

Censorship vs. self-censorship:

Press control in Fiji and Singapore

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ABSTRACT

Constraints imposed on the press in Fiji under the 2010 Media Decree have been compared with the system of press control in Singapore. The two systems are, however, quite different. Fiji imposed censorship and criminalized journalism ethics, while the more sophisticated system of press control that has evolved over the past 50 years in Singapore sees journalists exercise self-censorship. The press in Singapore was brought to heel over a period of decades by founding prime minister Lee Kuan Yew through regulation, licensing, and legal intimidation. Fiji's press system is still evolving, but its use of prior restraint on publication and criminalization of journalism ethics are measures to which Singapore never resorted. Implications for the development of Fiji's press are discussed.

Fiji's 2010 Media Industry Development Decree has been compared to restrictive press legislation in Singapore (Dutt, 2010; Seke, 2010). One analysis found the Fiji Media Industry Development Authority established by the decree to be very similar to Singapore's Media Development Authority, which was set up in 2003. The power vested in the minister responsible for the appointment and dismissal of each Authority was found to be almost identical, as were the functions and powers of each Authority. Both the 2010 Media Industry Development Decree and the 2003 Singapore Media Development Media Act, the analysis noted, protect their respective Authority from liabilities, and both empower officials of the Authority to demand documents from journalists and news organizations. The courts, it noted, are also given similar powers to impose sanctions on journalists and news organizations. Differences noted in the Fiji decree included its use of existing media codes to establish guidelines for journalistic behavior, its establishment of a Media Tribunal to handle complaints, and the ability of parties to a complaint to challenge rulings of the Tribunal in the Fiji Court of Appeal. 'Overall, the [Fiji] decree was drafted in the same vein as the Singapore Act and many of the sections were copied word-for-word by the Fiji decree' (Dutt, 2010, p. 86).

The *Fiji Times* reported in 2008 that Prime Minister Frank Bainimarama called on senior media executives in a meeting to act more like the Singapore media and to be more 'pro-Fiji' (News heads, 2008). A controversial report on media ordered by the Fiji Human Rights Commission earlier that year had urged that 'wise restraints . . . be culled from the Singapore legislation on the establishment of a Media Development Authority' and noted that a version of the Singapore legislation had recently been adopted by Tonga (Anthony, 2008, p. 95). The report was released shortly after the publisher of the *Fiji Sun* newspaper was deported because the interim government claimed he was a danger to national security (Media body, 2008). Local media outlets refused to participate in the review process because they

considered the report's author to be biased and the Fiji Human Rights Commission to be pro-regime. The report also recommended a 7 percent tax be levied on media revenues to fund the Authority and urged that no work permits for expatriates in the media industry be renewed and that no further work permits be issued (Panapasa, 2008).

While wording of the 2010 Media Industry Development Decree may be similar to legislation in Singapore, its effect is considerably different for the news media in Fiji, especially while provisions of the 2009 Public Emergency Regulation (PER) remain in place. The PER, which was imposed after a court ruling found the 2006 military coup illegal, placed strict oversight on media, including censorship. It was originally put in place for 30 days but has been extended for more than two years. Censorship has never been imposed on news media in Singapore since the country gained its independence, and criminal sanctions on journalists and media organizations for ethical violations are not contained in any law. The Singapore Media Development Authority, which replaced the Singapore Broadcasting Authority, regulates only broadcasting and online media, while print publications are regulated mostly by the 1974 Newspaper and Printing Presses Act. Movies, computer games, and music are censored by the Ministry of Information, Communications and the Arts (MICA), while pornography and magazines such as *Playboy* and *Cosmopolitan* are prohibited under the Undesirable Publications Act (Gomez, 2005).

There are parallels to be drawn between media regulation in Fiji and Singapore, however, and lessons to be learned. But to understand the applicability of Singaporean press legislation to Fiji, it is first important to understand the similarities and differences in the two countries, as well as the particular context in which press controls evolved in Singapore.

