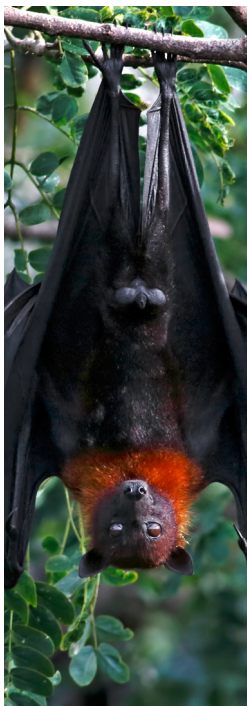


frESH Law Horizons

December 2020



Further COVID-19 Restrictions and Guidance on Enforcement Powers and Notices for Local Authorities.

December brought further changes to the COVID-19 regime in the UK. In England, many areas entered into the new Tier 4 before the festive period, meaning that further categories of business were required to close, including non-essential retail, accommodation (subject to specific exemptions) and leisure/sports facilities. Tier 4 restrictions were expanded across many more areas with effect from midnight on 30 December (with the government [website](#) detailing tiers for all areas). Government [advice](#) in relation to Tier 4 remains that those who can effectively work from home should do so and [COVID-19-secure guidelines](#) should be followed closely in workplaces. This advice will almost certainly continue to apply for sectors continuing to operate (likely to include essential retail, manufacturing and construction) despite the further lockdown announced in January. As we have reported in previous editions of frESH Law Horizons, the Health and Safety Executive (HSE) conducts inspections in relation to COVID-19-secure guidelines, and has [guidance](#) on its own website, including in relation to risk assessments, social distancing, ventilation and air conditioning, communication with workers, working from home and risks to vulnerable workers. The Department of Health and Social Care has also published [guidance](#) on new enforcement notices/local authority enforcement powers introduced, including Coronavirus Improvement Notices, Coronavirus Restrictions Notices and Coronavirus Immediate Restrictions Notices. A fixed penalty notice may also be issued for any business restriction offence.

Court of Appeal Determines If a Building Owner Was an “Employer” Under Health and Safety Laws.

In the case of [Ahmad v Health and Safety Executive \[2020\] EWCA Crim 1635](#), the defence case was that the appellant was not in control for the purposes of the Construction (Design and Management) Regulations 2015 and was not an employer of the men working on-site within the meaning of the HSWA. However, the Court of Appeal agreed that there was no evidence of third-party advisers being in control of the works on-site, and endorsed the directions of the trial judge to the jury. This included a direction that the independent contractor could be an employee and the defendant, who owned the building where construction works were being carried out, their employer (and this was for the jury to resolve). It also included a general direction that the question of whether the appellant was the “employer” within the meaning of HSWA was not definitively determined by ascertaining whether the people working on-site were working under contracts of employment, but depended on “whether, on an examination of all the relevant facts and circumstances, the jury were sure that he was in control of the people working on the site, in the sense that he had the right to tell them what to do, how to do it, when to do it and where to do it. It also depended on whether there was a mutuality of obligations, in the sense that the appellant was obliged to give them work and pay them for doing it, and they were obliged to turn up for work and carry it out.” The case is a reminder that “employer” can be interpreted widely for the purposes of health and safety obligations (and “employer” is not directly defined under the HSWA).

Crown Court Orders Record Fine for Destroying Bat Roost. The Metropolitan Police service has [reported](#) on the decision of Woolwich Crown Court to order Bellway Homes to pay a record fine of £600,000, following a guilty plea for the offence of damaging or destroying a breeding site or resting place for bats (all UK bats are a protected species) at its construction site in Greenwich. An order was also made for payment of costs of over £30,000.



Consultation Published on Ban on Corporate Directors for Corporate Transparency and Registry Reform.

