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To: Authorized Persons Registered F.S.I. Contractors Registered Ventilation Contractors Registered Lift & Escalator Contractors Fire Insurance Association of H.K. The Association of Registered F.S.I. Contractors of Hong Kong Structural Division, H.K.I.E. Power Companies The H.K. & China Gas Co. The Lift & Escalator Contractors Association Pacific Century CyberWorks Limited Hong Kong Construction Association Director of Architectural Services Director of Buildings Director of Housing Petroleum Companies

1 June 2002

Dear Sirs,

FSD Circular Letter No. 1/2002 Rules for Fire Detection and Alarm Systems for Buildings

This Circular Letter announces the adoption, with local modifications, of Rules of the Loss Prevention Council for automatic fire detection and alarm installations for the protection of property (LPC Rules) and British Standard for the installation of automatic fire detection and alarm systems for buildings (BS 5839 : Part 1 : 1988) for the system design, installation and servicing of fire detection system.

Subsequent to the replacement of Rules of the Fire Office's Committee for automatic fire alarm installation 12th edition (FOC Rules) by the LPC Rules, the Working Group on Fire Service Installations Inspection Procedures was given the task to look into the feasibility and practicability of adopting the LPC Rules and BS 5839 for local application. After prolonged discussion and extensive consultation with the industry and respective interested parties, the Working Group has now completed its study and recommended, subject to modifications as specified in Lists One to Four annexed to this Letter, to adopt the LPC Rules and BS 5839.

The new standard will take effect from 1 January 2003 and the reference of FOC Rules in the current Code of Practice for Minimum Fire Service Installations and Equipment will be amended to LPC Rules and BS 5839 in due course.

Yours faithfully,

(LAU Kwai-shan) for Director of Fire Services

Encl.

Recommendations of the Working Group for FSI Inspection Procedures

Except those named in the following lists, all clauses stipulated in the following rules and code of practice including Notes, Commentary and Recommendations are to be followed :-

- (a) Loss Prevention Council Rules for Automatic Fire Detection and Alarm Installations for the Protection of Property (Schedule for the use of BS 5839:Part 1:1988)
- (b) BS 5839 : Part 1 : 1988 Fire Detection and Alarm Systems for Buildings, Part 1. Code of Practice for System Design, Installation and Servicing

List One	: Clauses not to be applied
List Two	: Clauses to be replaced by modified conditions
List Three	: Clauses to be provided with acceptable alternatives
List Four	: Clauses to be taken as reference only
Annex	: Table 2: Spacing and siting of detectors on honeycomb, waffle and similar ceilings (for BS Clause 12.2.3)

Abbreviations :

The following abbreviations shall be used in this document.

BS 5839 or BS	-	BS 5839 : Part 1 : 1988 – Fire Detection and Alarm Systems for Buildings, Part 1. Code of Practice for System Design, Installation and Servicing
EECoP	-	Code of Practice for the Electricity (Wiring) Regulations issued by Electrical and Mechanical Services Department
FRC Code	-	Code of Practice for Fire Resisting Construction, 1996 issued by the Buildings Department
FSCC	-	Fire Services Communication Centre
FSCoP	-	Codes of Practice for Minimum Fire Service Installations and Equipment and Inspection, Testing and Maintenance of Installations and Equipment issued by Hong Kong Fire Services Department
HKFSD or FSD	-	Hong Kong Fire Services Department
LPC Rules or LPC	-	Loss Prevention Council Rules for Automatic Fire Detection and Alarm Installations for the Protection of Property (Schedule for the use of BS 5839:Part 1:1988)

Definition :

The following definition is to be used in this document.

Fire Compartment
 An enclosed space or compartment which shall be in full compliance with the compartmentation requirements as stipulated in Clause 5 of the FRC Code. It is not intended to refer to fire compartments for separating protected areas, areas of different uses, areas of different occupancies, and areas of special hazards.

List One : Clauses not to be applied

List-		BS	Context	Reason
Item	Clause/Paragraph/ Table/Page	Clause/Paragraph/ Table/Page		
1.1	Definitions (Page 2)	-	An automatic fire detection and alarm system included in the Loss Prevention Council's <i>List of approved products and services</i> Part 3, Section 1.	Foreign definitions shall not be applied.
			Listed transmission system An alarm transmission system included in the Loss Prevention Council's <i>List of</i> <i>approved products and services</i> Part 3, Section 1."	
1.2	Clause 1 (Page 2)	-	"The insurer shall be consulted at an early stage on any aspects of the installation not conforming to these Rules."	Foreign requirements shall not be applied.
1.3	Clause 4(a) (Page 2)	-	"The insurer shall be consulted as appropriate as indicated without this document."	Foreign requirements shall not be applied.
1.4	-	Clause 7.2 Para. 1(g) (Page 12)	"For systems in buildings in multiple occupation (see 4.4) the zoning arrangement should take account of the fact that premises may not all be occupied at the same time and no zone should include areas in more than one occupancy."	It is impractical to implement the requirements of this Clause locally.
1.5	-	Clause 9.3 Para. 1 (Page 13)	"in all accessible parts of the building."	It is impractical to implement this requirement.
1.6	-	Clause 9.12 (Page 15)	 "Where intercommunication or public address equipment is used in lieu of conventional sounders, the following should be ensured. (a) Where the transmitted alarm is not a voice message, its audibility should comply with the recommendations of 9.2 for property protection systems or 9.3 for life protection systems." 	It is impractical to implement the requirements of this Clause locally.
1.7	-	Clause 9.13 (Page 17)	"In some systems much information about both the state of the system and any fire condition is available, the amount of information given is limited to that which is both necessary and sufficient."	It is impractical to implement the requirements of this Clause locally.
1.8	-	Clause 9.14 (Page 17)	"In general, fire alarm sounds should be used for other purposes only if the response required is identical to that which would be with one of the sounds being reserved for fire alarm use."	It is impractical to implement the requirements of this Clause locally.

List- Item	LPC Clause/Paragraph/ Table/Page	BS Clause/Paragraph/ Table/Page	Context	Reason
1.9	-	Clause 12.1 Para. 5 (Page 20)	"Before a fire detection system is installed for insurance purposes, early consultations should be held with the insurers."	Fire detection system is classified as one of the fire service installations under the FSCoP and should be designed in full accordance with FSD's requirements.
1.10	-	Clause 12.2.6 (Page 21)	"Although an increased ceiling height means that the fire will be larger when it is detected,, or by point-type smoke detectors if their height does not exceed 18 m."	The requirements of this Clause have been incorporated into the modified BS Clause 12.2.5.
1.11	-	Clause 12.2.16 Para. 1 (Page 22)	"In general, if the room ventilation rate exceeds four changes per hour then additional detectors may be required. For applications in computer suites or data processing areas, BS 6266 should be consulted."	The fire service requirements for ventilation/air conditioning control systems shall follow FSCoP.
1.12	-	Clause 13.1 Para. 1 (Page 24)	"In some very small premises simple hand-operated devices such as hand bells or gongs may be sufficient. However, in most other premises a more sophisticated alarm system will be necessary, able to be heard throughout the premises and perhaps incorporating automatic fire detection."	In accordance with FSCoP, pure manual systems such as hand bells, whistles, rotary gongs, etc. are not within the scope of the FSCoP and the sound level of the alarm signals shall comply with the requirements as stipulated in the modified BS Clause 9.4.1.
1.13	-	Clause 13.4 (Page 24)	", modified as recommended in 13.5 to 13.7."	As HKFSD has no such classification as type L1, L2 and L3 systems, Clause 13.5 to 13.7 which are related to type L3, L2 and L1 systems shall not be applied.
1.14	-	Clause 16.2 Para. 6 (Page 30)	"Any switch that can disconnect the power supplies to all or part of the system should be coloured red and labelled 'FIRE ALARM : DO NOT SWITCH OFF'."	The requirements of warning labels have been incorporated in the modified Para. 3 of BS Clause 16.2.

