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 The Old Supreme Court Building, photographed in April 2007	
Court	High Court of Singapore
Full case name	*Re Fong Thin Choo*
Date decided	29 April 1991
Citation(s)	[1991] 1 S.L.R.(R.) 774
Judge(s) sitting	Chan Sek Keong J. (as he was then)
Case opinions	
The court can order a prohibitory order against the Government when the decision-maker acted on an incorrect basis of fact due to an insufficient inquiry into the facts.	

Re Fong Thin Choo is a case in administrative law decided by the High Court of Singapore concerning the legality of the Director-General of Customs and Excise's ("DG") demand that the applicants pay $130,241.30 in customs duty. The case was presided over by the Honourable Justice Chan Sek Keong (as he was then). The court decided that the DG's demand was based on a decision made contrary to law and approved an order of prohibition that prohibited the DG from collecting the sum from the applicants.

Re Fong Thin Choo appears to have introduced error of material fact into Singapore case law as a ground of judicial review. While the term "error of material fact" was not explicitly stated in the case, *Re Fong Thin Choo* quoted and applied the elements discussed in the UK case of *Secretary of State for Education and Science v Tameside Metropolitan Borough Council*: courts may interfere with government decisions when there is 'misunderstanding or ignorance of an established and relevant fact' and/or "the minister has acted…upon an incorrect basis of fact". This ground of judicial review was subsequently recognised as "error of material fact".[1]

Facts

Around 12 December 1981, the applicants, Szetoh Import & Export Pte Ltd removed a large quantity of cigarettes ("the goods") from a licensed warehouse and transported them to the port for loading onto *MV Sempurna Sejati* ("the vessel") to be exported out of the country. Although the Customs supervised the removal and transport of the goods, the Customs did not supervise the loading of the goods onto the vessel. Subsequently, the applicants delivered to the Customs three outward declarations showing that the goods had been loaded onto the vessel.[2]

Months later, a customs officer discovered that the goods had not been entered into the vessel's manifest.[3] The DG then made inquiries with the agents of the vessel ("TTS"), who denied that the goods had been loaded.[4] The DG subsequently asked the applicants to furnish evidence of the export of the goods.[5] On 19 September 1988, the applicants produced a document signed by a businessman ("TKM") stating that he had purchased and received the goods.[6] After further correspondence, the DG concluded that the goods had not been exported and requested the applicants to pay $130,241.30 in customs duty.[7]

On 30 December 1988, the applicants applied for a writ of prohibition to prohibit the DG from recovering this sum. When the Court was hearing the application to grant leave, the state counsel, relying on s 27 of the Government Proceedings Act (Cap 121),[8] submitted that the court had no jurisdiction to issue an order of prohibition against the government.[9]

Legal issues

Justice Chan Sek Keong ("Chan J") identified two legal issues:

- Whether s 27 of the Government Proceedings Act strips the court of its jurisdiction to grant an order of prohibition against the Government.
- Whether the DG had acted on an incorrect basis of fact (error of material fact) when deciding if the goods had been exported under reg 12(6) of the Customs Regulations 1979.[10]

Judgment

- The court had jurisdiction to issue an order of prohibition against the DG's decision, as s 27 of the Government Proceedings Act did not strip the court of such jurisdiction.[11]
- There was an error of fact as to whether the goods had been exported. This fact could have been verified objectively with evidence but the DG did not carry out an adequate investigation.[12] Hence, the DG acted on an incorrect basis of fact in arriving at his decision and an order of prohibition was entered against the DG.

Grounds of decision

Jurisdiction to order prohibition

Chan J began by affirming that the court had jurisdiction to issue an order of prohibition against the government. He rejected State Counsel's argument that, based on s 27 of the Government Proceedings Act,[13] the court did not have this jurisdiction as s 27 stipulates that courts cannot grant an injunction with regard to civil proceedings.[14] However, it was held that while s 27 applied to civil proceedings, it did not relate to judicial review proceedings and hence, did not affect the court's jurisdiction to grant an order of prohibition in the judicial review of government proceedings.[15]

Chan J further held that the principles applicable to *certiorari* were equally applicable to an order of prohibition. The principles relating to *certiorari* were stated in *R v Criminal Injuries Compensation Board, ex parte Lain*,[16] where it was held that *certiorari* could be sought against decisions made by public authorities in the exercise of public duties.[17] Therefore, Chan J held that as the DG was a public officer appointed to discharge public duties, his decision was an exercise of public duty[18] and hence the DG could be subjected to an order of prohibition if he acted in excess of his authority.

