

The Municipal Gazette

BEING THE OFFICIAL ORGAN OF
THE EXECUTIVE COUNCIL FOR THE FOREIGN SETTLEMENT OF SHANGHAI.

Vol. XVII.

SHANGHAI, SATURDAY, JULY 19, 1924.

No. 927

REPORT OF CHILD LABOUR COMMISSION.

The following is the Report of the Child Labour Commission appointed by the Council to consider this question in accordance with the terms of reference published in the Gazette of June 14, 1923. The various recommendations made will, in due course, receive the Council's careful consideration:—

Shanghai, July 9, 1924.

SIR,—I have the honour to enclose herewith, in duplicate, the unanimous signed Report of the Child Labour Commission.

I have the honour to be, Sir,
Your obedient servant,

J. M. MCKEE, Esq.,
Assistant Secretary.

JAS. W. FRASER,
Secretary.

Shanghai, July 14, 1924.

SIR,—I am directed to acknowledge receipt of your letter of July 9, transmitting for the Council's consideration the Report of the Child Labour Commission.

In thanking you for this document, I have the honour to express the Council's appreciation of the public spirited action of the members of the Commission individually in giving the Council the benefit of their experience on the very important issue in question, and in devoting so much of their valuable time to consideration of the serious problems involved. The able, lucid and comprehensive nature of the report, as finally presented, has placed the Council and the Ratepayers under a very heavy obligation, and, on behalf of the community, the Council takes great pleasure in extending to the members of the Commission its very grateful thanks. In the circumstances, members of the Commission will agree that a special vote of thanks is due to Dame Adelaide Anderson for her co-operation and the expert advice which she contributed to the Commission.

I have the honour to be, Sir,
Your obedient servant,

J. W. FRASER, Esq.,
Secretary,
Child Labour Commission.

J. M. MCKEE,
Assistant Secretary.

PART I.

The Commission was appointed by the Council in June, 1923:—

**Terms of
Reference.**

“To enquire into the conditions of child labour in Shanghai and the vicinity and to make recommendations to the Council as to what regulations, if any, should be applied to child labour in the foreign Settlement of Shanghai, having regard to practical considerations and to local conditions generally.”

The Commission has held thirty-three meetings and heard the evidence of thirty-six witnesses. Amongst the witnesses who gave evidence were doctors, officers of the Municipal Services, social welfare workers, employers, contractors, and one woman who had worked for many years in silk filatures. It was early apparent that, apart from the widespread and continuing activities of certain groups and committees interested in religious, social, and industrial work, there was little general public interest in Shanghai in the subject-matter of this enquiry. In this connexion it might be mentioned that, upon notice being inserted in the native and foreign press informing the public of the appointment of the Commission and the nature of its labours, and inviting all who might desire to attend before it and give evidence, response was made by two persons only; one, a foreigner who expressed the opinion, based on a long residence in this country, that whereas a large proportion of the children in China are bright and intelligent, the monotonous routine of work and absence of education results in a considerable number of the adults being unintelligent and dull; the other, a native interested in the supply of child labour to a waste silk filature, who, it was soon obvious, came merely to ascertain how far his particular activities would be affected by any action taken by the Commission. Other than these two individuals the witnesses who gave evidence were persons who did so at the express request of the Commission.

**Preliminary
Observations.**

One result of this lack of general public interest was that, with the exception of certain industries, such as cotton manufacturing and silk reeling, the Commission had to be content with information of a more or less general character, supplemented as far as was possible by the personal observations of its members. As far as the Commission has been able to ascertain there are few records of observations by individuals or bodies, whether native or foreign, and no reliable statistics upon any of the matters germane to this enquiry. The ground broken was virgin soil, and it is not pretended that the conclusions of fact at which the Commission has arrived are either exhaustive or beyond modification. Modern conditions of mass production, involving as they do the use of power-driven machinery and

the employment of large numbers of work people in the confined space of a mill or factory, comparatively speaking, new to China. They exist to-day only in a few areas, most important of which is Shanghai and its vicinity where the industrial development in recent years has been very rapid. The general standard of living throughout the whole country compared with other and, from a modern industrial point of view, older parts of the world is extremely low. There are no facilities for the education of the vast majority of the people. Circumstances such as these, coupled with a large birthrate, result, in the case, in the population ever tending to outstrip the means of subsistence. The industrial workers are, generally speaking, unorganized and Trade Unions with the help of which accumulated funds are entirely unknown.

**Evidence—
General.**

The evidence as to the present average earnings of unskilled labourers in the Shanghai district was somewhat conflicting. It can be said, however, with some certainty, that the average monthly earnings of a workman of the coolie class are not greater than \$8, whilst in some instances, such as ricksha coolies, they may be as low as \$8. One witness stated that an adult female feather-sorter did not receive more than ten cents for a day's work. The average cost of living for a man and his wife of the very poorest class is generally given as \$16 a month. The Commission has no reason to believe that earnings in the Shanghai district are lower than in any other part of the country. On the other hand, there is every probability that relatively they are slightly higher.

There is no doubt that it is the general practice for the vast majority of Chinese children to be made by their parents or others having authority over them to commence to work at the earliest age possible, having regard to the nature of the work available. Where the family is engaged in tilling the soil there is little harm, except upon educational grounds, in this practice, as it is unlikely that the child will attempt or be made to attempt to do beyond its capacity. This statement, however, is not true where the work in question has to be performed under less hygienic conditions, and still less is it true where it involves long hours and monotonous operations. This general practice obtains in the Shanghai district equally with the rest of China. The causes of its existence are economic, social, and absence of educational facilities, but, in the opinion of the Commission, the first named is the primary cause.

**Evidence—
Medical.**

The medical evidence taken by the Commission and germane to this enquiry can be summarised as follows: It was stated that country children in China are of good physique whilst those living in the cities are, generally speaking, below the standard of Western countries. Tuberculosis is particularly prevalent in the towns. It was stated by a doctor that she really believed that children were worse off in the modern factories than their native homes because of the humidity of the air which was bad for the tubercular child. The crowded living conditions are to a great extent responsible for the poor physique observed. It was agreed by all the medical witnesses that the existing industrial conditions in Shanghai are extremely adverse to the bodily and mental welfare of the Chinese child employee. Such children, as a body, were said to be physically inferior to those so employed but no definite measurements or other particulars were given. Industrial accidents were largely attributed to fatigue and carelessness following on long hours of monotonous work.

**Evidence—
Particular
Industries.**

The industries in which children are employed may be divided for the sake of convenience into three classes:—

1. *Domestic.*—Young female children are commonly purchased and employed as domestic servants. They probably begin to work as soon as it is possible for them physically to do so. This practice is general throughout the country. It obviously lends itself to great abuse and the Commission has little doubt that, like other forms of slavery, it is the source of much human misery. The Commission has reason to believe, from the evidence given before it, that many slave children are employed in native brothels and trained to prostitution. Such sale of female children, although undoubtedly contrary to Chinese law, does not appear to be interfered with in any way by those charged with the administration of justice. It is, however, true that in cases where actual cruelty is proved the International Mixed Court at Shanghai will order children to be taken away from the custody of the persons concerned. Apart from evidence as to the existence of this practice and its resultant evils, the Commission was able to obtain little reliable information as to the general conditions of the employment of children as domestic servants.

2. *Shops, Small Work Shops, Home Industries, Laundries and the Building Trades.* The apprentice system is general in these occupations. The commencement age varies according to the nature of the employment. There is little doubt that the average child is apprenticed at the earliest age at which, having regard to the nature of the particular occupation, it can begin to learn, and at the same time be of some value to its employer. The term of apprenticeship is usually about five years and the apprentice receives during that time little, if any, pay. Except as regards laundries and the building trades, which will be dealt with in more detail later, the Commission was unable to obtain any further information as to the conditions of the employment of children in these industries. Having regard to human nature, the conditions no doubt vary between those incident to slave labour and those compatible with humane and proper employment.

3. *Mills, Factories and Similar Places of Industry.*—The commencement age varies with the nature of the employment, but it can be asserted that, generally speaking, the child begins to work in the mill or factory as soon as it is of any economic value to the employer. The Commission has visited a number of mills and similar places of employment both during the day and at night, and has seen very many children at work who could not have been more than six years of age. The hours of work are generally twelve, with not more than one hour off for a meal. The children frequently have to stand the whole time they are at work. In many industries day and night work is the rule, there being two shifts of twelve hours each. In most instances the mill or factory stops for one shift at week-ends, and in others, in addition to this, endeavours are made by the employer

but without much success, to ensure that their work people take one day off from work every two weeks. Apart from interruptions and the customary holidays at China New Year, work is continuous. Wages are paid only for working days. In many cases the atmospheric and dust conditions are bad. The sanitary arrangements in the majority of mills and factories leave very much to be desired. The average earnings of a young child are usually not more than twenty silver cents a day. The contract system of employment is common. Under this system the native contractor supplies the requisite labour and is paid on production. This system is obviously open to grave abuse. The Commission heard evidence to the effect that in some instances contractors obtain young children from the country districts, paying the parents \$2 a month for the services of each child. By employing such children in the mills and factories the contractor is able to make a profit of about \$4 a month in respect of each child. These children are frequently most miserably housed and fed. They receive no money and their conditions of life are practically those of slavery.

With these general observations, the evidence heard as regards the industries which the Commission was able to consider with more particularity may be summarized as follows :

Cotton mills.

1. *Cotton Mills.* Generally speaking, there is little to complain of in the conditions as to space, but sometimes the ventilation is inadequate. The temperature of the air is necessarily slightly above the normal, and there is a certain amount of dust and raw cotton fibre suspended in the atmosphere. In some instances the temperature was found to be higher and the dust conditions worse than were justifiable. The sanitary conditions are not satisfactory. In many cases little attention is paid to the state of the latrines, and the stench near such places is very marked. In normal times night work is the rule. There are two twelve-hour shifts. In some mills there is a cessation from work for one shift at week-ends, but in such cases the last shift is longer than twelve hours. In one instance the length of the shift was given as thirteen and a half hours, and in another fifteen hours. On occasions where there is no night shift the length of the day's work is frequently thirteen hours or even more. In some mills there is a regular one-hour interval for meals, whilst in others the employees take their meals as best they can. The children are mostly employed in the Spinning Department, and in the great majority of cases have to stand the whole time they are at work. It is difficult to state definitely the lowest age at which the children commence work. The Commission, however, saw many children at work who could not have been more than six or seven years of age. Some of these children are not on the pay-roll but are allowed to be brought by their mothers in order that they may be under their care. In many mills the conditions during the night shift are, according to Western ideas, most unusual. Rows of baskets containing babies and children, sleeping or awake as the case may be, lie placed between the rapidly moving and noisy machinery. Young children, who are supposed to be working, but who have been overcome by fatigue or who have taken advantage of the absence of adequate supervision, lie asleep in every corner, some in the open, others hidden in baskets under a covering of raw cotton. The discipline appears to be lax, and those in charge seem to wink at much that goes on in this respect. The Commission noticed that on its advent a warning whistle was given and many of the children were awakened by their immediate neighbours and hurried back to the machines. The contract system of employment above described is common. Many children, however, come with their parents and some independently. The wage of a child in this kind of employment is twenty silver cents a shift. The Commission is satisfied that the general standard of living amongst the class of persons employed in the cotton mills, including the children, has risen greatly by reason of the employment provided. It was stated by one witness that twelve years ago 75 per cent. of these work people had little clothing and were without footwear. There appears to be no shortage in the supply of labour and the Commission is satisfied that there would be no shortage should young children be debarred from employment in the Shanghai district. Efforts are being made in some mills to prevent admission of very young children, and are, at least, partially successful. There is a great difference to be observed as regards the age of children employed between mills where these efforts are being made and mills where they are not. One Japanese firm, owning many mills in China, provides some elementary educational facilities for the young children of its employees.

Silk Filatures.

2. *Silk Filatures.*—Nearly all the employees in the silk filatures are women and young girls. Generally speaking, one child is employed for every two adults. The children brush the cocoons and prepare them for the reelers by removing the waste and so exposing the silk thread. This operation is performed over basins containing nearly boiling water with which the fingers of the children frequently and necessarily come in contact, thereby becoming roughened and unsightly. The Commission is not satisfied that any permanent injury is caused to the hands of the children by reason of this work. Night work is unusual. The regular hours of work are twelve, usually being from 6 a.m. to 6 p.m. The children, however, have to be at the filatures some little time (15 to 20 minutes) before the hour for commencing work, in order to get things ready for the adults.

An hour in the middle of the day is allowed for a meal. In some filatures an interval of about fifteen minutes is also allowed for breakfast. Many of the children employed are very young, being certainly not more than six years of age. It was stated that children under thirteen years of age are not employed in filatures in France and Italy. In the Shanghai district the children almost invariably stand the whole time they are at work, five or six hours at a stretch. Whilst at work many of them develop a peculiar regular and rapid up-and-down movement of the body by means of alternately relaxing and then straightening their knees. Seats are provided in a few filatures, but are rarely used, probably either because the seats are unadjustable, or because it is easier to perform the work standing. Owing to the presence of the hot water in the basins the temperature of the workroom is always considerably above the normal and the atmosphere is very humid. It was stated that fainting in hot weather is not uncommon. The children earn from

twenty to twenty-five silver cents a day. In the main they present a pitiable sight. Their physical condition is poor, and their faces are devoid of any expression of happiness or well-being. They appear to be miserable, both physically and mentally. The adults are given a certain number of cocoons from which they have to produce a certain quantity of silk. Should they fall short of this quantity they are fined. They then frequently revenge themselves by ill-treating the children working under them. The Commission is satisfied that the conditions under which these children are employed are indefensible. The work could be done by adults. There is, however, usually a shortage of labour, and moreover, if adults were employed instead of children, owing to the difference in height, the machinery used would probably have to be reconstructed.

