

# HFW



## HONG KONG AEROSPACE BULLETIN MARCH 2019



### **Aviation developments in and around Hong Kong**

HFW's full-service aviation team in Hong Kong is uniquely placed to provide insight across the full spectrum of developments in the aviation industry.

In this, the first of a series of briefings, we look at both recent and forthcoming aviation developments in and around Hong Kong. In particular, we examine the steps Hong Kong is taking to maintain its position as a leading international aviation hub in the face of strong regional competition.

**“What is not in any doubt is that China will soon displace the US as the world’s largest aviation market (forecast to occur around 2022, depending on economic growth).”**

## **CLEARED FOR TAKE OFF: CHINA’S CIVIL AVIATION AMBITIONS**

On 10 December 2018, the Civil Aviation Administration of China (CAAC) published an over-arching action plan aimed at transforming China into an aviation powerhouse by 2050.

While the initial focus is to address shortfalls in areas such as infrastructure and airspace capacity, from 2020 the ambition is for China to become a global leader in air transport. In order to build internationally competitive airlines, the CAAC says that it will encourage re-organisation of carriers, strategic co-operation, and mergers and acquisitions. It will also support the development of low-cost carriers, as well as regional and cargo airlines.

Of particular note, China is almost aiming to double the number of airports, from 234 airports at present to a target of 450 airports by 2035. As part of that, attention will be focused on raising the competitiveness of Beijing, Guangzhou and Shanghai as international hubs.

As far as Beijing is concerned, the new Beijing Daxing International Airport (around 50km south of the city centre) is scheduled to open on 30 September this year, initially operating four runways, and eventually up to seven runways. The airport will be able to serve 72 million passengers per year by 2025, and ultimately up to 100 million passengers per year. Relocation of carriers to Daxing will occur gradually from 2019 to 2021, with China Southern Airlines and China Eastern Airlines due to become anchor carriers at Daxing. Air China and Hainan Airlines, amongst others, are due to remain at the existing Beijing Capital International Airport. As far as foreign carriers are concerned (including those from Hong Kong and Macau), the CAAC has said that they can choose whether to operate from one or both Beijing airports.

Although the CAAC’s action plan has to be read against the backdrop of a slowing Chinese economy, China’s intent and ambition is clear. The fact that civil aviation has been

designated as a “strategic industry playing a primary and leading role” in China’s economic development means that it would be unwise to bet against China ultimately reaching its stated objectives.

What is not in any doubt is that China will soon displace the US as the world’s largest aviation market (forecast to occur around 2022, depending on economic growth). The International Air Transport Association (IATA) predicts that China will serve 1.5 billion passengers per year by 2036, which is consistent with Boeing’s recent forecast that China will need 7,690 new aircraft over the next 20 years. It is therefore no surprise that in our experience, aircraft finance and leasing activity in the region remains high and, subject perhaps to one or two economic bumps in the road, we expect that it will likely remain so.

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## **BAY WATCH: AVIATION AROUND CHINA’S “GREATER BAY AREA”**

**First mentioned in 2015, and with a Framework Agreement signed the following year, the “Greater Bay Area” is the Chinese Government’s ambitious scheme to link into an integrated economic and business hub the cities of Hong Kong, Macau, Guangzhou, Shenzhen, Zhuhai and 6 other cities in Guangdong Province around Southern China’s Pearl River Delta.**

The Greater Bay Area plan (apparently devised, planned and driven by the Chinese President Xi Jinping) plays a significant strategic role in the overall economic development of China. Its aim is to create a centre for innovation and economic growth through the flow of people, goods, capital and information, to rival the Bay Areas of San Francisco, New York and Tokyo.

While there appears to be no doubting the Chinese political will to progress this project, it faces considerable challenges nonetheless, including the differing tax regimes, currencies, and legal and political systems which exist across Hong Kong, Macau and the other Guangdong cities.

