THE HONG KONG E&M CONTRACTORS' ASSOCIATION

The Hong Kong E&M Contractors' Association Limited
香港機電工程商協會有限公司

Room 1801 Tung Wai Commercial Building,
109-111 Gloucester Road, Wanchai,
Hong Kong.

Tel : (852) 2519 3226
Fax : (852) 2519 0298
E-mail: hkemca@gmail.com
Web site: https://hkemca.org/

Our ref: EMCA-2021-HS-001/GT

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Legislative Council Secretariat
Legislative Council Complex
1 Legislative Council Road
Central
Hong Kong

For the attention of Hon. LUK Chung-hung, JP
Chairman of LegCo Manpower Committee
and all LegCo Manpower Committee Members

(By post, fax: 2509 9092 &
Email: Ftu.mluk@gmail.com)

Dear Sir,

Legco Paper on Penalty System Proposal

Further to the EMCA letter ref. EMCA-2020-HS-009/GT dated 14 Dec 20 and the subsequent meeting with Secretary of Labour and Welfare Bureau Dr Law, the Legco members Mr Jeffrey Lam, Abraham Shek and WK Lo in Government Tamar office on 22 Dec 20, all the industry representatives expressed their view on the unfair and ineffective regulation on the contractors as this would distort and damage the whole industry because of the consequence of this unfair approach. From the view of Electrical and Mechanical Contractor Association, the penalty scheme cannot simply apply to any simple entity but have to review the whole supply chains with the supporting from the Construction and Design Management system (CDM) for all construction projects .

As reference to the papers on penalties of occupational safety and health legislation in the Legco paper CB(2)492/20-21 (07), the simple comparison on the penalty amount cannot reflect the true rationale on the penalty system as the training and the requirement of the skill workers and technicians are different in each country as this is one of the fundamental weak side in Hong Kong worker qualification and training system .

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EMCA always be ready to give the opinion from the MEP industry.

Thank you for your attention.

Yours faithfully

Gilbert TSANG
President
The Hong Kong Electrical & Mechanical Contractors' Association

cc Secretary for Labour & Welfare – Dr LAW Chi Kwong, GBS, JP *(Email: slwo@lwb.gov.hk)*
Commissioner for Labour Department – Mr SUN Yuk Han, Chris, JP *(Email: cl_office@labour.gov.hk)*
Legco – The Hon Abraham SHEK Lai-him *(Email: abrahams@netvigator.com)*
Legco – The Hon Ir Dr LO Wai-kwok *(Email: wklo@engineer.com)*
CIC Chairman – Sr K K CHAN, SBS, JP *(Email: kakuichan@cic.hk)*
HKFEMC – Mr Rocky Poon, President *(E-mail: RockyPoon@fseng.com.hk)*