



Date: 7<sup>th</sup> July, 2011

Ms Iris Cheung  
Clerk to Bills Committee  
Legislative Council Secretariat  
3/F Citibank Tower  
3 Garden Road  
Central  
Hong Kong

Dear Ms Cheung,

**Re: HKAPMC's Views on Lifts and Escalators Bill**

We refer to your letter of 24<sup>th</sup> June, 2011 (your ref: CB1/BC/7/10) inviting The Hong Kong Association of Property Management Companies (HKAPMC) to forward our views on the captioned Bill. Being the "Responsible Person" specified by the Bill, we have consolidated the written views from our members which have been attached for the Bill Committee's consideration.

Currently, HKAPMC has 86 members comprising over 300 professional property management companies at all sizes, which manage over 60 per cent of the private residential properties, different kinds of commercial premises, shopping centres, car parks as well as various private and public facilities in Hong Kong.

Thank you for your kind attention. Should you require further information, please contact our Administration Officer, Ms Micheline Lo at 2186-6101.

Yours sincerely,  
For and on half of  
The Hong Kong Association of Property  
Management Companies

Dr. Edmond Cheng  
President

Encl.

c.c. Ir Dr Hon Raymond Ho Chung-tai, SBS, S.B.St.J., JP – Chairman of Bills Committee  
Mr Alfred Sit Wing-hang – Assistant Director/Gas and General Legislation of EMSD

**The Hong Kong Association of Property Management Companies**

**香港物業管理公司協會**

2709-11, 27/F Shui On Centre, 6-8 Harbour Road, Wanchai, Hong Kong

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## HKAPMC's Views on Lifts and Escalators Bill

|   |   | Comment   |
|---|---|---|
| A | <p>Part 2 – Division 2 – Subdivision 1<br/>Clause 12<br/>Part 3 – Division 2 – subdivision 1 clause 44</p> <p>Duties of responsible persons to ensure that Lifts and Escalators are in proper state of repair and in safe working order</p>                                 | <p>Property Management companies are agents for Property Owners / Incorporated Owners. We wish to bring to your attention our past experience of having problem in getting fund approval for works in keeping the lifts/escalators in proper state of repair and in safe working order. We would like to see some additional provision in this clause or some specification in the codes of practice to address this problem so that management companies can discharge their duties fully.</p> |
| B | <p>Part 2 – Division 2 – Subdivision 1<br/>Clause 15<br/>Part 3 – Division 2 – subdivision 1 clause 47</p> <p>Duties of responsible persons to ensure that registered Lift / Escalator contractors undertake maintenance works and certain other Lift / Escalator works</p> | <p>We would like to bring to your attention the technical problem of supervising the work of registered Lift/Escalator contractors by the responsible persons, and wish that limited duties shall be specified in the codes of practice so that our members can discharge of their limited duties reasonably.</p>   |

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|   |   | Comment   |
|---|---|---|
| C | <p>Part 2 –Division 4</p> <p>Clause 36 (2)</p> <p>Improvement orders</p>                | <p>Time limit specified in the order for repair / improvement should be reasonable with due respect of the Code of Practice - Building Management Ordinance Cap 344 whereby work with value &gt;\$200,000 shall be put up for tender, and work with value &gt;20% of annual budget shall be resolved in owners meeting, while 14 days advance notice is also required for holding an owners' meeting.</p> |
| D | <p>Part 2 – Division 5</p> <p>Clause 40</p> <p>Incidents to be reported to Director</p> | <p>The requirement of reporting by the responsible person within 24 hours after an incident should be relaxed. We suggest that the incidents may be reported either by the responsible person or Lift / Escalator contractors within 48 hours.</p>  |
| E | <p>Part 7-Division 4</p> <p>Clause 145</p> <p>Issue of codes of practice</p>            | <p>Apart from other parties if any, we suggest that EMSD should consult HKAPMC in producing the codes of practice.</p>  |

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