

**Independent Committee in relation to the fire
at Wang Fuk Court in Tai Po**

Closing Address for Victory Fire Engineering Ltd

A. Introduction

1. Victory Fire Engineering Ltd (“Victory Fire”) was the registered fire service installation contractor (“RFSIC”) at Wang Fuk Court responsible for annual inspection.
2. It was NOT the RFSIC responsible for the renovation works at Wang Fuk Court.
3. There was another RFSIC for the renovation works at Wang Fuk Court i.e. China Status Development and Engineering Company Limited (“China Status”).
4. ISS Eastpoint Properties Limited (“ISS”) was the property manager of Wang Fuk Court.
5. After the 2025 annual inspection, Victory Fire was re-appointed as the RFSIC to carry out the rectification of fire service defects at Wang Fuk Court **R1/695-747**].

B. Witnesses

6. There are witness statements given by Victory Fire for this Independent Committee:
 - (1) 鍾傑文 Chung Kit Man (“Mr. Chung”) [WS2/1528-1536][WS7/1897-1900];
 - (2) 李俊賢 Li Chung Yin (“Mr. Li”) [WS2/1537-1540];
 - (3) 唐慶麟 Tong Hing Lun (“Mr. Tong”) [WS2/1541-1544];
 - (4) 黃建華 Wong Kin Wa (“Mr. Wong”) [WS2/1545-1548];
 - (5) 梁文仲 (“Mr. Leung”) [WS2/1549-1552] [WS7/1891-1896].

7. There are police statements disclosed in the bundle:
 - (1) By Mr. Chung [R1/182-185];
 - (2) By Mr. Li [R1/186-187];
 - (3) By Mr. Tong [R1/188-190];
 - (4) By Mr. Wong [R1/191-192].

8. There are 4 factual witnesses attended hearing:
 - (1) Mr. Wong on 30 March 2026 [T/30-3-2026/37:20-69:22];
 - (2) Mr. Chung on 30 March, 31 March and 8 April 2026 [T/30-3-2026/69:27-74:36 to T/31-3-2026/1:8-63:1] [T/8-4-2026/12:32-50:32];
 - (3) Mr. Li on 31 March 2026 [T/31-3-2026/63:7-72:32];
 - (4) Mr. Tong on 8 April 2026 [T/8-4-2026/1:11-12:27].

C. Victory Fire's Duties under the Existing Regulatory Framework

9. In paragraph 58 of the Written Opening Address of Counsel for the Independent Committee, the following question was asked:

"...Should Victory Fire have done more in these circumstances to ensure that the fire alarm systems were operational, or at least to inform the Fire Services Department of the shutdown?"

10. Victory Fire examines below its duty under the existing regulatory framework as at the time of the fire or shortly before the fire.

C1. Objective Interpretation of FSD Circular Letter No.1/2021 and Shutdown Notice ("SDN") Requirement

11. Victory Fire submits that under the existing regulatory framework, particularly in or about November 2025, there was no duty for Victory Fire to notify FSD when it discovered the Fire Alarm System ("FAS") was off on 19 November 2025:

- (1) SDN was the only way to inform the Fire Services Department ("FSD") about the shutdown of the FAS. This can be seen in FSD Circular Letter No.1/2021 *"The notification of FSI shutdown to the FSD shall ONLY*

be made by using the Notification Form in **Appendix I** that any other types of written or verbal notification will not be accepted....” [B2/1305] (Chinese version at A3/210). This was confirmed by FSD’s Assistant Director (Licensing and Certification) Mr. Keung Sai Ming [T/6-4-2026/84:21-22];

- (2) According to sub-paragraph (A) of FSD Circular Letter No.1/2021, a RFSIC is only required to submit a SDN when there was a shutdown of one of nine equipment of FSI system for overnight or 24 hours [B2/1303]:

*“When an RFSIC is employed to maintain/inspect/modify/repair the following FSI(s) of which the work(s) is/are expected to be carried out overnight or for more than 24 hours continuously, the RFSIC should notify the FSD the defect(s) as soon as possible within 24 hours after the defect(s) is/are identified literally.
.....”*

