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香港機電工程師聯會  
The Hong Kong Federation of Electrical  
and Mechanical Contractors Limited

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Our Ref: FEMC-10-EXA-011

29 March 2010

Clerk to Bills Committee,  
Legislative Council Secretariat  
3/F Citibank Tower,  
3 Garden Road, Central, Hong Kong.

Attn: Miss Mandy Poon

Dear Sirs,

**Re : Buildings Energy Efficiency Bill**

The Hong Kong Federation of Electrical and Mechanical Contractors Association and the following constituent associations are in strong support of the Building energy Efficiency Bill and the associated Building Energy Codes. 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 Registered 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 and escalator, performance-based code and energy audit. The proposed members of the appeal board panel drawn from electrical, mechanical, building serviced environmental disciplines of the Hong Kong Institution of Engineers as well as the Engineers Registration Board will provide suitable representation for the Registered Energy Assessors as well as the relevant design professionals. We consider that the appeal board panel members should be extended with expertise on the practical concerns and installations aspects. In this connection we opine that it should include the concerned constituent associations of The Hong Kong Federation of Electrical & Mechanical Contractors Ltd.

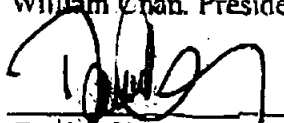
We shall be glad to further you with details if necessary.

Yours faithfully,

  
Otto Poon, President of HKFEMC

  
H S Kuok, President of LECA

  
William Chan, President of HKECA

  
Daniel Chong, President of ACRA