Country comparison

Fiji and Singapore share several similarities but also exhibit some important differences. Both are island nations and former British colonies. Singapore has a population of about 5 million living on only 694 square kilometres just north of the equator at the tip of the Malay Peninsula in Southeast Asia. Fiji's population of about 850,000 is spread out over more than 18,000 square kilometres. Singapore obtained its independence in 1963 and was a province of neighboring Malaysia for two years before becoming a sovereign nation. Lacking any natural resources – even its water supply has to be imported by pipeline from Malaysia – Singapore has nonetheless emerged as one of the “tiger economies” of Asia. Situated on the eastern end of the Straits of Malacca on the main east-west shipping route, Singapore leveraged its excellent natural harbor to become a centre for world trade. It has also harnessed its impressive infrastructure and the industriousness of its workforce to become a world capital for information technology. Singapore's rapid industrialization has seen its per-capita GDP rise to third in the world by 2010, according to the IMF, behind only Qatar and Luxembourg. Fiji, by contrast, ranked 123rd, one spot ahead of Mongolia but behind Turkmenistan, Namibia, and the Republic of the Congo.

Singapore's economic success has been largely credited to the guidance of founding prime minister Lee Kuan Yew, who served in that post from 1959 until 1990. A major component of Lee's nation building strategy was bringing to heel Singapore's press, which had been dominated by expatriate journalists and was harshly critical of his party's policies. As a result, Singapore's media is tightly controlled and its government has been regularly criticized for restricting press freedom. Paris-based Reporters Without Borders ranked Singapore 136th out of 178 countries in its 2010 Press Freedom Index, placing it last among developed economies. New York-based Freedom House placed Singapore 150th out of 196 countries in its 2011 ranking of press freedom, with a press rated Not Free at a numerical

score of 68 on its 100-point scale. Fiji was paradoxically ranked lower than Singapore at 149th out of 178 countries by Reporters Without Borders, but higher than Singapore by Freedom House at 124th out of 196 countries, with a press rated Partly Free at a score of 57. Fiji's ranking by Freedom House had fallen sharply since 2005, however, when its press was rated Free, and its score worsened by 14 points after the 2010 Media Decree was enacted. Its current score places Fiji only three points from the organisation's Not Free category, which starts at a score of 60.

Freedom of speech and expression are theoretically guaranteed by Article 14 of Singapore's constitution, but these rights have been severely limited in practice. Along with prohibiting the publication of anything that would 'excite disaffection against the Government' or even 'raise discontent or disaffection amongst the citizens of Singapore', the 1964 Sedition Act prohibits the publication of anything that would 'promote feelings of ill-will and hostility between different races or classes'. This proscription was the result of clashes brought by Singapore's delicate ethnic balance of roughly 75 percent Chinese, 15 percent indigenous Malay, and 10 percent Tamil, whose ancestors were brought by the British colonists as indentured workers from Sri Lanka, which was then known as Ceylon.

Multicultural balance

Fiji and Singapore also share this history of ethnic tensions that have occasionally boiled over into violence. Singapore responded to race riots in 1950 and 1964 by prohibiting in the 1964 Sedition Act the publishing of material likely to inflame racial or religious tensions. The first episode that showed the power of the press to engender ethnic violence in Singapore occurred in 1950, when newspaper coverage of a high-profile custody case led to rioting by Muslims. The case involved 13-year-old Maria Hertogh, who had been born to Dutch parents and baptized a Catholic but was raised by a Muslim family after being separated from her parents