Evidence was heard that in one well-run and apparently prosperous native filature at Hangchow the boiling room is separate from the reeling room, each boiler being managed by four boys of about sixteen years of age. Under this system the softened cocoons after boiling are placed in small wooden containers half full of cold water and then removed to the reeling room. Evidence was also heard that a similar system prevails in Japan. It was stated that this method of operation greatly lessens the number of children employed and does away with many of the undesirable conditions above-mentioned. The question as to whether this system could be introduced successfully into the Shanghai district in place of the present Italian method is of a technical nature concerning which the Commission, upon the materials before it, does not feel qualified to pass an opinion.

Cigarette and Tobacco Factories.

3. *Cigarette and Tobacco Factories.*—As far as the Commission was able to ascertain, there are not many very young children employed in these factories. The conditions of employment appear to be better than those in Cotton Mills and Silk Filatures, but full time employment throughout the year, such as has been general in the cotton and silk industries in past years, is not the custom in these industries. The hours of labour are shorter, being nine to ten exclusive of meals. The children usually sit at their work which is light in nature. They earn from twenty to thirty silver cents a day. Night work is not so frequent as in the Cotton Spinning Industry.

Engineering and Shipbuilding.

4. *Engineering and Shipbuilding.*—The apprentice system is the rule. Not many children under sixteen are employed in the large foreign-managed works. A certain number of boys between the ages of fourteen and sixteen are employed in cleaning the interior of boilers. It was stated that owing to the small size of some boilers young boys were the only persons who could perform this work. The ordinary working hours are nine exclusive of meal times. Night work is not unusual. Conditions in the smaller native shops are different. As in other industries, the boys are no doubt apprenticed at the earliest age possible having regard to the nature of the work.

Printing Works.

5. *Printing Works.*—Evidence was heard as to the conditions of employment in one large native Printing Works. As a rule, in these works no one under fourteen years of age is admitted. There is a height test for both boys and girls. The girls are employed in light work and the hours of work are not excessive. A nursery is provided where mothers can leave their babies whilst they are at work. These works are a model establishment. There are many small native printing works where, so it was stated, the conditions of work are bad and in which quite young boys are employed.

Match Factories.

6. *Match Factories.*—There are several in the Shanghai District. Certain operations, such as boxing the matches and making up parcels of boxes, can be and are performed by quite young children. As little as nine copper cents is sometimes paid to a child for a day's work. Members of the Commission visited one factory of considerable size. Young children, certainly not more than five years of age, were to be seen working with almost incredible rapidity. Many babies and infants, who could hardly stand, slept or played on the floor whilst their mothers worked. White phosphorus is used in some of these factories, and cases of phosphorus poisoning have been observed. It was stated that the native authorities are making regulations, which are to come into force next year, forbidding the use of white phosphorus, and that there is a possibility that they will be observed. The use of white phosphorus and the importation of matches made with this material have since 1908 been prohibited by, amongst other countries, Great Britain, Denmark, France, Germany, Holland, Italy and Switzerland. Whilst special risk of fire undoubtedly attaches to this industry no precautions, such as the provision of fire prevention screens between the individual workers, mostly very young, engaged in boxing, or ample space between boxing stands, were observed in the factory visited by members of the Commission. From a casual observation of the dwelling adjacent to the factory it was evident that out-work was extensive.

Evidence was heard that such out-work consists of the making of boxes by mothers and their young children. The children are mostly from five to ten years of age. The materials are supplied by the factory through a middleman, and payment is made through him. The starch for pasting on the paper has to be provided by the workers. Payment is made at the rate of nine coppers per thousand for the inside part of the boxes, and seven coppers per thousand for the outside part. It was stated that a woman with two children can finish from two to three thousand parts a day, and it was also stated that the earnings of the husbands in the particular cases enquired into, who were a carpenter, sailor, ricscha coolie and messenger respectively, were not otherwise sufficient to maintain the family.

Laundries.

7. *Laundries.*—There are seventy hand laundries licensed by the Council under Bye-law 34, of which eight are situate outside the Settlement limits. About seventy boys under fifteen years of age are employed by these laundries. No girls are so employed. The boys apparently start work when about thirteen or fourteen years old. Boys of ten years of age have been found to be employed, and, generally speaking, they all appear to be undersized and much younger than the age given on enquiry. It was stated that some of them look weakly and stunted and that many of them suffer during the winter months from chilblains and resultant sores. It was further stated that the smaller boys are to be seen on occasions carrying greater weights than they can properly manage. The work per-

formed consists chiefly of the collection and delivery of clothing, transport of washing to and from the drying grounds and watching the same, and attending to stoves, cleaning, ironing and doing odd jobs. The hours of work are usually from dawn or early morning until dusk and often until late at night. Half-an-hour or more is allowed for the mid-day meal. The apprentice system is common, \$60 or \$70 being paid to the parents for an apprenticeship period of three years. The boys are fed and lodged by the employer. They are usually lodged in rooms adjoining the laundries, sleeping on stages, trestle beds or on the floor. They frequently have to eat and sleep in the same room. The laundry business is in the hands of many small owners, who have little or no capital. They rent cheap houses, paying rent from \$7 upwards a month. It is not easy for them to obtain the right kind of premises as property owners are unwilling to let for this purpose, since buildings so used quickly depreciate in value. In wet weather the clothes have to be dried on the laundry premises which become steamy, hot, and most unhealthy. It was stated that the licence conditions most frequently broken were those against sleeping on the premises and squirting from the mouth. The drastic punishment of loss of licence is not often imposed. The witness who gave evidence also stated that in his opinion the boys were no worse off than those employed in other industries. There is only one power laundry in the Shanghai district.

8. *Building Trade.*—The apprentice system is universal, the term of apprenticeship being three to five years. It was stated that the commencement age was eleven. The Commission, however, is satisfied that, as in other industries, many of the children start work at a younger age than this. No girls are employed. The apprentices start work chiefly with the masons and carpenters, carrying loads and learning to saw and plane. The hours of work are usually eight to ten a day. In winter-half-an hour is allowed for a mid-day meal, in hot weather two hours. The contract system of employment is the rule. It was stated that in the Shanghai district there were about 20,000 apprentices in this trade, most of whom live with sub-contractors away from their parents. It was also stated that the food given to the apprentices by the contractors is frequently poor, and that it is worse when they are not being employed.

Building Trade.

The Commission also heard evidence with regard to the question of the protection of workers against injury from fire. It was stated that on the whole conditions were very bad. In the case of new large buildings before construction plans have to be submitted to the Chief Officer of the Fire Brigade for his approval. After completion, however, there is no power to force the occupier to keep them in a safe condition in this respect. Fire escapes, staircases and other means of egress are frequently kept blocked with material and doors are barred. Many old buildings are in a very unsafe condition. Officers of the Fire Brigade make tours of inspection from time to time and attention is called to dangerous conditions, but very little notice is taken. It was further stated that, given the necessary powers, the enforcement of regulations would not necessitate any large increase in the Staff of the Brigade.

Fire Protection.**PART II.**

Having taken all available evidence, the Commission entered upon the most difficult part of its task, namely, the consideration of the question as to what recommendations it should make to the Council. The Commission throughout its deliberations had to keep in mind the terms of the reference to it which expressly stated that regard had to be had to practical considerations and to local conditions generally.

Preliminary Observations.

The present International position with regard to the regulation of the employment of children and young persons may be stated briefly as follows:—

Present International Position.

At the International Labour Conference of the League of Nations held at Washington in October, 1919, a number of draft conventions and recommendations were drawn up dealing with the following amongst other matters.

(1) The limitation of the hours of work of all persons (other than those holding managerial or confidential positions) in industrial undertakings to eight in the day and 48 in the week. China was expressly excluded from the operation of this Convention, whilst in the case of India, a sixty hour week was adopted for all workers in industries covered by the Factory Acts administered by the Government, and in mines and certain branches of railway work. Further consideration of this question so far as India and China were concerned was left for a future meeting of the General Conference. In the application of the Convention to Japan a modification was adopted whereby the actual working hours of persons of fifteen years of age (sixteen from July 1, 1925) or older can be increased in the case of the raw silk industry to sixty hours, and in the case of other industrial undertakings to fifty-seven hours in the week.

(2) The fixing of fourteen years as the minimum age for the employment of children in industrial undertakings, other than undertakings in which only members of the same family are employed. To facilitate the enforcement of this provision, the Convention stipulated that every employer should be required to keep a register of all persons under the age of sixteen years employed by him and the dates of their births. In the case of Japan the Convention provided that children over twelve might be admitted into employment if they had finished the course in the Elementary School. India was expressly excluded from the provisions of the Convention, except that the employment of children under twelve was prohibited in factories working with power and employing more than ten persons, and in mines and quarries and the transport services except transport by hand.

(3) The prohibition (with certain exceptions in the case of young persons over the age of sixteen in the event of sudden emergency) of night work under the age of eighteen years. In the case of Japan, the Convention, until the 1st of July, 1925, was to apply only to young persons under fifteen years of age, and thereafter to those under sixteen years of age. As regards India the Convention was not to apply to young male persons over fourteen years of age.

(4) The exclusion of young persons under the age of eighteen years from employment in certain processes involving the use of lead, and the prohibition of the employment of such young persons in processes involving the use of lead compounds other than subject to certain conditions as to ventilation, cleanliness, medical examination and compensation in case of poisoning.

(5) The adoption of the Berne International Conference of 1906 prohibiting the use of white phosphorus in the manufacture of matches.

Although it was suggested at the Conference that China should be asked to accept the principle of the protection of labour by factory legislation, and that the Governments having jurisdiction in Settlements and leased territories outside Chinese jurisdiction should also adopt this principle, the question was postponed for consideration at a future Conference. It is evident that the Conference recognized that circumstances made it impossible for China immediately to conform to Western standards.

Certain of these Conventions and recommendations have been adopted by a number of countries and are therein enforced. China, whilst not having up to the present time adopted any of them, has promulgated certain provisional Regulations (see Appendix No. IV), which, in so far as they touch the employment of children, will be dealt with later.

In Hongkong the employment of children is regulated by the Industrial Employment of Children Ordinance, 1922, (see Appendix No. III), which was passed as a result of the Report of the Industrial Employment of Children Commission appointed by the Governor in Council in March, 1921. Briefly stated the Ordinance and the Regulations made thereunder prohibit:—

(a) The employment of children (defined as persons under fifteen years of age) in boiler chipping, the manufacture of fire works and glass-making, all of which are declared to be dangerous trades.

(b) The employment of children for any period between 7 p.m. and 7 a.m. or during the day for more than five hours continuously. It should here be noted that the Ordinance also provides that between any such spell of work and the next one there must be an interval of relaxation of not less than one hour, and that every child shall be allowed one day's rest in every seven days.

(c) The employment of children under the age of ten years in any factory.

(d) The employment of children under the age of twelve years in carrying coal or building material or debris or any unreasonably heavy weight.

The Ordinance also provides for the appointment of an Official Protector of Juvenile Labour with the right to search industrial premises in which children are believed to be employed, and for the keeping by every employer of a running record of all children employed in his factory. Further, in any prosecution under the Ordinance, until the contrary is proved, the person, the subject matter of the charge, is assumed to be a child or under a particular age if he or she so appears to the Magistrate. This last provision meets the difficulty of proof of age, which arises owing to the absence of birth registration.

The special difficulties in the way of the regulation of child labour in the foreign Settlement as they presented themselves to the Commission may be broadly stated as follows:—

1. The absence of a Central Government with power to enforce its decrees throughout the country.

There is no doubt that given such government there would be little difficulty in the way of the Council obtaining the necessary powers to enforce within the Settlement any reasonable industrial legislation enforced outside. In the opinion of the Commission this difficulty is the most serious of all, since it renders it necessary to deal with the Settlement as if it were in the nature of a watertight compartment. Consequently the question as to how far, if at all, it is practicable to regulate or restrict the employment of children within the Settlement, without injuring or unduly interfering with the industries employing them, which industries have to compete with those outside, is one which has to be seriously considered by all those who approach the present problem. In this connexion the Commission invited an expression of opinion from the Cotton Mill Owners' Association of China and the Chinese Cotton Mill Owners Association, and received the following replies:—

From the Cotton Mill Owners' Association of China:—

- (1) *That this Association would welcome regulations limiting the employment of children below a reasonable age, provided these regulations were applicable to and were rigidly enforced in the adjoining provinces of Chekiang and Kiangsu, or even Kiangsu only.*
- (2) *That this Association considers "a reasonable age" referred to in (1) above to be 12 years (foreign count) for the first 2 years, and thereafter 13.*
- (3) *That in the event of no regulations applicable to the surrounding districts being possible this Association would not oppose regulations limiting the age of employment inside the Settlement to 9 years (foreign count).*

**Position in
Hongkong.**

**Shanghai Foreign
Settlement—Special
Difficulties.**

From the Chinese Cotton Mill Owners' Association :—

- (1) *That the Association would welcome regulations prohibiting the employment of children below the full age of 12 provided similar regulations were made applicable and rigidly enforced outside the Settlement limit—say, at least in the provinces of Kiangsu and Chekiang.*
- (2) *a. That the Association would regard the enforcement of prohibition in the Settlement only as an augmentation to the disadvantages already existing at which the mills in the Settlement are working, as the prohibition when enforced would drive away from the Settlement not only all the workers affected but also their parents to obtain work outside, and would result in a shortage of labour in the Settlement where the mills in addition to paying higher taxes and dearer raw cotton than those in the interior would have to pay still higher wages in order to attract labour.*
 - b. That in the opinion of the Association the employment of children by mills is a matter of charitable nature towards the parent workers ; for so long as their children are employed it adds to their income, relieving the burden of supporting their children, and also removes their anxiety for the safety of their children who, from the parents' point of view, are safer and more comfortable in the mills than they would be if left to run wild on the street.*
 - c. That many mills have tried to eliminate small children from employment but they have met with little success owing to the piteful requests by the parents of the children.*

Further, at a meeting held on May 1, 1924, at Shanghai at which, it is stated, a number of labour groups were represented a resolution was passed that there should be no employment of children under fourteen years of age (presumably Chinese count) and that an eight hours system should be worked for.