List-		BS	Context	Reason
Item	Clause/Paragraph/ Table/Page	Clause/Paragraph/ Table/Page		
1.15	-	Clause 16.5.2 (Page 32)	"Systems installed primarily to protect property (type P) , at which time a further 24 h supply will remain; hence a total duration of 48 h will be needed."	For practical purposes, the requirements on standby supply for property protection as stipulated in clauses 16.5.2.1 to 16.5.2.3 shall be the same for life protection as stipulated in the modified BS Clauses 16.5.1 and 16.5.1.1.
1.16	-	Clause 17.2 Para. 2(a) (Page 33)	"Cables used within the protected premises for the transmission of the alarm to a remote centre should be included in this class."	Once this type of cable has transmitted the signal, its function for prolong operation is no longer required.
1.17	-	Clause 17.11 (Page 35)	"and should be considered as needed to give prolonged operation in a fire (see 17.4.2)."	Once this type of communication cable has transmitted the signal to the FSCC, its function for prolong operation is no longer required.
1.18	Clause 21(b) (Page 4)	-	"The insurer shall be consulted with regard to any deviations from these Rules encountered during installation."	Inappropriate to be adopted locally.
1.19	Clause 26(c) (Page 4)	-	"The insurer shall be invited to witness these functional / compatibility tests."	Foreign requirements shall not be applied.
1.20	Clause 26(d) (Page 4)	-	"If it is uncertain that detectors have been placed in the best positions, or that adverse environmental conditions might cause detection problems, The insurer shall be invited to witness such a test."	Inappropriate to be adopted locally.
1.21	Clause 26(e) (Page 4)	-	"After the successful conclusion of the above, the installer or his supervisory listed installer shall issue the user with a certificate, described in Appendix A. Any deviations (which shall have been previously accepted by the insurer) shall be stated."	Inappropriate to be adopted locally.
1.22	-	Clause 29.2.2 Para. 2 (Page 43)	"If the fire alarm system is connected to a 999 automatic dialing unit,, but where used the inhibited state should be indicated by the use of a notice on the control equipment."	Inappropriate to be adopted locally.

List-	LPC	BS	Context	Reason
Item	Clause/Paragraph/	Clause/Paragraph/		
	Table/Page	Table/Page		
1.23	-	Clause 29.3.2	"(See appendix E)"	Foreign statutory requirements
		Para. 1(a)		shall not be applied.
		(Page 45)		
1.24	-	Appendix E	"Ionization chamber smoke detectors contain small amounts of radioactive	Foreign statutory requirements
		(Page 52)	materials, from the Health and Safety Executive, or from the	shall not be applied.
			National Radiological Protection Board*."	

List Two : Clauses to be replaced by modified conditions

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/ Table/Page	Clause/Paragraph/ Table/Page			
2.1	Scope (Page 1)	-	"This document specifies Insurers' requirements for the design, installation, commissioning/testing, use and servicing of fire detection and alarm systems primarily for the protection of property, that are additional to the requirements of BS 5839: Part 1, Life safety requirements are covered in BS 5839: Part 1: 1988."	"This document specifies HKFSD's requirements for the design, installation, commissioning/testing, use and servicing of fire detection and alarm systems primarily for the protection of property, that are additional to the requirements of BS 5839: Part 1 and all modifications to the BS to suit local applications, Life safety requirements are covered in BS 5839: Part 1: 1988."	To suit local requirements.
2.2	Clause 2 (Page 2)	-	"Only fire detection and alarm equipment conforming to one of the following shall be used: where systems do not meet the above criteria, yet are deemed most suitable for a particular situation, the Insurer shall be consulted."	"Only fire detection and alarm equipment conforming to HKFSD's requirements shall be used. List of fire service installations and equipment requiring approval from HKFSD shall follow FSD Circular Letter No. 4/98."	To suit local requirements.
2.3	Clause 3 (Page 2)	-	 "Systems shall be designed, installed and commissioned by either: (i) an LPC listed installer (ii) an installing company not listed but supervised by an LPC listed installer." 	"All installation, maintenance, inspection, testing and commissioning works shall be done by a registered fire service installation contractor. In case there are electrical works involved, all the associated electrical works shall be done by a registered fire service installation contractor who shall also be a registered electrical contractor."	To suit local requirements.
2.4	Clause 6(d) (Page 3)	-	"(Specific reference to BS Clause 6.6). No single detection loop circuit shall cover an area greater than 10 000 m ² or be used to monitor more than five detection zones unless prior agreement has been given by the insurer."	"No single detection loop circuit shall cover an aggregate floor area greater than 10,000 m ² calculated on those portions of the premises installed with fire detectors unless prior agreement has been given by the HKFSD."	To clarify the calculation method of 10 000 m^2 . The limits on the number of detectors for one single loop circuit should be in accordance with manufacturer's recommendation.

List- Item	LPC Clause/Paragraph/	BS Clause/Paragraph/	Context	Replaced by	Reason
Item	Table/Page	Table/Page			
2.5	-	Clause 6.6.1 Para. 1 (Page 8)	"Care should be taken to ensure compatibility of all components which are part of the fire alarm system or connected with it in any way (see 6.7)."	"Care should be taken to ensure compatibility of all components which are part of the fire alarm system or connected with it in any way (see 6.7). Manufacturer's confirmation or certification on the compatibility of all components including the types and brand of detector used shall be provided for verification in each HKFSD's fire service installation acceptance test or inspection."	To suit local practice and requirements.
2.6	-	Clause 6.6.1 New Para. (Page 8)	-	Add the following Para. to the last Para. of this Clause : "Details of fire service installations and equipment requiring approval from HKFSD shall follow the list in the FSD Circular Letter No. 4/98."	To add local practice and requirements.
2.7	_	Clause 6.6.2 Para. 1(3) (Page 8)	"if a circuit is used for more than one zone and multiple faults within one fire compartment could remove protection from an area greater than that allowed under 7.2 (a) to (d) for a zone, then the circuit within that compartment is suitably protected (see 17.15);"	"if a circuit is used for more than one zone and multiple faults within one fire compartment could remove protection from an area greater than that allowed under 7.2 (a) to (d) for a zone, then the circuit within that compartment shall be mechanically protected in accordance with Clause 17.5.2;"	To clarify the meaning of "suitably protected" for alarm circuit under this clause.
2.8	-	Clause 6.6.2 Para. 1(4) (Page 8)	"two simultaneous faults should not remove protection from an area greater than 10 000m ² ."	"two simultaneous faults should not remove protection from an aggregate area greater than 10,000 m ² calculated on those portions of the premises installed with fire detectors."	To clarify the calculation method of 10 000 m ² .

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/ Table/Page	Clause/Paragraph/ Table/Page			
2.9	-	Clause 6.6.2 Para. 4 (Page 8)	"In particular it is desirable that provision should be made so that individual detectors can be tested without either sounding an alarm or requiring the complete system to be disabled to prevent such an alarm."	"In particular it is required that provision should be made so that individual detectors can be tested without either sounding an alarm or requiring the complete system to be disabled to prevent such an alarm."	To confirm the mandatory requirements of this Para.
2.10	-	Clause 6.6.3 Para. 1 (Page 8)	"Any sounder that is necessary in order to reach the audibility levels recommended in clause 9 should be capable of electrical disconnection from the alarm sounder circuit only by the used of a special tool"	"Any sounder that is necessary in order to reach the audibility levels recommended in clause 9 should be capable of electrical disconnection from the alarm sounder circuit only by the use of a tool recommended by the manufacturer"	
2.11	-	Clause 7.2 Para. 1(a) (Page 11)	"The floor area of a single zone should not exceed 2000 m ² ."	"The aggregate floor area of a single detector zone should not exceed 2,000 m^2 calculated on those portions of the premises installed with fire detectors."	To clarify the calculation method of 2000 m ² .
2.12	-	Clause 7.2 Para. 1(f) (Page 11)	"In systems containing only manual call points (type M systems) location of a fire will usually it may be difficult to locate a call point from which an alarm originated. NOTE 1. This relaxation on the size of the zone does not apply to the recommendations for power supplies in type M systems given in 16.6."	"The zoning of manual call points (break glass units) shall be at least one zone per floor or storey."	To suit local practice.
2.13	Clause 8(b) (Page 3)	-	"The method of connection shall be via an LPC listed transmission system."	"The method of connection shall be via an HKFSD acceptable transmission system."	To suit local practice.