On 18 February 2019, an Outline Development Plan for the Greater Bay Area was published, comprising eleven chapters. As far as aviation is concerned, the objectives are as follows:

- To consolidate and enhance Hong Kong's status as an international aviation hub, raise the competitiveness of Guangzhou and Shenzhen airports as international hubs, strengthen the functions of airports such as those in Macau and Zhuhai, and pursue differential development and positive interaction of airports in the Greater Bay Area.
- To support the construction of Hong Kong Airport's third runway, as well as the reconstruction and expansion of Macau's airport, commence a preliminary study for the construction of a new airport in Guangzhou, and study the development of a batch of feeder airports and general aviation airports.
- To further expand the Greater Bay Area's domestic and international aviation networks, and proactively take forward inter-modal code sharing service.
- To leverage Hong Kong's strengths in financial and logistics services, and develop high value-added freight, aircraft leasing and aviation financing services.
- To support Macau airport in developing regional business aircraft services.
- To strengthen airspace coordination and air traffic management collaboration, optimise airspace structure, enhance the efficiency of the utilisation of airspace resources, and enhance air traffic management capacity.
- To deepen management reform in low-altitude airspace, expedite the development of general aviation, steadily develop cross-boundary helicopter services, and set up general aviation demonstration zones in Shenzhen and Zhuhai.
- To proceed with the setting up of airport economy zones in Guangzhou and Shenzhen.

Three months prior to the publication of the Outline Development Plan, and in support of the Chinese Government's vision for a Greater Bay Area, the Civil Aviation Administration of China (CAAC) and the Guangdong Provincial Government signed a Strategic Agreement on 5 November 2018 to accelerate construction of a group of world-class airports in the Greater Bay Area. The impact on Hong Kong will largely depend on whether the emphasis is on cooperation (as is proposed) or whether, in reality, competitive pressures and regional rivalries prevail. Unsurprisingly, that Strategic Agreement was consistent with the subsequent Outline Development Plan. It stated that:

- The CAAC will proactively support and help Guangdong to formulate a development plan for a world-class airport group in the Greater Bay Area, in a bid to build, in conjunction with Hong Kong and Macau, an integrated airport cluster characterised by shared resources and coordinated development.
- The layout and structure of the airspace for both civil and military airports in the Pearl River Delta region will be adjusted, in order to optimise it.
- Attention will be focused on enhancing the competitiveness of Guangzhou and Shenzhen airports as international aviation hubs. In particular, the infrastructure of Guangzhou airport will be improved, and efforts will be made to actively expand the route networks at both airports in order to build internationally competitive transfer hubs.
- Efforts will be made to further deepen civil aviation cooperation between Guangdong, Hong Kong and Macau. This includes cooperation in airport operation, management and facilities; logistics; aircraft maintenance; and general aviation.
- Strong support for the development of general aviation industry in Guangdong. This includes setting aside areas for general aviation in the newly built, reconstructed and expanded hub

and feeder airports; establishing fixed base operators at selected airports; developing plans to establish general aviation airports in Guangzhou, Foshan, Dongguan, Jiangmen, Zhaoqing and other cities; and accelerating the construction of an aviation industry park in Zhuhai.

Much of the Outline Development Plan is vague, although the aim is to have a framework in place by 2022 for the development objectives. What is clear, however, is that if the Greater Bay Area vision is to be realised, there has to be a very significant degree of cooperation, coordination and connectivity between Hong Kong, Macau and the 9 other cities.

The scale and potential impact of the Greater Bay Area is hard to ignore, not least due to the estimated future passenger traffic and volume of freight. Currently consisting of around 70 million people, one forecast by HSBC expects the region's current gross domestic product of US\$1.5 trillion to nearly double to US\$2.8 trillion by 2025 (making it the 9th largest economy in the world). In 2017, airports in the Greater Bay Area handled 202 million passengers, with that figure forecast to grow by nearly 85% to 371 million passengers by 2030.

Given the anticipated regional growth, Hong Kong International Airport is endeavouring to preserve its position as a leading international hub, by encouraging intermodal ticketing and upstream check-in, where passengers check in for their flight in the Greater Bay Area, before boarding a ferry or taking a coach to the airport in Hong Kong. These intermodal arrangements were boosted by a Memorandum of Understanding signed on 19 February 2019 between Hong Kong and the CAAC, which expanded the existing airline code-share arrangements for land and sea transport between the Chinese Mainland and Hong Kong. Hong Kong Airport is also aiming to tap into the substantial e-commerce development around the Greater Bay Area, with intermodal cargo facilities for transshipments both by air-sea (via the Pearl River Delta) and air-road (via the newly opened Hong Kong-Macau-Zhuhai Bridge).

