

URBAN PLANNING AND
ENVIRONMENTAL
LAW REPORT

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We begin the Year of the Rooster with a look back to the Year of the Ram for this issue features a review of the *1991 Annual Report* of Hong Kong's Town Planning Board. If this seems like old news please note that the 1991 Annual Report was published only in December 1992 and we are therefore not dragging our feet. In one way the Report makes a timely appearance. The tragic deaths of 21 revellers at the stroke of the New Year in decrepit godown area turned chic nightclub district Lan Kwai Fong should warn us of the dangers inherent in Hong Kong's history of haphazard urban planning and the need better to serve the various types of amenity required by the Territory's rapidly changing society.

Hong Kong Briefing surveys recent developments in environmental policy articulated during and after LEGCO's debate on the subject in December as well as the fortunes of PADS in the political aftermath of the Government's proposals for political reform.

The International section examines the Canadian position with respect to self-incrimination in cases of mandatory reporting of environmental incidents. It should be noted that the Hong Kong Bill of Rights Ordinance contains a provision against self-incrimination in criminal cases and when, in the fullness of time, similar mandatory reporting features are introduced in Hong Kong the Canadian law will become required reading.

The Editors

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Town Planning Board: 1991 Annual Report

CONSERVATIONISTS and developers alike have recently accused the Planning Department of dragging its feet. (See *Hong Kong Briefing: Planning and Land Use* in this issue.) It seems that the Town Planning Board has also been somewhat dilatory in producing its 1991 Annual Report only just before 1992 was another memory.

Whilst its bilinguality is to be applauded the 122 page report is really only half that long and two chapters out of eight are devoted to the composition of the two planning committees, complete with group photographs of the members as well

as various snaps of them 'at work'!

Nevertheless, the Report is a useful insight into how Hong Kong's planning policies are practised by the Board. In particular, Part C contains ten 'selected cases' of planning applications and objections to zoning plans. It is not clear how representative these cases really are but even accounting for a measure of self-censorship they make interesting reading and we will return to some of them in detail later.

The work of the Board consists of, first, 'preparing' outline zoning plans (OZPs), which provide the basic framework for urban and new town land

development, and development permission area (DPA) plans, which are the basis of applying for planning permission and are effective for three years. The Board also hears objections to these plans and submits them, amended where desirable, to the Governor in Council for approval.

In 1991, a total of 496 objections were received (including 23 objections to OZPs, 407 to Development Scheme Plans and 66 to DPA plans) of which preliminary consideration was given to 368 objections. On this basis the Board decided to amend four OZPs and three objections were consequently withdrawn.

The Board's second function is to consider planning applications and, in the event, review its decisions. In 1991 it considered a total of 398 planning applications (including 312 applications for change of use and approval of master layout plans under OZPs and 86 applications for development in DPAs).

From the statistics presented in Figure 6.1, reproduced here from the *Report*, it will be seen that overall 58 percent (or 231) of applications were approved although the rate of approval was relatively higher in the case of applications for development under OZPs. In real terms, the overall approval rate was also unchanged over 1990.

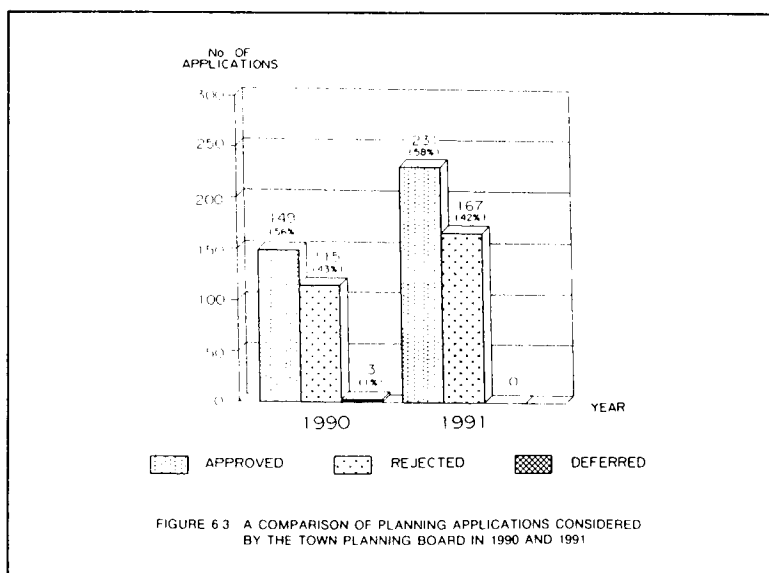
The Board also reviewed its decisions in 47 cases. Of those, 33 applications (70%) were rejected, 13 (28%) allowed and 1 (2%) deferred. Although fewer reviews were conducted in 1990 the rejection rate in 1991 increased by 12 percent.

