

致立法會

卡拉 OK 條例草案委員會

敬啟者：

卡拉 OK 條例關注組對卡拉 OK 條例草案提出下列各點：

1. 關注組認為政府立例目的是希望保障市民的安全，但草案當中政府只著重重刑對付卡拉 OK 經營者。卡拉 OK 原是提供普羅大眾歌唱娛樂，政府預算引用等同「危險藥物條例」、「賭博條例」等等這類嚴厲法則來監管（以上的兩條法例都清楚說明危險藥物是無益兼有害的物品；賭博亦是違法的行為，所以立例禁止所有賭博）。但市民沒有認同卡拉 OK 場所等同上述的嚴重罪行，所以政府的做法是不恰當。
2. 同時，政府實施新的管制與其他條例比較亦是十分嚴厲，卡拉 OK 是正當的歌唱場所，如政府認為當中一些經營者違法，尚有很多法例可引用及監管，例如：
 - a. 應課稅品條例(cap.109)對付無牌售酒、醉酒、青年喝酒等。
 - b. 危險藥物條例(cap.134)對付吸食或販毒。
 - c. 刑事罪行條例(cap.200)對付色情行為及黃色事業。
 - d. 社團條例(cap.151)對付黑社會活動。
 - e. 侵犯人身罪條例(cap.212)對付毆打、打架等罪行。

為什麼在卡拉 OK 條例草案中，不是著重“安全”，卻以“監管”為主。

3. 有關 ERM 的評估報告，關注組提出強烈的反對。
 - a. ERM 在去年向業界發出的問卷時是以英文書寫，其中收集業界意見部份是以「SEMINAR」為名稱，極有誤導成份（最後才發出一份中文問卷）。
 - b. ERM 發出的問卷數目很少，只接觸小部份經營者，並沒有代表性。

- c. ERM 發出的問卷時，只限制業界一星期內答覆，而發問卷時是二零零零年九月十二日寄到業界時是二零零零年九月十五日（二零零零年九月十三日是公眾假期、二零零零年九月十六日是星期六及二零零零年九月十七日是星期日）祇餘 2 天答覆問卷，二零零零年九月二十日是「SEMINAR」的第一天。
 - d. ERM 問卷中只提出各點安全要求，並沒有把草案監管部份提出，而且安全要求部份並沒有訂明安全標準，業界根本沒有充分時間及根據作答。
 - e. ERM 沒提供充分的資料及據理，只直接引用屋宇署的估計數字，評估沒有真實性。
 - f. ERM 評估火災的數字沒有代表性，在整份評估書中，祇提及 2 次（都在一九九七年）的火警，其中更倚靠某一份報章提及一個卡拉 OK 場地的火警；ERM 沒有進行獨立性的調查，所以計算出來的「EVENT TREE」及火警機會當然不準確。
4. 由於 ERM 計算的數字不準確，得出來的結果當然沒有代表性。例如：ERM 在評估報告中說每年應有 3.777 的生命喪失。但由一九九七年至今已經四至五年，從沒有因為卡拉 OK 火警而引致受傷或死亡（如引用 ERM 計算的系數，應該有 $3.777 \times 5 = 18$ 人至 19 人死亡）。況且自 80 年代中期有卡拉 OK 場所到現在已有十多年，從來沒有因為意外產生火警引致死亡（TOP ONE 事件是人為縱火），事實證明了 ERM 計算的方法是絕對錯誤，業界當然不能接受。
5. 政府解釋容忍期有 36 個月亦是誤導，因為只是寬限一小時耐火牆而死角位仍然要取消，這樣要拆去分格牆，即索一髮而動全身，其他間格亦同時必須改動，所以 36 個月的『容忍』亦是空談。
6. 關注組不接受樓面承重量限制為 5KPA 的計算方法，因為部份的食肆沒有 5KPA。
7. 關注組不接受「適合地區」的限制，因為會影響行業的發展空間。可能引致造成貪污及不公平。

最後，關注組已向本地及海外專家徵詢及收集其意見，而業界亦已聘請測量師對現有場所作實際評估報告，可希望在 6 星期內交到貴委員會。

- 現附上附件
- 一) 臨時市政局和臨時區域市政局。在 1998 年的會議紀錄-清楚說明現有卡拉 OK 場所在 4 項結構要求可以豁免。
 - 二) ERM 對業界發出之問卷。
 - 三) 業界對 ERM 的書信來往表明要求 ERM 需要深入研究才可做到真正為市民安全，反影投資者及相關行業所受的影響。

