

URBAN PLANNING AND
**ENVIRONMENTAL
 LAW REPORT**

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In this issue we feature a discussion of the implications of U.S. environmental laws for Hong Kong exporters and manufacturers with US based plants. This *Feature* is based on a speech by Fred Kan, founder and Senior Partner of Fred Kan & Co., presented in July this year at a Hong Kong Productivity Council Seminar entitled *The Impact of Environmental Laws on Imported Products: What Manufacturers/Exporters to Europe and USA Should Know*. Any readers interested in obtaining the full text of this speech may approach the Hong Kong office.

In *Regional and International* we comment on the decision of the GATT dispute settlement panel which held that a US restriction on imports of Mexican tuna caught using fishing methods contrary to the U.S. **Marine Mammals Protection Act** was in violation of the GATT. We consider this decision and its implications for U.S. environmental legislation which attempts to restrict imports.

We would also like to draw our readers' attention to two *corrigenda* concerning the operation dates of the *Air Pollution Control (Amendment) Ordinance* and our report concerning the possibility of relocating hazardous installations from Tsing Yi to the Soko Islands. We are always grateful to our readers for their comments and criticisms.

The Editors

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The Impact of U.S. Environmental Law on Imported Products

The value of Hong Kong's exports to the United States in 1992 totalled over HK\$213 billion. As exports to the U.S. are vital to Hong Kong's economy it is incumbent upon the government and manufacturers of Hong Kong to be vigilant of any development in the U.S. that may have an impact on the importation of goods into the U.S.

One major development which is growing in importance is environmental protection legislation.

In the past two decades the three levels of government in the U.S. - federal, state and local - and their respective agencies have made a myriad of statutes, by-laws, rules and regulations aimed at the protection and cleaning up the nation's air, water and land. As a result U.S. environmental law has become increasingly complex. In 1972 there were about 450 pages of federal environmental legislation. By 1991 there were 8,500.

Here we will consider some important federal and state environmental legislation pertinent to Hong Kong exporters.

Toxic Substances Control Act (TSCA)

The TSCA is a federal law which regulates the manufacture and importation of chemicals into the U.S. The Environmental Protection Agency (EPA) oversees its regulation by publishing a list of each chemical substance manufactured or processed in the U.S. called the 'TSCA Chemical Substances Inventory'. An importer cannot import an unlisted chemical substance or mixture without giving 90 days premanufacture notice (PMN) to the EPA.

The EPA has 90 more days to decide if the 'new' chemical will be regulated, based on a consideration of the chemical's potential environmental or health risks. If the EPA decides not to put any regulations on the chemical it may be imported into the U.S. There is a low volume exemption (LVE) for imports of 1,000 kg. or less but the importer must inform users that the use of the substance is restricted to the terms of the LVE notice.

The EPA requires importers to keep records on the use and potential health and environmental effects of the imported chemicals. The importer must also comply with regulations that ban or control the import, distribution or use of specific chemicals and mixtures. The importer may also be required to participate in the testing of the substances. The onus is on the importer to certify to U.S. customs that the substance is in accordance with the TSCA. A certificate from the EPA must accompany each shipment.

U.S. Customs has the right to detain any shipments that violate the TSCA. Upon detention, the shipment must

be subsequently brought to TSCA standards, or else it will be exported or destroyed.

Violators of TSCA are liable to Both civil and criminal penalties. The EPA may levy up to U.S.\$25,000/day for each violation, and incarceration may be an additional penalty for deliberate TSCA obstructions. However, voluntary admissions of liability could result in substantial reductions of civil penalties (importers Moses Lake Industries was awarded a 50 per cent penalty reduction by self-confessing its violating activities in a timely fashion).

'It is incumbent upon the government and manufacturers of Hong Kong to be vigilant of ... environmental protection legislation in the U.S.'

Although it appears that the TSCA places a burden on U.S. chemical substance importers, it is essential that Hong Kong manufacturers comply with the Act. Otherwise in the future importers will be reluctant to import their products.

