

Brief Notes of Liaison Meeting between FSD and Authorized Persons

Date : 22 August 2018 (Wednesday)
Time : 1500 hours
Venue : Conference Room, Fire Safety Command, FSD

Matters Discussed in the Meeting :

1. **Registered Fire Engineer (RFE) Scheme**

The first draft Code of Practice (CoP) for RFE was recently completed. A holistic assessment on the provisions of the CoP and the Fire Services (RFE) Regulation was being made to ascertain if the provisions were in concert with and comprehensive enough to serve the purpose of regulating the performance of RFEs.

2. **Creation of the new Airport Expansion Project Division**

A new dedicated Division named Airport Expansion Project (AEP) Division was formed on 6.8.2018. The new Division would be responsible for the processing of the statutory submissions, Fire Engineering Reports, consultations related to the Three Runway System and airport related projects of the Hong Kong International Airport.

3. **Relocation of the New Projects & Airport Expansion Project Divisions**

The offices of the AEP Division had been moved from Fire Services Headquarters Building (FSHQ) to 2/F, Centre Parc, 11 Sheung Yuet Road, Kowloon Bay on 13.8.2018 whilst the New Projects Division had been moved to the same location on 20.8.2018. The telephone numbers would be changed and updated in the relevant correspondences in due course whereas the email addresses of our officers remained unchanged. The removal notification had been sent to the related parties and other stakeholders by email.

Changes in arrangement for the collection of FS Certificate FS161 and processed General Building Plans (GBP) would be as follows:

- (i) Arrangement for certificate (FS161) collection at 5/F of FSHQ

- would remain the same;
- (ii) Processed GBPs with certificate (FS161) issued would be collected at FS Command HQ on 7/F of FSHQ; and
 - (iii) Processed GBPs without certificate issued would be collected at the relocated AEP and NP new offices in Kowloon Bay.

As for the relocation of FSID office to Kowloon Bay on 27.9.2018, the changes in arrangement for the FS 172, FSI/501 and FSI/314 processed by the FSI Division would be as follows:

- (i) Arrangement for certificate (FS172) collection at 5/F of FSHQ would remain the same; and
- (ii) FSI/501 and FSI/314 would be submitted to the FSI Division new office in Kowloon Bay.

4. ***Enquiries relating to Fire Service Installation (FSI) Inspections***

Undertaking of AP for lining

Member asked for clarification on the arrangement of requiring APs to confirm whether linings were installed during FSI inspections.

Linings for acoustic insulation, thermal insulation and decorative purposes were not classified as fire service installations and equipment in accordance with the Code of Practice for Minimum Fire Service Installations and Equipment (FSCoP). Instead, it should only be the additional requirements in Part 4 of the FSCoP. Since the materials used for linings of thermal insulation, acoustics and decorative purposes were not under the purview of the FSI Division, the APs would only be requested to confirm all relevant linings to be code compliant by providing written declaration.

Removal of scaffolding before compliance inspection

Member asked if there could be a relaxation of the current requirement that scaffolding had to be removed before compliance inspection, as long as such arrangement would not affect the smooth proceeding of FSI inspection.

The proposal of allowing scaffolding in place during the compliance inspection would not be supported because-

- (i) From fire rescue point of view, the existence of scaffolding would

- incur uncertainties to fire intervention and rescue; and
- (ii) It was explicitly confirmed by the AP and RFSIC in the form FSI/501 that the works were substantially completed and the site was ready for inspection. This implied that scaffolding would no longer be required for any further site works. In normal operation, the scaffolding should not be required to facilitate compliance inspections unless the submission of form FSI/501 was a premature one.

The Chairman expressed his concern about the quality of work in various construction projects and reiterated the importance of ensuring certified materials used in building works.

5. **Clarification on Fire Fighting and Rescue Stairway (FRS)**

In response to the enquiry from a member regarding the pressurization requirement for FRS, it was told that the “pressurization of staircase” would be required for basements of three or more levels in accordance with Clause 4.4(x) of CoP for Minimum Fire Service Installations and Equipment (FSI Code), whereas FRS was Buildings Department’s requirement in accordance with the CoP for Fire Safety in Buildings 2011 (FS Code). The two requirements should be fulfilled independently.

For example, for a 2-level basement exceeding a depth of 9 m, one FRS was required within 60 m of any part of the floor in accordance with Table D1 of the FS Code. Since pressurization of staircase was not required for basements of two levels in accordance with Clause 4.4(x) of FSI Code, the FRS could be designed either with pressurization or with natural ventilation in accordance with Clause D19.1 of FS Code.

6. **Interpretation on Fire Safety Code**

A member would like to know when it came to problems with the interpretation of the FS code issued by BD, whether the final say of some particular issues rested with FSD and if it would be possible to provide a list of those issues with final say rested with FSD for reference.