卡拉 OK 條例關注組
日期：2001 年 4 月 10 日

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Letterhead of Environmental Resources Management

12 September 2000

California Red Ltd
1/F Tak Lee Commercial Building,
113-117 Wanchai Road,
Wanchai,
Hong Kong

Attn.: Mr Anthony Lock, Managing Director

Our ref: 135074\C2098

Dear Sir,

***The Licensing Of The Karaoke Trade
Request For Information***

As you might be aware the Government has tabled the 'Karaoke Establishment Bill' and will be introducing a licensing scheme that will bring all Karaoke Establishments under the control of a statutory licensing system. ERM have been retained by the Government's Business and Services Promotion Unit (BSPU) to examine the proposed licensing scheme and evaluate the impact on the trade. This is being done so that effective means can be established to minimise the costs on Karaoke Establishment operators in complying with the licensing requirements.

As such we need to get a thorough understanding of the current situation and have prepared the attached information and questionnaire to facilitate this process.

We would be grateful if you could look over the attached information and complete the questionnaire. This information will be used to analyse the costs of the proposed scheme on the trade and inform subsequent decisions on the form of the licensing process.

In addition, we would like to invite you to attend a seminar to discuss these issues and let us know your key concerns. Seminars will be held at our offices (see the address above) starting at 2:30pm on the following days:

20 September 2000 (Wednesday)

21 September 2000 (Thursday)

22 September 2000 (Friday)

If you wish to attend one of these seminars, could you please complete the attached slip below and fax it back to us as soon as possible. We would also greatly appreciate your time in completing the attached questionnaire so that we can take into account your concerns when proposing to Government the most acceptable means of introducing the new regulations.

Yours faithfully,
For ERM-Hong Kong, Ltd

David Arthur
Technical Director

Encls.

PLEASE FAX TO ERM AT 2367 6396 OR TEL. NO. 2271 3109

I confirm that I wish to attend a seminar on the Introduction of the new Karaoke Regulations on 20/ 21/ 22 September 2000 (please mark the date you wish to attend)

Name	
Company	
Address	
Contact Number	

INFORMATION ON THE PROPOSED LICENSING SYSTEM

The following requirements which are likely to impact the trade have been identified:

Requirements of the Licensing System:

- Preparation and submission of a plan of the premises (including exits, internal walls, sanitary fitments, fire safety equipment, vents/windows, large furniture)
- adequate ventilation system
- adequate sanitary facilities
- adequate fire safety equipment
- conformance with building safety requirements
- ensure hygiene standards (dustbins, microphones)
- display license
- gain permission for alterations, maintain premises

Specific Fire & Building Safety Requirements

- Cannot be located on basement level 4 or below
- combustible materials to meet BS/ASTM standards (ceilings, partitions, draperies/curtains, carpets, furniture)
- smoke extractor system (if approved windows covered)
- illuminated exit signs and directional signage
- fire escape schematic to be displayed
- emergency lighting
- fire safety video to be shown
- fire safety training for employees at least annually
- fire hydrant and hose reel
- manual fire alarm system
- alarm bells in individual rooms
- automatic fire alarm system (for premises over 126m²)
- sprinkler system
- dedicated smoke extraction system
- audio-visual advisory system
- dead end situation only permitted in unavoidable situations (due to building design)
- two way exit routes of sufficient width (1.2m) and fire resistant
- building services openings protected to prevent spread of fire
- visual panel from rooms into corridors

Principal cost impacts of the new regulations on the trade:

- equipment costs for fire safety equipment
- works costs of modifications works required
- costs of preparing evacuation plans, safety videos
- potential cost of moving to suitable premises
- time costs of applying for licenses
- revenue costs of reduced capacity arising out of controls on corridor widths etc

We have attached further information in the form of the consultation document (February 1998) and the subsequent Legislative Council Brief and the Proposed Bill (March 2000)

QUESTIONNAIRE

1.	Name and Address of Organisation
2.	Contact Person, Telephone and Fax Number
3.	Typical Turnover (HK\$ per annum)
4.	Profit (either % or HK\$ per annum)
5.	Current Capacity
6.	Average attendance (if figures available please specify numbers for a typical weekend, public holiday as well as weekdays)
7.	Total area of Premises
8.	Area dedicated to Karaoke
9.	Number of Staff
10.	Please specify which of the above listed improvements you will have to make
11.	Please indicate which costs you feel will be most significant for your business
12.	What business licenses do you currently hold?