Of the seven selected planning application cases, six were refused planning permission but, after review, three appli-

cants were granted permission subject to conditions. These three cases are worth studying because they appear to show that the Board is prepared either to approve a modified application which satisfies its objections or even to go about and reverse its initial decision.

Where the result of an application is that the Board has reservations it would have been a more efficient use of time for the applicant to have had a dialogue with planners so as to present a satisfactory plan the first time and obviate a review. The fact that such a procedure does not seem to be working in Hong Kong, as it does in local government in many commonwealth countries, is clearly a defect in the planning system.

The only case to be taken to and rejected by the Governor in Council concerned a proposed commercial/residential development with open space on a site zoned 'Open Space'. The Board rejected the application on the grounds that the development would reduce open space and increase the local population. Its decision was clearly motivated by two factors. First, the Urban Council had already planned to resume the site, and secondly, experience showed that open space within private developments are not properly managed and therefore could not be properly used by the public. Although the net loss of space was calculated at only a tiny 166.5m² the Board thus preferred a policy of publicly



Finally, although it shows great integrity to be able to admit that one was wrong, it does seem extraordinary that the Board could in one case refuse permission on the grounds that the site was too small for a properly designed office building and would adversely affect traffic in the vicinity but on review say that the development of a commercial building in the area was part of a desirable trend and the consequences on traffic would be insignificant.

owned and managed open space despite the enormous public cost. Perhaps this suggests measures are necessary to regulate the private management of open space in Hong Kong so that Government, and through it the public, is able to take advantage of such planning gains more fully in the future.

For a report which is aimed at the interested public the Town Planning Board's 1991 *Annual Report* is not only late but also rather thin on the ground.

Digest of LEGISLATION

(This digests Legal Supplements to the Gazette Nos. 46/13 November 1992 to 3/21 January 1993.)

MERCHANT SHIPPING

Merchant Shipping (Prevention and Control of Pollution) (Specification of Substances) (Amendment) Order 1992 (L.S. No. 2 to GAZETTE No. 48/27 November 1992 p. B1328) This Order replaces the list of substances other than oil specified as pollutants for the purpose of Part III of the Merchant Shipping (Prevention and Control of Pollution) Ordinance (Cap. 413), the provisions of which authorise emergency action to be taken where there is a risk of pollution from a shipping casualty. Part 1 of the Schedule contains a list of 176 noxious liquid substances carried in bulk; Part II lists 56 harmful substances or their derivatives carried in packaged form; Part III lists radioactive materials; Part IV lists 12 liquefied gases carried in bulk.

OZONE

Ozone Layer Protection (Amendment of Schedule) Order 1992 (L.S. No. 2 to GAZETTE No. 47/20 November 1992 p. B1297) This Order amends the Schedule to the Ozone Layer Protection Ordinance (Cap. 403) to bring a total of 12 additional ozone layer depleting substances under the control of the Ordinance, including 10 CFCs and Methyl chloroform as of 1 January 1993, and carbon tetrachloride, as of 10 August 1993.

Ozone Layer Protection (Amendment) Bill 1993 (L.S. No. 3 to GAZETTE No. 2/January 1993 p.C44)

The purpose of this Bill is to allow further controls on ozone depleting substances to be

imposed so as to meet the deadline for compliance with the 1987 Montreal Protocol. New measures include reducing (and eventually banning) the import of certain CFCs, prohibiting the venting of CFCs and providing for their conservation and recycling. The proposed law does not include taxation of CFCs which had been proposed by the EPD as well as environmental groups to encourage recycling.

PUBLIC HEALTH

Smoking (Public Health) (Notices) (Amendment) (No. 2) Order 1992 (L.S. No. 2 to Gazette No. 53/December 1992 p. B1415) This Order replaces an earlier order by prescribing the wording and design of (1) no smoking signs; (2) health warning notices to be used on cigarette packets and tobacco retail containers, and (3) tobacco advertisements, including four new prescribed forms of health warning which must be used with equal frequency and a stipulation that the area for the health warning must occupy at least 20% of the surface on which it is displayed. The new provisions will come into effect on a date to be notified in the GAZETTE.

