



Hunt & Hunt
LAWYERS

China Free Trade Agreement

Hunt & Hunt submission

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Invitation to provide submission

Hunt & Hunt refers to the letter dated 2 April 2004 from David Holly (as the Head of the China FTA Study Taskforce) inviting submissions into the Feasibility Study being conducted by the Department of Foreign Affairs & Trade as forming part of the Trade and Economic Framework between Australia and the People's Republic of China ("PRC").

Hunt & Hunt is delighted to accept the kind invitation to make a Submission into the Feasibility Study which is set out below.

Our experience in working with China

Hunt & Hunt has been working with China for over 16 years, acting for Chinese and foreign clients on matters ranging from traditional joint ventures, trading contracts, dispute resolution/arbitration, establishing branch offices and more recently wholly owned enterprises (WOFE).

We were granted a foreign lawyers licence for Shanghai in 1998 and have had the experience of dealing with legal and logistical requirements to establish our office in Shanghai.

We have worked with both Australian & Chinese Government agencies to assist to develop skills relating to business structures and commercial law and improving dispute resolution processes.

As a result, Hunt & Hunt has the unique capacity to reflect on the changes to the PRC, the current status of its economy, commercial infrastructure and the prospects of a Free Trade Agreement (“FTA”) between Australia and the PRC.

We very strongly support the efforts to establish an FTA with PRC.

It is clear that PRC and its economy will be key drivers for the global economy well into the 21st Century and for Australia this presents a unique opportunity within our region to share in the benefits of the growth and development of PRC.

Australia has established a very strong and warm relationship at many levels with PRC and whilst there are many challenges on both sides the strength & warmth of the relationship provides an excellent bridge upon which an FTA can be developed.

Hunt & Hunt appreciates that the Trade and Economic Framework between Australia and the PRC (“Framework”) sets out the process to be adopted by the countries to bring their economies closer together and the criteria to be considered when making a decision whether to proceed to a FTA.

As a general proposition, we endorse the process described in the Framework and believe that having observed that process, the interests of both nations would be served by a FTA.

We believe that the PRC has made significant strides in moving away from a centrally planned economy, through its status under the World Trade Organisation (“WTO”) as an “economy in transition” towards a Full Market Economy (“FME”).

While we are not experts in assessing the status of an economy (or what constitutes a FME in economic terms), we believe that PRC satisfies a majority of normal criteria for acceptance as a FME as generally accepted under the WTO arrangements and, to the extent that it may not yet satisfy all those criteria, it is strongly committed to implementing procedures to reach that status.

Acceptance of current status and then a phased approach to further reform for the PRC

In making any determination as to whether the PRC has achieved the status of an FME to support an FTA, the Australian Government should take into account the specific and unique characteristics of the PRC economy and social structure.

It is easily forgotten that just over 100 years ago PRC was still essentially operating with the Emperor under and a feudal system with regional and local families controlling every aspect of daily life.

The economic and structural reforms in PRC in the last 20 years have compressed a process which in “developed” countries commenced with the Industrial Revolution in the 18th Century, the end result in PRC whilst not perfect in an historical context is quite remarkable.

Hunt & Hunt notes that the Framework (Article 8) obliges Australia to recognise the PRC as an FME as a precursor to negotiating an FTA.

Whilst clearly each nation must strive to ensure its interests are protected and enhanced by an FTA we would strongly urge the Australian Government to consider & recognise the results achieved by the PRC Government in reforming its economy and be sympathetic and realistic in any demands to be placed upon the PRC Government on entering into a FTA.

In the balancing process required in any negotiations not only is it important to strive for a positive outcome in terms of an FTA for both PRC and Australia but also to recognise how Australia approaches the task can have tremendous spin off benefits not only with PRC but also in terms of wider relationships in the region which can produce additional benefits for Australia and our neighbours in Asia.

We would offer the following for consideration:

- Avoid unrealistic economic criteria of an FME

Hunt & Hunt would recommend that in making any decisions regarding future free trade negotiations with PRC, the Australian Government should not confine itself to any test or economic model which requires the PRC to have achieved a perfect FME as a prerequisite to an FTA.