Letterhead of CALIFORNIA RED LIMITED

附件<三>

BY FAX & BY MAIL
(Fax: 2723 5670)

September 29, 2000

Environmental Resources Management
6th Floor, Hecny Tower
9 Chatham Road
Tsimshatsui, Kowloon

Attn: Mr. David Arthur
Technical Director

Dear Mr. Arthur

**THE LICENSING OF THE KARAOKE TRADE -
REQUEST FOR INFORMATION**

I refer to your letter dated September 12 on the captioned and my subsequent meeting with Dr. Gordon Ng of your office and Mr. Siu Ming Lo of the City University of Hong Kong. I would like to express my delight in the Government's intention to obtain a thorough understanding of the current situation of our trade.

Having read through your correspondence and discussed the issue with fellow Karaoke operators, I would like to express our comments as follows.

Appropriate Representation

Much as we respect your professionalism in the field of environmental evaluation, the information you provided did not illustrate your relevant experience or thorough understanding in our industry. In view that any proposed change to our trade could result in diverse impact, not just for the Karaoke business, but also on a number of other industries, it is therefore critical for the consultant to have an in-depth knowledge of the industry and its character. Any misrepresented report being submitted to the Government would cause great harm not only to our trade, but also to all other related industries.

Circumstance of the Request for Information

We were not previously notified by the BSPU of your company's appointment to conduct this evaluation, and the official notice was only received from the department on September 20, upon our request.

Your letter was received by most of us on September 15, as September 12 was Mid Autumn Festival and September 13 was a public holiday. The letter was presented in English, which had caused further delay to those operators who possess limited knowledge on the language.

You required us to complete a detailed questionnaire and confirm attendance in a seminar, but allowed only 2 to 3 days for us respond.

The arrangement of the "seminar" was extremely confusing and unclear, and was interpreted by most of us in the industry to be a training session, rather than a consultation meeting.

Furthermore, the questionnaire required us to furnish essential trade secrets without any assurance of confidentiality of the information.

Limited Extract of Background Information

On the page headlined - Information of the Proposed Licensing System, you have only highlighted some requirements "identified" as "likely to impact the trade". Based on what background information or input had you made such bold assumptions, we do not know.

The content was lacking in comprehensiveness, in that essential information such as License application procedures, documentation required for application, application lead time, and restrictions on operation, e.g. hours, location, etc., were not detailed.

Furthermore, the attachments listed, i.e. Consultation Document (Feb. 1998) and the subsequent Legislative Council Brief and the Proposed Bill (March 2000) were not attached as stated.

Partial provision of information will ultimately result in a misrepresentation of the whole picture on hand, causing misunderstanding and wasting valuable time in the collection of feedback.

Vague and Unclear Information

Over the past 2 years, representatives from our trade have had regular meetings with relevant Government departments, including the Urban and Regional Councils. We have made various recommendations for amendment to different consultation papers proposed. However, it was not specified in your document which version of the proposal we should based our reply.

Calculation of Cost Impact

Without clear and precise information and/or guidelines, it would be unrealistic, if not impossible, for us to calculate the potential cost impact if the new regulations are implemented.

Furthermore, other important details such as:

- Would ALL existing operators be required to commence renovation immediately to comply with the rules; or would an exemption period be allowed for those operations with tenancy agreement due to expire?
- Could the operation resume once renovation is completed (but before the license is granted)?

- Who will compensate for lost of revenue?
- Who will pay for the hugh renovation cost?
- What is the recommended arrangement for the existing staff during renovation?

The above are all critical information that were not mentioned in your correspondence. All of which are important factors that will allow us to estimate the potential cost impact of the proposed exercise.

Impact on Industries/Social Impact

Let us reiterate once again that the Proposed Licensing System will not only cause major disruption to the Karaoke industry, it will also have a massive rippling effect on related industries and businesses.