2. The circumstance that Shanghai is a treaty port and that the foreign Settlement is managed and controlled by a Municipal Council, whose powers are strictly limited by the terms of the Land Regulations and the Bye-laws made thereunder.

By virtue of Bye-law 34 certain occupations can only be carried on under licence from the Council, and there is no doubt that the Council could, under this Bye-law, prohibit or regulate the employment of children in such of these occupations as are obviously unsuitable and harmful to them, but the Commission is advised that such action would have to be justified by the nature of the particular occupation, and that this Bye-law does not empower the Council to prohibit or regulate such employment simply on general humanitarian grounds. Although, apart from this Bye-law, the Council has no present power of prohibiting or regulating the employment of children below any particular age or in any particular industry, the Commission is advised that the necessary power could be obtained by means of a new Bye-law. The Commission is further advised that any such new Bye-law would involve the approval of a majority of the Consuls and Magistrates of the Foreign Powers having treaties with China and the Ratepayers in Special Meeting assembled. Such Foreign Powers and the various countries of which the Ratepayers are respectively citizens, or the great majority of them, are, however, in agreement with the principles of industrial regulation as laid down by the Washington Conference, and it is to be hoped that no difficulty would be experienced by the Council should it endeavour to obtain the powers required to enable it to take the first step towards what can hardly be considered as other than a necessary amelioration of present industrial conditions as far as the employment of children is concerned.

3. Absence of birth registration and the consequent difficulty of proof of the age of children.

It was suggested by certain of the medical witnesses that a height, or height and weight standard, should be fixed for ascertaining age. This suggestion and the alternative method adopted in Hongkong will be dealt with later.

4. Absence of educational facilities.

Before compulsory education was adopted in England this difficulty was met by the half-time system and by requiring the employer to see and prove that any child he desired to employ did in fact attend school, but the Commission is of opinion that the establishment of this system is at present impracticable in the Foreign Settlement.

5. The need for the provision and maintenance of a specially trained Inspectorate.

This could be gradually met, and involves merely the provision of funds and judicious selection, a nucleus of trained persons being obtainable from the countries now having factory legislation.

6. The circumstance that, owing to the present economic and social conditions of China, children are sent to work by their parents at the earliest age possible.

The Commission realises that this is a serious difficulty but it is one that was present in most countries in the early days of factory legislation, and one which must necessarily become less as China progresses industrially.

The problem of the protection of child labour has—whether fortunately or unfortunately—arisen in a concentrated form in the Foreign Settlement of Shanghai, that is to say, in a place where, as shown above, the special and peculiar difficulties in the way of regulation dominate the situation, but, in spite of these difficulties, the Commission is of opinion that the problem is one which must be faced and dealt with as far as is possible.

Peking Provisional Regulations.

In March, 1923, the Peking Government promulgated certain regulations in connexion with labour in factories. These regulations are at present provisional only, and have not the force of law. In his address to the Commission at its first meeting, the then Chairman of the Council expressed the opinion that it would be advisable for the Commission, in recommending any regulations, to take as a basis the regulations above mentioned with a view to securing uniformity within and without the limits of the foreign Settlement. The Commission formed the same opinion and decided to consider these regulations and, in so far as it thought they were reasonably practicable, either as they stood or as they could be amended, to recommend to the Council, in the event of their being enforced at any time outside the Settlement, to seek power to enforce them within the Settlement, and the Commission came to the conclusion that enforcement in the surrounding provinces of Kiangsu and Chekiang, or even in the province of Kiangsu only, would be sufficient enforcement for this purpose.

Peking Provisional Regulations—Commission's Conclusions.

The provisional regulations consist of 28 Sections. Sections 2, 10 to 17 inclusive, 19 and 26 appeared to the Commission to be either outside the scope of its enquiry or, in view of its conclusions, immaterial, and were not further considered. The remaining Sections, as translated into English, and the conclusions arrived at by the Commission are as follows:—

"Section 1. This Order applies to factories under the following heads:—

- a. Factories in which the number of labourers employed is over 100.*
- b. Factories in which work of an extra hazardous character, or which is detrimental to public health, is carried on.*

(Note) A further order will be promulgated in due course with regard to factories in which this Order does not apply."

In the opinion of the Commission the figure 100 is far too high. It is essential that smaller industrial premises should be covered, as there is no doubt that the conditions of labour therein are in some respects much worse than those in the larger and more modern factories. In the opinion of the Commission ten is the most suitable figure. If this figure is adopted Sub-section "b" becomes unnecessary. The expression "factory" requires definition, and the regulations should be made to cover outside work such as building and transport operations.

"Section 3. The proprietor of a factory shall not employ boys under the age of ten or girls under the age of twelve."

The Commission is of opinion that no distinction should be made between the sexes. The age should be first fixed at ten and should then be raised one year every two years until fourteen is reached.

"Section 4. Boys under seventeen and girls under eighteen are regarded as juveniles."

The view of the Commission is that in the absence of a general code of industrial legislation regulation of employment beyond the age of fourteen is at the present moment impracticable.

"Section 5. Juveniles shall be given tasks of an easy and light nature."

This is too vague. The employment of children under fourteen years of age should be forbidden in any dangerous or hazardous place, or at any work likely seriously to injure body or health. In the case of dangerous or hazardous premises there should be power to close the same until made safe.

"Section 6. Juveniles shall not be required to work, exclusive of recesses, for more than eight hours per day, and adults shall not be required to work exclusive of intervals for rest for more than ten hours a day."

In the opinion of the Commission children under the age of fourteen years should not be employed for more than nine hours in any period of 24 hours, or for more than five hours continuously.

"Section 7. Proprietors of factories must not compel juveniles to work between the hours of 8 p.m. and 4 a.m."

In the opinion of the Commission no child under fourteen years of age should be employed on night work, and the night period should be fixed as between the hours of 8 p.m. and 5 a.m.

"Section 8. Not less than two full days in every month shall be granted to adults for rest, and juveniles must be given not less than three days rest every month."

(Note). In emergencies, or in cases of accident, or in times of urgency this rule may be temporarily suspended, but all such cases must be notified to the local authorities within three days from their occurrence."

Every child under fourteen years of age should be given a weekly rest of 24 hours. The Commission does not agree that any suspension of this rule should be allowed.

"Section 9. All labourers must be given not less than one recess each day, and such recesses must be for not less than one hour."

The Commission is of opinion that in the case of children under the age of fourteen the interval of relaxation between any spell of five hours continuous work and the next spell of work should be not less than one hour, and that the interval of relaxation after any spell of work of less than five hours duration should be of reasonable duration, having regard to all the circumstances.

"Section 18. Owners of factories shall provide, at their own expense, suitable educational facilities for their juvenile employes, and also for any of their adult employes who have been thrown out of work."

(Note). *Such free tuition shall be given for not less than ten hours a week for juveniles, and, for adults who have been thrown out of work, free tuition must be given for not less than six hours every week.*"

Whilst the question of the education of children is outside the scope of the Commission's enquiry, it desires to put on record its agreement with the suggestion made by the recent General Education Commission, namely, that the co-operation of mill and factory owners should be sought by the Council for the establishment of educational facilities for :

(a) Children who are too young to go to work in the mills where the parents themselves are at work;

(b) And, if possible, children employed in the mills ; which might be accomplished either by means of night schools, or, in the event of the "half-time" system being introduced as regards children, schools to which this class of children would go as "half-timers," i.e., work in the morning and school in the afternoon and *vice versa* or such other system as may be found practicable.

"Section 21. *Juveniles and women must not be allowed in the engine rooms, or other places where machinery is in motion, for the purpose of scavenging, oiling or for doing repair work, or to do any hazardous work.*"

"Section 22. *Juveniles shall not be ordered to do any work which is connected with the handling of explosives or noxious drugs.*"

"Section 24. *In all factories precautionary measures must be taken against danger to the life and health of employees, and the local authorities have the right to send an officer to make periodical investigations into these matters.*"

"Section 25. *Any factory whose premises and adjoining structures are found by the local authorities to be dangerous to health, or to the public weal, the proprietor of such factory must make the necessary alterations in accordance with the local authorities orders.*

(Note). *With reference to the above, when ordered by the local authorities, the whole or any part of the buildings may be condemned and shall not be used.*"

The matters dealt with by Sections 21 to 25 above-mentioned are covered by the Commission's conclusions under Section 5.

Sections 27 and 28 deal with responsibility for observance and date when the Regulations are to come into force and need not be further considered.

Any Regulations should provide for full power of inspection and the imposition of adequate penalties in case of breach, and the Regulations are defective in this respect. Further, the difficulty of proof of age is not dealt with. As mentioned above this difficulty can be met either :—

- (a) By fixing a standard of height or height and weight, or
- (b) By providing, as in the Hongkong Ordinance, that in any prosecution, until the contrary is proved, the child, the subject matter of the charge, is to be assumed to be under the particular age if he or she so appears to the sitting Magistrate.

The objection to method "a" is that any such standard must of necessity be to a great extent purely artificial and have a considerable margin of error, and its adoption would render it necessary for employers frequently to measure or measure and weigh, as the case might be, a considerable number of their employees. On the other hand, having regard to the different jurisdictions in the Foreign Settlement, the adoption of method "b" might result in the erection of many and diverse standards. On the whole, however, the majority of the Commission is in favour of method "b."

Subject to the Regulations being re-drafted by the Chinese authorities so as substantially to meet the objections and suggestions set out above, the Commission recommends that in the event of their being strictly enforced in the provinces of Kiangsu and Chekiang, or even in the province of Kiangsu only, the Council should seek power to enforce them within the limits of the Foreign Settlement of Shanghai.

The Commission is further of opinion that any real and effective step towards the amelioration of the present conditions of child labour within the practicable limits above indicated, which may be made by the Chinese authorities in the above-mentioned provinces or province, should, if the necessary power can be obtained, forthwith be met by similar action on the part of the Council.

It should here be noted that on May 20, 1924, there was published in the Shun Pao Newspaper an ordinance from the Civil Governor of Kiangsu addressed to the Industrial Bureau which recognised that the Peking Provisional Regulations were imperfect in that they contain no definite provision for inspection, and suggested that China should also organize a Commission to sit at Shanghai with a view to bringing about conformity between any regulations affecting Chinese and Foreign factories.

PART III.

Preliminary Observations.

As there is, however, at the present moment no regulation of labour in any part of China, the Commission, in conclusion, passed to the consideration of the extremely difficult question as to how far, if at all, the Council ought, in view of this circumstance, to attempt to prohibit or regulate child labour within the limits of the Foreign Settlement of Shanghai.

As far as the Commission is aware, the question of the possibility or advisability of prohibition or regulation within one particular industrial area to the exclusion of the rest of the State or country in which the same is situate has hitherto never arisen, and the fact that the Foreign Settlement does not even comprise the whole of the particular industrial area of Shanghai in which it is situate obviously does not lessen the difficulty of the present problem. Many industries within the Settlement have of necessity to compete with similar industries which, whilst situate outside the Settlement, are within the same industrial area, which draw upon the same market for their labour, and which are organised on similar lines.

It is obvious that any action which might have the effect of raising the cost of production within the Settlement would be not only unfair to industries competing with those outside, but would be also unwise from the more general point of view, since it would tend to the subsidization outside the Settlement of the very evils which were being attacked within. Moreover, in certain instances, particularly in the cotton industry, the same concern may have mills and factories both inside and outside the Settlement, and any regulation which did not take into account this circumstance, and the difficulties which obviously might arise therefrom, would be most unsatisfactory. Further, the probability that prohibition or regulation within the Settlement, unless very carefully conceived, would merely result in the driving of the children and their parents into the employment of entirely uncontrolled industries outside, must always be borne in mind. Again, owing to the present economic and social conditions in China any immediate drastic prohibition of the employment of children would be in the nature of a revolution and would seriously impoverish many homes. Lastly, the fact that there is in China at present no system of education for children of the working classes must not be lost sight of. In all countries hitherto the history of early industrial regulation has also been the history of early elementary education. The provision of means for the education of the children has grown up side by side with the prohibition or other regulation of their employment.

Commission's Conclusions and Recommendations.

It was only after a very careful and lengthy consideration of the factors set out above that the Commission arrived at their conclusions upon this difficult and serious problem, and it desires to put on record that its recommendations are to be considered as conditioned by these factors, and that, in its opinion, the standard to be aimed at and to be adopted at the earliest practicable moment is that set up by the Washington Conference.

The Commission's conclusions and recommendations are as follows :—

Minimum age.

1.—The Commission is of opinion that it is practicable to prohibit within the Settlement limits the employment of children under the age of ten years, rising to twelve years within a period of four years. The Commission is satisfied that such prohibition will not cause financial injury or serious inconvenience to any industry. The evidence given before the Commission was such as to drive it to the conclusion that, if the continued existence of any particular industry were dependent upon the continuance of the employment of children under ten years of age, then the disappearance of such industry from the Foreign Settlement could be regarded with equanimity. In the event of such prohibition, the problem of the education of unemployed young children will naturally become more serious, but the Commission hopes that at the same time the solution of this problem will be thereby hastened.

