

Construction Workers Registration Bill
Responses to the views and suggestions raised by the deputations on the Bill

Deputations	Views/Suggestions	ETWB's Responses
Major employers, training institute and related organizations		
<ul style="list-style-type: none"> - Airport Authority Hong Kong (LC Paper no.CB(1)2027/02-03(02)) - Hong Kong Housing Authority (LC Paper no.CB(1)1996/02-03(01)) - Hong Kong Housing Society (LC Paper no.CB(1)1996/02-03(02)) 	<ul style="list-style-type: none"> - Support the implementation of the Construction Workers Registration 	Noted.
Construction Industry Training Authority (LC Paper no. CB(1)2027/02-03(03))	<ul style="list-style-type: none"> a. Give updated information on the provisions of trade tests for construction workers. b. Strongly supports the implementation of construction workers registration scheme c. Agree to carry out the respective registration work for construction workers. d. Will work closely with the E&M industry to implement a more comprehensive trade test scheme so that construction workers of these trades can also obtain recognized qualification for registration. 	Noted.
CLP Power Hong Kong Ltd. (a collective submission from the Joint Utilities Policy Group) (LC Paper no. CB(1)1996/02-03(03))	<ul style="list-style-type: none"> - Support a mandatory registration system for construction workers, along with other views and comments given in their letter of 17.6.2003. 	<ul style="list-style-type: none"> - Please see LC paper no. CB(1)2038/02-03(14) dated 23.6.2003 regarding our responses to the comments raised by CLP Power.
Kowloon-Canton Railway	a. Support the Construction Workers Registration Bill.	a. Noted.

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<p>Corporation (KCRC) (LC Paper no. CB(1)2058/02-03(04))</p>	<p>b. As most of our existing overhead linesmen are not holders of the apprenticeship certificate but have more than 10 years practical experience, we suggest that our existing overhead linesmen be exempted from the qualification requirement of holding the apprenticeship certificate.</p> <p>c. We suggest that the certificates issued by KCRC for overhead linesmen after the 1st bulk registration be recognized for the purpose of registration under the Bill.</p>	<p>b. If the workers have 10 years or more relevant experience in the trade, they are eligible to seek exemption from trade test for registration as registered skilled worker (transitional) according to clause 39 of the Bill.</p> <p>c. There are currently no trade tests offered by CITA or VTC for the "Overhead Linesman" trade. However, provisions are provided under clauses 37(2)(b) of the Bill for the Registrar to accept, in consultation with the Qualifications Committee, qualifications which are considered equivalent. As it would take some time for the preparation work before commencement of the registration, KCRC may pursue recognition of their training and assessment provisions for such workers with the Registrar during such period.</p>
<p>Provisional Construction Industry Co-ordination Board (LC Paper no. CB(1)1996/02-03(04))</p>	<p>a. The proposed construction workers registration system features prominently amongst the 109 CIRC recommendations.</p> <p>b. Regarding workers with 10 years or more relevant experience could seek exemption from trade tests for registration as skilled workers subject to passing an assessment interview, the Board did not find it too onerous a requirement.</p> <p>c. The new legislation could be enacted as early as possible.</p>	<p>Noted.</p>
Professional Bodies		
<p>Hong Kong Institute of Architects</p>	<p>a. Support the Bill for registration of workers in the</p>	<p>Noted</p>

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(LC Paper no. CB(1)2038/02-03(13))	<p>construction industry.</p> <p>b. A registration system is a means to improve skill development for construction workers.</p> <p>c. Improvement of workers standard will improve income, standard of living and working environment.</p> <p>d. No construction workers will lose livelihood under the scheme of formal and provisional registration.</p> <p>e. Allow senior workers to be recognized.</p>	
<p>Hong Kong Institution of Engineers</p> <p>(LC Paper no. CB(1)2038/02-03(12))</p>	<p>a. Strongly support that there is a genuine need for the Government to implement a mandatory registration system for construction workers by legislation.</p> <p>b. There is an immediate need to put forth a full review of the details of the current register of construction workers. For example, the role of Registered Plumber is misleading that it should in fact be meant for water piping works but not for building drainage works.</p>	<p>a. Noted.</p> <p>b. Noted. The suggestion about reviewing the licensed plumber trade has been referred to Water Supplies Department for consideration.</p>
<p>Hong Kong Institute of Surveyors</p> <p>(LC Paper no. CB(1)2027/02-03(01))</p>	<p>- Raised 5 comments in their letter of 17.6.2003.</p>	<p>- Please see LC paper no. CB(1)2038/02-03(15) dated 23.6.2003 regarding our responses to the comments of HKIS</p>
Trade Associations		
<p>Hong Kong Construction Association Ltd.</p> <p>(LC Paper no. CB(1)2027/02-03(04))</p>	<p>a. The scheme will bring quality improvement to construction benefiting the society at large.</p> <p>b. 5 observations for supporting the proposed exemption criteria.</p> <p>c. Request the Bills Committee to support the</p>	<p>Noted.</p>

