February 1985

COMMONWEALTH ASSOCIATION OF LEGISLATIVE COUNSEL

Newsletter No. 4

Dear Member,

There is not really adequate material for a further newsletter but I am sending out this newsletter primarily for the purpose of furnishing each member with a full list of members of the Association. If any member notices any errors in the list, I shall be grateful if he or she will draw them to my attention.

The President has informed me that an order has now been placed for ties and scarves and that the goods should be ready for delivery about mid-April.

I have been passing the time during our slack period by engaging in some controversial correspondence about several trivial matters peripheral to legislative drafting and I enclose copies for your amusement.

With best wishes,

Yours sincerely,

Geoff Kolts

(Geoff Kolts)
Secretary

THE LANGUAGE OF THE STATUTES

Members may find the following of some interest:

THE PARLIAMENTARY DRAFTSMAN

I'm the Parliamentary Draftsman,
I compose the country's laws,
And of half the litigation
I'm undoubtedly the cause.
I employ a kind of English
Which is hard to understand;
Though the purists do not like it,
All the lawyers think it's grand.

I'm the Parliamentary Draftsman,
And my sentences are long;
They are full of inconsistencies
Grammatically wrong.
I put Parliamentary wishes
Into language of my own
And though no one understands them
They're expected to be known.

I compose in a tradition
Which was founded in the past,
And I'm frankly rather puzzled
As to how it came to last.
But the Civil Service use it,
And they like it at the Bar,
For it helps to show the laity
What clever chaps they are.

I'm the Parliamentary Draftsman
And my meanings are not clear,
And though words are merely language
I have made them my career.
I admit my kind of English
Is inclined to be involved—
But I think it's even more so
When judicially solved.

I'm the Parliamentary Draftsman,
And they tell me it's a fact
That I often make a muddle
Of a simple little Act.
I'm a target for the critics,
And they take me in their stride—
Oh, how nice to be a critic
Of a job you've never tried!

(ANON)

Editorial - Sydney Morning Herald 1/1/85

A quasi-call to ditch legalese

I'm the Parliamentary Draftsman,
I compose the country's laws.
And of half the litigation
I'm undoubtedly the cause.
J.P.C., Poetic Justice.

IF THE Senate Standing Committee on Education and the Arts has its way, the days of the parliamentary draftsman may be numbered. The committee has recommended that a national task force be established to recommend on the reform of legal language. There are those who claim the legalese trouble began when Law French was dropped in favour of the vernacular. The change prompted one learned text-writer more than 150 years ago to complain: "Really the Law is scarcely expressible properly in English." Any move by the Federal Government to improve the intelligibility of legal English might have some serious consequences. Lawyers' earnings could dip to levels comparable to those of striking orthopaedic surgeons. A more serious consequence could be to render null and void some of the most entertaining passages in the case books, where generations of learned judges have struggled to make sense out of incomprehensible statutes.

Take, for example, the British Rent Acts, for many years the bane of British judges and once blamed for an increase in the judicial mortality rate. As MacKinnon L.J. said in 1946: "If the Judges now had anything to do with the language of the Acts they are to administer, it is inconceivable that they would have to face the horrors of the Rent and Mortgage Interest Restriction Acts — horrors that are hastening many of them to a premature grave." On another occasion MacKinnon L.J. was forced to consider the same acts and decided, with considerable misgivings, that he should allow the appeal from the county court: "Having once more groped my way about that chaos of verbal darkness, I have come to the conclusion, with all becoming diffidence, that the country court judge was wrong in this case. My diffidence is increased by finding that my brother Luxmoore has groped his way to the contrary conclusion."

A favourite target for Goddard L.J. was section 12 of the Agricultural Holdings Act, 1923, about which he once said: "For myself, I am not ashamed to admit that I have not the least idea what sub-section 8 means." Simplifying legal language would mean that judges would no longer be able to cast aspersions on draftsmen and legislatures, as Scrutton L.J. once did after struggling to come to terms with section 8 of the Workmen's Compensation Act, 1925: "If I am asked whether I have arrived at the meaning of the words which Parliament intended, I say frankly I have not the slightest idea." The fearless MacKinnon L.J., after reading section 4 of the Trade Marks Act, 1938, hundreds of times, confessed: "I have very little notion of what the section is intended to convey, and particularly the sentence of 253 words."

Simplifying legal language would also mean fewer acidic exchanges between the Bench and the Bar. In the late 18th Century, the Lord Chancellor Fitzgibbon complained to his old adversary, Curran, that the words he was seeking to differentiate, "also" and "likewise", were clearly synonymous. Curran replied: "No fanciful distinction, my Lord. My Lord, the great Lord Lifford for many years presided over this court. You *also* preside, but not *likewise*." The committee's recommendation for reform is to be quasi-welcomed.

7 January 1985

The Editor,
Sydney Morning Herald,
235 Jones Street,
ULTIMO N.S.W. 2007

Sir,

It is time that someone put to rest the fallacious notion that is being widely disseminated by many prominent but misguided people to the effect that the laws of this country can be expressed in language capable of being comprehended by the ordinary educated citizen.

I have been stimulated to write on this topic by your editorial of 1 January 1985 concerning certain recommendations of the Senate Standing Committee on Education and the Arts relating to the "Reform of Legal Language".

