

**URBAN PLANNING AND  
ENVIRONMENTAL LAW  
QUARTERLY**

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The increasingly serious plight of Hong Kong's fauna and flora is the subject of our main feature in this issue. We look at aspects of Hong Kong's Animal and Plants (Protection of Endangered Species) Ordinance (Cap. 187), which was amended recently to introduce (inter alia) heavier penalties and a new classification of "highly endangered species".

By way of comparison, we also refer to the corresponding US legislation (and its application by the US courts) and the recently enacted Australian Endangered Species Protection Act.

The comparative table of environmental convictions and penalties reveals a continuing trend of some magistracies to treat environmental offences very lightly; e.g. Western, 9th offence of failing to abate an air pollutant nuisance, fined \$4,000 (the same fine as imposed for that defendant's 8th offence).

The Editors.

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**PROTECTING OUR  
ENDANGERED SPECIES:  
IS THE ENDANGERED  
SPECIES ORDINANCE  
EFFECTIVE?**

More than ever the tragic plight of Hong Kong's endangered species of fauna and flora is within the glare of public scrutiny. Notwithstanding the traditional apathy of our community to such fundamental environmental issues as the protection of our wildlife from extinction, there recently have been several newspaper articles and television stories reminding us of the extent to which our activities have put at risk the very existence of certain species, (and many are already extinct).

Examples include:

- the on-going destruction of the endangered Chinese pink dolphins feeding grounds as a result of (especially) the new airport works (which also have directly, adversely affected other species, such as the Romer frog's habitat)
- the cruel and prolific slaughter of sharks to satisfy our liking for sharks'-fin soup
- a significant reduction in the king crabs' population, directly attributable to widespread pollution of Hong Kong's marine waters
- Dr. Amanda Vincent, an eminent visiting marine biologist, warned of the serious threat to the population viability of

seahorses within regional waters, due to massive harvesting for the Chinese market

- Repeated reports of the destruction of coral, fish stocks and other marine life due to pollution, dumping and marine sand dredging

Hong Kong's main piece of legislation aimed specifically at protecting endangered (and other) fauna and flora is the Animal and Plants (Protection of Endangered Species) Ordinance (Cap. 187) (ESO). Other legislation may also directly or indirectly afford a level of protection for fauna and flora - such as the Country Parks Ordinance, the Waterworks Ordinance (Cap. 102) and the various anti-pollution ordinances - but ESO is the primary source of statutory provisions directed to preventing the extinction of Hong Kong's (and other, non-native) animals and plants. However, unlike comparative legislation in other western countries, ESO is directed only at *trading* or *possession* of species. There are no provisions aimed at protecting the *habitat* of the subject animal or plant.

The ESO provides two categories of protection: *scheduled animals and plants* and *highly endangered species*. In each case the plants and animals protected are specified in the schedules to ESO. They include many species not found in Hong Kong (such as dugongs, Asia elephants and Amazonian manatee).

The *highly endangered species* category was added by a recent amendment to ESO (No. 3 of 1995). The amending ordinance also introduced 2 levels of penalty for offences involving *scheduled species* and *highly endangered species* with higher penalties (e.g. 1 year imprisonment, for *highly endangered species* versus 6

***In what may be seen as a reaction to the well-publicized international trade in rare and endangered animal parts, the 1995 amendment introduces a new offence of "commercial" offences. Section 13A provides that an offence under Sections 4, 5 or 6 committed for a 'commercial purpose' will, in effect, be treated much more seriously***

months) imposed for *scheduled species* (plus/or fines)).

The principal offences created by ESO are found in sections 4, 5 and 6 which respectively prohibit (without licence, which may be granted by the Director of Agriculture and Fisheries - Section 7) the import, export and possession of *scheduled* or *highly endangered species*.

In what may be seen as a reaction to the well-publicized international trade in rare and endangered animal parts, the 1995 amendment introduces a new offence of "commercial" offences. Section 13A provides that an offence under Sections 4, 5 or 6 committed for a 'commercial purpose' will, in effect, be treated much more seriously.

The penalties provided are:

Offence involving a scheduled species: -  
fine \$500,000  
imprisonment - 1 year

Offences involving an endangered species: -

fine \$5 m  
imprisonment - 2 years

As mentioned, nothing in ESO prohibits the destruction of the critical habitat of the species in question, or, indeed, the destruction of the creature or plant itself!

