

By post and by fax at 3187 4534

18 October 2013

Environmental Management Division
3/F, Hong Kong Productivity Council Building
78 Tat Chee Avenue
Kowloon

(Attn: Ms Lydia SZE, Senior Consultant)

Dear Ms SZE

Views on Task Force on External Lighting Stakeholders and the Public Engagement Exercise

Thank you for your email of 19 August 2013 to the Institution inviting us to put forth our views on the captioned subject.

We are pleased to provide herewith our views and suggestions on the subject for your consideration.

Thank you for your attention.

Yours sincerely



Ms Ivy NGAI
Senior Manager – Special Duties & Planning
The Hong Kong Institution of Engineers

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IN/WC

Enclosure

**Views from the Hong Kong Institution of Engineers on
Task Force on External Lighting
Stakeholders and the Public Engagement Exercise**

The Hong Kong Institution of Engineers (HKIE) supports the Administration's initiatives to address the public concern on light nuisance and energy wastage. We support the way forward proposed by the Task Force on External Lighting on the requirement to switch off external lighting of decorative, promotional or advertising purposes after the pre-set time.

2. We are of the opinion that the Administration should endeavour to reach the consensus among the stakeholders to address the issue and to implement by means of legislation to regulate external lighting. The Administration should have all stakeholders' concerns be fully addressed before its implementation.

3. It is suggested that measures for mitigating light nuisance and energy wastage problems might be included in the Buildings Ordinance and its related regulations for future new building developments. Reference may be made on similar practice in the Planning and Building Regulations Guidance¹ by the Planning Portal of the UK Government. See extract at below:

If you are installing an external light which is supplied from your electrical system and fixed to the exterior surface of your house (premise) then you should ensure that reasonable provisions are made to enable effective control and/or use of energy efficient lamps. Two options for achieving this are:

- *Installing a lamp with a capacity which does not exceed 150W per light fitting and the lighting automatically switches off both when there is enough daylight and also when it is not required at night.*
- *Ensuring that the lighting fittings you use have sockets that can only be used with lamps having an energy efficacy greater than 40 lumens per circuit-watt.*

4. The HKIE is concerned about the effectiveness of the "switch-off measures" as proposed by the Task Force. We would like to provide our views on the issues raised in the consultation document as follows:

Appropriate Preset Time

Having considered Hong Kong's situation and the concern for tourism, night life, commercial and entertainment sectors, it is thought that the option of "midnight to 7 am" as the specific time for switching off external lighting would seem more appropriate.

¹ Lighting Section, Planning and Building Regulations Guidance, Planning Portal of UK Government. <<http://www.planningportal.gov.uk/permission/commonprojects/lighting>>. Retrieved on 2 Oct 2013

Scope and Exemptions

The HKIE agrees to the rationale and items for the scope and exemptions as proposed in the consultation document. For clarity, we suggest that these two issues could be consolidated into a detailed list of corresponding scope and exemptions for “switch-off” to facilitate further consideration and easy understanding by the general public.

Implementation Approach

We welcome more elaboration and projection on the effectiveness of the proposed charter scheme and suggest that mechanisms should be established to measure and review its effectiveness. With the provision of proper and clear list of scope and exemptions, and with wide consensus among stakeholders, we suggest that a roadmap could then be laid down to identify the condition and timeline for the corresponding legislation as necessary.