Incorrect basis of fact (error as to material fact)

Chan J examined the case on the basis that the DG had the discretion to decide if the evidence provided to him accounted for the export of the goods, and could order for the Customs duty to be paid if he had a factual basis for concluding that the goods had not been exported. Should the DG not have such a factual basis, he would not be able to request for the Customs duty to be paid, or he would have acted upon an incorrect basis of fact.[19]

Case law

As there was no prior Singaporean case that dealt with error as to material fact as a ground of judicial review, Chan J relied on UK cases to ascertain the law with regard to this ground of judicial review.

The case Chan J relied on was *Secretary of State for Education and Science v Tameside Metropolitan Borough Council* ("*Tameside*"),[20] where it was held that provisions which were framed to include the word "satisfaction" may exclude judicial review on matters of pure judgment by the decision-maker, but judicial review would not be excluded in all cases.[21] Lord Wilberforce held that when the judgment was dependant on the existence of relevant facts, the court would have to ascertain if the facts truly existed and if they were properly taken into account, although the evaluation of the facts was for the decision-maker alone.[22] If these requirements were not met, the court was entitled to challenge the decision.[23] The court could intervene on the grounds that the minister had acted outside his powers, outside of the purpose of the legislation empowering him, unfairly, or upon an incorrect basis of fact.[24] Additionally, Lord Diplock mentioned that it was also necessary to consider if the decision maker had taken into consideration only matters which he ought to have considered.[25]

Application of the law to the case

Chan J proceeded to examine the statutory scheme relating to the export of dutiable goods and the imposition of customs duty on such goods. He focused on reg 12(6) of the Customs Regulations 1979,[26] which provides that:

> "The owner of any goods removed under the provisions of this regulation or his agent shall, if so required by the proper officer of customs, produce evidence that such goods have been exported or re-exported and shall pay the customs duty leviable on any part of such goods –
>
> (a) not accounted for to the satisfaction of the proper officer of customs; or
>
> (b) if they are found to have been illegally re-landed in Singapore."

As in *Tameside*, the condition of the word "satisfaction" in reg 12(6)[27] is not a matter of pure judgment or opinion. It is also concerned with an inquiry as to a fact, namely, whether dutiable goods have been exported.[28] Thus, the applicants had to produce evidence to show that the goods had been exported and this evidence had to be to the satisfaction of the DG.

Applying the principles laid down in *Tameside*, Chan J affirmed that the test to ascertain if the DG's decision was valid was to determine if the DG could reasonably have come to his decision based on the evidence before him,[29] or, in other words, whether the DG had decided based on a tenable factual basis.

Chan J's answer to this question was in the negative.[30] His decision to allow the prohibition was based on four grounds:[31]

> (1) The DG could not have reasonably reached his conclusion without hearing the applicants' witnesses.
>
> (2) The DG misdirected himself on the nature of evidence required under reg 12(6)[32] to prove the export of the goods.
>
> (3) The DG, in making an insufficient inquiry, failed to take into account relevant considerations before arriving at his decision.
>
> (4) The investigation was not fair to the applicants.

Ground 1 – The DG could not have reasonably reached his conclusion without hearing the applicants' witnesses

The applicants had adduced several key witnesses who testified that the goods had indeed been exported based on their accounts of the various stages of the export. The testimonies made by the witnesses ranged from those affirming that they had witnessed the goods being loaded onto the vessel and being transferred onto a separate vessel on Singapore high waters to the buyers confirming that they had indeed received the exported goods and had made payments for the goods.[33]

The witnesses' testimonies had the possible effect of proving the export of the goods, which would have contradicted the findings of fact that had been made by the DG in his investigation.[34] It was thus necessary for the DG to have investigated the claims made by the applicants' witnesses to reach a reasonable conclusion.[35]

Hence, by not investigating the claims made by the applicants, the DG could not have reasonably come to the decision made by him due to the presence of plausible contradictory evidence.