The corresponding section in the SDN template [B2/1308]:

本公司確認以下受影響的消防裝置需要通宵或連續超過 24 小時關閉				
☐ 消防栓/喉嚨系統	☐ 花灑系統 [□]	☐ 乾喉系統	☐ 火警偵測系統(存在休眠風險的處所)	
☐ 火警警報系統	☐ 噴水系統	☐ 排煙系統	☐ 樓梯增壓系統	☐ 街道消防栓系統

- (3) By looking at part 1 and part 3, the design of SDN template was for the RFSIC who was responsible for shutting the equipment to sign on and submit it to FSD [B2/1308];
- (4) Sub-paragraph (B) of FSD Circular Letter No.1/2021 [B2/1303] states

“Written notification should be made if the shutdown is arisen from a situation where there are defects in the FSI system which may, in the event of fire, put the entire building or licensed/registered premises mentioned in sub-paragraph (C), in jeopardy.....”

It is noted that there is no exact match in the SDN template for sub-paragraph (B).

(5) Victory Fire submits that the sub-paragraph (B) is only applicable when there are defects and it is not applicable when a RFSIC discovers that a FSI system was shutdown for another purpose.

(6) In the new FSD Circular 2/2026 [C3-1/1985] which was to reiterate the contents of FSD Circular Letter No.1/2021, it is expressly stated that it was the RFSIC who carried out and notified the shutdown to assess the effect of the shutdown. It was not another annual inspection RFSIC on site like Victory Fire to assess or notify the shutdown effect.

(7) In the long term, the FSD is undertaking legislative amendments to enhance fire safety governance. These amendments include strengthening FSI regulation by requiring the FSD's approval for or shutdowns to ensure necessity and accountability [WS8/1919/§25]. This is obviously to address mischief of the existing regulatory framework in FSI shutting down. This shows that there is no such positive duty of reporting imposed on Victory Fire under the existing regulatory framework.

12. Given the above, Victory Fire submits that it had no duty and no proper channel to inform FSD about the shutdown of the FAS and the pumps.

13. Victory Fire submits that it also has no duty to coordinate with China Status which submitted the SDN.

14. Victory Fire had no information nor knowledge about what was ongoing at Wang Fuk Court at that time with reference to the works by RFSIC in charge of the renovation. They had no knowledge as to who was the other RFSIC. Victory Fire's position is acknowledged by the Director of Fire Services Mr. Yeung Yan-kin, Andy ("Mr. Yeung") at the evidential hearing [T/24-4-2026/41:34-42:4]:

“林樂夫大律師：咁亦都其實消防處從來就有特別諗過係依賴一個註冊消防承辦商，例如係年檢嘅執修嘅承辦商，係去通知消防處有關於另一個好似大維修消防承辦商咁，係佢入 SDN 入得啱唔

咁咁樣嘅，即係你從來消防處都有諗過倚賴年檢嘅執修承辦商，係咪？

楊恩健先生：要解釋清楚你個問題就係，因為個消防承辦商應該唔知道另外個消防承辦商入個個SDN嘅內容，最主要就係佢發現咗，佢做維修個時佢發現咗消防系統有問題，佢就應該要向我哋報，呢個係佢作為一個註冊消防承辦商嘅責任。”

15. Victory Fire submits that as the annual inspection RFSIC, it should not have known what China Status had submitted in its SDN. Victory Fire's own duty was from sub-paragraph (B) of FSD Circular Letter No.1/2021 in relation to discovery of defects, but not when the fire alarm was shut down for renovation or other purposes. Moreover and unfortunately, Victory Fire did not receive any SDN from ISS before the fire.

