Brief Notes of Liaison Meeting between Fire Services Department (FSD) and the Authorized Persons (APs)

Date : 22 May 2025 (Thursday)
Time : 1500 hours

*Video conference was conducted

Matters Discussed in the Meeting:

1. ***General Building Plan (GBP) Submission and FSI Acceptance Inspection***

Performance Indicators

The performance indicator figures for GBP processing and FSI acceptance inspection conducted by FSD were presented.

Repeated Irregularities Found in GBP Submission/ during Acceptance Inspection

The following repeated irregularities were noted in recent GBP submissions and acceptance inspections:

(i) Amendments made in previous submissions were not incorporated in the latest submission;
(ii) Alterations and additions (A&A) area/submission areas were not clearly delineated/colored on plans; and
(iii) FS Notes amendments were not highlighted/underlined.

The irregularities mentioned in previous meetings had been incorporated into the latest version of "Supplementary Guidance Note on General Building Plan Submissions" which would be uploaded to FSD website in mid-2025.

2. ***Car Parking Facilities with Automated Parking System (APS)***

Comments from all stakeholders had been received and considered. A circular letter promulgating the fire safety requirements for CPF with APS would be issued in Q2 2025 tentatively.

3. ***Electronic Issuance of Fire Services Certificate (F.S.172)***

As at 30.4.2025, 50 nos. of F.S.172 (76% of total) and 4 nos. of acceptance memo (36% of total) were issued by email via e-Issuance System (e-IS). APs, government officers and Registered Fire Service Installation Contractors (RFSICs) were encouraged to provide an email address when they submit application for FSI acceptance inspection to benefit from the convenience of e-issuance of F.S.172 or acceptance memos.

A powerpoint presentation introducing the e-services was circulated to the members via email on 13.5.2025. In addition, a draft one-page brief was prepared and distributed to the members for comments. Once comments were received, the brief would be used to promote and facilitate the use of the e-service. Besides, e-correspondence (e.g. Letter of Duties of owner and Letter to Owner on incompletion of DTL) along with e-F.S.172 as well as e-memo and e-acceptance letter would be issued to applicants via e-IS in Q2 2025 tentatively.

4. ***Streamlining Application Procedures for Exemption of Sprinkler Installation underneath Canopy or in Inaccessible Voids***

The standard forms for applying Exemption of Sprinkler Installation underneath Canopy or in Inaccessible Voids were made available in the "Downloadable Forms" of the FSD's website as of 30.12.2024. Members of the trade were encouraged to utilize these forms when applying for such exemptions. Comments provided by members of this meeting were appreciated and the relevant responses-to-comments were given to stakeholders concerned in February 2025 accordingly.

5. ***Enhancement Measures on FSI Acceptance Inspection for New Building Projects***

Establishment of One-stop Coordination Office for New Fire Protection Facilities Acceptance (OFFA)

OFFA was officially established on 13.3.2025. A press conference introducing the establishment of OFFA was held on 30.4.2025. OFFA was committed to providing one-stop support and co-ordination services with a facilitator mindset to enhance the overall efficiency of FSI acceptance inspections. Through a series of enhancement measures, it was aimed at shortening the overall time required for acceptance inspections of average-scale regular projects by one-third, from 52 working days to within 35 working days, and further reducing the acceptance process for public housing projects to 22 working days.

Dedicated Thematic Website for OFFA

A dedicated thematic website was set up for OFFA on 8.4.2025. The website incorporated all crucial information to facilitate the understanding of practitioners and stakeholders on details of the FSI acceptance inspection.

FSD Mobile App New Searching Function

The FSD Mobile App's new searching function for FSI/501 application status was put in use on 8.4.2025. Applicants could check their FSI/501 application status via the FSD Mobile App.

