



THE CHIEF EXECUTIVE'S POLICY ADDRESS 2023 LAW SOCIETY SUBMISSION

1. The Law Society provides this submission in response to the Government's Public Consultation for the 2023 Policy Address¹.
2. In the various submissions on Policy Addresses in previous years, we have set out various legal policies for the Government to consider. These legal policies included the following subject matters:
 - (a) Green and sustainable finance
 - (b) Asset Management
 - (c) Ageing Society and Mental Capacity
 - (d) Protection of Children, Domestic Violence and Children Bill
 - (e) Rights of Accident victims

The above are of significance to the society of Hong Kong. We say that there should be continual policy discussions on those issues.

Judicial Manpower

3. On top of the above, we wish to in this submission reiterate, with emphasis, the importance of allocation of sufficient and additional resources for the Judiciary. The importance and the urgency of this submission are underpinned by a paper produced by the Judiciary Administration in July 2023² for the Panel on Administration of Justice

¹ <https://www.policyaddress.gov.hk/consultation23/en/>

² See LC Paper No. CB(4)721/2023(05):
<https://www.legco.gov.hk/yr2023/english/panels/ajls/papers/ajls20230724cb4-721-5-e.pdf>

and Legal Services of the Legislative Council (“LegCo”). In that LegCo paper, the Judiciary Administration explained that, among other things, 166 of the total establishment of 211 judicial posts were substantively filled (as at 1 April 2023). This meant that only 78% of the posts have been filled at that time.

Shortage of Judicial Manpower

4. The shortage of judicial manpower has been in existence for some time and was described to be “persistent” (see paragraph 4(d) of LC Paper No. CB(4)721/2023(05)).
5. A persistent shortage of judicial manpower leads to or contributes to a long court waiting time, i.e. the time taken from either the filing of indictment (for criminal matters) or setting down of a case (for civil matters) to the date of hearing has now become unduly long. It is the experience of our members that, for both criminal and civil matters, the court waiting time have been on an increasing trend over the past 5 years. A long period of time taken before a matter could be concluded in the courts adversely affects the rights of an accused (in a criminal matter), or prejudices the parties who are rightfully entitled to compensation and damages (in personal injuries claims).
6. Whilst the Law Society is pleased to see that the Judiciary has been actively implementing robust case management to speed up case progress and measures to expedite the delivery of judicial decisions, the Law Society is concerned that such measures have also increased the already very heavy workload of Judges and Judicial Officers (“JJO”). This again pinpoints the need of an immediate solution to increase judicial manpower.
7. We notice and we appreciate the efforts by the Judiciary Administration in recent years in recruiting JJOs. However, the efforts need to be doubled and the Judiciary Administration has to be more resourceful. One suggestion we could make is that, more suitably experienced solicitors with professional competence and integrity could be recruited to serve as JJOs or for appointment as deputy / temporary judges and judicial officers. The Judiciary Administration could look more actively and closely to the pool of solicitors.

Remuneration packages

8. In terms of remuneration packages, there continues to be a noticeable difference between suitably experienced private practitioners and JJOs and, anecdotally, this difference has not been closed or narrowed in the past years.
9. In terms of percentage, the adjustments on remuneration package are not promising. For the latest pay increase for JJOs (for 2022-2023), which took effect from 1 April 2022, we notice that the upward adjustment is a meagre 2.5%³. For approximately the same period of time, according to the statistics from the Census and Statistics Department of Hong Kong, the year-on-year rates of change in the Composite Consumer Price Index for the year 2022 is 1.9%⁴. The year-on-year rate of change in the Consumer Price Index is frequently quoted as an indicator of inflation. Although we are not trying to make a direct comparison of pay increases of JJOs with the above-quoted CPI figure (and we believe that a more scientific comparison should be delivered by professional statistician), the magnitude of the two above-quoted figures roughly give a perception that the most recent pay rises for JJOs could not be said to be encouraging at all.
10. At the same time, JJOs have been handling an ever-increasing volume of cases, many of which are complicated. According to the above-quoted LegCo Paper, the Judiciary has been facing⁵
 - (a) “upsurge of cases relating to the 2019 anti-extradition amendment bill incidents (“anti-EAB cases”) and national security (“NS cases”) which required priority handling. Since 2020, over 2,260 anti-EAB cases and 180 NS cases were brought to various levels of courts. Many of them were relatively complicated cases involving a large number of defendants and lengthy trials”; and
 - (b) “phenomenal increase in judicial review applications on non-refoulement claims and related appeals and other proceedings. The

