

**LETTERHEAD OF BUSINESS AND SERVICES PROMOTION UNIT
FINANCIAL SECRETARY'S OFFICE
GOVERNMENT SECRETARIAT**

Direct Line: 2921 8786

本署檔號 Our Ref: (44) in FSO/BSPU/3/1/2 Pt 2
來函檔號 Your Ref:

29 May 1998

Urban Services Department
45/F Queensway Government Offices
66 Queensway
Hong Kong

Fax:2530 1368

Attn:Senior Senior Staff Officer (Public Health) 2

Dear Sir,

**Public Consultation on Licensing Control of
Karaoke Establishments**

I am writing to offer our comments on the proposed licensing control from the helping business perspective.

We are responsible for taking forward the Helping Business Programme, of which elimination of over regulation and reduction of the cost of compliance are two major strands of work. That said, we are not against regulatory control. We believe that the Government has a duty to provide an appropriate regulatory regime to devise and oversee proper regulation in areas such as public safety, health etc. The key is to ensure that the Government does not create unnecessary red tape in achieving legitimate policy objectives, and the policy objectives must not be secured in a way that stifles business opportunities.

On this premise, we have the following observations on the proposed licensing control of Karaoke Establishments for your consideration -

- (a) there should be a clear statement of the policy objectives of the proposed licensing control;

- (b) there should be a full scale Regulatory Impact Assessment (RIA) by qualified professionals before the licensing regime is introduced;
- (c) a provisional licensing system similar to that comes under general restaurant licensing should be put in place;
- (d) consideration should be given to self-certification (or certification by APs and FSI contractors) leaving the licensing authority to focus on checking and prosecution of irregularities;
- (e) the consultation paper has not elaborated on Public Safety requirements that the Police will administer. We do not see the reason for consulting the Police on the suitability of an applicant in respect of each and every application;
- (f) Appendix III (Health Requirements) Item 4-we would suggest that Municipal Services Departments specify the ends instead of interfering with issues like construction materials; and
- (g) a layman's guide should be issued for reference by applicants/operators.

If you wish to discuss further on any of the above, please contact the undersigned on 2921 8786.

Yours faithfully,

(Mrs Brenda YIP)
for Director,
Business & Services Promotion Unit
Financial Secretary's Office