No economy in any “developed” nation has a “perfect” FME, all have different levels of conditions, restraints and national interests. Similarly, FTAs do not require or guarantee totally free trade between contracting nations.

In all cases there are reservations associated with accepted national and international interests. Many FTAs acknowledge that there will be improvements in various sectors over time.

To this end, the Australian Government should recognise that any “imperfections” in the PRC economy should not preclude an FTA and should allow PRC to address those specific issues over time rather than by way of immediate and revolutionary reform.

- Acknowledge PRC’s efforts in economic transformation

PRC has already demonstrated a capacity and commitment to economic reform and a willingness to take some risks by moving quickly as was clearly evident in the 1990’s.

The PRC Government has effected significant economic and structural reform and Australian Government should acknowledge the efforts of the PRC Government to reform its economy and legal systems to satisfy the requirements of the WTO and its subsequent further move towards a FME and this would warrant some accommodation in expectations on the PRC.

- Need to Maintain Stability in PRC

The challenges faced by PRC having regard to it’s population, regional and cultural diversity are unique and must be understood. PRC demonstrated a high level of economic resilience, stability and responsibility during the Asian financial crisis.

Clearly it is important for the region and globally that PRC remains stable during periods of change and one must be cautious not to force changes for the sake of meeting economic models which create instability and thereby losing the benefits of a FTA in the longer term.

We have observed already the challenges created by the pace of economic reform, they have not been without cost and have created a tensions between those within PRC who have significantly improved their position and those who have lost their jobs.

PRC is making considerable efforts to maintain broad support in particular addressing the disparity between the rapidly developing economy in East China compared with the West and we have been directly involved in several projects to develop the West.

It would create significant disadvantage (and possibly significant social unrest) if Australia were to demand too many radical reforms or acceleration of reforms to the potential detriment of social structure.

- Future expectations based on PRC’s current state

Any efforts by Australia to extract additional concessions or demands in the acceleration of further reform by the PRC Government should be tempered by the realities of the PRC economy.

The PRC is in many respects a collection of a variety of economies in different geographical regions governed by different local products and levels of development.

The PRC has a massive population including a significant social strata which has yet to be directly involved in economic reform. For example, there are still many people operating on older socialist models of land use and exploitation particularly in western provinces.

- The Accession Protocol of PRC

The PRC joined the WTO by entering into the Accession Protocol on 23 November 2001. The PRC should not be obliged to act in a way inconsistent to that Accession Protocol.

For the reasons set out above, Hunt & Hunt endorses an approach to the FTA which recognises and accepts current the specific position of the PRC as sufficient basis for an FTA and then permits a phased reform process of increasing liberalisation in a manner sympathetic to the status of the PRC society.

Any expectations should also be consistent to PRC's Accession Protocol and should not be more onerous than provided for in the Accession Protocol.

Consistent to other FTA's, an FTA with PRC should incorporate committees and working groups to assist with the further liberalisation of the PRC economy.

We believe that there is precedent for this approach in other FTA's (including, for example, the way in which quotas and tariff rates are only to be reduced over time in the FTA with Thailand).

Hunt & Hunt is aware that the negotiations regarding the proposed FTA with the PRC are being conducted in an international context where many countries are moving to commence negotiations for regional or bilateral FTAs.

Many other western, developed nations (in particular the US) are paying careful attention to the negotiations between Australia and the PRC one must be mindful that in negotiating an FTA with the PRC, the concessions it seeks or secures will be demanded in other negotiations.

Without limiting the generality of our endorsement of an FTA, Hunt & Hunt sets out below some commentary on specific issues which would need to be addressed in negotiations for an FTA with the PRC.

These issues reflect our practice areas, the interests of our clients and they experience from working in PRC over some 16 years.

The majority of these issues relate to the liberalisation of the means of access to the PRC economy and the way in which Australian entities are permitted to operate within that economy.

- Access to legal markets

The PRC Government should continue to liberalise access for Australian lawyers.

This should include the following.

- Limit the restrictions on Australian lawyers who wish to work as lawyers in the PRC.
- Limit the restrictions on Australian law firms opening up satellite offices in the PRC.
- Limit the restrictions on Australian law firms working for Government in the PRC at any level.
- Allow greater access of Australian students to study law in the PRC.