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As part of the regional cooperation, the work of the Pearl River Delta Region Air Traffic Management Planning and Implementation Tripartite Working Group has also continued. It comprises the CAAC, Hong Kong’s Civil Aviation Department, and the Civil Aviation Authority of Macau. The main aim of that Working Group is to optimise airspace and air traffic management in the Greater Bay Area given the number of major airports in the region. In particular, it aims to reduce flight delays along the east coast of China, which have historically been bad owing to military aviation activities (as the large majority of China’s airspace is controlled by the military). The position is however improving, in part due to the recent opening of an additional flight route between Hong Kong and Shanghai. Recent figures for 2018 showed that more than two thirds of flights departed on time from Hong Kong to Shanghai, compared with less than half of those flights doing so the previous year.

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## **GRAND DESIGNS: HONG KONG INTERNATIONAL AIRPORT’S THIRD RUNWAY**

In order to meet the growing air traffic demand and so maintain Hong Kong’s competitiveness as an international aviation hub (with half of the world’s population reportedly within 5 hours’ flying time), work is continuing on the construction of a third runway at Hong Kong International Airport. **Hong Kong remains the world’s busiest airport for cargo, as well as one of the world’s busiest airports for passenger traffic.**

The significant expansion project commenced in 2016, and has involved the reclamation of around 650 hectares of land from the sea. The project has been compared in scale to almost building a new airport next to the existing one. It is an ambitious project: besides the new 3.8 kilometre runway and more than 15 kilometres of associated taxiways, it will also involve construction of a new air traffic control tower and a new passenger terminal with 57 aircraft parking positions, and will be connected to the existing

terminals by an automated people mover system and a new baggage handling system. The project also involves expanding the existing Terminal 2, work on which has already commenced.

The construction is set to cost around US\$18 billion, of which nearly 20% is being funded by an Airport Construction Fee levied on airline tickets issued on or after 1 August 2016 for all passengers departing from Hong Kong. The levy is due to remain in place until all borrowings relating to the construction of the third runway have been fully repaid.

The new third runway is scheduled to enter service in 2022, at which time the existing North runway will be closed for repairs and re-configuration. All three runways are due to be in operation by the end of 2024 (although given the current capacity constraints at the airport there is pressure for that date to be brought forward). Traffic of 100 million passengers is targeted by 2024, and with strong passenger growth forecast it is perhaps not surprising that the possibility of a fourth runway has already been mooted.

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## **CHILL OUT – HONG KONG’S AIR CARGO INITIATIVES**

In view of the rising terrorism threat around the world, in September 2016 the International Civil Aviation Organization (ICAO) announced a new policy to enhance international standards on air cargo security.

Under this policy, by 30 June 2021 all consignors will have to either:

- be approved by the appropriate authority as a validated “Known Consignor”, or
- become an “unknown consignor” with all cargo subject to 100% security screening prior to being loaded onto a commercial aircraft.

At present, security screening of air cargo in Hong Kong primarily takes place at the cargo terminals at the airport. In anticipation of an upsurge in screening demand, and in order to avoid an adverse impact on the air cargo industry in Hong Kong, at the end of October 2018 the Government launched a new scheme to enable

and regulate cargo screening in off-airport locations. Under the scheme, industry operators such as freight forwarders and shared warehouse operators will be able to conduct cargo screening operations in their premises by registering with Hong Kong's Civil Aviation Department to become Regulated Air Cargo Screening Facilities. Such facilities would have to satisfy a number of requirements, including having suitable x-ray machines, as well as a secure means of transporting the cargo from the warehouse to the airport's cargo terminals in order to protect the screened cargo from unlawful interference.

A validation scheme for Known Consignors in Hong Kong is also being formulated, with a targeted roll out during the first Quarter of 2019. Consignors who have not been approved by the Civil Aviation Department will become "unknown consignors" from 1 July 2021, with all of their air cargo being security screened prior to being loaded onboard aircraft.

