



屋宇署本地屋宇測量師協會
BUILDINGS DEPARTMENT LOCAL BUILDING SURVEYORS' ASSOCIATION

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Legislative Council Secretariat
Legislative Council Complex
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(By Fax Only – 2869 6794) (Attn: Miss Lee)

30 March 2016

Dear Sir

Fire Services (Amendment) Bill 2015

I refer to the views from the following five parties:

- Letter dated 10.3.2016 from The Hong Kong Institution of Engineers (Fire Division) (HKIE)(FD)
- Letter dated 2.3.2016 from The Association of Registered Fire Service Installation Contractors of Hong Kong Limited (for FSICA)
- Letter dated 11.3.2016 from Passive Fire Protection Research Centre (PFPRC)
- Letter dated 10.3.2016 from The Institution of Fire Engineers (HK Branch) (IFE)
- Letter dated 11.3.2016 from the industry of fire engineering under HKIE (The FE industry)

2. BDLBSA respects their different views. With all due respect, they should be supportive to the original intent of the Bill.

3. We have STRONG objection to the view that "the only competent people should be qualified as Registered Fire Engineers (RFE)" (from HKIE (FD) and FSICA). Considering the scope of works (the works) as paragraphed in Bill documents proposed to be delegated, the works have been performing by FSD officers, by which not all officers are RFE. The fact is that non RFE are competent to perform the works. On the other hand, technical persons involved in the said license applications are from all different streams (i.e. Surveyors, Architects and Engineers) and majority of projects received by FSD are small scale and not complicated to the level which need RFE's expertise.

4. As regards the argument that RFE could clear the cases in the shortest time, the numbers of practicing RFE shall be revealed so that together with the numbers of cases received by FSD the argument might be justifiable. After all, the greater number of qualified professionals involved the shorter the time for clearing FSD backlog cases. Professionals from more streams should therefore be qualified for the works.

5. Passive means for firefighting is under the scope of control and enforcement of the Buildings Ordinance. If the LegCo would like to hear views from this aspect, building surveyors who have expert knowledge in the design and planning of Means of Escape, Fire Resisting Construction and Means of Access for Fire Rescue under Fire Safety Code, Buildings Ordinance and allied Regulations should be consulted.

6. It is noted that curriculum of Bachelor Degree for FE and Surveying have been compared by PFPRC. However the comparison should also include the same for Engineering and Architectural together with subjects in their Master Degrees, and on-job training requirements and/or man hours of the 4 streams, etc.

7. Furthermore, job duties of FE and Surveyor are listed in PFPRC's letter which subtly directed readers to compare the two. Comparison should also include the same for Engineering and Architectural disciplines together with the requirement of corporate membership and CPD of the 4 streams, etc.

8. Simple comparisons as stated in the above paragraphs can hardly conclude that RFE is the only competent profession for the works listed in Bill documents.

9. It is observed for the Committee's attention that there is conflict of interest for IFE (HK Branch) to raise views for the issue since their chairmen and core executives are top management personnel or directorate grade officers of the Fire Services Department, despite the one signing the cover letter is the only non FSD directorate. People from the FE industry are actually the same people from the HKIE (FD).

10. To confine the works to one profession only is obviously not beneficial to the construction industry and not justifiable in meeting the original intent of the Bill. BDLBSA strongly suggests to replace the title "RFE" with another one which is more appropriate / neutral, such as "Registered Fire Safety Certifier" or "Registered Fire Safety Consultant". This better describes the person who is competence and nature of works involved.

11. If you have any query, please contact the undersigned at 2626 1432.

Yours faithfully



cc · Hon Tony TSE (info@tonytsewaichuen.com)