- Elimination of Customs duties

One of the basic requirements for an FTA is the elimination (or reduction) of Customs duties.

Hunt & Hunt appreciates that not all tariffs can be eliminated immediately and that the particular position of sections of the PRC economy may dictate that certain tariffs only be reduced over time. Similar considerations may dictate phased reduction in Australian tariffs.

However, the primary consideration is to reduce tariffs as early as is possible and our view is that slow reductions serve the interests of neither country. To support these reductions, both countries will presumably take some comfort from the fact that there will be protection in Anti-Dumping legislation and the availability of Safeguards for certain industries (described below)

In addition to the agreed tariff reduction rates, both countries should have the right to ask for faster reduction from the other country or to reduce their rates unilaterally.

- Import and Export Permits and Quotas

The PRC Government has an extensive regime for import and export permits which is perceived to be more than the regime implemented by the Australian Government. The PRC Government also maintains many quota restrictions which exceed Australian quota restrictions.

Permit and quota restrictions constitute significant non-tariff barriers and work will need to be undertaken to determine which of these restrictions represent legitimate national interest.

Quotas need to be reduced and phased out over a reasonable period. Both countries co-operate in developing agreed procedures for administration of quotas and to minimise the anti-competitive effect of quotas. Protections to specific industries can be found in “provisions for safeguards” set out below.

- Future of Free Trade Zones and Special Economic Areas

The PRC Government has encouraged overseas investment and development through different treatment of entities operating in Free Trade Zones and Special Economic Areas.

However, the underlying concept of an FTA is that one contracting nation to the FTA will not afford treatment to the entities of other countries which is more advantageous than the treatment afforded to the other contracting nation.

The treatment afforded to entities in the Free Trade Zones and Special Economic Areas will need to be reviewed carefully to ensure that entities from countries other than Australia operating in those areas are not afforded treatment which is more advantageous than that provided to Australian entities.

The Australian Government will need to consider carefully how it will treat any requests to permit the continuation of Free Trade Zones and Special Economic Areas.

- Rules of Origin

Although “Rules of Origin” (“ROO”) are technically part of the Customs administration, the ROO deserve separate consideration as they represent the criteria for favourable tariff treatment.

Of recent time, there are essentially 2 separate approaches to ROO, being the approach in the Australia and Singapore Free Trade Agreement (“SAFTA”) and the different approach in the Australia and US Free Trade Agreement (“AUSFTA”).

The approach in the AUSFTA appears to be very similar to the approach in the Thai and Australia Free Trade Agreement (“TAFTA”) subject to some different treatment in requirements for “regional value content” in the TCF and motor vehicle areas.

The AUSFTA affords protection to goods wholly obtained or produced in a contracting party using products of that country. Goods from “third countries” are allowed as inputs if those goods undergo a change in Tariff Classification.

In general, it is our view that the approach to ROO in the AUSFTA should be adopted as a means of determining the products of either nation which attracts preferential treatment.

However, specific consideration should be given to whether the specific ROO (and associated regional value content for TCF goods or motor vehicle components) should be adopted in their entirety in any FTA with PRC.

It is our view that the specific regional value content requirements for motor vehicle components may be warranted but the specific rules for TCF goods in the AUSFTA should not be adopted in the same form. They appear to be unnecessarily complex and contrary to the notion that all ROO need to be clear and easy to administer.

- Foreign exchange and currency movement restrictions

One of the main concerns in conducting business in the PRC is the ability to repatriate moneys earned in the PRC. This constitutes another non-tariff barrier to trade and will need to be reviewed to enable the repatriation of earnings.

- Recognition of Professional Qualifications and Trade in Services

Hunt & Hunt endorses the approach in other FTA's of the establishment of an expert working group to consider the basis on which educational and professional qualifications of the members of both nations can be recognised by other nations. This will assist in the cross-border trade in services which require certain professional standards or qualifications.

For the purposes of focus in relation to the trade in those services.

- Specific focus on improving trade in services

Certain areas should be identified for specific focus. Relevant areas could include.

