heretofore in force in the Mainland or in Labuan or of any order made or the validity or invalidity of anything done or suffered or any right, title or interest created thereunder." nothing should affect the past operation of any written law relating to land tenure except with amendments.

Also, we understand that under Section 40 of the Sabah Land Ordinance (Cap.68) the rights of the owners of titles with lease term of 999 years are protected. Section 40 explained that: *"If the owner of any land comprised in any document of title is desirous of dividing or partitioning such land, application shall be made to the Collector to accept a surrender of such title and to issue new leases or make new entries in the Register relating to the land comprised therein in such lots as the owner may desire. The Collector shall thereupon in lieu thereof and subject to the provisions of any written law for the time being in force relating to Town Planning or governing the size, shape or area of land to be held under any single title., issue such titles as may be required, on the terms of the original title: Provided that all arrears of rent and charges, if any, due under the original title shall have been satisfied:...."* the owner of any land may apply to the Lands & Surveys Department for subdivision of their land and upon approval, shall surrender the title for issuance of the new subdivided titles **on <u>the terms</u> of the original title**.

With the abovementioned of **Section 3 and 40 (Cap.68)**, it is possible to implement the people's wish of **<u>maintaining the original lease term of 999 years for the land title after subdivision and change of land use</u>.**

Generally, the land lease term of whether **999** or **99** years do not very much affect **the selling price of the houses fixed by the developers**. However, the people or "*rakyat*" will definitely want a longer lease term.

A 99-year lease term, will only last for 2 generations at the most. When the title deeds expire and if the house owners do not pay the extension premium, the land will become state land and goes back to the Government.

By that time, **many of the "*rakyat*" will lose their homes, if they cannot afford to pay the extension premium.** Furthermore, in the case of properties such as apartments, condominiums and so forth, during the expiry of the 99 years lease term, the parcel **owners** or Management Corporations **(MCs)** will have to step in to apply for extension of the lease term for the **block title** which consists of all the subsidiary titles.

The MCs or owners will have to pay the extension premium together in ONE LUMP SUM.

As we all know, it is already so tough and troublesome for the MCs to collect management fees, it is even more difficult to collect the extension premium from the owners and pay at **one time** to the government in order **to extend the lease term.**

Normally, an owner of the property with **longer lease term** will naturally be keener to renovate their **properties** to enhance the value by **maintaining the house in tip top quality for a long, long time** because with 999 years, there is no worry of the property reverting to state land one day.

For the sake of the people in Sabah to have quality houses, the Government should seriously consider maintaining the <u>original 999 years lease term after sub-division</u>.

(2) EXPEDITE THE ISSUANCE OF SUBDIVIDED LAND TITLES

We, the housing developers wish to have quick issuance of subdivided land titles or subsidiary titles to our house buyers, and for this, we hope the Lands & Surveys Department could assist us to realize our wish.

(a) In order to expedite (speed up) the issuance of subdivided land title for the house buyers, we request the Lands & Surveys Department to consider to fix a time frame of <u>6 months</u> to issue <u>letter of offer</u> for our application for conversion and subdivision of the master title.

(b) Also, for early registration of the subdivided titles, we appreciate very much the proactive measures taken by the Lands & Surveys Department in speeding up processing of the subsidiary titles by **<u>removing the need for payment of assessment</u>** during the stage of submission of Form A **(surrender of master title form)**.