



# 香港地產建設商會

## THE REAL ESTATE DEVELOPERS ASSOCIATION OF HONG KONG

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Secretary for Economic Development and Labour  
Economic Development Branch (Division A)  
Economic Development and Labour Bureau  
2/F Main Wing  
Central Government Offices  
Lower Albert Road  
Hong Kong

Attention: Mr. Jonathan McKinley

*Dear Mr. McKinley,*

### **Public Consultation on the Way Forward for Hong Kong's Competition Policy**

We thank you for your letter of 6 November 2006 and would like to share with you our views on the way forward for Hong Kong's Competition Policy.

Whilst agreeing that our competition policy must keep pace with the times, we are not convinced that there is a case for introducing a general competition law here. From overseas experience, a general competition law will invariably require a corresponding bureaucratic institution to administer and enforce. Such arrangement will most likely turn out to be an impediment to the operation of the free market with unnecessary regulation in many industries which have long benefitted from open competition.

As far as our own industry is concerned, the real estate sector is arguably one of the most competitive industries in Hong Kong. We are witnessing market forces operating to the fullest extent in every aspect of our business on a daily basis. There may be a few sectors in Hong Kong where market forces are not allowed to operate freely either due to historical reasons or the existence of an incumbent dominant player. We believe these can be addressed specifically by a sectoral regulatory approach which has proved to be very effective in the telecommunications industry.

As a concluding remark, we believe the Government can play a leading role in enhancing a fair and competitive operating environment by injecting a greater degree of openness and transparency in the implementation of its policies and a consistent application of its own rules and regulations.

Yours sincerely

Louis Loong  
Secretary General