above): United Arab Emirates, accession 21 August 2006, entry into force 19 November 2006. ↩
6. SIAC, *Annual Report 2025*, Statistics 2025; UNCITRAL status table; International Arbitration Act 1994, Legislative History; Conflict of Laws.net, 12 August 2025 (all as cited above). ↩

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