Clean Air Act

Enacted in 1970, the Clean Air Act (CAA) was the first major piece of U.S. environmental legislation. This Act also regulates the manufacture and importation of ozone-depleting chemicals, such as chlorofluorocarbons. Today the U.S., like Hong Kong, is one of 71 member nations to the Montreal Protocol on Substances that Deplete the Ozone-Layer 1987, and the CAA requires that its terms be construed and implemented as a supplement to the Protocol's

objectives. The Protocol aims to eliminate the production and consumption of CFC's by 1996, and of hydrochlorofluorocarbons (HCFCs) by 2030. Meanwhile the Protocol mandates for a 75 per cent reduction in the CFC consumption by 1994.

The EPA oversees CAA and Protocol violations in the U.S. It must be noted that the EPA is serious in their enforcement. For example, in 1990, Fehr Brothers, a U.S. importing company paid a US\$102,000 fine for importing over 400,000 pounds of CFC-113 without the required permits.

The Comprehensive Environmental Response, Compensation and Liability Act

Hong Kong manufacturers should be aware of CERCLA's broad scope of liability. CERCLA was implemented in 1980 to address the cleanup and management of hazardous waste sites from previous activities. In practice, this Act has demonstrated its success in the sense that it has helped to shift the cost of cleaning up waste sites from the tax payer to the offender.

The salient provisions of CERCLA were considered earlier this year in the *Regional and International* section in the May-June edition of the *Report*.

State Recycling Initiatives

State recycling goals mandate the source separation and collection of from 20 to 50 per cent of certain designated materials, usually paper and paperboard, glass, metals, plastics and yard wastes within specified time-periods. Counties and municipalities then develop their own plans as

to how the goals will be achieved. Examples include Florida's initiative to reduce the amount of solid waste to be disposed of without a recycling plan by 30 per cent in 1994, and California's 50 per cent diversion from solid waste by the year 2000. Illinois, Louisiana, Maryland, North Carolina, New Jersey, Rhode Island, Maine, Connecticut and the District of Columbia all contain individual recycling initiatives.

Several States such as Alaska and California, and even the federal government have enacted procurement guidelines requiring governmental agencies to move towards the use of recycled products to the most practicable extent. California requires that by the year 2000 recycled paper must make up at least 40 per cent of all its paper purchases.

It is not uncommon for states to impose product taxes or packaging taxes based on weight of virgin non-recycled materials or by flat-rate. For example, Florida imposes on newsprint manufacturers a 10 US cents a ton tax on every ton of newsprint consumed in the state to encourage recycling. The tax will lower or rise depending on whether the reduction goal is met by a specified date. More progressive state governments could implement like taxes to various non-recycled products in the future.

Environmental Labelling Laws

There are no laws that require a package to be marked as being recyclable. Nevertheless, a manufacturer must be careful not to use a term such as 'environmentally friendly', 'recyclable', and 'biodegradable',

unless its product meets the minimum requirement of the definition in the given jurisdiction. For example, in California, a product cannot be advertised as recycled unless it contains 10 per cent post-consumer waste. Offenders may be both criminally and civilly liable.

Hong Kong manufacturers must be aware that if their products do not use 'green' product labelling their products might be subjected to public scrutiny. The U.S. Green Seal was established in 1990 as a non-profit labelling organization. This group bases its report on a life cycle of each product, from production to disposal.

CONEG Model Toxics Legislation

The Model Toxics Legislation as developed by the Source Reduction Council of the Coalition of New England Governors (CONEG) in December of 1989 recognizes that:

1. The management of solid waste can pose a wide range of hazards to public health and safety, and to the environment;
2. Packaging comprises a significant percentage of the overall solid waste stream;
3. The presence of heavy metals in packaging is a part of the total concern in light of their likely presence in emissions or ash when packaging is incinerated, or in leachate when packaging is landfilled;
4. Lead, mercury, cadmium and hexavalent chromium, on the basis of available scientific and medical evidence, are of particular

concern;

5. It is desirable as a first step in reducing the toxicity of packaging waste to eliminate the addition of these heavy metals to packaging; and
6. The intent of the legislation is to achieve this reduction of toxicity without impeding or discouraging the expanded use of post-consumer materials in the production of packaging and its components.

This model legislation has since been adopted by 10 states, namely, New York, Vermont, Connecticut, New Hampshire, Rhode Island, Maine, Wisconsin, Iowa, Washington, and Minnesota. The effective date varies from state to state. It calls for a gradual reduction of the allowable levels of heavy metals over the period of three years. The concentration level of lead, cadmium, mercury and hexavalent chromium is to be reduced to 600 ppm on the effective date, and further reduced to 250 ppm and 100 ppm over the next two consecutive years.