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	exemption criteria and requirements for the “senior workers” proposed by the Administration.	
Real Estate Developers Association of Hong Kong (LC Paper no. CB(1)2058/02-03(02))	<ul style="list-style-type: none"> a. The setting up of a registration scheme for construction workers has always been one of the top priority of the construction industry. b. Support that senior workers with over 10-year experience will not be required to sit for the trade tests. For those workers who have accumulated over 6 years of experience, a 3-year grace period will be provided for whilst temporarily registered. c. It is neither fair, nor beneficial to the overall interests of the construction workers and the construction industry if the exemption criteria are relaxed. 	Noted.
The Federation of Hong Kong Electrical & Mechanical Industries Trade Unions (LC Paper no. CB(1)2038/02-03(03))	<ul style="list-style-type: none"> a. Support the proposed scheme of Registration. b. Support that a worker with 6 years working experience could be temporarily registered as registered skilled worker, those with 10 years experience could be exempted from the trade test. c. Believe that the 6 years/10 years proposal would help to control service and produce quality building works. 	Noted.
Trade Unions		
Construction Site Workers General Union (LC Paper no. CB(1)2058/02-03(01))	a. It is estimated that 50,000 workers are required to be trade tested in the 3-year grace period, which may not be sufficient to test all the workers.	a. Excluding the senior workers who would be granted exemption from trade tests under the proposal, those who have passed trade tests and the general workers, it is estimated that about 35,000 workers are required to take

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	<p>b. Workers with 5-year experience should be eligible for exemption from trade test.</p> <p>c. The Bill does not give details on the certification of workers' experience and standard for the assessment interview. More details are needed.</p> <p>d. Composition of the assessment interview panel should be transparent and with wide representations from the industry, in order to achieve objectivity and gain public acceptance.</p> <p>e. If workers do not have 10-year experience or possess a trade test certificate, they could not obtain registration as a skilled worker, and hence subject to exploitation by the employers or contractors.</p> <p>f. Only 2 representatives from the trade unions are included in the Construction Workers Registration Authority and its committees, the number of representatives from trade unions should be increased</p>	<p>trade tests within 3 years. The training institutes advised that they had the necessary resources to cope with the demand in trade tests.</p> <p>b. Please see our responses to HKCIEGU's similar comment (item b) below.</p> <p>c. The experience claimed by the workers can be certified either by the <u>employers</u> concerned or the relevant <u>trade unions</u> or <u>trade associations</u>. We have considered other means to facilitate workers in obtaining verification of their past experience. Under clauses 63(1)(a) and (2), an application for registration will have to be in a form to be specified by the Authority and that form may include a statutory declaration to be made by the applicant on a certain part of his experience.</p> <p>d. Each assessment interview would be conducted by an assessment panel comprising representatives from trade union, trade association, training institute, sub-contractor or government department of the relevant discipline. Applicants would be expected to answer questions on skills, procedures and knowledge pertinent to the day-to-day work of his trade.</p> <p>e. There are provisions under clauses 37(4) and (7) of the Bill for workers to register as registered skilled worker (provisional) or registered semi-skilled worker (provisional) if they possess not less than 6 years or 2 years relevant experience respectively.</p> <p>f. The proposed membership composition of the Authority was formulated to have a balance mix of representations from different sectors of the construction industry. Given the comments made by the Union, we would give further consideration to the need for additional membership</p>