Ground 2 – The DG misdirected himself on the nature of evidence required under reg 12(6) to prove the export of the goods

Although the DG had based his decision on evidence, he had misdirected himself as to the "nature and effect" of the evidence required to prove the export of the goods.[36] While the DG had *prima facie* evidence to show that the goods had not been exported, the applicants had submitted their own evidence to rebut this finding. The nature and effect of the evidence produced was to nullify the factual basis upon which the DG made his decision. It was sufficient that the applicants' evidence had such an effect, and the DG, in failing to recognise this, while placing undue weight on his own evidence,[37] had misdirected himself as to the nature and effect of the evidence required to prove the export of the goods.[38]

Ground 3 – The DG failed to take into account relevant considerations before arriving at his decision due to the insufficient inquiry

In total, nine affidavits were submitted by the applicants to substantiate their claims that the goods had indeed been exported.[39] State counsel submitted that the evidence which were provided after December 1988 (when the application for an order of prohibition was taken out by the applicants) could not be taken into consideration. While Chan J doubted the validity of such a submission, he nevertheless proceeded to assess the affidavits based on the limitation that evidence submitted after December 1988 was not to be reviewed. [40] The applicable evidence thus constituted two statements: the statement made by the applicants that they had arranged shipment of the goods directly with the shipowner (which explains why the agents of the vessel testified that they were not aware of any loading of goods onto the vessel), and the statement made by TKM, accompanied with copies of invoices that showed that he had received the goods and had paid for them. Such evidence could have proved the export of the goods and was in direct conflict with the affidavits submitted by the DG.[41] There was thus a serious dispute as to whether the goods were in fact exported.

While Chan J did not seek to make a judgment as to whether the applicants' evidence or the DG's evidence was to be believed, the DG had to thoroughly review the evidence produced by the applicants.[42] Although the DG could have preferred the evidence which would have proven non-export, the lack of investigation of evidence which could have proven otherwise was fatal to the DG's case.[43] By not investigating the contradictory evidence, the DG could not be said to have taken "reasonable steps to acquaint himself with the relevant information to enable him to answer [the question on whether the goods were exported]".[44] Hence, the DG failed to take into account relevant considerations since he did not investigate the relevant evidence put forth by the applicants.[45]

Thus, applying the law as stated by Lord Diplock in *Tameside*, in making an insufficient inquiry, the DG failed to take into account relevant considerations before arriving at his decision.[46]

Ground 4 – The investigation was not fair to the applicants

The investigation was deemed to have been unfair to the applicants[47] as the DG, in making his decision, preferred the evidence offered to him by Kusmawanto (an ordinary crew member) and PL from TTS, without first fully investigating the evidence adduced by the applicants and their witnesses. If the DG had done so, the evidence submitted by the applicants could have been sufficient to prove that the goods had indeed been exported.[48]

Error as to precedent fact

Chan J mentioned *obiter* that whether dutiable goods removed for export are illegally landed or whether such goods have been exported are questions of fact. Further, it must be proven by evidence whether a particular fact exists.[49] Hence, reg 12(6) is a regulation that requires the establishment of a "precedent fact".[50] It was insufficient that the DG believed or opined that the goods had not been exported (no matter how reasonable the belief was), but rather, it was a fact that had to be objectively ascertained. The applicants can only be liable to pay the customs duty levied on the goods after this fact has been established.[51]

Further, Chan J, in relying on the English case of *Khawaja v Secretary of State for the Home Department* (1984) ("*Khawaja*"),[52] opined that in cases of this nature, the court's role was not to look at whether the decision-maker could have made a reasonable decision, but to decide whether the decision made could have been justified by the evidence present.[53]

That said, as the applicants did not bring the application on the grounds of error as to precedent fact, Chan J did not base his decision on this ground.[54]

Conclusion

In summary, the DG failed to make a sufficient inquiry and hence did not take into account the relevant evidence put forth by the applicants, which could have been capable of rebutting the *prima facie* evidence of non-export which the DG originally had.[55] Without making the necessary investigation into the claims made by the applicant's witnesses, the DG thus could not have reasonably come to his conclusion. This had the effect of making the investigation unfair towards the applicants.[56] All these grounds provided the basis for Chan J's decision that the DG's decision was made on an incorrect basis of fact and hence an order of prohibition was granted.

