



HONG KONG
RETAIL MANAGEMENT
ASSOCIATION

香港零售管理協會

26 January, 2018

Mr. Bankee Kwan, JP
Convenor
Business Facilitation Advisory Committee -
Wholesale & Retail Taskforce

Dear Mr. Kwan,

Concerns on the Response Time for Business Licensing

On behalf of the Hong Kong Retail Management Association, I would like to bring to the attention of the Business Facilitation Advisory Committee (BFAC) about our members' concerns on the response time for different types of business licensing, including those for restaurants, and Food and Beverage (F&B) related licensing.

It is highly appreciated that the Food and Environmental Hygiene Department (FEHD) and other governmental authorities have been dedicated to enhancing the business-friendliness of the regulatory regime for retailers and F&B operators. To further facilitate the business compliance, there are a few points that we would like to raise:

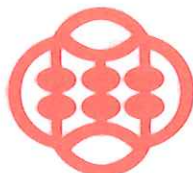
A. Related to Buildings Department (BD)

The stringent requirement for BA14 approval regarding the Provisional License will affect the commencement of stores, as there is no committed response time for BD's Addition and Alteration (A&A) inspection as well as the issuance of valid license.

B. Related to Liquor Licensing Board (LLB)

There is a gap in time and redundant procedure for the application of Liquor License during the transition period between Provisional License and Full License, hindering the business of liquor-selling operators.

The application for operating foyer bars/kiosks to serve alcoholic drinks for events at governmental venues such as Hong Kong Cultural Centre and City Hall should be considered special cases that follow different LLB requirements from those for Light Refreshment Restaurants, as the layout requirements for restrooms, fresh-air intake systems, etc., are non-applicable for above-mentioned operations.



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C. Related to FEHD (Food & Environmental Hygiene Department)

There is no committed response time for A&A applications, affecting the renovation planning for restaurant operators.

It is highly recommended to set up a special task force to handle and to accelerate the license transfer between the new and previous operators that provide all-year-round catering services, particularly for governmental sites, without interrupting the operations.

D. Related to OSA (Outside Seating Accommodation)

The current regulations for Light Refreshment Restaurants require the installation of fresh-air intake systems, which is technically impracticable for F&B operations located at open areas such as the central atrium.

We greatly appreciate the aim of the BFAC to reduce regulatory impact and compliance costs to business, and we are convinced that the BFAC is the ideal platform for the FEHD and relevant government departments to consult the retailers and F& B operators to review the subject matter. We believe only through close collaboration between government and business, we can sustain a business-friendly environment that benefits Hong Kong economy.

We look forward to your favourable reply.

Yours sincerely,

Thomson Cheng
Chairman

c.c. BFAC Secretariat
Hon Shiu Ka-fai
Secretary for Food and Health
Director of Buildings