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/	Clause/Paragraph/			
	Table/Page	Table/Page			
2.14	Clause 8(d)	-	"A permanently manned on-site private	"A permanently manned on-site private	To suit local practice.
	(Page 3)		fire brigade control room may be	fire brigade control room may be	
			acceptable as an alternative to the	acceptable as an alternative to the	
			facilities listed in Clause 8 (c), at the	facilities listed in Clause 8 (c), at the	
			discretion of the insurer. (Also see	discretion of the Director of Fire	
			Clause 3 (b))."	Services."	
2.15	-	Clause 8.1 – 8.3	"8.1 General	"A direct line connection shall be	To suit requirements as
		(Page 12)	For a fire detection system to give the	provided to the FSCC or such other	stipulated in FSCoP.
			maximum benefit, and to	premises as may be agreed with the	
			any consequential need for fire	Director of Fire Services."	
			protection."		
2.16	-	Clause 9.1	"and its case should be clearly marked	"and its case should be painted in red	To suit local practice.
		Para. 2	'FIRE ALARM'."	colour and clearly marked 'FIRE	
		(Page 13)		ALARM' '火 警' in white colour. The	
				height of all the English and Chinese	
				wordings shall not be less than 10 mm	
				and 15 mm respectively."	
2.17	-	Clause 9.2	"In the areas where an alarm is required,	"In the areas where an alarm is required,	To adopt a more practical way for
		Para. 1	it should meet the audibility	it should meet the audibility	implementation.
		(Page 13)	recommendations of 9.4."	recommendations in 9.4 except all	
		(required staircases as defined in the	
				FRC Code and the associated protected	
				lobbies which lead only to such	
				staircases."	

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/	Clause/Paragraph/			
	Table/Page	Table/Page			
2.18	-	Clause 9.3	"The number of fire alarm sounders	"The number of fire alarm sounders	To adopt a more practical way for
			used should be sufficient to produce the	*	implementation.
		(Page 13)	sound level recommended in 9.4 in all	sound level recommended in 9.4 except	
			accessible parts of the building."	all required staircases as defined in the	
				FRC Code and the associated protected	
				lobbies which lead only to such	
				staircases."	-
			"At least one sounder should be	"All buildings except domestic	
			provided in each fire compartment."	buildings shall be provided with at least one sounder in each fire compartment."	
2.19		Clause 9.4.1	<i>"Level of sound</i> . A minimum sound	<i>"Level of sound</i> . For domestic building,	To adopt a more practical
2.19	-		level of either 65 dB(A), or 5 dB(A)	a minimum sound level of either 60	approach for the requirements on
			above any other noise likely to persist	dB(A), or 5 $dB(A)$ above any other	the audibility of alarms as agreed
			for a period longer than 30 s,	noise likely to persist for a period longer	
			can reasonably be expected to wake a	than 30 s, whichever is the greater. For	Working Group for FSI
			sleeping person in most circumstances."	other types of building, a minimum	Inspection Procedures.
				sound level of either 65 dB(A), or 5	1
				dB(A) above any other noise likely to	
				persist for a period longer than 30 s,	
				whichever is the greater.	
				The location of all sound measurement	
				shall be taken at three (3) metres from	
				the inside of the main entrance door	
				with all doors shut off at	
				(a) all flats for domestic buildings,	
				(b) all rooms for institutional / hotel	
				buildings, and	
				(c) all rooms / premises for other types	
				of buildings."	

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/	Clause/Paragraph/			
	Table/Page	Table/Page			
2.20	-	Clause 9.5	"If the fire alarm system extends to	"The zoning on the sounder operation of	
		Para. 2	\mathcal{U}	the manual and automatic fire detection	in FSD Circular Letter No. 4/96.
		(Page 14)	building unlikely to be affected by a fire		
			in one zone, perhaps	requirements as stipulated in FSD	
				Circular Letter No. 4/96, Part VIII, Item	
		~ ~ ~	difficult egress."	4."	
2.21	-	Clause 9.7	"but not so high as to cause difficulty in		
		Para. 4	vision due to glare."	vision due to glare.	fire alarm system.
		(Page 14)		In addition, the provisions, flashing light	
				intensity, and colour, labeling, power	
				supply requirement shall comply with	
				the requirements as stipulated in FSD Circular Letter No. 4/2001. Other	
				acceptable standard and requirements for the design of the visual fire alarm	
				signals and system can also be found in	
				FSD Circular Letter No. 4/2001."	
2.22	-	Clause 9.11	"In addition to the silencing switch at	"No silencing switch device can be	To confirm that the installation of
2.22		Para. 3	the control equipment, provision may be		remote silencing switches are not
		(Page 15)		devices have to be incorporated in either	
				the main fire services control panel or a	, in the set of the se
				repeater panel."	
			Operation of a remote silencing switch	X X	
			should :		
			(1)		
			(2)		
			(3) be automatically reset on operation		
			of the main silencing switch or		
			cessation of the alarm condition."		

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/	Clause/Paragraph/			
	Table/Page	Table/Page			
2.23	-	Clause 10.2	"Manual call points should be located	"Manual call points should be located at	To clarify that manual call points
			on exit routes and in particular on the	each hose reel point and, in particular,	should not be located in the floor
			floor landings of stairways and at exits	adjacent to all storey exits (or the	landings of staircases and should
			to open air."	entrance lobby in lieu if such lobby	be installed at all storey exits and
				leads only to the storey exits) and	at locations as stipulated in
				adjacent to all exits to open air (whether	
				or not the exits are specifically	point.
				designated as fire exits)."	
2.24	-	Clause 10.2	"In general, call points should be fixed	"In general, call points should be fixed	To comply with the requirements
			at a height of 1.4 m above the floor, at	at a height of 1.2 m above the finished	as stipulated in FSCoP.
			easily accessible, well illuminated and	floor level, at easily accessible, well	
			conspicuous positions free from obstruction."	illuminated and conspicuous positions free from obstruction."	
2.25	Clause 12(h)				In order to suit current local
2.23	Clause 12(b) (Page 3)	-	"With reference to Table 1 (Limits of ceiling heights), the "Rapid attendance"	"The maximum ceiling height design and installation limits for detector shall	practice, the data shown in the
	(rage 5)		limits are only applicable for Class A	follow the "Rapid attendance" limits of	column of "Rapid attendance" in
			installations (see Clause 3(b), otherwise		Table 1 shall be used as general
			the "General limits" shall be used."	ruble i (Eminis of cerning heights).	design and installation limits.
2.26	_	Clause 12.2.3	-	Add the following Para. to the last Para.	To add the spacing and siting
		New Para.		of this Clause :	requirements of detectors on
		(Page 20)			honeycomb, waffle and similar
				"Where a ceiling comprises a series of	ceilings.
				small cells (a honeycomb or waffle	-
				ceiling), detector spacing and siting	
				should be in accordance with Table 2 of	
				the Annex."	

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/	Clause/Paragraph/			
	Table/Page	Table/Page			
2.27	-	Clause 12.2.5 (Page 21)	"detectors should not normally be mounted on ceilings higher than the general limits of table 1. If small sections of a ceiling (not exceeding in total 10 % of the ceiling area) exceed in height the general limits of table 1, those higher sections may be protected by point-type heat detectors provided that the ceiling height in the higher sections does not exceed 10.5 m, or by point-type smoke detectors provided that the ceiling height in the higher	"detectors should not normally be mounted on ceilings higher than the rapid attendance limits of table 1. If small sections of a ceiling (not exceeding in total 10 % of the ceiling area) exceed in height the rapid attendance limits of table 1, those higher sections may be protected by point-type heat detectors provided that the ceiling height in the higher sections does not exceed 15 m, or by point-type smoke detectors provided that the ceiling	In order to suit current local practice, the data shown in the column of "Rapid attendance" in Table 1 shall be used as general design and installation limits.
2.28	-	Clause 12.2.11 (Page 21)	sections does not exceed 12.5 m." "Voids less than 800 mm in height need not have independent coverage precautions against the deposition of dirt or dust may be	height in the higher sections does not exceed 18 m." "Voids or that portion of voids 800 mm or less in height / depth shall not require the installation of detectors."	To suit local practice.
			needed."		
2.29	-	Clause 12.2.17 (Page 22)	"If a detector is concealed, for example in a void, then it may be desirable to provide a remote indication of its operation. If necessary a label should be provided at the indicator to show the location of the detector."		installed in concealed space.
2.30	Clause 13(a) (Page 4)	-	"However, where life safety is also a consideration, Clause 13 shall be consulted and any measures regarded as necessary by the Insurers shall be in addition to those required in BS Clause 12."	"However, where life safety is also a consideration, Clause 13 shall be applied in addition to those required in BS Clause 12."	To suit local requirements.