The directly corresponding legislation in the United States (there are many other federal acts under which species and their habitat may be protected - such as the Wilderness Act and the Wild and Scenic Rivers Act) is The Endangered Species Act, 16 U.S.C., Ss. 1531-1544 (ESA) (replacing the Endangered Species Act of 1966)

In the view of the majority of the U.S. Supreme Court (in *Tennessee Valley Authority v Hill* (1978) 437 U.S. 153) the fate of a previously unknown species of fish, the snail darter, was a reason for Congress' enactment of ESA. The snail-darter was discovered in a Tennessee river which was due to be inundated following the completion of a dam by the Tennessee Valley Authority. This would have wiped out the only known *habitat* of the snail darter.

ESA allows private citizens to petition the secretary of the Interior to list a species as endangered. The plaintiffs in the TVA case did that, and the secretary eventually listed the snail darter.

The result of such listing, then, and under the current provisions, meant that all federal agencies were required "to ensure that actions authorized, funded, or carried out by them do not jeopardize the continued existence" of an endangered species or "result in *the destruction or modification of habitat of such species*" (Section 7) (emphasis added).

The evidence in the TVA case overwhelmingly indicated that

completion of the dam (on which approximately US\$56m had already been spent) would cause complete destruction of the snail darters' habitat. The Court of Appeals and the Supreme Court held that the provisions of Section 7 of ESA were both clear and mandatory, and the TVA was permanently restrained from completing the dam (although it subsequently proceeded under specific enabling legislation). The Chek Lap Kok Airport project, and its numerous adverse effects on Hong Kong's fauna and flora, is an interesting (and telling) comparison.

Thus, the thrust of ESA is protection of designated critical habitat of the species concerned. The Secretary is directed to define the 'critical habitat' of the species in question, referring to criteria set out in the Act. [Rather regressively, these criteria now include *economic* factors, reflecting the anti-environment influence of the Republicans.] A contemporary example of the effectiveness of this legislation is the "Spotted Owl Case" which is currently being litigated. Interim injunctions have put a stop to clear-cutting of all of the remaining old-growth forests of the north-west of America (some 2.5 million acres) which have been identified as critical habitat of the Northern Spotted Owl, a listed endangered species.

In Australia, the Endangered Species Protection Act came into force in 1992. Like ESA, this Act (ESPA) provides for the preservation of the *habitat* of the relevant, endangered species. ESPA goes further, however, in that it provides for the protection of not just individual (native) species but also entire *ecological communities*. An *ecological community* is defined as "an integrated assemblage of native species that inhabits a particular area in nature". (Sec. 7) Such a community is

*endangered* where "it is likely to become extinct in nature unless the circumstances and factors threatening its abundance, survival or evolutionary development cease to operate" (Sec. 7).

ESPA also allows private citizens to propose ecological communities for listing (Sec. 5). Whilst by no means perfect, or even largely satisfactory, at least the American and Australian legislation recognise the crucial importance of *habitat*, and its protection, to the overall viability of indigenous species of flora and fauna. This is a separate issue to prohibiting, trade in other countries endangered species (e.g. ivory), to which ESO is directed, but, any meaningful law aimed at preventing the extinction of species should address both sources of danger to those species the legislation seeks to protect, i.e. direct destruction (such as is caused by poaching for trade) and destruction or impairment of critical habitat. Sadly, the unfolding fate of the Mai Po Marshes will show us just how desperately we need that legislation (and its *effective* enforcement)!

## Digest of LEGISLATION

### AIR

**Air Pollution Control (Vehicle Design Standards) (Emission) (Amendment) Regulation 1995** (L. S. No. 2 to GAZETTE No. 7/1995 dated 17 February 1995 /L. N. 37 of 1995 P. B159) The principal effects of these amendments (effective 1st April, 1995 (other than g.14(c) and 1st October, 1995 (Sec. 14(c)) are -

(a) to impose a vehicle design standard for smoke emission for vehicles equipped with a compression-ignition engine and first registered on or after 1 April 1995;

(b) to revise (by significantly amending Regulation 7 and Schedule 2 (inter alia) the vehicle design standards for emission of air pollutants applicable to certain vehicles first registered on or after 1 January 1992;

(c) to include new vehicle design standards for emission of air pollutants for certain vehicles first registered on or after 1 April 1995.

### WATER

**Dumping at Sea Ordinance (Ordinance No. 18 of 1995) (Commencement) Notice 1994** (L. S. No. 2 to GAZETTE No. 13/1994 dated 31 March 1995 /L. N. 131 of 1995 p. B480) The Ordinance other than Part V came into effect on 1 April 1995.

