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9 June 2025

Mr. YEUNG Yan Kin, Andy, FSDSM
Director of Fire Services
Fire Services Department
9/F, Fire Services Headquarters Building,
1 Hong Chong Road,
Tsim Sha Tsui East, Kowloon

By email: dfs@hkfsd.gov.hk

Dear Mr. Yeung,

Re: Urgent Concerns & Requests Regarding Eligibility of Architecture Degree Holders under the Registered Fire Engineer Scheme

We write to formally address our concerns regarding the exclusion of architecture degree holders from the eligibility criteria outlined in the **Fire Services (Registered Fire Engineers) Regulation** (submitted to the Legislative Council on 28 May 2025), referencing Section 10(ii) of the LegCo document CB(2)167/2025(04).

We refer to your letter dated 8 August 2024, which confirmed that holders of degrees from recognized university architecture programs, with six years of relevant work experience and completion of a top-up course, would be eligible to apply for registration as a Registered Fire Engineer (Risk Assessment). We write to clarify and reiterate that we have no objection for necessary top up courses as needed for Architects and Authorized Persons (APs) to be included in the system.

We trust that there must be some misunderstanding, or that things get lost in translation rendering us being excluded from the current qualified list of professionals. We learnt that graduates/professionals from Building Surveying, Civil Engineering, and Structural Engineering programs are eligible to apply for all three categories of Registered Fire



Engineer (RFE) namely, Risk Assessment, Fire Service Installation, and Ventilating System, whereas Architecture professionals appear to be excluded from similar recognition.

We wish to reiterate that recognized university Architecture programs comprehensively cover fire safety, as it is a fundamental aspect of building design. Architects assess buildings holistically, considering not only aesthetics but also functional and safety requirements, including fire safety compliance. This is further evidenced by the fact that local Architects and APs routinely handle fire safety-related Orders/Directions issued by your Department, as well as licensing applications for various premises. The relevance of our profession to fire safety is no less significant than that of Building Surveying or Engineering disciplines. For a fair arrangement compared to our peer professionals, we consider important that your Department include Architecture professionals to all three categories of RFE.

Contradictory Eligibility Framework

We are particularly perplexed by the rationale allowing:

- **Civil/ Structural Engineering/ Surveying degree holders,**

While excluding:

- **Registered Architects and Authorized Persons (APs) who:**
 - Bear statutory responsibility for fire safety compliance under the Buildings Ordinance;
 - Routinely handle FSD's Fire Safety Orders/ Directions;
 - Manage licensing applications for premises listed in **Annex 2**.

The exclusion of Architecture degree holders from the RFE Scheme, despite our profession's direct and extensive involvement in fire safety matters, appears inconsistent and undermines the principle of recognizing relevant professional expertise. The profession's relevance to fire safety is **no less significant** than that of Building Surveying or Engineering disciplines.

Professional Disparity

Registered Architects and Authorized Persons (APs) are uniquely positioned to execute RFE duties across all classes due to:



- **Comprehensive training** in fire-safe spatial planning, egress design, and materials specification;
- **Regulatory expertise** in interpreting and applying FSD requirements during design certification;
- **Practical responsibility** for coordinating fire service installations (FSI) and ventilating systems (VS) in building projects.

We therefore hereby formally request:

- **Inclusion of architecture degrees** under **Section 10(ii)** for **all three RFE classes** (Risk Assessment, FSI, VS);
- **Retention** of the 6-year experience pathway with top-up courses, as previously agreed.

We appreciate the FSD's initiative in proposing the RFE Scheme, which promises to enhance business facilitation and professional opportunities. Nevertheless, resolving this discrepancy is critical to ensure equitable recognition of qualified architects.

Finally, we would like to express our appreciation for your Department's initiative in proposing this Bill. We firmly believe it is a positive step toward engaging qualified private professionals to provide this kind of certification services to facilitate business operations.

Given the imminent commencement timeline (with the proposed commencement date of 1 November 2025), we seek your urgent attention to this matter and look forward to your confirmation of amendments.