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	<p>to improve transparency.</p> <p>g. Details of the proposed Registration System do not meet the expectations of the workers and its implementation is too fast.</p> <p>h. The PCICB is responsible for the formulation and implementation of the proposed Registration System. They kept the proposal in the dark without wide consultation.</p>	<p>from the relevant trade unions.</p> <p>g. The notion of implementing a Registration System was raised and widely accepted by the industry in 1999, and a working group comprising key players of the industry was formed under the then Construction Advisory Board to study the proposal since then. Throughout this period, there have been extensive consultations with stakeholders of the industry on the proposal before the Registration System is finalized.</p> <p>h. The then Works Bureau led a working group to study and formulate the proposal for the implementation of the proposed Registration System. The working group comprised stakeholders of the construction industry, who were widely consulted throughout the course of the study.</p>
<p>Hong Kong Construction Industry Employees General Union (HKCIEGU)</p> <p>(LC Paper no. CB(1)2038/02-03(11))</p>	<p>a. Support the construction workers registration in principle.</p> <p>b. Workers who work as an apprentice for 3 years and have 2-year practical experience should be considered a skilled worker. Hence, workers with 5-year experience should be exempted from trade test.</p>	<p>a. Noted.</p> <p>b. Workers who have acquired 5-year relevant experience, but do not have any recognized qualification, are required to pass a trade test before they are qualified for registration as registered skilled workers. The Working Group on Registration of Construction Worker has thoroughly considered the experience requirement of senior workers necessary for granting exemption from trade tests. The original proposal put forth by the trade associations was 15 years, but as a compromise with the unions, a relevant experience of 10 years was accepted as a minimum period to ensure safety of the workers themselves and the public, and the quality of works. A shorter period of experience was considered not acceptable by a great majority Working Group members for the following reasons:</p>

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		<p>(i) Since these workers are allowed to obtain registration as skilled workers by simply passing an assessment interview, members considered that a longer period of experience was important to give a reasonable degree of assurance of their skill levels and craftsmanship.</p> <p>(ii) Based on the latest statistics of CITA and VTC, there are about 68,000 construction workers who have passed trade tests. It is estimated that there are only 35,000 skilled or semi-skilled workers who do not hold a trade test certificate or other qualifications for obtaining registration. This figure is significantly lower than the number of qualified workers. It is not justifiable to relax the experience requirement to accommodate the interest of this smaller group of workers and put the quality and safety of works at risk. Moreover, those workers who have passed trade/certification tests, and are in the majority, will not agree to relaxing the requirement.</p> <p>(iii) It will be unfair to the workers who obtained their trade test certificate/registration/license through continuous hard work and have exerted great effort in upgrading their skill levels and knowledge. This is also not in line with the industry and the Administration's long-term drive for quality and quality culture.</p> <p>(iv) If workers with only 5 years experience could be exempted from trade test and obtain registration, the creditability of the registration system would be in doubt and the employers may not have confidence in employing the exempted workers despite they are registered. The relevant trade associations have indicated that they would not employ the exempted workers if the experience requirement was relaxed.</p>

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	<p>c. To avoid causing adverse impact on the livelihood of existing workers and affect the stability of the society, the proposed Registration should adopt a progressive approach in its implementation, the requirement for registration should be lenient at the beginning and be tightened up afterwards.</p> <p>d. Workers should be widely and sufficiently consulted.</p> <p>e. Should alleviate the burden of workers in paying the registration fee.</p>	<p>(v) Construction workers who are currently not qualified as senior workers may apply to take trade tests directly if they already possess the requisite skill level for a skilled worker of the trade. If they have not yet reached the skill level for taking the trade test at the start of registration, they could obtain registration as a registered skilled worker (provisional) and prepare themselves to pass the trade test within 3 years.</p> <p>c. The Bill was formulated to minimize the impact on existing workers. There are one-off provisions for the senior workers to seek exemption from trade test and obtain registration by passing an assessment interview, and for other experienced workers to obtain registration provisionally in order that they could continue to work on construction sites. Registered skilled/semi-skilled workers (provisional) will be given a period of 3 years to pass the respective trade test.</p> <p>d. The two major trade unions HKCIEGU and HKKEEATWU are members of the Working Group and Sub-group on Registration of Construction Workers, they were repeatedly requested and reminded to consult their members widely throughout the study and the formulation process of the proposal.</p> <p>e. In order to alleviate the burden of construction workers in paying various fees pertinent to working on construction site, the Bill includes provisions to impose a levy on the construction works undertaken in Hong Kong to fund the proposed Registration System. That will help keep the registration/renewal fees at a level which the workers can afford. The proposed registration/renewal fee is \$100 for 3 years, which</p>

