



The British
Chamber of Commerce
in Hong Kong
香港英商會

Melissa Pang
The Law Society of Hong Kong
3/F Wing On House
71 Des Voeux Road
Central
Hong Kong

27th November 2018

Dear Madam,

RE: Consultation on the Amendments on the Legal Practitioners Ordinance Cap. 159 ("LPO"), the Foreign Lawyers Registration Rules Cap. 159S ("FLRR"), the Foreign Lawyers Registration (Fees) Rules Cap. 159U, the Foreign Lawyers Practice Rules Cap. 159R and the Solicitors' Practice Rules Cap. 159H

We wish to comment on the current proposed changes to regulations governing how non-Hong Kong qualified lawyers operate in Hong Kong. The British Chamber of Commerce values highly the quality, strength in depth and healthy competition within the legal services sector in Hong Kong, a key part of its "Asia World City" aspirations.

By way of background, the British Chamber of Commerce is one of Hong Kong's biggest and most active international business organisations, with some 1,000 members, from global multinationals to a broad group of SMEs and start-ups. Our members include some of Hong Kong's biggest employers.

Whilst we understand that the proposals are, amongst other objectives, designed to facilitate the supervision of non-Hong Kong qualified lawyers on Hong Kong law matters, we do not believe that the perceived lack of appropriate supervision by Hong Kong qualified lawyers under the current ratio arrangements, or non-Hong Kong qualified lawyers advising on matters touching laws outside their jurisdiction of qualification, are currently issues that significantly adversely affect consumers of legal services in Hong Kong.

As a result, imposing these changes will not address an issue that is of public or business concern but rather they will have adverse consequences on the business community in Hong Kong by making it harder for law firms to hire international talent, and making it more expensive (for both foreign and local firms) to hire and retain high quality local legal talent. This will inevitably force up legal costs and make Hong Kong less competitive as a place to do business, as well as having a negative impact on Hong Kong's positioning as the region's leading business and financial centre. Accordingly in our view these changes should not be made.

Yours sincerely,

Andrew Seaton
Executive Director

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