C2. FSD's Interpretation of FSD Circular Letter No.1/2021 and the SDN Requirements

16. In the police statement of SHEK Ngai-chun (Licensing and Certification Command – Fire Protection Facilities Supervision Division) said that [C3-3/2246]

“問5) 如果 Victory 公司在執修消防系統的時候，發現消防警報系統被關閉，當日是否需要即時通知消防處？

答5) 任何承辦商在維修期間如發現任何消防系統已處於關閉狀態，均有責任即時確認該關閉是否已按規定向消防處通報”。

17. He was responsible for monitoring whether RFSICs complied with the law [C3-3/2241/§2]. Licensing and Certification Command was the contact point stated in FSD Circular Letter No.1/2021 [B2/1307].

18. Therefore, Mr. Shek's understanding of the existing requirements is important.

19. Further, Director of Fire Services Mr. Yeung also interpreted an annual inspection RFSIC only had its own independent duty under the existing

regulatory framework before the fire at Wang Fuk Court [T/24-4-2026/41:29-42:12]:

“林樂夫大律師：即係話其實從來消防處，即係尤其是係 2026 年之前，其實冇要求過即係一間消防承辦商，好似年檢執修嘅承辦商，係去監察另一個即係例如大維修嘅消防承辦商，究竟佢入 SDN 入得啱唔啱，門個系統啱唔啱㗎嘛，你有要求㗎嘛，係咪？”

楊恩健先生：我哋嘅通函裏面有要求過消防承辦商發現咗，個大廈嘅消防系統如果有損壞，有不當嘅地方，要向我哋匯報。

林樂夫大律師：咁亦都其實消防處從來就有特別諗過係依賴一個註冊消防承辦商，例如係年檢嘅執修嘅承辦商，係去通知消防處有關於另一個好似大維修消防承辦商咁，係佢入 SDN 入得啱唔啱咁樣嘅，即係你從來消防處都有諗過倚賴年檢嘅執修承辦商，係咪？

楊恩健先生：要解釋清楚你個問題就係，因為個消防承辦商應該唔知道另外個消防承辦商入個 SDN 嘅內容，最主要就係佢發現咗，佢做維修嗰時佢發現咗消防系統有問題，佢就應該要向我哋報，呢個係佢作為一個註冊消防承辦商嘅責任。

林樂夫大律師：明白，即係獨立嘅責任，你嘅意思。

楊恩健先生：係。

林樂夫大律師：但係喺--啱啱我哋都討論，即係我最後一個問題，就係有兩個或者多過兩個嘅註冊消防承辦商喺同一個屋苑、同一個大廈做嘢嘅時候，其實喺 2026 年之前嗰啲機制係有一個協調嘅機制，係等佢哋兩個或者多過兩個係知道大家做咩乜嘢嘅，係咪？

楊恩健先生：應該係佢哋自己嘅專業裏面，佢有個專業嘅責任，頭先我講，去講番佢見到個消防系統嘅問題。”

20. Victory Fire disagrees with Mr. Keung's interpretation that Victory Fire should have also filed a SDN [WS8/1914/§14]:

(1) Mr. Keung only mentioned this alleged requirement in his 4th witness statement dated 6 April 2026 in the middle of the hearing.

(2) His interpretation is not supported when one reads the SND template and FSD Circular Letter No.1/2021 as submitted hereinabove.

(3) His interpretation conflicts with that of Mr. Shek and Mr. Yeung.

21. In any event, Victory Fire submits that even FSD's officers have different understanding of the shutdown notification requirements, RFSICs including Victory Fire are not to be blamed for having different understanding of the notification requirements with Mr. Keung.

C3. Comparing to the Reform introduced by FSD

22. Apart from looking at the requirements under FSD Circular Letter No.1/2021 and the SDN template, Victory Fire's interpretation on its duties under the existing regulatory framework at the time of the fire is also reflected from the reforms introduced by FSD after the fire at Wang Fuk Court.

23. FSD has new medium-term measures for FSD to proactively conduct inspections and functional tests of FSIs in about 1,500 residential buildings constructed on or before 1 March 1987 where any notification of defective or shutdown about FAS and/or fire hydrant/ hose reel system from the RFSICs has been received, to verify the operational status of the FAS [WS1/154/§16].