- Research and Development
- Education
- Health Care
- Tourism
- Telecommunication Services
- General commitment to GATS process

Other than the specific areas, there should be a general commitment

to liberalisation of the trade in services based on the provisions of the General Agreement of Trade in Services (“GATS”).

- Intellectual Property Rights

Consistent with other Australian FTA’s, any FTA with the PRC should reflect the continued commitment of both nations to become parties to all International Conventions protecting Intellectual Property. This also includes the WTO Agreement on Trade-Related aspects of Intellectual Property Rights. This should require both nations to continue their accession to those Conventions and Agreements.

Of particular importance is the commitment of the PRC Government to protect the intellectual property of Australian entities including aggressive enforcement action. This should include jail terms for continuing breaches in a manner consistent to recent Australian legislation and practice.

- Anti-Dumping and Countervailing measures

Both countries should reaffirm their commitment to the WTO Agreements on Anti-Dumping Measures and Subsidies and Countervailing Measures.

Particular interest will be whether Australia is prepared to formally (and finally) commit that PRC is not an “economy in transition” for the purposes of the WTO Agreements. This would be a significant concession as pursuant to the Accession Protocol, the PRC is treated as an “economy in transition” for the purposes of the WTO Agreements.

- Safeguards

Hunt & Hunt endorses general safeguard provisions consistent to other WTO Agreements and other FTA’s. This will specifically arise for Australia in relation to TCF imports from PRC.

There should be careful attention to the ability of a country to adopt transitional safeguards, requiring thorough investigation and consultation with the other country. Further, there should be reservations against adopting extensive “special” safeguard measures such as under the TAFTA.

- Customs Administration

As a general proposition, Hunt & Hunt sees significant merit in the PRC and FTA containing provisions similar to those in the AUSFTA regarding Customs administration. Australia and the PRC have already worked together on these issues. Without limitation, this should include the following.

- Administrative Fees and Formalities

Other than fees and charges permitted under Article III of the GATT

(Customs duties and internal charges) and anti-dumping and countervailing duties, any fees and charges must be limited to the approximate cost of those services and not represent indirect protection.

- Transparency

Both countries should commit to clear and transparent administration of Customs laws. These are vital in aiding trade. This should include the publication (in hard copy and electronic form) of relevant legislation and the issue of advisory opinions and binding rulings (both public and private). All commentary should be available in both languages.

- Clearance of cargo

The significant amount of cargo between the two countries requires agreement that there should be minimal delays to the clearance of cargo. The specific criteria for normal and express cargo clearance in the AUSFTA should be adopted as a benchmark.

- Exchange of information

It is in the interests of both nations that Customs authorities are able to exchange information on the arrival and departure of goods. This assists cargo management, border control, national statistics, identification of criminal activity and revenue collection.

Standards of information exchange and co-operation as set out in the AUSFTA are recommended. This can provide for more extensive disclosure in the context of perceived illegal activities.

- Customs Broking

The existence of a properly trained and licensed Customs broking industry assists in the timely and accurate reporting of the passage of cargo.

We would recommend the establishment of a national, licensed, customs broking regime similar to the Australian model.

- Valuation

Valuation should adopt WTO practices and those dictated by the World Customs Organisation (“WCO”). As indicated above there should be provision for binding private and public rulings.

- Classification

Classification should also reflect practices of the WTO and WCO together with the availability of rulings.

- Use of Information Technology and Modernisation

Increased use of Information Technology in the reporting of the

transport of goods aids trade and also aids the task of the Customs administrations.

For these purposes, both nations should continue to work to implement the provisions of the Revised Kyoto Convention. Work should also be undertaken to enable reporting parties in both countries to report electronically and directly into the systems operated by the Customs administrations of both countries.

For example, parties in Australia should be able to also report the import of those goods directly into the PRC Customs systems. For these purposes, it will require exporters and importers to hold Digital Certificates to verify identities which are to be recognised by both countries.

- Registration of Exporters and Provision of Certificates of Origin

Hunt & Hunt appreciates that there are different approaches to whether it is an importer or exporter who must verify the qualifying (“originating”) status of goods.

