



香港電器工程師商會有限公司

HONG KONG ELECTRICAL CONTRACTORS' ASSOCIATION LIMITED

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香港機電工程師聯會創會成員 A Founding Association of The Hong Kong Federation of Electrical and Mechanical Contractors

Our Ref: GO/WC/403

By Mail and by Fax

Your reference CB1/BC/2/09

29th January 2010

Clerk to Bills Committee
Legislative Council Secretariat
3rd Floor, Citibank Tower
3 Garden Road, Central
Hong Kong.
Attn: Miss Mandy POON

Re: Buildings Energy Efficiency Bill

We are in strong support of the Building Energy Efficiency Bill and the associated Building Energy Code. However we take exception to the composition of the appeal board panel under clause 34 of the Bill.

Whilst the Bill puts the property owners to be responsible for compliance with the Bill and entrust the Certified Energy Assessors to certify compliance on their behalf under the Bill, we submit that the electrical and mechanical specialist installation contractors will be at the receiving end to ensure that their installations in fact technically comply with the Bill under their installation contracts with the owners (or subcontracts via Main Contractors). Hence electrical and mechanical specialist installation contractors are effectively de facto market players and stakeholders.

At present there are 6 codes – electrical, lighting, air-conditioning, lift & escalator, performance-based code and energy audit. The proposed membership of the appeal board panel drawn from the electrical, mechanical, building services and environmental disciplines of the Hong Kong Institution of Engineers as well as the Engineers Registration Board will provide suitable representation for the Certified Energy Assessors as well as the relevant design professionals. Nevertheless the appeal board panel membership should be extended to cover the relevant electrical & mechanical specialist installation contractors. In this connection we submit that membership should be drawn from our Hong Kong Electrical Contractors' Association in relation to the electrical & lighting codes as well as from our umbrella organization The Hong Kong Federation of Electrical & Mechanical Contractors Limited in relation to the performance-based code & energy audit.

We shall be glad to further our submission in your public hearing as appropriate.

Yours sincerely,

William CHAN JP

President