

whether the injury was wrongful or unjustified. This is a question that is resolved by the judiciary on a case-by-case basis. Germany has the most restrictive approach to strict liability as a result of its rights-based approach to tort law. The list of rights set out in the German legislation does not include financial interests. This restriction has been ameliorated in part by judicial interpretation which has included some aspects of financial interests. The mainstay of economic loss claims in Germany remains with contract law which has an expansive approach both in terms of implied terms and lowering of the privity barrier.

Chapter 7 sets out the law on causation. In France, causation rules for tort law are developed by the courts based on legislation on causation for contract law which limits damages “to the direct and immediate consequences of the breach of contract” (at 178). Italian law does have legislation dealing with causation in tort cases, and is broadly similar to French law. The legislation expressly provides for contributory negligence and joint and several liability. Germany also has a statutory framework dealing with causation in tort law. The authors demonstrate that all jurisdictions adopt a similar approach, dealing with causation in fact and causation in law. The final chapter deals with products liability.

This book is an easy read and sets out the various positions clearly with some comparative analysis and critique. Its structure could have been improved by having two parts – one on general principles and one on specific examples. Thus, causation could have been dealt with early, immediately after the chapter on standard of care. The treatment of the duty of care was scant and that is unfortunate as the duty question is perhaps the most intriguing. There was some repetition and overlap between the chapters that could have been avoided, freeing up space for more in-depth analysis. The theoretical framework set out in Chapter 1 was not fully utilized in the comparative analysis, thus taking away from the richness of the analysis. These are minor quibbles. I believe the book will be of interest to scholars and students who wish to learn more about tort law in common law and civil law jurisdictions.

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Criminal Law in Singapore BY STANLEY YEO, NEIL MORGAN AND CHAN WING CHEONG [Singapore: LexisNexis, 2022. lxxxii + 1056 pp. Softcover: S\$267.05. eBook: S\$213.64]

This work is essentially an update of the authors’ earlier three editions of *Criminal Law in Malaysia and Singapore* (2007, 2012, 2018) but with one crucial difference. This latest monograph deals only with Singapore, and no longer pairs it with Malaysia. One may justifiably wonder why this separation has taken 57 years more than the political event which created the two independent jurisdictions in 1965. There are two ways of regarding this phenomenon. First, one can attribute this to the near universality and timelessness of the original Indian Penal Code which both Singapore and Malaysia inherited during the days of Empire. Notwithstanding progressively growing divergences in the political, social, cultural and economic

contexts between the two jurisdictions, the Penal Code continued to serve both jurisdictions just as well as before. On the other hand, one can lament the failure in both jurisdictions to reform and update the Code for modern times, leaving judges with the unenviable task of pouring new wine in old bottles. Whilst Malaysia has certainly enacted amendments to its Code, it is in Singapore that we have seen a more concerted and comprehensive programme to renovate the Code, culminating in what are perhaps the most substantial reforms in its history in the great amendments of 2019, following upon the rather more modest set of reforms in 2007. The Criminal Law Reform Act 2019 (Act 15 of 2019) was the tipping point and the prospect of a fourth edition encompassing both jurisdictions began to look unwieldy. Thus, was born a new monograph on Singapore alone, and hopefully the first of more editions to come.

Any textbook worth its salt will be able to organise and describe what the law is – the relevant statutory provisions, the extra-statutory material and the cases which have interpreted them. Better ones offer a critique of the law as it stands, either on grounds of principle or policy, or both. The best go on to propose alternative provisions which will better serve the ends of the criminal law. *Criminal Law in Singapore* is firmly in this last category. Indeed, the reform proposals found in the earlier three editions have obviously spurred and informed the 2019 amendments. This latest work continues in this admirable tradition of critiquing and proposing reforms to improve the law. The law reformer's work is never done and the authors are keenly aware of this.