during their evacuation of Singapore during the Japanese invasion in World War II. As a result, the girl was renamed Nadra and raised in the Islamic religion after losing contact with her parents, who fled to Holland. When they learned of her whereabouts in Singapore several years after the war, her parents sought and were granted a custody order. Maria's adoptive parents attempted to thwart the order by marrying her to an imam, but her natural parents contested the marriage on the grounds that she was under age. Maria declared her desire to remain a Muslim in Singapore rather than return to her natural parents in Holland. 'I am a Muslim girl and I want to stay with my husband', she told the *Straits Times*. Coverage of the case was sensational, with the English-language *Standard* newspaper featuring a front-page picture of the girl holding hands with the Mother Superior in the Catholic convent she had been ordered sent to by the court pending an appeal of the custody order. Malay-language newspapers, by contrast, featured pictures of Maria weeping and carried reports of her distress. Two Muslim newspapers formed a 'Nadra action committee' and framed the conflict as one between Christianity and Islam. Rioting broke out when the verdict was announced that Maria would be returned to her natural parents, with mobs of angry Muslims roaming the streets, beating and killing Europeans. By the time order was restored three days later, eighteen people had been killed and 173 injured. An inquiry blamed press coverage for inflaming racial and religious tensions (Turnbull, 1995). The Hertogh case has ever since been cited as an exemplar of the need for responsibility by the press in covering racial and religious issues in Singapore.

Another race riot that broke out in 1964 was twice as deadly. It followed a months-long campaign by Malay-language newspapers that portrayed the Singapore government as biased against indigenous Malays because they were not being afforded the same privileges that they enjoyed in Malaysia. The vituperative nature of the campaign against the prime minister prompted Lee Kuan Yew to file a lawsuit against the *Utusan Melayu* newspaper. Tensions

were thus high when a parade on the Prophet Mohammed's birthday turned violent, with Malays attacking police and Chinese. On the first night of violence, four people were killed and 178 were injured. A curfew was imposed, but the Chinese secret society organized revenge attacks against Malays. After a week of violence 24 people had been killed and 460 injured, with thousands arrested. The violence flared up again a month later after a Malay trishaw driver was killed, and another dozen deaths and 87 injuries were incurred before order was restored. In total, the violence caused 36 deaths, 556 injuries, and 3,000 arrests. The riots brought a call for regulation to prevent the press from inciting race hatred, resulting in such provisions being included in the 1964 Sedition Act. After Singapore separated from Malaysia in 1965 over racial policies, violence broke out again in neighboring Kuala Lumpur between Malay and Chinese in 1969. A heavy military presence on the streets of Singapore, however, deterred violence from spreading there. The government also moved quickly against the press. The *Utusan Melayu* newspaper was banned for fomenting Malay nationalism, and the circulation of other Malaysian newspapers was restricted.

Lee versus the press

Lee Kuan Yew waged a campaign against the dominant English-language daily, the *Straits Times*, even before his election as Singapore's first prime minister in 1959. The newspaper had opposed both Lee's party, the People's Action Party (PAP), and its platform of union with Malaysia. At an election rally, the Cambridge-educated lawyer and union organizer issued the first of what would become a series of stern warnings to the press.

Any newspaper that tries to sour up or strain relations between the Federation and Singapore after May 30 will go in for subversion. Any editor, leader writer, sub-editor or reporter that goes along this line will be taken in under Preservation of Public Security Ordinance. We shall put him in and keep him in (Quoted in Hoffman, 1959).

In a front-page editorial, *Straits Times* editor Leslie Hoffman averred that "not since the Japanese conquered this island in Feb 1942, has the press of Singapore faced such a grave

threat as it does today” (Hoffman, 1959). In a letter to the editor, Lee reversed course, saying he was only talking about the foreign-owned press. The *Straits Times* was preparing to move its headquarters to Kuala Lumpur, Malaysia, in an attempt to become a pan-Malaysian newspaper, keeping only a skeleton staff at Times House in Singapore. Lee’s letter to the editor made it clear that he considered the *Straits Times* a foreign newspaper and claimed that he believed Singapore-based publications should enjoy press freedom.

We of the PAP believe just as zealously in the freedom of the press. If locally-owned newspapers criticize us, we know that their criticism, however wrong or right, is bona fide criticism because they must stay and take the consequences of any foolish policies or causes they may have advocated. Not so the birds of passage who run the *Straits Times*. They have run to the Federation, from whose safety they boldly proclaim they will die for the freedom of Singapore (Quoted in Turnbull, 1995).

