



Chairman & Members  
Panel on Environmental Affairs  
Legislative Council

22 January 2008

Dear Hon. Audrey Eu Yuet-mee and Members,

**Mandatory Implementation of the Building Energy Codes (BECs)**

“A Proposal on the Mandatory Implementation of the Building Energy Codes” has been issued by Environment Bureau and Electrical and Mechanical Services Department in order to introduce legislative control on the designs, efficiency and specification of energy installations and consumption for specified types of buildings in Hong Kong. Green Power would like to express our points of view as a local charitable green group regarding the aforementioned proposal.

- (1) We agree that the mandatory implementation of the BECs should be pursued because:
  - (a) Residential and commercial sector account for 56% of total energy consumption in Hong Kong in 2005. In the other words, significant portion of energy is consumed by the buildings in Hong Kong and promoting building energy efficiency can save considerable amount of energy.
  - (b) High building energy efficiency should be achieved through good architectural designs of building and energy devices. However, currently property developers lack incentives to fully implement BECs because their investment in implementation of BECs will not be paid back in the operation phase of the building as they are usually not the future owners or occupants.
  - (c) Retro-fitting energy saving devices for existing building is not only less cost effective, but also sometimes technically not feasible.
  
- (2) Categories of buildings that should be covered under this proposal should include:
  - (a) High-rise commercial buildings.
  - (b) Large commercial/residential buildings.
  - (c) Public and private housing estates.
  - (d) Industrial buildings with substantial consumption of energy.

- (3) Regarding the existing buildings of categories mentioned in paragraph (2), energy efficiency auditing should be conducted to gauge their energy efficiency performance. For those buildings that require improving their energy efficiency significantly, the government should assist the owners technically and/or financially. Such practices and associated works can be undergone together with other major refurbish works for existing buildings such as common space renovation, electric installations, etc, in order to save resources, lower the nuisance to occupants and more importantly, achieve better planning.
- (4) Moreover, Green Power is concerned about some improper consumption of energy in buildings. Some buildings have installed high-powered searchlights pointing upwards to the sky. We consider such use is unnecessary and wasteful. Some outer-wall lighting of buildings, for decoration or for illumination of advertisement panels, are also necessarily too bright and the lighting hours are too long that generate glare nuisance to building occupants and waste energy. We urge the Administration to take action to combat the wasteful uses of energy in buildings.

Thank you very much for your kind attention. We sincerely hope that the Administration can uphold their obligation to save precious energy resources, reduce greenhouse gas emission and improve our environment through promoting wise use of energy.

Yours faithfully,

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