



香港地產建設商會

THE REAL ESTATE DEVELOPERS ASSOCIATION OF HONG KONG

香港中環德輔道中十九號環球大廈1403室
Room 1403, World-Wide House, 19 Des Voeux Road Central, Hong Kong.
Tel: 2826 0111 Fax: 2845 2521

11 May 2009

Mr. Kim Salkeld
Land Registrar
Land Registry
28/F Queensway Government Offices
66 Queensway
Hong Kong

Dear Kim,

Land Titles (Amendment) Bill - Day Light Conversion vs. Gradual Conversion

1. The Law Society has provided REDA with a copy of its Submission dated 13 March 2009 to the Administration on the proposed change from the "Daylight Conversion Mechanism" to the "Gradual Conversion Mechanism".
2. REDA has previously taken the position that it has no in principle objection to the proposed Gradual Conversion Mechanism.
3. However, having had the opportunity of considering the Submission of the Law Society and, in particular, taking into account the point made in paragraph 12 of the Submission that there appears to be only a limited number of real cases of problematic title, REDA supports the position of the Law Society.
4. It would appear to REDA that if it is correct that Government's exposure under the Daylight Conversion Mechanism is not as extensive as what was thought to be the case when REDA was consulted on the proposal, the Daylight Conversion Mechanism is to be preferred for the following reasons:
 - (a) Upon automatic conversion to registered title under the Daylight Conversion Mechanism, conveyancing transactions would become much simpler and the costs of transactions would be reduced,
 - (b) whereas under the proposed Gradual Conversion Mechanism, the majority of conveyancing transactions would remain a cumbersome and relatively



香港地產建設商會

THE REAL ESTATE DEVELOPERS ASSOCIATION OF HONG KONG

香港中環德輔道中十九號環球大廈1403室
Room 1403, World-Wide House, 19 Des Voeux Road Central, Hong Kong.
Tel: 2826 0111 Fax: 2845 2521

costly process involving checking of title deeds and this would continue for many years to come with no definite timetable for full conversion.

Yours sincerely

Louis Loong
Secretary General

- c.c. (1) Clerk to Joint Sub-Committee on Amendment to Land Titles Ordinance
Legislative Council
- (2) Law Society Working Party on Land Titles Ordinance
(Attn: Ms. Christine W. S. Chu)