

Dear Mr Greg So,

I refer to the public consultation of 2014 Digital 21 Strategy and would like to suggest implementation of electronic submission for registration of land documents.

I have been working in the legal profession with practice focus on conveyancing. I consider that the Land Registry have not done their job well in promoting electronic submission. They have developed an electronic service called e-Memorial Form, which was said to be a stepping stone to e-submission. Since the release of this halfway product several years ago, I have not hear any further news from them of enhancing it into an electronic submission channel. Probably their thinking is that the CPO (Cap. 219) concerning property transactions is exempted from the ETO (Cap.553). They may even want to wait for the LTO (Cap. 585) which is said to be around the corner but never seems to turn corner.

I fully agree that withdrawing the exemption for conveyancing and the CPO is premature and impractical. However, I cannot see any genuine and practical need of keeping the LRO (Cap. 128), which only provides for some archives procedures after the conveyancing, in the Exclusion Order. With electronic submission as an optional channel, we can send image files of land documents (normally of 10 to 20 pages) to the Land Registry for registration and they simply file the image files for record – an obvious win-win result where all parties will get tangible savings from it. Under the provisions of the ETO and the ET(A)O 2004, I do not envisage any real legal, technical or operational issues (except bureaucratic laziness) which would impede immediate implementation of the suggestion. Therefore I request you to include it in the Digital 21 Strategy so that you can amend the Exclusion Order and the Land Registry will provide electronic submission service under the LRO.

Regards,

K P Tsui