Contents

Perspectives	1
Deference to the Administration in Judicial Review in Argentina Pedro Aberastury	23
Deference to the Administration in Judicial Review in Australia Fleur Kingham	39
Comparer la déférence judiciaire : regards canadiens vers l'extérieur Nicolas Lambert	89
Deference to the Administration in Judicial Review in China	105
Deference to the Administration in Judicial Review in the Czech Republic	133
Deference to the Administration in Judicial Review in Denmark Bent Ole Gram Mortensen and Frederik Waage	157
Deference to the Administration in Judicial Review: The European	
U nion	165
Deference to the Administration in Judicial Review in Finland	181
A Principled Approach to Judicial Deference for Hong Kong Cora Chan	203
Judicial Deference to the Administration in Israel	231

xii Contents

Judicial Review of Administrative Action in Italy: Beyond Deference? Giacinto della Cananea	271
Deference to the Administration in Judicial Review in Japan	295
Deference to the Administration in Judicial Review: The Case of the Netherlands	327
The "Dreadful Truth" and Transparent Fictions: Deference in New Zealand Administrative Law	345
Deference to the Public Administration in Judicial Review: A Polish Perspective	363
'The Notion of a Subjective or Unfettered Discretion is Contrary to the Rule of Law': Judicial Review of Administrative Action in Singapore	379
Full Judicial Review or Administrative Discretion? A Swedish Perspective on Deference to the Administration	405
Judicial Deference to the Administration in the United States John C. Reitz	417