24. One of the aims is to check if another FAS would be affected if one system was shut down [T/24-4-2026/40:31-36]:

“林樂夫大律師：因為我照咁睇你證人口供第 16 段，其實其中一個情況就係你收到 (English Spoken) 咁嘛，即係其中一個情況就係有人--消防承辦商入咗一個 SDN，係門咗個消防栓系統，跟住你會去主動去睇一睇係嗰個警鐘係咪運作到，係咪？”

楊恩健先生：而家個新架構裏面都係會咁，會睇個警鐘同埋個 (English Spoken) 個電掣有冇門到。”

25. This is a new measure and in the existing regulatory framework at or before the fire at Wang Fuk Court, FSD relied on the notification of the RFSIC

who carried out the shutting down and filed the SDN in relation to how many FASs would be affected [T/24-4-2026/41:3-5]:

“林樂夫大律師：咁而喺 2026 年 1 月之前，其實消防處其實都依賴入 SDN 嗰個消防承辦商，就話畀消防處聽，咁係影響一個定係兩個系統，係咪？”

楊恩健先生：冇錯。”

26.FSD introduce Proposed Amendments to Fire Services Ordinance (Cap. 95) and its related Subsidiary Legislation in May 2026 [B14/6268-6326].

27.FSD propose:

(1)to amend the legislation to upgrade the regulatory regime of major FSI shutdowns, bringing it up from administrative “post-event notification” to statutory “pre-approval” checks [B14/6272/§6].

(2)A new offence on any person who wilfully or recklessly misuses or interferes with an FSI [B14/6273/§9].

(3)introducing a new statutory duty requiring RFSICs to notify the FSD promptly, i.e. in no more than 24 hours, upon discovering that a major FSI is defective and no longer in efficient working order [B14/6273/§11].

(4)introducing the regime of FSI “Responsible Persons”, specifically including two categories: first, the owner or occupier of the premises; second, any person who has management or control of the FSI (i.e. including property management companies engaged to manage FSIs) [B14/6273/§13].

(5)the FSD be granted statutory powers such that, where there are reasonable grounds to believe that a reinspection is warranted for safety reasons and is in the public interest, it may require the Responsible Person to appoint another RFSIC to conduct a re-inspection on the FSI

so as to verify whether it is in efficient working order. Failure to comply with the requirement will constitute an offence [B14/6273/§13].

28. Victory Fire submits that all these proposed amendments are to rectify the missing links /improve the existing regulatory framework at the time of the fire.

29. This affirms Victory Fire's submission that under the then regulatory framework it has no duty inform FSD about the shutdown of the FAS a few days before the fire in fact 4 working days before the fire and it has no duty to coordinate with China Status which submitted the SDN.

D. Victory Fire's Actions

1. After examining Victory Fire's duty under the existing regulatory framework as at the time of the fire or shortly before the fire, Victory Fire would like to emphasize what it had done after discovering that the FAS was off on 19 November 2025.
2. Victory Fire's staff had informed ISS immediately after they discovered the FAS was shut down by others.
3. Ms. Cheng of ISS was the contact point of ISS to Victory Fire [R1/694]. It was natural for Victory Fire's Mr. Li and Mr. Wong to contact Ms. Cheng.
4. Mr. Li said that he had a discussion with Ms. Cheng [WS2/1538/§5]:

“.....其後， 本人向宏福苑管理處鄭小姐（電話： 9810-）（ 下稱「鄭小姐」查詢， 得知宏福苑共 8 座大廈因大維修需暫停消防系統， 並已向消防處掛牌（即向消防處存入消防裝置關閉通知書， 下稱「掛牌」）。

5. Also, in the hearing Mr. Li said [T/31-3-2026/71:9-13]:

“許偉強資深大律師：呢度我就睇番你呢一份口供，就有特別話同鄭小姐有去討論過關於呢啲大廈大維修，邊啲消防系統需要暫停呢樣嘢，係咪有特別同鄭小姐有傾過？

李俊賢先生：有。

許偉強資深大律師：有傾過，但係只不過你呢度有特別寫出嚟？

李俊賢先生：係。”

