

Bills Committee on Town Planning (Amendment) Bill 2003

**Summary of concerns/views raised by organizations
(as at 2 October 2003)**

Subject	Organization	Concern / view
Plan-making process		
<i>Exhibition of plans</i>		
<p>Proposal to standardize the plan exhibition period for submitting representations, by changing the period for raising objection to amendment to draft plans from three weeks to one month, and to new plans or amendments to approved plans from two months to one month</p> <p>Clauses 6 and 9(b)(i) Sections 5 and 7(2)</p>	<p>HKIA AAP APC HKIS REDA LSHK WWF HKIREA HYK KFBG CA Mr Edwin TSANG</p>	<p>Object the proposal. Suggest to retain the existing two-month exhibition period for new plans or amendments to approved plans to allow parties concerned sufficient time to make representations or raise objections.</p>
	<p>AAP</p>	<p>Appropriate measures should be taken to fast-track administrative procedures for handling representations or objections with a view to expediting the process.</p>

Subject	Organization	Concern / view
	LSHK	Suggest to put up more public notices about gazettal of plans and to give direct notification to the affected land owner in appropriate cases.
	Mr Ruy BARRETTO S.C.	Time reduction accepted only if quality of information and consultation process is significantly improved.
<i>Making of representations</i>		
<p>Proposal to accept both supportive and adverse representations relating to draft plans and amendments to draft plans</p> <p>Clauses 7 and 9 Sections 6 and 7</p>	<p>APC WWF CA</p>	<p>Support the proposal to enable Town Planning Board (TPB) to consider broader public views</p>
<p>Proposal to make available representations for public inspection and comments for three weeks after expiry of exhibition period</p> <p>Clauses 7 and 8 Sections 6 and 6A</p>	<p>HKIS APC</p>	<p>Consider the proposed time limit too short</p>
	<p>KFBG</p>	<p>Notices with a description of the plan or amendments should be prominently posted on or near the site and in the Gazette and the TPB web-site. Representations and comments received should be made available for public inspection until the planning process is completed.</p>

Subject	Organization	Concern / view
<p>Proposal to allow representers to furnish TPB with further information to supplement representations within four weeks upon expiry of the plan exhibition period</p> <p>Clause 8 Section 6B</p>	REDA	Consider the proposed period too short. Suggest to set the time limit at four weeks before the date of hearing by TPB.
	TPB	No explicit provision for allowing comment on further information and for representers to respond to comment before hearing. Reasonable time be allowed for representers and commenters to respond to each other.
	KFBG	Further information to supplement representations should be made available for public inspection until the planning process is completed.
<i>Consideration of representations</i>		
<p>Proposal to adopt a single hearing process to consider representations received by TPB</p> <p>Clause 8 Section 6D</p>	<p>HKIA HKIS APC HKIP REDA LSHK HYK LBAC CA</p>	<p>Object the proposal which will deprive affected parties from raising objection to amendments made by TPB to meet another objections</p>

Subject	Organization	Concern / view
	APC HKIA REDA LSHK	Suggest to retain the present preliminary consideration of objections by TPB in the absence of objectors and procedures for further objection to proposed amendments to draft plans to meet objections
	HKIP	Suggest to retain the preliminary consideration of objections by TPB
	REDA LSHK	Suggest to hear representations in public.
	KFBG	All the decisions made and representations or comments withdrawn should be accurately reflected in the minutes of TPB's meetings. Decision should be communicated to relevant parties. Minutes should be circulated for approval by all in attendance.
Proposal to reduce the processing time of objections by TPB from nine to six months, after expiry of plan exhibition period Clause 10 Section 8(2)	HKIS	Support the proposal on condition that the two-month exhibition period for draft plans or amendments to draft plans be retained
	HKIA REDA APC	Object the proposal as it would allow less time to prepare and make comments and to be heard by TPB

Subject	Organization	Concern / view
	AAP LSHK UW	Reduction of processing time should be achieved by streamlining existing administrative procedures and not at the expense of the time for making comments or hearing of representations.
	CEx	Query whether the proposal would enhance openness, transparency, independence and public participation.
	Mr Ruy BARRETTO S.C.	Time reduction accepted only if quality of information and consultation process is significantly improved.
<p>Proposal to reduce the extension period from six months to three months for considering representations by TPB that may be granted by the Chief Executive (CE)</p> <p>Clause 10(b)(vi) Section 8(2)</p>	WWF	Support the proposal as it will expedite the plan-making process
	REDA CA	Object the proposal as it would allow less time to prepare and make comments and to be heard by TPB
	KFBG	See no material advantage