- Karaoke Business Operation - based on the Proposed Licensing System, it is estimated that all Karaoke operations will have to close down for 2 to 6 months to allow time for renovation and process of license approval. Due to the high cost involved (*in terms of renovation costs and loss of revenue during renovation*), many operators may be forced to cease business as a result.
- Employment Market - a substantial number of workers will be temporarily suspended during the above-mentioned period, not to mention the potential unemployment due to business closure. The majority of the workforce in this industry belongs to the grassroots level, and many of them are young school leavers. Temporary or permanent suspension will have a direct financial impact to the individuals and will increase the unemployment rate.
- Tourism Traffic - Karaoke entertainment forms an integral part of the tourism industry. Hong Kong will lose her appeal if Karaoke businesses are forced to suspend operation. Amidst intense competition for tourism traffic throughout Asia, if too many inflexible restrictions are imposed on the local entertainment industry, a negative image may cause a decline in visitor numbers.
- Real Estate - the requirement for renovation gives rise to a number of issues:
 - Rental charge arrangement during renovation;
 - Requirement for renovation approval by landlord;
 - Violation of tenancy agreement - it should be noted that some tenancy agreement may not allow disruption of leasing arrangement for renovation;
 - Effect of renovation to other tenants of the premises - temporary suspension of business of the Karaoke may affect the overall traffic and business of neighboring outlets, say, in a shopping mall.
- Music and Entertainment - the Karaoke business has always maintained a close relationship with the music industry and the record companies. This has not only built a multi-billion dollar industry, but has also established other new industries through the creation of new stars. Through the organization of concerts, exclusive song trials, Karaoke contests, the Karaoke has

assisted in the promotion of the music and entertainment industry, bringing in massive revenue, as well as placing Hong Kong in the forefront of the entertainment world globally.

- Advertising and Promotion - the Karaoke business is one of the key income supplier for the advertising industry. Any change in the Karaoke business will lead to major disruption to the advertising trade, including the advertising agencies, design and production houses, media, etc.
- Equipment Supplier - from audiovisual, to food and beverage, to security equipment, to music software, the Karaoke industry is a major purchaser of the products of these industries.
- Taxation - the Karaoke and subsidiaries industries, as well as the other related businesses generate a substantial taxation income annually for the Government.
- Opportunity for SME - small to medium-sized operations will have the danger of closure if the licensing proposal is not handled properly. This surely is not something the general public would like to see, when local unemployment rate is still standing high and our Government has placed so much focus on providing assistance to the Small and Medium Enterprises.
- Investment Attraction - tight and tough restrictions to the industry will not only lower the efficiency of business operations and increase investment costs. It will also deter existing investors from further contribution, as well as deter prospective investors, local and international, from targeting towards this industry.
- Social Impact - the Karaoke culture is already an integral part of the local entertainment culture, applicable for all occasions and at all levels of the society. If such avenues of leisure and entertainment decline, it may give rise to a multitude of social problems.

In general, any change in the Karaoke trade will impact other industries, including real estate, tourism, advertising, music, entertainment, equipment supply, as well as the labor market and the overall local economy.

Alternative Focus

Whilst the Proposed Licensing System has dedicated so much effort to impose stringent and unrealistic requirements on the trade, we noticed that the absolute requirement of human training and professionalism were totally omitted. We consider the human element to be a critical, flexible and also realistic approach towards ensuring a safe and controlled environment in the Karaoke industry. Take a look at the hotel and airline industry, it is the human factor that they have successfully placed their focus.

Our Recommendation

We would like to reiterate our support to the Government on tightening the regulations in our trade, but we would strongly recommend:

- That a professional company with relevant background in the Karaoke

and/or entertainment industry should be employed to conduct the research, to ensure comprehensive understanding and reporting;

- That the history and background of the case MUST be provided in detailed, bilingual format, for all members of the trade;
- That key representatives from the trade should be invited to participate in the assessment exercise;
- That other related industries, such as music, food and beverage, real estate, etc. should also be consulted, to ensure a true representation of all industries concerned;
- That the ultimate response from all industries MUST be quoted in its entirety, to avoid misunderstanding and misinterpretation;
- That a more detailed, in-depth, diverse and multi-facet report be prepared for presentation to relevant bodies, e.g. Legislative Council, BSPU, etc.

In conclusion, your correspondence and action thus far provided us with an impression that the entire exercise was not carefully thought out, nor was it thoroughly planned before implementation.

In view of the diverse and deep impact any proposed action could have on the Karaoke and entertainment business, many related industries and the local economy, we strongly urge that an in-depth and thorough understanding on the history of the case, as well as close liaison with industry leaders be established, in order to conduct a research which truly reflects the needs of our trade and our community, for the betterment of Hong Kong.