The Department for Business, Energy and Industrial Strategy (BEIS) has published its [consultation](#) on implementing the prohibition on corporate directors under the Small Business, Enterprise and Employment Act 2015. The consultation closes on 3 February 2021. Under the proposals, UK and overseas entities will be subject to the requirements, designed to ensure that all directors are natural persons subject to the Companies House identity verification process. A “principles-based” exception is proposed, whereby a company can be appointed as a director, IF: firstly, all of its directors are, in turn, natural persons; and secondly, those natural person directors are, prior to the corporate director appointment, subject to the Companies House identity verification process. The Consultation also seeks views on extending the proposals to Limited Liability Partnerships and Limited Partnerships.

Fine for Occupational Ill Health (Serious Respiratory Illness). The HSE has [reported](#) on the fine ordered by Liverpool Magistrates’ Court for breach of Section 2(1) of HSWA which imposes a duty on every employer, as far as reasonably practicable, to ensure the health and welfare at work of all of his employees, as well as their safety. Prosecutions for work-related illness are relatively rare, with most HSE prosecutions resulting from an accident in the workplace, perhaps because it is more difficult to identify risks posed by occupational diseases, and with symptoms often not arising for some time. However, in recent years, the HSE has increased its focus on the ‘health’ in ‘health and safety’. In this case, the HSE report indicates that the defendant company had failed to implement industry standard control measures such as Local Exhaust Ventilation, Respiratory Protective Equipment and a management system for metal working fluids.

Surveillance Camera Commissioner issues best practice guidance, *Facing the Camera*, to all police forces in England and Wales.

The guidance document relates to the use of facial recognition technology to locate persons on a watchlist. The provisions of the guidance also apply to the use of surveillance camera systems owned or operated by third party organisations and operators, including those from the private sectors, where such systems are being operated in partnership with, or at the request of the police. The guidance makes clear (at paragraphs 4.72 and 4.73), that third party service providers do not have a legal duty to follow the [Surveillance Camera Code of Practice](#) (“Code”). However, the police should be able to demonstrate that they are acting lawfully, with integrity and are not exploiting live-time facial recognition capabilities ‘by a back door’, in using the biometric capabilities of others for their own purposes. Further, the guidance provides that where the third-party operation of a surveillance camera system is being conducted by a private sector contracted service provider, the police should place a contractual obligation on that supplier to act in accordance with the provisions of the Code whenever that system is being operated in partnership with, or at the request/ behest of the police.

High Court Considers Waiver of Privilege where Matter not Discussed. In the case of [PJSC Tatneft v Bogolyubov and others \[2020\] EWHC 3225 \(Comm\) \(24 November 2020\)](#), Mrs Justice Moulder considered an application by a defendant requesting a declaration by the court on whether the claimant had waived privilege in legal advice in circumstances where the witness had said that a particular matter was not discussed. Justice Moulder determined, as set out in paragraph 47 of the judgement, that on the authorities, the question for the court is for what purpose the communication is being referred to. She outlined a distinction between reliance on legal advice where a party has chosen to put forward a positive case in reliance on that advice, and a situation where the party in response to a case advanced by the other party denies an assertion made by the other party, “e.g. I did not discuss the house sale with my lawyer”. She concluded that in relation to this aspect of the application and, in consideration of the rationale for privilege, it must be correct that no waiver of privilege can occur by responding to an assertion by the other party as to the contents of an otherwise privileged communication.



Southwark Coroner's Court Concludes Air Pollution was a Material Contribution to Death. The [inquest record](#), states that air pollution exposure was a significant contributory factor to the acute respiratory failure suffered by Ella Adoo Kissi-Debrah's, and that she was exposed to nitrogen dioxide and particulate matter in excess of World Health Organization guidelines. The principal source of this exposure was traffic emissions. It concludes that Ella's mother was not given information on the health risks of air pollution and, if she had been given this information, she would have taken steps that might have prevented Ella's death. This inquest and, in particular, its conclusion that had information been given, it might have prevented the death, may well bring pressure to bear on local authorities to publish or signpost information on local air pollution levels and associated risks. The coroner's decision is expected to be followed by a 'prevention of future deaths report' which has the potential to be even more significant in terms of pressure on government bodies. Whilst the coroner cannot require particular action to be taken, the recipients of the report will have a duty to respond to it.