Ironically, when Malaysia imposed a 20-percent limit on foreign ownership of its newspapers in 1972, the *Straits Times* was forced to sell 80 percent ownership of its Malaysian edition, which was renamed the *New Straits Times*. To this day, neither newspaper is allowed to be circulated in the other country. Upon returning its headquarters to Singapore, *Straits Times* management found itself in the midst of a war between Lee and the press that would result in a series of restrictive laws aimed at curbing press freedom. In 1971, Lee had accused the Chinese-language newspaper *Nanyang Siang Pau* of promoting communism and fomenting racial unrest with its criticism of a decline in Chinese-language education. In May of that year, four employees of the newspaper were arrested under the Internal Security Act. Lee then accused the English-language *Eastern Sun* of receiving communist funds from Hong Kong to engage in covert operations, or ‘black ops’. It soon closed after its senior staff quit rather than work under this suspicion.

The newly-created *Singapore Herald* criticized these moves, so Lee withdrew all government advertising from its pages and revoked its government press credentials. Other newspapers in the region, including the *Melbourne Age* and the *Bangkok Post*, rallied to assist the *Herald* by

sending journalists to replace expatriates who had their work visas revoked. The *Hong Kong Standard* pledged a half million dollars in support of the *Herald*. Lee summoned *Standard* publisher Sally Aw to a press conference at the Singapore airport, along with her bankers from New York City. He demanded to know the source of the funds, and he prevailed on the Chase Manhattan bank to cut off funding for the *Herald*. This tactic backfired on Lee, as public sympathy and a resulting ‘Save the Herald’ campaign saw its circulation quadruple. Lee won in the end, however, when he simply withdrew the newspaper’s publishing licence and expelled its newly-unemployed expatriate journalists (Turnbull, 1995; Seow, 1998). According to George (2007a), the government miscalculated when it assumed that the *Nanyang Siang Pau* would be silenced by the arrests, and when it continued to protest in print it precipitated a crisis of credibility for the government.

One interpretation of events is that the *Eastern Sun* and the *Herald* were dragged into the web by *Nanyang Siang Pau*’s intransigence – showing how raw coercion can spin out of control. . . . According to this theory, the *Eastern Sun* was sacrificed as a red herring (George, 2007a, p. 134).

Singapore press laws

The ultimate press deterrent of newspaper licensing was a legacy of colonialism that Singapore inherited from Great Britain in the form of the colonial government’s Printing Presses Act of 1920. The authoritarian model of press regulation, however, would become even more harshly applied under Lee (Ang, 2002). In a 1973 speech to the annual Press Club dinner, the prime minister issued a stern warning.

Every morning my task begins by reading five – four now – newspapers. And it’s a tiresome business. I note the scurrilous, the scandalous. I can live with that. But when any newspaper pours a daily dose of language, cultural, or religious poison, I put my knuckle-dusters on as the first stage. If you still continue, then I say here are the stilettos, choose your weapons (Quoted in Seow, 1998, p. 106).

Within months, the government announced the 1974 Newspaper and Printing Presses Act (NPPA), under which all newspaper companies were required to convert from private to public ownership, with their shares traded on the stock market. The act required that all directors of newspaper companies in Singapore be citizens of Singapore and also prohibited foreign funding of newspaper corporations without government approval. Only Singaporeans and corporations approved by the government were deemed eligible to hold management shares, which controlled editorial policy. A percentage of management shares were required to be held by government-controlled companies, which placed representatives on the newspapers' boards and at the heads of their executive committees (Tsun, 2008). At times, these representatives have included the prime minister's former press secretary and the former head of Singapore's secret service. In 1977, the act was amended to restrict ownership of shares by any one person to 3 percent (George, 2007a).