Subject	Organization	Concern / view
<p>Proposal to confer CE with discretion to accept or discard proposed amendments by TPB</p> <p>Clause 11 Section 9(1A)</p>	TPB	Consider it important for CE to take into account planning implications of partially accepting any of the proposed amendments by TPB
	CE _x APC	Concern on the rationale for the proposal and whether decisions made by CE in Council are subject to judicial review.
	LBAC	Concern that no time limit has been set for the CE in Council to consider draft plan or amendments of plans
<p>Proposal to empower CE instead of CE in Council to refer an approved plan to TPB for replacement or amendment</p> <p>Clause 12(a) Section 12(1A)</p>	WWF	Support the proposal
	CA	Concern that CE is given too much power and the proposal may weaken the independence and impartiality of TPB
	KFBG	Prior notice to the parties concerned and consultation should be made before the CE in Council exercises its power to revoke any new plan upon the request of TPB.

Subject	Organization	Concern / view
Planning approval process		
<p>Proposal to obtain the consent of or notify the land owner if the applicant for amendment of plan and planning permission is not the land owner of the application site</p> <p>Clauses 13 and 16 Sections 12A(3) and 16(2)(a)</p>	HKIP LBAC	Support the proposal
	HKIA	Support the proposal but acknowledge problem of multiple land ownership. Concern whether Government will notify landowners anyway and if so, notification will be duplicated.
	HYK	Support the proposal. Where the land is owned by tso/tong, consent of manager of tso/tong must be obtained. Suggest to include in application and notice information about the land and applicant's particulars. A mechanism should be in place to give land owners a right to appeal in the event that an application with long term planning effect has not been brought to their attention.
	CA	Support the proposal but concern that non-governmental organizations may lack resources in conducting land searches and identifying the relevant land owners

Subject	Organization	Concern / view
	APC REDA	Object the proposal. Problems identified include multiple ownership, absentee owners and deceased owners and the possibility of corruption. Adequate opportunities for public consultation have been provided under the Bill.
	HKIS	Object the proposal as it will be costly and time-consuming and TPO mainly deals with land use
	ANTOSO	Object the proposal due to problem of multiple ownership. Consider that posting notices near the site or publishing notices in newspapers is sufficient.
	WWF AAP	No need to obtain consent of land owners of the application site. Notification of land owners suffices.
	AAP	Need to clearly specify the meaning of "all reasonable steps" taken to notify land owners (sections 12A(5)(b)(ii) and 16(2B)(b)(ii))
	KFBG	Consider notification of land owners suffices. Propose that notice to the land owners must be accompanied by a description of the application and the plan together with an offer to make available any relevant surveys and reports upon request. Also need to specify "all reasonable steps" have been taken to notify the land owners and what constitutes "all reasonable steps".

Subject	Organization	Concern / view
	LSHK	Suggest to give notice by TPB where the applicant other than the land owner applies for amendment
	LSHK REDA APC ANTOSO	All procedures in clause 13 should apply to applications by Government.
	Mr Ruy BARRETTO S.C.	Suggest to give advance notice to all persons who are obviously likely to be affected by development permission before formal application is lodged; to issue immediate direct notice after the application is made; to specify impact of the application; and to make available relevant supporting documents upon request.
Proposal to make available applications for amendment of plans for public inspection and comments Clause 13 Section 12A(6) to (11)	CA Mr Edwin TSANG	Support the proposal
	REDA LSHK	Proposed provisions should apply to amendments proposed by TPB which will have significant negative impact on private land ownership.
	HKIREA	Suggest to require public notice procedures only on proposed uses which may be offensive and affect neighbours

Subject	Organization	Concern / view
	KFBG	Representations and comments received should be made available for public inspection until the planning process is completed.
<p>Proposal to allow applicants to attend TPB meetings and be heard at the meetings</p> <p>Clause 13 Section 12A(16)</p>	HKIA WWF	Support the proposal
	HKIP KFBG Mr Ruy BARRETTO S.C.	Suggest to allow members of the public who have submitted comments other than the applicants to present view to TPB
	REDA LSHK	Applicants should be allowed to present applications for planning permission to TPB (section 16(3))
	HKIP	Landowners whose properties are within the boundary of development proposals should be allowed to be heard by TPB.
<p>Proposal to allow provision of further information relating to applications for amendment of plans and planning permission</p> <p>Clauses 13 and 16 Sections 12A(12),(13), 16(2I) and (2J)</p>	APC REDA LSHK ANTOSO	Concern about delay caused by new restrictions on provision of further information as the application shall be regarded as received when the further information is received.