**Sewage Services (Sewage Charge) (Amendment) Regulation 1995** (L. S. No. 2 to GAZETTE No. 15/1995 dated 13 April 1995 /L. N. 143 of 1995 p. B536) The purpose of this Regulation is to change from 80% to 70% the percentage of water supplied used in determining sewage charges for a trade, business or manufacture listed in the Schedule to the Sewage Services (Sewage Charge) Regulation (L. N. 59 of 1995).

**Sewage Services (Trade Effluent Surcharge) Regulation** (L. S. No. 2 to GAZETTE No. 8/1995 dated 24 February 1995 /L. N. 60 of 1995 p. B214) The purpose of this Regulation is to establish the trade effluent surcharges under the Sewage Services Ordinance (105 of 1994).

**Sewage Service Ordinance (105 of 1994) (Commencement) Notice 1995** (L.S. No.2 to Gazette No. 12/1995 dated 24 March 1995/L.N. 115 of 1995 p. B400) This Ordinance, other than section 395, came into operation on 1 April 1995.

**WASTE DISPOSAL**

**Waste Disposal (Charges for Disposal of Chemical Waste) Regulation** (L. S. No. 2 to GAZETTE No. 5/1995 dated 3 February 1995/L. N. 30 of 1995 P. B115) This Regulation specifies the charges payable to the Director of Environmental Protection for the disposal of chemical waste at the Chemical Waste Treatment Centre.

**Waste Disposal (Amendment) Ordinance (Ordinance No. 14 of 1995)** (L. S. No. 1 to GAZETTE No.7 dated 17 February 1995 p. A176) These amendments:-

- (a) repeal the prohibition on import of waste in Hong Kong (section 20);
- (b) add PART IVA (ss. 20A to 20I) dealing with the control of the import and export of waste into Hong Kong;
- (c) add new sub-sections (ss. 21(6) to (7)) mandating that a waste disposal licence shall not be granted by the licensing authority where he considers the waste collection or disposal operation will not be able to achieve all the limits, objectives etc prescribed in the Air Pollution Control Ord. (and other specified legislation).
- (d) add new provisions (section 24(1)(b), (ba) and (bb) in which a person who is aggrieved by any direction or decision of public officer or a collection authority or waste disposal authority may appeal to the Appeal Board;
- (e) extend the term of appointment of Chairman from 2 years to 3 years (section 25(3));
- (f) allow for panel member to be reappointed but not more than 3 years (section 25(4A));
- (g) impose service charges for

waste treatment (section 33 (1) (j)); provide for different levels of charges for waste transfer and special charges in emergency or accident waste treatment; to impose surcharge which is not exceeding 20% of unpaid charges; and provide recovery of charge (including the surcharge) provision ( section 33 (1B)); and

(h) add new schedules (Sixth and Seventh schedule) regarding the kinds of waste to which sections 20A(1)(a) and 20B(1)(a) apply.

**HONG KONG Briefing**

*ENVIRONMENT AND PUBLIC HEALTH*

**RADON** gas is a deadly carcinogen which accounts for 13 per cent of cases of lung cancer in Hong Kong. It may present an even greater risk in its waterborne form, as radon in drinking water can cause stomach or intestinal cancer and possibly leukaemia. One independent study found that the highest level of waterborne radon was in mineral and tap water. A treatment plant at Sha Tin is deployed to monitor the radiation levels of Chinese water, as the most important sources of tap water are the Dong Jiang River in China and rain water stored in reservoir. The Government is now examining the effects of waterborne radon by conducting experiments on radon levels in water samples taken from various parts of the Territory. (SCMP 2nd March 1995)

**THE ENVIRONMENT PROTECTION DEPARTMENT** and experts from the US teamed up to study layers of Hong Kong's air borne pollution during October and December 1994. The aims of the study are to look at pollution generated within the

Hong Kong region, compared to that which comes from other regions, and to consider the impact of air pressure and temperature on air pollution. Once the analysed results of the study are available, a 3 dimensional map of pollutants can be produced which will help to formulate pollution control policies. Data gathered from ground based stations and other air quality data can be compared, which will give a clearer picture of the overall air pollution situation. (SCMP 12th February 1995)

