



3 September 2021

By Email ([bc\\_09\\_20@legco.gov.hk](mailto:bc_09_20@legco.gov.hk)) & Post

Clerk to Bills Committee on  
Landlord and Tenant (Consolidation) (Amendment) Bill 2021  
Legislative Council Complex  
1 Legislative Council Road  
Central  
Hong Kong

Attn: Mr Derek Lo

Dear Sirs,

### **Landlord and Tenant (Consolidation) (Amendment) Bill 2021 (the Bill)**

On behalf of The Hong Kong Institute of Surveyors (HKIS), I would like to submit our views and suggestions on the captioned Bill for the consideration of the Government.

#### **1 Tenancy Control Measures**

- 1.1 The HKIS in general welcomes the Government's proposal to introduce a bill to implement tenancy control on subdivided units (SDUs). We support the need for suitable measures to be implemented for safeguarding the interests of low-income individuals and families from unscrupulous landlords.
- 1.2 To ensure SDUs tenancy measures are controlled effectively, there should be a designated authority to administer any new legislation.
- 1.3 The control measures should include providing tenants with an appropriate degree of security of tenure, capping rent increases, and preventing the landlords from overcharging on utility fees.

#### **2 Other Enforcement Measures**

- 2.1 Besides tenancy control measures, risk-based enforcement measures should also be implemented to contain other problems commonly found in SDUs such as building safety and health hazards as well as facilitating measures to tackle them in a progressive manner within the overall subsidised housing framework.
- 2.2 While SDU's exist to provide accommodation for the low-income and under-privileged groups in society, the Government should take effective enforcement on those unauthorized SDUs possessing serious and imminent safety and health hazards by phasing out the extreme cases, to allow the tenants a safe and better living environment.

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- 2.3 In the interim, the Government should mandate provisions of basic but essential fire safety installations and tools, including standalone smoke detectors, fire blankets and handy fire extinguishers in all existing and new SDUs.
- 2.4 A pragmatic approach is also required to allow a fair number of SDUs to be tolerated after necessary and appropriate interim improvements. We suggest the Government formulate an interim design and conversion requirements for SDUs and implement a validation scheme to encourage the upgrading of sub-standard SDUs during this transition period before catching up with the public housing supply.
- 2.5 We also call for strengthened and continued financial support by the Government to provide transitional housing via public and private collaboration, which could help alleviate the accommodation problem in the interim.

We sincerely hope that our comments will be further explored by the Government. Please contact the HKIS Secretariat at 2526 3679 if you require more information or would like us to elaborate on the above.

Thank you for your attention.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'Edwin Tang', written over a faint, illegible stamp.

Sr Edwin Tang  
President  
The Hong Kong Institute of Surveyors

cc Sr the Hon Tony Tse, Member of the Legislative Council for Architectural, Surveying, Planning and Landscape (Fax no.: 3462 2405)