The best way to assess a book is to read it yourself. But it is often illuminating to ask who it is who has purported to write the book. On this score, the authors reveal a remarkable length and depth of experience with the criminal law of Singapore. Professors Yeo and Morgan taught criminal law at the National University of Singapore in the 1980s. Both published in criminal law. Professor Morgan was part of an earlier trio who jointly authored, with Professors KL Koh and Christopher Clarkson, *Criminal Law in Singapore and Malaysia: Text and Materials* (1989). Professor Chan has taught and published widely in criminal law since the early 1990s. This work of the three is essentially the distillation of the wisdom of three lifetimes of study and thought on the criminal law of Singapore. The combination of precision, conciseness and authority which is readily evident in the text bears testimony to this.

It was a fascinating and rewarding task to try to detect the distinct styles of the three authors and to unravel how they have each brought their individual geniuses to bear on the chapters they take primary responsibility for. The division of labour is mentioned in the Preface. It is unnecessary to talk about each and every chapter. I will instead identify particular examples of what each author is capable of. Professor Morgan's introductory Chapters 1 ("The Criminal Law: Context, Sources and History") and 2 ("The Criminal Process, Harm and Punishment") are a masterly performance of harmony between breadth and brevity. They deal with matters which, though not directly about the substantive law, are essential to an educated understanding of the legal material. Each one of the sections within the chapters really deserves a chapter or even a book of its own, and it is to the great credit of Professor Morgan that he has managed to organise and express these big ideas so clearly and concisely. It does the critical task of presenting just enough

to those who would be specialists in, say, legal history, constitutionalism or the criminal process to work on. Professor Yeo's forte is Criminal Defences (Chapters 16–32), a topic which he has written extensively about in jurisdictions (apart from Singapore) as varied as Malaysia, Australia, India, Myanmar, Sri Lanka and Bhutan. Professor Yeo's chapters bear the marks of this multi-jurisdictional expertise. They are comparativism writ large. One other signature of his writing could perhaps be attributed to his lifelong dedication to his role as an educator of the criminal law. One gets the impression on reading his chapters of a patient and thorough teacher explaining each and every nuance of the law in a step-by-step and unhurried manner. Professor Chan, the relative youngster in this company, sweeps up the rest of the chapters. His particular skill is his lean and to-the-point prose, which stands him in good stead for topics which students and the uninitiated tend to consider "difficult" such as Causation (Chapter 5), The Concurrence Principle (Chapter 6), Abetment and Criminal Conspiracy (Chapter 33), Joint Liability (Chapter 34), and Attempts (Chapter 35). Professor Chan's treatment gives the reader the impression of a mind which has sorted out the potential complexities with near mathematical precision, and which is clear as crystal on the what the bottom lines are.

The works of Professors Yeo, Morgan and Chan have been the closest thing to an authoritative text on Singapore criminal law since the publication of the first volume in 2007. This work which for the first time trains its sights on Singapore alone promises to be the primary work of reference for a good many years to come. There simply is no other like it.

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Standing in Private Law: Powers of Enforcement in the Law of Obligations and Trust BY TIMOTHY LIAU [Oxford: Oxford University Press, 2023. XXXVI + 305 pp. Paperback: £110.00]

Rigorous legal theoretical work should explain and justify not just substantive legal rules, but also the procedural superstructure within which those rules are invoked, litigated, and given effect. Dr Timothy Liao's monograph, *Standing in Private Law: Powers of Enforcement in the Law of Obligations and Trusts*, is an example of this. Against the long-standing view that standing rules are either absent from or inconsequential to private law, Liao argues that courts and commentators should recognise the existence of a general rule of standing in private law – only the primary right-holder has standing to enforce his rights – with several exceptions.

Standing in Private Law consists of three parts. Part I – "Conceptualising Standing" – describes and delineates Liao's account of standing in private law. After some methodological preliminaries (Chapter 2), Liao defines standing as a claimant power to hold another accountable before an adjudicative body, like a court, thereby subjecting that person to the court's power (jurisdiction) (Chapters 3–5).

Central to this conceptual definition are two claims. First, standing differs from Hohfeldian (claim-)rights, with correlative duties. Instead, it is a power (to sue),