List- Item	LPC Clause/Paragraph/ Table/Page	BS Clause/Paragraph/ Table/Page	Context	Replaced by	Reason
2.31	-	Clause 13.1 Para. 3 (Page 24)	"A type M system, operated by manual call points only, may be all that is needed, or alternative escape routes will always be available."	"In addition to the requirements of this standard, all manual fire alarm systems shall be in full compliance with the specification of fire alarm systems as stipulated in FSCoP."	To suit additional requirements as stipulated in FSCoP.
2.32	Clause 14(a) (Page 4)	-	"are not permitted unless prior agreement has been given by the insurer."	"are not permitted unless prior agreement has been given by the Director of Fire Services."	To suit local requirements.
2.33	-	Clause 14.6 Para. 1 (Page 27)	"it unlikely that a fire would go undetected by human agency, it may be useful to consider a time related, dual sensitivity system."	"it unlikely that a fire would go undetected by human agency, subject to the approval from the Director of Fire Services, the incorporation of time related, dual sensitivity system in the fire detection system may be considered. The approval criteria for such system shall follow FSD Circular Letter No.4/2001."	To suit requirements as stipulated under FSD Circular Letter No. 4/2001.
2.34	-	Clause 14.6 Para. 4 (Page 27)	"Repeated switch operations may be used to extend the delay, but the delay should not extend more than 45 min after the last operation of the switch."	"Repeated switch operations should not extend more than 6 min after the last operation of the switch."	To suit requirements as stipulated under FSD Circular Letter No. 4/2001.
2.35	-	Clause 14.7 Para. 1 (Page 27)	"it may be desirable to delay the automatic transmission of an alarm to the fire brigade for a sufficient time to allow the alarm to be investigated. For this purpose the incorporation of a transmission signal delay unit may be considered."	"it may be desirable to delay the automatic transmission of an alarm to the fire brigade for a sufficient time to allow the alarm to be investigated. For this purpose, subject to the approval from the Director of Fire Services, the incorporation of a transmission delay unit may be considered. The approval criteria for such unit shall follow FSD Circular Letter No.4/2001."	To suit requirements as stipulated under FSD Circular Letter No. 4/2001.

2.37 Para. 3(b) (Page 28) manned centre may be delayed for an initial period not exceeding 2 min." "indicating that an investigation is in progress, subject to the approval by the por server, the manual operation, subject to agreement with interested parties." manned centre may be delayed indicating that an investigation is in progress, subject to the approval by the Director of Fire Services, then the alarm may be further delay for a period, not exceeding 5 min from the manual operation." under FSD Circular Letter No. 4/2001. 2.38 - Clause 14.7 Para. 4 (Page 28) "The alarm should be automatically transmitted to the fire brigade after a min, unless a manual override operation has been carried out." "The alarm should be automatically transmitted to the fire brigade after a min, unless a manual override operation has been carried out." To suit requirements as stipulate under FSD Circular Letter No. 4/2001. 2.39 - Clause 15.2.1 (Page 28) "Such that the response of alarm sounders meets the recommendations of 10.1." "such that the response of alarm sounders meets the recommendations of 10.1." To suit requirements as stipulate with strobe light for use in conjunction with automatic fire alarm system shall be approved by HKFSD." 2.40 - Clause 15.2.2 (Page 28) "However, if the area covered by a manual system could fail within the recommendations of 7.2, irrespective of how many zones are actually used, then control and indicating equipment complying with all the recommendations of 3.2, irrespective of how many zones are actually used, then control and indicating equipment complying with all the recommendations of appendix G may be accepta	List-	LPC	BS	Context	Replaced by	Reason
2.36 - Clause 14.7 Para. 3(b) (Page 28) "The call to the fire brigade or remote manned centre may be delayed for an (Page 28) "The call to the fire brigade or remote manned centre may be delayed for an (Page 28) The call to the fire brigade or remote manned centre may be delayed for an progress, subject to the approval by the progress, subject to the approval by the progress, then the alarm may be delayed (Page 28) To suit requirements as stipulate under FSD Circular Letter No. 4/2001. 2.37 - Clause 14.7 Para. 3(c) (Page 28) "The alarm should be automatically transmitted to the fire brigade after fixed delay period not greater than 2 min, unless a manual override operation has been carried out." "The alarm should be automatically min, unless a manual override operation has been carried out." To suit requirements as stipulate under FSD Circular Letter No. 4/2001. 2.39 - Clause 15.2.1 (Page 28) "such that the response of alarm sounders meets the recommendations of 10.1." "such that the response of alarm min, unless a manual override operation has been carried out." To suit requirements as stipulate with automatic fire alarm system shall be approved by HKFSD." 2.40 - Clause 15.2.2 (Page 28) "However, if the area covered by a manual system could fall within the recommendations of 7.2, irrespective of how many zones are actually used, then control and indicating equipment complying with all the recommendations of 7.2, irrespective of how many zones are actually used, then control and indicating equipment complying with all the recommendations of 7.2, irrespective of how many zones are actually used, then c	Item	e i	0 1			
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2.37 - Clause 14.7 Para. 3(c) (Page 28) initial period not exceeding 2 min." initial period not exceeding 1 min." 4/2001. 2.37 - Clause 14.7 Para. 3(c) (Page 28) "indicating that an investigation is in in from the manual operation, subject to agreement with interested parties." in interested parties." To suit requirements as stipulate progress, subject to the approval by the due transmitted to the fire brigade after a fixed delay period not greater than 1 (Page 28) To suit requirements as stipulate under FSD Circular Letter No. 2.39 - Clause 15.2.1 (Page 28) "The alarm should be automatically transmitted to the fire brigade after a fixed delay period not greater than 1 min, unless a manual override operation has been carried out." "Such that the response of alarm sounders meets the recommendations of 10.1. All fire alarm soundres integrated with strobe light for use in conjunction with automatic fire alarm system shall be approved by HKFSD." To suit requirements as stipulate in FSD Circular Letter No. 4/98. detectors, alarm sounders integrated with strobe light for use in conjunction with automatic fire alarm system shall be approved by HKFSD." To suit requirements as stipulate in FSD Circular Letter No. 4/98. detectors, alarm sounders integrated with strobe light for use in conjunction with automatic fire alarm system shall be approved by HKFSD." 2.40 - Clause 15.2.2 (Page 28) "However, if the area covered by a manual system could fall within the limits of a single zone under the recommendations of 7.2, irrespective of how many zones are actually used, then corombying with all the reco	2.36	-	Clause 14.7	•	•	To suit requirements as stipulated
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(Page 28) manual system could fall within the limits of a single zone under the recommendations of 7.2, irrespective of how many zones are actually used, then control and indicating equipment complying with all the recommendations of appendix G may be acceptable subject to the approval of the			~			
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				appropriate authority."		

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/	Clause/Paragraph/			
	Table/Page	Table/Page			
2.41	-		"If it is necessary for practical reasons to mount the control and indicating equipment outside the building Similar precautions may be necessary if the equipment has to be installed in a severe environment within a building."	"A weather proof protective enclosures with adequate ventilation should be provided to protect the control and indicating equipment from being damaged by high humidity and water if the equipment has to be installed in a severe environment within or outside a building."	To clarify the requirements for protection of control and indicating equipment from the effect of severe environment.
2.42	-	Clause 15.4.1 (Page 29)	"The indications should be such that they can be easily, quickly and unambiguously related to the position in the building from which the alarm has originated."	"The indications should be displayed in both Chinese and English such that they	To suit local practice.
2.43	-	Clause 16.2 Para. 1 (Page 30)	"Any cable or apparatus directly connected to a public or private distribution supply should be in accordance with the current edition of the IEE Wiring Regulations in accordance with the IEE Wiring Regulations : TN-C, TN-S, TN-C-S, TT."	"Any cable or apparatus directly connected to the public supply shall be in accordance with the current edition of the EECoP."	To suit local practice.

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/	Clause/Paragraph/			
	Table/Page	Table/Page			
2.44	-	Clause 16.2	"Connections to the mains supply	"Connections to the mains supply	To suit local practice.
		Para. 2	should be via an isolating protective	should be via an isolating protective	
		(Page 30)	device (e.g. an isolating switch-fuse)	device (e.g. an isolating switch-fuse)	
			reserved solely for the purpose, its cover	reserved solely for all the fire service	
			coloured red and labelled 'FIRE	installations.	
			ALARM : DO NOT SWITCH OFF'.	Except fused spur units installed	
			The isolating protective device should	adjacent to fire alarm and repeater	
			be secured from unauthorized operation.	panels, every isolator, switch and	
			It may be desirable for the isolating	protective device that is capable of	
			protective device to be contained in a	disconnecting the mains supply to the	
			securely closed box with a frangible	fire alarm system should be situated in a	
			cover."	position inaccessible to unauthorized	
				persons or be protected against	
				unauthorized operation."	