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	<p>f. Procedures for registration should be simplified.</p> <p>g. The registration should take care of workers specialized in a single trade or certain part/process of a trade. Assessment interview should be based on the type of construction work carried out by the workers.</p> <p>h. Many workers have no idea about the proposed Registration, the Government should broadly consult construction workers through different channels.</p>	<p>is reduced to \$50 for 3 years if the worker possesses recognized registration/ license/certificate.</p> <p>f. It is the Administration's intention to keep the registration procedures as simple as possible. To facilitate workers in renewing their registration and "green card", provisions have been included in the Bill to allow for future alignment of the renewal date of the proposed Registration with that of "green card".</p> <p>g. While workers are encouraged to develop multi-skills, we have managed to cover in the Bill all the principal trades in the construction industry including some specialized trades. For workers specialize only in certain parts or processes of a particular trade and have the requisite experience, they may apply for provisional registration initially and prepare themselves, by acquiring the necessary skill and knowledge, for taking the trade test. Assessment interview conducted for registered skilled worker (transitional) would essentially be based on the skill, knowledge and procedures of the work relevant to that trade.</p> <p>h. The workers unions, particularly those which are members of the relevant working groups, have been requested to keep their member workers informed of the latest development of the proposed Registration. Subject to passage of the Bill, there will be a publicity programme to publicize details of the proposed Registration.</p>

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<p>Hong Kong and Kowloon Cement and Concrete Construction Trade Workers Union (LC Paper no. CB(1)2038/02-03(07))</p>	<p>a. Similar to items a,b,c,h of HKCIEGU's submission.</p> <p>b. The short development course required for renewal of registration should merge with the refresher course for "green card" for simplification.</p> <p>c. The work carried out by electrical workers is of higher risk to the work force and the public, however, electrical workers with 6-year experience were granted exemption for registration.</p>	<p>a. Please see our responses to HKCIEGU's relevant comments.</p> <p>b. It is proposed that the short development course required for renewal of registration will include a half-day session on the "green card" refresher course.</p> <p>c. In formulating the exemption provisions, due consideration has been given to the qualification, experience, skill level and number of workers in the construction industry, the need to ensure works quality and site safety as well as the expectation of all stakeholders and employers, etc. One major difference between the proposed Registration System for construction workers and the registration of electrical workers is that a large number (about 68,000) of the construction workers have already passed trade tests and are qualified for obtaining registration before its commencement. The adoption of a lower experience requirement for exemption to avoid not having sufficient number of registered person to meet the demand is not necessary in this case.</p>
<p>Hong Kong & Kowloon Brick-laying & Construction Trade Workers' Union (LC Paper no. CB(1)2038/02-03(08))</p>	<p>- Similar to items a,b,c,g,h of HKCIEGU's submission.</p>	<p>- Please see our responses to HKCIEGU's relevant comments.</p>
<p>Hong Kong & Kowloon Carpenters General Union (LC Paper no. CB(1)2038/02-03(09))</p>	<p>- Similar to items a,b,c,g,h of HKCIEGU's submission.</p>	<p>- Please see our responses to HKCIEGU's relevant comments.</p>
<p>Hong Kong & Kowloon Dockyards & Wharves Carpenters</p>	<p>- Similar to items a,b,c,g of HKCIEGU's submission.</p>	<p>- Please see our responses to HKCIEGU's relevant comments.</p>