6. Yet, Victory Fire submits that Ms. Cheng’s memory is not reliable. She said she did not recall any conversation with Mr. Li on 19 November 2025 [T/2-4-2026/62:3-5]:

“林樂夫大律師：係，咁就住你嘅律師，咁我都想問番就係，係你嘅記憶入面，係咪直情有同李生有傾過任何嘢？喺 2025 年 11 月 19 日。鄭芷盈女士：係嘞。”

7. Mr. Li’s version is also supported by the whatsapp record between himself and Mr. Leung on 19 November 2025 [R4/1143]:

From	Time	Transcript
Leung Man Chung	12:51	喂，頭先看更話俾大廈維修個班俾要做嘢，所以門晒啲泵佢話佢哋掛咗牌。
Li Chun Yin	13:02	我知道啦，頭先嗰個咩鄭小姐覆咗我啦。

8. Mr. Wong said that said that he had a discussion with Ms. Cheng on 19 November 2025 [WS2/1546/§6]:

“其後，我立即向宏福苑管理處鄭小姐（電話：9810-（下稱「鄭小姐」）當面查詢，並得知宏福苑共 8 座大廈當時正在進行大維修工程，當中包括維修水缸，故需要暫停消防系統，並已就此向消防處掛牌（即向消防處存入消防裝置關閉通知書，下稱「掛牌」）”

9. Also, in the hearing Mr. Wong said he requested for a SDN submitted by others [T/30-3-2026/60:16-30]:

“黃健華先生：係嘞，咁我就走去搵阿鄭小姐問佢知唔知咁嘅情況。

李澍桓大律師：係。

黃健華先生：咁佢就回覆話係佢哋有消防工程做緊，咁就要門咗個總掣，跟住因為個消防--18 佢話個宏業，即係嗰間大判就請咗佢哋嘅消防公司承辦商去暫停咗個系統，跟住我走去問佢，「如果你暫停系統有冇掛牌呀？」即係我意思就係咁講，SDN 有冇掛牌，佢就話佢哋有掛牌嘅。同埋..

李澍桓大律師：呢個係喺 11 月 19 號你知悉咗個總掣畀人門咗嘅時候問，定係 11 月 26 號..（聽不清）

黃健華先生：19 號，19 號。

李澍桓大律師：19 號你已經問咗？

黃健華先生：係嘞。

李澍桓大律師：咁你當時就已經有向佢要求過話睇啲 SDN？

黃健華先生：係。

李澍桓大律師：但係佢畀唔畀到你呀？

黃健華先生：佢話搵唔到，即係嗰一刻搵唔到。”

10. Again, Ms. Cheng's memory was not very reliable. She could remember she had a discussion with Mr. Wong but did not remember the date [T/2-4-2026/60:34-36]

“林樂夫大律師：咁因為當時就有講個日子，你話確實日子唔記得，而家我想確認下，就你同唔同意係 2025 年嘅 11 月 19 日，你同黃生有個對話？

鄭芷盈女士：我唔記得咗個日子，但係如果你話黃生係嗰個日刺，咁有機會係嗰一日囉。”

11. Though Ms. Cheng denied that the content of her discussion with Mr. Wong was about SDN [T/2-4-2026/61:19-21], Victory Fire submits that since her memory was so vague, her version of events on these conversations cannot be relied on.

12. Moreover, Mr. Lam of ISS said he requested for a submitted SDN from Ms. Cheng [T/1-4-2026/89:35-90:15]:

“孫靖乾資深大律師：跟住到10月頭，你返番嚟，咁你就從管理處得知，佢就係仍然係針對一啲嘅天台嘅消防水缸係進行緊一啲嘅工程，或者你叫做執修？”