Commentary

Incorrect basis of fact (error as to material fact) as a separate ground of judicial review in other jurisdictions

Traditionally, the courts have been reluctant to interfere in alleged errors of fact, mainly because the courts' role in judicial review of administrative actions is to examine the legality and not the merits of the decisions of public authorities.[57] However, errors of fact can cause injustice and unfariness to the individuals involved.[58] In light of this, judges have suggested, albeit *obiter*,[59] that the courts' "supervisory jurisdiction over question of fact might be broader than the traditional approach indicates."[60]

The case of *Tameside* is widely accepted as being the first case which suggests a novel approach to factual error.[61] There, the courts asserted that administrative decisions may be reviewed if there was 'misunderstanding or ignorance of an established and relevant fact' and/or 'the minister has act outside his power, or unfairly, or upon an incorrect basis of fact'.[62] That is to say, even if it is for the decision-maker to evaluate the facts, the court can inquire into whether those facts exist and have been taken into account, whether the decision was made on a proper self-direction as to those facts, and whether irrelevant facts have been taken into account.[63] The courts' power in the branch of judicial review was broadened to allow limited factual inquiry. This ground of judicial review has subsequently been termed as an error of material fact.[64] [65]

After the decision in *Tameside*, several jurisdictions such as UK, New Zealand, South Africa and Australia have followed it to conclusively recognise error of material fact as a ground for review. These jurisdictions have categorised an error of material fact as an error of law and qualified that the error must have been material to the outcome of that particular case.

UK

In the UK, the law has developed to a point where "it is now possible to say that material error of fact leading to unfairness constitutes a discrete ground for judicial review."[66] In *E v Secretary of State for the Home Department* (2004) ("*E v Secretary*"),[67] Carnwath LJ asserted that "the time has now come to accept that a mistake of fact giving rise to unfairness is a separate head of challenge in an appeal on a point of law."[68] To succeed in such a challenge, four essential requirements must be met:

1) there must have been a mistake as to an existing fact, including a mistake as to the availability of evidence on a particular matter;

2) the fact or evidence must have been "established", in the sense that it was uncontentious and objectively verifiable;

3) the appellant (or his advisers) must not been have been responsible for the mistake;

4) the mistake must have played a material (not necessarily decisive) part in the tribunal's reasoning.[69]

Australia

In Australia, common law grounds of judicial review are codified under the Administrative Decisions (Judicial Review) Act 1977 (“ADJR”). Findings of fact may also be reviewed for errors of law under sections 5(1)(f)[70] and 6(1)(f) [71] of the ADJR, provided the error is material to the decision. Hence, error as to material fact as a ground of judicial review is recognised in Australia by virtue of statute, and has been classified as an error of law.[72] Error as to material fact is thus seen as a separate ground of judicial review in Australia.

New Zealand

In New Zealand, judicial review of an error of material fact falls under a pre-existing ground of review, i.e. relevant and irrelevant considerations, rather than a separate cause of action. However, as in the UK, there is a requirement that the error must have been material. In *Attorney-General v Moroney* (2001),[73] the courts confirmed that "in order to make out the ground, the error must be sufficiently material to be described as the basis or the probable basis of the decision."[74] Similar to the UK, this ground of judicial review is classified as an error of law.[75]

Applicability of the ground of error as to material fact in Singapore

The Singapore High Court in *Re Fong Ting Choo* cited and applied the approach to factual error[76] adumbrated by Scarman LJ in *Tameside*. Thus, it has been accepted that there are grounds where the courts in Singapore may review errors of fact when there has been a misunderstanding or ignorance of an established and relevant fact.[77] In other words, an error of material fact may be amenable to judicial review.

However, there is still no certainty as to how judges would apply their powers of judicial review when a material error of fact has been committed. The case of *Re Fong Thin Choo* was decided in 1991, prior to the newly enunciated requirements in *E v Secretary*. Hence, it still remains to be seen if the courts in Singapore will adopt the stance in the UK, namely, the four requirements that were laid down in *E v Secretary*.[78] . There appears however to be little reason that the courts in Singapore will reject these requirements, given that *Tameside* was approved of locally, and *E v Secretary* was a case which was based upon *Tameside*.[79] The fact that this ground of judicial review is now commonly classified as an error of law[80] will also be in keeping with Singapore’s position on justiciability: that only errors of law are judicially reviewable.[81]

However, the criticism of such an approach is that "it might undermine the important principle of finality."[82] Moreover, the fear of floodgates could be another pressing concern. These worries were expressed by the courts in *Shaheen v Secretary of State for the Home Department* (2005)[83] and in *MT (Algeria) v Secretary of State for the Home Department* (2007) ("*MT (Algeria)*").[84] In *MT (Algeria)*, the court went so far as to warn against embracing a new ground for review to as this had the effect of "turn[ing] what is a simple error of fact into an error of law by asserting some new fact which is itself contentious."[85] All these worries point to the need for a stringent test to be set out and applied, should error of material fact emerge as a new ground of judicial review.[86]

Such a stringent test however is already available in the form of the four "burdensome"[87] requirements laid down in *E v Secretary*. Not only are the four requirements difficult to establish[88] (which would allay the concerns about floodgates and the principle of finality), they also provide a guiding framework as to what merits a review based on an error of material fact.