Court of Appeal Decides Confirms Private Prosecutor Entitlement to Costs for Confiscation Proceedings from Central Funds. The case of [Mirchindani v Lord Chancellor \[2020\] EWCA Civ 1260](#) followed a private prosecution by the appellant for fraud. The defendant in the case had failed to make payment of the confiscation order. In his judgement, Lord Justice Davis, commented that, as he saw it, there can "*be no rhyme or reason in permitting a private prosecutor's costs of confiscation proceedings to be paid out of central funds but then prohibiting such an outcome for enforcement proceedings with regard to the confiscation order so obtained*." There is a right to bring private prosecutions for most offences within the Prosecution of Offences Act 1985. A private prosecution is a prosecution started by a private individual, or entity (such as a company) who/which is not acting on behalf of the police or other typical prosecuting authority. Private prosecutions have grown in popularity recently, where a private party has been a victim of an offence. There are some advantages to a private prosecution, including more control over the investigation and prosecution; as well as the possibility of applying for costs to be reimbursed in the event of conviction.

Green number plates were introduced in the UK from 8 December 2020, and can be fitted to any vehicles which emit no CO2 emissions at the tailpipe. They will consist of a green flash on the left-hand side of the plate and can be combined with the Union flag and national identifiers. [Announcing this development](#), the government said that it underlined their commitment to tackling poor air quality in the UK's towns and cities and builds on the recent announcement to [end the sale of new petrol and diesel cars and vans in the UK by 2030](#), putting the UK on course to be the fastest G7 country to decarbonise these vehicles.

Greenhouse gas removals: call for evidence. The UK government has issued a [call for evidence](#) aiming to strengthen the government's evidence base on greenhouse gas removals (GGRs). GGRs are likely to make a contribution to the UK's net zero ambition, but many GGR methods are at an early stage of maturity and are not yet ready to be deployed at scale. Evidence has been invited on the viability of different GGRs in the UK, the role of government in addressing market barriers and stimulating the development and deployment of GGRs and supporting policies needed to enable deployment and scale-up. The call is open until 26 February 2021.

Government publishes initial commercial documents for carbon capture usage and storage (CCUS). The Department for Business, Energy and Industrial Strategy (BEIS) published an [update on the proposed commercial frameworks for transport and storage, power, and industrial carbon capture business models](#). These documents provide an update on the proposed CCUS commercial frameworks for business models that apply to transport and storage, power, and industrial carbon capture. A status update on the progress of the hydrogen business models is also provided.

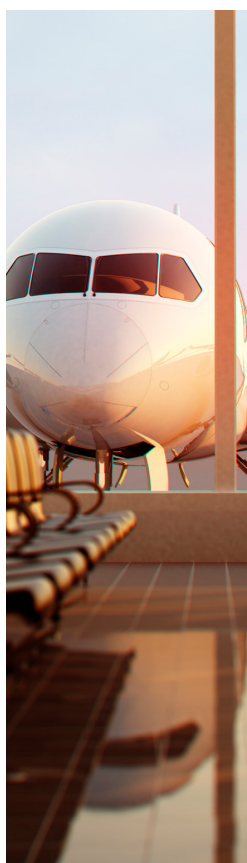


Committee on Climate Change (CCC) publishes recommendations for UK's sixth carbon budget for 2033 to 2037. The CCC presented what it described as “the first ever detailed route map for a fully decarbonised nation. A world first.” The report sets out the path to net zero, including detailed assessment of the changes that will result, and the key milestones that must be met. The CCC's recommendation for the sixth carbon budget reflects that emissions must fall by almost 80% by 2035, compared to 1990 levels, in order to meet the 2050 net zero goal, a big step-up in ambition and timetable. CCC's message to government is that the 2020s must be the decisive decade of progress and action on climate change. It says the changes are feasible and affordable but only if they are led by decisive action from government now.