³ See the Government Press Release of 26 October 2022:
<https://www.info.gov.hk/gia/general/202210/26/P2022102600268.htm>

⁴ See Table 7 of the “Hong Kong in Figures – 2023 Edition” published by the Census and Statistics Department in April 2023: https://www.censtatd.gov.hk/en/data/stat_report/product/B1010006/att/B10100062023AN23B0100.pdf

⁵ See paragraphs 4(b)-(d) of LC Paper No. CB(4)721/2023(05) (ibid)

influx of a total of over 19,000 cases since 2017 (of which over 8,000 are still under processing) has continually been straining [the] judicial manpower”.

11. Given the above we feel that the latest pay increase in actual fact works as a *disincentive* to dissuade potential candidates from joining the Judiciary.

Review of the mechanism in determining pay adjustments

12. We have in one of our previous submissions⁶ urged upon the Standing Committee on Judicial Salaries and Conditions of Service to have a realistic review of remuneration and pay packages of JJOs. We have not seen any review being put forward. We *repeat* our suggestion that the Judicial Committee should have reviewed the mechanism of determining the judicial pay adjustments or, preferably, engage an independent consultancy report (outside of the Judicial Committee) similar to that in 2003, to have an overhaul of the mechanism. The overhaul should commence as soon as possible and, in our views, should consider not only salary, packages and recruitment difficulties, but also the policy and arrangements that could attract talents to the bench. Such could include a feasibility study on conditional permission for JJOs to return to private practice after a certain number of years following after their retirement.

Other Legal Policy Matters

13. In this submission we wish to also highlight the following legal policy matters. The submissions below are succinct, as we have made or we will make submissions on those matters in due course. That said, if detailed views are required, we are prepared to provide further submission and/or to have meetings with the relevant government bureau.

⁶ See the Law Society submission on Government Budget 2019-2020 of 22 January 2019: https://www.hklawsoc.org.hk/-/media/HKLS/pub_e/news/submissions/20190122.pdf?rev=d4fad2adbb4141b69614ce54cf606a&hash=EF7403E7E4A89EE3E6EDB7FFDCF122D8

Court Technology

14. LawTech is developing rapidly. To prepare for technological advances, the Government should consider to commission and carry out in-depth researches on topics such as use of artificial intelligence, ChatGPT (as applied to the legal proceedings) as well as the possible use of virtual reality or augmented reality in the courts. Experiences in other jurisdictions in the above could be of referential values.
15. We have repeatedly indicated support to the Judiciary's integrated court case management system (iCMS) for transactions of court's business with litigants. We are keen to see more resources to be allocated to encourage and to make more use of courts technology by the profession and by the public. A mature and stable use of technology in Hong Kong courts no doubt enhances the global competitiveness of Hong Kong as a dispute resolution centre.
16. Advancements in court technology would also help in risk management for the profession and the Judiciary. This is exemplified by the recent typhoon and the extreme weather that impacted upon Hong Kong in early September this year. The extreme conditions not only caused extensive damages to various infrastructures of Hong Kong (and that is not helpful at all to the images of Hong Kong as an international legal hub), but also posed challenges to the court hearings listed on those days where, by reasons of the weather conditions, all courts and tribunals have closed, and thereby the hearings have all to be adjourned. While iCMS was still functional on those days, we believe that if there could be wider deployment of the relevant court technology to also assist parties with disposition of court business, that would be helpful.
17. All in all, the above underscore the importance and the need to *expedite* technological development for the courts and the court users.

