



By post and by email at eld-el-3@labour.gov.hk

18 June 2026

Labour Department
18/F., Harbour Building,
38 Pier Road, Central,
Hong Kong

Dear Sir/Madam

**Consultation on the
Revision of the Code of Practice for Metal Scaffolding Safety**

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 Department and offer our expertise and experience on the area of concern if and when it is needed.

Thank you.

Yours faithfully

Ms Sandy SO
Senior Executive Manager –
External Affairs



Enclosure

Views from The Hong Kong Institution of Engineers on Revision of the Code of Practice for Metal Scaffolding Safety

In response to Labour Department's draft revision of the *Code of Practice for Metal Scaffolding Safety* (CoPMSS), The Hong Kong Institution of Engineers (HKIE) would like to offer our views for consideration of the Department.

2. The HKIE fully supports the Department's ongoing efforts to enhance occupational safety for scaffolding works. However, it has been noted that a significant practical challenge persists during the erection and dismantling phases of scaffolding, as well as on greenfield sites where independent, permanent structural anchorage points are often unavailable for workers to attach their fall-arrest systems.

3. To address this practical reality without compromising safety, the HKIE advocates for an engineered solution utilising the predictable load-bearing capacities of Proprietary Scaffold Systems (專利棚架系統). We propose the inclusion of the following requirement into Section 5.3 of the CoPMSS to provide a regulated pathway for utilising scaffolding as anchorage:

4. *“When it is necessary to use a metal scaffold as an anchorage point for a worker's full-body harness, in addition to complying with the requirements for Proprietary Scaffold Systems, a Professional Engineer (Mechanical or Structural) must calculate and verify which specific parts of the metal scaffold possess adequate capacity to meet the anchorage requirements for the full-body harness of the worker on the scaffold and working platform.”*

5. We recommend maintaining the general safety principle against using scaffold components as anchorage, while introducing a caveat where appropriate to provide practical cross-references in the respective Sections.

6. In particular, under Sections 5.1.4(t) and 6.2.15, the text could be amended to state that *“Scaffold members should not be used for anchorage purposes unless specifically designed, calculated, and certified by a Professional Engineer as per Section 5.3”* to clearly guide workers during the high-risk erection and dismantling phases.

7. We believe this addition aligns with modern engineering practices and international standards, providing the industry with a pragmatic, safe, and verifiable method for fall protection when independent anchorages are unfeasible.