UK sets new climate target for 2030. The government's [new plan](#) aims for at least 68% reduction in greenhouse gas emissions by 2030, compared to 1990 levels. The UK's previous target was 53%. The announcement was made ahead of the UK co-hosting a virtual UN climate ambition summit on 12 December, which coincided with the fifth anniversary of the Paris climate agreement. This new target forms the UK's updated nationally determined contribution (NDC) under the United Nations Framework Convention on Climate Change (UNFCCC) / Paris Agreement and the UK has restated its firm commitment to working with all parties to the UNFCCC to agree Paris Agreement rules on international market cooperation at COP26 in November 2021.

National Audit Office (NAO) issues report on achieving net zero. The report is intended to support parliamentary and public scrutiny of government's arrangements for achieving net zero. The NAO has applied experience from auditing cross-government challenges to highlight the main risks government needs to manage if it is to achieve net zero efficiently and effectively. The main conclusions are that achieving net zero will require wide-ranging changes across society and the economy at a pace which leaves little room for delay. The government needs to improve cross-government working to ensure all of government steps up to this challenge. Beyond internal structures, government also needs to spearhead a concerted national effort to achieve the ambitious outcome of net zero greenhouse gas emissions by 2050. HM Treasury also published its [Net Zero Review: Interim Report](#) setting out the analysis so far from the Treasury's Net Zero Review and seeking feedback on the approach ahead of the final report, due to be published in 2021.

Supreme Court reverses decision on Heathrow third runway. The [Supreme Court](#) allowed (on all four grounds) Heathrow's appeal against the Court of Appeal's February 2020 decision that the Airports National Policy Statement (NPS) was unlawful on climate grounds. The Supreme Court held that the UNFCCC and Paris Agreement were not 'government policy' for the purposes of the Planning Act 2008 (PA); the Secretary of State (SoS) had not breached his duty under the PA to “have regard to the desirability of ... mitigating, and adapting to, climate change”; the sustainability appraisal of the NPS was not defective in not referencing the Paris Agreement; and the SoS did not act irrationally in deciding not to assess post-2050 or non-carbon dioxide emissions when designating the NPS. This is a blow to campaigners but is not likely to be the end of challenges to plans for a third runway at Heathrow, which could include applications to the European Court of Human Rights. Shortly before the Supreme Court judgment was published, Plan B (who led the Heathrow claim) and others served a [pre-action letter](#) on the UK government alleging that its financing of the climate crisis, and its failure to develop a plan to tackle it, was a violation of their human rights and of UK and international law. The letter states that if the claimants do not receive an adequate response by 30 December 2020, they intend to issue legal proceedings seeking a declaration that the government's failure to take practical and effective measures is unlawful; an order that the government deliver a comprehensive, whole-of-government plan to address these failings as a matter of urgency; and a declaration that “international obligations” for the purposes of the government's memorandum of understanding on resolution planning and financial crisis management includes international obligations relating to climate change.





Government publishes long awaited Energy White Paper: Powering our net zero future.

The white paper builds on the Prime Minister's [Ten point plan for a green industrial revolution](#) issued in November. The white paper addresses the transformation of the UK's energy system, promoting high-skilled jobs and clean, resilient economic growth and delivering net-zero emissions by 2050. As well as setting out a strategy for the UK's wider energy system, the paper confirms that the government is introducing its preferred option of a UK emissions trading scheme (UK ETS) instead of a carbon emissions tax. Currently, the UK ETS will be standalone, although a link to the Eu emissions trading scheme (EU ETS) is foreseen in the EU/UK trade agreement which refers to co-operation on carbon pricing and "serious" consideration for linking carbon pricing systems in a way that "preserves the integrity of these systems and provides for the possibility to increase their effectiveness"

EA consults on UK ETS charges. The consultation covers the proposed charges to covers its regulation of the new UK ETS from January 2021. The proposals include retaining the charging structure from the EU ETS but with a new UK ETS set of charges, starting from April 2021. The consultation closes on 29 January 2021

BEIS and Environment Agency (EA) publish updated guidance on climate change agreements (CCAs). BEIS published [updated guidance](#) in the CCA scheme technical annex to reflect the two-year extension of the CCAs (a fifth target period from 1 January 2021 to 31 December 2022 and extended certification for reduced rates of climate change levy to 31 March 2025). The EA, in its role as the CCA scheme administrator, also published updated [statutory guidance](#) to reflect this extension.