The Commission recommends that the Council should forthwith seek power to make and enforce regulations prohibiting the employment in factories and industrial undertakings of children under ten years of age, rising to twelve years within four years from the date when the regulations come into force.

Hours of Employment.

2.—The question of the regulation of the hours of the employment of children is, in view of the existing circumstances, one of considerable difficulty. Whilst there is no doubt that in China neither children nor adults work at the same pressure as in Western countries, the Commission is satisfied that the hours worked in many industries by children under fourteen years of age are so excessive as seriously to effect their health, and can and should be lessened. In normal times many of the important industrial concerns in the Settlement which employ children work on the two twelve-hour shift system, and the Commission is satisfied that a limitation of the hours of employment of children to a length of time less than the normal length of the shift would have the result of preventing the employment of such children in such industries even by day, and the Commission is of opinion that any regulation, which would have this result, would be both unfair to the particular concerns and unwise from a more general point of view. The Commission is, however, satisfied that there is no good reason why during the course of the shifts an interval of one hour for food and rest should not be allowed and made compulsory.

The Commission recommends that the Council should seek power to prohibit the employment in factories and industrial undertakings of children under fourteen years of age for a longer period than twelve hours in any period of twenty-four hours, such period of twelve hours to include a compulsory rest of one hour.

3.—While it cannot be disputed that night work for young children is highly injurious, the Commission reluctantly came to the conclusion that it is impracticable immediately to prohibit night work for children within the limits of the Foreign Settlement while there is no limitation outside. Industries at present employing labour at night are mostly those organised upon the two-shift system, and the Commission is satisfied that it would be commercially impracticable for such industries to employ children by day, if they could not also employ such children on the turn of the shift at night. Moreover, the result of such prohibition might be that children who were just over the age fixed would be employed continuously at night which, in the opinion of the Commission, would be very undesirable. If the recommendation contained in paragraph 1 above is acted upon, the result will be that in four years time there will be no child under twelve years of age permitted to be employed either by day or by night within the limits of the Foreign Settlement, a result which will constitute a far-reaching improvement on the present conditions, and which will, it is hoped, be merely a step towards the attainment of a position similar to that reached by the Western countries.

Night work.

In view of the above, the Commission does not recommend that the Council should immediately seek power to enforce the prohibition of employment at night of children who can be employed by day. The Commission, however, considers night work for young children such a serious evil that it is of opinion that this question should in any event be further considered by the Council at the end of a period of four years.

4.—As regards the question of a rest day, the Commission is of opinion that, as a step towards the standard set up at the Washington Conference of one whole day's rest in every seven days, it would be practicable to make it compulsory for children under fourteen years of age employed in the Settlement to be given at least one day's rest in every fourteen days. That is the position at the present moment in Japan. In practically all the large mills and factories the employees get a day's rest consisting of twenty to twenty-four hours every seven days, but employment is probably more continuous in many of the smaller native industries.

Rest day.

The Commission recommends that the Council should seek power to make and enforce regulations under which every child under fourteen years of age, employed in factories and industrial undertakings in the Settlement, should be given twenty-four hours continuous rest from work in at least every fourteen days.

5.—The Commission sees no reason why it should not be the legal duty of every employer to see that the children employed by him are not exposed to serious risk. Any regulations made under this head should cover risk of injury from dangerous unguarded machinery and from fire owing to lack of proper means of egress or otherwise, and also danger of injury to health, the result of insanitary conditions.

Protection against Injury.

The Commission recommends that the Council should seek power to prohibit the employment of children under fourteen years of age in factories and industrial undertakings at any dangerous unguarded machine, in any dangerous or hazardous place, or at any work likely seriously to injure body or health, and to close any dangerous or hazardous premises where such children are employed until they are made safe.

6.—As regards proof of age, this difficulty can be met as stated above either (a) by fixing a standard of height, or height and weight, or (b) providing, as in the Hongkong Ordinance, that in any prosecution, until the contrary is proved, the child, the subject matter of the charge, is to be assumed to be under the particular age if he or she so appears to the sitting Magistrate.

Proof of Age.

Whilst the majority of the Commission is in favour of method (b), the Commission recommends that the Council should adopt whichever of these two methods is the more suitable from an administrative point of view.

7.—It will be necessary for any regulations to contain a definition of the expressions "factory" and "industrial undertaking" respectively, or of such other terms as may be used therein to describe the employments covered. In the opinion of the Commission it is essential that the smaller native industries and the building, transport, and similar out-of-door occupations should be brought within any regulations.

Definitions.

The Commission recommends that :—

- (a) The expression "factory" should be defined so as to cover premises in which ten or more persons are employed in manual work.
- (b) The expression "industrial undertaking" should be defined so as to cover out-of-door occupations, such as building, construction work, and transport, but should not include any agricultural undertaking.

8.—It cannot be too often stated that the successful enforcement of any regulations must depend to a great extent upon the imposition of adequate punishment in case of breach, and upon frequent inspection by trained men and women.

Inspection and Penalties.

The Commission recommends that :—

- (a) Any regulations should provide for the imposition not only of substantial fines but also, in case of repeated wilful offences, for punishment by imprisonment.
- (b) The Council should provide an adequate staff of trained men and women for carrying out the duties of inspection under the regulations.

**Concluding
Observations.**

The Commission fully realises the weight of the burden which the Council will take upon its shoulders, if, having first obtained the necessary power, it acts upon the Commission's recommendations. Few people outside the Settlement appreciate or even attempt to understand the difficult and peculiar nature of the task performed by the Council, with its strictly limited powers in the administration of the densely and diversely populated area within its jurisdiction. Reform of present industrial conditions and the consequent amelioration of the lot of the Chinese child worker cannot be achieved unless it receives the moral and active support not only of the foreign residents, but of the vastly greater body of the Chinese public.

Dated the ninth day of July, 1924.

H. LIPSON WARD, *Chairman, Barrister-at-law.*

ADELAIDE M. ANDERSON, D.B.E., *Formerly H.B.M. Principal Lady Inspector of Factories.*

J. S. S. COOPER, M.A., B.Sc., *Vice-Chairman, Director, ARNHOLD & Co., LTD.*

EDWIN J. CORNFOOT, *Silk Merchant, DYCE & Co.*

MARY A. DINGMAN, *Industrial Secretary, World's Y. W. C. A. Allocated to China 1924-5.*

R. J. McNICOL, *Manager of Messrs. Jardine, Matheson, & Co., Ltd. Cotton Mills Department, Shanghai, and Chairman of the Cotton Millowners' Association of China.*

G. OKADA, *Manager, Naigai Wata Kaisha.*

MAYLING SOONG, *Secretary of Joint Committee of Women's Clubs in Shanghai.*

MARY STONE, M.D.

The original membership of the Commission was as follows:—

Messrs. J. S. S. Cooper, E. J. Cornfoot, R. J. McNicol, H. Y. Moh, G. Okada, H. Lipson Ward, Mrs. D. MacGillivray, Miss Agatha Harrison, Miss Mayling Soong, Dr. Mary Stone.

Mr. H. Lipson Ward was appointed Chairman of the Commission and presided at all its meetings.

Mr. J. S. S. Cooper was appointed Vice-Chairman.

Miss Agatha Harrison resigned from the Commission on her departure from China in January, 1924, and Miss Dingman was appointed by the Council in her stead.

Dame Adelaide Anderson, with the approval of the Council, was co-opted a member of the Commission on December 7, 1923.

Mrs. MacGillivray left for England on a holiday at the beginning of May, 1924, having first approved a considerable part of the Report as then in draft, and it is hoped that she will sign the completed Report on her return.

Dr. Mary Stone was able to attend only a few meetings of the Commission but signs this Report.

Mr. Moh attended certain of the earlier meetings of the Commission, but owing to his departure and continued absence from Shanghai it is not known whether or not he is in approval with this Report.

APPENDIX No. I.

List of Mills and Factories in the Shanghai Foreign Settlement, and Chapei and Pootung, showing Nationality and Number of Adults and Children Employed.

N. B.—The figures given were found to be approximate only and in some instances inaccurate. In certain cases, particularly with reference to silk filatures, the nationality given is no doubt merely that of a foreign nominee, lending his name for the purpose of obtaining foreign registration. The evidence given before the Commission was to the effect that there was little, if any, foreign capital invested in silk filatures.

HARBIN ROAD DISTRICT.

Name and Address.	Nationality.	No. of Male Employees over 12 years of age	No. of Female Employees over 12 years of age	No. of Male Employees under 12 years of age	No. of Female Employees under 12 years of age
Yui Ching Silk Filature, 1 Wuchow Road ..	Chinese	—	500	—	—
Tung Wei Silk Filature, 1 Wuchow Road ..	"	—	500	—	—
Yui Foong Silk Filature, 2 Wuchow Road ..	"	—	580	—	—
Ching Yung Silk Filature, 399 Chaoufoong Road ..	"	120	200	—	3
Tien Chong Silk Filature (now called Ziang Woo Silk Filature), 80 Tung Chow Road ..	"	—	150	—	—
Chung Yih Tinfoil Factory, 1009A Wuchow Road ..	"	80	60	—	—
Yui Lung Cotton Thread Factory, 1010 Wuchow Road ..	"	15	10	—	—
Tsung Mai Tinfoil Factory, 398 Wuchow Road ..	"	74	168	—	—
Shanghai Building Co.'s Saw Mill, 9 Thorne Road ..	American	175	—	—	—
Shanghai Ice & Cold Storage Co., Ltd., Works, 8 Thorne Road ..	British	40	—	—	—
B. A. T. Cigarette Factory, 56 Dixwell Road ..	"	200	380	—	—
Tsok An Stocking Factory, 1045/8 E. Yuhang Road ..	Portuguese	75	80	—	—
Woo Tseu Tinfoil Factory, 890E. Yuhang Road..	Chinese	40	100	—	—
Lou Zung Kee Cigar Factory, 787 E. Yuhang Road ..	"	7	54	—	—
Shanghai Tinfoil Factory, 1009A Wuchow Road ..	"	100	170	—	80
Fong Yuen Carpet Factory, 243 Juikin Road ..	"	150	—	—	—
Yah Kee Glass Factory, 81 Juikin Road ..	Japanese	140	—	—	—
Yah Zung Safe Factory, 404 Urga Road ..	Chinese	90	—	—	—
J. F. Woodworth Engineering Works, 1045 E. Yuhang Road ..	American	25	—	—	—
Zung Hyung Cotton Ginning Mill, 302/7 Hailar Road ..	Chinese	30	44	—	—
Van Hyung Iron Founders, 273 Hailar Road ..	"	26	—	—	—
Yah Yoong Iron Founders, 272 Hailar Road ..	"	21	—	—	—
Ziang Fah Iron Founders, 272 Hailar Road ..	"	50	—	—	—
Mo Nyoen Zung Engineering Works, 271 Hailar Road ..	"	34	—	—	—
Hyung Tai Iron Founders, 270 Hailar Road ..	"	25	—	—	—
Hwa Tung Engineering & Electric Works, 738 Dixwell Road ..	"	63	—	—	—
Yoong Tai Iron Founders, 169 East Yuhang Road ..	"	35	—	—	—
Yah Woo Cotton Thread Factory, 268 Hailar Road ..	"	23	14	—	—
Yah Woo Cotton Thread Factory, 258 Hailar Road ..	"	22	16	—	—
Ts Jung Engineering Works, 401 Chaoufoong Road ..	"	38	—	—	—
Foh Chong Engineering Works, 401 Chaoufoong Road ..	"	16	—	—	—
Tuh Chong Engineering Works, 44 Tungchow Rd. ..	"	10	—	—	—
Yah Chong Ziang Engineering Works, 222 Tungchow Road ..	"	13	—	—	—
Hyung Yueh Engineering Works, 47 Yochow Rd. ..	"	20	—	—	—
Hwa Chong Electric & Engineering Works, 295 Sawgin Road ..	"	12	—	—	—
The Asiatic Rubber Factory, 296 Mukden Road..	Japanese	14	10	—	—
Yoong Chong Iron Foundry, 156 Tung Sah Ka ..	Chinese	16	—	—	—
Kyung Tsaung Engineering Works, 1074/5 Sawgin Road ..	"	12	—	—	—
Foong Tai Engineering Works, 1031 Sawgin Road ..	"	30	—	—	—
Kung Lee Engineering Works, 123 Sawgin Road ..	"	12	—	—	—
Tsing Yih Engineering Works, 10 Sawgin Road..	"	8	—	—	—
Yi Tai Engineering Works, 1289 Sawgin Road ..	"	14	—	—	—
Yuen Chong Engineering Works, 13 East Yuhang Road ..	"	97	—	—	—
Zung Ts Sing Engineering Works, 3158 Point Rd. ..	"	13	—	—	—
Lee Da Engineering Works, 411 Point Road ..	"	21	—	—	—
Ing Yoong Zung Iron Foundry, 412 Point Road..	"	11	—	—	—
Kyung Chong Iron Works, 3093 Point Road ..	"	36	—	—	—
Da Sung Engineering Works, 3091 Point Road ..	"	9	—	—	—

HARBIN ROAD DISTRICT.