The early 1980s saw a series of heavy-handed government measures that led to the creation of a government-controlled newspaper monopoly. The transformation of the Singapore press was prompted by the PAP's loss of a seat in Parliament in a 1981 by-election. The government, which had won all seats in the previous three general elections dating to 1968, blamed press coverage. In 1982, the *Nanyang Siang Pau* was forced to merge with another Chinese-language daily, the *Sin Chew Jit Poh*, to form *Zaobao*, a broadsheet whose online edition is now the most widely-read Chinese language newspaper site in the world (Ang, 2007). The newspaper became the cornerstone of Singapore News and Publications Ltd. (SNPL), which was also given ownership of the *New Nation*, an afternoon daily the *Straits Times* had recently started publishing. According to Turnbull, who wrote the official history of the *Straits Times* on the occasion of its 150th anniversary, the government at first wanted the *Straits Times* to hand over both its *Business Times* and the *New Nation* to SNPL, along with their staffs, because it was considered in the national interest that the Chinese newspaper

group also publish dailies in English. A compromise was finally reached in which only the *New Nation* was ceded to SNPL, without its staff. 'In return the [Straits Times] group would be guaranteed freedom from competition in the English-language morning market for three years and would be permitted to publish its own Chinese-language newspaper' (Turnbull, 1995, pp. 342-343).

In 1984, a merger between the Straits Times group and SNPL was announced, leading shocked journalists to demonstrate with placards against the consolidation of all newspapers in Singapore into one publishing company. The government denied it was behind the move, but according to former Singapore solicitor general Francis Seow, "Lee's fingerprints could be seen all over the merger agreement" (Seow, 1998, p. 123). Singapore Press Holdings went on the Singapore stock exchange as the country's sixth-largest listed company, its largest industrial group, and its only monopoly. MediaCorp, which owns 80 percent of broadcast outlets in Singapore, is wholly owned by Temasek Holdings, an investment company owned by the government.

After achieving dominance over its domestic press by the mid-1980s, the Singapore government then moved against the foreign press, which had become popular in Singapore and had begun to report on domestic issues (Tsun, 2008). Singapore did so by amending the NPPA to severely restrict the circulation of publications whose coverage it considered unfavorable or even overly political. In 1986, the NPPA was amended to enable the government to restrict sales of foreign publications deemed to be interfering with domestic politics (George 2002). *Time* magazine, the *Asian Wall Street Journal*, and the *Economist* soon had their circulations cut by 90 percent, or were 'gazetted', after they refused to publish full-length, unedited replies by the Singapore government to articles critical of Singapore's policies. The *Far Eastern Economic Review* discontinued sales in Singapore altogether for a

time after the government cut its circulation in 1988 by almost 95 percent – from 9,000 copies a week to 500 – for the same reason. The Singapore government responded to criticism that it was engaging in censorship by again amending the NPPA to allow Singaporean printers to reproduce gazetted foreign publications without infringing copyright laws. No advertisements were printed in these copies of the *Far Eastern Economic Review* and other such publications which appeared with white spaces where advertisements had been. In 1990, the government amended the Act again to license foreign newsweeklies that sold more than 300 copies. Hong Kong-based magazine *Media*, which covered advertising, reduced its circulation in Singapore from 1,500 to 299 as a result (Wallace, 1995).

Foreign media outlets have also been taken to task for criticising Singapore's judiciary by being charged with contempt of court. *Newsweek* magazine and two of its employees were found guilty of contempt in 1974 for having scandalizing the courts of Singapore by observing that their decisions 'did little to dispel the notion that the courts here are little more than extensions of the one-party system'. The *Asian Wall Street Journal* was found in contempt of court in 1991 for an article that suggested the judiciary in Singapore was biased in its defamation ruling that year against the *Far Eastern Economic Review* (Tsun, 2008). The *International Herald Tribune* was also found in contempt of Singapore's courts in 1995 for publishing a commentary by an American educator that suggested some Asian leaders relied on a compliant judiciary to bankrupt opposition politicians (Shenon, 1995). As a result, noted the *Columbia Journalism Review*, the *International Herald Tribune* stopped printing articles critical of Singapore (Wallace, 1995).

The Internal Security Act allows for detention without trial in Singapore, although the last time it was used against journalists was in the *Nanyang Siang Pau* case in 1971. The Official Secrets Act has also been used against journalists. The *Business Times* received a leaked

government estimate of the country's economic growth for the second quarter of 1992 only to be charged, convicted, and fined for publishing confidential information before it was officially released (Ang, 2007).