The editorial quotes the opening lines of a well-known piece of doggerel to the effect that the drafters of legislation are the cause of half the litigation. The editorial then proceeds to list some of the adverse comments that have been made from time to time in England with respect to the drafting of certain provisions of English statutes. The relevance of the quoted comments eludes me as the proposals for reform of legal language, in so far as they refer to statutes, would relate to Australian statutes and it would hardly be fair to judge the standard of legislative drafting in Australia by reference to legislative drafting in another country.

However, even if there are similar criticisms of Australian legislation to be found, it must be remembered that, although there are undoubtedly many examples of poor drafting scattered throughout the statutes, these are insignificant when compared with the millions of legislative provisions the form of which has never given rise to judicial or other criticism. The Parliamentary Counsel aim for, but do not expect to achieve, perfection and lapses of the kinds mentioned in the editorial merely show that the drafters are human.

As to the question of the complexity of the statutes, it is of course possible to draft simple laws to deal with simple subjects as, for example, a law to require motor vehicles to drive on the left hand side of public streets. However, it is arrant nonsense to suggest that complex concepts are always capable of being stated in simple terms. Thus a law requiring the ultimate beneficial owner of shares in a public company to be traced through a series of interposed companies, partnerships and trusts could hardly be expected to be simple and easily comprehended. To suggest otherwise is to live in wonderland.

It would have been fairer if the writer of your editorial had also quoted the last paragraph of the doggerel with which the editorial opened. It reads as follows:

"I'm a target for the critics,
And they take me in their stride -
Oh, how nice to be a critic
Of a job you've never tried."

Yours faithfully,

(G K Kolts)
First Parliamentary Counsel

NOTE: The "Herald" refused to publish the final paragraph of the above letter.

LEGAL WONDERLAND

Sir,

I was fascinated by the response of G.K. Kolts, First Parliamentary Counsel, Canberra (Herald, January 12) to your recent editorial on legal language.

G.K. Kolts well-illustrates that he/she is a victim of a most fundamental assumption: that legal language means words only. This curious view no doubt arises because G.K. Kolts doesn't know of the wonderland in which modern commerce and justice are conducted.

How do lawyers and accountants explain complex legal concepts and schemes to their clients (and for that matter, sundry taxation folk)?: they use diagrams and flow charts, perhaps even employing different colours! After all, it is the twentieth century.

G.K. Kolts's example of tracing beneficial ownership of shares is precisely an area where such graphic depiction is used. Need I say that use of even the humble microcomputer makes this task doubly easy. Unlike G.K. Kolts lawyers and accountants in private practice do have to make complex matters readily comprehensible to stay in business.

Mark McMahon,
Angel Place,
Sydney.

12 January

COMPLEX LAWS AND PLAIN ENGLISH

Sir

In his letter (Herald, January 12) Mr Kolts, first parliamentary counsel, has misrepresented the position of those who advocate the use of plain English in official documents and legislation. They argue for plain English because it offers a more effective mode of expression, allowing people to communicate with one another clearly and to absorb material efficiently.

It is not a simplified, reduced, childish version of English: a document in plain English is as full a statement on a subject as one in legalese or officialese.

This is not to claim that a plain English document on a complex subject will be easy to understand immediately without any previous knowledge of the subject. An advanced text on cancer or a law about the ownership of shares, such as Mr Kolts proposes as an example, will remain complex. But the complexity will reside solely in the subject matter, and not be compounded by difficulty in language. For it is an error to assume - as Mr Kolts seems to - that difficulty in content must be matched by difficulty in language. Above all complexity in matter does not call for complicated, convoluted language.

So many practices in the traditional way of writing laws and regulations can be shown to be faulty. There is, to mention just one example, the custom of packing all qualifications connected with a topic into the one sentence.

It is invalid and leads to those lengthy, tortous sentences which characterise so much legal writing. Aptly known as gobbledegook, these practices obscure content and meaning. They can be readily abandoned and replaced with more effective forms.

Indeed there are many advantages in changing. Citizens have a right to understand the laws and regulations that apply to them. We put democracy at risk whenever we cloud the policies of government.

Again plain language highlights those areas in a document where the policy is complicated or unfair and thus encourages a review. One of the troubles with gobbledegook is that it tends to conceal weaknesses in underlying policy.

As a number of organisations in Australia have already demonstrated, complex documents can be written in plain, clear English without any loss of legal precision. Gobbledegook is not essential. As a burden on both writer and reader it cannot be justified. To defend and want to preserve it shows a mis-understanding of language.

Robert D. Eagleson,
Consultant to the Australian Government on Plain English,
Department of English,
University of Sydney.

January 18

12 February 1985

Professor R D Eagleson,
Department of English,
University of Sydney,
BROADWAY N.S.W. 2007

Dear Professor Eagleson,

Since the Sydney Morning Herald appears to be unwilling to publish my reply to your letter of 24 January, I am writing to you direct to make it clear that I do not accept without qualification some of the statements in your letter.

It seems to me that you are adopting two contradictory positions. On the one hand, you state that you accept my argument that the average educated citizen cannot expect to be able to understand without difficulty laws dealing with complex subjects. You agree that such a law can be understood only by a person with expertise in the subject concerned. On the other hand, you claim that citizens have the right to understand the laws that apply to them. The contradiction is that this claim is clearly inapplicable in the case of a law dealing with a complex subject.