Name and Address.	Nationality.	No. of Male Employees over 12 years of age	No. of Female Employees over 12 years of age	No. of Male Employees under 12 years of age	No. of Female Employees under 12 years of age
Zen Chong Zung Engineering Works, 3023 Point Road	Chinese	22	—	—	—
Wong Yuen Kee Iron Foundry, 280 Point Road..	"	14	—	—	—
Kawakita Co., 167 East Yalu Road	Japanese	23	—	—	—
Tsing Kung Engineering Works, 141/5 East Yalu Road	Chinese	24	—	—	—
Chang Lui Engineering Works, 798 East Yalu Rd.	"	34	—	—	—
Hyung Kee Iron Foundry, 799 East Yalu Road..	"	29	—	—	—
Zen Chong Ziang Iron Foundry, 1185 Wuchow Rd.	"	22	—	—	—
The Shanghai Zeh Zeh Sin Wen Zo (Printing Dept.), 10 Wuchow Road	Japanese	66	—	—	—
Zung Fok Chong Engineering Works, 560 Sinkeepang Road	Chinese	22	—	—	—
Tsang Meu Chong Engineering Works, 424 Sinkeepang Road	"	17	—	—	—
Yah Tai Chong Iron Foundry, 288 Urga Road ..	"	22	—	—	—
Hoong Tai Engineering Works, 167 Urga Road ..	"	12	—	—	—
Hang Hyung Chong Iron Founders, 149 Urga Rd.	"	50	—	—	—
Nyoen Hyung Chong Engineering Works, 163/4 Urga Road	"	20	—	—	—
Van Tai Engineering Works, 352 Urga Road ..	"	15	—	—	—
Kyeu Da Engineering Works, 406 Urga Road ..	"	16	—	—	—
Hoong Hyung Engineering Works, 407 Urga Rd.	"	17	—	—	—
Zung Ping Kee Engineering Works, 409 Urga Rd.	"	39	—	—	—
Hyung Chong Engineering Works, 477 Urga Rd.	"	28	—	—	—
Tai Chong Iron Foundry, 460 Urga Road ..	"	22	—	—	—
Kung Sing Chong Engineering Works, 488 Urga Road	"	14	—	—	—
Yoeh Hyung Kee Engineering Works, 491 Urga Road	"	10	—	—	—
Foh Chong Ziang Engineering Works, 4 Urga Rd.	"	18	—	—	—
Kung Zung Chong Iron Foundry, 490 Urga Road	"	19	—	—	—
Zuh Sing Printing Co., 247 Urga Road.. ..	"	38	—	—	—

WAYSIDE DISTRICT.

Liddell Bros., Ltd., 29 Yangtsepoo Road ..	British	80	400	—	—
Pao Yuen Paper Factory, 32 Yangtsepoo Road	Chinese	120	4	—	—
Oriental Cotton Mill, 36 Yangtsepoo Road ..	British	560	1,350	110	—
New Engineering Works, 37-45 Yangtsepoo Rd.	"	1,570	—	—	—
Laou Kung Mow Cotton Mill, 40 Yangtsepoo Rd.	"	300	1,100	300	250
Tsing Chong Ziang Engineering Works, 609 Point Road	Chinese	40	—	—	—
Yah Zung Iron Works, 610 Point Road ..	"	34	—	—	—
Wu Zung Shing Iron Works, 633 Point Road ..	"	30	—	—	—
Tuh Tai Engineering Works, 734 Point Road ..	"	80	—	—	—
Wah Sun Electrical Engineering Works, 2861 Point Road	"	90	—	—	—
Yah Lee Iron Works, 2863 Point Road.. ..	"	42	—	—	—
Ching Wei Cotton Mill, 31 Yochow Road.. ..	"	110	270	—	—
Ching Yen Silk Godown, 121 Yochow Road ..	"	38	—	—	—
Tsung Tong Engineering Works, 148 Yochow Rd.	"	35	—	—	—
Zung Wu Iron Works, 214 Yochow Road ..	"	50	—	—	—
Ching Wah Lead-foil, 219 Yochow Road.. ..	"	150	450	—	—
Foh Lee Hat Maker, 230 Yochow Road.. ..	"	12	10	—	—
Tuh Sing Engineering Works, 256/7 Yochow Rd.	"	42	—	—	—
Yuen Chong Lead-foil Factory, 280 Yochow Road	"	60	130	—	—
Nie Lee Printing Co., 281/2 Yochow Road ..	"	90	—	—	—
Hop Lee Iron Works, 31/2 Yuenfong Road ..	"	23	—	—	—
Ling Bei Kee Iron Works, 34 Yuenfong Road ..	"	34	—	—	—
Hop Chong Iron Works, 74 Yuenfong Road ..	"	38	—	—	—
Kung Yih Yah Kee Engineering Works, 1206 Sinkeepang Road	"	20	—	—	—
Scott, Harding & Co., 1338 Sinkeepang Road ..	British	15	—	—	—
Van Chong Engineering Works, 13 Hwakee Road	Chinese	60	—	—	—
Sing A Lee Engineering Works, 95/6/7 Hwakee Road	"	28	—	—	—
Kwan Tai Kee Boat Coolies, 721 Hwakee Road..	"	90	—	—	—
Van Zung Yah Kee Engineering Works, 642 & 723 Hwakee Road	"	29	—	—	—
Ward Printing Co., 63 Kungping Road.. ..	"	36	—	—	—
Tai Shing Iron Works, 145 Kungping Road ..	Japanese	15	—	—	—

WAYSIDE DISTRICT:

Name and Address.	Nationality.	No. of Male Employees over 12 years of age	No. of Female Employees over 12 years of age	No. of Male Employees under 12 years of age	No. of Female Employees under 12 years of age
Dah Loong Iron Works, 2 Dalny Road..	Chinese	198	—	—	—
Sze Tuh Shing Box Maker, 7/8 Chusan Road ..	"	30	—	8	—
Tsing Yih Cotton Factory, 400 McGregor Road..	"	12	5	5	—
Zung Wah Iron Works, 401 McGregor Road ..	"	47	—	—	—
Nanyang Bros. Tobacco Co., 299 Broadway ..	"	1,530	3400	—	—
Kwan Chong Iron Works, 639 Broadway ..	"	40	—	20	—
Tsang Yung Yuen Engineering Works, 1288 East Seward Road ..	"	22	—	—	—
Yah Tai Engineering Works, 24 Kwenming Road ..	"	30	—	—	—
Yung Shing Ziang Iron Works, 24 Kwenming Rd.	"	20	—	—	—
Mei Chong Sing Engineering Works, 195 Kwenming Road ..	"	20	—	—	—
Yah Dah Engineering Works, 250 Kwenming Rd.	"	35	—	—	—
Tsung Wah Twine Maker, 251 Kwenming Road..	"	60	50	—	—
An Tai Engineering Works, 252 Kwenming Road ..	"	30	—	—	—
Yah Shing Engineering Works, 252 Kwenming Rd.	"	26	—	—	—
Central Printing Co., 39 Tongshan Road..	"	80	6	—	—
Fuh Zung Engineering Works, 202 Tongshan Rd.	"	25	—	—	—
Zeu Chong Ziang Engineering Works, 1006 Tongshan Road ..	"	23	—	—	—
Darh Foong Dyeing Works, 1741 Tongshan Road ..	"	140	—	—	—
Sing Ming Engineering Works, 1741A Tongshan Road ..	"	40	—	—	—
Fah Shing Ziang Engineering Works, 1742 Tongshan Road ..	"	20	—	—	—
Van Waa Silk Factory, 1844 Tongshan Road ..	"	250	150	—	—
Yuen Chong Tai Iron Works, 1948 Tongshan Rd.	"	20	—	—	—
Sih Chong Match Factory, 2010 Tongshan Road ..	"	130	150	—	60
Way Chong Engineering Works, 24 East Yuhang Road ..	"	80	—	—	—
Zeu Foong Weaving Factory, 149 East Yuhang Road ..	"	—	15	—	—
Yuen Chong Tai Iron Works, 682 East Yuhang Road ..	"	30	—	—	—
Sih Chong Iron Works, 684 East Yuhang Road..	"	30	—	—	—
Dee Yih Carpet Factory, 689 East Yuhang Road ..	"	150	150	—	—
Mei Suh Cotton Factory, 729 East Yuhang Road ..	"	20	20	—	—
Asiatic Engineering Co., 120 East Yuhang Road ..	American	60	—	—	—
Ito Tobacco Factory, 88 Wayside Road..	Japanese	60	70	—	—
Tsung Loong Iron Works, 484 Wayside Road..	Chinese	38	—	—	—
Wah Tai Engineering Works, 485 Wayside Road ..	"	30	—	—	—
British & American Publishing Co., 82 Baikai Rd.	British	360	—	—	—
Kiu Wah Hosiery, 1480 Baikai Road..	Chinese	20	50	—	—
Yuen Nyih Tobacco Co., 1549 Baikai Road ..	"	20	10	—	—
Loh Sih Kai Ice Factory, 67 Ward Road ..	"	20	—	—	—
China Tobacco Co., 69 Ward Road ..	"	80	200	—	—
Sincere's Factory, 70 Ward Road ..	"	180	40	—	—
Trollope & Colls, Ltd., 70 Ward Road..	British	24	—	—	—
American Tobacco Co., 50 Yulin Road ..	American	310	270	—	—
Sung Kee Engineering Works, 300 Yulin Road..	Chinese	60	—	—	—

YANGTSZEPOO DISTRICT.

Ewo Cotton Spinning & Weaving Co., 46 Yangtszepoo Road ..	British	1,450	4,160	150	40
Heng Foong Cotton Mill, 1 Whashing Road ..	Chinese	500	1,850	200	400
Yangtszepoo Cotton Mill, 1 Wetmore Road ..	British	650	2,450	400	300
Shanghai Cotton Manufacturing Co., No. 1, 68 Yangtszepoo Road ..	Japanese	632	1,990	18	10
Shanghai Cotton Manufacturing Co., No. 2, 90 Yangtszepoo Road ..	"	528	1,437	22	13
Shanghai Cotton Manufacturing Co., No. 3, 90 Yangtszepoo Road ..	"	1,050	3,200	—	—
Yuen Lung Cotton Mill, 71 Yangtszepoo Road..	"	110	86	—	—
Eastern Engineering & Shipbuilding Works, 65/66 Yangtszepoo Road ..	"	300	—	—	—
Kong Shing Iron Foundry, 3272 Yangtszepoo Rd.	"	100	—	—	—
San Tsing Lumber Co., 900 Yangtszepoo Road ..	"	100	—	—	—
China Offset Printing Co., 4 Tsitsihar Road ..	"	150	—	—	—
Pao Shing Tinfoil Factory, 7 Thorburn Road ..	Chinese	100	—	—	—
Japanese Brass Foundry, 700 Thorburn Road ..	Japanese	100	—	—	—
Japanese Cigarette Factory, 700 Thorburn Road ..	"	100	150	—	—

YANGTSZEPPOO DISTRICT.

Name and Address.	Nationality.	No. of Male Employees over 12 years of age	No. of Female Employees over 12 years of age	No. of Male Employees under 12 years of age	No. of Female Employees under 12 years of age
Kong Tai Hosiery Factory, 76 Ward Road ..	Japanese	100	100	—	—
San Sing Cotton Mill, 87 Yangtszepoo Road ..	Chinese	1,378	3,531	70	360
Hou Sung Cotton Mill, 22 Lay Road	"	540	1,800	100	100
Wei Tung Cotton Mill, 12 Lay Road	"	500	900	80	100
Toong Wo Cotton Mill, 87 Ward Road.. ..	Japanese	225	2,100	75	500
Pioneer Knitting Factory, 1050 Rangoon Road..	Chinese	104	536	16	64
Wing On Cotton Mill, 10 Seoul Road	"	180	1,400	20	400
Kung Dah Cotton Mill, Pingliang Road.. ..	"	337	930	23	370
Dah Kong Cotton Mill, 2 Tengyueh Road.. ..	Japanese	753	1,496	20	150
Yui Foong Cotton Mill, 98 Yangtszepoo Road..	"	400	120	60	520
S. Behr & Mathew, 77 Yangtszepoo Road ..	British	200	110	—	—
Chang Shing Loong Iron Foundry, 487 Pingliang Road	Chinese	30	—	—	—
Dong Shing No. 2 Mill, 90A Yangtszepoo Road..	Japanese	630	1,008	—	—
Amos Bird & Co., 1 Tengyueh Road	American	140	400	—	—
Mai Wah Hosiery Mill, 17 Haichow Road ..	Chinese	240	15	—	—
Kung Gin Iron Foundry, 53 Linching Road ..	"	70	—	—	—
Chingyuan Mill, 299 Tanyang Road	"	60	24	—	—

GORDON ROAD AND BUBBLING WELL DISTRICTS.

