



THE HONG KONG INSTITUTE OF
SURVEYORS

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Director of Fire Services
Fire Services Department
Fire Safety Command
Fire Services Headquarters Building
7/F, North Wing, No. 1 Hong Chong Road
Tsimshatsui East, Kowloon

Attn: Mr Cheung Yat Cheong

Dear Sir

**Consultation Paper on
Revised Scheme for the Implementation of Third Party Fire Safety
Certification in Hong Kong**

We refer to your letter dated 13 October 2011 inviting the Hong Kong Institute of Surveyors to comment on the revised consultation paper on the Registered Fire Engineer Scheme.

We recall that our main concern to the proposed scheme during the 2007 consultation is exclusion of many competent building professionals such as architects and surveyors for qualifying as the certifiers under the original proposed scheme. We note the recent proposed either option A or option B still excludes the participation of the building professionals other than engineers. Noting the revised registration channel under option B, we consider many building professionals with the authorized person qualification should possess adequate knowledge to perform the duty of a Registered Fire Engineer (Risk Assessment) [RFE(RA)]. If necessary, a refresher course may be prescribed for an AP to qualify for registration as the RFE(RA). By doing so, the potential supply of RFE(RA) could be raised to ensure smooth operation of the new scheme.

In order not to jeopardize the rights of the licensed premises applicant to opt for using the present service from FSD, FSD should not reduce the manpower or the service pledge for these applications. Meanwhile, time limit should be imposed on the processing time for FSD to endorse the fire safety requirements formulated by a RFE.

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Since the performance and reliability of the RFE is crucial to the success of the scheme as well as to protect the interest of the public under this scheme, a more stringent quality control system should be in place. Public should be accessible to certain important information regarding the performance or non-performance of the RFE noted by FSD during the audit check.

We agree a thorough review of the trial implementation of the proposed scheme should be conducted before further extension of the scheme to other A&A or new building works.

Thank you for your attention.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Serena Lau', is positioned above the printed name and title.

Serena Lau
President