Another consideration is whether the courts in Singapore will adopt error as to material fact as a standalone ground of judicial review, as was done in the UK, or if they will they adopt a position similar to that in New Zealand, where an error of material fact is subsumed under an existing ground of judicial review such as that of failing to take into account relevant considerations or taking into account irrelevant considerations.

It remains to be seen what approach the Singapore court will adopt but be that as it may, the practical outcome of the two approaches will be the same: when a decision maker has made an error as to a material fact when reaching a decision, this decision will be subject to review by the courts.

Notes

[1] "Error of material fact", Leyland, Peter; Anthony, Gordon (2009), "Illegality II", *Textbook on Administrative Law* (6th ed.), Oxford; New York, N.Y.: Oxford University Press, pp. 276-277, ISBN 978-0-19-921776-2 (pbk.)
[2] *Re Fong Thin Choo* [1991] 1 S.L.R.(R) 774 at 777, para. 3.
[3] *Re Fong Thin Choo*, p. 777, para. 4.
[4] *Re Fong Thin Choo*, p. 777, para. 5.
[5] *Re Fong Thin Choo*, p. 777, para. 6.
[6] *Re Fong Thin Choo*, pp. 778, para. 8.
[7] *Re Fong Thin Choo*, pp. 779-780, para. 11.
[8] Government Proceedings Act (Cap. 121, 1985 Rev. Ed. (http://statutes.agc.gov.sg/non_version/cgi-bin/cgi_retrieve.pl?actno=REVED-121)) ("GPA"), s. 27.
[9] *Re Fong Thin Choo*, p. 780, para. 12.
[10] Customs Regulations 1979 (GN No S 261/1979) reg 12(6).
[11] *Re Fong Thin Choo*, p. 781, paras. 15-16.
[12] *Re Fong Thin Choo*, p. 792, para, 54.
[13] GPA, s. 27.
[14] *Re Fong Thin Choo*, p. 781, para. 15.
[15] *Re Fong Thin Choo*, pp. 781-782, para. 17.
[16] *R v Criminal Injuries Compensation Board, ex parte Lain* [1967] 2 QB 864.
[17] *Re Fong Thin Choo*, pp. 781-782, para. 17.
[18] *Re Fong Thin Choo*, p. 782, para. 18.
[19] *Re Fong Thin Choo*, p. 787, para. 35.
[20] *Secretary of State for Education and Science v Tameside Metropolitan Borough Council* [1977] AC 1014.
[21] *Tameside*, p. 1074, para. 1047D.
[22] *Tameside*, p. 1074, paras. 1047D-1047E.
[23] *Tameside*, p. 1074, para. 1047E.
[24] *Tameside*, p. 1074, para. 1047G.
[25] *Tameside*, p. 1065, para. 1065A.
[26] Customs Regulations 1979 (GN No S 261/1979) reg 12(6).
[27] Customs Regulations 1979, reg 12(6).
[28] *Re Fong Thin Choo*, p. 785, para. 29.
[29] *Re Fong Thin Choo*, pp. 786-787, para. 33.
[30] *Re Fong Thin Choo*, p. 794, para. 58.
[31] *Re Fong Thin Choo*, p. 793, para. 57.

