I strongly object to the proposed changes under the Consultation Paper for the following reasons:

1. No convincing argument for the proposed changes

I do not see one convincing argument for the proposed changes to the current system, which has been serving Hong Kong extremely well for 30 years.

2. How can the proposed changes increase efficiency by creating more layers and complication?

The SFC claims that the proposed changes would increase efficiency of the decision-making process for listing regulations. However, the proposed change of breaking up the Listing Committee into 3 different committees, in my opinion, would only create bureaucracy, complication, and confusion to the process, thereby greatly reducing efficiency, rather than increasing efficiency.

3. Fine-tuning / no increase in SFC Power - then what is the purpose?!?

The SFC further claims through the media that the proposed changes are merely fine-tuning of the existing process, with no increase in power of the SFC. If that is really the case, what is the SFC's purpose, why is the SFC proposing the changes, when there are so many objections in the market??

4. The SFC should stop blaming all the problems on someone else

The SFC claims that the proposed changes would enhance corporate governance because the SFC can have more direct and early involvement in the vetting process. The SFC also claims the proposed changes would help investors by having better quality companies list in Hong Kong. The very true fact is, the SFC has been fully involved in the vetting process all along via the dual filing regime. If there is anything that went wrong in the past, the SFC should be fully responsible as well! The SFC should stop blaming all the problems/issues on someone else. The SFC is responsible as well!! Many good quality companies has already chosen to list on other stock exchanges purely because of the bureaucracy of the SFC.

Iring Tung

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