

# LICENSING OF FOOD PREMISES

## Executive Summary

1. The Food and Environmental Hygiene Department (FEHD) is the licensing authority of food premises and exercises control through its licensing regime, inspections and enforcement actions in accordance with the Public Health and Municipal Services Ordinance (Cap. 132) and its subsidiary legislations. Food businesses that are required to be licensed are classified into various types, such as general restaurant (use of any kind of cooking method for food preparation is allowed). FEHD also issues restricted food permits for sale of restricted foods (e.g. sushi and milk) including that for selling such foods online and permissions for outside seating accommodation (OSA) for open area used for alfresco dining business. As at 31 March 2023, there were 34,640 valid food business licences, 11,071 valid restricted food permits and 403 valid OSA permissions. The Environmental Hygiene Branch of FEHD is responsible for the licensing and regulatory control of food premises, under which the 3 Regional Licensing Offices (RLOs) are mainly responsible for processing applications for new food business licences and online sale of restricted food permits, and the 19 District Environmental Hygiene Offices (DEHOs) are mainly responsible for conducting inspections of licensed and unlicensed food premises and enforcing the Ordinance, and processing applications for other restricted food permits, and renewal and transfer of licences/permits. In 2022-23, the expenditure of the FEHD offices responsible for the work in licensing and regulatory control of food premises, among other duties, amounted to about \$497 million.

2. According to FEHD, the purpose of licensing food premises is to ensure that the premises are suitable for operating the food businesses, to safeguard public health and food safety, and to ensure the safety of patrons. Food business licences are only issued to food premises if they conform to the prescribed safety and hygiene standards laid down by the law, and comply with the government lease conditions, statutory plan restrictions and relevant licensing requirements. In 2022, FEHD received 10,227 applications for new food business licences and permits. FEHD mainly uses two information technology systems to support its work on licensing and regulatory control of food premises, namely the Licensing Management Information System (LMIS) that facilitates the processing of applications and administration of food business licences/permits issued, and provides statistical reports for management purposes, and the Online Licence Application Tracking Facility (ATF) that facilitates

## Executive Summary

---

applicants of food business licences to check the status of their applications through the Internet. The Audit Commission (Audit) has recently conducted a review of the work of FEHD on the licensing and regulatory control of food premises. The findings are contained in this Audit Report and another one titled “Regulatory control of food premises” (Chapter 6 of the Director of Audit’s Report No. 81).

### **Processing of applications for new food business licences and permits**

3. *Need to ensure that timeframes set for referrals of applications and processing revised layout plans are met.* In deciding the suitability of premises for food businesses for processing applications for food business licences/permits, FEHD will refer applications for food business licences to other relevant government bureaux/departments (B/Ds) for comments, e.g. the Buildings Department (BD) on building safety, the Fire Services Department (FSD) on fire safety and ventilation plan requirements and the Planning Department on compliance with statutory plan restrictions, etc. RLOs will also refer applications to DEHOs for comments in respect of the premises concerned. According to FEHD, the processing time for an application was mainly contingent upon the progress of the applicant’s compliance with the relevant licensing requirements, whether there were any revisions to the applications, and the time taken by other relevant B/Ds in providing comments to FEHD during the application process. The processing times from 2020 to 2022 were also affected by the coronavirus disease (COVID-19) epidemic during which both FEHD and the applicants faced difficulties in arranging compliance inspections or physical works. FEHD has stipulated in its guidelines and/or referral memoranda the timeframes for RLOs for referring the applications to other relevant B/Ds and DEHOs, as well as for the B/Ds and DEHOs for providing comments on the applications. Audit examined 50 applications for new food business licences received in 2021 and 2022 with long processing time (including 30 applications for restaurant licences and 20 applications for non-restaurant licences) and noted that:

- (a) the time taken in making the referrals to other relevant B/Ds and DEHOs had exceeded the stipulated timeframes. For example, for the 30 applications for restaurant licences, out of a total of 89 first referrals to other relevant B/Ds, the time taken in making 35 (39%) referrals had exceeded the stipulated timeframe (i.e. 3 working days) by 1 to 6 working days (averaging 2 working days); and

## Executive Summary

---

- (b) the applicants of the 50 applications made revisions to layout plans for 569 times, ranging from 3 to 37 times for each application (averaging 11 times). On 61 (11%) occasions, the processing of the revised plans was not completed within the specified timeframe. The delay ranged from 1 to 173 working days (averaging 17 working days) (paras. 1.11, 2.4, 2.7 to 2.10 and 2.37).