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General Union (LC Paper no. CB(1)2038/02-03(06))		
Hong Kong & Kowloon Painters General Union (LC Paper no. CB(1)2087/02-03(01))	a. Similar to items a,b,c,d,e,f,g of HKCIEGU's submission. b. Experience requirement for instructors of Training Institutes is only 3 years.	a. Please see our responses to HKCIEGU's relevant comments. b. Apart from completion of 3-year apprenticeship training and 4-year relevant experience, we understand that the instructors are expected to hold relevant trade test certificate and need to undergo practical tests.
Hong Kong and Kowloon Bamboo Scaffolding Workers Union (Tung-King) (LC Paper no. CB(1)2087/02-03(02))	- Similar to items a, b,c of HKCIEGU's submission.	- Please see our responses to HKCIEGU's relevant comments.
Hong Kong Construction Industry Bar-bending Workers Union (LC Paper no. CB(1)2155/02-03(01))	- Similar to items a, b of HKCIEGU's submission.	- Please see our responses to HKCIEGU's relevant comments.
Hong Kong Construction Industry Formwork Workers Union (LC Paper no. CB(1)2038/02-03(05))	- Similar to items a, b, c of HKCIEGU's submission.	- Please see our responses to HKCIEGU's relevant comments.
Hong Kong & Kowloon Masonry & Building Workers Union (LC Paper no. CB(1)2087/02-03(03))	a. Similar to items a,b,c,e,f,g of HKCIEGU's submission. b. Workers are required to attend short development courses for renewal of their registrations. There should be no assessment after attending the courses.	a. Please see our responses to HKCIEGU's relevant comments. b. Noted.
Hong Kong Construction Industry Surveying, Levelling and Project Supervision Staff Association	- Similar to items a,b,c,d,e,f,g of HKCIEGU's submission.	- Please see our responses to HKCIEGU's relevant comments.

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(LC Paper no. CB(1)2087/02-03(04))		
<p>Hong Kong Plumbing General Union</p> <p>(LC Paper no. CB(1)2038/02-03(10))</p>	<p>- Similar to items a,b,c of HKCIEGU's submission.</p>	<p>- Please see our responses to HKCIEGU's relevant comments.</p>
<p>Neighbourhood and Worker's Service Centre</p> <p>(LC Paper no. CB(1)2038/02-03(04))</p>	<p>a. Support the introduction of a construction workers registration system.</p> <p>b. Unemployment rate in the construction industry is high, workers with lesser experience may have poorer job opportunities after implementation of the registration. Their wages may be subject to exploitation by the employers.</p> <p>c. The proposed Registration System should be designed to provide proper attendance records for the workers, to protect the interests of workers and to help reduce wage disputes.</p>	<p>a. Noted</p> <p>b. Job opportunities of the workers would not be affected by the implementation of the Registration, but rather by the supply and demand of the market. Some existing workers may not have the requisite qualifications or experience to register as skilled or semi-skilled workers when the Registration comes into operation, hence there would be one-off transitional and provisional arrangements for the workers to seek registration and continue working on site. Provisionally registered workers would have 3 years to upgrade and prepare themselves for passing the respective trade tests.</p> <p>c. Each registered worker will be issued with a smart registration card which should be checked by a card reader when they enter or leave a site. Hence, this would provide more reliable site attendance records of each worker.</p>
<p>The Federation of Hong Kong Electrical & Mechanical Industries Trade Unions</p> <p>(LC Paper no. CB(1)2058/02-03(03))</p>	<p>a. To ensure quality of construction works, a comprehensive review of the relevant operations including policies on procurement, subcontracting and site supervisory and management etc. is necessary.</p>	<p>a. The Government is actively taking forward or facilitating the relevant industrial sectors in taking forward the 109 recommendations given in the CIRC report with a view to improving quality of construction works. Some of the improvement measures are already in place or in the pipeline.</p>