OB markers

A salient fact about the most draconian pieces of legislation in Singapore – the Internal Security Act, the Sedition Act, and the Official Secrets Act – is their rare deployment against the press, noted Tsun (2008, p. 883).

Singapore's elaborate press control regime performs its role not so much by crude and illiberal control but through political and punitive coercion. . . . Within a framework where the political leadership's first priority is to win the arguments to gain acceptance and consent, these repressive laws serve more as a deterrent back-up and a potent symbol.

The PAP's tight grip on media in the city state has allowed it to retain political power continuously since 1959. Elections are a foregone conclusion in Singapore because opposition parties, knowing they have no chance to defeat the PAP at the polls, never nominate enough candidates to win the election, hoping at best for a few candidates to be elected in a protest vote. This is largely a result of the fact that the press is discouraged from covering opposition politicians. According to a former *Straits Times* journalist turned scholar, the Singapore media did not publish images showing crowd sizes at political rallies for more than 20 years.

If such photographs or video footage were used, they would show upwards of 10,000 thronging some opposition rallies with only a few hundred showing up at PAP events. . . . The consistent refusal by all newspapers and broadcasters to use any wide-angle images of rally crowds could hardly be anything other than a politically motivated blackout (George, 2007b, p. 901).

The *Straits Times* finally ended the two-decade blackout, noted George, late in the 2006 Singapore election campaign, but only after such pictures were published online by independent bloggers. The concession, he noted 'did little to ameliorate the perception of bias' on the part of the *Straits Times* (George, 2007b, p. 901).

Politics, in fact, is not a topic for media coverage at all in Singapore, as journalists there are discouraged from covering public policy issues. After *Straits Times* columnist Catherine Lim was critical of the government in 1994 for a lack of promised consultation and for large pay rises given to senior ministers, then-prime minister Goh Chok Tong responded that she should enter politics if she wished to comment on government policy (Chua, 1994).

According to Lee (2006), Goh's rejoinder to Lim was the first use of what are known in Singapore as 'OB markers', which denote what is 'out of bounds' for acceptable political discourse. 'The PAP summons the use of OB-markers to publicly rebuke political transgressors or "trouble-makers", a tactic that is highly effective in a society where "face" is of utmost importance'. In refusing to delineate the OB markers, noted Lee, the government often uses them retroactively, thus achieving 'a sophisticated mode of auto-regulation to enforce mass subjugation and discipline' (Lee, 2006, p. 67).

'Calibrated' coercion

The system of press control in Singapore, unlike the one in Fiji which relies on censorship and punitive laws, is subtle and sophisticated and relies on a legislative mechanism that has been constantly refined over a period of decades. What it has achieved is a system that has no need for censorship because it coerces journalists into censoring themselves. Self-censorship by journalists has thus been called 'Singapore's shame' (Gomez, 1999). George (2002a) calls the system of press control in Singapore 'calibrated coercion'. Recourse to draconian measures such as the Internal Security Act or the Sedition Act by the government, he notes, might have risked 'stripping the consensual aspect of its rule and exposing the raw coercive power underneath'. Instead of censoring, jailing, or fining journalists to bring the press into line, the government has crafted a framework of ownership and management control that has turned the Singapore press into 'willing ideological vehicles of the state'.

Even as it maintains and updates its arsenal of coercive powers, the Singapore government appears to have committed itself to the principle of strategic self-restraint, calibrating its coercion to get the job done with as little force as necessary. (George, 2002a, p. 135)

The defining legislative initiative that brought the press in Singapore under the thumb of the ruling PAP was the 1974 Newspaper and Printing Presses Act, which has been continuously amended ever since to remove any possibility of dissent against the government's hegemony. Its enactment, according to Tsun (2008, p. 890), laid a foundation for the subsequent development of a 'much more sophisticated regulatory framework against the press – far beyond the imagination and contemplation of politicians and the citizens in 1974'. The creation of management shares, according to Tsun (2008, p. 886), was an idea that 'worked so well in terms of achieving the desirable level of calibrated control that the political leadership found no reason to resort to using the Internal Security Act'. By employing a 'sophisticated idea from corporations law', the influence of government could infiltrate to the highest level of the corporate entities that it had ordered be created.