You also mar your apparent acceptance of my argument in relation to laws dealing with complex subjects by going further and misrepresenting me. The implication of your letter is that I was saying that complexity in the subject matter of a law called for complicated and convoluted language. I said no such thing. Nor was I defending gobbledegook. Indeed I am a strong supporter of the use of plain language and I acknowledge that there is all the difference in the world between good and bad drafting.

In view of your apparent confusion as to my position, I repeat my main point that it is naive to believe, and simply not true, that laws dealing with complex matter can always be written so as to be easily comprehended... Frankly, most critics of legislative drafting standards have no idea of what is involved in legislative drafting. The drafter begins with pages of intricate instructions, voluble instructors bubbling over with ideas that are continually being changed as a result of cross-examination by the drafter, continual alterations in Government policy and an impossible deadline to finish the job. If we had six months in which to revise and polish a job that had in fact to be completed in three weeks, no doubt the wishes of the "plain words" advocates could be met. But the real world is just not like that.

Turning from practice to theory, the reason that even a well-drafted law may be difficult to understand (even to an expect in the subject matter of the law) is that the law has to be unambiguous. The drafter is not likely to receive any thanks from the Government for drafting a law that is easily comprehensible but imprecise. As Sir Ernest Gowers has pointed out in "The Complete Plain Words", lack of ambiguity does not go hand in hand with intelligibility, and the further you get to the former the further you are likely to get from the latter. In the case of a law dealing with complex matters, there is substantial truth in the proposition enunciated by a former English Parliamentary Counsel* that the intelligibility of such a law is in inverse proportion to its chance of being right.

Yours sincerely,

(G K Kolts)
First Parliamentary Counsel

* John Rowlatt, quoted by H.S. Kent in "In on the Act", Macmillan, 1979, at page 97.

One Thing and Another . . .

by DAVID SWAIN

Guidelines

A chairman once I
used to be
till feminism
claimed to see
injustice in the
very name.
Chairperson, right? (The
job's the same).
But "person" ends with
sexist "son",
so feminism
just for fun
set further guidelines.
Now, beguiled,
I have become a
chairperchild.

29 January 1985

Dr P Wilenski,
Chairman,
Public Service Board,
Canberra.

Dear Peter,

I have noticed in the recent Bulletin issued by the Public Service Board (No. 61, January 1985) the following passage -

> "The implication of this case is that, where a person is unhappy with a decision and there is a right of internal appeal against the decision on the merits, the person should first of all exercise their right of internal appeal."

I very much regret that the Board should have chosen to lend its support to the solecism underlined in the above-mentioned passage. If the Board wishes to avoid so-called "sexist" language, why could not the Bulletin have simply said 'the person should first of all exercise the person's [or 'his or her'] right etc". These latter options were recently approved by the Legislation Committee for use in legislation and the Committee expressly rejected as ungrammatical and unacceptable the use of the singular noun and the plural pronoun.

For myself, I prefer to write in English [even the stilted English forced on me by the Government] rather than use femlibspeak.

Yours sincerely,

(G K Kolts)
First Parliamentary Counsel

Public Service Board

McLachlan Offices National Circuit Canberra A.C.T. 2600 Tel 72 3977

OFFICE OF
THE CHAIRMAN

5 February 1985

Mr G.K. Kolts
First Parliamentary Counsel
Robert Garran Offices
Kings Avenue
CANBERRA ACT 2600

Dear Geoff

Thank you for your letter of 29 January. I do not think that the passage referred to was either "femlibspeak" or an attempt to avoid sexist language but probably a simple grammatical error. I have drawn it to the attention of the guilty party.

While English is not my mother tongue and I hesitate to venture an opinion, I think that it goes rather far to suggest that the passage is not English. Indeed, you may be aware that there is even some debate whether it is a grammatical error. My copy of the Shorter Oxford English Dictionary cites as the second meaning of "they" - "often used in reference to a singular noun made universal by every, any, no, etc, or applicable to either sex (= 'he or she')" and cites the first use in this way as being in 1526. There is furthermore, strong precedent for this use by a number of major English prose writers and I attach a selection to this letter.

Fowler is also somewhat equivocal in his comments on this usage. As thou knowest, "you" only gradually became universal for both the singular and plural and perhaps "they" and "their" are slowly moving in the same direction.

However that may be, I am happy to concede that this was a grammatical error in the normal way we use "they" and "their" in the Australian Public Service. I do not think, however, that the solution is to substitute "his or her". It would be far more simple to substitute some other word, such as "any" or to slightly rewrite the last clause, e.g. "such right should first be exercised".

I do not think there is any real difficulty in ordinary spoken or written communication in using grammatical language which is neither sexist nor cumbersome. I hope the Board's future efforts will demonstrate that.

Yours sincerely

Peter Wilenski

Peter Wilenski

To _____

Please ~~see~~ me

~~Remarks~~

"If a person is born of a .. gloomy temper .. they cannot help it" - Chesterfield

"A person can't help their birth" - Thackeray
"Nobody prevents you, do they?" - Thackeray

"Nobody in their senses" - Bagehot

"It's enough to drive anyone out of their senses" - G.B. Shaw

"I am never angry with anyone unless they deserve it" - Ruskin

"Every person ..... now recovered their liberty." - Oliver Goldsmith

"[H]e did not believe it rested anybody to lie with their head high ..." - Elizabeth Bowen

11 February 1985

Dr P Wilenski,
Chairman,
Public Service Board,
McLachlan Offices,
National Circuit,
ACT 2600.