6. ***Streamlining the Processing Time of Final Plans Submission for Smoke Control Systems (SCSs)***

With a view to facilitating the trade in SCS FSI plans submission (including smoke extraction systems, staircase pressurization system and ventilation/air-conditioning control (V/AC) system), FSD had proposed to streamline the processing time for final plans submission as follows:

(i) Submission of SCS FSI plans based on the latest set of approved GBP which was for FSI Acceptance Inspection

- When submitting Form FSI/314 for SCS, the AP shall include a covering letter explicitly stating that the submission was based on the latest set of approved GBP and was intended for "FSI Acceptance Inspection".

- The processing time of this type of submission would be reduced from normally not more than 12 weeks to normally not more than 8 weeks.
- To prevent abuse of this measure, the reduced processing time would be granted only once for each system of the building.

(ii) <u>FSI Acceptance Inspection based on stamped SCS FSI plans according to the previously approved GBP</u>

- The AP and Registered Professional Engineer (RPE), where applicable, should submit a declaration letter along with FSI/501 application, undertaking that any minor changes (e.g. duct routing or equipment relocation) did not affect the system's design and performance. This declaration letter should be accompanied with a summary and part plans, indicating the changes.
- The AP, RFSIC and RPE, where applicable, subject to the approval from the NP Division, would be notified to make minor amendments on the stamped FSI plans and the corresponding Form FSI/314 for SCS at the later stage of FSI acceptance inspection.
- Re-submission of Form FSI/314 and FSI plans for SCS to the NP Division were required for any changes involving system design, including but not limited to the following principles:
  - Addition of system - any systems that had not been included in the stamped FSI plans and/or had not been submitted previously
  - New alternative proposal - any proposals that did not comply with the prescriptive requirements, e.g. smoke extraction rates based on a fire engineering approach instead of prescriptive requirements
  - New system design - any changes to system designs, e.g. modifications to the V/AC control method or alterations to the class of the staircase pressurization system.

In case of doubt on the above principles, the NP Division should be consulted.

A "Points to Note" document would accompany the first approved GBP/SCS plans to guide applicants on these measures, with implementation tentatively set for June 2025. A session of FSD Connects with the Industries would be held in due course and members were invited to contact FSD should there be any enquiries.

7. ***Enquiries Regarding Final Amendment Submission***

Once an FSI acceptance inspection application was received, should the AP require minor amendments to the GBP, OFFA inspecting officers would invite the NP Division responsible officer to attend the pre-inspection meeting, who would advise whether the requested amendments were minor and approvable. The OFFA officer would conduct the inspection based on the latest approved GBP. Such minor amendments would be made after the on-site inspection.

The issue had been addressed by the electronic submission hub (ESH). If GBP had been stamped by the NP Division via ESH and amendments were required afterwards, the NP Division would assess the approvability of the amendments during the pre-inspection meeting. Once the amendments were deemed approvable, they may re-open the "discussion forum" for AP to amend the GBP through the electronic platform.

8. ***Removal of Scaffolding before FSI Acceptance Inspection***

Following OFFA's establishment, a comprehensive review of the FSI acceptance inspection had been conducted. The existing proposal for the removal of scaffolding discussed in the August 2018 meeting that scaffolding had to be removed before acceptance inspection was revisited to facilitate the trade for better planning of construction sequence under specific conditions. Although the existence of scaffolding was not encouraged at the time of acceptance inspection, provided that the scaffolding posed no safety risks to inspecting officers of FSD and did not hinder the acceptance inspection, the erection of scaffolding was considered acceptable under the following conditions:

(i) Scaffolding on external walls where no FSI was present;
(ii) Scaffolding inside the premises that did not obstruct the visual inspection or functional tests of the FSI;
(iii) Scaffolding at designated locations agreed upon during the pre-inspection meeting, purposely erected to assist the acceptance inspection, i.e. conduct measurement at high level; or
(iv) Metal scaffolding or fixed platforms that did not interfere the visual inspection or functional tests of the installations.

When the aforementioned conditions were met, the AP should inform the case officer during the pre-inspection meeting and, if possible, provide

photographs of the site conditions to outline the arrangements. Upon receiving the information, FSD would conduct the site inspection accordingly.