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/	Clause/Paragraph/			
	Table/Page	Table/Page			
2.45	-	Clause 16.2	"An additional warning label should be	"Every isolator and protective device	To clarify the requirements and
		Para. 3	provided,, a label should be	that can isolate the supply to the fire	provision of warning labels.
		(Page 30)	fixed to the main isolating device	alarm system, other than the main	
			reading 'Warning : this switch also	isolator for the building, should be	
			controls the supply to the fire alarm	labelled either :	
			system.' "	(a) 'FIRE ALARM' '火 警 警 報', in	
				the case of a protective device that	
				serves only the fire alarm circuit, but	
				incorporates no switch;	
				(b) 'FIRE ALARM. DO NOT SWITCH	
				OFF' '火 警 警 報. 切 勿 切 斷 電 源',	
				in the case of a switch (whether	
				incorporating a protective device or not)	
				that serves only the fire alarm circuit.	
				(c) 'WARNING. THIS SWITCH ALSO	
				CONTROLS THE SUPPLY TO THE	
				FIRE ALARM SYSTEM' '警告.此電	
				掣乃供應火警警報系統電源',	
				in the case of any switch that	
				disconnects the mains supply to both the	
				fire alarm system and to other circuits.	
				All labels shall be engraved in white	
				letter/character with red colour	
				background. The height of all the	
				English and Chinese wordings shall not	
				be less than 10 mm and 15 mm	
				respectively."	

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/	Clause/Paragraph/			
	Table/Page	Table/Page			
2.46	-	Clause 16.2	"The design of the system should ensure		To suit local practice.
		Para. 4	that residual current devices are not	system should not be protected by a	
		(Page 30)	necessary as a preventive measure	residual current device unless this is	
				necessary to comply with the	
			response to a fault on the general wiring		
			does not result in interruption of the fire	5	
			alarm supply."	electrical safety, a fault on any other	
				circuit or equipment in the building	
				should not be capable of resulting in	
				isolation of the supply to the fire alarm."	
2.47	-	Clause 16.3.1	"Where no public supply system is	"Where no public supply system is	This should be considered case
		Para. 2	available, privately generated power	available, subject to the approval of the	by case on each individual
		(Page 30)	may be used."	Director of Fire Services, privately	project.
				generated power may be used."	
2.48	-	Clause 16.5.1	"Systems installed primarily for life	"Systems installed primarily for life	For practical purposes,
		(Page 31)	safety (type L)"	safety and / or Property Protection (type	requirements on duration of
				L and P)"	standby supply for both life
					safety and property protection
					shall be the same.
2.49	-	Clause 16.5.1.1	"In a system installed to protect life, the	"In a system installed to protect life and	This clause shall apply to both
		(Page 31)	fire alarm system should be in an	property, the fire alarm system should	systems on life safety and
			operation condition at all times that	be in an operation condition at all	property protection.
				times."	
2.50	-	Clause 16.6	"Power supplies for manual systems	"Power supplies for manual systems	Requirements for power supply
		(Page 32)	should generally comply with the	should generally comply with the	of manual system shall be the
			recommendations of 16.1 to 16.5.	recommendations of 16.1 to 16.5."	same as that for automatic
			However, if the area covered by a		system.
			manual system could fall within the		
			limits if public or private		
			electricity mains are not available."		

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/ Table/Page	Clause/Paragraph/ Table/Page			
2.51	Clause 17(b) (Page 4)	-	"One of the cable types indicated in BS Clause 17.4.2 or a cable determined by LPC to be equivalent* shall be used. However, should the cable types be unsuitable for a certain application (eg transmission of high baud rate digital information), then another cable type may be used subject to the agreement of the insurer."	"One of the cable types indicated in BS Clause 17.4.2 or a cable comply with other international standards recommended by the manufacturer and acceptable to HKFSD shall be used. However, should the cable types be unsuitable for a certain application (eg transmission of high baud rate digital information), then another cable type may be used subject to the assessment and acceptance of the Director of Fire Services."	To suit local practice.
2.52	Clause 19(a) (Page 4)	-	"The insurer shall be consulted with regard to the operation of ancillary services by the fire detection and alarm system."	"HKFSD shall be consulted with regard to the operation of ancillary services by the fire detection and alarm system."	To suit local practice.
2.53	-	Clause 24.4.1 Para. 1 (Page 39)	"The installation should be undertaken generally in accordance with the latest edition of the IEE Wiring Regulations. NOTE 1. Although those parts of the fire alarm system connected to a safety source are specifically excluded from coverage by the IEE Wiring Regulations, the general principles of good practice in wiring installations outlined in the regulations should be followed throughout the fire alarm system."	"The installation shall be done in accordance with the latest edition of the EECoP."	To suit local practice.

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/ Table/Page	Clause/Paragraph/ Table/Page			
2.54	-	Clause 24.4.3 (Page 39)	"it should be enclosed in a suitable and accessible junction box labelled 'FIRE ALARM' to avoid confusion with other services."	"it should be enclosed in a suitable and accessible junction box labelled 'FIRE ALARM' '火 警 警 報' engraved in white letter/character with red colour background. The height of all the English and Chinese wordings shall not be less than 10 mm and 15 mm respectively to avoid confusion with other services."	To suit local practice.
2.55	-	Clause 25.4 (Page 40)	"If detectors contain radioactive material, then the installer may have responsibilities under legislation (see appendix E)."	"If detectors contain radioactive material, then the installer may have responsibilities under radiation Ordinance Cap 303. License will be required if the total radioactivity of the detectors exceeds a certain limit as determined by the Hong Kong Radiation Board."	To suit local statutory requirements.
2.56	Clause 26(b) (Page 4)	-	"An inspection of the installation shall be carried out in accordance with BS Clause 26.2, 26.3 and 26.4."	"An inspection and HKFSD's acceptance test of the installation shall be carried out in accordance with BS Clause 26.2, 26.3, 26.4 and 26.6."	To incorporate the statutory requirements in the modified BS Clause 26.6 for HKFSD's acceptance test.
2.57	-	Clause 26.3 (Page 40)	"should be in accordance with the IEE Wiring Regulations."	"should be in accordance with the EECoP."	To suit local requirements.
2.58	-	Clause 26.4 (Page 40)	"should be tested to ensure compliance with the IEE Wiring Regulations."	"should be tested to ensure compliance with the EECoP."	To suit local requirements.

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/	Clause/Paragraph/			
	Table/Page	Table/Page			
2.59	-	Clause 26.6	"26.6 Certification	"26.6 Acceptance Test and Certification	To suit local requirements.
		(Page 40)	The installer should certify that the	The installer should certify that the	
			installation complies with the	installation complies with the	
			recommendations of this Part of BS	recommendations of this Part of BS	
				5839 using HKFSD's prescribed forms.	
				Upon the completion and testing of all	
			should be given by the installer (see	the required fire service installations, the	
			appendix B)."	Authorized Person and the registered	
				fire service installation contractor shall	
				arrange with HKFSD for inspection and	
				acceptance tests. Details shall be in	
				accordance with the procedures as stipulated in the FSCoP."	
2.60	Clause 27(a)	×	"The insurer shall be consulted with	"HKFSD shall be consulted with regard	To suit local requirements.
2.00	(Page 5)			to extensions and alterations to existing	to suit local requirements.
	(rage 5)			systems."	
2.61		Clause 27	"Following completion of the	"Following completion of the	To suit local requirements.
2.01	-	Para. 2	alterations, inspection, testing,	alterations, inspection, testing, and	To suit local requirements.
		(Page 41)	commissioning and certification should	commissioning, Forms FSI/314A, FS	
		(1 4 50 11)	be carried out as recommended in	251 together with one set as-fitted	
			Clause 26."	drawings should be submitted to	
				HKFSD for comment, spot checking	
				and record. "	
2.62	-	Clause 27	"fault conditions should only be	"fault conditions should only be	To suit local requirements.
		Para. 3		undertaken by a registered fire service	<u>^</u>
		(Page 41)		installation contractor."	
			"sensor locations to be altered by	"sensor locations to be altered by a	
			personnel authorized by the responsible	registered fire service installation	
			person."	contractor."	

