



香港工程師學會

THE HONG KONG INSTITUTION OF ENGINEERS

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Panel on Public Service and
Panel on Planning, Lands and Works
Legislative Council Secretariat
3rd Floor Citibank Tower
3 Garden Road Central
Hong Kong

Dear Sirs

**LegCo Panel on Public Service and Panel on Planning, Lands and Works –
Joint Meeting on 17 July 2006
“Private Certification of Building Submissions”**

We refer to the captioned meeting regarding the consultancy study on Private Certification (PC) of Building Submissions and would like to put forth the HKIE's stance on the subject matters.

According to the information provided, the HKIE in principle objects to the private certification and thus does not support the development of implementation strategy for PC in the consultancy study. Enclosed please find our views and comments on PC of Building Submissions for your information and consideration.

Yours sincerely

Monica YUEN (Mrs)
Secretary

Encl

LegCo Panel on Public Service and Panel on Planning, Lands and Works

Views of the Hong Kong Institution of Engineers on Private Certification of Building Submission

The HKIE in principle objects to the Private Certification (PC) of Building Submission on the following grounds: -

- The present building control system on structural and geotechnical submissions executed by the Buildings Department (BD) does not create major barricades to private developments and hinder building design innovations. However, there are rooms for enhancing the efficiency and effectiveness of the present control regime.
- Total independence and impartiality can be guaranteed when plan checking is carried out by the Government.
- As a central plan processing body, the BD has substantial historical and contemporary data such that they can assess a development with a holistic view on the effects of proposed construction activities on the local as well as Regional areas concerned. In fact, with the transparent information flow amongst relevant government departments, the accumulative and inter-dependent effects of adjoining construction, both private and public, on a region can be assessed by the present centralised plan processing system. Apparently, this crucial function cannot be achieved by private certification system.
- With the introduction of new Codes of Practice and Practice Notes, the BD accepts performance-based design approach to promote innovative and economical design of building structures. To ensure minimum standard of safety is adhered to in all private building developments, the present centralized plan processing body should remain. Discretionary power on the interpretation of compliance to performance criteria should not be vested with individual private checkers with a view to maintaining a consistent compliance standard.

The HKIE is also of the view that PC is not the only viable way to speed up construction cycle and reduce development cost. We suggest that other options should be considered by the Task Force of the Provisional Construction Industry Coordination Board (PCICB). In this respect, we recommend that the Consultancy Study should be steered to investigate ways to improve the efficiency of the existing building submission system.

We are of the view that the present statutory approval period of building submission (i.e. 2 months max.) stipulated by the Building Ordinance is reasonable and acceptable. To achieve greater flexibility during construction stage, we suggest that the Consultancy Study should review the current consent application procedures with the view of further improving the existing control system and expediting the site progress by streamlining the consent issuance process. It should also look at the co-ordination both within the BD and relevant government departments so as to achieve

better efficiency in the processing of plan submission and certainty in the statutory periods.

With the assumptions that PC is the only cure of streamlining the approval process, the above issues cannot be truly reflected by an implementation of trial scheme. We also doubt whether the trial scheme can be carried out under an equally controlled condition for the BD and the trial certifier – without which results are meaningless.

In this connection, the HKIE does not support the development of implementation strategy for PC in the Consultancy Study.