



Legislative Council Secretariat

6 June 2016

To Legislative Council Panel on Security

11 Legislative Council Road

Central Hong Kong

By email : panel_dev@legco.gov.hk / Fax 2537 1851

Attn.: Ms. Janet Shum Senior Council Secretary(2)5

Dear Madam,

Proposed Registered Fire Engineer Scheme, CB(2)1542/15-16(02)

We refer to your email on 25.5.2016 providing the updated information on the proposed RFE Scheme (CB(2)1542/15-16(02) , we would like to submit our further comments on the proposal as below:-

1. The proposed 3 categories of applicants (Para. 3) have not truly reflected and included the current practitioners like qualified building surveyors available in the market. Building Surveyors provide professional consultancy service to our clients who wish to build and convert new or existing buildings for the use of licensed premises. The services in practice include feasibility, design, submission, supervision and inspection upon completion of both building and fire safety elements and installations according to the relevant ordinances, regulations and code of practices. Hence the inclusion of Building Surveyors as one of the eligible applicants for Registered Fire Engineer (RFE) with the same requirement as registered professional engineer shall be favorably considered by the FSD. Your exclusion of Building Surveyors in the proposed PFE would certainly affect the current market ecosystem and the existing building surveying practitioners would be eliminated by the new regulation. As a result, people who would like to engage suitable professional to facilitate their licence application would have to reduce their choices substantially and face a higher cost that would increase their financial burden. Therefore, it is recommended to include qualified building surveyor with one year relevant experienced as one of the candidates for application of RFE.

2. The registration requirements for Registered Professional Engineer (RPE) as RFE (Para. 3 (I)) appears that they are the only recognized professional who can perform the duty of RFE. However, their roles and function in the current licensing mechanism have not been demonstrated. Instead, the Authorized Person has taken a active and leading role under the current system. Therefore, Authorized Person (AP) shall be automatically qualified as RFE without any additional requirements.
3. The details e.g. duration and mode of study e.g. short course, diploma or degree of the proposed bridging course for relevant degree holders and experienced practitioners shall be clarified (Para.3 (ii) & (iii)). We consider that short course with not more than 20 hours should be appropriate. The availability of the bridging course would also affect the effective implementation of the regulation. Also degree in Building surveying or Degree in Surveying shall also be recognized as nowadays most of the universities in Hong Kong offer 'Surveying' degree only. Some of our members, who hold a general degree with related subjects, are now practitioners and should also be considered as equivalent qualifications.
4. The compositions of Registration Committee and Interview board including examination assessors are recommended to include representative from Qualified Building Surveying Profession as we are one of the key practitioners in the licence application. (Para. 17)
5. FSD is requested to provide the academic and professional background of FSD officers who are currently carrying out the application and approval as a benchmark to determine which professional or personnel is eligible for application for RFE (Para.19)
6. The roles and involvement of APs throughout the licence application and approval (Para.20 – 23 & 25) process have been fully reflected. Just like the qualified building surveyor, APs also involve in the very beginning of the licence application till the granting of licence by the FSD (refer to point 1 above). Hence the inclusion of AP onto the RFE register automatically is highly supported.

We support the Government to introduce the scheme and our institute is ready to discuss with you further on the scheme, we also hope that our views will be useful to the Legislative Council Panel on Security and FSD to further improve the Bill so that the interests of general public, business operators and practitioners can be safeguarded.

Yours faithfully,



Andrew Lee
Chairman of Hong Kong Board
Royal Institution of Chartered Surveyors

C.c. Hon Tony Tse , BBS, Legislative Councillor (info@tonytsewaichuen.com) / fax no. 2880 5128)

C.c., Mr S.H. Lo, Assistant Director, Fire Safety Command, Fire Service Department, 7th Floor, North Wing, Fire Services Headquarters Buildings, 1, Hong Chong Road, Tsim Sha Tsui East, Kowloon. (Fax no. 2312 0376)