

LETTERHEAD OF FAIRVIEW PARK PROPERTY MANAGEMENT LTD.

17th May 2001

Clerk to the Subcommittee on review
of the Building Management Ordinance
Legislative Council Secretariat
3/F Citibank Tower, 3 Garden Road
Central, Hong Kong

BY FAX & POST
FAX NO.: 2509 9055

Dear Sirs,

Review Of Building Management Ordinance:

Mandatory Safekeeping of Building Drawings and Records

We are writing in response to your invitation to provide input for the next round of amendments to the Building Management Ordinance (BMO). We understand that under the current Ordinance, there are requirements to safekeep accounting records. Furthermore, it seems that Government is considering amendments to the BMO in order to make financial provisions for large scale repairs to buildings as they age in the future.

In addition to the keeping of accounting records, of even more fundamental importance to good building management, is the keeping of general building plans, structural plans, and building services (M&E) plans -- collectively called "as-built record plans". While it would be helpful to make financial provisions for large scale repairs to buildings, these repairs would be better executed with accurate sets of updated drawings.

In Hong Kong, a casual polling of most management companies will show (even in the case of the DMC manager) that complete sets of drawing are not always available, much less updated ones. As the building ages, and there are changes of both owners and management companies, lack of proper records become increasingly problematic.

Problems of maintenance and decoration works without drawings:

1. Without drawings, residents may unknowingly remove structural walls during decoration or accidentally damage drainage systems and other parts of the building.
2. Repairs undertaken without the benefit of drawings are inefficient, costly and may cause unknown damage to the building infrastructure.
3. Fire service improvements are difficult to carry out without M&E drawings.
4. Slope and site formation records are needed for proper slope maintenance.
5. Emergency repair works start to occur frequently when buildings become over 15-20 years old. Yet at this very time, it becomes increasingly difficult to obtain such drawings from the Buildings Department (B.D.). By then, such old drawings are stored in archive or perhaps even missing, as in the case of Fairview Park.

Difficulty of obtaining drawings:

1. It takes several weeks if not months to apply for drawings from B.D. Such time delay is too long for emergency repairs.
2. It can be expensive to apply for a full set of drawings from B.D. as one drawing alone costs hundreds of dollars and the full set will consist of many drawings.
3. A professional is required to go personally to B.D. to select the drawings because B.D. will not sort out the required drawings for the applicant. Furthermore, the set available at B.D. may be incomplete.
4. Most architectural and engineering firms do not keep drawings that are over 7 years old. Such drawings are also the copyright property of these firms. On the other hand, developers are even more reluctant to make drawings available.

Mandatory keeping of drawings:

Just as the BMO requires keeping of accounting records, we feel it is even more important that the aforementioned "as-built record plans" be carefully kept. This is a cumbersome job that would not be faithfully undertaken for years on end, unless required by law. Developers should be required to provide the building manager with a complete set of drawings. Drawings might also be kept by means of a technology that will remain accessible in the decades ahead.

In turn, building managers should be required to keep these drawings in good condition, professionally updated when major changes occur, and to pass the intact sets of drawings on to the next manager. Copyright issues should also be sorted out if residents need to make copies of the drawings for their own use.

A final advantage would be that B.D. could save on the resources required constantly to retrieve drawings every time new owners require them.

Yours sincerely,
For and on behalf of
Fairview Park Property Management Ltd.

M. W. K. Wong
Director

MW/sw