



November 17, 2020

Jennifer Brun  
President  
The Canadian Bar Association (CBABC)  
British Columbia Branch  
10<sup>th</sup> Floor, 845 Cambie Street  
Vancouver BC V6B 5T3

Dear Jennifer Brun,

Thank you for your letter of November 13, 2020, requesting advance access to the Land Owner Transparency Registry (LOTR) prior to its launch of November 30, 2020. LTSA values the relationship we have with the CBABC and our collaboration to date in introducing this first-of-its-kind initiative to your real property members. However, we are unable to grant advance access but have implemented several initiatives to prevent the difficulties described in your letter.

The [Land Owner Transparency Regulation](#) is brought into force by Order-in-Council 549. Of material importance, provisions for statutory authorities and required filing under the [Land Owner Transparency Act](#) will not come into force until November 30, 2020. There is no legislative authority to grant early access to the system.

Since the *Land Owner Transparency Act* received Royal Assent in May 2019, we have delivered nine webinars to professionals involved in real estate transactions including two hosted by the CBABC. We have conducted two live system-focused webinars along with [a recorded session](#) that is viewable at your members' convenience as well as [sample forms](#) so practitioners can know ahead of time what information will be required from their clients. Additional video tutorials and help resources will also be published this week on [landtransparency.ca](#). LTSA has also held policy-focused webinars that review this important legislation, with another session scheduled for [November 19, 2020](#).

There have been two phases of user testing where sessions included individuals representing law firms and notaries. These participants included lawyers, notaries, paralegals and legal assistants. Their valuable input was considered in the LOTR build. Throughout the year, the LTSA's Legal Practices Advisory Committee (which includes CBABC members) has received LOTR updates as part of their regular meetings. The LTSA also consulted with the RCMP, CRA, FICOM, FINTRAC, Law Society and BC Assessment for their requirements regarding search capabilities. In summary, the LTSA has communicated, consulted, demonstrated, tested and incorporated input wherever possible in the design and build of LOTR.

LOTR has been built using the same rigor and standards with which we have built and operated BC's Land Title system. Part of our testing process includes ensuring the system can still perform in accordance with statutory requirements and our high delivery standards despite load. By way of example, LTSA processed nearly 6,300 applications on September 30 and 6,600 applications on October 30, all without incident. LOTR has been built and tested to handle a volume of transactions well in excess of the highest expected load for November 30, 2020, of 1,500 filings.

On Saturday November 28, 2020, the LTSA's customer support team, LOTA Administrator and LOTA Deputy Administrator will be available to customers for telephone and email inquiries. On Monday November 30, 2020, additional staff will be on standby to support customers through phone and email inquiries.

We thank you for your concern and encourage your members to use all resources currently available in order to best prepare for filing to LOTR on November 30, 2020. We are also listening – if you have additional ideas from your members, please feel free to share them for consideration at [lotr@ltsa.ca](mailto:lotr@ltsa.ca).

Sincerely,

A handwritten signature in blue ink that reads "Connie Fair". The signature is written in a cursive, flowing style.

Connie Fair  
President and CEO

cc: Kerry Simmons, QC Executive Director, CBABC  
Reuben Danakody, Director, LOTR Services, LTSA  
Brett Polloway, Director, Process Management & Analytics, LTSA