Management shares allocated to banks and other establishment figures . . . served as a critical mechanism for the government to influence a newspaper's workings without directly interfering with ownership and provided effective control of the board and top editorial positions (Tsun, 2008, p. 885).

While the NPPA retained the trump card of licensing approval, according to George (2002a, p. 135), its mandated public ownership and subsequent refinements qualify as nothing less than 'unique legislative innovations of subtle genius'. By shifting the burden to the press itself to practice self-censorship, critics tend to blame the newspapers instead of the government-imposed system under which they publish. 'This is quite unlike 1971, when, as the 'Save the *Herald*' campaign demonstrated,

critics viewed newspapers as victims of government repression' (George, 2002a, p. 135).

The PAP has achieved effective guidance of the press without either nationalizing ownership or brutalizing journalists. . . . Not all these stakeholders are happy with the system, all of the time. However, none of them has been so unhappy as to opt out of it entirely (George, 2002a, p. 135).

Public listing meant that the PAP did not have to deal with powerful press-owning families like the Lee Rubber family that was behind the *Nanyang Siang Pau*. The creation of management shares to be held by government nominees, noted George (2002a, p. 135), also institutionalized a 'mechanism for the government to influence a newspaper's editorial direction without totally subverting the market'.

Comparability of control

Whether Singapore's system of press control would work in Fiji, or any other country that lacks the unique characteristics that Singapore exhibits, is doubtful. The solution applied to a perceived problem with the press in Singapore would quite likely fail in another context exhibiting significant differences in political, economic, and cultural constraints. George lists Singapore's small geographic size, economic success, low unemployment, and high standard of living as factors that enable the government there to control its press without significant public dissent. 'The PAP is certainly unusual in its capacity to practise calibrated coercion. It may even be unique. . . . Thus, it is unclear whether other states would be able to apply calibrated coercion as adeptly as has Singapore' (George, 2002a, p. 143).

The provisions of Fiji's 2010 Media Industry Development Decree may be similar to those of the 2003 Singapore Media Development Media Act, but the fact that the former applies to the printed press while the latter does not obviates much of the journalistic comparability. It is doubtful nonetheless whether a Singapore-style press control system would work in Fiji, given the latter's low standard of living, high unemployment, different geography, and

unique political, historical and cultural antecedents. Whether Fijians want a press control system similar to that in Singapore is another matter altogether. Singapore's system of press control, which might be characterized as draconian but sophisticated, has resulted in much international criticism, although, unlike Fiji, it has not been expelled from the Commonwealth. Singapore's political system, however, has been described as an 'electoral autocracy' – a state that has elections without democracy – and is one of only two remaining such systems (the other being Malaysia) of the seven that existed in the 1960s and 1970s (Diamond, 2002). Fiji's system of press control, which might be characterized as draconian and unsophisticated, deserves much of the international opprobrium it has received. Whether or not censorship and other provisions of the 2009 Public Emergency Regulation are lifted sufficiently far in advance of promised elections in 2014 as to allow for a fair contest will go a long way to deciding what brand of democracy results, if any.

Under the PER, Fiji's news media are not allowed to discuss sensitive political issues, which would be required for free and fair elections are to be held. One of the hallmarks of press freedom, according to Hachten and Scotten (2007, p. 19) is 'the right of the press to report on, comment on, and criticize its own government without retaliation or threat of retaliation'. This 'right to talk' politics is comparatively rare, however, existing in only a dozen or so Western democracies despite many authoritarian governments claiming to allow a free press (Hachten & Scotten, 2007). In a press system that includes censorship and punitive laws aimed at journalists, an electoral autocracy is much more likely to result than a democracy in which the press has the right to talk politics.

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