EA Publishes Update on Waste Quality Protocols (QPs) Review. Waste QPs are end of waste frameworks that industry can volunteer to follow, to establish when certain wastes can become non-waste once they have been fully recovered. There are 13 QPs for a range of waste-derived materials. However, the government recognises that these may now be out of date and may not meet current technical standards or best practice. For each QP, the government will decide if it will continue to support it and republish it, require it to be revised before being republished, or withdraw support because it no longer meets current standards. The government will publish the [outcomes of completed reviews](#). Reviews for anaerobic digestate, compost and poultry litter ash QPs have been undertaken and concluded that revisions were needed. The outcome document specifies the issues that need to be addressed for each QP and an industry-funded task and finish group for each one needs to be set up by 30 May 2021 to avoid the QP being withdrawn. Reviews have not started for the remaining 10 QPs, but are scheduled to start between January and May 2021.

Government Issues Guidance Confirming Changes on Waste Plastic Import and Export Rules. Following changes to the international shipment rules under the Basel Convention and OECD rules, this guidance confirms the new requirements for using "green list" waste controls for plastics from 1 January 2021. The green list procedure (rather than the more onerous notification and consent procedure) can only apply to plastics that meet the definition of the Basel waste code B3011. This waste plastic must be a single polymer plastic, almost free from contamination and other types of waste, including other waste plastics, and being shipped for recycling (R3).





EU/UK Trade Deal: Environmental and Products Standard Highlights. We are still digesting the implications of the trade deal on the numerous areas of law and policy that it affects, but some key initial points to note are:

- Both parties commit to ensuring a robust level playing field by maintaining high levels of protection in areas including environmental protection, climate change and carbon pricing, social and labour rights, with effective domestic enforcement, a binding dispute settlement mechanism and the possibility for both parties to take remedial measures
- It provides for zero tariffs and zero quotas on all goods that comply with the appropriate rules of origin
- The agreement does not change the requirements for separate/mirror UK chemical regulation (such as UK-REACH or UK-CLP)
- While the chemicals annex refers to cooperation between authorities, including cooperation over non-confidential information through a specialised committee, it does not address UK access to EU-REACH registration data, so there could still be significant cost duplication for companies to be able to use existing data for UK-REACH purposes

An overview of the deal can be found on our [Brexit Legal blog](#).

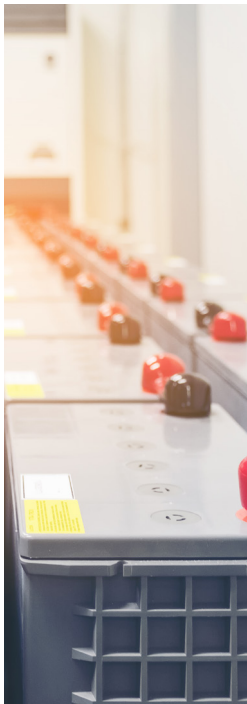
Government Waste Guidance Updated to Reflect Most Recent (2018) Updates to the Waste Framework Directive. Various waste guidance documents have been updated, including [Legal definition of waste guidance](#) and [Turn your waste into a new non-waste product or material](#). The EA has added a new [section](#) to the legal definition of waste guidance, which explains the 2018 updates (primarily relating to end of waste criteria) and the government's approach on this issue.

Convicted Waste Offender Ordered to Pay £2.1 million in Proceeds of Crime Order. A man convicted of a waste offence has been ordered to pay £2,101,708 following a [confiscation case brought by the EA](#) under the Proceeds of Crime Act 2002. He was initially prosecuted for six offences where waste totalling about 25,000 cubic metres was either dumped, buried or burned at a farm where he was operating an illegal waste site. The court heard that the defendant had grown his business and had invested in various properties, land and cars. He also owned a large selection of heavy plant, which he hired, bought and resold. The judge held that a trust set up by the defendant was a sham and that money held in a bank account operated by the trust, along with a property, formed part of his criminal benefit. This is one of the largest proceeds of crime orders obtained by the EA.

