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January 21, 2008

Legislative Council Secretariat
3rd Floor, Citibank Tower
3 Garden Road, Central
Hong Kong

By POST and E-MAIL

Attn: Miss. Mandy Poon
Clerk to Panel

Dear ,

Panel on Environmental Affairs – Meeting on January 28, 2008
Comment on the Consultation Paper on
A Proposal on Mandatory Implementation of the
Building Energy Codes

Thank you very much for inviting Green Council to participate in the Panel on Environmental Affairs Meeting scheduled on January 28, 2008 regarding the captioned consultation. Green Council is very pleased to submit views as follows:

General Comments

- (a) We support the Government's proposal on the mandatory implementation of the Building Energy Codes (BECs). Given Hong Kong's continuously degrading air quality, Green Council fully agrees that the Government should actively pursue initiatives to reduce electricity consumption as one of the effective means to combat against the global threat of climate change.
- (b) Recognizing that reduction of energy consumption counts on both supply-side and demand-side management, we strongly suggest the government to launch more public education programmes to focus on the imminent need and means to reduce electricity consumptions.
- (c) We are glad to see the recent progress made on the Agreement on the Control of Power Companies. We look forward to seeing more use of renewable energy in Hong Kong. .../2

Specific Comments

- (d) Paragraph 18 – We suggest putting buildings with significant energy consumption under control by the mandatory scheme in phases. For example, you may wish to apply the control to commercial, industrial, government and institutional buildings as the first batch and then extend the scheme to residential buildings.
- (e) Paragraph 19 – Apart from new buildings which should all be covered under this mandatory scheme, existing buildings should also be controlled based on their energy consumption. It is suggested to make reference to overseas practice (such as Australia and Singapore) to require the existing buildings which will undergo major alternations, additions or changes of use to compile with the codes. To facilitate compliance by the regulated buildings, the Government may consider providing incentives like monetary loan and recognition awards.
- (f) Paragraph 20 – We concur with the proposal of adopting the recently updated BECs for the HKEERSB as the mandatory standards or incorporate a regular review system to uplift the standards with reference to the prevailing international standards as far as possible. By doing these, the regulated buildings will keep their energy efficiency performance in line with the current worldwide trend.
- (g) Paragraph 21 Section (c) - We fully agree with the proposed tiered arrangement. The minimum standard will facilitate most participating buildings to compile with the requirements. On the other hand, proactive performers will also be recognized for their distinctive achievement by means of recognition scheme such as Energy Efficient Award. Alternatively, the Government may consider granting some kind of Energy Efficient Labels or Energy Marks to those building with good energy saving performance.
- (h) Paragraph 21 Section (d) - We support the self-declaration arrangement. This mechanism would enhance the mutual trust between the Government and the participating buildings while minimizing the enforcement resources. On this point, Registered Professional Engineers of environmental discipline should also be recognized by EMSD as recognized professionals.
- (i) Paragraph 21 Section (g) - Upon renewal of the Certificate of Compliance, the Government may demand for an incremental tightening of the energy efficient standards with a view to enhancing the performance of the regulated buildings.
- (j) Paragraph 21 Section (k) – It is proposed to require all the regulated non-domestic building owners to conduct energy audits by recognized professionals once every 5 years. This will enable the owners to identify any deterioration in the performance of their energy systems and facilitate early identification of any possible technical problems within their systems. .../3

- (k) Paragraph 21 Section (m) – The Government may consider reviewing the BECs every 5 years so as to keep abreast with the latest technical and policy development around the world.

The above summarizes the position of Green Council on the mandatory implementation of the Building Energy Codes. We are more than happy to further discuss relevant issues on January 28, 2008 at the Panel on Environmental Affairs meeting.

Yours Sincerely,

Linda W P Ho
Chief Executive Officer