Chang Foong Flour Mill, 4 Ichang Road.. ..	Chinese	150	—	—	—
Foh Sing Flour Mill, 5 W. Soochow Road.. ..	"	480	—	—	—
Foo Foong Flour Mill, 25 Mokanshan Road ..	"	400	—	—	—
Hong Chang Weaving Factory, 53 Markham Road	"	250	950	50	50
Hong Chang Cotton Mill, 53 Markham Road ..	"	300	480	—	—
Hung Yue Cotton Mill, 55 Markham Road	"	600	1,700	100	200
Doong Shing Cotton Mill, 181 Gordon Road ..	Japanese	650	1,300	50	100
Japanese Cotton Mill, Nos. 3 & 4, 19 W. Soochow Road	"	1,400	1,350	100	150
Japanese Cotton Mill, Nos. 5, 7 & 8, 14 W. Soochow Road	"	1,020	2,762	80	180
Japanese Cotton Mill, No. 9, 60 Markham Road ..	"	1,000	1,950	—	50
Pao Zung Cotton Mill, Nos. 1 & 2 Robison Road	Chinese	1,137	977	122	100
Poo Yih Cotton Mill, 37 W. Soochow Road	"	250	350	50	100
Sung Sing Cotton Mill, No. 1 Brenan Road	"	700	3,000	100	200
Sung Sing Cotton Mill, No. 2, 2 Ichang Road ..	"	650	1,540	20	30
Tung Yih Cotton Mill, 10 Mokanshan Road ..	"	1,170	2,300	30	100
Toyoda Cotton Spinning & Weaving Co., 200 Jessfield Road, O. O. L.	Japanese	500	3,300	50	150
Shanghai Silk Spinning Co., 138 Jessfield Road, O. O. L.	Chinese	973	715	15	24
Sing Chang Silk Filature, 161 Jessfield Road, O. O. L.	"	—	1,400	—	100
Tsung Hwa Kung Yih Lace Mill, Z 400 Brenan Road	"	410	110	40	20
Tien Lung Silk Filature, 40 Ferry Road.. ..	Chinese	70	—	—	—
Hemp Sack Factory, 64 Robison Road	Japanese	300	550	100	50
Kung Yih Cotton Mill, 150 Robison Road	British	400	1,350	100	150
Japan-China Spinning & Weaving Co., 98 Robison Road	Japanese	622	1,333	80	120
Japanese Cotton Mill, No. 12, 14 W. Soochow Rd.	"	384	300	—	—
Japanese Cotton Mill, No. 13 & 14, 62 Robison Rd.	"	568	1,494	—	—
Japanese Cotton Mill, No. 15, 146 Gordon Road..	"	177	422	—	—
Sung Tuh Lace Factory, 999 Ferry Road	Chinese	245	120	—	—
Zung Tsong Silk Filature, 32 Connaught Road..	"	—	360	—	30
Ting Kee Silk Filature, 32 Connaught Road ..	"	—	300	—	30
Price Candle Factory, 3 Robison Road	British	400	—	—	—
Arts & Crafts Factory, 85 Kiaochow Road ..	"	700	—	—	—
American Manufacturing Factory, 15 Robison Rd.	American	450	—	—	—
Shanghai Brewery, 40 Gordon Road	Swedish	50	—	—	—
Edison Electric Factory, Robison Road	American	800	—	—	—

WEST HONGKEW DISTRICT.

Mei Ching Silk Filature, 51 N. Soochow Road ..	Italian	40	460	40	540
Say Hwa Silk Filature, 42 N. Chekiang Road ..	British	20	500	200	720
Yung Foong Silk Filature, 88 Kansuh Road	"	50	250	150	450
Yung Tai Silk Filature, 1 Tsepoo Road.. ..	Italian	80	900	200	1,180
Yung Yui Silk Filature, 5 Winchester Road ..	French	60	630	170	860
Yui Foong Silk Filature, 1 Alabaster Road	Italian	30	500	200	730
Yung Yui Silk Filature, 15 Dong Ka Loong ..	French	75	798	202	1,075

Name and Address.	Nationality.	No. of Male Employees over 12 years of age	No. of Female Employees over 12 years of age	No. of Male Employees under 12 years of age	No. of Female Employees under 12 years of age
WEST HONGKEW DISTRICT.					
Yung Kong Silk Filature, 51 N. Soochow Road..	British	9	228	92	329
Jen Foong Silk Filature, 1 Alabaster Road ..	"	7	200	50	300
Luen Ziang Silk Filature, 54 N. Soochow Road..	"	8	210	60	290
Zu Shing Silk Filature, 54 N. Soochow Road ..	Chinese	10	250	90	320
SINZA DISTRICT.					
Foong Tah Silk Filature, 9 N. Chengtu Road ..	Chinese	15	820	—	10
Tai Kong Silk Filature, 9A N. Chengtu Road ..	"	14	660	—	10
Zung Shing Silk Filature, 15 N. Chengtu Road ..	Italian	14	700	—	10
Foh Sing Flour Mill, 17 N. Chengtu Road ..	Chinese	200	—	—	—
Toong Dah Silk Filature, 5 Markham Road ..	"	15	712	—	20
Wei Fong Silk Filature, 5 Markham Road ..	"	18	580	—	10
Ewo Silk Filature, 5 N. Chengtu Road ..	British	30	1,000	—	30
HONGKEW DISTRICT.					
Zen Lung Silk Filature, 25 Miller Road..	Chinese	100	1,700	—	200
Sino-Belgian Tobacco Co., 1176 Woosung Road..	Belgian	20	30	—	—
Ching Lung Underwear Factory, 284 Dixwell Rd.	Chinese	30	220	—	—
CENTRAL DISTRICT.					
Liddell Bros Packing & Sorting Godowns, 12 Foochow Road	British	150	500	—	—
McKenzie & Co., 7 Canton Road..	"	300	500	—	—
CHAPEI DISTRICT.					
Yung Zung Silk Filature, 524 Tiendong Road ..	American	20	450	—	150
Yung Zung Silk Filature, 1870 Tiendong Road ..	"	20	450	—	150
Doong Foong Yoong Silk Filature, 408 Tiendong Road	Italian	20	300	—	150
Tien Chong Silk Filature, 312 Fung Sz Miao ..	Chinese	20	450	—	150
Zang Nyoen Silk Filature, 399 Veh Wo Road ..	American	20	600	—	200
Toong Yuh Silk Filature, 244 Veh Wo Road ..	"	20	650	—	250
Ching Chong Silk Filature, 276 Veh Wo Road ..	"	20	300	—	100
Veh Wo Silk Filature, 276 Veh Wo Road..	"	20	600	—	250
Tsing Zung Silk Filature, 38 Hung Foong Road..	Chinese	36	550	—	100
Lien Yuh Silk Filature, 38 Hung Foong Road ..	British	40	600	—	130
Hsu Chong Fok Silk Filature, 294 Hung Foong Rd.	Chinese	27	500	—	100
Yah Foong Silk Filature, 293 Hung Foong Road	"	22	380	—	150
Hung Chong Silk Filature, 293 Hung Foong Road	"	20	367	—	143
Pah Sz No. 1 Silk Filature, 55 Kwang Fok Road..	French	50	502	—	102
Pah Sz No. 2 Silk Filature, 68 Kwang Fok Road..	"	12	250	—	90
Yah Ou Silk Filature	British	35	360	—	140
Da Zung Silk Filature, 45 Kweng Fok Road ..	Chinese	24	340	—	120
Hung Tai Koong Silk Filature, 312 Chang An Rd.	"	26	350	—	130
Hsu Chong Zen Silk Filature, 189 Chang An Road	French	22	480	—	100
Nyoen Nyoen Silk Filature, 220 Chang An Road	Chinese	34	350	—	200
Hsun Chong Silk Filature, 220 Chang An Road..	"	36	480	—	200
Zoen Foong Silk Filature, 19 Chang An Road ..	"	42	510	—	110
Chung Wo Yoong Silk Filature, 19 Chang An Rd.	"	45	530	—	110
Tien Lai Silk Filature, 33 Koong Woo Road ..	"	40	373	—	124
Da Lai Silk Filature, 33 Koong Woo Road ..	"	31	400	—	100
Kyung Foong Silk Filature, 4 Wo Zung Road ..	Italian	22	180	—	70
Tsung Da Silk Filature, 4 Wo Zung Road ..	Chinese	30	170	—	80
Yoong Nyoen Zung Silk Filature, 4 Wo Zung Rd.	"	28	200	—	100
Hsu Chong Yoong Silk Filature, 1 Nai Mei Yuen Road	"	23	520	—	130
Da Lung Silk Filature, 152 Wong Ka Zah, Jukong Road	"	30	300	—	100
Hsun Lee Silk Filature, 9 Manchuria Road ..	"	29	480	—	120
Yu Kong Zung Silk Filature, 9 Manchuria Road	"	25	500	—	120
Yuin Yui Silk Filature, 209 Wong Pang Jao, Paoshan Road	"	42	600	—	200
Tsung Shen Silk Filature, 92 Wong Pang Jao, Paoshan Road	"	34	320	—	80
Kiu Kyung Silk Filature, 16 Tientoong An Road	"	20	300	—	80
Tuh Shen Silk Filature, 10 Tientoong An Road..	"	20	420	—	100
Yu Foong Silk Filature, 170 Koo Ka Wai ..	British	16	270	—	80
Hung Loong Silk Filature..	Italian	17	420	—	90
POOTUNG DISTRICT.					
Nikka Cotton Mill	Japanese	784	2,442	—	—
B. A. T. (Old Factory)	Brit. & Amer.	874	1,805	180	84
B. A. T. (New Factory)	"	791	2,022	67	234

APPENDIX No. II.

MEMORANDUM ON THE FACTORY SYSTEM AND ORIGIN AND HISTORY
OF FACTORY LEGISLATION.

(BY DAME ADELAIDE M. ANDERSON).

1. *The Factory System*:—In order to understand the meaning of the rise and nearly world-wide development of Factory Law in the Nineteenth Century and first quarter of the Twentieth Century, one must know something of the economic and social upheaval in Western Europe that accompanied the transition from ancient, handicraft manufacture to mass-production with the aid of mechanical power, under the Factory System. The practical necessity of a common rule for securing and maintaining a civilized standard of life for human labour in modern industrialised production was learned only gradually in Western industrial countries. Experience and public recognition of the evils and abuses that came with the system,—specially affecting young child labourers and women—led to the beginnings of a system of protective law. Later the evils which arose from a one-sided use of mechanical inventions were seen to be both avoidable and also inimical to the efficiency of all labour in unregulated factories.

For ages mankind in East and West alike had continued to work with tools and appliances that had mainly been invented in the dawn of civilization and that can still be seen anywhere in the streets and lanes of Chinese cities and villages. The great, revolutionary change from the domestic workshop system to the factory system sprang from a tendency of mankind to develop tools into machines, in order to meet a rapidly increasing demand coming from widespread markets. It was made possible on the great scale of the Nineteenth Century through scientific discovery, and its application to new ways of using coal and iron, developing rapid transport, and the application and transmission of mechanical power in secondary industries.

This change first arose, in fact, in the thriving domestic cotton manufacture of Lancashire, England, which already before the middle of the Seventeenth Century was exporting largely to India and elsewhere from Manchester, Bolton and their neighbourhoods, via Liverpool, Bristol and London. Lancashire, with its capable workers and manufacturers and humid climate, had also at hand, first the water power of its hills and valleys needed for driving the relatively simple machinery of the early factories, and, secondly, the coal and iron needed to complete the transformation of its ancient looms and spinning wheels into costly power-driven mechanical machinery.

And so, in the second half of the Eighteenth Century (within the reign of Ch'ien Lung in China), began the factory method of production, based on specially produced power and costly plant, which was to spread first to other textile industries and finally to most non-textile industries, and onward to many other countries. Ultimately, within a century it was nearly to compass the globe, and to revolutionize the economic and social relations of employers and employed and of nations with each other, even before China had largely entered on this way of manufacture.

Things moved so rapidly in the original field of the change that the importance of the welfare of the manual workers to the nation as much as to the individual workers, unorganized and helpless, was almost forgotten. Applied science in the factory stopped short at the aim of a high technique of mechanical production and the profits necessary to carry on the large scale industries. And the modern manufacturer's view* that it is labour and not machinery that is the "Economic fundamental" had not come in sight. The idea of a science and technique of labour management or of the economic and social value of methodical prevention of industrial fatigue, or of constructive methods of promoting conditions for welfare inside the factory, had yet to be conceived. The results of this blind, mechanical move onward, were so tragic for the little children who so largely were drawn in at the foundation of the factory system that the English nation, awakened by outbreaks of epidemic illness among the children, was moved to take action. Under the guidance of Pioneers of Public Health such as Dr. Percival and Dr. Ferrier, called into consultation by Justices of the Peace, new ways were tried for securing their health, safety, and protection from insanitary condition, excessive hours, night work, lack of rest pauses, holidays, or of any education to replace loss of homelife and training for industrial skill and citizenship.

The factory system in China is relatively as yet a recent growth of not more than about twenty years within this country with the most ancient and still generally prevalent handicraft production; yet already the evils everywhere found to arise where the factory system of industry grows up without appropriate national regulation have appeared, and are certain to grow unless efficiently regulated. Such evils are: actual overstrain and injury to life, health and limb of workers, adult and youthful, but especially to very young workers† through excessively long hours without pauses, through nightwork, injurious dusts, poisonous substances, humidity, extremes of heat and cold; dangerous unguarded machinery, rapid crowding into towns without good housing, with consequent ill-effect on family life, and break down of ancient village customs of local government and hygiene; strain on expectant and nursing mothers and on young, adolescent girls and boys, the future parents of the nation; break up of the old guild system and lack of social and economic protection for unorganized and unrepresented workers where personal and fraternal relations of employer and employed are quickly changing into impersonal relations.

It is essential, especially in a country where ancient industry has continued down into modern days on the handicraft basis, and young children widely help their parents and guardians in the small workplaces, to grasp firmly and understand the difference in conditions and the kind and degree of strain involved. Otherwise, the urgency of the need for regulation of modern industry may not be understood. Therefore let us sum up some of the main differences between a system of:

- (a) Domestic handicraft industry,
- (b) Factory industry.

*See Henry Ford "My Life and Work". First Australian Edition, 1923, Sydney, Angus and Robertson, Ltd. 1923-Page 9.

†See "China Medical Journal," March 1924, article by H. W. Decker, M.D., on Industrial Hospital, Shanghai; Review of 880 cases from the cotton mills. Here much helpful light is thrown on the high relative mortality-rate from accidents to children and on the difficulty of safeguarding them from accident; the high permanent disability rate among them from accident, and the relatively high tuberculosis rate among the children.

