

香港散貨集裝箱貨倉聯會的信頭  
Letterhead of HONG KONG CONTAINER FREIGHT STATION ASSOCIATION  
LTD.

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**TO: The Hon. Miriam Lau Kin-Yee, JP.,  
Legislative Councillor**

**FROM: Mr. Steve Lo  
President  
Hong Kong Container Freight Station Association**

**DATE: 26 July 1999**

Dear Miriam,

**Re: Factories and Industrial Undertakings  
(Loading Machinery) Regulation**

Thank you very much for your letter of 24<sup>th</sup> July 1999, with the attached copy of the above regulation.

As our association always want to upgrade the overall CFS industry's services standard, so do the operational safety, we are very supportive to idea of the forklift driver training courses offered by the two organizations, mentioned in the undertaking document. However, there is plenty of information that our association has been concerned very much and here we would like to discuss and share with you.

First of all, in the part of Economic Implications (13), the estimated number of forklift trucks is about 2,000 and the estimated number of forklift truck operators is about 2,000 in Hong Kong. However, we believe the actual number of forklift truck operators should be more than 2,000 now. It is because most of the CFS and Logistics companies in Hong Kong deploy **2 shifts per day** operation for forklift truck, rather than one shift per day. So, we believe that the estimated number of forklift truck operators is under-estimated. We estimate the number should be **about 4,500 forklift truck operators.**

Besides, we found that the fee of the training courses offered by the two organizations, VTC and OSHC are very **expensive**. This will exert pressure to our industry since the training fee will increase operating cost, especially if forklift truck operator resign or retire that one company need to pay for the training of a new operator, who may not have the training before. Also, just rely on the two organizations would make the training period and speed to be **long and slow**. We suspected that it needs at least 3.5 to 4 years to train up a majority number of the industrial forklift truck operators. In view of the industry, we believe that the training period and speed can be reasonably improved with the input from the industry.

Besides the content and coverage of the training course can be updated and added-in more practical experience if a well-experienced forklift truck operating industry is involved to establish the forklift truck operator's training course.

Therefore, we believe that a course offered by **an industrial third-party**, which has practical and industrial experience on using forklift truck for her daily operations should be considered. Our association is exactly such an industrial third-party such that we have our members all runs their daily operations with forklift trucks.

Due to our concern to this issue, we have already invited various related representatives from the Labour Department to join our association regular meeting on 12 July 1999 to show our great concern and interest on the same topic. We have declared that we are eager to train our forklift drivers with industrial tailored-made and practical training course at economical training fee. The Department has also agreed to our proposal and we will send them a proposal on the topic within a short period of time.

We wish that our participation and contribution in training up the forklift truck operators will not just able to improve the training efficiency. More importantly, we can pass our valuable industrial experience and to update the training course content from time to time through the input from the fast changing market demand and thus the changing requirement to daily forklift truck's operation. We totally believe that this will help to get high benefit from savings in fewer damages to machines and work stoppages as a result of accidents, as well as in medical expenses and compensation for workers. This eventually will benefit the whole society of Hong Kong.

We wish the above information would be useful in showing our great support and concern to the mentioned issue. Should you feel it necessary for us to make representations to the Subcommittee or for any further information, please feel free to contact us.

Best Regards,

Steve Lo