4. ***Need to take measures to ensure that comments are received timely for referred applications.*** There were delays in receiving comments from the relevant B/Ds and DEHOs for the 50 applications examined. For example, for first referrals to other relevant B/Ds, there were delays in 28 (31%) of the 89 referrals for restaurant licences and 15 (35%) of the 43 referrals for non-restaurant licences, ranging from 1 to 128 working days (averaging 19 working days). Upon enquiries with other relevant B/Ds, Audit was informed that the reasons for the delays in providing the comments to FEHD included the following:

- (a) ***Time lags in receiving referrals from and sending comments to FEHD.*** There were time lags between the dates of memoranda from FEHD and dates of receipt by other relevant B/Ds and vice versa. In some cases, FEHD did not receive the memoranda by the relevant B/Ds for the comments provided, or the relevant B/Ds did not receive FEHD's referral memoranda and were only made aware of the referrals upon receiving FEHD's reminders. On the other hand, FSD indicated that while FEHD had set a timeframe for FSD to provide comments (i.e. before the date of Application Vetting Panel (AVP) meeting (see para. 5) which was arranged within 20 working days of acceptance of application), FEHD had not taken into account the time that FSD would require for handling the cases, and the periods between the dates of FEHD's memoranda and the dates of AVP meetings varied among the referred cases;
- (b) ***Scope for improving referral mechanism.*** In one case, while the referral protocols state that applications for food factory licences with meat and pig roasting, and food premises installed with chimneys would be referred to the Environmental Protection Department, an application for a fresh provision shop licence without these features was referred to the department;
- (c) ***Time taken for clarifications and arrangement for inspections with applicants.*** The delays were partly due to the need of other relevant B/Ds to seek clarifications and/or additional information from the applicants,

## Executive Summary

---

and/or to arrange site inspections with the applicants, the timing of which was dependent on the availability of the applicants and the readiness of the premises for inspections. This process had been further delayed amid the COVID-19 epidemic; and

- (d) ***Impact of the COVID-19 epidemic.*** In 2021 and 2022, the time taken for providing comments on the referred applications was affected by the COVID-19 epidemic, during which there were special work arrangements, and deployment of staff to anti-epidemic operations. B/Ds had to prioritise their work and resulted in the longer time required to provide comments to FEHD.

While noting other relevant B/Ds' explanations, Audit noted that there was scope for improving the timeliness in providing comments by the B/Ds for processing food business licence applications (paras. 2.12, 2.13, 2.15 and 2.16).

5. ***Need to review AVP meeting arrangements.*** According to FEHD, an AVP meeting facilitates the applicant and/or his/her representative to understand the licensing requirements and conditions. Representatives from FEHD, BD and FSD will discuss with the applicant any problems identified and remedies required. It will be arranged within 20 working days of acceptance of the application. Audit examination revealed areas for improvement, including:

- (a) for the period 2018 to 2022, AVP meetings had been scheduled for 8,945 applications. However, only 75 (0.8%) meetings scheduled were convened;
- (b) Audit examination of 30 restaurant licence applications found that all the 30 AVP meetings scheduled were not convened, and there was no rescheduling of the meetings. According to FEHD, the meetings were not convened because the applicants did not attend the meetings; and
- (c) after all other relevant B/Ds have confirmed that the premises are suitable for licensing, FEHD will issue a letter of requirements (LOR) listing out the licensing requirements for issue of licence to the applicant at the AVP meeting. For all the 30 restaurant licence applications examined, LORs were dated after the scheduled AVP meetings (i.e. not available for issue at the scheduled meetings), ranging from 1 to 188 working days (averaging 52 working days) (paras. 2.16, 2.17 and 2.19).

## Executive Summary

---

6. ***Need to ensure that inspections to food premises are conducted in accordance with specified timeframes.*** Officers of FEHD conduct inspections to ensure that the premises are suitable for operating food businesses, namely first site inspections, progress inspections and final verification inspections. The timeframes for conducting inspections are stipulated in FEHD's guidelines. Audit examination of the 50 applications found that inspections were not always conducted according to the specified timeframes. For example, while first site inspection for restaurant licence applications should be conducted before AVP meetings, there were delays in 4 (13%) of the 30 applications, ranging from 11 to 81 working days. In addition, progress inspections were not conducted for some applications (paras. 2.25 and 2.26).

7. ***Need to improve reporting of processing time for new food business licences.*** According to FEHD, the processing time represents the number of working days from the date of first receipt of the application to the date of approval for issue of a full licence. In 2022, the average processing time for issuing different types of new full food business licences ranged from 138 (for frozen confection factory licences) to 217 working days (for factory canteen licences). According to FEHD, the processing time was calculated based on applications received and approved in the same year. Audit calculated the average processing times of full restaurant licence applications, including those completed in year(s) subsequent to the year of application and noted that it was 187 working days in 2022, compared to 173 working days as reported by FEHD. Audit also noted that there was no timeframe set on the overall processing times for most types of food business licences, and no regular reporting on the average processing time for issuing food business licences for monitoring purposes (paras. 2.34 to 2.36 and 2.38).

