

The Chartered Institution of Building Services Engineers

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CB(1) 1325/09-10(01)

Mr Franco Kwong
for Clerk to Bills Committee
Legislative Council Secretariat
Legislative Council Building
8 Jackson Road
Central
Hong Kong

Dear Mr Kwong

The Chartered Institution of Building Services Engineers has been expressing support of this draft bill which is in line with the effort of the Institution to promote reduction of energy consumption. In view of the rapidly increasing consumption of energy in the past decades which drives the environment towards an uninhabitable condition and natural energy resource towards extinction, there is a need to take positive action to heed the consumption of energy. Whilst an apparent means to reduce energy consumption is to lower the demand such as for comfort or commercial activities, another means is to adopt more energy efficient systems. We believe that the draft bill will contribute towards the latter means to reduce energy consumption. Accordingly, the Institution has been maintaining dialogue with the government during the process of the establishment of this draft bill with the objective of preparing our members to contribute towards the execution of this bill in future with respect to provision of engineering support.

During the discussion on 9 Feb 2010, we have observed the various views being raised and would like to provide our feedback as follows :-

1. Adopting 200sqm instead of 500sqm of renovation areas as a criteria for mandatory compliance of BEC
There should be due consideration of technical practicability since it may not be practicable to require building infrastructure to be upgrade along with small scale renovation which may render difficulty for full compliance of BEC, a possibility may be to require reduced level of BEC compliance for smaller scale renovation.
2. Inclusion of building external lighting into BEC
We concur that building external lighting should be included BEC and support the government's current effort to carry out investigation of the appropriate criteria for controlling external lighting power consumption to prepare for inclusion of such into BEC in due course.
3. Adopting 5 years instead of 10 years duration for renewal of energy audit certificate
We generally agree with the opinion gathered by the government in the public consultation in the initial stage of establishment of the draft bill that 10 years duration for renewal of energy audit certificate for existing building is appropriate considering the general cycle for change of building technology and mode of business operation of buildings.

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4. Extension of acceptable qualification for energy auditor to non-engineering profession

Whilst some non-engineering professions may be able to benchmark building energy usage against established standards, it would be relatively difficult for non-engineering professions to identify from the energy audit observations the opportunities and means to reduce energy consumption. In this perspective, our opinion is that the consideration of widening the coverage of acceptable qualification for energy auditor should be viewed in conjunction with the objective of energy audit for existing buildings as required in the draft bill to let building owners / operators aware of opportunities and means to reduce energy consumption which together with various motives (eg., commercial incentives of reducing operation cost / satisfying corporate tenant expectation / public image, government incentives such as subsidy for capital investment and tax relaxation) will hopefully drive building owners / operators to implement such energy saving measures.

We are enthusiastic about the forthcoming launching of this draft bill which we believe will benefit the society and would suggest that there be a road map for upgrading the bill in future such as with respect to widen of coverage and adopting of more stringent criteria (eg., item 1 and 2 above).

Yours faithfully,

Victor Leung
Immediate Past Chairman
The Chartered Institution of Building Services Engineers
Hong Kong Branch