The Karaoke has already become a solid backbone of the entertainment culture of Hong Kong. It forms an integral part towards the local economy, and has been growing steadily and substantially over the years. Today, the Karaoke industry employs well over 10,000 persons, constitutes over 3,000,000 sq.ft. floor space, draws in billions of dollars in revenue, and as mentioned previously, forms the major income source of over 10 related industries as well. Therefore, we urge that any proposed licensing conditions from the Government should and MUST be reviewed and planned carefully.

Yours sincerely

Anthony Lock
Managing Director
California Red Ltd.

cc. Distribution list as per attached in separate page

DISTRIBUTION LIST:

BSPU, Government of the HKSAR (BSPU)
Karaoke Requirements Concern Group (KRCG)
Security Bureau (SB)
Buildings Department (BD)
Fire Services Department (FSD)
Hong Kong Police Force
Food Environmental Hygiene Department (FEHD)
Home Affairs Department (HAD)
Legislative Council Chambers (LECO)
Hong Kong Catering Industry Association (HKCIA)
Association of Restaurant Managers (ARM)
Hong Kong Federation of Restaurant & Related Traders (HK FORT)
Democratic Party
Democratic Alliance for Betterment
Liberal Party
Hong Kong Progressive Alliance
The Frontier

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BY FAX & BY HAND
(Fax: 2723 5660)

October 27, 2000

Environmental Resources Management
21st Floor Lincoln House, Taikoo Place
979 King's Road, Island East
Hong Kong

Attn: Mr. David Arthur
Technical Director

Dear Mr. Arthur

Re: LICENSING THE KARAOKE TRADE

Thank you for taking the time to respond to our earlier correspondence. As it appears, we are both dedicated towards the achievement of the best outcome for the Karaoke and related industries, I am happy therefore to spend more time in contributing our industry's thoughts on the subject to assist you in the task.

Your reply gave us an impression that you are still not very clear on the characteristics of our trade and indeed what is at stake in this study. Various questions we posed to you in our last letter were not answered clearly or directly, and it worries us when you mentioned that many issues we raised are "*beyond the scope of this study*". This precisely reaffirmed our grave concern that this research would be hastily conducted, presented and implemented before all matters have been thoroughly studied and evaluated. We further object to your repeated highlight of that the attractiveness of a regulated industry would reap greater benefits to the trade. This statement gave a misleading impression that we, the industry, are not favorable of regulating the industry.

Let us reiterate here that we are very much in favor of the establishment of regulations for the industry. It is for this precise reason that we are spending much time and effort to contribute our professional industry knowledge to make appropriate recommendation to facilitate the Government to draft the legislation.

In your letter you mentioned that your company has significant expertise in undertaking economic and regulatory impact assessments, however, we are still unclear about your expert knowledge on the Karaoke and related industries. It would be useful if you could quote past case reference here.

You stated that you have provided flexible meeting dates to meet with industry representatives for your research. However, we wish to point out that the three dates suggested were only five working days from the date of your notice, and the meeting time allocated was for the afternoon hours only. Furthermore, the

purpose of the meeting (*termed "seminar" in your correspondence*) was highly unclear and misleading. Indeed you have met with us outside the hours originally suggested, but we wish to point out that the timing was suggested by your company, since the time we requested was allocated for another operator.

During the meeting at ERM, we were told by your representatives that you have been given very short notice by the Government to conduct this survey and that very limited budget and resources were allocated for the study. The scope of your study only focused on the list of your letter dated 12th September 2000 as per enclosed. This worries us that the study would be conducted in a hasty manner without in-depth study.

With regard to the proposed licensing system, apart from the many areas you expressed were beyond the scope of this study, we were alarmed to see the limited scope that you intend to conduct the survey. Based on the draft of the proposed licensing system, the definition of the Karaoke covers a wide spectrum of industries, including the night clubs, restaurants, private clubs, pubs and bars, studio, music boxes, and many other industries. However, we did not see the intention of this study to cover all these related industries.

Further, the proposed licensing system only focused on fire and safety requirements, which does not match with the subsequent Legislative Council Brief and the Proposed Bill dated March 2000. To ensure the comprehensiveness of the study, we suggest that the research should be viewed in various dimensions.

Of all the proposed points, we do not see any clear and precise information provided to the trade to facilitate their contribution of ideas and evaluation of cost and resource impact. It fails to take into account all parties concerned, including the licensing departments, the license holders, the operators, the investors and the related industries.

