

**From:** [Harry LAI](#)  
**To:** [P.T. Comment Letter](#)  
**Cc:** [Eddy Lau](#)  
**Subject:** Comments on Exposure Draft HKFRS  
**Date:** Wednesday, 23 October 2024 6:33:25 pm  
**Attachments:** [image001.jpg](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.jpg](#)  
[image008.jpg](#)  
[image009.jpg](#)  
[image010.jpg](#)  
[image011.png](#)

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Dear Sir/Madam,

The Hong Kong Green Building Council would like to offer our comments on the Exposure Draft Hong Kong Financial Reporting Standard (HKFRS).

While we understand the HKICPA is proposing full convergence of HKFRS S1 and S2 (HKFRS Sustainability Disclosure Standards) with IFRS S1 and S2, the building-related standards quoted in S2 are mainly those used in the UK and the US. For Hong Kong companies, they may not be familiar with or using these overseas standards. It is understood that the standards that appear in the text mainly serve as examples, but in order to enhance the user-friendliness of the HKFRS, we suggest the HKICPA may, through FAQs, quote the local equivalents for Hong Kong companies' reference. Below are our suggestions for the local equivalents:

- (A) HKFRS p.48 clause 2 (sustainable building design and construction certifications), p.205 clause 5 (standards to assess and minimise environmental impacts of project siting, design and construction), p.208/223 clause 1.2 (third-party multi-attribute sustainability standards) – suggest to quote “BEAM Plus”, which is Hong Kong’s green building rating tools recognised by the Buildings Department and adopted by the local construction and real estate industries;
- (B) HKFRS p.244 clause 4.2 (third-party initiatives concerning green leases) – suggest to quote “HKGBC Green Tenancy Driver for Office Buildings”, which has been promoted in Hong Kong by us since 2014; and
- (C) HKFRS p.248 clause 1.1.1 (energy and sustainability services) – suggest to quote “BEAM Plus” and “HKGBC Zero-carbon-ready Building Certification”, which are building sustainability and energy-certification schemes operated by us in Hong Kong.

If you would like to learn more about the above schemes, you are welcome to visit our website [www.hkgbc.org.hk](http://www.hkgbc.org.hk) or contact us via our enquiry hotline on 3994 8888.

Your faithfully,



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