林文欣先生：係。

孫靖乾資深大律師：係。咁就係跟住管理處就有同事話畀你知，就已經向消防處掛咗牌？

林文欣先生：係。

孫靖乾資深大律師：係。你會唔會記得係邊位同事講？

林文欣先生：邊位同事講，我問過鄭主任。

孫靖乾資深大律師：你問過鄭主任。

林文欣先生：係。

孫靖乾資深大律師：咁你作為即係工程部，咁你有冇問鄭主任即係第一，去攞番個文件嚟睇一睇？

林文欣先生：當時我想問嘅，但係未有時間去問，但係我好強調佢哋話有掛牌嘅，咁樣同我講，我都追問呢樣嘢嘅，佢話有嘅。

孫靖乾資深大律師：你想問，但係就未有時間問？

林文欣先生：未睇到，應該係話。

孫靖乾資深大律師：未睇到。

林文欣先生：佢哋會有嘅咁囉。”

13. Ms. Cheng's answer was no recollection and not sure [T/2-4-2026/62:24-29]

“林樂夫大律師：咁佢嘅口供就話，喺10月16日，就問你有關於掛牌嘅嘢，係咪？”

鄭芷盈女士：我有聽到佢咁講。

林樂夫大律師：你同唔同意佢咁講？

鄭芷盈女士：我有呢個印象。

林樂夫大律師：哦，即係你都話冇講過畀林生聽，係咪？

鄭芷盈女士：唔肯定，呢個。”

14. Victory Fire submits that in light of Ms. Cheng's vague memory, the evidence of Mr. Li and Mr. Wong shall be accepted.
15. Victory Fire had done what it deemed appropriate i.e. to inform the management company ISS [T/31-3-2026/44:1-9].

E. Factual Dispute between Victory Fire and ISS

16. As seen in the above, there is a factual dispute between Victory Fire and ISS whether Victory Fire's staff had informed Ms. Cheng of ISS about the shutdown of the fire alarm system.
17. ISS may try to attack Mr. Chung's credibility that there was no alleged discussion on 21 November 2025 based on the record of calling [H5/6815] [T/31-3-2026/63:7-72:32]. However, when one looks into the whatsapp records between Mr. Chung and Ms. Cheng of ISS on 28 October 2025 [H/6805], Victory Fire submits that since Mr. Chung asked about “同埋入番水未”, they must have prior discussion about the suspension of rooftop fire water tank.
18. This was confirmed by Ms. Cheng herself at the hearing [T/2-4-2026/62:17-20]
- “林樂夫大律師：佢--咁而佢咁問你，咁你哋其實喺當時 10 月 28 號嘅對話，其實大家已經係雙方都理解到大家講乜嘅嘛，咁就係大家都知道其實佢咁問，你之後答佢，其實大家都知道當時嗰刻 10 月 28 號消防水缸冇水，係咪？
- 鄭芷盈女士：可以咁講嘅。”
19. Ms. Cheng also admitted that Mr. Chung and her had a telephone discussion on 17 October 2025 [R2/850][T/2-4-2026/62:33-35].
20. In the whatsapp record between Mr. Chung and Ms. Cheung of Victory Fire on 19 November 2025, Mr. Chung said Ms. Cheng of ISS told him that they have submitted SDN (有掛牌) [R4/1122].

21. All these contemporaneous records show that Ms. Cheng of ISS did inform Victory Fire that a SDN had been submitted to FSD.
22. However, given (1) the difference between FSD being notified of the FAS shutdown would be more fire extinguishers be placed as standby means [B2/2203] and (2) in light of the conclusion in the Final Investigation Report No. 5 Alarm Fire at Wang Fuk Court on 26 November 2025 by Inter-Department Fire Investigation Task Force [ER1/72/5.4.7.6] that the alternative fire extinguisher would not have been suitable for use in this unprecedented situation, Victory Fire submits that the issue whether ISS was informed by Victory Fire on the shutdown of FAS may not make the real difference in reality.
23. Under the current policy “Fire Services Departmental Policy Instructions (DPI) Part IV 4.2.16 – General Procedures for Handling Defective FSI and FSI Shutdown Cases” [B2/2203], the applicable guidelines for provision of standby means for Wang Fuk Court (which had FH/HR system but no sprinkler system) was:

“Scenario 5

- *FH/HR System is inoperative; and*
- *Fire Alarm System is not provided/inoperative*

Suggested standby means

One 9-litre water-type fire extinguisher shall be provided at each hose reel point of affected area.

