香港建造商會的信頭 Letterhead of The Hong Kong Construction Association Ltd

9 September, 1999

Mrs Constance Li Clerk to Subcommittee Legislative Council Legislative Council Building 8 Jackson Road Central Hong Kong

Dear Mrs Li,

Re: Proposed FIU (Loadshifting Machinery) Regulation

I refer to the proposed Regulation and submit comments of the HKCA for consideration by the subcommittee:

- 1. The HKCA supports the spirit of the proposed Regulation and is of the view that it will improve the safety standard of the construction industry.
- 2. The types of loadshifting machinery which will be included in Phase 1 implementation should be announced by the Commissioner of Labour before the Regulation comes into effect. The list of machinery identified for Phase 1 implementation in Paragraph 5 of the Legislative Council Brief is considered suitable.
- 3. Some machinery identified in the Brief for Phase 2 implementation are very special and not commonly used. They include locomotives and scrapers. CITA may not be the suitable training organisation of operators of these machinery. The Regulation should allow the owners or suppliers of these machinery to provide the training under the guidance of CITA.

Yours sincerely,

Patrick W T Chan Secretary General

c.c. The Hon. Ronald Arculli