Dear Peter,

Thank you for your interesting letter of 5 February 1985.

I am glad to learn that the Board is not pursuing a deliberate policy in the matter to which our correspondence relates and that you agree with me that we have to accept the current grammar of the English language until it is clear that a change has occurred.

The literary history of the use of singular nouns and plural pronouns is set out at what seems to me to be excessive length in the Report of the Victorian Parliamentary Committee on the Victorian Acts Interpretation Act, a report no doubt written by the Secretary to the Committee, Dr Scutt. The view espoused in that Report that singular nouns and plural pronouns were at one time correct grammar and should be accepted again is, I hope, a vain attempt to "call back yesterday, bid time return". Even if ultimately successful, it smacks of illogicality.

As to literary examples of the kinds mentioned in the attachment to your letter, I do not think we should be governed by the grammatical mistakes of others, whether eminent prose writers or not. Even Shakespeare occasionally fell into error, see for example his incorrect use of "whom" in The Tempest, Act III, scene iii, line 92.

I regret that I cannot share your view that there is no real difficulty in using grammatical language that is neither sexist nor cumbersome. Despite strenuous efforts, provisions drafted in such a way as to avoid sexist language have produced, on occasions, clumsy and inelegant sentences that are far removed from ordinary English usage.

I might mention in conclusion that the suggestion made in your letter for the use of "such" as a defining device ("such right") has, except in special circumstances, been frowned on

in Commonwealth legislative drafting. Private legal documents abound with "such" and "same", designed no doubt by the drafters of those documents to give a "legal sounding" flavour to what are otherwise pedestrian sentences. In most cases, "such" is an unnecessary substitute for "that".

Yours sincerely,

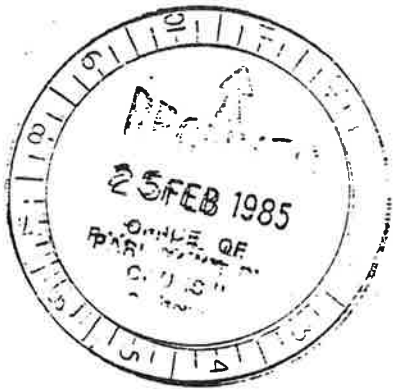
(G K Kolts)
First Parliamentary Counsel

Public Service Board

McLachlan Offices National Circuit Canberra A.C.T. 2600 Tel 72 3977

OFFICE OF
THE CHAIRMAN

18 February 1985



Mr G.K. Kolts
First Parliamentary Counsel
Robert Garran Offices
Kings Avenue
CANBERRA ACT 2600

Dear Geoff

Thank you for your letter of 11 February.

I had not had, at the time I wrote, the pleasure of reading Dr Scutt's report and was not aware that the issue had already been thoroughly canvassed in the parliamentary drafting area. It does seem to me, however, as a layman, that if those drafting legislation can swallow the strange and, to many people, offensive convention that "he" refers both to the male and the female, it should be fairly easy for them to declare that "their" embraces both the singular and the plural. However, I agree that we will try not to use it in Public Service Board circulars.

Thank you for your correction over the use of the word "such". It was perhaps my natural deference as the speaker of English as a second language which led me to accept the use of the word from the very culprit who was guilty of the original solecism. "That" is, of course, much better. It demonstrates that when we consciously try to avoid non-sexist language we can often devise constructions that are simpler and clearer in every respect.

Yours sincerely

Peter Wilenski

Peter Wilenski

Names and, where known, addresses of members of the Association

Mr Clare L Roberts,
Solicitor General,
Ministry of Legal Affairs,
Old Administration Building,
St John's,
ANTIGUA. W.I.

Mr G K Kolts, OBE, QC,
First Parliamentary Counsel.
Mr I M L Turnbull,
Ms S M Power
Mr J. Leahy
Ms A. Caine
Mr V. Robinson
Mr. G.C. Harders
Mr. T. Reid
Mr. S.J. Reynolds
Mr. J.R. Sarvaas
Mr. K.E. Jones

Office of Parliamentary Counsel,
Robert Garran Offices,
Kings Avenue,
Canberra, ACT 2600,
AUSTRALIA.

Mr J Q Ewens, CMG, CBE,
57 Franklin Street,
Forrest,
ACT 2603,
AUSTRALIA.

Mr E Wright,
First Assistant Secretary,
Commercial and Drafting Division,
Attorney-General's Department,
Canberra,
ACT 2600,
AUSTRALIA.

Mr D Murphy,
Parliamentary Counsel,
Parliamentary Counsel's Chambers,
Goodsell Building,
8-12 Chifley Square,
Sydney, NSW 2000,
AUSTRALIA.

Mr J A Dorling,
Ms Dawn Ray,
Mr M. Hawkins,
Mr G.A. Fox

Parliamentary Counsel's Office,
Department of the Chief Minister,
GPO Box 3144,
DARWIN. NT 5794

Ms Dorothy Kitching,
Legislative Draftsman,
The Administration of Norfolk Island,
Administration Offices,
KINGSTON NORFOLK ISLAND 2899

Mr L J Murray,
Parliamentary Counsel,
Executive Building,
100 George Street,
Brisbane,
Qld. 4000,
AUSTRALIA.