Subject	Organization	Concern / view
	KFBG	Consider late addition of information unacceptable if it avoids timely public consultation. Any material changes should lead to the withdrawal of the application and the submission of a new application. Same comments apply to amendments to permissions in respect of plans (section 16A) and review applications (section 17).
<p>Proposal to make available applications for planning permission for public inspection and comments</p> <p>Clause 16 Section 16(2C) and (2F)</p>	<p>HKIP WWF HKIA APC CA Mr Edwin TSANG</p>	Support the proposal
	<p>WWF KFBG</p>	Suggest to upload all applications for planning permission and amendments of plans on the web-site of TPB for public inspection
	<p>KFBG Mr Ruy BARRETTO S.C.</p>	Suggest to make available previous applications, representations and decisions in respect of the same site for public inspection.
	Mr Ruy BARRETTO S.C.	All relevant information should be available for inspection until the whole process is completed
	<p>HKIA HKIS</p>	Support the proposal but concern about possible delay and uncertainty to development

Subject	Organization	Concern / view
	REDA LSHK	Only contentious applications for planning permission should be publicly notified for comments. TPB should specify classes of uses which would and would not require public notification.
	HKIREA	Suggest to require public notice procedures only on proposed uses which may be offensive and affect neighbours
	ANTOSO	Concern about the extent of information to be disclosed, in particular about commercially sensitive information. Proposal may generate unjustified objections from competitors and provide a loophole for corruption. Doubt whether consent of the applicants will be sought before disclosure of information.
Proposal to exempt certain minor amendments to planning permission from application Clause 17 Section 16A	HKIA	Support the proposal but a clear definition of minor amendments is required. Practice Notes may be issued in this regard
	WWF	Have reservation on the proposal unless it can be shown that the proposed exemption will not compromise the right of the public to make comments on planning applications

Subject	Organization	Concern / view
	KFBG Mr Ruy BARRETTO S.C.	All proposed minor amendments to planning permission should be subject to notice, consultation, comment and hearing.
	APC REDA	The clause is badly worded. The proposal may be more complex and time-consuming than the existing arrangement
	REDA	<p>The right to apply for minor amendments should be applied to anyone as approval runs with the land and not the owner (section 16A(2))</p> <p>Further information should be permitted at any time without delaying the consideration of the application (section 16A(6))</p> <p>Applicant should have a right to review even if the application is approved as TPB may impose new conditions (section 16A (10))</p> <p>Commenters should be notified of any changes (section 16A (10)).</p>
Review of applications		
<p>Proposal to make available applications of review for public inspection and comments</p> <p>Clause 18 Section 17(2C) and (2D)</p>	<p>APC HKIS REDA LSHK</p>	<p>Object the proposal as the proposed section 16 has provided opportunity for public comment on applications for planning permission</p>

Subject	Organization	Concern / view
	REDA	<p>Consider section 17(2H)(c) prevent submission of further information without delaying consideration of review</p> <p>Suggest to allow submission of additional information up to four weeks before hearing by TPB</p>
	HKIS	<p>Suggest to set up independent review board to consider review applications to avoid possible conflict of interests</p>
	KFBG	<p>Suggest that both the applicants and representers should have equal right of hearing by TPB and appeal to the Town Planning Appeal Board</p>
	APC KFBG Mr Ruy BARRETTO S.C.	<p>Suggest to open TPB meetings for considering review applications to the public</p>
	Mr Ruy BARRETTO S.C.	<p>To prevent abuse of process, an applicant should be prohibited from pursuing two similar applications at the same time</p>