WASTE

Waste Disposal (Chemical Waste) (General) Regulation (L.N.20 of 1992) (Application of Regulation 4 and Parts III, IV, V and VI) Notice 1992 (L.S. No. 2 to GAZETTE No. 46/13 November 1992 p. B1278) Appoints 18 November 1992 as the day on which regulation 4 and Parts III, IV, V and VI of the Regulation shall apply to chemical waste being or containing asbestos, polychlorinated biphenyls or chromium bearing solid tannery waste.

WATER

Water Pollution Control (Amendment) Bill (L.S. No. 3

to GAZETTE 48/27 November 1992 p. C1457) The purpose of this Bill is to amend the Water Pollution Control Ordinance to improve its enforcement effectiveness and to add regulation-making powers necessary for the construction of sewerage and related works for the control of water pollution. This would be the second major amendment to the Ordinance since it was passed in 1980. The first major amendment took place in 1990. Of particular interest in the Bill is the introduction of imprisonment for up to two years as a penalty for offenses under sub-ss. 9(1) or 9(2) of discharging any poisonous or noxious matter into a communal sewer or drain as well as increasing the maximum fine to \$500,000. This mirrors similar proposals under the Air Pollution Control (Amendment) Bill earlier in 1992 and will test the will of Hong Kong's legislators to impose heavy penalties on polluters.

Diary

(See DIGEST OF LEGISLATION for details.)

18 November 1992: reg. 4 and Parts III, IV, V and VI of the **Waste Disposal (Chemical Waste) (General) Regulation** shall apply to chemical waste being or containing asbestos, polychlorinated biphenyls or chromium bearing solid tannery waste.

18 November 1992: the new schedule of substances other than oil specified as pollutants for the purpose of Part III of **(Prevention and Control of Pollution) Ordinance** (Cap. 413).

1 January 1993: 10 CFCs and Methyl chloroform are added to the Schedule of the **Ozone Layer Protection Ordinance** (Cap. 403).

CASELAW Update

Gibbons et al. v. South West Water Services Ltd. (English Court of Appeal, Times Law Report 26 November 1992) *Contaminated drinking water supplied by a statutory body - arrogant and high-handed attitude to customers' complaints - wilful misrepresentation of water quality - breach of statutory duty - public nuisance - exemplary and aggravated damages.*

The defendants, now privatised, were at the relevant time a statutory body under a duty to maintain a system at its treatment works for the supply of drinking water. An action by 180 plaintiffs who had drunk contaminated water supplied by the defendants sought exemplary and aggravated damages because employees of the defendants had acted in an arrogant and high-handed manner in ignoring customer complaints, had wilfully misled them by asserting that the water was safe to drink and had withheld accurate information about the water quality and the necessity to take precautions to minimise the ill effects of drinking it. On appeal by the defendants from a refusal to strike out the relevant paragraphs of the statement of claim seeking exemplary and aggravated damages the Court of Appeal allowed the appeal.

The principal judgment was delivered by Stuart-Smith, LJ with whom Simon Brown, LJ agreed. The Master of the Rolls delivered a concurring judgment. *Held:* (1) Before an award of exemplary damages could be made by any court or tribunal the tort must have been one in respect of which such an award was made prior to the decision of the House of Lords in *Rookes v. Barnard* in

1964. As there was no case prior to this time of exemplary damages being awarded to a plaintiff who proved particular damage resulting from public nuisance and as his Lordship would not extend the remedy to such a case the plaintiffs' collective claim could not stand.

In any event, this case did not fall within either of the categories laid down by Lord Devlin in *Rookes v. Barnard*. First, in this case it could not be argued that the defendants' employees were discharging executive power derived from government. Secondly, the defendants did not continue the nuisance for the purpose of pecuniary gain or other advantage, rather what the plaintiffs pleaded was that the defendants attempted by their behaviour to cover up a tort. Moreover, the punitive element of exemplary damages would be impossible to calculate in a case of multiple plaintiffs unless all their claims were quantified by the court at the same time.

(2) The claim for aggravated damages should also be struck out because even if the nuisance prolonged unnecessarily by the defendants' conduct added to the plaintiffs loss, including anxiety and distress, this could be adequately compensated by general damages. Anger and indignation was not a proper subject for compensation as it was neither pain nor suffering.

