



Bills Committee

3.11.2019

Legislative Council Secretariat
Legislative Council Complex
1 Legislative Council Road
Central, Hong Kong

Re: Bills Committee on Fire Safety (Industrial Buildings) Bill

Dear LegCo Bills Committee,

By way of introduction, my name is Luigi La Tona, the Executive Director of the Self Storage Association Asia, the industry body for self storage (the industry) in Hong Kong and Asia. The purpose for writing is to share the industry's concerns regarding the Fire Safety (Industrial Buildings) Bill.

On the whole, we view this Bill positively which is reflected in our response to a previous Consultation Letter on the same a few months ago. We do however have a few concerns.

Our primary concern is that this fire bill must be uniform as it pertains to buildings and tenants. One of the biggest requests of the Fire Services Department (FSD) is a windows provision where changes are requested in the premises occupied solely by self storage on the basis of fire safety. Does this mean the rest of the building with regular building permissible windows is unsafe? I hope you can understand how this lack of conformity for the whole building can increase an already unsafe fire situation in many industrial buildings. We are simply seeking fairness.

Furthermore:

1) *Which department is taking the lead on this bill?* We understand many building fixes will have to go through the Building Department (BD) but this is an FSD bill. Will the industry need to clamber over different requirements and departments with different timelines much as the current situation with self storage?

This is an ongoing and pervasive problem since the fire happened and the industry has, since day 1, simply asked for a task force. As this has not been applied, the industry is confused, especially as much of the changes are unpractical over different departments, and thus, only 11% of the industry has moved to fulfil FSD demands.

2) *Are there assurances (will any department be held accountable) that any company fulfilling current requests will not be required to tear down new structures to apply the new fire bill rules?* As I'm sure you can understand, the industry needs guarantees as millions of dollars are currently being spent to fix to

FSD, Electrical and Mechanical Services Department (EMSD), and BD's provisions. The industry is only asking for reasonable and strategic solutions.

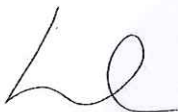
3) *Why wouldn't the addition of sprinklers change the demands from the fire department?* With the advice of professionals and fire engineers, this sincerely needs to be considered among LegCo members and we hope you can give it consideration. We have verifiable confirmation from a professional fire engineering firm, ARUP, that this can be the case. If sprinklers were in the building where the self storage fire occurred, the fire would not have spread and the situation would not have gotten to the level it did.

Sprinkler heads require 500mm distance between them and the structure below to be most effective. They are piped in at 250mm from the ceiling. As such, 250mm from the ceiling + 500mm from the sprinkler is 750mm. Countries around the world use this precedent and the FSD is requiring 1,000 mm distance from the industry.

Can 750 mm be considered? It is still a remarkable adjustment from the current provisions. The industry has already proven that a lesser distance than 1,000mm works through fire engineering studies with ARUP - even without sprinklers! The industry would highly value this consideration given this is the biggest impediment to the industry working toward solutions. In this, your committee and the industry have a sincerely great opportunity to work together on this issue and find faster solutions for the safety of the industry - only however if someone would open a reasonable discussion about it with the FSD and fire engineers.

I would be happy to take your suggestions about who we may further send this message to as we strongly believe these are reasonable questions and concerns. Please reach me anytime by phone 2919 0315, or by email, luigilatona@selfstorageasia.org, as the industry would be happy to meet and discuss further.

Best,



Luigi La Tona

Executive Director

Self Storage Association Asia