Mr G Hackett-Jones,
Parliamentary Counsel,
Mr J S Eyre

Office of Parliamentary Counsel
State Administration Centre,
Victoria Square,
Adelaide. SA 5000
AUSTRALIA

Miss J M Smith,
Chief Parliamentary Counsel
Mr B W Brown
Miss M G Bingham,
Mr G B Gibbs,
Ms J Smith,
Mr P R Conway,
Ms J McDonald

Office of Parliamentary Counsel,
AMP Building,
86 Collins Street,
Hobart. Tasmania 7000,
AUSTRALIA.

Mr D E Berry,
Parliamentary Counsel's Chambers,
Goodsell Building,
8-12 Chifley Square,
SYDNEY. NSW 2000
AUSTRALIA.

Ms R M Armstrong,
Chief Parliamentary Counsel,
Mr E P A Moran.

Parliamentary Counsel's Chambers,
221 Queen Street,
Melbourne,
Victoria 3000,
AUSTRALIA.

Mr J C Finemore, AO, OBE, QC,
15 Peverill Street
BALWYN Victoria 3103
AUSTRALIA

Mr G C Thornton, OBE,
Parliamentary Counsel,
Parliamentary Counsel's Office,
Crown Law Department,
Wales Centre,
109 St George's Terrace,
Perth. WA 6000,
AUSTRALIA.

Mr R M Berriman,
14 Tullaroop Street,
DUFFY ACT 2611
AUSTRALIA.

Mr C J Lynch
1 Nield Avenue,
BALGOWLAH, NSW 2093,
AUSTRALIA.

Mr S Mason,
Law Reform Commission,
GPO Box 3708,
SYDNEY NSW 2001

Mrs Anita Allen,
Principal Legal Draftsman,
Legal Department,
P O Box N-3007,
Nassau,
BAHAMAS.

Ms Yolande Bannister, QC,
Chief Parliamentary Counsel.
Mr E D Chase,
Mr J Ryan.

Ministry of Legal Affairs,
Marine House,
Hastings, Christ Church,
BARBADOS.

Mr G N Brown
Mr K K Poornananda

Attorney-General's Ministry,
Belmopan,
BELIZE. C.A.

Mr George H C Griffith,
Parliamentary Counsel,
Mr K H J Ireland
Mr F L A Waterman

Attorney-General's Chambers,
Hamilton,
BERMUDA.

Mr. J.H. Hobbs,
Legal Draftsman,
Attorney-General's Chambers,
Private Bag 009,
Gaborone,
BOTSWANA.

M Gérard Bertrand, QC,
Chief Legislative Counsel,
Department of Justice,
344 Wellington Street,
Ottawa, K1A 0H8
CANADA.

Mr H A McIntosh, QC,
Mr P Johnson, QC,
Mr M Pepper, QC,
Mr H B Shaffer, QC,
Mr N H Thurm,
Mr D Maurais,
Mr R Bergeron,
Mrs M Dawson, QC.
Mr. Rae H. Tallin, Q.C.,

Legislation Section,
Department of Justice,
344 Wellington Street,
Ottawa, K1A 0H8,
CANADA.

Professor D.E. Stolz,
Director, Legislative Drafting
Programme,
University of Ottawa,
57 Copernicus,
Ottawa Ontario, K1N 6N5
CANADA

Mr M. Beaupré,
Assistant Law Clerk and
Parliamentary Counsel,
Ms D.R. Davidson

P.O. Box 1034,
Wellington Building,
House of Commons,
Ottawa,
ONTARIO, K1A 0A6
CANADA.

M. M.R. Pelletier, c.r.
Légiste et conseiller parlementaire
Piéce 451-N, éd. du centre
Chambre des communes
OTTAWA ONTARIO K1A 0A6

Mr R. Du Plessis, Q.C.
Mr M. Audcent

Law Clerk and Parliamentary Counsel
The Senate of Canada
OTTAWA ONTARIO K1A 0A4

Mr. Peter J. Pagano,
Chief Legislative Counsel.
Ms R M Bradley

Department of the Attorney-General,
2nd Floor, 9833-109th Street,
Edmonton, Alberta, T5K 2E8
CANADA.

Mr. M. W. J. Clegg,
Parliamentary Counsel,
315 Legislative Building,
Edmonton, Alberta, T5K 2B6
CANADA

Mr. Allan R. Roger,
Legislative Counsel.
Mr H M Thornton,
Ms B J Thompson.

Parliament Buildings,
Victoria, B.C. V8V 1X4,
CANADA.

Mr I.D. Izard
Law Clerk,
Clerk Assistant of the Legislative
Assembly,
Parliament Buildings,
Victoria, BC V8V 1X4,
CANADA

Mr. Claude Pardons,
Legislative Counsel,
Office of the Attorney-General,
P.O. Box 6000,
Fredericton, New Brunswick, E3B 5H1,
CANADA

Mr. A John Noel,
Senior Legislative Counsel.
Mrs L Black,
Mr C Lake.

Office of the Legislative Counsel,
Confederation Building,
St. John's, Newfoundland, A1C 5T7,
CANADA

Mr. Graham D. Walker, QC,
Chief Legislative Counsel,
Mr A.G.H. Fordham

Howe Building, Ninth Floor
P.O. Box 1116
HALIFAX. NOVA SCOTIA B3J 2X1
CANADA

Mr. Arthur N. Stone, QC,
Senior Legislative Counsel,
Mr D. Revell
Ms C.Schuh

Ministry of the Attorney-General,
Box 1, Legislative Building,
Queen's Park,
Toronto, Ontario, M7A 1A2,
CANADA

Mr P D Beseau,
Baribault, Beseau, Campbell & McCuaig,
Barristers, Solicitors & Notaries,
PO Box 480,
165 Bay Street,
Embrun, Ontario, KOA 1WO
CANADA.