In another related development, plans are underway to develop a premium logistics centre to the south of Hong Kong Airport, with an estimated floor area of 380,000 square metres (making it the third largest warehouse in Hong Kong). A joint venture, led by Cainiao Network (the logistics arm of Alibaba Group), will design, construct, finance and manage the logistics centre, which is scheduled to commence operation in 2023. The centre aims to capture trans-shipment and cross-boundary opportunities arising from the fast-growing global e-commerce business, as well as growth in the transport of temperature-controlled products such as pharmaceuticals.

In a separate initiative, Hong Kong Airport and Brussels Airport (Europe's principal air cargo hub for handling pharmaceutical shipments) have launched an airport-to-airport corridor for temperature-sensitive medicines. Pharma shipments transported between Hong Kong and Brussels will be handled in strict compliance with the CEIV Pharma standards and carried by CEIV Pharma-certified airlines. Although Hong Kong Airport's objective is to make it a preferred pharmaceutical

transshipment hub, the broader initiative by Pharma.Aero (a cross-cargo industry collaboration) is to pioneer a global network of specialist pharma corridors.

As part of the new service, Hong Kong Airport is adding 19 temperature-controlled cool dollies to its ground fleet for the ramp transfer of pharma goods by airlines, with the aim of giving all airlines access to cool dollies for their temperature-sensitive shipments. In addition, the Airport is also building apron shelters to protect pharma shipments from direct exposure to the weather.

In our experience, temperature deviations for temperature-sensitive pharmaceutical products (for example as a result of cargo being left on the apron in the sun for prolonged periods) can lead to significant claims. It will therefore be interesting to see whether this new initiative helps to reduce the number of claims faced by airlines and their insurers.

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## **BRACE, BRACE, BRACE! HONG KONG'S NEW AIR ACCIDENT INVESTIGATION AUTHORITY**

**On 10 September 2018 a new Air Accident Investigation Authority (AAIA) was established in Hong Kong, headed by a new Chief Inspector of Accidents Darren Straker, formerly the Chief Air Accident Investigator of the United Arab Emirates.**

Previously, air accident investigations in Hong Kong were carried out by the Civil Aviation Department (CAD), which was also responsible for both aviation regulation and air traffic services. As a result, there was a concern about the CAD's lack of independence, given the potential for conflict of interest when conducting investigations. The need for impartiality was a global challenge, which led the International Civil Aviation Organisation (ICAO) to require all Contracting States to establish independent air accident investigation authorities by November 2018. The establishment of Hong Kong's new AAIA meets that requirement.

In order to provide the AAIA and the Chief Inspector with the necessary statutory powers, amendments to the existing legislation were made<sup>1</sup>, which came into force on 3 December 2018. The new AAIA is independent from the CAD, and forms part of the Transport and Housing Bureau, with the Chief Inspector reporting to Hong Kong's Secretary for Transport.

Changes to the legislation have been made in order to align it with the international standards set out in Annex 13 to the Convention on International Civil Aviation, which addresses aircraft accident and incident investigation. The main changes comprise the following:

- Replacing the previous definitions of "accident" and "reportable accident" with the definitions of "accident" and "serious incident" set out in Annex 13;
- Updating the definition of "serious injury" to include exposure to infectious substances or radiation;
- Empowering the Chief Investigator to investigate incidents which are not serious if safety lessons can be drawn; and
- Amending the information required to be given in notifications of accidents and serious incidents to the Chief Inspector. For example, the nationality of crew and passengers (if available), the manufacturer and serial number of the aircraft, and a description of any dangerous goods on board the aircraft are all now required.

These changes are welcome, but further legislation is still required in order to shield from further disclosure information obtained by the AAIA during the course of an investigation, such as interview statements and cockpit voice recordings (as required by chapter 5.12 of Annex 13). Without such protection, this information could be used inappropriately for subsequent disciplinary, civil or criminal proceedings.

<sup>1</sup> Principally by the Hong Kong Civil Aviation (Investigation of Accidents) (Amendment) Regulation 2017, which amended the Hong Kong Civil Aviation (Investigation of Accidents) Regulations

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Additional legislation to address these issues was due to be put forward in the Hong Kong Government’s 2018-19 legislative session. That now appears unlikely, as no such legislation forms part of the Government’s transport policy agenda for the forthcoming year, and nor has it been scheduled for discussion by the Government’s Transport Panel. In the interim, the Government has somewhat vaguely said that the relevant protection will be provided by “administrative means”.