List-	LPC	BS	Context	Replaced by	Reason
Item	Clause/Paragraph/ Table/Page	Clause/Paragraph/ Table/Page			
2.63	Clause 29(a) (Page 5)	-	"A servicing schedule shall be implemented and shall be agreed by the insurer."	"All installations shall be maintained, inspected and certified by a registered fire service installation contractor in accordance with the maintenance requirements as stipulated in FSCoP or BS Clause 29 at least once in every 12 months."	To suit local practice or allow flexibility by adopting the requirements of Clause 29 as an alternatives to the maintenance requirements as stipulated in the FSCoP.
2.64	Clause 29(b) Para. 2 (Page 5)	-	"DISCONNECTIONS OR FAILURES OF AN INSTALLATION OR PARTS OF AN INSTALLATION LIKELY TO LEAVE AREAS UNPROTECTED FOR 12 HOURS OR MORE SHALL BE MADE KNOWN TO THE INSURERS IMMEDIATELY"	"DISCONNECTIONS OR FAILURES OF AN INSTALLATION OR PARTS OF AN INSTALLATION LIKELY TO LEAVE AREAS UNPROTECTED OVERNIGHT OR OVER 24 HOURS SHALL BE MADE KNOWN TO HKFSD IN ACCORDANCE TO THE REQUIREMENTS AS STIPULATED IN FSD CIRCULAR LETTER NOS. 1/99 AND 4/99."	To incorporate the requirements of FSD Circular Letter Nos. 1/99 and 4/99.
2.65	-	Clause 29.1 Para. 1 (Page 43)	"Normally an agreement should be made with a manufacturer, supplier or other competent contractor for regular servicing."	"An agreement should be made with a registered fire service installation contractor for regular servicing."	To suit local requirements.
2.66	-	Clause 29.2.8 Para. 1 (Page 44)	"The responsible person should ensure that every 5 years (or more frequently if the building electrical system is tested at shorter intervals) the installation should be tested in accordance with the testing and inspection requirements of the IEE Wiring Regulations."	"The responsible person should ensure that the installation should be tested in full accordance with the EECoP."	To suit local requirements.

List Three : Clauses to be provided with acceptable alternatives

List- Item	LPC Clause/Paragraph/	BS Clause/Paragraph/	Context	Alternative	Reason
	Table/Page	Table/Page			
3.1	Clause 6(e) (Page 3)	-		"If devices are to be used in hazardous environments, then their design shall be certified by the British Approval Service for Electrical Equipment in Flammable atmospheres (BASEEFA) or equivalent and approved by the HKFSD."	Subject to approval by HKFSD, other equivalent standards could be adopted.
3.2	-	Clause 6.8 Para. 1 (Page 10)	"6.8 Compliance with British Standards In general, all components used in the system should comply with relevant British Standards,"	"6.8 Compliance with British Standards or Other Standards In general, all components used in the system should comply with relevant British Standards or other standards acceptable to HKFSD,"	To allow more flexibility by adopting other standards in addition to the quoted BS standards.
3.3	-	Clause 6.8 Para. 2 (Page 10)	"Where there is no relevant British Standard, non-standard components may be used,"	"Where there is no relevant British Standard or other acceptable standards, subject to the agreement with HKFSD, non-standard components may be used,"	
3.4	-	Clause 6.9 Para. 1(c) (Page 10)	"The decision algorithm used within the control system should be such that the sensitivity of the system cannot fall outside that specified in the relevant Part of BS 5839, BS 5445 or BS 5446, except in time related systems (see 14.6)."	control system should be such that the sensitivity of the system cannot fall outside that specified in the relevant Part of BS 5839, BS 5445 or BS 5446 or other standards acceptable to HKFSD, except in time related systems (see 14.6)."	adopting other standards in addition to the quoted BS standards.
3.5	-	Clause 9.3 Para. 1 (Page 13)	", and hence a minimum of two sounders should be provided even if the recommended sound level could be achieved with a single sounder."	May not be applied	Not mandatory requirement to provide standby alarm sounders.
3.6	-	Clause 10.1 Para. 1 (Page 17)	"Manual call points should comply with BS 5839: Part 2."	"Manual call points should comply with BS 5839: Part 2 or other standards acceptable to HKFSD."	To allow more flexibility by adopting other standards in addition to the quoted BS standards.

List- Item	LPC Clause/Paragraph/ Table/Page	BS Clause/Paragraph/ Table/Page	Context	Alternative	Reason
3.7	-	Clause 11.2 Para. 3 (Page 18)	"Point heat detectors should comply with BS 5445: Part 5,"	"Point heat detectors should comply with BS 5445: Part 5 or other standards acceptable to HKFSD,"	To allow more flexibility by adopting other standards in addition to the quoted BS
			"where heat detectors complying with BS 5445: Part 8 should be used."	"where heat detectors complying with BS 5445: Part 8 or other standards acceptable to HKFSD should be used."	standards.
3.8	-	Clause 11.3 Para. 4 (Page 18)		"Point smoke detectors should comply with BS 5445: Part 7 or other standards acceptable to HKFSD"	To allow more flexibility by adopting other standards in addition to the quoted BS
			"Optical beam smoke detectors should comply with BS 5839: Part 5."	"Optical beam smoke detectors should comply with BS 5839: Part 5 or other standards acceptable to HKFSD."	standards.
3.9	-	Clause 11.5.2 Para. 2 (Page 19)	"heat detectors complying with BS 5445: Part 8 should be used."	"heat detectors complying with BS 5445: Part 8 or other standards acceptable to HKFSD should be used."	To allow more flexibility by adopting other standards in addition to the quoted BS standards.
3.10	-	Table 1 (Page 21)	"Heat detectors BS 5445: Part 5"	"Heat detectors BS 5445: Part 5 or other standards acceptable to HKFSD"	To allow more flexibility by adopting other standards in addition to the quoted BS
				"High temperature heat detectors BS 5445: Part 8 or other standards acceptable to HKFSD"	standards.
				"Optical beam smoke detectors BS 5839: Part 5 or other standards acceptable to HKFSD"	
3.11	-	Clause 12.3.2 (Page 23)	"In such cases a heat detector complying with BS 5445: Part 8 should be used."	"In such cases a heat detector complying with BS 5445: Part 8 or other standards acceptable to HKFSD should be used."	To allow more flexibility by adopting other standards in addition to the quoted BS standards.

List- Item	LPC Clause/Paragraph/ Table/Page	BS Clause/Paragraph/ Table/Page	Context	Alternative	Reason
3.12	-	Clause 13.3.2 (Page 24)	"These should comply with BS 5839: Part 5, BS 5445: Part 7"	"These should comply with BS 5839: Part 5, BS 5445: Part 7 or other standards acceptable to HKFSD"	To allow more flexibility by adopting other standards in addition to the quoted BS standards.
3.13	-	Clause 13.3.3 (Page 24)	"These should comply with BS 5445: Part 5 or, in special cases, BS 5445: Part 8 (see 11.5.2)."	"These should comply with BS 5445: Part 5 or, in special cases, BS 5445: Part 8 or other standards acceptable to HKFSD (see 11.5.2)."	To allow more flexibility by adopting other standards in addition to the quoted BS standards.
3.14	-	Clause 15.2.1 (Page 28)	"Control and indicating equipment for automatic fire alarm systems should comply with BS 5839: Part 4*."	"Control and indicating equipment for automatic fire alarm systems should comply with BS 5839: Part 4* or other standards acceptable to HKFSD."	To allow more flexibility by adopting other standards in addition to the quoted BS standards.
3.15	-	Clause 15.2.2 (Page 28)	"Control and indicating equipment for manual systems should comply with BS 5839: Part 4*."	5839: Part 4* or other standards acceptable to HKFSD."	To allow more flexibility by adopting other standards in addition to the quoted BS standards.
3.16	-	Clause 17.3 New Para. (Page 33)	-	Add the following Para. directly below Para. 1, item (k) : "Subject to the assessment and acceptance of the HKFSD, cables complying with other international standards recommended by the manufacturer could be used."	To allow more flexibility by adopting other international standards in addition to the quoted BS standards.
3.17	-	Clause 26.2 (Page 40)	"that the methods, materials and components used comply with this Part of BS 5839, and that the record drawings and operating instructions (see 26.1) have been supplied."	"that the methods, materials and components used comply with this Part of BS 5839 or other standards acceptable to HKFSD, and that the record drawings and operating instructions (see 26.1) have been supplied."	To allow more flexibility by adopting other standards in addition to the quoted BS standards.