Measures to enhance Dispute Resolutions

18. The "*Outline of the 14th Five-Year Plan for National Economic and Social Development of the People's Republic of China and the Long-Range Objectives Through the Year 2035*" (the 14th Five-Year Plan) and the "*Outline Development Plan for the Guangdong-Hong Kong-Macao*

Greater Bay Area” clearly envision Hong Kong as an international legal and dispute resolution centre in the Asia-Pacific region. To strengthen Hong Kong’s position as a leading legal and dispute resolution service provider in the region, Hong Kong must be able to deliver efficient dispute resolution services to clients coming from different parts of the world, to help resolve their disputes. Strong and unambiguous support from the Government in the above is important:

- (a) The Government should provide guidance, guidelines, precedent and other references documents as well as training to practitioners, so as to promote more use of its various regimes newly introduced to assist parties in dispute resolutions, viz. the Outcome Related Fee Structures for Arbitration and the Third-Party Funding for Mediation.
 - (b) The Government should rightly recognize the worthiness and the value of mediators in dispute resolutions. The mediators should properly be remunerated.
19. Innovative arrangements on reciprocal recognition and enforcement of judgments have in the past few years been put forward. Some of these arrangements help the parties in mutual recognition of judgments in insolvency / bankruptcy proceedings / matrimonial proceedings. They remove the need to re-litigate the same matter across the border. Some other arrangements help facilitate parties to apply for interim measures in an arbitration or to arbitrate their intellectual property (“IP”) rights. In principle, these arrangements are helpful. We ask the Government to continue deliberations with the relevant counterparts, to provide and to expand these and other similar arrangements.
20. We are also pleased to note the recent introduction of the Masters system for family proceedings. The Master system will come into effect on 3 October 2023. We are given to understand that judicial manpower would be committed to the Master system with eight Masters sitting full time in the Family Court. We anticipate that, with the introduction of the Master System, parties with family disputes could have a speedier resolution.
21. The introduction of the Master system for family courts are part of the overall reform of the family justice system for Hong Kong. This reform is underpinned by the Family Procedure Bill and a set of procedural rules.

The Bill was passed and was gazetted on 30 June 2023. In the light of the passage of the legislation, we look forward to more efficient and expeditious resolution of family disputes.

Intellectual Property

22. We have to pick up our pace if we are to accomplish all the IP-related initiatives for Hong Kong under the 14th Five-Year Plan, to establish Hong Kong not only as a regional IP trading centre but also an international innovation and technology hub and a hub for arts and cultural exchange between Mainland China and the rest of the world.
23. We take the view that a number of the IP initiatives should be and could only be effectively led by the Intellectual Property Department of the Government (“IPD”) in collaboration with other departments and bureaux, such as the Education Bureau and the Financial Services and the Treasury Bureau, in order to devise and implement holistic policies and strategies to nurture local IP talents and to strengthen Hong Kong SAR’s overall IP capability to meet the new opportunities and challenges. Whilst we are pleased that the Government has allocated additional resources to IPD to progressively increase the number of its patent examiners to 40 in 2025 and eventually 100 to acquire institutional autonomy in conducting substantive patent examination by 2030, we observe with concern that this results in patent practitioners being lured to leave the private sector to join the Government. This will make it even more difficult and expensive for private practices to recruit patent expertise and train local talents. We suggest consideration be given to subsidise the recruitment of patent practitioners, especially those from overseas, by private practices with the recruitment and training of local practitioners as a condition of the subsidy.
24. In addition to the possible introduction of a patent box tax incentive to the IT sector to carry out more R&D activities and create more patented inventions with market potential, the Government should consider incentives to help private practices to build local patent-related service capabilities in order to boost the original patent grant system.
25. Policy attention is required not only for patents and trade-marks (to implement the Madrid Protocol to allow international trade mark filing in Hong Kong), but also other areas such as continuous updating of our

copyright regime, improving the online IP trading platform, building and promoting IP valuation, insurance and collateralisation.

26. More specifically, the passing and implementation of the Copyright (Amendment) Ordinance 2022 only serves to catch up with some of the developments in the digital operation environment. The IPD should embark on further consultation exercises as soon as possible to tackle more contemporary copyright issues such as:
 - (a) the feasibility and the merits of establishing a copyright registration system in Hong Kong
 - (b) review of authorship, ownership and protection issues relating to works created using generative artificial intelligence technology
 - (c) pros and cons for new exception to allow text and data mining
 - (d) use of new technology, such as blockchain, to prove and preserve evidence of ownership and authenticity of copyright works
 - (e) review of the jurisdiction and powers of the Copyright Tribunal
 - (f) pros and cons about maintaining the current dual protection of copyright and registered design or introducing unregistered design rights in Hong Kong SAR
 - (g) the continuation of a fair dealing exceptions approach or the introduction of a fair use approach or a hybrid
27. Besides promoting IP education at schools and universities and designing courses to promote IP recognition and management with small and medium enterprises, IPD must initiate cross-department and bureau collaboration to design and enhance IP education and awareness in the financial section and to build IP valuation, insurance and collateralisation services in Hong Kong.

