

香港建造商會的信頭

Letterhead of The Hong Kong Construction Association Ltd

**Electricity (Amendment) Bill 1999, and
Electricity Supply Lines (protection) Regulation
Submission of the Hong Kong Construction Association**

1. The HKCA considers the criminal offence and imprisonment sanctions of the Bill and proposed Regulation unreasonable because:
 - a. It is unfair that the contractors and not the electricity suppliers will be subject to criminal offence and imprisonment sanctions. Electricity suppliers hold the information of the electricity installations. If they are not co-operative to give the information, or the information is not accurate the danger of electricity supply lines being damaged will exist.
 - b. The impact of damage to electricity supply lines is likely to be less than to gas pipes. Damages to gas pipes may cause explosions with widespread physical damages and personal injury. The damage to electricity lines is likely to be economic only.
 - c. Damage to electricity lines is likely to expose the concerned contractors to civil liability which, if deterrence is necessary, should be sufficient to regulate the contractor's actions.
 - d. If a larger deterrence is needed a heavy fines will be sufficient.
2. The HKCA is concerned about the availability of sufficient Competent Persons and the qualification & training needed for them. The Government should consult with the industry and make sure that there are sufficient qualified Competent Persons before the Regulations come into effect.
3. There should be sufficient leading period before the Regulations are effective to allow the industry to become familiar with the Regulations and Code of Practice. This date should be decided after consultation with the industry.