Our view that the preferable approach is that set out in the TAFTA which obliges an exporter to be registered as producing “originating goods” and for Certificates of Origin to be provided with each shipment.

Such approach permits verification of status of exporters. Although this is more rigorous than in the AUSFTA, we believe that it assists certainty and compliance more than in the AUSFTA.

- Administrative penalties and prosecutions

There should be consistency in the application of administrative penalties and types of prosecutions. Traders in both countries should have some comfort that they are subject to similar legislation and trading requirements in both countries.

- Quarantine

Hunt & Hunt endorses continued work on quarantine regulation as set out in the Framework and which is also consistent with the WTO Agreement on Sanitary and Phytosanitary Measures. Both nations will require high levels of legitimate quarantine protection.

- Investment

Hunt & Hunt endorses the approach set out in the Framework to encourage investment.

In addition, the following matters warrant additional consideration.

- FIRB Restrictions

There should be a review of the FIRB restrictions in Australia to

consider whether those restrictions constitute an unfair restraint on PRC investment. There does not appear to be significant evidence of investment being withheld by FIRB and as a result the existing FIRB restrictions appear to be adequate and not requiring review as in the AUSFTA.

- Levels of Domestic Regulation in the PRC

Hunt & Hunt perceives that many problems exist for Australian entities wishing to invest in PRC from the multiple levels of regulation of investment by different levels of PRC Government and the fact that this regulation changes so regularly.

It is often difficult for Australian investors to manage the variety of different entities existing in the PRC and the different levels of permitted activity.

We would encourage the reform of the different types of regulation affecting establishment of operating companies to enable more direct investment. Any regulation should be transparent and not subject to unilateral change.

Investment would be assisted by one set of Government regulations and more liberal means of direct investment, removing the current complex structure.

- Mandatory Use of Local Labour Service Companies

This represents one of the more significant restrictions on direct investment. The need to use these companies represents a cost to business. Direct employment should be liberalised to parties beyond those currently able to do so. The current restrictions based on the type of approved entity should be revised.

• Dispute Resolution - Investor/State Resolution Provisions

Consistent with other FTA's we believe that the FTA with PRC should include a general mechanism for the countries to resolve disputes as to the application of the FTA by way of diplomatic negotiations, and, ultimately, Arbitral Tribunal.

However, there are some concerns that PRC regulations may not yet afford adequate protection to individual investors who believe that they are being disadvantaged by inadequate implementation of the FTA.

Consistent with the TAFTA we believe that there should be an Investor/State dispute resolution provision to protect individual investors.

• Shipping restrictions

There appear to be real concerns that "Conference" arrangements for shipping between PRC and Australia increases costs and limits services although they are permitted by the ACCC. This is creating a very real

limitation on trade. The FTA should incorporate an independent, specific review of these shipping practices and provision to allow new entrants.

- Migration and Visa Restrictions

Hunt & Hunt recognises the sovereign right of nations to control immigration. However, there will need to be some relaxation to the current visa restrictions to accommodate increased business investment and international provision of services.

There should be better accommodation in the provision of the visas. Applicants for business visas should not be obliged to wait in person for many hours in lines at Chinese Consulate for their visas.

- Capital Market Reform

We believe that PRC should continue their commitment in reforming capital markets, especially in liberalising the access of Australian Companies and in adopting regulation consistent with international standards.

Australian investors should be able to invest directly in PRC Capital markets, feel confident that their investments are protected and that the markets are being conducted in a transparent and fair manner. Hunt & Hunt would encourage the PRC Government to continue their efforts to eliminate unfair practices such as market manipulation and insider trading. Australian entities should have better access to list and raise money in PRC markets.

In a manner consistent to other Australian FTA's, we believe that the FTA with the PRC would benefit from the establishment of bilateral Advisory Committees to work together to facilitate the FTA and achieve the aims of the FTA.

Hunt & Hunt strongly endorses an FTA between Australia and the PRC.

The final wording of an FTA is very important but the real strength & substance of any FTA with PRC will be found in the process to achieve this outcome. In Asia mutual obligations rely on “guangxi” (relationships) to give real substance to written agreements.