[32] Customs Regulations 1979, reg 12(6).
[33] *Re Fong Thin Choo*, pp. 788-789, paras. 37-44.
[34] *Re Fong Thin Choo*, pp. 790-791, para. 51.
[35] *Re Fong Thin Choo*, p. 792, para. 54.
[36] *Re Fong Thin Choo*, p. 792, para. 54.
[37] *Re Fong Thin Choo*, p. 792, para. 53.
[38] *Re Fong Thin Choo*, p. 792, para. 54.
[39] *Re Fong Thin Choo*, pp. 788-789, paras. 37-45.
[40] *Re Fong Thin Choo*, p. 790, para. 50.
[41] *Re Fong Thin Choo*, pp. 790-791, para. 51.
[42] *Re Fong Thin Choo*, p. 792, para. 53.
[43] *Re Fong Thin Choo*, pp. 790-792, paras. 51-52.
[44] *Tameside*, p. 1065, 1065A.
[45] *Re Fong Thin Choo*, p. 793, para 57.
[46] *Re Fong Thin Choo*, p. 792, para. 53.
[47] *Re Fong Thin Choo*, p. 792, para. 53.
[48] *Re Fong Thin Choo*, pp. 791-792, para. 52.
[49] *Re Fong Thin Choo*, p. 786, para. 32.
[50] *Re Fong Thin Choo*, pp. 786-787, para. 33.
[51] *Re Fong Thin Choo*, p. 786, para. 32.
[52] *Khawaja v Secretary of State for the Home Department* [1984] 1 AC 74
[53] *Re Fong Thin Choo*, pp. 786-787, para. 33.
[54] *Re Fong Thin Choo*, p. 787, para. 35.
[55] *Re Fong Thin Choo*, p. 792, paras. 53-54.
[56] *Re Fong Thin Choo*, p. 793, para. 57.
[57] "Review and Appeal", Barnett, Hilarie (2004), "Chapter 26: Judicial Review: Introduction, Jurisdiction and Procedure", *Constitutional & Administrative Law* (5th ed.), Great Britain: Cavedish Publishing Limited, p. 712, ISBN 1-85941-927-5 (pbk.)
[58] "The Final Frontier: The Emergence of Material Error of Fact as a Ground for Judicial Review", Forsyth, Christopher; Dring, Emma (2010), "Chapter 5", *Effective Judicial Review - A Cornerstone of Good Governance* (1st ed.), New York, N.Y.: Oxford University Press, p. 246, ISBN 978-0-19-958105-4 (hbk.)
[59] *Secretary of State for Employment v ALSEF (No 20)* [1972] 2 QB 455, p. 493.
[60] Forsyth & Dring, p. 250
[61] Forsyth & Dring, p.250
[62] *Tameside*, p. 1030, para. 1030E.
[63] *Tameside*, p. 1047, para. 1047D.
[64] Leyland & Anthony, pp. 276-277.
[65] Barnett, p. 712.
[66] Forsyth & Dring, p. 250
[67] *E v Secretary of State for the Home Department* [2004] QB 1044.
[68] *E v Secretary*, p. 1071, para. 66.
[69] *E v Secretary*, p. 1071, paras. 66-67.
[70] Administrative Decisions (Judicial Review) Act (1977), s. 5(1)(f).
[71] ADJR, s. 6(1)(f).
[72] Halsbury's Laws of Australia, Vol 13 (at 29 September 2011), para. [205-425].
[73] *Attorney-General v Moroney* [2001] 2 NZLR 652.
[74] *Attorney-General v Moroney*, p. 699, para. 81.
[75] per Elias CJ in *Lewis v Wilson & Horton Limited* [2000] 3 NZLR 546 at 598, para. 73.
[76] *Re Fong Thin Choo*, pp. 786-787, para. 33.
[77] *Tameside*, p. 1030, para. 1030E.
[78] *E v Secretary*, p. 1071, paras. 66-67.
[79] *E v Secretary*, p. 1067, para. 54.
[80] Forsyth & Dring, p. 250.
[81] *Stansfield Business International Pte Ltd v Minister of Manpower* [1999] 2 SLR(R) 866.
[82] Forsyth & Dring, p. 250.
[83] *Shaheen v Secretary of State for the Home Department* [2005] EWCA Civ 1294.
[84] *MT (Algeria) v Secretary of State for the Home Department* [2007] EWCA Civ 808.
[85] *MT (Algeria)*, p. 1213, para. 69.
[86] Forsyth & Dring, p. 250.
[87] Forsyth & Dring, p. 250.

[88] Forsyth & Dring, p. 250.

External links

- British and Irish Legal Information Institute (http://www.bailii.org/)
- Commonwealth of Australia Consolidated Acts (http://www.austlii.edu.au/au/legis/cth/consol_act/)
- Singapore Statutes Online (http://statutes.agc.gov.sg)

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