



Legislative Council Secretariat
Legislative Council Complex
11 legislative Council Road, Central, Hong Kong
(By Fax Only – 2869 6794) (Attn: Miss Lee)

8 June 2016

Dear Sir

Fire Services (Amendment) Bill 2015

I refer to the LC Paper No. CB(2)1542/15-16(02) and my letter dated 6.6.2016.

2. Our additional comments are as follows:

- We do not agree that Authorised Persons (AP) are NOT involved in the process of handling application for a full licence of Restaurant Licences and Places of Public Entertainment Licences as stated in para. 22 of the captioned paper. We understand that FSD officers are only qualified to offer advice on Fire Services Installation but they are NOT qualified to give advice on the requirements of Fire Safety Code. In the construction industry, only APs, Architects and Building Surveyors (BSs) are experts in the interpretation and application of Fire Safety Code and Fire Risk Assessment. The proposal to exclude APs and BSs from the registration of RFE is totally unacceptable. The livelihood of the current practitioners in the field should NOT be adversely affected. Grandfather clause should be added to let the current practitioners (i.e. APs and BSs) be automatically qualified as RFE without any additional requirements.
- The compositions of Registration Committee and Interview board are recommended to include representative from APs and BSs as they are the key practitioners in the licence application.
- FSD should disclose the academic and professional background of FSD officers who are currently carrying out the approval as a benchmark to determine which professional or personnel is eligible for application for RFE.

- We have objection to the title “Registered Fire Engineer”. Neutral term such as ‘Certifier’ should be used. APs and Registered Inspectors who may be Architects, Engineers or Surveyors are adopted under the Buildings Ordinance.

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

Yours faithfully



Anderson C.B. CHAN
(Chairman of BDLBSA)

cc Hon Tony TSE (info@tonytsewaichuen.com)