

Dear sir

I have gone through the proposed amendment and the Ordinance (Cap 403), my comments are as follows:

1. In the paper file ref: EP 351/O4/34, under the paragraph 10. (b) of Justifications, it is mentioned that the amended Ordinance shall extend the “banning” of portable fire extinguishers to those containing other fully halogenated chlorofluorocarbons, HCFCs,FSICA requests the Subcommittee to clarify that whether the “banning” means the banning of import or the banning of use.
2. In the paper file ref: CB(1) 2671/08-09(02), page no. 0006, it is mentioned that “portable fire extinguisher” means a portable fire extinguisher that contains a scheduled substance listed in Part1, 2, 3, 8 or 9 of the Schedule to the Ordinance. It is understood that the current Ordinance only refers to Part 2 of Schedule to the Ordinance. FSCIA believes that the extension needs to extend to cover those substance listed in Part 8 of the Schedule to the Ordinance, however, FSICA is not aware of any portable fire extinguishers used in Hong Kong containing substance listed in Part 1, 3 and 9. Therefore FSICA requests the Subcommittee to clarify why Part 1, 3 and 9 are included.

Regards,
Peter
Chairman
FSICA

The Association of Registered Fire Service
Installation Contractors of HK Ltd
Room 1801, 18/F, Tung Wai Commercial Bldg
109-111 Gloucester Road, Wanchai, Hong Kong
Tel: 2390 6368 Fax: 2191 7853 Email: info@fsica.org.hk