**THE OCEAN PARK**

Corporation will invest \$700 million over the next four years to upgrade the existing aquariums and to build a new dolphin breeding pool with an underwater viewing gallery, an information centre for a dolphin conservation programme, a 200-seat simulation theatre and a roller coaster ride on the headland. (SCMP 12th February 1995)

**PROPOSED ADDITION** of 224 flights at Kai Tak airport has stirred confrontation between the residents living under the flight path and the Government. The residents accused the Government of sacrificing their health. One Eastern District Board member suggested that the residents should receive a compensation package, such as rate a waiver and sound proofing installation. But the Government argued the additional flights would boost the economy and rejected the argument for compensation. (SCMP 1st January 1995)

**THE TRANSPORT DEPARTMENT**

has proposed a plan which will ban drivers from heading towards the Cross Harbour Tunnel from turning left at Queen's Road East on to the Happy Valley flyover at the junction with Wong Nai Chung Road. The plans aims to ease congestion in Wan Chai on Queen's Road's eastbound lane.

The Department said that its study showed that only 18 per cent of vehicles travelling on Queen's Road East was cross-harbour traffic. However, critics say that the plan will not solve congestion, but rather will simply shift the problem to Happy Valley and Wong Nai Chung Road. (SCMP 5th March 1995)

#### PLANNING AND LAND USE

**UNDER THE REDEVELOPMENT PLAN FOR VICTORIA PARK**, a 400 metre long fibre glass-covered avenue will be built from Great George Street in the west to Hing Fat Street in the east. An enhanced swimming pool is also proposed. But the plan will cause a loss of 1341 squares metres of the Park's total area of 17 hectares. A spokesman for Friends of Earth said the loss of trees was unacceptable, as green areas are already scarce in Hong Kong. Nevertheless, Architectural Services Department project architect said the 'new park' would feature extensive trellis work, designed to lift the greenery vertically to compensate for the losses. (12th February 1995)

**A MAJOR DEVELOPER** has sought a judicial review of the decision of the Town Planning Appeal Board Chairman Justice Litton to sit on the Board hearing an application to develop low-density housing at Fung Lok Wai near Mai Po marshes. The developer fears a possible conflict of interest between the appointment of Justice Litton as Town Planning Appeal Board Chairman and his former Chairmanship of Friends of The Earth. But a Friend of Earth spokesman said that Justice Litton resigned from Friends of The Earth to avoid any perceived conflict of interest, and that it was impossible to find anyone on the Appeal Board without some

other (potentially conflicting) interest somewhere. (SCMP 5th February 1995)

## "PADS" UPDATE

**SAFETY REGULATIONS ON BUILDING SITES** are being tightened by the Government following a spate of tragic industrial accidents. New guidelines have been drawn up to stop unqualified workers from operating cranes on construction projects after the death of four people last year. Under the new amendment to the Factories and Industrial Undertakings Regulations, crane operators will have to hold a licence for operating cranes. (Immigrant labourers working on the new airport at Chek Lap Kok and associated projects will be briefed this month on their rights and obligations under the Employment Ordinance.) Site managers and construction companies allowing unlicensed workers to operate cranes will be fined up to \$50,000. (EE 2 January 1995)

**GREEN LANTAU ASSOCIATION** is asking for artificial mountains being built as noise barriers between Discovery Bay and new container terminals to be twice as high. The two 25-metre high sound barriers are intended to prevent noise from the port development of terminals 10 and 11 disturbing Discovery Bay residents. The environmental group claims the barriers are barely high enough to muffle the sound and cannot stop glare at night. (SCMP 3 January 1995)

**A \$2 BILLION RIVER TRADE CONTAINER TERMINAL** in Tuen Mun will be open for tenders by June this year as part of the Government's port and airport development strategy. The terminal is designed to cater for the massive increase in container trade to and from the Pearl River Delta.

It will occupy 56 hectares of reclaimed sea bed. (SCMP 23 January 1995)

## THE PROVISIONAL AIRPORT AUTHORITY

(PAA) awarded two contracts worth a total of \$11.98 billion yesterday, including one for the construction of the Chek Lap Kok Airport passenger terminal. The \$10.1 billion contract for the 1.2 kilometre long and 490,000 square metre terminal, one of the project's biggest components, went to a consortium of Chinese, Japanese, British and Hong Kong firms. (HKS 29 January 1995)