In response to a members' enquiry on the erection of hoarding on site during acceptance inspection, the key consideration was whether the FSI was accessible and complied with the siting requirement stipulated in FSI Code of Practice. If the hoarding did not obstruct the inspection of FSIs such as fire service inlet or street fire hydrant etc., the inspection could be proceeded. As for EVA, it should allow safe and unobstructed access and safe operation of FSD vehicles in accordance with Code of Practice for Fire Safety in Buildings 2011. Hoarding or gantry that were yet to be dismantled or removed should not violate the above principle. The location of hoardings could be reported to inspection officers at pre-inspection meetings.

9. ***FSD's Views and Interpretation on Means of Escape (MOE) under BD's Fire Safety Code 2011 (2024 Edition) and Fire Services (Fire Hazard Abatement) Regulation (FS(FHA)R)***

In response to a member's enquiry on a few recent cases of completed residential projects which FSD had served Fire Hazard Abatement Notices (FHANs) to building managers/concerned flat owners under the FS(FHA)R requesting locks installed for doors giving access from common staircases to private roofs be removed, claiming that such access from the common escape staircase to the roof was an MOE, even though the roof had not been designed to act as an ultimate place of safety or any temporary refuge area, nor designed to cope with the requirements stated in the Fire Safety Code (the Code), it was explained that all MOE, including roof exits, the locks thereat must be readily and conveniently be opened without the use of a key in the event of a fire or other calamity.

With reference to the definition of fire hazard under s.2 of Fire Services Ordinance, Cap. 95, FSD's operational experience and fire-fighting point of view, the roof of a building would be used as a temporary place of safety by both the occupiers and even unhabitual visitors, e.g. delivery personnel, etc. in the event of a fire. Locking of roof exit doors would therefore be deemed as depriving or diminishing their chance of evacuation and thus be regarded as a fire hazard. According to FS(FHA)R, a FHAN may be issued against the owner of the roof if such fire hazard existed, requiring the owner to abate the fire hazard by (i) keeping the exit door of the affected roof unlocked within a specified period of time; and (ii) subsequently

completely removing the locking device(s) or alternatively modifying the locking device(s) so that the door(s) could readily and conveniently be opened from within the premises (the staircase of the building leading to the roof) without the use of any key.

It was pointed out that there had been preceding court cases in which responsible persons were convicted of locking a roof exit which was not classified as a means of escape by BD, contravening s.15 of FS(FHA)R. Keeping roof exit unlocked was necessary for the protection of lives in the event of a fire. On this premise, the issue of whether the roof exits could be locked depended not only on the building design as regulated by BD, but also FSD's fire-fighting experience and operational observation on human behaviors in the event of a fire. Members were appealed to convey the messages to the trade.

10. ***Installation of Electrically Locking Device (EM lock) to Exit Door in Common Area***

In response to a member's enquiry on the processing of cases involving installation of EM locks to exit doors in common areas, it was reported that installation of EM lock to exit door was permissible, provided the following conditions were met:

(i) Compliance with the Code

- EM locks must adhere to the requirements outlined in Clauses B13.2 of the Code, being capable of automatic release upon actuation of a fire alarm or power failure and local manual override (emergency breakglass unit) should be provided from the inside near the exit door.

(ii) Access to Fire Service Access Points (Fireman's Lift)

- Doors or gates at fire service access points must be readily openable from the inside without requiring a key, as stated in Clause D7.1 of the Code.
- Emergency breakglass units for manual door release must be installed on both sides of doors at fire service access points.

(iii) Unobstructed Access to Protected Exits

- From a firefighting perspective, every lobby to a fireman's lift should have direct access, without any obstruction and lockable door, to a protected exit in accordance with Clause D11.4 of the

Code.

Should there be a genuine need for deviations from these principles, FSD would consider such cases individually based on their specific circumstances.