Subject	Organization	Concern / view
Operation of TPB		
<p>Proposal to allow TPB to transact any of its business by circulation of papers</p> <p>Clause 5 Section 2B</p>	<p>HKIS HYK Mr Edwin TSANG</p>	<p>Object the proposal since issues relating to town planning and land uses have impact on welfare of people and should be fully deliberated at TPB meetings</p>
	<p>KFBG</p>	<p>Support the proposal</p>
<p>Proposal to allow TPB to delegate to its committees powers and functions relating to consideration of applications for amendment of plan, amendment to planning permission and review applications under section 17 of the Town Planning Ordinance (TPO)</p> <p>Clauses 3 and 4 Sections 2(5)(a) and 2A</p>	<p>HKIA AAP WWF</p>	<p>Support the proposal but stress on the need for a reasonable size and representation of committees.</p>
	<p>WWF</p>	<p>Suggest to establish a "Conservation Land Use Committee" to consider applications and matters relating to land use conflict between conservation and development</p>
	<p>HKIS</p>	<p>Object the proposal, in particular in relation to consideration of representations and review applications under section 17</p>

Subject	Organization	Concern / view
	KFBG	Object the proposal, in particular in relation to amendment of plans (section 12A) and amendments to permissions (section 16A).
	APC REDA LSHK Mr Ruy BARRETTO S.C.	Object that committees have delegated authority to consider review applications under section 17, which should be considered by the full TPB
	HKIA	Committee members must attend meetings to reach a decision. Written decision of absented members should not be accepted.
Proposal to allow TPB to delegate its power to a public officer to determine acceptance of further information in relation to applications for amendment of plan, planning permission, amendment to planning permission and review applications under section 17 of TPO Clause 3 Section 2(5)(b)	HKIA	Support the proposal but need to issue Practice Notes or guidelines on acceptance of further information and provision of appeal against decision of public officers.
	HKIS WWF KFBG Mr Ruy BARRETTO S.C.	Object the proposal as it may give rise to conflict of interest and violate the principle of openness. Public officers should not have power to permit minor amendments.

Subject	Organization	Concern / view
Enforcement control against unauthorized developments not permitted under TPO		
<p>Proposal to confine terms requiring compliance under an enforcement notice to discontinuance of an unauthorized development</p> <p>Clause 20 Section 23</p>	<p>HKIA WWF KFBG</p>	<p>Support the proposal to stop possible abuse of the provisions under the existing law by submission of a planning application and instituting the associated review and appeal process to delay the prosecution proceedings.</p>
	<p>KFBG Mr Ruy BARRETTO S.C.</p>	<p>Suggest to include provisions to strengthen enforcement against unauthorized development on agricultural land.</p>
	<p>HKIREA</p>	<p>Support the proposal but suggest to allow temporary uses to meet local needs.</p>
	<p>HKIS</p>	<p>Support the proposal on condition that private rights are respected and wastage of investment is minimized.</p>
	<p>CA</p>	<p>Support the proposal but consider that it should be extended to cover statutory plans outside development permission area</p>

Subject	Organization	Concern / view
	HYK	Have reservation on the proposal. As applications may be approved, suggest to provide a grace period or impose fines to deal with unauthorized developments, pending decision of TPB on planning applications and to set performance pledge on the time taken to process applications for change of land use.
	ANTOSO	Proposal will drive open storage operators out of business. Suggest to provide a grace period for discontinuance of unauthorized developments
<p>Proposal to allow the Planning Authority to enter private land other than domestic premises to ascertain whether there are matters constituting unauthorized developments, and to serve notice to obtain information, with failure to comply with the notice constituting an offence</p> <p>Clause 19 Section 22</p>	HKIA HKIS	Support the proposal
	KFBG	Support the proposal but suggest to require landowners to install and maintain some monitoring devices for evidence collection and to ensure compliance

Subject	Organization	Concern / view
<p>Proposal to allow the prosecution not necessary to prove certain matters in relation to offences concerning unauthorized developments</p> <p>Clause 20 Section 23(9A)</p>	HYK	Strongly object the proposal as it violates the principle of fairness
<p>Proposal to expressly provide that managers of a clan, family or t'ong shall be regarded as land owners to be liable to offences in relation to unauthorized developments</p> <p>Clause 2(a) Section 1A</p>	HKIA WWF	Support the proposal
	HKIS	Concern that managers may be different persons at different times
	HYK	Strongly object the proposal. Reasons given included managers of a clan, family or t'ong only act as agents and do not have full control over use of the land; the existing law provided adequate sanction against non-compliance with land use; the relevant case law is unclear; and many managers may resign because of the proposal which may result in confusion.