With regard to the Tenancy Agreement (TA), it appears that ERM is not very knowledgeable on the complex nature of the negotiation of TA in our industry. It is irresponsible to base your imagination of this industry's TA establishment on the practice of other industries. The nature of the business is one of the most important considerations in the negotiation of TA in our industry. Your reply indicated "*a degree of discretion on a case by case basis*" as well as the allowance of operation to continue during renovation. However, it is unclear who will be the parties and indeed how such discretion and determination would be made.

In terms of renovation requirement, according to the consultation paper, the existing facilities would need to be fully demolished for renovation in order to achieve the safety applications. For example, requirements such as 1-hour fire resistance wall would require all walls to be knocked down so that air duct, cabling and wiring as well as the wall surface could be re-constructed. After lengthy conversations with expert industry contractors, it is their professional opinion that it will take approximately three weeks just to demolish the walls and roughly another 1.5 to 2 months for renovation according to the specification. It should also be considered that the renovation time required for a 1,000 ft²

premises would be vastly different from the time needed to refurbish a 30,000 ft² venue.

It is grossly unfair for the trade to have to bear the responsibility of determining the suitability and safety to continue operation during renovation period. Furthermore, it should also be taken into consideration whether the insurance coverage would be affected under such circumstances?

We are of the opinion that it will definitely need more than 4 months from renovation to inspection to approval, before the business could resume operation.

Without going into details concerning the substantial financial impact to the investors and operators of the trade, we query your professionalism when we learn that you are not prepared to conduct a comprehensive study on the potential income and expenditure impact of this exercise. We believe that this should be a crucial part of a professional study of this nature. Your estimation and assessment on items should include the followings:

- * Renovation cost to adapt to legislation requirements
- * Manpower cost
- * Cost of laying-off the employment
- * Cost of rental, management and essential utilities charges
- * Insurance
- * Taxation
- * Lost revenue during renovation
- * Design and other professional fees, etc.

You repeatedly requested us to provide statistics and figures, but as we mentioned, the impact of the legislation would affect not just the Karaoke trade, but also many related industries, including food and beverage, music and record, tourism, and others. These industry figures are not available to us. Further, surely this should be the task of the consultant to collect the facts and figures as well as the expert opinion of the Trade in order to conduct this study?

We totally support the Government's proposal to safeguard the environment of the trade, but we must also draw your attention to the background of the entire exercise.

This study was proposed when a tragic fire occurred in a Karaoke a few years ago. The court's ruling of the incident was that of a vicious arson attack. Apart from this isolated case, we do not know of any other casualty incidents within the Karaoke. This brings up a question - are the existing Karaoke venues really unsafe? Without any scientific research and test result, how did the safety requirements set by the government? And will your proposed study guarantee a safer establishment?

In conclusion, we would like to reiterate our recommendations, as previously stated in our last correspondence, as follows:

- That a thorough and in-depth research be conducted - a research that truly reflects the needs of our trade and our community, to include financial impact

on the trade, detailed renovation requirements, effect to other industries and the community, etc.;

- That the history and background of the case MUST be provided in detailed, bilingual format, for all members of the trade;
- That key representatives from the trade should be invited to participate in the assessment exercise;
- That other related industries, such as music, food and beverage, real estate, etc. should also be consulted, to ensure a true representation of all industries concerned;
- That the ultimate response from all industries MUST be quoted in its entirety, to avoid misunderstanding and misinterpretation;
- That a more detailed, in-depth, diverse and multi-facet report be prepared for presentation to relevant bodies, e.g. Legislative Council, BSPU, etc.

Last but not the least, we wish to reiterate once again the necessity not to under-estimate the potential diverse impact of this study on the economy and the community. Today, the Karaoke has become a solid backbone of the entertainment culture of Hong Kong. It forms an integral part of the local economy, and has been growing steadily and substantially over the years. The characteristics of the trade and relevant industry definitely need to be understood thoroughly and an opened mind and a multi-dimensional point of view must be adopted in the compilation of the licensing proposal.

Yours sincerely

Anthony Lock
Managing Director
California Red Ltd.

Distribution List:

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Members of the second Legislative Council
Hong Kong Catering Industry Association (HKCIA)
Association of Restaurant Manager (ARM)
Hong Kong Federation of Restaurant & Related Traders (HKFORT)
Democratic Party
Democratic Alliance for Betterment
Liberal Party
Hong Kong Progressive Alliance
The Frontier