Mr. M. Raymond Moore,
Legislative Counsel,
P.O. Box 1628,
Charlottetown, P.E.I., C1A 7N3,
CANADA

M. Gilles Letourneau,
Directeur-general adjoint aux
affaires legislatives.
M. G Boisvert.

Ministere de la Justice,
122 Route de l'Eglise,
Sainte-Foy, Quebec, G1V 4M1,
CANADA

M. R. Geoffrion, c.r.
Greffier en loi de la Législature
Assemblée nationale du Québec
Service de la législation
1er étage, chambre 131
Hotel du Parlement
QUEBEC. QUEBEC G1A 1A4

Ms. Merrilee Charowsky,
Legislative Counsel & Law Clerk,
Room 105, Legislative Building,
Regina, Saskatchewan, S4S 9B3,
CANADA

Mr. Padraig O'Donoghue, QC,
Deputy Minister of Justice,
P.O. Box 2703,
Whitehorse, Yukon Territory,
Y1A 2C6 CANADA

Mr. S.K. Lal,
Deputy Minister
Miss Deborah Meldazy,
Chief of Legislation Division,

Department of Justice & Public
Services,
Government of the Northwest
Territories,
Yellowknife, NWT,
CANADA X1A 2L9

Mr M J Bradley,
Attorney-General
Mr J B Wilkinson
Legal Draftsman

Attorney-General's Office,
PO Box 907,
Grand Cayman,
CAYMAN ISLANDS

Mr E J M Potter,
Law Draftsman.
Mr V A Tomes.

Mr A Manarangi,
Mr M.C. Mitchell
Solicitor General

Sir George Engle, KCB, QC,
First Parliamentary Counsel.
Mr C H de Waal, CB,
Mr P Graham, CB,
Mr J D M Rennie,
Mr J C Jenkins,
Miss S P Burns,
Mr D W Saunders,
Mr J S Mason,
Mr E G Caldwell,
Mr E G Bowman,
Miss L M Furlonger,
Mr G B Sellers,
Mr E R Sutherland,
Mr P F A Knowles,
Mrs M Leates,
Mr S C Laws,
Mr R S Parker,
Mr P R Lane,
Miss C E Johnston,
Miss M A R Peto,
Mr P J Davies,
Mr W G Stebbings,
Mr T W Turtle,
Mr K R Jones
Mr M Lewis
Mr J M Sellers
Miss M S Christie,
Mr D H S Robson,
Mr M L Dunlap,

The Hon Neil Davidson,
Bridgeman Morris,
64 Broadway,
Peterborough,
Cambs, PE1 1SU
ENGLAND

Mr R.A. Griffey,
57 Salisbury Road,
Downend,
Bristol, BS16 5RG,
ENGLAND

Mr A.R. Rushford,
12 Chester Row,
Belgravia,
London SW1W 9JH,
ENGLAND

The Greffier of the States,
Jersey,
CHANNEL ISLANDS.

Crown Law Office,
P.O. Box 494,
Rarotonga,
COOK ISLANDS.

Parliamentary Counsel Office
36 Whitehall,
London SW1A 2AY,
ENGLAND,

Mr T Erskine,
Mr P Grant,
Miss M Hughes,
Mr G Gray,
Mr A K Jones,
Mr A J Esdale,

Office of the Legislative Draftsman,
Parliament Buildings,
Stormont, Belfast, BT4 3SW
NORTHERN IRELAND

Mr J D Pope,
Director - Legal Division.
Mr R C Nzerem,
Dr Amrit Sarup.

Commonwealth Secretariat,
Marlborough House,
Pall Mall,
London, SW1Y 5HX,
ENGLAND.

The Hon Mr Justice G F Harwood,
Chief Justice's Chambers,
PO Box 11,
Nuku' Alofa,
Kingdom of Tonga,
S W Pacific

Mr Q B Bale,
Solicitor-General,
Solicitor-General's Office,
Suva,
FIJI.

Mr. G.E. Harre,
First Parliamentary Counsel,
Mr C.E. Borrowman,
Mr. N.J. Adsett

Crown Law Office,
SUVA. FIJI

Mr H. Roberts,
St. James Chambers,
GUERNSEY.

Mr Lebrecht Hesse,
Parliamentary Counsel,
Attorney-General's Chambers,
Marina Parade,
Banjul,
THE GAMBIA.

Mr G Nikoi,
Principal State Attorney,
Mr T.R.O. Tetteh
Mrs. S. Ofori-Boateng

Office of the Attorney-General,
Legal Drafting Division,
Ministry of Justice,
P O Box M.60, Accra,
GHANA.

Mr D Hull,
Attorney-General's Chambers,
GIBRALTAR.

Mr Kendrick Radix,
Minister of Justice &
Attorney-General,
Attorney-General's Chambers,
St George's,
GRENADA.

Mr B T I Pollard,
Legal Consultant,
Caribbean Community Secretariat,
Bank of Guyana Building,
P O Box 10827,
Georgetown,
GUYANA.