The AAIA comprises six accident investigators in addition to the Chief Investigator. The aim is to speed up investigations, make safety recommendations, and pursue accident prevention initiatives. As is to be expected given its location at an important international aviation hub, the AAIA’s facility comprises a command centre, a flight data recorder download and playback centre, a secure evidence hangar, and adjoining interview rooms. It is also equipped with a range of underwater locator beacon detectors, in case of ditching or runway overrun, given Hong Kong airport’s island location.

Although the AAIA has only been in existence for six months or so, it has already published three preliminary reports in relation to investigations commenced during that period. In addition, it has also taken over the investigations previously initiated by the CAD.

It has been a busy start for the AAIA. Based on our own experience to date, it has been encouraging to note that, where necessary, the AAIA is willing to exert its independence, by investigating the activities of the CAD and commenting as appropriate.

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## **WHEN TOUR GROUPS AND SHOPPING TURN NASTY: HONG KONG BAGS NEW LEGISLATION**

**For many years there have been concerns in Hong Kong about the conduct of organised tour groups, particularly from Mainland China, including those which were subject to coerced shopping, leading to a number of reported incidents and in some cases injuries and death.**

This was seen as tarnishing the image and reputation of Hong Kong’s travel industry, and indeed questions were raised as to whether this might even harm relations between Hong Kong and Beijing.

On 29 November 2018 the Hong Kong Government passed new legislation, the Travel Industry Ordinance (“the Ordinance”), in order to improve the regulation of travel agents, tour guides, and tour escorts. The Ordinance also establishes a new Travel Industry Authority. A commencement date for the Ordinance has yet to be announced.

The new legislation has been a long time in the making – as long ago as December 2011, the Government announced that an independent statutory body would be set up in order to provide greater regulation for the travel industry in Hong Kong.

Currently there are two regulatory authorities for the travel industry in Hong Kong:

- The Travel Industry Council of Hong Kong is responsible for trade self-regulation (covering travel agents, tour guides and tour escorts) through codes of conduct and directives, and for taking disciplinary measures; and
- The Travel Agents Registry, under the Tourism Commission, is responsible for licensing travel agents under the Travel Agents Ordinance.

The Travel Industry Authority, once established, will take over the functions of both the Travel Industry Council and the Travel Agents Registry.

The Ordinance is intended to provide a comprehensive licensing and regulatory system for travel agents, tour guides and tour escorts, with the objective being to enhance the professionalism of the Hong Kong travel industry. It expressly provides that airlines are not “travel agents” simply by providing the means of carriage from or to Hong Kong. In addition, a company will not be carrying on business as a travel agent if, in the discretion of the Travel Industry Authority, the relevant business activities are ancillary to the company’s principal business.

The aim is therefore to capture individuals and businesses whose primary function is to organise travel, accommodation, sightseeing and other activities, including shopping. The licensing of on-line travel agents, which have become increasingly popular in Hong Kong's outbound tourism market, also falls within the scope of the Ordinance.

Carrying on business as a travel agent without a licence is subject to a fine or imprisonment under the Ordinance. The Travel Industry Authority is empowered to impose licence conditions on travel agents (one purpose of which is to prevent coerced shopping), a breach of which is subject to criminal penalties and/or disciplinary proceedings.

The Travel Industry Authority will also assume responsibility for the existing Travel Industry Compensation Fund, which currently provides outbound travellers from Hong Kong with ex gratia payments to compensate them for any loss of outbound fares. The fund also reimburses certain expenses if accidental injury or death occurs in the course of the activities organised by Hong Kong travel agents.