## TWO THAI WORKERS WERE KILLED

and four seriously injured when a flyover collapsed in a Route Three High-way construction site in Kwai Chung yesterday. The accident happened when a huge concrete segment of the flyover was being lifted from a working platform. The concrete slab, which weighed about 75 tonnes and was 10 metres long, suddenly fell from its crane harness and crashed to the ground, bringing down part of the bridge. (EE 25 February 1995)

## THE GOVERNMENT

announced yesterday that it will begin preparations for the second Tsing Yi South Bridge to be built separately from the stalled container terminal nine. The finance committee of the Legislative Council will soon be approached to approve more than \$1bn in funding for the project. (EE 2 March 1995)

## WORK ON THE \$7.14 BILLION TSING MA BRIDGE

reaches an important milestone this week when the contractors, Anglo-Japanese Construction (AJC), complete aerial spinning of the two main suspension cables. The bridge carrying both road and rail traffic, is part of the fixed crossing between Lantau Island

and Tsing Yi. The 2.2 kilometres long cables are being formed using 33,400 strands of galvanised wire, equivalent to 160,000 kilometres and enough to circle the Earth four times. When aerial spinning is completed, the wire will be compacted, wrapped and painted to create the 1.1 metre diameter cables. (SCMP 13 March 1995)

**GREEN GROUPS AND DISCOVERY BAY RESIDENTS** protested against the Lantau Port development yesterday as the Executive Council met to discuss the massive infrastructure project. The Advisory Council on the Environment endorsed the port project with stringent conditions but conservationists are concerned the conditions will not be enforced. A spokeswoman for Friends of the Earth, Lisa Hopkinson, said the impact of the port had not been adequately assessed. Apart from the threat posed to marine life by the construction of the port, freight traffic and decreased air quality would also affect the north-west New Territories, she said. (EE 29 March 1995)

## CASELAW UPDATE

Cambridge Water Company v. Eastern Countries Leather [1994] 2 WLR S3 (HC)

Rylands v. Fletcher cause of action - Review of origins of R v. F - re-assessment of the applicability of R v. F cause of action - instance of private nuisance, not a separate tort - reasonable foreseeability of damage a necessary element of R v. F - mere creation of employment does not make activity a "natural user".

The plaintiff carried on business as a supplier of water to consumers in the Cambridge

area. It sourced its water supply from under-ground reserves which it tapped by means of bore-holes. The plaintiff discovered that one of its bore-holes had become contaminated (with PCE's) beyond the maximum level set by the EEC.

Expert evidence (accepted by the trial judge) traced the source of contamination to the defendant's use of a solvent in the course of conducting its tannery business at premises nearby. Evidence indicated that many years earlier the defendant had allowed spillages of the solvent onto open ground from where it leached into the water acquirer, eventually reaching the plaintiff's water reserves.

The plaintiff sued in negligence and nuisance and succeeded in nuisance in the Court of Appeal. The House of Lords reversed the Court of Appeal decision. It considered that *Rylands v. Fletcher* was the appropriate cause of action (but dismissed that action on the facts).

In the course of this judgement, Lord Goff extensively reviewed the origins of the *Rylands v. Fletcher* action (being the decision of Justice Blackburn in *Rylands v Fletcher* (1866) L R 1 E X 265) and considered the modern-day application of the cause of action. In short summary, he concluded (inter alia):

- That over the years the courts have imposed various limitations on the scope of the action e.g. Justice Blackburn's decision went on appeal to the House of Lords where their Lordships created the "non-natural user" qualification and acts of God or strangers are a defence.
- "non-natural use" is to be treated as an expansive definition, and the mere fact that the activity in question has a beneficial effect (e.g.

the creation of local employment) for the community does not make it a "natural-use" for the purposes of *Rylands v Fletcher* (in this case, "the storage of substantial quantities of chemicals on industrial premises should be regarded as an almost classic case of non-natural use").

- "non-natural use" is a concept similar to "unreasonable use" in the tort of private nuisance.
- the rule enunciated in the *Wagon Mound No. 2* [1967] 1 AC. 617, that reasonable foreseeability of harm applies to the action of nuisance, should also be extended to a claim based on *Rylands v Fletcher*.
- in the area of environmental protection, legislation, rather than the common law (such as the *Rylands v Fletcher* action) is the more appropriate mechanism for imposing controls and liability (especially strict liability) on polluters.