International Shipping Centre

28. The 14th Five-Year Plan also supports Hong Kong to enhance its status as an international transportation centre; and on the international front, the *United Convention on the International Effects of Judicial Sales of Ships* (also known as Beijing Convention on Judicial Sales of Ships)

(“Convention”) was open for signature on 5 September 2023. China is one of the signatories.

29. The Convention provides, among others, mechanisms aimed to protect rights of the parties interested in the vessel, by issuance of two documents: a Notice of Judicial Sale and a Certificate of Judicial Sale, and establishing an online repository of such documents which is freely accessible to any interested person or entity. We anticipate that the Convention could enhance legal certainty to parties engaged in ownership, financing and registration of ships.
30. As Hong Kong is a major international shipping centre with judicial sales of ships from time to time, we are prepared to meet and be engaged in the discussion with the Department of Justice on the Government’s plan as regards the application of the Convention in Hong Kong.

International Insurance Centre and Re-domiciliation regime

31. Of equal importance is the positioning of Hong Kong as an international insurance centre. This echoes and continues the policy goal set by the Chief Executive⁷. In this regard, we are pleased to see a proposal on re-domiciliation put forward by the Financial Services and the Treasury Bureau in March 2023. The proposal underpins the above policy goal - allowing insurers or insurance groups to redomicile to and to do business in Hong Kong strengthen Hong Kong’s role as a regional and global insurance hub.
32. In order that the re-domiciliation regime could be attractive, the regime must be carefully designed and be structured to accommodate and to cater for, among other things, compliance issues arising from the re-domiciliation, as well as any authorizations and policy approvals as required by regulators in different jurisdictions and also within Hong Kong SAR. The above embraces much technical details and cross-departmental liaisons and co-ordinations.

⁷ See [Speech by CE at Asian Insurance Forum 2022](#) on 5 Dec, 2022; see also [Development Roadmap for the Insurance Sector in Hong Kong](#) issued on 5 Dec, 2022.

33. On the other hand, for the re-domiciliation regime to be applied to companies generally, there are technical and legal issues that need to be thoroughly considered, such as
- (a) whether the re-domiciliation regime aims at only companies incorporated in common law jurisdictions or is to be extended to civil law jurisdictions;
 - (b) whether Hong Kong SAR is receptive to companies re-domiciliated from countries subject to sensitive geopolitical conflicts, and whether a “whitelist” setting out the acceptable jurisdictions for re-domiciliation is needed;
 - (c) instead of an inbound re-domiciliation regime, i.e. foreign companies re-domiciliated to Hong Kong SAR, whether a “two-ways regime” should be adopted, i.e. for companies incorporated in Hong Kong to redomicile to a foreign jurisdiction. Flexibility is important to the business sector;
 - (d) license requirement, for example, if a business requires a license from for example the Securities and Futures Commission.
34. We anticipate all the above technical details are to be set out in a draft bill for a full public consultation.

Companies (Corporate Rescue) Bill

35. The current insolvency regime of Hong Kong does not provide for any “moratorium”, which would otherwise protect a company from being wound up while it attempts to rescue itself. A statutory corporate rescue procedure (“CRP”) could provide an opportunity for distressed companies to try to rescue themselves from insolvency by introducing a statutory process and moratorium. This could not only help the distressed companies to survive but also protect the interests of creditors by maximizing the recovery of their debts. This is beneficial to the overall business environment in Hong Kong, in particular when Hong Kong is facing economic hard time and challenges.

36. We have in one of our previous submissions⁸ highlighted the importance of having a modern and updated corporate rescue regime in Hong Kong. We repeat that the Government should proceed with legislation exercise for the *Companies (Corporate Rescue) Bill* to implement a statutory corporate rescue procedure (“CRP”) and insolvent trading provisions in Hong Kong, as early as possible.

