

**By post and by fax at 2415 4425**

16 June 2015

Labour Department  
Occupational Safety and Health Branch  
Occupational Safety – Operations Division  
New Territories West Region  
8/F, Chinachem Tsuen Wan Plaza,  
457 Castle Peak Road, Tsuen Wan, N.T.

[Attn: Mr Li Yiu-man]

Dear Mr LI

**Views on Draft Guidance Notes for Air-conditioning Works**

Thank you for your letter of 22 May 2015 inviting the Institution for views on the captioned subject.

In response to your invitation, we are pleased to provide herewith our views and suggestions on the subject for your consideration.

Thank you for your attention.

Yours sincerely



Monica YUEN (Mrs)  
Chief Executive and Secretary

Enc

MY/WC

**Enclosure**

**Views from The Hong Kong Institution of Engineers  
on Draft Guidance Notes for Air-conditioning Works**

The Institution welcomes the initiatives of the Government in issuing *Safety Guidance Notes for Air-conditioning Works* (Guidance Notes) to the public. For the purpose of achieving wider awareness and better effect, we suggest the Government to identify and recognise major partners to take the lead in promoting and implementing the key safety actions as laid down in the Guidance Notes.

2. While we agree in general to the content of the draft Guidance Notes, it is suggested that the document may also cover additional areas such as competence of workers, working during adverse weather, and inspections to be conducted before and after typhoons etc.

3. We would like to provide further suggestions/ views with respect to various Sections of the draft Guidance Notes for consideration as follows: -

*1. Introduction*

To facilitate the risk assessment as mentioned in Section 1.3 to be effectively carried out, it is suggested that some templates of hazard assessment form or checklist may be included in the draft Guidance Notes for reference.

*2. Working at Height*

*2.1 Hazards*

We suggest that falling object hazards should be included in the Guidance Notes. Where scaffolds are erected adjacent to a road or pathway, some suitable barriers, fencings, coverings or toe-boards should be erected to envelop the scaffolds for the protection of persons or vehicular traffic against falling objects.

*2.2 Scaffolding safety*

Regarding the scaffolding safety, we suggest listing the various codes of practices for scaffolding currently issued by the Government for reference. The practices and requirements as mentioned in this Guidance Notes should be aligned with those in the other codes of practices.

Under Section 2.2.1, we suggest defining the party (parties) responsible for providing the suitable working platforms for use on scaffolds.

Under Section 2.2.2, we suggest that the criteria (e.g. qualifications and experiences) of the "*competent person*" and "*professional engineer*" should be specified. Also, the effective time for the scaffolding safety after each certification should be considered.

In regard to the 5<sup>th</sup> bullet of Section 2.2.2 for the certification "*by a professional engineer*", the cost involved could be a concern. However, it is suggested that further clarification should be made on the following:

- the time when the certification of the life-line is to be conducted
- whether the certification is only applicable to the anchorage for the life-line
- the effective period of the life-line once being certified and the frequency for the certification
- whether some types of life-line may be exempted from certification (e.g. life-line that complies with British Standards)

Also, the types of "*safety harnesses*" should be specified as "*full body safety harnesses*" (i.e. this comment is also applicable to Section 5 of the draft Guidance Notes, and that “安全吊帶” should be specified as “全身式安全帶” in “5. 工友須知” for the Chinese version of the draft Guidance Notes)

### 2.3 *Safe use of ladder*

In the 2<sup>nd</sup> bullet, it is suggested replacing the word "*liable*" to "*possible*" to read as "*If a person is possible to fall...*". It is also suggested specifying the party (e.g. contractor or worker) to be responsible for providing the ladder serving the purpose of providing safe access and egress.

### 3. *Electrical Safety*

Please consider mentioning that risk assessment should be done before conducting electrical works.

In the 6<sup>th</sup> bullet of Section 3.2, we suggest specifying the party (e.g. worker or the supervisor) responsible for conducting the inspection. Also, it is suggested listing the precautionary measures to be taken when working outdoor, in particular during rainy days or at locations with possibility of water dripping from the upper level.

### 4. *Safety and health issues in using refrigerants*

It is suggested that permit-to-work system can be considered. If flammable refrigerant is intended to be used, relevant ventilation system should be checked before execution of the works. The permit issuer must ensure that the air inside the workplace has reached a safe level and no hot works would be conducted nearby.

Under Section 4.2 “Usage”, it is also suggested clarifying the party responsible for conducting risk assessment and providing personal protective equipment and fire extinguishers.

5. *Notes to workers*

While we appreciate that there is a summary for notes to workers, we further suggest adding sections on notes to other parties such as the proprietor, contractor and employer.

7. *Enquiries*

It is suggested that “Complaints” be retitled as “Report of unsafe practices”.