

A wide-angle, night-time photograph of a city skyline, likely Phnom Penh, Cambodia. The image shows numerous high-rise buildings with lit windows, a river in the foreground, and a bridge in the distance. The sky is dark with some light clouds.

Further Clarification on the Registration Procedure for Private Units in Old Co-Owned Buildings Constructed Before 1979 and 1997

Following the issuance of Prakas No. 050 by the Ministry of Land Management, Urban Planning and Construction (“**MLMUPC**”) in 2024—which provided initial guidance on the registration of private units in co-owned buildings constructed before 19 December 1997 (see our previous update: [Cambodia Gives more Clarifications on Registration of Private Units of Co-Owned Buildings Constructed Before 1997 - DFDL](#))—the MLMUPC has now issued Circular No. 001 on Registration Procedure for Private Units in Old Co-Owned Buildings Constructed Before 1979 and 31 December 1997, dated 22 May 2025 (“**Circular 001**”). This Circular aims to further streamline, clarify the registration procedures and to ensure legal ownership for possessors of private units in co-owned buildings constructed before 1979 and 19 December 1997.

Key Highlights from Circular 001

Principles of Registration

Circular 001 outlines the following core principles of registration:

1. Registration of the “land plot” where the co-owned building is located.
2. Registration of “private units” within those co-owned buildings.

The registration process must be conducted on a village-by-village basis, in accordance with the principles and procedures of both systematic and sporadic registration systems.

Applicable Registration Process

1. Identification of Land Plot

Registration officials must begin by identifying and collecting data (based on their standard prescribed forms) on the land where the co-owned building is situated. This includes:

- Details of the co-owned land plot and building.
- Information on the number of co-owners or private unit owners.
- Supporting documentation, where applicable.

2. Identification of Private Units

This step must align with the land plot registration and be based on the application dossier submitted by using their standard prescribed forms (data collection form for private units of co-owned buildings). All data, including measurements and unit areas, must be entered into the MLMUPC's computerized system.

3. Public Display

Once the above steps are completed, officials will publicly display the relevant survey documents, allowing time for objections (although no specific timeline is mentioned).

4. Issuance of Title Certificates

If no disputes arise, the land plot will be registered in the "Land Registry Book", and an immovable ownership title certificate will be issued.

For private units, they will be registered in a separate "Registry Book of Private Units of Co-Owned Buildings" created for each village. Any private units under dispute/protest will be held pending resolution.

To receive ownership certificates for private units, owners must surrender the original immovable ownership certificates over houses or other relevant documents evidencing the legal possession over immovables of co-owned buildings (if applicable), which will become invalid, to the cadastral administration in exchange for the new ownership certificates.

Foreign Ownership Still Unclear

Despite the progress, one key question remains unanswered:

Can foreigners legally own or register units in these pre-1979 and pre-1997 co-owned buildings?

Until formal guidance is issued, foreign investors should seek tailored legal advice to assess risks and opportunities.

Why This Matters

Whether you're a long-term occupant, developer, or investor, this update may impact your property rights and investment strategy. With the growing demand for formalized property registration, understanding the regulatory landscape is crucial.

For general guidance on real estate matters, please download our updated Real Estate Investment Guide for 2025 here: [Investment Guide to Real Estate in Cambodia – 2025 - DFDL](#).

Disclaimer: *This update is for informational purposes only and does not constitute legal advice. For specific concerns or questions, please do not hesitate to contact us.*

Questions?

For personalized insights or assistance with your property registration, reach out to our Cambodia team:



Seka Hep
Partner
seka.hep@dfdl.com



Davy Kong
Partner, Co-Head of Real
Estate and Hospitality Practice
davy.kong@dfdl.com



Leung Seng
Co-Head of Real Estate and
Hospitality Practice
leung.seng@dfdl.com