

**Enclosure****Legislative Council  
Bills Committee on Buildings Energy Efficiency Bill  
Views from the Hong Kong Institution of Engineers  
on Buildings Energy Efficiency Bill****General**

In response to the invitation from the captioned Committee, the Hong Kong Institution of Engineers (HKIE) is pleased to provide views below on the proposed mandatory implementation on Building Energy Efficiency Bill (the Bill) for the consideration of the Committee.

2. The Institution is in favour of the implementation of the proposal for its positive influence on local air quality improvements and the alleviation on the adverse effect of climate change. The proposal itself is a pivotal element in the design of a long-term sustainable city plan.

3. Apart from the positive environmental impacts mentioned, with proper administration, the mandatory scheme will also bring economic benefits to Hong Kong arising from energy conservation as well as new business opportunities for registered energy assessors and others workers relating to energy efficiency compliance.

4. Noting that mandatory compliance with minimum building energy efficiency standards is widely practised overseas; it is therefore necessary for Hong Kong to meet international standards. The HKIE believes that the enforcement of the mandatory scheme will be able to enhance Hong Kong's reputation as an environmentally responsible city and its competitiveness as an international business and financial centre.

**Building Energy Codes (BECs)**

5. The Institution fully supports the Bill, of which the fundamental concept of this is to encourage reduction of unnecessary energy use so as to ensure a better and effective application of energy. We believe that immediate energy conservative actions, as proposed in the Bill, can help to shape a better future of the city. To achieve an effective implementation, it is suggested that the Bill should give a clear definition of building energy efficiency standards and requirements, together with its

interrelationship with ‘Energy Audit’, so that a set of comprehensive and explicable codes and requirements can be properly followed and adopted by related industries and general public.

6. We would be glad to witness a more mandatory approach of the impositions as suggested in the Bill that the responsibility of developers and owners would be reinforced to comply with the requirements. Notwithstanding, the HKIE opines that a 10-year energy audit cycle is too long that we recommend the audit intervals should be shortened to once per 5 years time.

7. In the enforcement of BECs, the Code of Practice (CoP) plays a critical role in supporting its implementation. Therefore, the Institution considers that EMSD should form a task force with stakeholders to conduct regular reviews on the CoP every three years or less in order to maintain its currency and applicability in respects of technical embracement as well as operational requirements since technology advancement progress rapidly over time nowadays.

8. In regard to the ‘Certificate of Compliance Registration’ for new buildings and the ‘Form of Compliance’ for major retrofitting works, considerations should be taken to ensure that they are properly matched with the Code of Practice. In addition, to avoid confusion, the ways in which the ‘Energy Audit’ integrate or relate to the Code of Practice must also be explained and clearly stated.

9. Viewing that the term “Energy Audit” is unclear and being often misused by the public, the HKIE proposes that the term should be repositioned and renamed as “Energy Efficiency Assessment”. This could help to eliminate any misunderstanding and misconception in the nature of the audit, and thereby it could promote a popular use of Energy Efficiency Assessment as a compliance check of energy use efficiency of a development in full. Energy Audit Form should also be renamed as Energy Efficiency Assessment Form for clarity. For those forms and certificates need to be displayed, the format and content of which should be carefully designed in such way that the purposes and implications conveyed through those papers can effectively and clearly be understood by the public and concerned parties.

### **Registered Energy Assessors**

10. The HKIE concurs that Energy Audits for buildings must be carried out by Registered Energy Assessors who possess relevant post-qualification working

experience and knowledge. In view of the profession nature required for the audit work, the HKIE suggests that the criteria for Registered Energy Assessors and the details of registration should be listed out clearly. Regulations and guidelines should also be made for Registered Energy Assessors to help them suitably and appropriately discharge their responsibility.

### **Public Engagement for the compliance with the BECs**

11. The proposal itself will not be carried out successfully without the support from the community. Therefore, broadcasting and projecting the benefits of the BECs mandatory compliance to the public would be of crucial importance to encourage public participation in complying with the BECs. EMSD should play an active role in public engagement, with an aim to promote social responsibility among end users and community stakeholders. In the public engagement exercise, education should include, but not limited to, the process and mechanism of the audit, different types of certificates and forms involved, responsible professionals and stakeholders, etc. that these information should be clearly expounded to the community.

### **Conclusion**

12. The HKIE shares with the community the common aspiration in achieving an environmental friendly society with the best energy utilisation. A low-carbon economy cannot be established without a comprehensive energy plan that is jointly recognised by different stakeholders. The Institution hence advocates the Bill to be enacted without delay and is pleased to offer professional contributions in such enhancement.

13. Besides, we believe that the Bill endorsement is a preliminary step towards raising environmental awareness of the public. More measures and ways should be considered and taken in the future to ensure a better building energy performance such that an enduring and sustainable future of the city could be nurtured ultimately.