



香港建築師學會

The Hong Kong Institute of Architects

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By Fax and By Post
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Director of Environmental Protection
Environmental Protection Department
33/F Revenue Tower
5 Gloucester Road
Wanchai
Hong Kong
Attn : Mr Leung Wah Hing Albert, Air Policy Group

Dear Mr Leung *Albert*

Invitation for comments on The Review of Indoor Air Quality Management in Hong Kong

Thank you for your letter on the captioned received on 22 August 2011. The Hong Kong Institute of Architects is pleased to respond to the invitation for comments on the Review of Indoor Air Quality (IAQ) Management in Hong Kong.

The review recommends to maintain the current voluntary and self regulatory approach for IAQ management. The social survey conducted revealed that implementation of IAQ management has a discernable effect on the awareness of the importance of IAQ and the scheme is effective in improving IAQ in offices and public spaces. As many workers have little alternative to working in enclosed office space for at least eight hours a day their well being depends on the IAQ of the workplaces. Hong Kong should recognise IAQ as a health and safety issue and IAQ management should gradually migrate from being on a voluntary basis to a mandatory basis, starting with premises of larger scale. The institute recommends mandatory implementation of new system should follow a segmentation approach, starting with premises that are the most appropriate and ready, for example with licensed premises over a certain size.

The HKIA supports the extension of the IAQ management programme to cover other types of premises. The priority should be on the building types where the users or the inmates have to stay indoor for prolonged periods. Elderly homes, education facilities and workplaces would be the apparent choice for the extension of IAQ management.

The recommendation in the report to strengthen the promotion of low emission indoor building materials and the issuing of guidelines and codes of practice is necessary and timely. The promotion should aim to inform both the public and the industry practitioners. A guide to where to obtain such materials and how to identify the low emission products would also be useful.

The Institute supports the recommendations in the Report for the inclusion of the World Health Organisation IAQ pollutant measures in HK IAQ management. The Institute has reservation to removing the three comfort parameters from the current IAQ management regime. The comfort parameters, while not conclusively proven to link to the prevalence of diseases, are directly related to the feeling of well being. An indoor air environment which is extremely uncomfortable cannot be said to be a good environment even in the absence of pollutants.

The HKIA recommends that the Government should carry out more research on the subject to obtain practical information appropriate for Hong Kong to guide future policy decisions.

Yours sincerely

Dominic K K Lam *FHKIA*
President

Patron: The Honourable Donald Tsang Yam-Kuen, Chief Executive, Hong Kong Special Administrative Region
A Member of The International Union of Architects (UIA), Commonwealth Association of Architects (CAA) and Architects Regional Council Asia (ARCASIA)

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