Stock Market Overall Structure and issues relating to GEM

37. It is timely to consider whether the current stock market structure is best placed to continue to serve the developed international market which Hong Kong has become. The Hong Kong stock market may benefit from competition within a well-regulated framework from one or more other SFC licensed and authorised exchanges which may wish to provide stock exchange platforms in relation to, for example, capital raising for SMEs with proportionate regulatory obligations and a disclosure based capital raising board for local and international issuers.
38. The sharp fall in new listings on GEM from 75 in 2018 to 15 in 2019 causes grave concerns. There have been less than a total of 10 new listings since then, with only 1 in 2021 and none in 2022 or 2023.
39. The performance of GEM market is clearly disappointing.
40. We received views that that the amendments to the GEM Listing Rules in 2018 which raised the GEM admission requirements and removed the streamlined process for transfer of listings from GEM to Main Board have prejudiced Small to Medium Sized Enterprises (“SMEs”) in financing and in listing. There are also criticism that
- (a) the Hong Kong Exchanges and Clearing Limited (“HKEX”) has been too opportunistic to try to capture business opportunities.

⁸ See the Law Society submission on Government Budget 2023-2024 of 7 February 2023:

https://www.hklawsoc.org.hk/-/media/HKLS/pub_e/news/submissions/20230207.pdf?rev=1ea1d241644049cf8ded61a202dd1eb4&hash=17BE2C6D497441BAF6E1A6486C3773D4

- (b) HKEX has been paternalistic in its listing regulations. GEM is over-regulated and that discourages applications.
 - (c) The GEM Rules have been changing too often and that poses uncertainty to the listing process.
 - (d) The listing process is not transparent. There are inconsistencies in the listing decisions.
 - (e) The various committees of the HKEX are composed of representatives from large financial institutions and professional firms. There is no representation from SMEs and their views could not be reflected or considered in the relevant committees.
 - (f) The reputation of GEM is not good. GEM listing has become a stigma and that discourages second-tier companies from listing on HKEX; and
 - (g) Listing on HKEX is costly.
41. It is of utmost importance that the Government, HKEX and the Securities and Futures Commission (SFC) are to focus their efforts to strengthen the fundraising platform in Hong Kong.
42. We understand that the Government has set up a task force to look into the above issues. This is an important policy initiative on a macro and structural level and it requires extensive discussion. We ask that, in the deliberation, the legal sector needs to be engaged, as legal professionals are one of the important stakeholders.

Protection of Investors

43. Recent allegations of fraud amounting to more than HK\$1.2 billion involving cryptocurrency platform JPEX Exchange have attracted a considerable amount of media coverage. While it is not appropriate for the Law Society to comment on the specifics of a case which is still *sub judice*, the allegations highlight two deficiencies in Hong Kong's legal and regulatory framework in this area.

44. The first is that there is a long history of certain "investments" falling outside industry or product specific legislation (such as the Securities and Futures Ordinance). Examples include leveraged foreign exchange trading in the 1990s and, more recently, cryptocurrencies – both of which only became subject to regulation after large numbers of investors had suffered losses. There remain various investments which fall outside investment-specific regulation and which are only regulated to the extent that they fall within general legislation covering such matters as fraud, misrepresentation or money laundering.
45. The second is that sanctions against the perpetrators or enablers of investment fraud are typically limited to imposing fines, terms of imprisonment or banning orders. It is almost unheard of for sanctions to include orders to compensate the victims of the fraud. Instead victims seeking compensation are left to pursue remedies at their own expense – which is, more often than not, prohibitively expensive. In effect, there is no recourse available to the victims.
46. The Law Society is very strongly of the view that Hong Kong's standing as an international financial centre would be enhanced if, where investors have suffered loss as a result of fraud or other improper conduct, either the court or the regulatory body hearing the case should have the power to order payment of compensation to investors without the need for separate proceedings.

Extension of Land Leases

47. Another important policy matter that merits close attention is renewal of land leases in Hong Kong beyond 2047.
48. The Development Bureau in late May 2023 published a paper⁹ to the Legislative Council Panel on Development to explain the latest renewal of land leases. The paper says that although no general purpose lease¹⁰ will expire until before June 2025, there will be general purpose leases of about 2,400 lots expiring from June 2025 to 29 June 2047. And for 30

⁹ See CB(1)555/2023(02)

[https://www.landsd.gov.hk/doc/en/lease-ext/Legislative_Council_Panel_CB\(1\)506_2023\(04\)_e.pdf](https://www.landsd.gov.hk/doc/en/lease-ext/Legislative_Council_Panel_CB(1)506_2023(04)_e.pdf)

¹⁰ The General Purpose Lease refers to those leases mainly for commercial, residential or industrial uses. See paragraph 3 of the above LegCo Paper

June 2047, general purpose leases of around 300,000 lots will expire concurrently on the same day. The volume of work appears to be daunting.