Yours Sincerely,

Ar. LAU Man Kwan Julia, *CHKIA, CMILT, CStJ, JP*
President
The Hong Kong Institute of Architects

cc: Hon Tony TSE Wai-chuen, *BBS, JP* info@tonytsewaichuen.com

Licensed Premises to be covered under the Registered Fire Engineer Scheme

Ordinance/Regulation/Rules		Types of premises	Authority
1.	Food Business Regulation (Cap. 132X)	<ul style="list-style-type: none"> • General restaurant • Light refreshment restaurant • Factory canteen • Bakery • Food factory • Composite food shop 	<ul style="list-style-type: none"> • Director of Food and Environmental Hygiene
2.	Miscellaneous Licences Regulations (Cap. 114A)	<ul style="list-style-type: none"> • Public dance hall • Dancing school 	<ul style="list-style-type: none"> • Public officer appointed by the Secretary for Home and Youth Affairs
3.	Places of Amusement Regulation (Cap. 132BA)	<ul style="list-style-type: none"> • Billiard centre • Bowling centre • Public skating rink 	<ul style="list-style-type: none"> • Director of Leisure and Cultural Services
4.	Places of Public Entertainment Regulations (Cap. 172A)	<ul style="list-style-type: none"> • Cinema • Theatre • Place of public entertainment (other than a cinema or theatre) 	<ul style="list-style-type: none"> • Secretary for Home and Youth Affairs or any public officer authorised by him/her
5.	Education Ordinance (Cap. 279)	<ul style="list-style-type: none"> • School 	<ul style="list-style-type: none"> • Permanent Secretary for Education
6.	Non-local Higher and Professional Education (Regulation) Rules (Cap.493B)	<ul style="list-style-type: none"> • Premises for conducting registered courses or exempted courses 	<ul style="list-style-type: none"> • Registrar of Non-local Higher and Professional Education Courses
7.	Dutiable Commodities (Liquor) Regulations (Cap. 109B)	<ul style="list-style-type: none"> • Premises for the sale and consumption of intoxicating liquor 	<ul style="list-style-type: none"> • Liquor Licensing Board
8.	Funeral Parlours Regulation (Cap. 132AD)	<ul style="list-style-type: none"> • Funeral parlour 	<ul style="list-style-type: none"> • Director of Food and Environmental Hygiene
9.	Child Care Services Ordinance (Cap. 243)	<ul style="list-style-type: none"> • Child care centre 	<ul style="list-style-type: none"> • Director of Social Welfare
10.	Massage Establishments Ordinance (Cap. 266)	<ul style="list-style-type: none"> • Massage establishment 	<ul style="list-style-type: none"> • Commissioner of Police

Ordinance/Regulation/Rules		Types of premises	Authority
11.	Hotel and Guesthouse Accommodation Ordinance (Cap. 349)	<ul style="list-style-type: none"> • Hotel • Guesthouse 	<ul style="list-style-type: none"> • Hotel and Guesthouse Accommodation Authority
12.	Clubs (Safety of Premises) Ordinance (Cap. 376)	<ul style="list-style-type: none"> • Club-house 	<ul style="list-style-type: none"> • Secretary for Home and Youth Affairs
13.	Amusement Game Centres Ordinance (Cap. 435)	<ul style="list-style-type: none"> • Amusement game centre 	<ul style="list-style-type: none"> • Public officer appointed by the Secretary for Home and Youth Affairs
14.	Bedspace Apartments Ordinance (Cap. 447)	<ul style="list-style-type: none"> • Bedspace apartment 	<ul style="list-style-type: none"> • Secretary for Home and Youth Affairs
15.	Residential Care Homes (Elderly Persons) Ordinance (Cap. 459)	<ul style="list-style-type: none"> • Residential care home for the elderly 	<ul style="list-style-type: none"> • Director of Social Welfare
16.	Drug Dependent Persons Treatment and Rehabilitation Centres (Licensing) Ordinance (Cap. 566)	<ul style="list-style-type: none"> • Drug dependence treatment centre 	<ul style="list-style-type: none"> • Director of Social Welfare
17.	Karaoke Establishments Ordinance (Cap. 573)	<ul style="list-style-type: none"> • Karaoke establishment (other than that in a restaurant, hotel, guesthouse or club) • Karaoke establishment (in a hotel, guesthouse or club) • Karaoke establishment (in a restaurant) 	<ul style="list-style-type: none"> • Secretary for Home and Youth Affairs • Secretary for Home and Youth Affairs • Director of Food and Environmental Hygiene
18.	Residential Care Homes (Persons with Disabilities) Ordinance (Cap. 613)	<ul style="list-style-type: none"> • Residential care home for persons with disabilities 	<ul style="list-style-type: none"> • Director of Social Welfare