Mr M Shahabuddeen, s.c.,
Parliamentary Counsel,
22 Courida Park,
East Coast Demerara,
GUYANA.

Mr. K. Mohamed,
Parliamentary Counsel,
Attorney-General's Chambers,
Georgetown, GUYANA

Mr G P Nazareth, OBE, QC,
Law Draftsman.
Mr J F Mathews,
Crown Solicitor.
Mr E R Astin,
Mr H A de B Botelho, OBE, ED,
Mr F Cheung,
Mr J J O'Grady,
Mr J K Findlay,
Mr D Little,
Mr I C Rangel, MBE,
Mr B E D de Speville,
Mr A B S Pierce,
Mr J D Scott,
Mr D G G Jones,
Mr E H Martin,
Mr J Hopkinson
Mr J R A Hanratty,
Mr J R Crawford,
Mr D J Morris,
Mr L C McCormack,
Mr J F Wilson,
Mr A N Watson-Brown.

Legal Department,
Central Government Offices,
HONG KONG.

The Hon Mr Justice Fuad
His Honour Judge Corcoran
His Honour Judge Hopkinson

Hong Kong

Mr R V S Peri Sastri,
Secretary,
Ministry of Law, Justice
and Company Affairs,
Shastri Bhawan,
New Delhi - 110001,
INDIA.

Mr M E Boyde,
Legislative Draftsman
Mr K F W Gumbley,
Legislative Draftsman.

Attorney-General's Chambers,
Douglas,
ISLE OF MAN

Mrs H Lindsay,
Mr Justice O D Marsh,
Miss Marie E. Thompson

Office of the Parliamentary Counsel,
79-83 Barry Street,
P O Box 604,
Kingston,
JAMAICA.

Mr R Rose,
First Parliamentary Counsel,
c/o Attorney-General's Chambers,
P O Box 40112,
Nairobi,
KENYA.

Mr Michael N Takabwebwe,
Attorney-General,
Attorney-General's Chambers,
Bairiki,
Tarawa Island,
REPUBLIC OF KIRIBATI.

Mrs S M Seeiso,
Deputy Legal Draftsperson,
The Law Office,
Masseru, 100,
LESOTHO.

Mr E M Singini,
Parliamentary Draftsman,
P/Bag 333,
Lilongwe 3,
MALAWI.

Mr Abdul Malek Bin Haji Ahmad,
Deputy Parliamentary Draftsman,
Attorney-General's Chambers,
Kuala Lumpur,
MALAYSIA.

Mr A D Audoa,
Legal Officer.
Mr D N Sharma.

Government Office,
Nauru Island,
REPUBLIC OF NAURU,
Central Pacific.

Mr W Iles,
Chief Parliamentary Counsel.
Mr K W Kersley,
Mr I E Hurrell,
Mr R G F Barker,
Mr N J E Richards,
Mr P W Williams,
Mr G E Tanner,
Mr D J Cochrane,
Mr J G Hamilton.

Parliament Buildings,
Wellington 1,
NEW ZEALAND.

Mr Mu'Azu Abdul-Malik,
Legal Draftsman,
Federal Ministry of Justice,
Legislative Drafting Department,
Old Secretariat,
Marina, Lagos,

NIGERIA.

Mr I Anozie,
Mr V N Okeke,
Mr L M Agoro,
Mr G O Mowoe,
Mr G K Igiehon,
Mr U E Ihewe,
Mr N U Ejekam,
Mr S Chigbue,
Mr R N Eze,
Mr O Y Mwane.

Nigeria National Assembly,
Lagos,
NIGERIA.

Mrs R N Ukeje,
Mrs A Ajoni,
Mrs M Tiga,
Mrs Bola Belo,
General B M Haruna,
Dr O Aina.

NIGERIA.

Mr E C Enekwechi,
Legal Draftsman.
Mr M T N Onwugbufor,
Chief Legislative Draftsman.
Mr E A Nzegwu,
Deputy Legal Draftsman

Ministry of Justice,
P.M.B. 1041, Enugu,
Anambra State,
NIGERIA.

Mr I Garndawa,
Attorney-General's Chambers.
Mr U Bukar Bwala,
Clerk of Assembly.

Maiduguri,
Borno State,
NIGERIA.

Mr E D U Idiong,
Ministry of Justice,
Calabar,
Cross River State,
NIGERIA.

Mr B A Raji,
Mr B N Mamuno

Ministry of Justice,
Yola,
Gongola State,
NIGERIA.

Mr B N Mamuno,
Solicitor-General,
Yola,
Gongola State,
NIGERIA.

Mr S Atiku,
Legal Drafting Division
Ministry of Justice,
Kano, PMB 3040
NIGERIA.

Mr S D Osakue,
Director of Legal Drafting,
Ministry of Justice,
Benin City,
Bendel State,
NIGERIA.

Mr M Isiaku,
Ministry of Justice,
Minna,
Niger State,
NIGERIA.

Mr J A O Olowo,
Chief Legal Draftsman,
Ministry of Justice,
Akure,
Ondo State,
NIGERIA.

Mr S Aliyu,
Mr A B Dikko

Ministry of Justice,
Private Mail Bag No. 2102
Sokoto,
Sokoto State,
NIGERIA.

Mr M A Abubakar,
Senior Parliamentary Counsel,
Bauchi State House of Assembly,
P O Box 0232,
Bauchi,
NIGERIA.