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	<p>b. Senior workers with 6-year experience or above should be exempted from trade test and be registered directly. The proposed qualifications for registration are summarized in a table.</p> <p>c. To prevent construction workers and employers from contravening the provisions in the Bill due to lack of knowledge, the scope of the registration and the definition of “construction site” should be clearly defined. Publicity of the registration should be strengthened to avoid causing confusion.</p> <p>d. Construction personnel are required to obtain various qualifications and pay various fees for performing the work under specialized trades. To alleviate their burden, the Government should introduce an electronic licensing scheme to streamline and centralize the issuance and renewal of various licenses.</p> <p>e. The training and trade testing provisions for some of the E&M trades covered in the Bill are currently incomplete. We doubt whether the provisions could be provided in time to cope with the need.</p> <p>f. Construction workers are currently suffering from</p>	<p>b. Please see our response to item b of HKCIEGU’s submission.</p> <p>c. The scope of the registration and the definition of “construction site” are clearly set out in the Bill. Upon passage of the Bill, there will be a publicity programme to publicize the proposed Registration.</p> <p>d. Noted. Construction workers are required to hold relevant qualifications when carrying out the work stipulated under existing ordinances for the sake of personal and public safety and to ensure the standard of work. Though centralizing the issuance and renewal of these certificates/licenses would help alleviate the burden of the workers, this requires careful study as it involves making amendments to each of the various ordinances concerned.</p> <p>e. The Administration is pursuing an amendment Bill to the Industrial Training (Construction Industry) Ordinance in order to provide funding for the requisite training and trade testing for E&M workers and CITA has been entrusted to administer such training and trade testing provisions. Pending passage of the amendment Bill, it is expected that the expanded provisions could be provided in time to meet the implementation of the proposed Registration System.</p> <p>f. Please see our response to item e of HKCIEGU’s submission.</p>

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	<p>unemployment or under-employment, implementation of the proposed registration will put another burden on the workers. We hope the Administration could keep the registration fee to a minimum to alleviate the burden of the workers.</p>	
<p>Hong Kong General Union of Lift and Escalator Employees (LC Paper no. CB(1)2087/02-03(05))</p>	<p>a. We did not participate in any of the meetings about the proposed Registration and have no in-depth understanding of the Bill.</p> <p>b. If the existing competent lift workers intend to work on construction sites, they are also required to registered under the proposed Registration and pay the registration fee. Hence, this will put another burden on them.</p> <p>c. Lift workers working on construction sites mainly carry out installation, wiring and adjustment work, but rarely on maintenance work.</p> <p>d. Under the existing ordinance Cap.327, lift apprentices should receive not less than 4 years training before they are qualified for competent lift workers. It is uncertain whether the semi-skilled</p>	<p>a. In view of the wide variety of trades in the construction industry, you may appreciate that the Administration has practical difficulties to include all the relevant trade unions to join the discussions of the Working Group. As such, only two major trade unions, which represent the interest of the majority of trades, were members of the Working Group.</p> <p>b. In order to meet the objectives of the proposed Registration and to capture data on lift workers working on construction sites, such lift workers are required to be registered. To alleviate the burden of workers in paying various fees pertinent to working on construction site, workers who possesses recognized registration/license/certificate are required to pay a reduced registration/renewal fee at only \$50 for 3 years.</p> <p>c. Noted.</p> <p>d. Competent lift workers or competent escalator workers are eligible for registration as registered skilled workers for the respective trade under the Bill. The Bill does not have registration provision for semi-skilled lift/escalator workers as there are no such workers under the existing</p>

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	<p>workers and temporary workers performing lift related works have received adequate training and whether the workers employed by subcontractors are qualified workers.</p> <p>e. Suggest that only competent lift workers performing equipment installation, wiring and adjustment work on site should be registered under the proposed Registration, but do not agree that all lift workers should be registered.</p> <p>f. The Hong Kong General Union of Lift and Escalator Employees should have representative in the Qualifications Committee and the Review Committee to look after the interest of lift workers.</p>	<p>Lift and Escalator Ordinance (Cap.327). Other workers performing lift related work should be registered as registered general workers and work under the supervision of registered skilled workers of the trade.</p> <p>e. The Bill requires only those workers personally carrying out construction work on “construction site” to obtain registration. Hence, lift and escalator workers who do not work on “construction site” are outside the scope of the proposed Registration.</p> <p>f. It is not practicable to include in the Committees a representative from each trade union in the construction industry. The Qualifications Committee and the Review Committee already have representatives from the relevant trade unions to look after the interest of construction workers including the E&M trades.</p>
<p>Welding Industry Employees Association (LC Paper no. CB(1)2038/02-03(02))</p>	<p>- Similar to items a and b of HKCIEGU's submission and item c of Hong Kong and Kowloon Cement and Concrete Construction Trade Workers Union's submission.</p>	<p>- Please see our responses to HKCIEGU's and Hong Kong and Kowloon Cement and Concrete Construction Trade Workers Union's relevant comments.</p>