

Recommendation Letter

As our association, Hong Kong Container Freight Station (HKCFSA) always eager to improve the service quality of our industry, Container Freight Stations (CFS), and also highly concern about the occupational safety during daily operations, we appreciate the idea to organize the loadshifting machinery training courses to the local forklift trucks' drivers by VTC and OSHC very much. In addition, we are eager to show our help and contribution whenever it is needed. However, we found that some of the estimated figures in the document of Factories and Industrial Undertakings (Loadshifting Machinery) Regulation, Legislative Council Brief, Factories and Industrial Undertaking Ordinance are underestimated, which may lead to some misunderstandings to the practical situations of the industry. Therefore, we would like to discuss these points and offer practical suggestion in the following paragraphs.

First, in the 13th item of the proposal, it is estimated that there are just about 2,000 forklift trucks and therefore about 2,000 operational workers involving in various industrial undertakings nowadays in Hong Kong. Our association totally believes that the numbers are underestimated. The actual number of these two figures (the number of forklift trucks and forklift trucks' drivers) are far more than the estimated numbers in the proposal. For example, we estimate that there are **over 2,000 forklift trucks** are used by container freight station and logistics companies in Hong Kong. The operations of these companies rely heavily on forklift trucks in their daily operation. In addition, the estimated figure **excludes** those forklift trucks used by other non-member CFS companies in the industry, public warehouses, factories, supermarkets and so on. On the other hand, it is usually **“2 shifts per day”** instead of **“1 shift per day”** in most of the forklift trucks operation in our industry. Therefore, we have strong reason to believe that there are at least about 4,500 forklift trucks operators in Hong Kong, not just about the estimated 2,000 forklift trucks as the proposal mentioned. It means that, the number of forklift trucks' drivers in Hong Kong who

needed to be trained is at least about **4,500 people**, but not just 2,000 people.

Moreover, we found that the training fee of training course hold by VTC and OSHC is too expensive which will be a great financial load to these companies who rely heavily on forklift trucks in daily operation, especially to the CFS companies. Other than the additional heavy training fee, the waiting period of enrollment of the training course and the urged deadline of completion of the training process which require to complete in about 10 few months is **too slow and too urgent**. We believe that, it is impossible to finish before the approval of the regulation. We estimate that it would take about 3.5 to 4 years to train up most of the forklift trucks operators if we follow the training proposal that the government announced.

We totally believe that our government should provide **more resources** to help the two training organizations, VTC and OSHC to hold this meaningful and useful training course. At the same time, our government should **provide free training** to support the forklift trucks operators from our contributing CFS companies in our association, since we planned to offer active help in this issue. We have started to contact the two training organizations, VTC and OSHC to discuss the issues that we can cooperate in the plan. For example, we suggested the VTC and OSHC to provide qualified forklift trucks' trainers and course materials and our association provides training sites and forklift trucks for the training course. This practical suggestion, on one hand, can lower the cost of the training to the lowest extent, increase the efficiency and the students can be trained up and practice in a real working environment. On the other hand, after the completion of the training of our members, people from the industry and other areas can join this training too. It can help to create job opportunities in the current period, which unemployment rate is high; and also help to solve the problem of shortage of labor, especially forklift trucks' drivers in the industry. This practical suggestion indicates our association's effort in upgrading the quality of our service and the keen concern of occupational safety. In a word, we hope that this suggestion can be accepted since it can help to equip forklift trucks' drivers in our industry to get more safety knowledge and training so as to achieve the

standard of occupational safety for daily operation. This idea actually also demonstrates our association's continuing effort to contribute to our society.

Besides the forklift trucks' issues, we also strongly suggest to extend the scope of Green Card to our Container Freight Station industry too. This will not only improve the knowledge and service level of the many more people in our industry, but also help to prevent industrial accidents and loss. It is also another proof of our association's contribution in promoting the industrial safety in Hong Kong. We will put great effort in supporting this suggestion and provide proper help whenever it is needed.

We hope our suggestions can be discussed and accepted for the benefit of the good of the society and the industry. Thank you.