Scenario 6

- *FH/HR System is inoperative; and*
- *Fire Alarm System is in efficient working order.*

Suggested standby means

One 9-litre water-type fire extinguisher shall be provided at each hose reel point on alternative floors; or at each hose reel point of the affected area if only one floor is affected.”

24.The difference between Scenario 5 and Scenario 6 is that the FAS is working in Scenario 6, and the corresponding standby means of Scenario 6 is that 9-litre water-type fire extinguishers are only required to be provided at alternative floors.

25.Assuming the FAS at Wang Fuk Court was working properly, after receiving SDN from China Status, Wang Fuk Court was assessed to be Scenario 6 [**Police Statement of Lam Sze-wing at C3-1/1797/§5**].

26.This was confirmed by FSD's Assistant Director (Licensing and Certification) Mr. Keung Sai Ming [**T/6-4-2026/86:29-36**].

27.In the Final Investigation Report No. 5 Alarm Fire at Wang Fuk Court on 26 November 2025 by Inter-Department Fire Investigation Task Force [**ER1/72**] it was concluded that the hose reel system and the alternative fire extinguisher would not have been suitable for use and the shutdown of FH/HR system had minimal impact in this unprecedented situation:

“5.4.7.5 If the hose reel system is under maintenance or out of service, temporary alternatives should be provided, such as placing 9-liter water fire extinguishers on every other floor. However, in the Wang Fuk Court fire, by the time residents noticed the fire, it had already become severe. As a result, the hose reel system or its alternative water fire extinguisher would not have been suitable for extinguishing a fire of this magnitude.”

5.4.7.6 Given the extreme circumstances detailed in the preceding paragraphs, the shutdown of the FH/HR system had minimal impact in this unprecedented situation. The presence or absence of water in the fire service water tank at Wang Fuk Court was unlikely to have a significant influence on the overall firefighting operation.”

28.In this regard, there is a question whether the standby means recommended under both Scenarios, in particular Scenario 5 (i.e. when FAS was inoperative)shall be reviewed.

29. For completeness, it is also noted that there is also a dispute on what had been discussed between Mr. Lam of ISS and Mr. Chung in the midnight after the fire. Victory Fire submits that it is not important. In any event, Victory Fire submits that Mr. Chung's version shall be accepted.

F. Conclusion

30. Victory Fire expresses deep sorrow about the fire at Wang Fuk Court in Tai Po.

31. Victory Fire would like to emphasize that it has complied with the existing duties imposed to it at the time of the fire.

32. Victory Fire welcomes and also commits to comply with the coming new medium-term, long-term measures and the proposed new amendments to the legislation introduced by FSD.

33. Yet, Victory Fire cannot be said to have contributed to the fire at Wang Fuk Court in Tai Po.

34. Instead, Victory Fire submits that it is more important to look forward how to improve the fire safety in the future.

35. As one of the RFSICs, Victory Fire would like to be given more training and guidelines from FSD in future for upkeeping the standard and integrity of the profession for the sake of fire safety in general in the city:

(1) to improve communications between different RFSICs at the same site;

(2) how to contact or clarify with FSD in case there is any query in relation to implementation of the new amendments to the legislation and guidelines disseminated in FSD circulars;

(3) to understand the extent of RFSICs' duties in carrying out different type of works. For example, whether the duties of a RFSIC in renovation projects are the same as that of a RFSIC doing annual inspection.

36. Furthermore, Victory Fire agrees with Prof. Asif Sohail Usmani and Prof. Jiang Liming's recommendations in relation to additional FSI protection for renovation works [ER3/2254/§7.3.1(g)]:

“Caution against the occupation of renovated buildings and supply additional FSI protection: Residents may be cautioned against occupying high-rise buildings under maintenance and renovation, and the regulatory bar should be raised where this is considered unavoidable by providing fool-proof safety procedures for ensuring occupant safety in the event of a fire. This may require installing redundant FSI systems before the commencement of the building maintenance and renovation work as part of temporary works undertaken. The requirement of redundant safety measures must be modulated based on the projected duration of the works, with additional measures mandated for longer duration projects. For projects lasting longer than an acceptable duration, the provision of alternative accommodation for all or the most vulnerable occupants (based on ability and the height of the floor they occupy and distance from the exits) should be considered.”

