

LETTERHEAD OF THE HONG KONG E&M Contractors' Association Ltd.

12 December 1998

The Honourable Ron Areulli, JP
c/o Woo Kwan Lcc & Lo Solicitors
2718 Jardine House
1 Connaught Placc
Central
Hong Kong

Fax:2596-0757

Dcar Ron.

Factories and Industrial Undertakings (Confined Spaces) Regulation

I refer to LC paper no. CB(2)798/98-99(01) regarding the above. We have the following comments:-

1) Reg. 9 (p. 10)

A two-day training program for those “certified workers” who are required to wear or use the breathing apparatus when working in a confined space is definitely not enough, considering they would not posscss any prior knowledge. Also the regulation does not specify the competency and training requirements related to wearing breathing apparatus which is known in the industry as a specialist rather than a “certified worker”.

2) Rcg. 10(2)(p.11)

This regulation spccifics a lot of rescue and safety requirements, however would the workers staying outside of the confined space be taking the responsibility to rescue those workers that are facing danger inside? If the answer is yes, this worker may need to be trained such as a First Aider (plus knowledge in using such rescue as apparatus and equipment) rather than the so-called “certified worker”, and hence this area must be clearly defined. Also in the industry, apart from FSD and the Ambulance Unit, very few, had received such kind of training and knowledge in using such specified apparatus and equipment.

The Hong Kong F&M Contractors' Association Ltd.

3) Reg. 10(3)(p.12)

There is no guideline on numbers of persons in the rescue team and it can be one upto a large number.

The above are some of the observations of our members and please feel fit to use it with the relevant officials.

Yours sincerely,

C.K. Tsang
Past President

c.c. Mr. James Chiu
Mr. George Todkill
Mr. Paul Chong