In (a), handicraft industry, the production is on a small scale ; it is a matter of individuals or families, or small groups of handicraftsmen, and generally the aims of production are rather to supply local needs in families, villages and cities, than a world-wide demand;—to secure quality rather than quantity of output. The tools and appliances used generally are to secure quality of production and having been early brought to perfection have changed very slowly during long periods of time. The problems of health and safety of the handicraft workers are simple and very similar to those of other ordinary working citizens or village neighbours. Thus there are not great fire risks, nor great risks from dangerous machinery or injurious dusts or large quantities of poisonous substances ; nor of serious overcrowding or extreme insanitation. And the margin of production over local needs being small there is little temptation for employers to employ workers for long spells of night work or excessively long and continuous hours of close attention to work without sufficient pauses for meals and rest. Children can, ordinarily, only be usefully employed in accordance with their natural physical capacity and adults according to their powers of developing their physical capacity. Evils do arise, but not on the scale that they do in factory production.

(b) The factory system on the other hand has hitherto been largely developed to secure rapid large output, or "mass production," to meet a wider demand or national and international needs with the aid of power-driven machinery and costly plant. It is essential to secure early profits in order to maintain this plant and machinery in sound working condition or renew or develop them as knowledge increases and give a return on capital expended as well as sufficient reward for good management. Processes are subdivided and so far simplified as to make the strain of monotonous attention to the working of a machine, at the pace set by the engine, more fatiguing, especially for very young workers who need to exercise rapid movements of attention and change of position (as in play) in order to grow healthfully and naturally. And the very simplification of processes made employment of young workers and women, away from home and family life, more profitable to the manufacturer. In Domestic handicraft work children's labour is simply used as an aid to labour of parents or guardians. In the early factory system it is largely the foundation of the industry, while parents losing their old manual trades were driven to send their children into the factories. The first stages in the break-up of old handicraft production and Guild methods of organization have everywhere made the workers less able to protect themselves and to bargain for good conditions until slowly they could build up modern Trade Unions. Scientific development of new processes and machinery has greatly increased the mechanical and chemical risks of accidents and injury to health, life and limb of workers. And manufacturers generally, apart from exceptional leaders among them, competing with each other for profits, have not moved to set safe and healthful limits to hours of working their machinery until compelled to do so. Thus Factory Law and Inspection has sprung up in countries of the West and South and Southeast after they developed the Factory System : in Europe first, then America, Australia, New Zealand, South Africa.

2—*Origin and History of Factory Law* :—Under the circumstances above briefly indicated the modern factory system of industry first actually began and got established in England where a great world-wide demand for practically unlimited supplies of cotton cloth stimulated invention of a series of mechanical appliances for spinning and weaving, and in 1785 led to the application of the power of Watt's steam engine in a cotton mill. Development of mechanical transport hastened the extension of the new industrial organization gradually into the majority of manufactures in the United Kingdom. Many injurious conditions grew up in one industry after another, such as can be seen growing now in China for children and young workers. In China, also, can now be heard expression of many of the difficulties standing in the way of regulating and reforming the conditions that were expressed in the early Nineteenth Century in the country of origin of the laws. Yet in the United Kingdom they were gradually met and overcome, as they were later in France and Germany. China has the advantage of their long experience of the great benefits that come through taking care of the workers in the factories, first through national standards and, much later, through international conventions.

Even before the application of the principle of Watts' steam engine the overcrowding of the cotton mills and the employment of gangs of Poor Law children (under Poor Law Guardians, i.e., under state care) for excessive hours on alternate night and day shifts, under insanitary conditions, drew public attention to the evils. These children were taken over by employers by contract from the Poor Law Guardians. Outbreaks of infectious fever arose in the mills, where these apprentices were then usually lodged. Representations were made in 1784 to Justices of the Peace at Radcliffe who recognized responsibility and who immediately appointed a medical commission of enquiry. Their recommendations were printed and published and acted upon so far as they could be by these magistrates. Action was first taken by Parliament on behalf of these Poor Law children in the passing of the "Health and Morals of Apprentices Act" in 1802 which regulated hours and conditions and required education of apprentices. In 1819 another Act regulated conditions for free child labour, forbidding entry of a child under nine full years. Employment of young persons and women grew. Adult workers began to organize, and, under the leadership of enlightened manufacturers (e.g., Robert Owen, John Fielden) and other citizens, at great meetings, in petitions to Parliament, pressed for the passing of Acts for limiting hours to ten a day, forbidding night work, and raising age of entry of children. In 1831 night work for persons under 12 years in cotton factories was prohibited and daily hours for those up to 18 years of age were limited to 12 hours. In 1833 inspectors were provided for and appointed by Government to enforce obedience of employers to the Factory Acts. As the inspectors were able and just men, instructed to report faithfully what they saw, they did probably more than any other persons to help in the development of sound and practicable legislation for the necessary protection of factory workers that went on in the United Kingdom throughout the Nineteenth Century. In 1893 women were first appointed as factory inspectors with full inspectors' powers and their numbers gradually increased as their practical power to protect the women workers (whose hours were limited from 1844 onwards) was realized by the Government. In 1896 medical inspectors were added and greatly helped to secure improved conditions of health for all the workers. From the year 1833 the age of the children had to be determined by their physical examination by certifying physicians, but after 1837 registration of births made it easier to secure that no child under the legal age was employed in a factory. The age of entry was gradually raised by Acts, successively to 10, 11, and in 1901 to 12 years. From the year 1844 only half-time employment of children under 14 years was allowed, between 6 a.m. and 6 p.m. or 7 a.m. and 7 p.m., in factories and workshops. The employers were bound to prove that any child they employed went regularly to school either on the plan of morning and afternoon sets or alternate day sets. At first many of them set up the requisite schools but, later, compulsory free education was provided by the nation for all. From 1919 onwards the age limit was raised to 14 years and half-time employment of children came to an end.

From the year 1895 onwards all cases of industrial poisoning had to be reported to the chief inspector by medical practitioners all over the United Kingdom of Great Britain and Ireland (lead, phosphorus, mercury,

arsenic, anthrax, etc.) and gradually the statistics of such cases of poisoning were sufficient for the building up of effectual special regulations to prevent such injury. Phosphorus necrosis, from the use of white phosphorus in lucifer match-making, proved to be quite unpreventable by special regulations. International conferences organized by voluntary associations for comparative study of Labour Legislation gained adherents to the idea of concerted action among the Governments for international suppression of night work for women and other protective measures already adopted in the United Kingdom. Conventions were agreed on for prohibiting such night work and use of white phosphorus; and in 1908 the White Phosphorus Act came in the United Kingdom as an important fruit of these International Conferences. It prohibited the use in lucifer match making of the dangerous white phosphorus (and the importation of matches so made) which had everywhere entailed occurrence of one of the worst of industrial diseases. This prohibition was at the same time similarly enacted in Denmark, France, Germany, Italy, Luxemburg and Switzerland. Thus began the International Labour regulation for which labour and social reformers had hoped and worked during nearly a century and which came to wider fruit under the League of Nations in 1919.

For nearly eighty years in the United Kingdom a general law for the health and safety of factory workers with regular and shortening hours, definite pauses for meals and holidays and Sunday rest had been slowly built up and steadily applied; and similarly (rather later) in France as the factory system grew there also. Germany followed much later, both in development of factories and of factory law in the second half of the nineteenth century. In that country important new ideas were brought into action in national health and other social insurance, which were later, in turn, adopted by England and France.

During the Great War of 1914 to 1918 much was learned as regards the social, national and international value of the manual workers' services in factory production. In 1916 the British Parliament passed, without opposition and with excellent effects, legislation making provision for conditions to "secure the welfare of the workers" in any class of factories, or an individual factory, in such matters as arrangements for preparing and taking meals, supply of protective clothing; ambulance and first aid arrangements; facilities for washing and accommodation for clothing; arrangements for supervision of the welfare of the workers, rest-rooms, and other similar matters to be added if needed. This law also provided for participation of the workers in management of the welfare arrangements, and Joint Industrial Councils of Employers and Employed, which had for long existed and promoted peaceful settlement of disputes in the cotton trade, grew up in various other industries, with encouragement from the Government.

III.—International Conventions for Fair and Humane Conditions of Labour.—While protective law for health and safety, compensation for accidents and injury, and various forms of social insurance were being built up, together with the Trade Union organization of workers and Associations of Employers, under influence of an increasingly humane public sentiment, the habit of International Congresses, to consider international relations and needs, was also growing up in the Nineteenth Century. Workers migrated in Europe, and all the industrial countries could see the mutual need of interchange of compensation benefits and similar standards in hours, health and safety to prevent unfair competition, as well as the need of prevention of night work for women and young workers and the dangerous trades regulations in 1908, already mentioned.

A new epoch was opened, after the Great War, when the Peace Treaty expressly recognized the need of including the international promotion of better conditions of labour in the activities of the League of Nations. The removal of sources of unrest through hardship and injustice to the great masses of labour was seen to be necessary for the peace of the world. And so International Organizations for Labour Legislation, and for maintaining records and for supporting research into promotion of health and safety, were made part of the machinery of the League of Nations. Briefly stated, this machinery includes:—

(1) A general conference of the representatives or delegations from the States members, with power to make conventions regarding labour which become operative in the separate states only after legislation to that effect has been passed by each nation concerned. The Conference which is under a governing body meets annually. The first conference took place, and the first conventions were debated and agreed to—special arrangements being provided for Eastern nations—at Washington, U. S. A., in 1919. The delegations by Treaty obligation include representative employers and employed as well as government delegates, the central government in each state being responsible for ensuring that the delegates are fully representative.

(2) An International Labour Office under a director and deputy director assisted by a Cabinet which acts as a general secretariat co-ordinating all the work of the office in its various departments, including scientific research into health and safety of workers, statistics, and comparative legislation, and library division. Here is a great centre for guidance of all nations with trustworthy information, open to all: address, Geneva, Switzerland. At the Conference held at Washington in October, 1919, various Conventions were drawn up and adopted.

The purport of these Conventions, so far as concerns the immediate purpose, or falls within the terms of reference, of this Commission on Child Labour regarding the Foreign Settlement of Shanghai, is already sufficiently indicated in the Report above.

As regards methods of inspection and enforcing factory law it is of interest to note here that the whole time of the Annual Conference at Geneva in 1923 was taken up with discussion of these fundamental questions.

In the Western industrial countries, as appears above, it was long ago found that without precisely defined penalties, and a trained, expert inspectorate, with absolute right of entry into factories and workshops, the important requirements of Factory Law could not be generally and equally carried into effect. It was in the United Kingdom that this method was first tried and then developed into an institution. It was found there and in other countries that carefully chosen, able and impartial Government inspectors had great value for guidance of manufacturers, workers, public opinion, and for Governments. It has done much towards securing peace and understanding between employers and workers. Where the inspectors find serious neglect or refusal to obey the law they are empowered to prosecute the offender in a court of Summary Jurisdiction and any penalties under the law go into the National Treasury. Methods of prosecuting vary in the different countries but the principle is the same, in that the penalty for neglect or evasion can be enforced and that the law is set in motion by an impartial trained and trustworthy official appointed by the Government and ultimately supported by the public opinion of the nation.

IV.—Factory Legislation in younger Industrial Countries outside Europe and Asia.—In this rapid summary only few and slight indications can be given of the conditions and standards of Factory Regulation in these younger industrial countries, where, until the time of the War, they were more engaged on primary

industries, pastoral, agricultural, etc., than on factory industries. This does not of course apply to America, where we have the largest industrialized state outside Europe, most like the United Kingdom in modern development.

All the countries within the British Commonwealth of Nations had already Factory Acts and Inspectorates established before the beginning of the International Labour Organizations of 1919, and had in some respects, *e.g.*, age of entry for children, hours of work, new experiments in methods of wage regulation, made some advances on the standards of the Mother Country. The separate States of Australia legislate independently of each other, as they did before the Federal Union was formed, but on the whole even while their industries were in their infancy, the average legal requirement was equal to British requirements. New Zealand is smaller industrially, except as regards various Milk Products, but has similar standards, and now is also making interesting developments in vocational training through regulated apprenticeship. South African law is particularly interesting because the two white races, British and Dutch, are numerically small (about one and a half million), and most manual work is carried on by native Bantu races, Indian coolie labour and mixed coloured labour (about five and a half million together). The Factory Act requirements are substantially the same as in the United Kingdom, relatively to the as yet small development of factory industry, and modern welfare arrangements for workers are being established under able guidance from the Government Factory Inspectors.

The United States of America had little old tradition from handicraft industry, such as the United Kingdom had when it began the factory system, and (as later in Australia), the matter of factory law is the responsibility of the separate States. Thus each State makes its own child labour laws, the degree of industrial development is unequal, and it is difficult to make any brief, precise statement. There is, however, a Federal Children's Bureau which collects information for the United States Federal Government and there is a strong movement for obtaining a Federal Law to regulate children's labour conditions throughout the States. In every State there is a compulsory school attendance law and children cannot be employed during school hours. There is reported to be much outwork dependent on the factory system in some States in America, with long hours and young child labour. In all but three States there is a standard age of 14 years or over for entry into factories and for various other employments. In four of the States the age is 15 years, and in two it is 16 years. In two of the States there is no limit fixed and in one a boy may enter at 12 years. In certain States there are exemptions which apply only to hours outside school hours.