It is anticipated that addition to the the list of controlled substances will be made in the future.

A Certificate of Compliance stating that a package or packaging component is in compliance with the requirement of the legislation is required to be furnished by its manufacturer or supplier to its purchaser. The Certificate of Compliance shall be signed by an authorized official of the manufacturing or supplying company.

Each state adopting the model legislation has its own enforcement policies. However, giving

the example of the State of New York, violation of the Environmental Conservation Law (which is the title of the New York legislation which follows the Model Toxics Legislation) carries a civil penalty not to exceed US\$10,000 for the first violation, and a civil penalty not to exceed US\$25,000 for the second, and further violations.

U.S. environmental law is constantly changing. So much of it depends on political pressure at home and abroad. As popular attention to the environment increases in the future, the greater will the demand be for effective environmental protection. There is already a movement to abandon the EPA's 'command and control' policy and replace it with market-based mechanisms to create economic incentives for achieving environmental goals.

At this point it is not certain as to what extent this new policy shift would affect imports. An argument may be made that should economic incentives be given to U.S. manufacturers, it will artificially lower the cost of production, and thus constitutes an unfair competition to imported products.

On the international front whether 'the greening of GATT' will materialize depends to a great extent on the negotiation between the developed and developing nations.

Hong Kong manufacturers and exporters to the U.S. are well advised to keep themselves abreast with U.S. environmental laws. Failure to do so might place an unanticipated and undesirable future cost of doing business.

Digest of LEGISLATION

(This digests Legal Supplements to the GAZETTE Nos. 35/3 September to 45/12 November 1993.)

NOISE

Civil Aviation (Aircraft Noise) (Limitation on landing or taking off aircraft) (Amendment) Notice 1993 (L.S. to Gazette No. 43/29 October 1993 p.B1597) This notice amends and removes certain limitations on the time aircraft are permitted to land at Runway 13 or take off at Runway 31 at Hong Kong International Airport.

LAND USE PLANNING

Port Control (Excluded Water-Front) (Repeal) Order 1993 (L.S. to Gazette No. 35/3 September 1993 p.B1383) Declares the areas about the Tung Chau Street water-front and unleased Crown land at the old Yau Ma Tei Typhoon Shelter to be no longer an excluded water-front.

Port Control (Public Cargo Working Area) Order 1993 (L.S. to Gazette No.35/3 September 1993 p.B1384) An area of unleased Crown land situated at the old Yau Ma Tei Typhoon Shelter and the adjoining waters is replaced by another one situated at New Yau Ma Tei Typhoon Shelter as a public cargo working area.

Hong Kong Airport (Control of Obstructions) (Consolidation) (Amendment) (No.3) Order 1993 (L.S. to Gazette No. 39/30 September 1993 p.B1437) The height restriction is relaxed to permit Television Broadcasts Limited to construct a standby generator room and a fuel tank on a site at Pottinger Peak.

Antiquities and Monuments (Declaration of Historical Building) Notice 1993 (L.S. to Gazette No. 40/8 October 1993 p.B1465) This notice declares parts of the Main Building of The Helena May at No.35 Garden Road, Hong Kong Island to be a historical building for the purposes of the Antiquities and Monuments Ordinance (Cap.53).

WASTE

Waste Disposal (Amendment) Bill 1993 (L.S. No.3 to Gazette No. 41/15 October 1993 p.C1265) The aim of this Bill is to provide for better control over livestock farms and livestock waste. Measures include increasing the penalties for offences, giving more enforcement power and the declaration of livestock waste prohibition areas.

WATER

Sewage Tunnels (Statutory Easements) Ordinance (L.S. No.1 to Gazette No.44/5 November 1993 p.A1002) This Ordinance creates easements and other rights over land in favour of the Crown to facilitate matters related to the construction, maintenance and operation of sewage tunnels.