HONG KONG Briefing

ENVIRONMENT AND PUBLIC HEALTH

ENVIRONMENTAL policy was clearly the focus in December, culminating in the LEGCO debate on a new approach to Hong Kong's envi-

ronment. However, with all but 22 seats of the chamber vacant during the leading motion speech by CRC member and LEGCO environmental convenor, Peter Wong Hong-yuen, it is perhaps premature to say, as did the editors of the SCMP, that there was 'broad cross-party support' for the new approach and 'an encouraging reflection of the increasing maturity of Hong Kong society'.

It is true that all 18 legislators who spoke supported the idea of another environmental policy review as well as new policies on conservation and sustainable development. Some also supported an integrated approach to the environment rather than as at present dealing piecemeal with related issues such as pollution, planning and conservation. (SCMP December 1992)

The Government's response, as might have been expected, was qualified. Despite LEGCO's vote in favour, Hong Kong may not be able to ratify the conventions on biodiversity and climate change done at the Earth Summit (*see* July issue) because Hong Kong is not a sovereign state and might not be able to meet the economic obligations created by the conventions. (SCMP 3 December 1992)

Nevertheless, the Government did support the objectives of the conventions and had set up a committee to study biodiversity goals in country parks policy. Moreover, the new committee to conduct the biennial review of environmental policy will discuss conservation and sustainable development as well as immediate pollution problems. As part of the plan to encourage business to audit its environmental compliance two government departments will also conduct environmental

audits in 1993. (4 & 29 December 1992)

AFTER COMPLAINTS by nearby residents, the EPD revoked the construction noise permit held by the contractors at the Hong Kong Stadium project and has commenced proceedings because violating its terms by operating more equipment between 7 and 11pm. than was permitted. (SCMP 21 January 1993)

DREDGING and dumping at sea have remained the most controversial water pollution issues in the news. Silting in Mirs Bay is blamed on dredgers at Ninepins Islands several kilometres away. (SCMP 27 November 1992) China continues to complain that dumping in Hong Kong waters is seriously affecting fishing and fish farming off Guangdong. (SCMP 23 November 1992; 1 January 1993) But the EPD hopes that computer monitoring devices newly installed on dumping barges will lead to a decrease in 'short dumping' *ie.* dumping outside permitted areas. (9 January 1993)

A SEWAGE PLANT to screen Kowloon sewage was finally opened in December, ending a 20-year-old plan to treat sewage before it falls into Victoria Harbour. Opening the plant, the Governor admitted the poor state of water quality in Victoria Harbour and the need for more measures to clean it up. (SCMP 19 December 1992)

1992's WINNER of the Governor's Award for Environmental Protection was a paper mill which recycles paper boxes. The mill which uses 100 percent waste cardboard recycles more than 7,000 tons of waste every day but uses only 11 tonnes of water for each tonne of paper produced. (SCMP 10 December 1992)

MEDICAL WASTE is being dumped into Hong Kong's landfills along with household rubbish, triggering a dispute between EPD and the Hospital Authority. Only 25 percent of medical waste is being incinerated but the HA does not agree with EPD that a purpose built incinerator is warranted for Hong Kong's medical waste. (11 December 1992)

40 CUBIC METRES of radioactive waste in rusting containers in a Wanchai tunnel since 1965 are in need of a new home. Not surprisingly, searches by Hong Kong's town planners have found nobody wants the waste stored near them. (SCMP 21 December 1992)

AIR QUALITY for December 1992 showed nitrogen dioxide and total suspended particulates in Mongkok were again well above acceptable levels. NO₂ and TSP are chiefly a product of diesel exhaust prompting calls for a reduction in the number of diesel powered vehicles. (SCMP 14 January 1993)

AIRBORNE TOXINS which can cause cancer such as ethylene dichloride and benzo-alpha-pyrene have increased in Hong Kong, in some cases exceeding recommended levels. The chemicals, which also include arsenic and heavy metals, were mainly industrial by-products. The EPD is investigating. (SCMP 11 January 1993)

CFC REDUCTION targets should be just within Hong Kong's reach, according to an EPD official, but the Government will regulate but not tax CFCs, which are a major cause is ozone layer depletion. (SCMP 27 November 1992; 4 & 16 January 1993; see also *Digest of Legislation* in this issue for details of draft legislation.)