Factory law and administration have thus advanced fairly equally throughout the world outside China, and this advance has certainly aided development of sound industry. Further advance may be expected when scientific research into industrial fatigue prevention and promotion of positive health is more widely understood and respected. It is already clear that long hours and poor conditions are a heavy drag on industrial output for any Nation.

Note.—Gradually, powers adequate for inspectors of factories to carry out their responsible and confidential duties were built up by law in the United Kingdom. Section 119 of the Factory and Workshop Act of 1901 defines the executive powers as follows:—

“(1) An inspector shall for the purpose of the execution of this Act have power to do all or any of the following things, namely:

(a) To enter, inspect and examine at all reasonable times, by day and night, a factory and a workshop and every part thereof, when he has reasonable cause to believe that any person is employed therein, and to enter by day any place which he has reasonable cause to believe to be a factory or workshop; and

(b) To take with him in either case a constable into a factory or workshop in which he has reasonable cause to apprehend any serious obstruction in the execution of his duty; and

(c) To require the production of the registers, certificates, notices, and documents kept in pursuance of this Act and to inspect, examine, and copy the same; and

(d) To make such examination and enquiry (these need not be made only at the factory: see *Squire v. Sweeney*, 34 *Irish Law Times*, 1900, 26) as may be necessary to ascertain whether the enactments for the time being in force relating to public health and the enactments of this Act are complied with, so far as respects the factory or workshop and the persons employed therein; and

(e) To enter any school in which he has reasonable cause to believe that children employed in a factory or workshop are for the time being educated; and

(f) To examine, either alone or in the presence of any other person, as he thinks fit, with respect to matters under this Act, every person whom he finds in a factory or workshop or such school as aforesaid or whom he has reasonable cause to believe to be or to have been within the preceding two months employed in a factory or workshop and to require every such person to be so examined and to sign a declaration of the truth of the matters respecting which he is so examined; and

(g) To exercise such other powers as may be necessary for carrying this Act into effect.

(2) The occupier of every factory and workshop, his agents and servants, shall furnish the means required by an inspector as necessary for an entry, inspection, examination, inquiry, or the exercise of his powers under this Act in relation to that factory or workshop.

By Section 127 of the same Act, every person must within one month after he begins to occupy a factory or workshop serve notice, giving prescribed particulars, on the factory inspector for the district.

By Section 129, there must be kept in every factory and workshop a general register giving prescribed particulars about the children and young persons there employed, about lime washing, reportable accidents, and other matters.

APPENDIX No. III.

INDUSTRIAL EMPLOYMENT OF CHILDREN.

HONGKONG

No. 22 of 1922.

I assent to this Ordinance,

CLAUD SEVERN,

Officer Administering the Government.

September 29, 1922.

An Ordinance to regulate the employment of children in certain industries.

January 1, 1923.

Be it enacted by the Governor of Hongkong, with the advice and consent of the Legislative Council thereof, as follows:—

Short title.

1.—This Ordinance may be cited as the Industrial Employment of Children Ordinance, 1922.

Interpretation.

2.—In this Ordinance:—

- (1) "child" means a person under the age of 15 years;
- (2) "dangerous trade" means any trade or occupation whatsoever which is declared by regulation made under this Ordinance to be a dangerous trade;
- (3) "factory" means any premises wherein or within the close or curtilage or precincts of which any manual labour is exercised by way of trade or for purposes of gain in or incidental to making any article, or part of any article, or altering, repairing, ornamenting, finishing, or adapting for sale any article, provided that at least ten persons are employed in manual labour in the said premises and the close, curtilage and precincts thereof;
- (4) "industrial undertaking" includes:—
 - (a) mines, quarries and other works for the extraction of minerals from the earth;
 - (b) industries in which articles are manufactured, altered, cleaned, repaired, ornamented, finished, adapted for sale, broken up or demolished, or in which materials are transformed, including shipbuilding, and the generation, transformation, and transmission of electricity and motive power of any kind;
 - (c) construction, reconstruction, maintenance, repair, alteration, or demolition of any building, railway, tramway, harbour, dock, pier, canal, inland waterway, road, tunnel, bridge, viaduct, sewer, drain, well, telegraphic or telephonic installation, electrical undertaking, gaswork, or other work of construction, as well as the preparation for or laying the foundations of any such work or structure;
 - (d) transport of passengers or goods by road or rail or inland waterway, including the handling of goods at docks, quays, wharves, and ware-houses, and the carriage of coal and building material and debris;

But does not include any agricultural operation.

- (5) "Inspector" means any person appointed by the Governor to be an Inspector of Juvenile Labour for the purposes of this Ordinance;
- (6) "Protector" means any person appointed by the Governor to be the Protector of Juvenile Labour for the purposes of this Ordinance.

Regulations.

3.—(1). It shall be lawful for the Governor in Council to make regulations for any of the following purposes:—

- (1) declaring what trades and occupations are to be deemed to be dangerous trades for the purposes of this Ordinance;
- (2) prescribing the ages under which children shall not be employed in particular trades or occupations;
- (3) prescribing the conditions under which children may be employed in industrial undertakings;
- (4) imposing obligations upon persons who employ children in industrial undertakings, and on the servants of such persons;
- (5) defining the duties and powers of the protector and the inspectors;
- (6) exempting any industrial undertaking or factories from the operation of the Ordinance or any part thereof;
- (7) generally, for the purpose of carrying into effect the provisions of this Ordinance.

(2) All regulations made under this Ordinance shall be laid on the table of the Legislative Council at the first meeting thereof held after the publication in the Gazette of the making of such regulations and if a resolution be passed at the first meeting of the Legislative Council held after such regulations have been laid on the table of the said Council resolving that any such regulation shall be rescinded or amended in any manner whatsoever, the said regulation shall without prejudice to anything done thereunder, be deemed to be rescinded or amended as the case may be, as from the date of publication in the Gazette of the passing of such resolution.

1 Edw. 7 c. 22,
s. 143.

10 and 11 Geo.
5, c. 65 Schedule.

(3). The regulations in the Schedule shall be deemed to have been made under Ordinance, and shall be in force until rescinded or amended by regulations made under this Ordinance.

4.—(1). It shall be lawful for the Protector, and for any person authorized thereto in writing by the Protector, and for any inspector, to enter and search any place in which he may have reason to believe that any child is being employed in an industrial undertaking, and to seize anything which may appear to be evidence of any offence against this Ordinance.

Search and enquiries.

(2). Every person who employs or has employed any child in an industrial undertaking, and every servant of any such employer, shall on demand give to the Protector, or to any inspector, all information in his possession with reference to such child, and all information in his possession with reference to the labour conditions and treatment of any children employed by such employer.

5.—In any prosecution under this Ordinance :—

Presumptions.

(a) if it appears to the magistrate that any person who is alleged in the charge to have been a child at the date of the alleged offence was a child at such date, it shall be presumed, until the contrary is proved, that such person was a child at such date;

(b) if it appears to the magistrate that any child, who is alleged in the charge to have been under any particular age at the date of the alleged offence, was under that particular age at the said date, it shall be presumed, until the contrary is proved, that the said child was under the said age at the said date.

6.—Every person who contravenes or attempts to contravene or fails to comply with any of the provisions of this Ordinance or of any of the regulations made thereunder shall be liable upon summary conviction to a fine not exceeding two hundred and fifty dollars and imprisonment for any term not exceeding six months.

Penalties.

7.—No prosecution under this Ordinance shall be commenced without the consent of the Protector.

Consent.

8.—This Ordinance shall come into force on the 1st day of January, 1923.

Commencement.

Passed the Legislative Council of Hongkong, this 28th day of September, 1922.

A. DYER BALL,

Clerk of Councils.

Assented to by His Excellency the Officer Administering the Government, the 29th day of September, 1922.

A. G. M. FLETCHER,

Colonial Secretary.

SCHEDULE

REGULATIONS.

1. The following are declared to be dangerous trades :—

Boiler chipping.
Fireworks, the manufacture of
Glass making.

2. No person shall employ any child in any dangerous trade.

3. No person shall employ any child under the age of 10 years in any factory.

4. No person shall employ any child under the age of 12 years in carrying coal or building material or *débris*.

5. (1) The owner and the manager of every factory in which children are employed shall cause to be kept, in English or Chinese, a running record of all the children at any time employed in such factory.

(2) Such record shall contain the following particulars :—

- (a) name of factory ;
- (b) address of factory ;
- (c) name of employer or employers ;
- (d) name of manager of factory ;
- (e) name of child ;
- (f) sex of child ;
- (g) date of birth of child, or, if date cannot be ascertained, estimated age on some given date ;
- (h) address of child ;
- (i) name of parent or guardian ;
- (j) nature of employment ;
- (k) actual hours of work for every day on which the child is employed ;

(3) Every such record shall be entered up promptly and accurately.

6. No child shall be allowed to work in any industrial undertaking for more than 9 hours in any period of 24 hours.

7. No child shall be allowed to work in any industrial undertaking for more than 5 hours continuously.

8. In any industrial undertaking the interval of relaxation between any spell of 5 hours continuous work and the next spell of work shall be not less than one hour, and the interval of relaxation after any spell of work of less than 5 hours duration shall be of reasonable duration having regard to all the circumstances.

9. Every child employed in any industrial undertaking shall be allowed one day's rest in every seven days.

10. No child shall be employed in any industrial undertaking between the hours of 7 p.m. and 7 a.m.

11. No child shall be allowed to carry any weight which is unreasonably heavy having regard to the child's age and physical development, and no child whatever shall be allowed to carry any load exceeding 40 catties in weight.

APPENDIX No. IV.

CHINESE GOVERNMENT PROVISIONAL REGULATIONS.

An Order in re Child Labour, promulgated by the Ministry of Agriculture and Commerce on March 29, 1923.

1. This Order applies to factories under the following heads :—

(a.) Factories in which the number of labourers employed is over 100.

(b.) Factories in which work of an extra-hazardous character, or which is detrimental to public health is carried on.

Note.—A further Order will be promulgated in due course with regard to factories in which this Order does not apply.

2. All factories established by foreigners in accordance with the preceding clause, and which are within the jurisdiction of the Chinese authorities, must also abide by this Order.
3. The proprietor of a factory shall not employ boys under the age of 10, nor girls under the age of 12.
4. Boys under 17 and girls under 18 are regarded as juveniles.
5. Juveniles shall be given tasks of an easy and light nature.
6. Juveniles shall not be required to work, exclusive of recesses, for more than 8 hours per day, and adults shall not be required to work, exclusive of intervals for rest, for more than 10 hours a day.
7. Proprietors of factories must not compel juveniles to work between the hours of 8 p.m. and 4 a.m.
8. Not less than two full days in every month shall be granted to adults for rest, and juveniles must be given not less than three full days rest every month.

Note.—In emergencies, or in case of accident, or in times of urgency, this rule may be temporarily suspended, but all such cases must be reported to the local authorities within 3 days of their occurrence.

9. All labourers must be given not less than one recess each day, and such recesses must be for not less than one hour.
10. In factories where both day and night work is carried on the shifts of workmen must be changed not less than once every ten days.
11. Wages shall be paid in the local currency, and payment in kind must not be made without the consent of the employee.
12. A definite pay-day must be fixed, and wages must be paid not less than once each month.
13. In special cases when the working hours must be prolonged, factory proprietors must make reasonable compensation for such overtime.
14. Owners of factories shall not make any deduction from the wages of their employees as security against breach of the rules of the factory, nor for any damage that may be caused by them.
15. If any savings scheme is proposed for the benefit of the employes the owner of the factory shall not retain any portion of his employe's wages without first obtaining their consent, and any proposals for a savings scheme must first be submitted to the local authorities for approval.
16. Any employee who resigns, or in case of the death of an employee, the owner of the factory of such employee must pay the full amount of wages due to the employee, if he resigns, or to his relatives in case of death ; also the full amount of the savings deposits remaining to the credit of such employee must be paid.
17. According to the conditions and circumstances of his factory, the proprietor must make provision for gratuities and rewards and he must first submit his proposals to the local authorities for approval.
18. Owners of factories shall provide, at their own expense, suitable educational facilities for their juvenile employees, also for any of their adult employees who have been thrown out of work.

Note.—Such free tuition shall be given for not less than 10 hours every week for juveniles, and for adults who have been thrown out of work, free tuition must be given for not less than six hours every week.

19. In case of injury to, or of illness of employees, the owner of the factory must either limit the working hours of the employee or suspend them altogether, in his own discretion, but in the case of those who have been injured, or of those who become ill while employed in the factory, the proprietor must pay all of their medical expenses, and he must not deduct anything from their wages during the period of the illness of such employees.
20. Female employees must be given leave five weeks before and five weeks after accouchement, and they must also be given a suitable amount of money.
21. Juveniles and women must not be allowed in the engine rooms, or other places where machinery is in motion, for the purpose of scavenging, oiling, or for doing repair work, or to do any hazardous work.
22. Juveniles shall not be ordered to do any work which is connected with the handling of explosives or of noxious drugs.
23. Juveniles must not be employed in any place which is detrimental to health, or where dust and/or powder is flying about.
24. In all factories precautionary measures must be taken against danger to the life and health of employees, and the local authorities have the right to send an officer to make periodical investigations into these matters.
25. Any factory whose premises and adjoining structures found by the local authorities to be dangerous to health, or to the public weal, the proprietor of such factory must make the necessary alterations, in accordance with the local authorities orders.

Note.—With reference to the above, when ordered by the local authorities, the whole or any part of the buildings may be condemned, and shall not be used.

26. The proprietor of a factory may engage any suitable person as manager of his factory, but the appointment must be reported to the local authorities.
27. Owners of factories shall be held responsible for the observance of the provisions of this order.
28. This order comes into force on the day of promulgation.