

香 港 酒 店 業 主 聯 會  
**The Federation of Hong Kong Hotel Owners Limited**

LC Paper No. CB(2)302/02-03(02)

Our Ref: 103/02/ML

By Fax & Post

Nov 8, 2002

Clerk to Bills Committee  
 on Fire Services (Amendment) Bill 2001

Dear Sirs,

Re : Proposed Bill of Fire Services (Amendment) Ordinance 2001

We refer to the above and the proposed amendment on the definition of "fire service installation or equipment" under the following ordinances (the "Definitions") therein :

1. Section 2 of the Fire Services Ordinance (Cap. 95);
2. Section 2(1) of the Public Health and Municipal Services Ordinance (Cap. 132);
3. Regulation 2 of the Places of Public Entertainment Regulations (Cap. 172 sub leg.) and
4. Section 3(1) of the Fire Safety (Commercial Premises) Ordinance (Cap. 502).

The Definitions are basically the same. It is proposed to widen the scope of the Definitions by including sub-sections (d) and (e) as underlined below:

"fire service installation or equipment" means any installation or equipment manufactured, used or designed to be used for the purposes of-

- (a) extinguishing, attacking, preventing or limiting a fire;
- (b) giving warning of a fire;
- (c) providing access to any premises or place for the purpose of extinguishing, attacking, preventing or limiting a fire;
- (d) facilitating the evacuation from any premises in case of fire;
- (e) providing a stand-by power supply to an installation or equipment under paragraphs (a) to (d) in the event of the loss of normal power supply.

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All correspondence are to be addressed to the Executive Director

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Under the above Ordinances, the operators, occupiers or owners of the applicable premises are required to provide fire service installations or equipment as directed by the relevant enforcement authority. We understand that the installation and maintenance of a stand-by power supply (assume this is the emergency generator supply. If not, please clarify) is very costly which most affected persons cannot afford. Perhaps you will appreciate that the likely costs as such would be a critical consideration of the affected persons in carrying on their business.

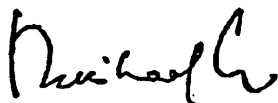
We are particularly concerned about that the proposed widening of the scope of the Definitions as aforesaid may cause heavy financial burden to the affected sectors and industries at a time of economic depression. It would be useful for you to clarify the position by identifying the proposed circumstances under which an installation of stand-by power supply is or may be required by reason of the proposed amendments.

In addition, we hope you would also address on the following issues in light of the proposed amendment of the Definition under each of the above Ordinances:

1. the legislative intention;
2. the likely financial impact on the affected sectors and industries; and
3. the likely impact on the existing license holders and the terms under which they may apply for a renewal of license under the relevant ordinances. For instance, "Hotel Licence" under the Hotel and Guesthouse Accommodation Ordinance.

We look forward to your timely reply and in any event no later than Nov 14, 2002.

Yours faithfully,



Michael LI  
Executive Director