37. Victory Fire also agrees with FSD that new technology shall be introduced. Mr. Keung in his 1st witness statement proposes new technology based temporary measures to give alert to occupants in the event that FAS was out of service [WS1/143/11.4]:

“Finally, in situations involving the failure of a FAS, it is recommended that property owners, management bodies, and the RFSIC take proactive steps to, promptly and adequately, notify building occupants of the shutdown of those major FSI , including the FAS. Such notification should include posting detailed information about the shutdown at the entrances, inside the main lobby, outside the F.S. control room and at prominent locations on each affected floors of the building, clearly labeling each non-operable component, and distributing notices to each occupant's mailbox to ensure that all residents are adequately informed. In the long term, the FSD will explore more reliable, practical, and technology-based temporary measures to give alert to occupants in the event of a fire when the alarm system is temporarily out of service.”

38.FSD Assistant Director (Fire Safety) Mr. YUNG Kam Hung, Michael also said that FSD was looking for alternative measure in case that FAS was out of service [T/22-4-2026/25:29-33]:

“翁錦雄先生：好呀。就住如果係火警個警報系統嗰度，其實雖然唔係我負責嘅，係姜先生嗰邊負責嘅。其實佢哋都係已經係--據我所知係搵緊一啲--物色緊一啲可以做一啲臨時火警鐘響到個情況，即係如果個火警鐘係壞咗唔響嘅，佢哋係物色緊一啲可行嘅替代方案，我知佢哋其實都好似物色到類似一啲比較佢哋都覺得認為可以接受嘅情況，佢應該就同業界係喺度商討緊嘅。”

39.Prof. Asif Sohail Usmani and Prof. Jiang Liming's recommended automated monitoring systems based on computer vision as a component of the redundant FSI systems and potentially suppression systems [ER3/2254/§7.3.1(i)]:

“Improved monitoring of renovation works: Once the building maintenance and renovation work starts, continuous monitoring of the site should be undertaken using currently available manpower and automated monitoring systems based on computer vision (as a component of the redundant FSI systems) with independent detection and potentially (where feasible) suppression systems. The monitoring system should also be able to identify debris accumulation and any other fire hazards that could present a secondary ignition source.”

40.Prof. Asif Sohail Usmani added in the hearing that there was sprinkler system used in the mainland and personalised alarms which were already available in the market which can be used as temporary measures [T/25-6-2026/79:22-80:13]

“PROF ASIF SOHAIL USMANI: That's a good question. Apparently there are sprinkler systems for these kind of temporary works used in the mainland. So I think in that sense it could potentially be done as an immediate recommendation. Or if you can't do that, then perhaps don't use combustibles.

MR JEFFREY TAM: I see. So technology-wise it is already available?

PROF ASIF SOHAIL USMANI: It is there.

MR JEFFREY TAM: I see. Then is there any other redundant FSI systems that can be implemented immediately?

PROF ASIF SOHAIL USMANI: I guess this is kind of personalised alarms and other kind of suppression systems which are specific to the temporary works rather than, say, the stuff that's inside. We need to think about what we can do but I guess these are some of the basic ones."

41. Victory Fire agrees with FSD's and the experts' recommendations to implement redundant personalised fire alarms in case of FAS shut down in the future. These recommendations can hopefully be considered by FSD in reforming its guidelines for standby means under Scenario 5.

42. Victory Fire looks forward to seeing if these recommendations will be adopted by FSD in the near future.

Dated this 6th July 2026



Solomon Lam

Counsel for Victory Fire Engineering Ltd



Solicitors for Victory Fire Engineering Ltd