List-	LPC	BS	Context	Alternative	Reason
Item	Clause/Paragraph/	Clause/Paragraph/			
	Table/Page	Table/Page			
3.18	-	Clause 29.1	"the agreement should preferably	"the agreement should preferably	To allow more flexibility.
		Para. 2	include a requirement that an engineer	include a requirement that an appointed	
		(Page 43)	should be on call at all times,"	person should be on call at all times,"	

List Four : Clauses to be taken as reference only

List-	LPC	BS	Context	Reason
Item	Clause/Paragraph/ Table/Page	Clause/Paragraph/ Table/Page		
4.1	Forward Para. 1, 2, 3 and 4 (Page 1)	-	"These Rules enable Insurers to apply their own special requirements along with those of the British Standard with the appropriate clause number together with a suffix letter so as not to be confused with the text of the British Standard."	These Paras. are not part of the contents of the LPC and BS Standards.
4.2	Clause 3(a) (Page 2)	-	"All parts of premises shall be protected. In general, installed systems shall be type P1 systems (installed throughout the protected building) in accordance with the standard. However, at the discretion of the insurer, protection may be relaxed in areas fully protected by an automatic sprinkler system installed in accordance with LPC Rules for automatic sprinkler installations. Such protection would be a Type P2 system (installed only in defined parts of the protected building)."	Exact requirements have been stipulated in the FSCoP.
4.3	Clause 3(b) (Page 2)	-	"The installation shall also be classified in accordance with the anticipated attendance time of the fire Brigade*: Class A – 5 minutes or less Class B – 10 minutes or less Class C – 15 minutes or less , may be acceptable at the discretion of the insurer."	The present fire services requirements have no such classification.
4.4	Clause 3(c) (Page 2)	-	"If the Fire Brigade attendance time is much longer than 15 minutes, then, in many cases, a fire detection installation as a sole automatic fire protection measure may be inappropriate. In such cases, automatic sprinkler, gaseous or other forms of extinguishing systems may be required. Acceptance of such arrangements would be at the discretion of the insurer."	The FSCoP has no such mandatory requirements.
4.5	Clause 3(d) (Page 2)	-	"In the case of multiple occupancy premises, the responsibility for the building and the fire protection system(s) shall be identified (see BS Clause 2.13 and 28.1). Any restrictions on coverage shall be pointed out to the insurer at an early stage."	The Fire Services Ordinance has already identified the responsibility of the Owner / Incorporated Owner.
4.6	-	Clause 3.1 (Page 3)	"Fire alarm systems may be installed in buildings in order to satisfy several different needs. They may be, the number of sounders used will have to be sufficient to give warning throughout the building."	The present fire services requirements have no such classification of type P1, P2, L1, L2, L3 and M systems.

List-	LPC	BS	Context	Reason
Item	Clause/Paragraph/ Table/Page	Clause/Paragraph/ Table/Page		
4.7	-	Clause 3.2 (Page 4)	partial cover system is a type P2 system."	requirements have no such classification of type P system.
4.8	-	Clause 3.3 (Page 4)	"In some buildings the hazard to life from fire may be considered so small that no fire alarm is needed of a type M system depends critically on the presence of people to detect the fire, and on the training they are given in the procedures to be followed if a fire occurs."	The present fire services requirements have no such classification of type L and M systems.
4.9	-		"In large private dwellings, for example a country mansion, the protection will usually need to be of types L and/or P,, particular where some parts such as wiring might be concealed once the system is installed."	Exact requirements have been stipulated in the FSCoP.
4.10	-		"Buildings in multiple occupation may be buildings occupied by more than one commercial undertaking, Cooperation and liaison between occupants will then be needed."	Exact requirements have been stipulated in the FSCoP.
4.11	-	Clause 3.6 (Page 5)	"Because of wide range of systems covered by the recommendations of this Part of BS 5839, it should be, the type or types of protection required in each part of the building should be identifiable from the specification."	Each designer shall be responsible for drafting his own specification for meeting the requirements as stipulated in the FSCoP.
4.12	-	Clause 4.1 – 4.4 (Page 5)	"4.1 General The system requirements, including those imposed by the configuration and usage of the premises,, since the interactions with other occupancies may significantly affect the design of the system."	Not mandatory requirements.
4.13	Clause 5(a) (Page 2)	-	"Planning schedules shall be in accordance with BS Clause No. 5."	Not mandatory requirements.
4.14	-		"A typical list of events to be taken into consideration in preparing a planning schedule is as follows,	Not mandatory requirements.
4.15	Clause 6(b) (Page 2)	-	"In order to determine the most appropriate and effective system for the given conditions, a risk assessment of the premises to be protected shall be carried out. The insurer and other interested parties shall be consulted at this stage	Not mandatory requirements.

List-	LPC	BS	Context	Reason
Item	Clause/Paragraph/ Table/Page	Clause/Paragraph/ Table/Page		
4.16	Clause 6(c) (Page 3)	-	"The results of the assessment will determine the most appropriate type of system and extent of installation. For example: (i)(ii)(iii) and that automatic supression should also be used."	Not mandatory requirements.
4.17	-	Clause 6.2 Para. 4 (Page 7)	"In some premises the probable rate of spread of fire may be so high that, or packaging are stacked to a height exceeding 5 m."	Exact requirements have been stipulated in the FSCoP.
4.18	-	Clause 6.3 Para. 4 (Page 7)	"In premises in which normally active occupants can be expected to react to an emergency in a rational manner, provide an acceptable level of protection, a type L3 system may suffice."	Exact requirements have been stipulated in the FSCoP.
4.19	-	Clause 6.3 Para. 6 (Page 7)	"In residential premises, where a greater than normal time is required to evacuate the building,	Exact requirements have been stipulated in the FSCoP.
4.20	-	Clause 6.6.1 Para. 5 (Page 8)	"Even where the wiring of a system is monitored,, but the call point used should be one remote from the control equipment so that all the wiring of the circuit is tested. NOTE, In some systems the connections to call points are such that operation of a call point will not fully test the cables feeding detectors."	This requirement is considered an additional requirement to the current practice and is not a mandatory requirement.
4.21		Clause 6.6.2 Para. 3 (Page 8)	"During the design stage, consideration should be given to the possibility of malicious removal of detectors, detectors of a type that can be removed only by the use of a special tool should be used. NOTE. A special tool in this context is a tool not likely to be carried by a member of the general public since various articles can be used as ordinary screwdrivers."	Using a special tool to remove detectors is not common local practice and it would be difficult to implement this requirement.
4.22	-	Clause 7.1 (Page 11)	"In most buildings an alarm of fire may initiate a number of different activities, e.g. the provision of assistance,, it is thus important that in such systems the concepts of 'zones' and 'circuits' be treated separately."	This Clause dealt only with general design consideration and it should provide flexibility to designer.
4.23	-	Clause 7.2 Para. 2 (Page 12)	"Where a special fire risk is present within a larger protected area, and it is considered important to obtain rapid identification of a fire in that risk, the risk should be considered as a separate zone."	Not mandatory requirements.
4.24	-	Clause 9.3 Para. 2 (Page 13)	"Sounders should be suitably distributed throughout the building having regard to the attenuation of sound caused by walls, in order to prevent excessive sound levels in some areas."	Not mandatory requirements.

List-	LPC	BS	Context	Reason
Item	Clause/Paragraph/	Clause/Paragraph/		
4.25	Table/Page	Table/PageClause 10.2	"It may be necessary to have travel distances to a call point much less than 30 m	Not mandatory requirements.
4.23	-	Para. 1	where	not manuatory requirements.
			necessary."	
4.26	-	Clause 12.1	"Such a system. giving total coverage for property protection, is a type P1 system.	The present fire services
		Para. 2, 3 and 4	In order to prevent such spread, areas protected by a type P2 system	requirements have no such
		(Page 20)	should therefore be separated from unprotected areas by fire-resisting	classification of type P1 and P2
			construction."	systems.
4.27	-	Clause 12.2.7	", and the detector manufacturer may be able to supply a cover to prevent direct	The application of this type of
		(Page 21)	entry of smoke from below without inhibiting normal entry from the side at	cover is very limited.
			ceiling height."	
4.28	-	Clause 12.2.14	"A detector should be sited in any lantern-light used for ventilation or having a	Not mandatory requirements.
		(Page 22)	height above the ceiling greater than 800 mm, and should be	
			protected from direct sunlight."	
4.29	-	Clause 12.2.15	"As the plume from a fire rises, it draws in air from round about it	Not mandatory requirements.
			and even in the presence of stratification smoke detectors are likely to operate	
			before heat detectors."	
4.30	-	Clause 12.4.2	"Where the air from several extract points is combined into one duct	Installation requirements of
		Para. 3	To avoid this further reduction it may be necessary to install a smoke detector	smoke detector inside ventilation
		(Page 23)	near each of the extract points."	duct is regarded as ventilation/ air
				conditioning control system
				which shall follow those
				requirements as stipulated in
				FSCoP.
4.31	-	Clause 13.2	"13.2.1 <i>General</i> . In circumstances where a particularly early warning of fire is	The provisions and requirements
		(Page 24)	necessary for the safety of life, automatic fire detectors should be installed.	of automatic fire detection system
			detection in all parts of the premises. Such a system is a type L1 system, and	FSCoP and HKFSD has not
			gives the maximum degree of improvement in safety that can be achieved by a	classified the level of protection
4.22			fire detection system."	as type L1, L2 and L3 systems.
4.32	-	Clause 13.5	"13.5.1 <i>General</i> . A type L3 system should be so designed that in any fire an	The present fire services
			alarm is given, or by an optical beam detector with a vertical	requirements have no such
			beam.	classification of type L3 system.
			Detectors may be necessary in dormitories (see 13.6.3)."	

