

## **Public Consultation on Mandatory Implementation of Building Energy Codes**

### **Preliminary Response from the Professional Green Building Council (PGBC)**

The PGBC strongly supports the Government's proposal on the mandatory implementation of the Building Energy Codes (BEC). This is a positive step forward in improving the energy efficiency of buildings in Hong Kong and is in line with the global trend to reduce energy consumption and greenhouse gas emission. The proposed legislation will also complement those market driven energy efficiency initiatives.

#### Coverage

PGBC is of the opinion that the proposed legislation should not only cover commercial buildings and communal parts of residential and industrial buildings, but also other categories of buildings such as hospitals, transport terminals / stations and educational premises, etc, all of which have high energy saving potentials.

#### Tiered System

PGBC is in support of the proposed tiered system as it will encourage the application of innovative design and promote a higher energy efficiency standard above the code requirements.

#### Existing Buildings

Existing buildings have very high potential in energy saving because of the large building stock in Hong Kong. However, they pose the biggest challenge in the enforcement of the proposed legislation due to the difficulties in defining what constitutes major retro-fitting works and in identifying a responsible party for those buildings of multiple ownership.

A flexible approach should be adopted to allow exemption of certain aspects of the BEC because there may be physical limitations in existing buildings that make the full compliance of the BEC not practicable or cost effective.

#### Applicable Standard

The PGBC agrees that the recently updated BEC should be adopted as the mandatory standard. However, since the codes were originally drafted for new buildings, they should be revised and amended as appropriate to make them suitable for existing building applications.

PGBC also concurs that the codes should be regularly revised and uplifted as appropriate with reference to the prevailing international standards and the proposed 5-year interval is considered acceptable.