

**The Hong Kong Institute of Surveyors (HKIS) Building Surveying Division (BSD)
Comments on Proposed Registered Fire Engineer (RFE) Scheme by the Fire Services
Department - LC Paper No. CB(2)142/15-16(03)**

- (1) The HKIS BSD supports the devolving of fire safety risk assessment, compliance inspection and certification to the market, and suggests a comprehensive review to be carried out after a pilot scheme of 2 years.
- (2) Nevertheless, the HKIS BSD raises strong objection to the RFE registration qualification, which only accepts Registered Professional Engineer of relevant disciplines (such as the fire engineering, building services, electrical or mechanical engineering disciplines) under the Engineers Registration Ordinance (Cap. 409), or has to possess the fire engineering qualification considered appropriate by Director of Fire Services (DFS), can be qualified as RFE.
- (3) Fire safety inspection (including compliance inspection) and certification, prescribed inspection in the elements of fire safety, fire safety management, implementation of fire safety improvement works, and provision of licensing consultancy for all kinds of licensed premises are the expertise of the Building Surveyor. Our qualified Building Surveyors in the capacity of Authorized Person (AP) or Registered Professional Surveyor (Building Surveying) RPS (BS) have been, and are currently, the services providers / practitioners in both the public and private sector. We all have in-depth training and vast practical experience in the local building industry and are well recognized by the public.
- (4) Based on the current building control mechanism under the Buildings Ordinance (BO), Building Services Engineer / Fire Engineer is not mandatory whilst AP undertakes a role to ensure building (including new development, Alteration & Addition (A&A) works, licensed premises) and associated works are rendered safe. AP shall endorse on statutory submission prepared by Registered Contractors e.g. Registered Lift and Escalator Contractor, Registered Fire Service Installation Contractor, etc. to ensure compliance.

- (5) We understood that some buildings / premises may not be able to meet the prescriptive fire safety requirements due to their unique design, site constraints, size, complexity, etc. and hence alternative solution for fire safety provision (i.e. fire engineering approach) may be adopted and such kind of study / assessment should be carried out by a qualified professional with relevant qualification of fire engineering.
- (6) Nevertheless, Building Surveyors are capable to provide professional services in compliance of prescriptive requirements of fire safety and handling all matters in relation to the building and fire safety of licensed premises. Examples include but not limited to:-
- a) Preparation and Submission of General Building Plans and Alteration & Addition (A&A) Works Plans, including fire services installation and equipment to Buildings Department and Fire Services Department for approval;
 - b) Maintenance of bounding conditions as defined by Clause G8.1 of Code of Practice for Fire Safety in Buildings 2011 (e.g. maintenance and management of fire safety management plans) or equivalent;
 - c) Engagement in the works relating to fire safety improvements under Fire Services Ordinance (Cap 95), Fire Safety (Commercial Premises) Ordinance (Cap 502) or Fire Safety (Buildings) Ordinance (Cap 572), or equivalent;
 - d) Submission of Certificate of Compliance C (Fire Safety Requirements) for application of provisional (restaurant/light refreshment restaurant) license; and
 - e) Submission of Form FSI/501 for Application of Inspection and Testing of Fire Services Installations and Equipment.
- (7) We strongly suggest the FSD to replace the title “Registered Fire Engineer” or “RFE” with another one which is more appropriate, such as “Registered Fire Safety Certifier” or “Registered Fire Safety Consultant” R(FS)C. This better describes the nature of works involved. If this title cannot be changed at this stage, namely the 2nd Reading, it should be changed later when the subsidiary legislation is drafted for circulation or consultation.

We also suggest the formation of the Registration Committee to assess the competence of applicants should be well represented by different stakeholders in the industry, which should include representatives of the Hong Kong Institute of Surveyors, Hong Kong Institution of Engineers, Hong Kong Institute of Architects, and other bodies as appropriate.

- (8) Based on the above-mentioned, we strongly request FSD to include AP and RPS(BS) who have sufficient academic knowledge and suitable practical experience into the proposed registration mechanism. The following amendments to the proposed registration mechanism are for FSD's consideration:-

<u>Categories</u>	<u>Qualification</u>	<u>Remarks</u>
RFE (RA) (sub-category: Performance Requirements) Or retitled as R(FS)C-RA(PerF)	RPE(Fire) with min. 3 years practical experience. AP with tertiary education (Bachelor degree or above) in relation to Fire engineering and min. 3 years practical experience.	Carried out by FSD during the 1st stage of pilot scheme (before completion of comprehensive review on the Pilot Scheme)
RFE [RA] (sub-category: Prescriptive Requirements) Or retitled as R(FS)C-RA(PreS)	RPE(Fire), RPS(BS), AP; with min. 3 years practical experience.	Carried out by FSD during the pilot scheme (before completion of comprehensive review on the Pilot Scheme)
RFE [FSI] (sub-category: Compliance Inspection and Certification of Licensed Premises) Or retitled as R(FS)C-FSI	RPE(Fire), RPS(BS), AP; with min. 3 years practical experience	
RFE [VentS] (sub-category: Compliance Inspection and Certification of Licensed Premises) Or retitled as R(FS)C-VentS	RPE(Fire), RPS(BS), AP; with min. 3 years practical experience	

Prepared by Building Surveying Division

The Hong Kong Institute of Surveyors

19 January 2016