PLANNING AND LAND USE

PRESSURE FROM residents to extend the MTR to relieve growing transport needs in west New Territories is growing, led by Meeting Point legislator Zachary Wong Wai-yin who criticised Government for failing to synchronise transport infrastructure with new town development. Once the Tin Shui Wai new town is developed population in the area is expected to grow to about 900,000. (SCMP 23 & 26 November 1992)

SHALOTUNG VALLEY has been included in a new town area but the official planning programme nevertheless designates the valley as a 'recreation priority area' and estimates population at 1,900 in the next century. However, no conclusions are being drawn in public about the controversial private development proposals which included a golf course and housing plan but were stymied by an environmental court challenge last year. (SCMP 5 December 1992)

IN DISCOVERY BAY meanwhile Hongkong Resort is proposing a \$1b., 15,000 person residential scheme which includes building a road tunnel to the proposed Lantau expressway. (SCMP 8 December 1992)

LAND USE CONTROLS in the New Territories are still frequently not enforced, according to criticisms of the environmental lobby, despite the fact that town planning laws were extended there over 18 months ago. Admitting 'some problems in enforcement' the Secretary for Planning, Environment and Lands nevertheless denied that the Planning Department was dragging its feet pointing to legal

procedures which must be followed. However, no prosecution has yet been brought since town planning laws became enforceable in July 1991. (SCMP 7 & 15 December 1992)

DEVELOPMENT interests meanwhile accuse the Government of being too casual about freezing land use. The incoming president of the Hong Kong Institute of Architects that by broadly designating land as a Comprehensive Development Area the Government was unnecessarily delaying development in many areas which are not environmentally or infra-structurally sensitive. (SCMP 11 January 1993)

'PADS' UPDATE

SINCE the last update on PADS the Government's revised financial package has been approved by LEGCO with a \$2b. cut from \$8.6b to \$6.69b exacted by legislators at the crucial vote just after the December issue went to press. Funding was approved by a margin of only two votes on 27 November despite attempts by conservatives to adjourn debate of the funding request in the Financial Committee. (SCMP 28 November 1992)

PRC PRESSURE on the Hong Kong Government to scale down PADS consequently intensified and was overshadowed only by the controversy over the proposals for political reform before 1995. Despite the Governor's stated intention of not allowing the reform package to become linked with PADS, China continues to undermine the Government's ability to see the project through by making repeated statements linking PADS with PRC political policy. Such statements have included making the award of contracts and concessions which straddle

1997, such as the Container Terminal 9, subject to PRC approval as a matter affecting their legal validity, and making all such agreements subject to PRC foreign policy, whether or not they straddle 1997. Intergovernmental PADS financing talks have thus remained stalled. (SCMP

POLITICAL TEMPERS have overflowed into the Airport Consultative Committee which ended its first plenary session in months with fiery exchanges and a pro-China member walking out of the meeting. (SCMP 8 December 1992)

BIDS FOR CONTRACTS for up to 30 projects will be invited early this year, according to the PAA, despite the deadlock between Britain and China over funding approval and the continued political controversy. (SCMP 29 December 1992)

THE NEW YEAR began on a positive note with a vice-mayor of Shenzhen saying that the Shenzhen and Chek Lap Kok airports would not be in competition with each other and nor would Hong Kong's Container Terminal 9 and the proposed Yantian port in Shenzhen. (SCMP 13 January 1993)

REGIONAL AND INTERNATIONAL

CANADA

(Earlier issues have discussed the nature and consequences of conducting an environmental audit. Here we will consider the circumstances in which a party may be required to report a environmental problem, which may have come to light as a result of an audit, to the Ministry of the Environment ('MOE') and the consequences of making a report.)

The difficulties which can arise in connection with making a report are well illustrated by the prosecution of Amoco Fabrics and Fibres Ltd in May

1992. Amoco was prosecuted for polluting groundwater at its textile and carpet manufacturing site. The charges arose because, in 1988, Amoco voluntarily undertook a comprehensive environmental audit which identified potential groundwater contamination from the storage of waste oils, spent solvents and residues and thereupon reported the problem to the MOE. Despite Amoco's disclosure and compliance with measures to deal with the problem, the MOE proceeded to charge Amoco with causing or permitting contaminant discharges. In the event, the court accepted Amoco's defence that it had acted with due diligence in addressing the contamination and taking remedial action but the case highlights serious consequences of reporting an environmental problem to the MOE.

When does the law require a report to be made to the MOE? Who is required to make the report?

Statutory Obligations

The Ontario Environmental Protection Act contains statutory provisions requiring that, when a discharge of contaminant occurs, it must be reported to the MOE by any person (including a corporation) who causes or permits the discharge. Any party in a position to prevent the discharge who fails to do so would be subject to the duty to report.