Subject	Organization	Concern / view
Recovering costs for processing planning applications		
<p>Proposal to enable the Secretary for Housing, Planning and Lands to prescribe fees by regulation to recover the costs for processing applications for amendment of plan, planning permission and amendment of planning permission</p> <p>Clause 14(c) Section 14(2)</p>	<p>HKIA REDA LSHK</p>	<p>Support the proposal in principle but concern about the level of fees</p>
	<p>WWF HYK</p>	<p>Need to justify cost recovery principle. Fees should be reasonable and accepted by the public.</p>
	<p>HKIS</p>	<p>Concern about additional cost to development proposal which may discourage investment by small developers</p> <p>Suggest to fix fees at different rates depending on scale and complexity of applications</p>
	<p>HKIA KFBG CA</p>	<p>Suggest to exempt non-profit-making or charitable organizations from payment of fees and where the proposed land use is for public benefit. HKIA should be consulted on details of fees.</p>
	<p>ANTOSO</p>	<p>Suggest to exempt open storage operators from payment of fees as they run small businesses and planning permission is often for a short period of time.</p>

Subject	Organization	Concern / view
	REDA	Query why Government departments should be exempted from payment of fees (section 14(5)).
Others		
Statutory effect of draft plans	TPB	Developer could proceed immediately with a development provided that it conforms to the zoning of the site, thus pre-empting decision of TPB and Chief Executive in Council on objections.
Scope of application of the Bill	REDA LSHK CE _x	Planning procedures should be equally binding on the Government and the private sector.
Stages of amendments to TPO	CE _x APC REDA HKIA HKIS AAP HKIREA KFBG LSHK	Suggest that fundamental issues such as independent and transparent operation and composition of TPB should be dealt with first.
	HYK	Compensation issue which has been outstanding for many years is not covered by the Bill.
	HKIS	Compensation for planning blight is not addressed by the Bill.

Subject	Organization	Concern / view
	HKIP	Suggest to include designation of Special Design Area (SDA) in Stage One amendments and Stage Three amendments in Stage Two to expedite the amendment process
	WWF	Suggest to deal with issues relating to SDA, Environmentally Sensitive Areas (ESA) and Designated Development in the Stage Two amendments
	CA	Suggest to urgently create ESA and SDA
Relationship between TPB and Government	HKIA APC AAP UW	TPB should have an independent secretariat.
	HKIA APC AAP REDA LSHK CE _x KFBG	TPB should be independent from Government.
	APC	TPB should be provided with independent legal advice and not by the Department of Justice. Suggest to set up a Planning Council to assist the CE in dealing with town planning issues at a macro level.

Subject	Organization	Concern / view
	UW	TPB should be able to employ independent consultants to study planning issues.
Composition of TPB	REDA LSHK HKIA APC CEx ANTOSO	Chairman of TPB and its subcommittees should be non-official members. Vice-Chairman of TPB should also be non-official member.
	CA	Composition of TPB should be well-balanced to represent interests of the entire community. Members of green groups should be included. Information on TPB members should be made known to the public.
Function and jurisdiction of TPB	CEx	Suggest that planning on infrastructural developments such as roads and railways should come under TPB's jurisdiction
	HKIS	TPB's role in strategic planning, especially in road and railway planning should be examined.
	KFBG Mr Ruy BARRETTO S.C..	Suggest to expressly provide that the conservation of the cultural and natural heritage of Hong Kong as one of the functions of the TPB
TPB meetings and related matters	HKIP CA	Suggest to open up all TPB meetings for public attendance

Subject	Organization	Concern / view
	HYK	Suggest to increase the quorum for TPB meetings and disclose how TPB members vote on individuals applications
	KFBG	Suggest to review the existing practice of TPB Secretariat particularly in relation to matters including accuracy of minutes, responsiveness to queries from the public, policy or guidelines for handling conflict of interests at meetings, documentation on applications and planning issues, etc
Improvement in planning process	HKIA	Suggest that the overall planning team should be led by planning professional and supported by other professionals including but not limited to urban designers, architects, traffic engineers and environmentalists.
	KFBG	Suggest that environmental non-governmental organizations or conservation bodies should be consulted at the same stage as other expert groups on plan-making and applications.
	REDA LSHK HKIP	Consultation by Government on planning studies cannot be a substitute for public consultation by TPB on proposals which have statutory effect.
	KFBG	Legislative amendment to mandate public consultation on planning studies is essential to ensure good planning decision.