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## UNMANNED AERIAL SYSTEMS IN HONG KONG'S CROWDED SKIES

**Unmanned Aerial Systems (UAS) or 'drone' operations are currently attracting considerable regulatory focus as well as public attention, in light of well publicised events such as the forced closure of London's Gatwick Airport in December owing to reported drone activities. There have also been a number of near misses between drones and aircraft in flight.**

In reaction to the events in London, questions have been raised about whether a similar shutdown of Hong Kong's Airport could arise due to drone operations. Whilst the Airport is equipped with certain drone detection systems, and some drone manufacturers include geo-fencing software in their products to prevent drone incursion over the restricted area around the Airport, both the Airport Authority and Hong Kong's Civil Aviation Department

(CAD) are examining steps taken by other international airports in order to enhance the Airport's ability to monitor drone activity and to prevent any adverse impact on the airport's operations.

So far there has only been one reported prosecution, in July 2017, for illegal operation of a drone within Hong Kong Airport's restricted area. The offender was subsequently convicted of "*causing or permitting an aircraft to endanger any person or property*" under the Air Navigation (Hong Kong) Order 1995 and was fined HK\$2,000 (c. £200).

As we reported in July 2018 ("Hong Kong Prepares for a Drone Invasion"), the CAD has been reviewing the regulation of drones generally, with a view to accommodating the technological development and the diversified uses of drones.

Following a consultancy study commissioned by the CAD on the regulation of drones, the CAD held a three-month public consultation on potential regulations. Since the consultation exercise ended in July 2018, the CAD has been drawing up detailed proposals for an enhanced regulatory regime, taking into account the recommendations of the consultancy study and the views gathered during the public consultation. The proposals include setting up a registration system, specifying the training requirement for operating different categories of drone, providing drone maps and prescribing insurance requirements.

The CAD's plan is to consult the Hong Kong Government on the legislative proposal in the second quarter of 2019, and to develop a strategic framework of implementation measures for both the short-term (up to 2020) and the medium to long-term (from 2020 onwards). In formulating recommended measures, the CAD intends to take into account not only the feasibility of any potential regulations, but also "priority and resource requirements". Despite that rather unclear wording, we would hope that any new legislation encourages, rather than stifles, the use of drones in Hong Kong, whilst at the same time providing the necessary protections for aircraft, privacy and public safety.

## AND FINALLY...CAN PIGS FLY?

**As the Year of the Pig in the Chinese zodiac gets underway, from an aviation perspective we are reminded of those 'swine flew' cases which have in the past hogged the headlines. Although you might think that pigs and passengers do not mix, pigs have on occasion been known to snuffle around the aircraft cabin.**

One notable example was the 20-stone (130kg) pet pig which occupied three First Class seats on an American Airlines flight from Philadelphia to Seattle in 2000. Its owners had insisted upon the pig accompanying them on the flight, saying that it was a "therapeutic companion pet", and relied on a doctor's note to that effect. Despite attempts to strap the pig in, it reportedly became restless after take-off and began sauntering through the First Class cabin. As the flight landed in Seattle the pig panicked, and at one point charged the cockpit door. Eventually it was lured from a hiding place in the galley with food, and had to be pushed off the aircraft by four cabin crew.

In a more recent example of porcine misbehaviour, in December 2014 a passenger who was accompanied by a large pig was asked to leave a US Airways flight after the pig became disruptive during boarding.

Both of these instances arose in the US, owing to specific US legislation (the US Air Carrier Access Act) which prohibits commercial airlines in the US from discriminating against passengers with disabilities. As a result, service animals and emotional support animals – animals that the passenger claims he or she needs due to an emotional or mental disability – must be allowed in the aircraft cabin, subject to certain exceptions. Accordingly, pigs have appeared on board aircraft, along with peacocks, ducks, turkeys, iguanas and other exotic species. However, passengers travelling with fake emotional support animals is apparently a growing problem, with some people now using this as cover to travel with their pets. Unsurprisingly, therefore, the US Department of Transportation is

looking to tighten up its service animal rules.

Under the US legislation foreign airlines are not required to carry service animals other than dogs, although issues could conceivably arise where a passenger is travelling under a US airline's code on a flight operated by a foreign code-share airline partner.

As far as Hong Kong is concerned, the Civil Aviation Department's regulations only allow guide dogs and specially trained disability assistance dogs to travel in the aircraft cabin, subject to prior approval from the Agriculture, Fisheries and Conservation Department.

And so, to answer the question, yes pigs can (currently) fly in the passenger cabin – but not to Hong Kong.

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