

**Administration's Response to the letter dated 18 October 2001
by the Karaoke Requirements Concern Group
commenting on LC Paper No. CB(2)1547/00-01(01)**

We have the following comments on the letter dated 18 October 2001 by the Karaoke Requirements Concern Group ("the Concern Group") commenting on the Administration's Response on the six articles of Professor W K CHOW (LC Paper No. CB(2)1547/00-01(01).)

2. First of all, we would like to point out that we have no record of receiving a copy of the article entitled "Journal, Volume 3, Number 2, p.59-66, 2001 (Fire Safety Requirements in Karaoke Establishments : Comments on the New Karaoke Establishments Bill) as stated in page 1 of Concern Group's letter.

3. For the ease of making reference to various articles in this submission, the following denotations will be used:

Article A International Journal on Engineering Performance-Based Fire Codes, Volume 1, Number 2, p.59-70, 1999 (Review on Safety Codes relating to Karaoke Establishments and Fire Safety Management)

Article B International Journal on Engineering Performance-Based Fire Codes, Volume 2, Number 3, p.104-123, 2000 (A Demonstration on Working Out Fire Safety Management Schemes for Existing Karaoke Establishments in Hong Kong)

4. We cannot agree with the allegation that lines 1 to 4 in paragraph 4 of the Administration's Response to the six articles by Professor CHOW had misconstrued Professor CHOW's opinion. In fact, the quotations in Concern Group's letter of what Professor CHOW said are exactly what we described in lines 1 to 4 i.e. studies/further investigation should be carried out to provide research data to support the requirements proposed.

5. Karaoke establishments (KE) are often partitioned into small cubicles which are accessed through long and winding passages. As patrons' judgement and awareness of safety may be affected by consumption of liquor, immersed in singing and chanting, there exists substantial life risk in these premises in the event of an outbreak of fire. With regard to corridor width, Professor CHOW agrees that "Obviously, the escape rate would be faster in a wider corridor under the same evacuation plan" (4th line, 2nd paragraph, 2nd column, page 64 of **Article A**).

Taking into consideration the special characteristics of KE and that patrons may be under the influence of liquor as mentioned above, the requirement is considered to be prudent though not supported by scientific research.

6. In Part 3 of *Article B*, Professor CHOW identifies some situations that may occur if fire safety management is not being carried out in the establishments. Paragraph 5 of the Administration's Response on the six articles of Professor CHOW only stressed the special characteristics of KE and the problems in case of fire. In fact, Professor CHOW indicated similar views in 1st line, 3rd paragraph, 1st column, page 59 of *Article A* that "Surprising, there are no specific regulations on karaoke safety".

7. Professor CHOW mentions in Part 11 of *Article B* (page 113) that "Karaoke Establishments can be safe in accidental fires if there is proper fire safety management". However a fire safety management cannot be regarded as equivalent to the more reliable fire safety requirements of the separation by walls having a fire resistance period of an hour.

Conclusion

8. There are two approaches to achieving fire safety, namely the prescriptive and the performance based approach. A prescriptive code which sets out fire safety requirements for generic use or application is generally developed and modified based upon previous successes and failures.

9. An alternative to the prescriptive approach is the "fire engineering approach" which is based on scientific and engineering principles. As described in paragraph 12 of the Administration's Response to the six articles of Professor CHOW, we are always prepared to consider proposals made under the fire engineering approach in respect of fire safety provisions for KE.

Security Bureau
November 2001

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