



香港建築師學會  
The Hong Kong Institute of Architects

**Public Consultation on Mandatory Implementation of Building Energy Codes  
Preliminary Response of The Hong Kong Institute of Architects**

**A. Overview**

The Hong Kong Institute of Architects (HKIA) opines that the Hong Kong SAR Government should set out a holistic framework to effectively address the issues of energy efficiency and carbon emissions in buildings with a clear target and milestone. Building sector constitutes one of the major contributors in terms of energy use and carbon emissions. BOTH “regulatory push” and “market pull” should be formulated timely and synergistically in order to yield effective results in response to the critical global and local environmental challenge facing us.

The proposed mandatory implementation of Building Energy Codes (BECs) is considered one of the measures that we long for with a view to creating market transformation towards sustainability in Hong Kong.

**B. Response to 6 Key Consultation Points**

In response to the list of 6 key questions as highlighted in the consultation document, the preliminary views of HKIA are as follows:

1. Regulation

Similar to most other progressive cities, we agree that HK should pursue the mandatory implementation of BECs without further delay.

2. Coverage

We in principle support the categories of buildings to be widely covered as per the proposed scheme in the consultation document, i.e., commercial buildings and communal areas of residential / industrial buildings.

In this connection, the Government should also take the lead to require all public and public funded projects to implement BECs.

3. Exemption

A reasonable mechanism should be in place to allow application for exemption from the mandatory scheme. The exemption may be related to the practical constraint of specific function/design, but also to accept reasonable equivalence. For instance, to minimize unnecessary resources duplication, exemption should be considered for those buildings already certified with a recognized comprehensive environmental performance assessment scheme / green building rating system.

4. Existing Buildings

For effective environmental gains in Hong Kong where the stock of existing buildings represents the majority, requiring the existing buildings to improve their energy efficiency performance is indispensable.

In this connection, to set a good example, the Government should take the lead to require all public and public funded existing buildings to improve their energy efficiency performance.



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#### 5. Existing Buildings: Compliance Option

In association with item 4, the following options are appropriate for further consideration:

- requiring compliance with the BECs only when they are major retro-fitting works, such as when the works involve replacement of major components of the types of installations covered by the BECs or when the coverage of the retro-fitting works exceed a certain percentage of the building's GFA; and
- mandating conduct of energy audits and display of the audit results.

#### 6. Tiered-system

As a general direction, the following are considered appropriate:

- adopt the recently updated BECs for the HKEERSB (HK Energy Efficiency Registration Scheme for Buildings) as the mandatory standards;
- incorporate a regular review system to uplift the standard with reference to the prevailing international standards as far as possible; and
- introduce a tiered arrangement, i.e., with the BECs issued by the EMSD as the minimum standards applicable to all covered buildings, and a higher set of standards be introduced to give recognition to buildings that achieve better energy efficiency to encourage superior environmental performance.

In line with the progressive aspiration as some other leading societies, a well-established tiered arrangement to promote and recognize higher energy performance towards zero-emissions should be formulated. As in other progressive countries such as UK and US, appropriate incentive for the owners/occupants should also be dovetailed to accelerate the market transformation.

In this connection, the Government should also take the lead to have a more innovative funding mechanism for promoting and enabling all public and public funded projects not only to comply with the minimum standards but also to achieve superior environmental performance.

### C. Way Forward

In principle, HKIA strongly supports the proposed mandatory implementation of BECs in Hong Kong, which should be in place as soon as practical. We suggest the Government to work out the details of the implementation mechanism and strategy, in particular on the details of tiered award system and enforcement actions for non-compliance for further public consultation.

HKIA also notes that the Annex A of the consultation document briefly describes Singapore's legislative practice of green building rating system (Green Mark Scheme) in addition to the minimum energy efficiency requirements. Such a holistic approach is in fact the international trend for promoting and recognizing comprehensive environmental performance assessment scheme in buildings, which addresses not only the issue of energy efficiency and carbon emissions but also other critical concerns of resources depletion and environmental livability. Besides Singapore, cities in Japan, Europe and North America have already advanced to mandate green building rating for the private-sector developments, in addition to requiring all public / public funded projects to fulfill certain level of rating in the first place.

To conclude, for creating a quality and environmentally sustainable city to live and work, HKIA welcomes the proposed mandatory implementation of BECs. We further look forward to seeing a more holistic intervention strategy by the Government involving both "regulatory push" and "market pull" to urgently upgrade the energy and environmental performance of both new and existing buildings in Hong Kong.