

By post and by email at fsicop_np@hkfsd.gov.hk

30 November 2021

New Projects Division
Fire Safety Command
Fire Services Department
2/F Centre Parc
11 Sheung Yuet Road
Kowloon Bay

Dear Sir/Madam

**Views from The Hong Kong Institution of Engineers
Regarding the Codes of Practice for
Minimum Fire Service Installations and Equipment and
Inspection, Testing and Maintenance of Installations and Equipment
(April 2012 Version)**

On behalf of the Institution, I am pleased to present to you our views and suggestions as set out in the enclosure for your consideration on the captioned subject.

The Institution welcomes the opportunity to work with the Government and offer our expertise and experience on the area of concern if and when it is needed.

Thank you.

Yours faithfully



Davis WONG (Mr)
Director

Enc

CKH/DW/SS

Enclosure

**Views from The Hong Kong Institution of Engineers
Regarding the Codes of Practice for Minimum Fire Service
Installations and Equipment and Inspection, Testing and Maintenance of
Installations and Equipment (April 2012 Version)**

The Hong Kong Institution of Engineers (HKIE) is pleased to note that the Fire Services Department (FSD) has updated the content of the *Codes of Practice (CoP) for Minimum Fire Service Installations and Equipment and Inspection, Testing and Maintenance of Installations and Equipment (April 2012 Version)* to reflect current practice and to promote clarity, facilitating stakeholders' understanding and implementation of relevant practices. The HKIE would like to provide the following views and suggestions on the subject matter from the Building Services Engineering perspective for the FSD's consideration.

CoP for Minimum Fire Services Installation and Equipment

Item	14
Para	4.13
Page	23
Comments	<p>Concern arises in <i>Justifications from FSTIF (d)</i> as follows: <i>“According to Clauses 8.13 and 11.1.2.2 in EN12845:2003, the pipework in wet pipe installations subject to frost damage shall be maintained at temperature not less than 4°C”</i></p> <p>In line with the updated EN12845:2015, it is suggested that the relevant clause number should be adopted as follows:</p> <p><i>“According to Clauses 8.13 and <u>11.1.2.3 in EN12845:2015</u>, the pipework in wet pipe installations subject to frost damage shall be maintained at temperature not less than 4°C”</i></p>

Item	67
Para	5.23
Page	74 & 75
Proposed amendment	<p><i>“... (k) the horizontal distance between the perimeter of any smoke reservoir and the external wall of the building where windows, panels or external louvres functioning as smoke outlets are installed, does not exceed 30 metres and that one side of the reservoir shall abut the external wall...”</i></p>
Comments	<p>Elaboration on whether the top side (roof) would satisfy the condition <i>“that one side of the reservoir shall abut the external wall”</i> is recommended, considering that smoke vents are commonly placed at the roof.</p>

Item	68
Para	5.23
Page	75 & 76
Proposed amendment	“... (b) <i>The aggregate aerodynamic free area of the smoke discharge outlets is required to be not less than 2% of the floor area served by the system. Of this not less than half shall be operable by automatic actuating devices...</i> ”
Comments	Normally, information on aerodynamic area for smoke vents, louvres etc. are to be provided by the manufacturer from laboratory tests. However, it is suggested to consider the case of a permanent building opening adopted as smoke discharge outlet, where such information on aerodynamic area is not available.

Item	69
Para	5.23
Page	75 & 76
Proposed amendment	“... (k) <i>All discharges shall be provided with signs as described under paragraph (c) hereof except the wording shall be:— THIS OPENING IS A SMOKE DISCHARGE. DO NOT COVER OR OBSTRUCT 此乃排煙口 不得遮掩或阻塞 ...</i> ”
Comments	The word “ <i>DISHARGE</i> ” should read “ <u><i>DISCHARGE</i></u> ”. It is also noted that low level make-up is specified for dynamic smoke extraction system but not for static smoke extraction system.

Other Comments on Existing CoP for Minimum Fire Services Installation and Equipment

2. In addition to the above suggestions on the updates made by the FSD, the Institution would also like to offer our views on sections of the existing CoP where amendments are not proposed in this exercise for further review and consideration of the FSD.

3. Clauses 4.27(xiii)(b), 4.28(xiii)(b), 4.30(xii)(b) and 4.32(xiii)(b) stipulate that pressurisation of staircase is required where “*the aggregate area of openable windows of the rooms/units of the building does not exceed 6.25% of the floor area of these rooms/units calculated on a floor by floor basis.*” It is recommended that a definition of “rooms/units of the building” be provided for accurate calculation of the floor area. Furthermore, for mix use on a floor, such as food and beverage together with offices, the Department is suggested to clarify whether the floor area of those “rooms/units” with designed fire load unlikely exceeding 1135 MJ/m² should be taken into account.