No FTA will ever be perfect nor will it satisfy every interest group and the task of government is to strike a balance which is “politically” acceptable and still moves to meeting the economic and structural concepts of free trade.

Whilst the primary objective of the negotiation process is a signed FTA it is just as important that we use the process to strengthen our bi-lateral relationship the sometimes over used “win win” concept is very important in this FTA round.

We believe that an FTA represents a significant opportunity for Australia to entrench its relationship with the PRC as a major trading partner, and enables Australia to enhance its position as an international leader in the advancement of free trade.

We confirm our previous offer to assist and contribute to important this exciting and important initiative.

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Jim Harrowell

Partner

Legal and Management Experience

Jim qualified with degrees in Law and Accounting and has 27 years experience working as a commercial lawyer having joined Hunt & Hunt in 1977, he has been a partner of the Firm for 21 years

Jim has represented the interests of Australian and international companies in their business activities, including negotiating joint ventures and resolving disputes through mediation, litigation and arbitration.

He is an adviser to clients on legal, strategic, commercial, governance and reputation issues applying his legal skills and experience together with his experience in management both in Australia and overseas.

Since first being appointed to open and manage the Newcastle office of Hunt & Hunt in 1983, Jim has fulfilled a number of management roles within the firm. He is the immediate past Managing Partner of the firm and has also held the position of National Chairman of the Hunt & Hunt Legal Group; in this period the group grew significantly and now has offices throughout Australia, Shanghai and Auckland.

International Roles

Jim is the international Chairman of Interlaw, an association of 65 law firms with 6500 lawyers in 116 major cities throughout the world. A key areas of focus has been Asia, China in particular which Jim has travelled to regularly over nearly 15 years.

He was responsible for Hunt & Hunt obtaining one of six licences granted to Australian law firms. He opened the Shanghai office of Hunt & Hunt in 1998 and assisted both local and foreign enterprises doing business in the region. Jim is also an accredited foreign arbitrator with the China International Economic & Trade Arbitration Commission ('CIETAC') and is also the only Australian who has been accredited as a foreign arbitrator by the Shanghai Arbitration Commission.

Other Roles and Activities

Jim has been a director and is currently Chairman of the Aged Care Standards and Accreditation Agency in the period where the Agency successfully completed two cycles of mandatory accreditation for Aged Care facilities throughout Australia.



Andrew Hudson

Partner

Andrew provides legal services to all parties involved with the Customs Industry including Importers, Exporters, Customs Brokers, Freight Forwarders, Shippers and Trade Financiers.

The advice he provides covers all aspects of trade ranging from International Trade Conventions, Arbitrations to resolve disputes, Trade Financing options, Commodity and Freight Contracts, dealings with Inquiries and prosecutions by the Australian Customs Service in such matters as Dumping and alleged underpayments of Customs duty, together with all related litigation.

As well as providing legal services in the Customs and Trade Industries, Andrew has been extensively involved in Law reform issues through his capacity as Chair of the Customs and International Transactions Committee of the Law Council of Australia and as a member of the Steering Committee of the International Law Briefing Committee of the Law Institute of Victoria. This has included submission (both written and oral) to the Senate Inquiries on Trade Modernisation Legislation, Legislation imposing strict and absolute liability offences (including for Customs offences) and new Anti-Dumping Legislation.

In addition to his many publications, Andrew has also spoken extensively on Customs and Trade issues including a presentation on “Adaptation of Customs Procedures for E-Commerce and Paperless Trading” at the APEC Customs/ Business Dialogue in Shanghai in August 2001. He was a presenter on the topic of “Customs Issues in Classification and Valuation” at the World Conference of the International Federation of Customs Brokers Association in Venice in May 2002.

Andrew has also conducted (and continues to conduct) seminars around Australia for the Customs Brokers and Forwarders Council of Australia on the recent Australian “Trade Modernisation” Legislation, new Australian Privacy Laws and Liability of insurers for goods damaged in transit. This has included developing and presenting with the CBFCA, training programs to assist Industry with the changes effected by the Trade Modernisation Legislation.

Further, Andrew was a panelist for the on-line seminar entitled “Practising Law in a Global Economy” conducted by law.com.

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