European Commission Starts Revision of Rules on Food Contact Materials (FCMs).

The Commission [published](#) a detailed inception impact assessment (IIA) as a roadmap for the initiative. The evidence and feedback collected so far has confirmed the existence of problems that are linked to the lack of specific EU rules, which lead to uncertainty about safety of some FCMs and internal market problems, as well as broad support for introducing such specific EU rules from stakeholders. Among the specific policy options is prioritising the assessment and management of substances with a tiered approach, based on factors including identified hazard properties, use, migration potential and eventual exposure. Another specific option is supporting safer and more sustainable alternatives by introducing specific rules to ensure that FCMs manufactured from potentially more sustainable sources and methods, such as plant- or bio-based, are subject to dedicated and clear rules, as well as expanding rules on all forms of safe re-use and recycling, to exclude risks from contamination and to include all recycling technologies. An impact assessment, during which further sub-options might be developed, will run in parallel with the evaluation process. Stakeholders can submit comments on the IIA until 29 January 2021. The Commission plans to adopt a legislative proposal in 2022.



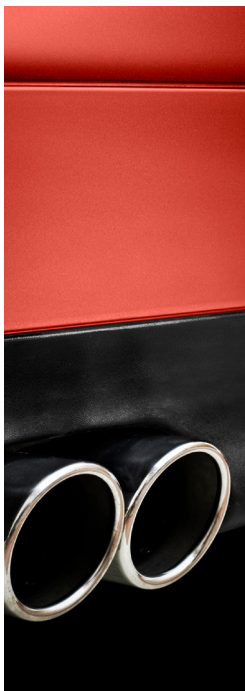


European Commission Publishes Proposal for New Sustainable Batteries Regulation. The Commission has issued a proposed new Batteries Regulation, which would replace the Batteries Directive 2006. The proposed Batteries Regulation seeks to modernise existing EU batteries legislation and ensure the sustainability of batteries placed on the EU market throughout their life cycle. The proposals include mandatory sustainability criteria, declaration of recycled content and new requirements for the collection, treatment and recycling of end of life batteries.

EU Member States Adopt Response to New Circular Economy Action Plan (CEAP 2.0).

The European Commission adopted [that policy document](#) in March 2020. [The conclusions](#), which the Environment Council [adopted](#) on 17 December, could inform the Commission's priorities and indicate where the member states stand regarding the many initiatives that they address. Among other things, the Council strongly welcomed the CEAP 2.0 as a central pillar of the European Green Deal. The Council calls upon the Commission to develop numerous areas of regulation, and welcomes many of the existing measures proposed by the Commission. It encourages the Commission to extend a review of the Packaging and Packaging Waste Directive to include, where appropriate, provisions related to recycled materials in packaging similar to the approach used for plastic bottles in the Single-use Plastics Directive. It also stressed the importance of strengthening the collection, sorting and recycling of plastic waste and the strategic infrastructure for high-quality recycling, and called on the Commission to propose, without delay, further measures to foster a stronger demand for recycled material, such as EU minimum requirements for recycled content in plastic products, and limiting the export of plastic waste outside the EU. The Council also encouraged pilot projects and the upscaling of emerging innovative technologies, such as advanced mechanical or chemical recycling of plastics, while ensuring that these reduce overall environmental impacts in a life cycle perspective, and invited the Commission to define the conditions under which chemical recycling is to be considered as recycling. It underlined that any potential application of bio-based, "biodegradable" or "compostable" plastics should be based on life cycle assessments and called on the Commission to develop a clear policy framework to prevent misleading consumers, and to reduce plastic littering and unintended pollution, to ensure adequate treatment and to avoid undermining recycling of other types of plastic waste.

