

By post and by fax at 2377 1653

27 September 2013

Occupational Safety – Operations Division
Labour Department
Room 1021, 10/F
Cheung Sha Wan Government Offices
303 Cheung Sha Wan Road
Kowloon

[Attn: Mr CHUNG Wai-keung]

Dear Mr CHUNG

Views on Draft Guidance Notes on Safety at Work for Demounting, Mounting and Inflation of Tyres of Heavy Mechanical Vehicles

Thank you for your letter of 9 August 2013 inviting the Institution to put forth our views on the captioned subject.

The Hong Kong Institution of Engineers supports Labour Department's initiative in setting up guidelines on safety at work for demounting, mounting and inflation of tyres of heavy mechanical vehicles with an aim of reducing accidents in the relevant industries.

In regard to the interpretation of "Heavy Mechanical Vehicle" in Section 1.5 in the draft Guidance Notes, we opine that the definition seems too broad and general. Therefore, stakeholders of the industry may not be able to easily determine whether their vehicles fall within the ambit of the Guidance Notes or not. We suggest that the Labour Department should consider using more objective criteria (i.e. specify the tyre size and/or rim size of the wheel instead of the vehicle types) in order to determine whether the Guidance Notes should apply to their vehicle intended for the work.

With reference to Section 7.1(C) in the draft Guidance Notes on training of operators on demounting, mounting and inflation of tyres for various types of heavy mechanical vehicle, we are concerned that such training courses may not be common in the relevant industries. Therefore, it is suggested that the Labour Department should consider collaborating with the stakeholders to provide the necessary training courses for workers to acquire the most updated knowledge, skills and safe working procedures.

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Mr CHUNG Wai-keung

Thank you for your attention.

Yours sincerely



Monica YUEN (Mrs)
Chief Executive and Secretary

MY/WC