Corrigendum

In the August-September 1993 issue the digest of the commencement notice for the **Air Pollution Control (Amendment) Ordinance 1993** should have said sections 51, 55, 56, 58 to 63 and 65 to 80 of the principal Ordinance which deal with asbestos and specified processes numbered 25 and 27 to 31 in Schedule 1 to the principal Ordinance *have still not yet come into operation*. We are grateful to the Director of Environmental Protection for pointing out this error and apologise for any confusion we may have caused. *Eds.*

HONG KONG Briefing

ENVIRONMENT AND PUBLIC HEALTH

AIR QUALITY was poor in late August because of calm conditions and accumulated carbon particulates, especially from diesel engines. An EPD report revealed that the hazy conditions affected visibility and prevailed over 100 kilometres along the coast and up to two kilometres high into the atmosphere. Levels of nitrogen and total suspended particulates exceeded health standards in Mongkok and Kwai Chung by up to 23 per cent. (SCMP 15 September 1993)

DECENTRALISATION of EPD is taking place with the establishment of six regional offices to which over 1,000 Wanchai situated staff will soon be relocated. (SCMP 20 September 1993)

PUBLIC consultation on the Government's planned sewerage charges ended on 15 November. The charges will fund the \$12 billion sewerage programme to reduce pollution in Victoria Harbour which is estimated to cost \$900 million a year to operate. It is proposed to levy the charges through each user's water bill. Residential water bills are to rise by an average of \$15 per household. Fixed rates for commercial and industrial users will depend on the size of their water meters. (SCMP 21 & 23 September 1993)

A NUCLEAR emergency plan has been agreed between Hong Kong and Guangdong authorities. An agreement was signed on 22 September whereby Guangdong authorities will

notify Hong Kong of all nuclear emergencies and information will be exchanged on the nature and cause of accidents and weather conditions including regular updates of developments. It also provides for food to be tested for radioactive contamination before it is allowed to be exported from China (SCMP 23 September 1993)

A FLOOD CONTROL plan for the Shenzhen river which will require changes to the Hong Kong-Chinese border may fall through because of potential disputes over land ownership. The river needs to be straightened to prevent silting which has resulted in severe flooding during this year's heavy rains. Calls have been made for better communication and cooperation between Hong Kong and Shenzhen authorities to reduce the impact of flooding. They come in the aftermath of a release of water from Shenzhen reservoirs which contributed to recent flooding in the New Territories. (SCMP 30 September & 4 October 1993)

THE EPD has taken the lead in introducing 'green management' in Government departments and hopes business will follow suit. The Director himself will monitor and attempt to curb energy waste in the Department. (SCMP 9 October 1993)

SEVEN new marine parks and reserves will be declared and fishing as well as other activities harmful to marine life will be banned in them, according to the Department of Agriculture and Fisheries. Declaration of the new marine areas will take place in two stages: first, two areas in north-eastern New Territories and Cape D'Aguilar in southern Hong Kong and

second, and yet to be announced, a further area in the New Territories as well as south Lamma, south-west Lantau and Ping Chau. (SCMP 9 October 1993)

AIR QUALITY in September improved because of the stormy weather but Mongkok still recorded excessive levels of nitrogen dioxide early in the month. Emissions of sulphur dioxide from Hong Kong Electric's Lamma Island plant have been reduced by 90% since the installation of new de-sulphurisation process. However, levels of air pollutants in tunnels is still a cause for concern, prompting EPCOM to ask tunnel operators to turn ventilation fans up to capacity when pollution levels are high. (SCMP 13 & 27 October; 3 November 1993)

MEDICAL WASTE washed up on Hong Kong beaches may originate from Government clinics, according to evidence discovered among the rubbish by volunteers. Meanwhile, a dispute between the Hospital Authority and EPD continues to put the proposed medical waste incinerator further behind schedule. The two government departments cannot agree which waste should be treated like ordinary rubbish and which incinerated, at extra cost. (SCMP 8 & 22 November 1993)

PLANNING AND LAND USE

ENVIRONMENTALISTS have reacted angrily to the Government's decision to extend the licence of the Lamma quarry for two years.