The requirements of means of escape, fire resisting construction, means of access and fire safety management as stated in the CoP for Fire Safety in Buildings 2011 (FS Code) were under the jurisdiction of the Buildings Department in accordance with the Buildings Ordinance, Cap. 123. However, FSD would provide comments on the above-mentioned items from fire safety and operational point of view during plan processing from time to time

In case fire engineering approach was adopted as an alternative to the prescriptive requirements of the above-mentioned items to meet the fire safety objectives and performance requirements of FS Code, the proposal had to be submitted to and endorsed by the Fire Safety Committee (FSC) appointed by the Director of Buildings, in which an officer nominated by FSD would be one of the appointed members of FSC. Every case referred to the FSC would be assessed in a case-by-case basis and it was not feasible to list out all issues of concerns. FSD was also considered not in an appropriate position to set a standard procedure for processing cases under the FSC's jurisdiction.

7. **Professional Requirements on GBP Submission and Application for Compliance Inspection of FSI**

After the seminar for the building industries held on 24 November 2017 and several technical seminars organized for the trade, it was pleased to note that the quality of GBP submissions had been significantly improved.

Nevertheless, the following examples of some repeated irregularities could still be commonly found in GBP submissions-

(i) **Missing of international standards of FSIs in FS Notes**

Processing time would be lengthened since GBP amendment would be required, or, more time would be required for clarification during acceptance inspection.

(ii) **FS Notes not tallied with layout plans**

Locations of major system components as mentioned in FS notes could not be found on plans. Processing time would be lengthened and subsequent GBP amendment would be required.

(iii) FS Notes not tallied with existing building FSI in A&A works submission

A & A works involving material change in use did not clearly or explicitly colored/shown/delineated on plans. The overall FSI requirements could not be timely determined and suitable fire safety advices could not be timely provided. Processing time would be lengthened and eventually disapproval of GBP might be resulted.

Existing FSIs provided in the building were not accurately described in FS Notes. To enhance the plan processing efficiency, APs should check the existing FSIs provided to the existing building and proposed adequate FSIs for the A & A works involved.

(iv) Amendments made in previous submissions not incorporated in the latest submission

Processing time would be lengthened since GBP amendment would be required. The APs might not be aware of the amendment as the old version of FS Note would not be colored for attention.

In addition, common irregularities found in acceptance inspection / functional test were listed out as follows-

- (i) Electricity power supply for FSIs was unavailable;
- (ii) Water for water-based FSIs was unavailable;
- (iii) Incomplete installation of FSIs;
- (iv) Numerous defects of FSIs;
- (v) Incomplete building works; and
- (vi) Temporary structures causing blockage of FSIs.

Analysis on the duration required for acceptance inspections was conducted and it was revealed that on average 54 calendar days were required from the receipt of FSI/501 application to the completion of the acceptance inspection in case of no re-inspection. In addition, the average duration required for the application with the need of re-inspection was 144.5 calendar days and most of the time was spent on defects rectification as well as the repeated re-inspections. It was concluded that improvement on acceptance inspection process would

require more effort from the private practices. FSD further reminded the trade to look into the quality of the FS related works and the site readiness to shorten the duration required for acceptance inspections. The Chairman welcomed further comments or recommendations on this issue.

8. **Judicial Review (JR) Case on Mini-storage Premises**

A member asked if the recent lodging of JR application by some mini stores unions would affect the mini stores owners who were undergoing improvement works or application of new mini-stores.

No specific comment in relation to the JR could be offered at the present stage as the FSD had not yet received any formal notification of the Leave to Apply for Judicial Review. FSD would handle the case in accordance with the existing mechanism when served with the order granting leave.

The Chairman reiterated the importance of enforcement work in abating the identified fire hazards in the mini-storage premises from the perspective of public safety.

9. **Wholesale Conversion of Industrial Buildings (IB)**

In response to the enquiry from a member regarding the wholesale conversion of IB to domestic building, it was told that FSD would in principle accept wholesale conversion of an industrial building to a domestic building subject to the provision of emergency vehicular access, water supplies for fire fighting and FSI conforming to the current standard. Having considered the much higher potential risk of fire and accident in IBs arising from the modus operandi of industrial undertakings, domestic use in IBs was considered unacceptable from fire safety point of view.

The Chairman supplemented that the Government was exploring viable means which could create substantial incentive for revitalization of IBs.

10. **Fire Rated Duct from Internal Bathroom**

A member asked whether fire damper would still be required for internal bathroom if fire rated duct was installed.

Proper fire compartmentation should be maintained for the internal bathroom by using fire damper or fire rated duct as appropriate. For the use of fire damper, the owner should employ registered ventilation contractor to inspect and certify the fire damper annually.

11. **Issues related to the processing of FSI/ 314**

Enhanced procedures and measures for acceptance inspection were fully implemented and the effectiveness of such measures was reported in the seminar on 25.6.2018. In order to further enhance the transparency of the vetting on FSI/314 for smoke control systems, it was proposed that FSID would copy comments arising from drawings vetting to the AP or owner of the project for their information if they could provide a duly signed consent form with relevant contact information to FSID under the cover of FSI/314 submission. Upon no adverse comment received for the proposal, the proposal would be implemented shortly.

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