## Commentary

Whilst this is not an immediately recent decision, it is included because of its importance to the question of persons or government agencies resorting to the common law in combatting Hong Kong's long-standing pollution - and the illegal activities of individuals causing it. It is, perhaps, surprising that there has been so little "private" litigation, whether based on *Rylands v Fletcher*, nuisance, trespass or negligence, in Hong Kong with respect to loss and damage caused by polluting activities (i.e. non-natural or unreasonable use of the polluters' land).

[For more detailed review of Cambridge Water Company see: Richard Glofcheski "Reasonable Foreseeability, Pollution, and

the Rule in Rylands v Fletcher” (1994) 24 HKLJ 189]

## REGIONAL AND INTERNATIONAL

The governments of the States, Territories and Commonwealth of Australia have long been criticised by the business community and public at large for their fragmented approach to environmental protection legislation.

In an effort to bring about a more uniform approach the governments entered into the Inter-governmental Agreement on the Environment (IGAE) in 1992, to which the Association representing Australian local governments was also a party.

The main purpose of the IGAE is the creation of the National Environment Protection Council (NEPC) for which State, Territories and Commonwealth legislation is at various stages of passage.

Members of the NEPC will be nominated governmental ministers from each of the 6 States and 2 Territories, with a minister nominated by the Prime Minister acting as chairperson. When established, the NEPC's main role will be to agree on environmental protection measures to be applied nationally. These will cover such matters as uniform air, water and soil quality and conservation objectives (inter alia). In the process of formulating these standards the NEPC is mandated to take into account (inter alia):

- regional environmental factors
- the likely social, economic and environmental impact of a proposed measure
- the perceived efficiency and ease of administering the proposed measure

It is to be hoped that the work of the NEPC will make more effective Australia's national framework of environmental protection measures. Historically, inter-State squabbling and Federal-State intransigence have, sadly, made it very difficult to achieve a nationally effective and unified approach to pressing environmental problems. The tragic devastation of the Murray-Darling river system is a classic case in point.

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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**Comparative Table of Environmental Convictions:  
January - March 1995**

	Number	1st Offence	2nd Offence	3rd + Offence	Highest Fine
APCO	17	7	3	7	\$ 10,000
	18	7	3	8	\$ 20,000
	18	9	4	5	\$ 20,000
WPCO	42	25	10	7	\$ 100,000
	11	8	3	-	\$ 50,000
	15	11	3	1	\$ 50,000
NCO	14	11	2	1	\$ 40,000
	4	3	1	0	\$ 20,000
	16	11	3	2	\$ 10,000
OLPO	-	-	-	-	-
	5	3	2	-	\$ 20,000
	2	2	-	-	\$ 50,000
DASO	-	-	-	-	-
	1	1	-	-	\$ 5,000
	-	-	-	-	-
WDO	1	1	-	-	\$ 5,000
	-	-	-	-	-
	-	-	-	-	-
WD(LW)R	-	-	-	-	-
	-	-	-	-	-
	1	1	-	-	\$ 10,000
Total	74	44	15	15	
	39	22	9	8	
	52	34	10	8	

**ABBREVIATIONS**

<b>AFD</b>	Agriculture & Fisheries Department
<b>APCO</b>	Air Pollution Control Ordinance
<b>CFCs</b>	Chlorofluorocarbons
<b>DASO</b>	Dumping At Sea Ordinance
<b>EC</b>	European Community
<b>EE</b>	Eastern Express
<b>EPCOM</b>	Environmental Pollution Advisory Committee
<b>EPD</b>	Environmental Protection Department
<b>EXCO</b>	Executive Council
<b>FEER</b>	Far Eastern Economic Review
<b>HKS</b>	Hong Kong Standard
<b>HKU</b>	University of Hong Kong
<b>JLG</b>	Joint Liaise Group
<b>LDC</b>	Land Development Corporation
<b>LEGCO</b>	Legislative Council
<b>LS</b>	Legal Supplement
<b>NCO</b>	Noise Control Ordinance
<b>NT</b>	New Territories
<b>OLPO</b>	Ozone Layer Pollution Ordinance
<b>PAA</b>	Provisional Airport Authority
<b>PADS</b>	Port and Airport Development Strategy
<b>SCMP</b>	South China Morning Post
<b>SMP</b>	Sunday Morning Post
<b>WDO</b>	Waste Disposal Ordinance
<b>WD(LW)R</b>	Waste Disposal (Livestock Waste) Regulations
<b>WPCO</b>	Water Pollution Control Ordinance

*September figures appear on the first line, October figures on the second, and November figures on the third of each item. Source: EPD, Anti-Pollution Prosecution Figures.*