The quarry was to close at the end of this year but the extension appears to be in response to a need for building materials for the Chek Lap Kok airport and Container Terminal Nine projects. The government has also granted the licensees approval to construct a casting basin for concrete tubes and the dredging of 15 million cubic metres of sand from the East Lamma Channel. (SCMP 12 October 1993)

TOWN PLANNING Board approval of guidelines governing the use of land adjacent to Mai Po Nature Reserve and Inner Deep Bay will allow the creation of two buffer zones to protect the two areas from urban encroachment. Meanwhile, a developer has proposed a what will no doubt be another controversial golf course project near Mai Po in exchange for building a nature reserve. (SCMP 10 & 17 November 1993)

Corrigendum

In the August-September 1993 issue of this *Report* it was incorrectly stated that the Hong Kong Government had agreed to move oil depots on Tsing Yi Island to the Soko Islands. However, we have been informed by the Director of Planning that there are 'neither firm plans nor any timetable at the moment for moving potentially hazardous installations in Tsing Yi to the Soko Islands although the latter may be an appropriate site for these facilities'. We apologise for any confusion the error may have caused. *Eds.*

'PADS' UPDATE

AIRPORT Finance Committee legislators have criticised the Government for using the contingency fund for advance

works connected with the airport railway. The fund is being used pending China's approval of the project when the Mass Transit Railway Corporation will be able to finance the railway project privately and reimburse the Government. Similar situations are thought likely to arise in highway works connected with the airport project. (SCMP 14 September 1993)

\$9 BILLION has been committed to highway development in 1994 but most of this is for new airport routes and the Tuen Mun highway. Only \$1 billion will be spent on other road improvement works. (SCMP 12 October 1993)

THE AIRPORT Consultative Committee continues to be racked by controversy as one pro-China member declined to renew his membership and China is still to give its blessing to the newly reconstituted committee. (SCMP 25 October & 2 November 1993)

FINANCIAL arrangements continue to cause concern as additional consultancy fees for PADS projects came to light. On an optimistic note, a senior Beijing official assured members of a preparatory committee on post-1997 Hong Kong that the airport talks could be resolved whatever the outcome of the Sino-British talks on Hong Kong's political system. (SCMP 6 & 16 November 1993)

Diary

(See *DIGEST OF LEGISLATION FOR DETAILS.*)

22 September: The Helena May at No.35 Garden Road, Hong Kong Island to be an historic building.

REGIONAL AND INTERNATIONAL

In September 1991 (see a digest of the decision in the November 1992 issue of the Report) the GATT dispute settlement panel held that a US restriction on imports of Mexican tuna which had been caught using fishing methods contrary to the U.S. Marine Mammals Protection Act was in violation of the GATT. Here we consider this decision and its implications for U.S. environmental legislation which attempts to restrict imports.

What is the GATT?

The main thrust of U.S. international trade policy is the GATT. The GATT functions as a forum in which the over 100 member countries discuss trade problems, negotiate reductions in trade barriers, and address other matters that distort competition. Member countries seek to liberalize trade by complying with GATT's most-favoured-nation Clause in Article I, and the national treatment Clause in Article III. These Articles work together to ensure that one member country accords all other member countries the same favourable treatment that it would give its own domestic industry, or any other country. Article II operates to limit the imposition of import tariffs in accordance with pre-negotiated levels.

When member countries disobey GATT's policies, parties engage in bilateral negotiations to reach a mutually acceptable settlement. If no settlement is reached then the matter is referred to a GATT dispute resolution panel.

The GATT's broad ranging

powers has profound implications for progressive environmental legislation. The U.S.'s international trade policy centred around the GATT has been considered a powerful barrier to effective environmental regulation. Environmentalists and protectionists contend that liberalised trade is directly proportional to environmental damage, and they demand the right to implement whatever trade measures they deem appropriate to rectify the problem. Whether the legislation is directed to a genuine environmental concern, or whether it is 'protectionist legislation dressed-up in environmentally-friendly clothing', if the legislation proposes a direct or indirect trade barrier, it is nonetheless susceptible to a GATT challenge as being an unfair trade measure. The controversy is best illustrated by the GATT dispute settlement panel's 1991 *Tuna-Dolphin* decision.

The Tuna-Dolphin Decision

For scientifically unknown reasons, herds of dolphin swim directly over schools of tuna. Fisherman would locate the dolphins as they surfaced to breathe, and they would set large purse seine nets on the dolphin herds to catch the tuna below. Dolphins became frequently entangled in the nets, died or became injured enough to become vulnerable to shark attack. Congress passed the **Marine Mammal Protection Act** to control this method of fishing. Statute violators were forced to deal with the broad sanctions of a tuna import ban. Was Congress concerned about dolphin preservation? Or was it concerned with protecting the U.S. tuna industry?

