

15 December 2023

To : ALL Authorized Persons
Registered Structural Engineers
Registered Geotechnical Engineers
Registered General Building Contractors
Registered Specialist Contractors

Dear Sir/Madam,

Qualified Supervision for Off-site Fabrication of Simple Structural Steel Elements

The use of simple structural steel elements is common in private development projects, such as cast-in embeds, brackets, balustrades, railings, support frames for air-conditioners and steel works that fall within the nature of works under the Minor Works Control System. Some of these simple structural steel elements are fabricated/produced in factories in the Mainland and delivered to the site for erection/installation.

2. Under item 6 in section 17(1) of the Buildings Ordinance, conditions will be imposed when approving the plans of a development project (approval conditions) requiring qualified supervision provided by the registered structural engineer (RSE) for the fabrication, erection and examination of the structural steel elements, including simple structural steel elements. In this connection, the RSE is required to assign a quality control supervisor (QCS) to supervise the works, including off-site fabrication, with the frequency of inspection by the QCS not less than once a week. The minimum qualifications and experience of the QCS are to be the same as the technically competent person (TCP) of grade T3 under the RSE's stream as stipulated in the Code of Practice (CoP) for Site Supervision 2009 (2021 Edition).

3. Having considered that a development project may involve numerous simple structural steel elements fabricated/produced in different factories in the Mainland and the genuine difficulties for the QCS to carry out inspections of these simple structural steel elements at frequency not less than once a week, the Buildings Department (BD) adopts a pragmatic and flexible approach and accepts on-site audit checks as an alternative to the inspections of simple structural steel elements by the QCS at the fabrication factories in the Mainland.

4. The on-site audit checks stated in paragraph 3 above should fulfill the following requirements:

- (a) The rate of sampling of the simple structural steel elements to be checked by QCS should be at least 5% with a minimum of five numbers of assemblies per every batch delivered to site;
- (b) The RSE should devise an audit check list covering but not limited to the following:
 - (i) size and dimension of steel elements and assemblies;
 - (ii) mill certificates of steel elements;
 - (iii) visual inspection and non-destructive testing of welds (if applicable) by a laboratory accredited under the Hong Kong Laboratory Accreditation Scheme;
 - (iv) size and quality of bolt connections; and
- (c) The date, time, items covered in the on-site audit check and audit check results should be clearly recorded in the log books by the QCS. The log books should be kept on site and, when required, produced to officers of BD for inspection.

5. RSE who intends to adopt the alternative arrangement of on-site audit checks for simple structural steel elements should submit one-month prior written notification to the Building Authority (BA). Proposal to adopt the alternative arrangement for other simple structural steel elements will be subject to individual considerations. RSE may submit one-month prior written application to the BA who will provide a determination within 14 days upon receipt of the application.

6. Save for the alternative arrangements applicable to simple structural steel elements as set out in paragraphs 3 to 4 above, all approval conditions and the quality control requirements stipulated in the CoP for the Structural Use of Steel 2011 (2023 Edition) should remain applicable to the simple structural steel elements.

Yours faithfully,



(AU YEUNG Hoi-pang)
Assistant Director / New Buildings 2
for Building Authority

c.c. The Real Estate Developers Association of Hong Kong