A 'spill' (the discharge of a pollutant from a container or vehicle) must be reported immediately to the MOE. In addition to the party who causes or permits the spill, any party with 'control' of the pollutant at the time of the spill (which could include the transporter, dispatcher or the intended recipient of the substance) must make a report to the MOE. Any police officer

or public servant who is called to investigate the spill is also required to report it unless the MOE has already been notified.

There is a *de facto* obligation to report discharges and environmental contamination in the context of a decommissioning of a site in accordance with the Site Remediation and Decommissioning Guidelines issued by the MOE. Although these guidelines do not have the force of law they are enforced through the system of Director's Orders and breach of an order can result in prosecution. The Guidelines require consultation with the MOE in the course of planning and executing the decommissioning of a facility to ensure that clean up is effected to the appropriate standard.

Unless the property is being decommissioned, there is no obligation on a party to report historical contamination to the MOE. This means that, unless there is a spill or an ongoing discharge of a contaminant into the natural environment (such as leachate from wastes at the site or effluent discharges or air emissions exceeding applicable standards) there is no general obligation to notify the MOE if a party expects that it may be contaminated.

Notwithstanding the absence of a general legal obligation to report environmental contamination, there are certain parties who may consider it appropriate to notify the MOE of an environmental problem. Consultants who are professional engineers are required by their code of ethics to correct or report a situation they believe may endanger the safety and welfare of the public. An environmental consultant may therefore report a situation of non-compliance to the MOE if a client refuses or neglects to

take appropriate action. In such cases, there may be a conflict between the duty of confidentiality owed to the client and what is perceived to be an overriding public interest.

Other parties, such as land owners, tenants, creditors and their agents may also consider whether to notify the MOE about the contaminated condition of land they occupy or hold as a security. Although there may be no obligation to notify the MOE, a report may be considered in an effort to solicit the MOE's assistance in requiring a problem to be rectified by the responsible party, or alternatively to obtain the MOE's cooperation and assurances prior to taking possession or control of security. Such approaches should be made to the MOE with caution, after seeking appropriate advice and recognising that once a matter is reported there is a risk that it may take on a life of its own at the Ministry.

Reporting and the Risk of Self-Incrimination

Where facts about an environmental problem arise from a voluntary environmental audit or a report to the MOE there is a risk of self-incrimination. The question of legal privilege in respect of documents connected with an audit was considered in the last issue, especially the decision in *Bata Industries*. Where a report has actually been made to the MOE, can the information reported subsequently be used as a basis for prosecuting the party who made the report? In *R. v. Weil's Food Processing Ltd.* the Ontario court held that it would violate the accused's right to remain silent under the Canadian Charter to require notice of a discharge to be given and then to use the information to prosecute for the discharge.

Although the law may thus prevent information which is required from being used as evidence, this does not prevent the MOE from using the information to initiate an investigation (as occurred in the Amoco case). Accordingly, it is wise to obtain legal advice before volunteering information to the MOE which may disclose a violation of environmental standards.

Employee Whistle-Blowing

The duty to report a discharge applied both to corporations and their employees. Employees have been prosecuted along with their employers where a report was required but not made. In such cases, the courts have inquired into whether the discharge or spill was within the individual employee's sphere of responsibility.

Even where there may be no legal obligation to notify the MOE about an environmental problem, an employee may decide to report the employer's environmental non-compliance to the MOE. The Environmental Protection Act prohibits employers from dismissing, disciplining, penalising or coercing an employee for complying with the Act and other legislation pertaining to environmental protection. Where an employer violates the anti-retaliation provision, a complaint may be made to the Ontario Labour Relations Board.

In conclusion, corporations and their employees should be aware of their affirmative duties to report discharges and spills of contaminants into the natural environment. As part of a company's environmental due diligence, a spills reporting and response procedure should be established. Discharges of contaminants, including air emissions and effluent discharges, should be carefully monitored to ensure that appli-

Table of Environmental Convictions: December 1992

	Number	First Offence	Second Offence	Third + Offence	Maximum Fine
Air	27	17	8	2	\$12,000
Dumping at Sea	3	2	-	1	\$ 2,500
Noise	11	7	4		\$25,000
Waste	Nil				
Water	16	10	5	1	\$40,000
Ozone	Nil				
Total	57	35	17	4	

Source: EPD, Anti-Pollution Prosecution Figures (19 January 1992).

cable standards are not exceeded. The failure to make a report which is required by the

legislation can lead to prosecution of employers and their responsible employees.

ABBREVIATIONS

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
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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