List- Item	LPC Clause/Paragraph/ Table/Page	BS Clause/Paragraph/ Table/Page	Context	Reason
4.33	-	Clause 13.6 (Page 25)	"13.6.1 <i>Escape routes</i> . In general, the most vulnerable areas in any building are the circulation areas, since once	The present fire services requirements have no such classification of type L2 system.
4.34	-	Clause 13.7 (Page 26)	"Where a total cover system is installed, detectors should be sited in all areas of the building, either heat or smoke detectors may be installed."	The present fire services requirements have no such classification of type L1 system.
4.35	-	Clause 15.3.5 (Page 29)	"If the system uses automatic detectors, then the area in which the control unit is sited should be covered by the detection system."	Not mandatory requirements.
4.36	-	Clause 16.3.2.2 (Page 31)	"In some premises, in addition to supplies taken from the public mains, unless a supply is connected from some other source (such as a portable generator brought in for the purpose)."	Not practical to implement.
4.37	-	Clause 16.7.2 (Page 32)	"If the system uses automatic detectors then the areas in which the equipment is sited should be covered by the detection system."	Not mandatory requirements.
4.38	-	Clause 18.1 – 18.4 (Page 36)	"18.1 General 18.1.1 <i>Radio links</i> . Some alarm systems are available in which some or all of the interconnections between components are made by radio links 18.4.3 <i>Cabling</i> . Where cables are used in the system, for instance for power supplies or to take signals to remote aerials, they should comply with the recommendations of clause 17."	Radio-linked systems are not applicable locally.
4.39	-	Clause 21 (Page 38)	"21.1 Verification Arrangements may be specified in the contract for pre-delivery inspection of the equipment, other hazardous materials should be clearly labelled to emphasize the risk of damage during transportation or storage on site."	Not mandatory requirements.
4.40	-	Clause 22 (Page 38)	"The work on site should consist of the following : 	All the sequences and scope of works should be determined by the designer, consultant or contractors.
4.41	-	Clause 26.1 Para. 2 (Page 40)	"The installer should supply the user with a log book and a certificate of installation and commissioning (see 28.2.2 and appendices B and D)."	Not mandatory requirements.

List-	LPC	BS	Context	Reason
Item	Clause/Paragraph/ Table/Page	Clause/Paragraph/ Table/Page		
4.42	-	Clause 26.5 Para. 1(d) (Page 40)	"any radio links have adequate signal strength (see 18.4);"	Radio-linked systems are not applicable locally.
4.43	-	Clause 26.7 (Page 41)	"26.7.1 <i>Normal handover</i> . When commissioning and certification are complete, the system should be formally handed over to the user	All the handover requirements, procedures and arrangements are not mandatory requirements and should be separately arranged among the designer, installer, owner and occupier.
4.44	-	Clause 26.8 (Page 41)	"In large or complex systems it may be desirable that an operational audit is made, the logging of events and the efficiency of maintenance."	Not mandatory requirements.
4.45	Clause 28(a) (Page 5)	-	"The user shall be made aware of his responsibilities, as indicated in BS Clause 2.13 and BS Clause 28."	Not mandatory requirements.
4.46	Clause 28(b) (Page 5)	-	"The log book described in BS Clause 28.2.2, shall be available for inspection by the insurers."	Not mandatory requirements.
4.47	-	Clause 28.1 – 28.4 (Page 42)	"28.1 Supervision 28.1.1 <i>Responsible person</i> . The owner or other person having control of the premises should appoint a responsible person to supervise the system. 	Not mandatory requirements.
4.48	Clause 29(c) (Page 5)	-	"In addition to the above, the installer shall specify any special maintenance procedures necessary	Not mandatory requirements.
4.49	Appendix A	-	"APPENDIX A EXAMPLE OF A COMPLETION CERTIFICATE FOR AUTOMATIC FIRE DETECTION AND ALARM INSTALLATIONS	This form is not a statutory prescribed form.
			Note : It is the responsibility of the insured to notify the Insurers immediately of any disconnections or failure likely to leave the installation or part of the installation unprotected for 12 hours or more."	

List- Item	LPC Clause/Paragraph/	BS Clause/Paragraph/	Context	Reason
Item	Table/Page	Table/Page		
4.50	-	Appendix A (Page 47)	"A.1 General There are several methods by which alarms of fire can be transmitted automatically, since at busy periods there may be considerable delays in answering it."	Not mandatory requirements.
4.51	-	Appendix B (Page 48)	"Appendix B. Model certificate of installation and commissioning of a fire alarm system The system documentation is situated"	Not mandatory requirements.
4.52	-	Appendix C (Page 49)	"Appendix C. Model certificate of testing of a fire alarm system For and on behalf of (user or service organization)"	This form is additional to the statutory required prescribed form e.g. FSI 251 and its content can be agreed between the user and the registered fire service installation contractor.
4.53	-	Appendix D (Page 50)	"Appendix D. Model log book for fire alarm systems D.1 General The data to be recorded in the log book falls into the following D.3 Model log book Expendable component replacement due (list):"	The requirements, format, layout and content of this log book can be agreed between the user and the registered fire service installation contractor.
4.54	-	Appendix F (Page 52)	"F.1 General Although this Part of BS 5839 does not cover fire alarm systems integrated with systems for other purposes, F.16 Isolation This fire alarm system should not be adversely affected by provisions made for the isolation of other parts of the system."	Not mandatory requirements.
4.55	-	Appendix G (Page 53)	"G.1 General This appendix covers the functional recommendations for single zone control equipment for small manual systems;	Not mandatory requirements.

List-	LPC	BS	Context	Reason
Item	Clause/Paragraph/	Clause/Paragraph/		
	Table/Page	Table/Page		
4.56	-	Appendix H	"This appendix consists of the text of booklet FB2 'Smoke Alarms in the Home',	Not mandatory requirements.
		(Page 55)	1988,	
			the Home available."	
4.57	-	Appendix J	"J.1 General	Not mandatory requirements.
		(Page 61)	Most of the recommendations of this Part of BS 5839 are relevant to all types of	
			system.	
			(2) audible and visual alarms : see 9.1."	
4.58	-	Appendix K	"K.1 Staged alarms and phased evacuation	Not mandatory requirements.
		(Page 61)	In the past, the terms 'staged alarms' and 'phased evacuation'(particularly 'two-	
			stage alarm' and 'two-phase evacuation') might be	
			acceptable in return for a reduction in the inconvenience due to an unduly high	
			frequency of false alarms (see 14.6)."	

Annex

Annex

Table 2 : Spacing and siting of detectors on honeycomb, waffle and similar ceilings(for BS Clause 12.2.3)

Ceiling height to structural slab, H	Beam depth, D (to nearest whole metre)	Maximum distance between any point and the nearest smoke (heat) detector	Detector location if $W \le 4D$	Detector location if $W > 4D$
(to nearest whole metre)				
≤ 6	< 10% H	As per flat ceilings	Underside of beams	On structural slab
> 6	< 10% H	As per flat ceilings	Underside of beams	On structural slab
	and \leq 600mm			
> 6	< 10% H	As per flat ceilings	Underside of beams [*]	On structural slab
	and > 600 mm			
3	> 10% H	4.5m (3m)	Underside of beams	On structural slab
4	> 10% H	5.5m (4m)	Underside of beams	On structural slab
5	> 10% H	6m (4.5m)	Underside of beams	On structural slab
≥ 6	> 10% H	6.5m (5m)	Underside of beams	On structural slab

W = Width of cell

D = Depth of beams that form each cell

*

Since mounting detectors at a depth of more than 600mm below the highest point in the protected spaces does not comply with the requirements as stated in Para. 1 of BS Clause 12.2.3, protection in these circumstances may need careful consideration to determine the most suitable location and spacing of detectors.