Mrs R H Cudjoe,
First Legislative Counsel.
Mr A A Yahaya,
Deputy First Legislative Counsel.

Kaduna State Legislature,
Lugard Hall, P.M.B. 2125,
Kaduna,
NIGERIA.

Mr J A Oni,
Clerk
Ondo State House of Assembly,
Private Mail Bag 802,
Akure,
NIGERIA.

Mr. J.M. Fraser,
First Legislative Counsel,
Office of the Legislative Counsel,
P O Wards Strip,
Waigani,
PAPUA NEW GUINEA.

Mr K N Krishnan,
Ms L. Elliott,

Attorney-General's Chambers,
Ministry of Legal Affairs,
Government Buildings,
Castries.
SAINT LUCIA,
West Indies.

Mr N J Adamson, CB, QC,
Mr C M Clark,
Mr D J S Duncan,
Mr P J Layden TD,
Mr G Kowalski,
Mr J D Harkness,
Mr C A M Wilson,
Mr D C Macrae,
Mr J C McCluskie.

The Law Advocate's Department,
Fielden House,
10 Great College Street,
London SW1P 3SL
ENGLAND

Mr J F Wallace,
Mr G S Douglas, QC,
Mr W C Galbraith, QC.

Scottish Law Commission,
140 Causewayside,
Edinburgh, EH9 1PR,
SCOTLAND.

Dr A G Donaldson,
University of Edinburgh,
Edinburgh,
SCOTLAND.

Mr P J Keenan,
25 Dalcraig Crescent,
Dundee, DD4 7QX,
SCOTLAND

Mr L J Chinery-Hesse,
Law Officers Department,
Guma Building,
Lamina Sankoh Street,
Freetown,
SIERRA LEONE.

Mr Koh Eng Tian,
Solicitor-General,
Attorney-General's Chambers,
High Street,
SINGAPORE, 0617.

Mr B P Bhatnagar,
Legal Draftsman,
Attorney General's Chambers,
P O Box 111,
Honiara,
SOLOMON ISLANDS.

Mr P N K Rodrigo,
Legal Draftsman.
Mr N S Abeyesekere,
Mr S L D Bandaranayake,
Mr M E Gunoratne,
Mrs R F de Soyza,
Miss P Nadarasar,
Mrs T Perera,
Miss P Ouitigala.

Legal Draftsman's Department,
Hulftsdorp,
Colombo 12,
SRI LANKA.

Miss P I Senavatne,
Legal Draftsman,
Ministry of Justice,
Colombo,
SRI LANKA

Mr Carl L Joseph, GC,
c/o The Solicitor-General,
Attorney-General's Chambers,
Kingstown,
ST VINCENT & THE GRENADINES.

Mr S W Tapley Seaton,
Attorney-General's Office,
ST. KITTS, ST. CHRISTOPHER AND NEVIS

Mr D.L. Mendis,
Office of the Legal Draftsman,
P.O. Box 164,
Legal Department,
Government Headquarters,
ST. KITTS, ST. CHRISTOPHER AND NEVIS

Mr S B Mnisi,
Legal Draftsman,
P O Box 578,
Mbabane,
SWAZILAND.

Mr D P Makanza,
Attorney-General,
Mbabane,
SWAZILAND.

Mr D S Meela,
Deputy Attorney-General
and Principal Secretary.
Ministry of Justice,
Dar es Salaam,
TANZANIA.

Mr S K B Lushagara,
Chief Parliamentary Draftsman.
Attorney-General's Chambers,
P.O. Box 9050,
Dar es Salaam,
TANZANIA.

Miss Monica Barnes, QC,
Chief Parliamentary Counsel.
Mr S Miller,
Mrs L Curvam,
Mrs C Blake,
Mr G Bridgewater.

Park Plaza,
Cnr. Park and Vincent Streets,
Port-of-Spain,
Trinidad W 1,
TRINIDAD AND TOBAGO.

Mrs M R S Ndawula,,
Office of First Parliamentary Counsel,
Parliamentary Buildings,
P O Box 406,
Kampala,
UGANDA.

Mr A Garneau,QC,
Attorney-General and
Parliamentary Counsel,
P O Box 27,
Apai,

WESTERN SAMOA.

Mr H Mohindra,
Chief Parliamentary Draftsman,
Ministry of Legal Affairs,
Attorney-General's Chambers.
P O Box 50106,
Lusaka,
ZAMBIA.

Mr C C Manyema,
Solicitor-General,
Lusaka,
ZAMBIA.

Mr A R McMillan,
Solicitor-General,
(Director of Legal Drafting),
Private Bag 7751,
Causeway,
ZIMBABWE.

Mr V.C.R.A.C. Crabbe,	Ministry of Legal and Parliamentary Affairs,
Director,	Private Bag 7751,
Commonwealth Secretariat	Causeway,
Legislative Drafting Course,	Harare,
Mr D.M. Zamchiya,	Causeway,
Permanent Secretary,	ZIMABWE.
Mr T. Chitsiku	
Mr N.M. Dias	
Mr M. Gooneratne	
Ms B.M. Kahari	
Mr S. Karangizi	
Mr G. Liundi	
Ms D. Mandaza	
Mr M.J. Mutyavaviri	
Mr. J.N. Aryee	
Mr K.D. Kifli	Address unkown
Mr O.A. Labodes	"
Mr L. Denyeng	"
Mr W.M. McGregor	"

25 February 1985