Mexico challenged the import ban as a violation of the

GATT's liberalized trade policy. The U.S. argued that the restrictions were justified under both exceptions found in Article XX of GATT. Article XX (b) states that trade measures may be undertaken if they are 'necessary to protect human, animal or plant life, or health'. Article XX(g) states that trade measures may be undertaken 'relating to the conservation of exhaustible natural resource is such measures are made in conjunction with restrictions on domestic production or consumption'.

'Environmentalists and protectionists contend that liberalised trade is directly proportional to environmental damage, and they demand the right to implement whatever trade measures they deem appropriate to rectify the problem.'

The GATT panel narrowly construed these exceptions, and found in favour of Mexico's claim for freer trade. Perhaps in fear of creating a fundamental loophole in the General Agreement, the panel took the unprecedented step of limiting the exception in Article XX(b) to measures necessary to protect human, animal or plant life, or health *within the jurisdiction of the party taking the measures*. The U.S. measures were considered to affect animal life extra-jurisdictionally. The panel also held that the measures were not 'necessary' under the meaning of Article XX(b) because the U.S. had not exhausted all other permissible methods under the GATT and had not chosen the least restrictive alternative, such as an 'international cooperative arrangement'. Finally, the panel

limited the exceptions to apply with regard to the end product and not the process by which the product was produced or harvested.

The Implications of Tuna-Dolphin

Does the *Tuna-Dolphin* decision render environmental protection measures nugatory? There is little doubt that the implications of the Panel's decision are broad and far-reaching. All current US environmental legislation, including the ones that affect Hong Kong manufacturers, that impede or restrict liberalized trade in any way are susceptible to GATT-Attack. The GATT's 'environmental' exceptions were narrowly interpreted. Only measures taken genuinely directed towards environmental concerns within the jurisdiction of the acting party are accorded the long-shot chance of survival.

Environmental groups and politicians have decried the possibility of 'faceless GATT bureaucrats' nullifying existing environmental legislation. Some U.S. Congressmen are attempting to pre-empt GATT rulings through Resolution H. Con. Res. 246 (Waxman-Gephardt). The resolution announces to the Administration and to U.S. trading partners that Congress will not approve any trade agreement which does not protect U.S. environmental, health, or labour law. In addition there is currently a proposal for an International Pollution Deterrence Bill that would impose import duties on countries that fail to comply with stricter environmental standards.

GATT executives contend that liberalized trade leads to a

**Comparative Table of Environmental Convictions:
August and September 1993**

	Number	First Offence	Second Offence	Third + Offence	Maximum Fine
Air	25 17	19 11	6 2	- 4	\$30,000 \$20,000
Dumping at Sea	8 11	3 7	2 2	3 2	\$ 4,000 \$ 5,000
Noise	16 8	14 6	1 1	1 1	\$15,000 \$20,000
Waste	4 -	4 -	- -	- -	\$ 2,000 -
Water	11 16	6 7	3 3	2 6	\$80,000 \$30,000
Ozone	1 -	1 -	- -	- -	\$10,000 -
Total	65 52	47 31	12 8	6 13	

*August figures appear on the first line and September figures on the second line of each item.
Source: EPD, Anti-Pollution Prosecution Figures (21 September & 19 October 1993).*

higher per capita income. A higher per capita income means that more of the national expenditure can be devoted to environmental concerns. The

GATT executives consider unilateral trade measures to be, at best, of dubious value and, at worst, counter-productive.

ABBREVIATIONS

- AFD Agriculture & Fisheries Department
- APCO Air Pollution Control Ordinance
- CFCs Chlorofluorocarbons
- EC European Community
- EPCOM Environmental Pollution Advisory Committee
- EPD Environmental Protection Department
- EXCO Executive Council
- FEER Far Eastern Economic Review
- HKU University of Hong Kong
- JLG Joint Liaison Group
- LDC Land Development Corporation
- LEGCO Legislative Council
- LS Legal Supplement
- NCO Noise Control Ordinance
- NT New Territories
- PAA Provisional Airport Authority
- PADS Port and Airport Development Strategy
- SCMP South China Morning Post
- SMP Sunday Morning Post
- WDO Waste Disposal Ordinance
- WPCO Water Pollution Control Ordinance

This report does not constitute advice of a legal nature. Whilst all effort has been made to ensure completeness and accuracy at the time of publication, no responsibility is accepted for errors or omissions. Further information, inquiries and advice in respect of this report should be directed to:

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