THE HONG KONG INSTITUTE OF
SURVEYORS
香港測量師學會

Your Ref: CB2/BC/2/16

12 January 2017

By Fax (2185 7845) & Post

Clerk to Bills Committee
Legislative Council
Legislative Council Complex
1 Legislative Council Road
Central
Hong Kong

Attn: Ms Janet Shum

Dear Sirs

Bills Committee on Fire Services (Amendment) Bill 2016

On behalf of The Hong Kong Institute of Surveyors (HKIS), I have much pleasure in submitting our views on the Fire Services (Amendment) Bill 2016.

A. General

(1) The HKIS have more than 9,000 members specializing in various disciplines. Around 1,200 Corporate Members and 900 non-Corporate Members are practicing in the field of Building Surveying; and more than 200 Building Surveyors are registered as an Authorized Person (Surveyor). Building Surveyor is one of the professionals and major players to provide fire safety services to the society.

(2) The HKIS supports the devolving of fire safety risk assessment, compliance inspection and certification to the market in principle, provided that the Fire Services (Amendment) Bill 2016 is constructed in a logical way, in fairness to all stakeholders and better-off approach to the society at large. The HKIS suggests a comprehensive review to be carried out after a pilot scheme of 2 years.

(3) The HKIS supports to accept all personnel with the required qualification and experience in fire safety to be registered as RFE, and provide the specific services to the market.

(4) The Registration Committee for assessing the competence of applicants should be well represented by different stakeholders in the industry, which should include representatives from the Hong Kong Institute of Surveyors, Hong Kong Institution of Engineers, Hong Kong Institute of Architects, and other bodies as appropriate.

.../2

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(5) The HKIS are neutral to the title "Registered Fire Engineer" as it only reflects the position or job title of a wide spectrum of professionals who undertake fire safety related assignments.

(6) Positive vetting of the Fire Services (Amendment) Bill 2016 is supported.

B. LC Paper No. CB(2)1817/15-16 (Report of the Bills Committee on Fire Services (Amendment) Bill 2015)

Qualified Personnel to be registered as RFE

(1) For the proposed three types of persons mentioned in the Para. 25(a) to (c) of the LC Paper No. CB(2)1817/15-16, it is necessary to well define what types of working experience are qualified under each category of RFE, for instance, consultancy services for license application and smoke control design.

(2) For persons as mentioned in Para. 25(b), given the academic background or relevant top-up course requirements; it is suggested reducing the required number of years of relevant working experience from 6 years to 3 years in this pilot scheme.

(3) For persons as mentioned in Para. 25(c),

- minimum academic qualification similar to persons as mentioned in Para. 25(b) is suggested, which aims to maintain an adequate level of knowledge base.
- it is suggested reducing the required number of years of relevant working experience from 15 years to 12 years in this pilot scheme.
- experienced practitioners will normally provide strategic views and concepts on fire safety issues. Their competency should not be gauged on the same assessment criteria as for professionals at operational level. With a view to engaging these truly experienced practitioners, it is suggested to waive the top-up course requirements in this pilot scheme.

C. LC Paper No. CB(2)471/16-17(01) (Paper on introduction of the Registered Fire Engineer Scheme provided by Administration)

(1) In page 4 of the LC Paper No. CB(2)471/16-17(01), it states "To leverage **PROFESSIONAL ENGINEERS AND QUALIFIED PERSONS** in the market for the provision of fire safety risk assessment and certification services".

(2) In Para. 17 of the Legislative Council Brief SBCR 1/2361/14 dated 16 November 2016 (hereinafter referred the "Brief"), it states "Under the Proposed RFE Scheme, **QUALIFIED PERSONNEL** may register with FSD as RFEs, and members of the public may engage RFEs to provide fire safety certification services". It is more appropriate and neutral to explain its meaning than the description in (1) above.

.../3

(3) In order to rectify the discrepancies and not to confuse the LegCo members and the general public, the term **"PROFESSIONAL ENGINEERS AND QUALIFIED PERSONS"** in page 4 should be replaced with **"QUALIFIED PERSONNEL"**.

(4) It is not appropriate to highlight the term "Professional Engineers" in page 4 of the LC Paper No. CB (2)471/16-17(01) provided that the qualifications of RFEs have been mentioned in Para. 25 of the LC Paper No. CB (2)1817/15-16.

(5) Professional Engineer of relevant discipline is only one of the stakeholders in the industry who undertakes fire safety related assignments. We reiterate that Building Surveyor is competent and have vast experience to provide the required services and should be accepted in the registration mechanism.

D. Legislative Council Brief SBCR 1/2361/14 dated 16 November 2016 (hereinafter referred the "Brief") (as mentioned in Para. 7 of LC Paper No. CB(2)457/16-17(04))

(1) In Annex B, Para. 3, it stipulates "..... it is proposed to implement the Registered Fire Engineer (RFE) Scheme to leverage **PROFESSIONAL ENGINEERS** and **QUALIFIED PERSONS** in the market for the provision of fire safety risk assessment and certification services."

(2) In order not to confuse the LegCo members and the general public as mentioned in Section C above, the term **"PROFESSIONAL ENGINEERS AND QUALIFIED PERSONS"** in Annex B Para. 3 should be replaced with **"QUALIFIED PERSONNEL"**.

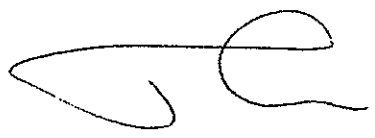
(3) In Annex B, Para. 4, Qualifications and Duties of RFEs, it states "Under the proposed RFE, a person applying to become an RFE has possesses relevant **FIRE ENGINEERING QUALIFICATION AND EXPERIENCE** as considered appropriate by DFS."

(4) In Annex B, Para. 4 (i) to (iii), it clearly describes the duties of RFE, i.e. conduct fire risk assessments, formulate fire safety requirements, conduct compliance inspections, and issue fire safety certificates upon confirmation of compliance. All of the duties are related to **FIRE SAFETY** instead of **FIRE ENGINEERING**.

(5) In order not to confuse the LegCo members and the general public, the term **"FIRE ENGINEERING QUALIFICATION AND EXPERIENCE"** in Annex B, Para. 4 should be replaced with **"QUALIFICATION AND EXPERIENCE IN FIRE SAFETY"**.

Thank you for your attention.

Yours faithfully



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