Subject	Organization	Concern / view
	CA	Planning studies should be conducted for all levels of plans including Territorial Development Study, Regional Development Strategy, Outline Zoning Plan. Public consultation should be made and reports of studies available for public inspection.
	Mr Ruy BARRETTO S.C. KFBG	All relevant reports and evidence in support of plans and applications for development permission must be made available to the public on request throughout the plan-making process.
	Mr Ruy BARRETTO S.C.	<p>A proper notification system should be established to ensure that the public and those affected have the right to information on plans and amendments, to make representations and to be heard by TPB.</p> <p>International conservation principles should be adopted in the town planning process.</p> <p>Applicant for re-zoning or development should be required to make appropriate restoration to the land concerned where environmental or ecological damage has been caused before such an application can be processed.</p>

Subject	Organization	Concern / view
	ANTOSO	<p>Existing guidelines on town planning issued by TPB should be made known to the public to facilitate compliance. Suggest that the Administration should clarify the applicability of relevant guidelines, particularly the one on "Application for Open Storage and Port Back-up Uses" (TPB PG-No.13C), to the stakeholders concerned where appropriate.</p> <p>Late provision of supplementary information in support of applications should be allowed</p>
	Mr Edwin TSANG	<p>Suggest to establish a system for submission of plans or amendments by professionals to ensure quality planning. Reference can be made to the existing provisions in the Buildings Ordinance (Cap.123) whereby an authorized person is statutorily required to co-ordinate matters in relation to submission of building plans.</p>

Council Business Division 1
Legislative Council Secretariat
9 October 2003

Submissions from organizations

Organization	Reference
The Association of Architectural Practices Ltd. (AAP)	LC Paper No. CB(1)2390/02-03(02)
The Association of Planning Consultants of Hong Kong (APC)	LC Paper No. CB(1)2390/02-03(03) LC Paper No. CB(1) 2512/02-03(03)
The Hong Kong Institute of Architects (HKIA)	LC Paper No. CB(1)2390/02-03(04)
The Hong Kong Institute of Planners (HKIP)	LC Paper No. CB(1)2390/02-03(05)
The Hong Kong Institute of Surveyors (HKIS)	LC Paper No. CB(1)2390/02-03(06)
The Law Society of Hong Kong (LSHK)	LC Paper No. CB(1)2390/02-03(07)
The Real Estate Developers Association of Hong Kong (REDA)	LC Paper No. CB(1)2390/02-03(08)
Urban Watch (UW)	LC Paper No. CB(1)2390/02-03(09)
World Wide Fund for Nature Hong Kong (WWF)	LC Paper No. CB(1)2390/02-03(10)
Heung Yee Kuk (HYK)	LC Paper No. CB(1)2390/02-03(11) - Extract from minutes of the meeting between Legislative Council Members and Councillors of Heung Yee Kuk on 10 June 2003; LC Paper No. CB(1) 2484/02-03(01) LC Paper No. CB(1) 2512/02-03(05)
Hong Kong Institute of Real Estate Administration (HKIREA)	LC Paper No. CB(1) 2451/02-03(03)

Organization	Reference
Town Planning Board (TPB)	LC Paper No. CB(1) 2451/02-03(04)
Civic Exchange (CEX)	LC Paper No. CB(1) 2481/02-03(01)
Land and Building Advisory Committee (LBAC)	LC Paper No. CB(1) 2494/02-03(03) LC Paper No. CB(1) 2494/02-03(04)
The Association of the New Territories Open Storage Operators Ltd (ANTOSO)	LC Paper No. CB(1) 2483/02-03(01) LC Paper No. CB(1) 2512/02-03(04)
Kadoorie Farm & Botanic Garden (KFBG)	LC Paper No. CB(1) 2494/02-03(01)
The Conservancy Association (CA)	LC Paper No. CB(1) 2512/02-03(02)
Mr Edwin TSANG	LC Paper No. CB(1) 2483/02-03(02) LC Paper No. CB(1) 2494/02-03(02)
Mr Ruy BARRETTO S.C.	LC Paper No. CB(1) 2512/02-03(01)