49. The Development Bureau now puts forward a legislative proposal to extend upcoming expiring land leases. Under the proposal, general purpose leases may be extended in a batch-by-batch manner at the sole discretion of the Government for a term of 50 years without payment of additional land premium, but subject to an annual rent equivalent to three per cent of the rateable value of the property.
50. We note that only the principles of the proposal are outlined in the LegCo paper. At the time of this submission, a draft bill has not been issued. Also, so far, there is no detailed discussion on how the legislative proposal is to be implemented.
51. In our views, there must be certainty in the renewal of land leases in a timely and orderly manner upon their expiries. This is significant to the public and the business sector. It is of pivotal importance that an effective and efficient protocol could be put in place and in a timely manner to deal with land leases expiring from 2025 onwards.
52. We need to emphasize that the complexity and the technicality of the renewal exercise cannot and should not be underestimated¹¹. Both the formulation and the implementation of this important legislative proposal require full advisement from the Department of Justice as well as careful consideration of manpower deployment of the Lands Department. We urge the Government to come up with the draft legislation for consultation as soon as practicable. The Government should also explain to the public how it is to implement its legislative proposal.

The Legal Profession

53. Solicitors play a pivotal role in contributing to Hong Kong's positioning as an international financial hub. Their expertise in cross-border legal matters, multi-lingual skills, and common law training make them essential contributors to the city's success. With the integration of the

¹¹ See e.g. those arguments advanced in the Court of Final Appeal in *CHAN TIN SHI v LI TIN SUNG et al* (FACV No. 7 of 2005).

Greater Bay Area (“GBA”) and the need for legal professionals conversant with Mainland legal systems, Hong Kong lawyers are uniquely positioned to bridge the gap between jurisdictions, especially between common law jurisdictions and the Mainland.

54. The Law Society’s systematic connections with its Mainland legal counterparts, facilitated by the Joint Meeting for Lawyers Associations in the GBA, further strengthen Hong Kong’s legal ecosystem. This platform promotes collaboration, knowledge sharing, and business opportunities, thereby enhancing Hong Kong’s attractiveness as a destination for international investment, as well as Hong Kong’s unique strengths in facilitating Mainland enterprises going global.
55. To sustain and propel this growth, it is crucial for the Government to invest more resources in the legal sector. Specifically, young solicitors should be provided with opportunities to be part of the GBA’s development. By nurturing their skills and facilitating their engagement with Mainland counterparts, Hong Kong can harness the potential of its legal talent and ensure a seamless transition between legal systems within the GBA.
56. Further, it is essential for the Government to include legal professionals as integral members of delegations promoting Hong Kong’s business opportunities overseas. Their legal expertise and insights can provide valuable guidance on regulatory matters, contract negotiations, and dispute resolution, bolstering the confidence of international investors and fostering stronger international partnerships.
57. In brief and furthermore, we ask the Government to
 - strengthen Hong Kong’s unique role of being the only jurisdiction in PRC to adopt a common law system; to foster confidence in the Hong Kong legal profession among different sectors of local and international community by facilitating opportunities for collaboration between the Hong Kong legal profession and different sectors within and outside Hong Kong jurisdiction;
 - support members of the legal profession to explore different ways of conducting legal practice while maintaining professional standards and international reputation;

- empower law firms of all sizes to have sufficient access to feasible options to align themselves with professional standards of an internationally acceptable level; and
- provide a supportive environment for legal education and training through innovative means thereby facilitating a sustainable and reputable Hong Kong legal profession.

Conclusion

58. The submission in the above outlines some of the initiatives for consideration by the Government. There are other policy matters which are of equal importance, such as the generation of sustained interest to set up family offices in Hong Kong to include investment-migration programme, tax breaks and art storage facilities etc; the establishment of a Sports / e-Sports Dispute Resolution Mechanism to promote sports industrialization and the proper development of a sports ecosystem for Hong Kong; the improvement of legal aid and legal assistance to enhance access to justice. These are matters which by themselves merit their own reviews and submissions. We are prepared to send in our views and/or to meet with the Government to discuss these and other subject matters.

**The Law Society of Hong Kong
28 September 2023**