European Commission Amends Rules on Imports, Exports and Intra-EU Shipments of Plastic Waste. [The Commission Delegated Regulation 2020/2174](#) was published in the Official Journal after the usual period of [scrutiny](#) by the Council and European Parliament. It will amend the Waste Shipment Regulation 1013/2006 (WSR) from the start of 2021. The amendments take account of the changes to the UN Basel Convention, and the OECD Decision, as well as the fact that no agreement has been reached within the OECD to incorporate the amendments to the Basel Convention on non-hazardous plastic waste (entries B3011 and Y48). The Commission [said](#) that the new rules should end the export of plastic waste to third countries that often do not have the capacity and standards to manage it sustainably. Exporting hazardous plastic waste and plastic waste that is hard to recycle from the EU to OECD countries and importing such waste into the EU from third countries will be subject to the "prior notification and consent procedure". For intra-EU shipments, a "Green List" waste code EU3011 applies to, among others, plastic waste, provided it is almost free from contamination and other types of waste. The Commission has been consulting on new [guidelines](#) that would interpret these terms (please see [frESH Law Horizons November 2020](#)).



European Commission Opens Public Consultation on Industrial Emissions Directive (IED).

The Commission [announced](#) the revision of Directive 2010/75 and published the [results of an evaluation of the IED](#) earlier in 2020 (please see [frESH Law Horizons March 2020](#) and [September 2020](#), respectively). The public consultation takes the usual form of an online survey. It is combined with the consultation on the European Pollutant Release and Transfer Register (Regulation 166/2006), whose revision the Commission had [announced](#) in September 2020. Among many other things, the survey asks about the need to include the following new sectors in the scope of the IED: medium combustion plants, oil and gas extraction activities, intensive rearing of cattle and aquaculture, mining, urban wastewater treatment and landfills, as well as storage of hazardous substances. It also asks about options that will facilitate industry's shift to a climate-neutral, clean and circular economy. [The public consultation](#) will run until 23 March 2021. The Commission plans to adopt legislative proposals in Q4 2021.

EU Member States Agree Their Position Regarding the Proposal on Improving Access to Environmental Justice Under the Aarhus Convention.

The European Commission has adopted a [proposal](#) that would amend Aarhus Regulation 1367/2006 on the application of the provisions of the UN Aarhus Convention on access to information, public participation and access to justice in environmental matters to EU institutions and bodies (please see [frESH Law Horizons October 2020](#)). It would expand the rights of NGOs to demand reviews of administrative acts. The Environment Council adopted its negotiation position ([general approach](#)) on 17 December. It generally endorsed the Commission proposal. However, among other things, it seeks to exempt from internal review those provisions of an administrative act for which EU law explicitly requires implementing measures at the EU or national levels. In early December, a group of members of the European Parliament (MEPs) called on the Council to wait for advice from the UN Aarhus Convention Compliance Committee (ACCC) before agreeing on its position, as requested by the ACCC. The Commission had asked the ACCC for that advice on its proposal. It is expected by the end of December. The European Parliament is now expected to follow with its position in early 2021, and both will enter into legislative negotiations with a view to adopting the final law afterwards.

EU Member States Agree Their Position Regarding the Proposed European Climate Law.

The Council [reached](#) an agreement on its [general approach](#) on the proposal for a European Climate Law. It includes a new EU greenhouse gas emissions reduction target of at least 55% by 2030 compared to 1990, following the guidance of the [European Council earlier in December 2020](#). The main aim of the European Climate Law is to set into legislation the objective of a climate neutral EU by 2050. In March 2020, the European Commission adopted its proposal, which it [amended](#) in September. The European Parliament [adopted](#) its position in October, calling for a reduction of 60% in 2030 and an interim target for 2040, to be proposed by the Commission following an impact assessment (please see [frESH Law Horizons October 2020](#)). In the same month, the Council adopted a [partial general approach](#) in October, which did not yet include its position on the level of the 2030 target. The Council and Parliament are expected to continue their negotiations (so-called trilogues) on the proposal. The Council has also [transmitted its submission on the NDC of the EU](#) and its member states to the UNFCCC in equivalent terms.

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