8. ***Need to enhance monitoring of processing of restricted food permit applications.*** According to FEHD, in 2022, the average processing times for issuing new restricted food permits ranged from 39 to 86 working days. Audit examined 10 applications for new restricted food permits received in 2021 and 2022 and noted that the timeframes for processing the applications stipulated in FEHD's guidelines were not always complied with. For example, while the case manager should inspect the premises within a specified timeframe upon receipt of notification of compliance, in 5 (71%) of the 7 applications for restricted food permits (other than online sale of restricted food permits), there were delays in conducting the inspections, ranging from 4 to 20 working days (averaging 8 working days) (paras. 2.34 and 2.42).

## Executive Summary

---

9. *Need to ensure that timeframes set for processing OSA permission applications are met.* According to FEHD, for the period 2018 to 2022, the average processing times for approving new OSA permissions ranged from 15 to 23 months for inclusion of OSA into existing licensed premises, and from 9 to 19 months for applications made concurrently with new restaurant licences. Audit examined 10 applications (including 9 applications for inclusion of OSA into existing licensed premises) for OSA permissions and noted that:

- (a) according to FEHD, for applications for inclusion of OSA permissions into existing licensed premises, the time required for handling a simple and straight forward application is 46 working days. For the 9 applications examined, the time taken to process each application ranged from 84 to 341 working days (averaging 160 working days), i.e. 38 to 295 working days (averaging 114 working days) more than the 46-day timeframe; and
- (b) a timeframe of 20 working days is set for receiving comments from other relevant B/Ds on applications for inclusion of OSA permissions into existing licensed premises. However, the time taken in all 9 applications exceeded this 20-day timeframe by a range of 51 to 195 working days (averaging 104 working days). Upon enquiry with other relevant B/Ds, the reasons for the delays include time lags in receiving referrals from and/or sending comments to FEHD (see para. 4), longer time taken to obtain relevant information and clarify with applicants for more complicated cases or miscommunication between B/Ds, and impact of the outbreak of the COVID-19 epidemic. While noting other relevant B/Ds' explanations, Audit noted that there was scope for improving the timeliness in providing comments by the B/Ds to FEHD for processing applications for OSA permissions (paras. 2.44 to 2.46 and 2.50).

10. *Room for improvement in handling local consultations.* For OSA permission applications, after receiving objections raised by the public or other relevant B/Ds, FEHD informs the applicants of the matters and allows the applicants to submit remedial proposals if applicable. Further local consultation may be conducted after the revision of the applications. For the 10 applications examined, FEHD took 1 to 134 working days (averaging 39 working days) to inform the applicants of the objections received, and 1 to 47 working days (averaging 19 working days) to refer the applications to the department concerned for conducting further local consultations (para. 2.47).

## Executive Summary

---

### Management of food business licences and permits

11. *Need to improve reporting of processing time for food business licence/permit transfer applications.* Transfer of food business licences/permits are processed by DEHOs. According to FEHD, the average processing time for transfer applications for restaurant licences in 2022 was about 39 working days. Audit noted that:

- (a) the average processing time of 39 working days was calculated based on applications received and approved in the same year only; and
- (b) Audit examination of the records of 30 applications for food business licence/permit transfer received in the period from 2018 to 2023 (up to January) recorded in LMIS revealed that 7 (23%) were wrongly classified as transfer cases. For 4 (13%) applications, the processing time data was incomplete or inaccurate (paras. 3.2, 3.5 and 3.7).

12. *Need to enhance monitoring of processing of food business licence/permit transfer applications.* Of the 30 food business licence/permit transfer applications examined by Audit (see para. 11), Audit further examined the case with the longest processing time (i.e. 784 working days for an application for transfer of a frozen confection restricted food permit for a premises at a petrol filling station) and found areas for improvement, including:

- (a) *Long time taken in issuing letter of response.* While FEHD has set a performance pledge for issuing a letter of response within 9 working days for transfer of licences, no performance pledge is set for transfer of permits. The time elapsed from the date of application to the issue of the letter of response to the applicant was 21 working days, i.e. exceeding the performance pledge set for transfer of licence by 12 working days;
- (b) *Need to send referrals to other relevant B/Ds and request for information from applicant timely.* The application was referred to two B/Ds (i.e. FSD and the Lands Department) for comments about 1 month after the receipt of the application. Upon receiving the referral, FSD indicated that additional information was needed. The DEHO issued a letter to the applicant on 25 February 2019 to request for additional information, about 5 months after receiving the reply from FSD, and another letter again on 15 November 2019;

## Executive Summary

---

- (c) ***Delay in seeking approval.*** According to FEHD's guidelines for processing transfer applications, the case manager conducts an interview with the transferor and proposed transferee, and reports the interview results and recommends to the Senior Health Inspector and the Chief Health Inspector for approving or rejecting the application. In the case concerned, the case manager reported the interview results and the recommendation for approving the transfer application about 15 months after the interview. Audit noted that there was no timeframe set for the submission of interview results for seeking approval for transfer applications; and
- (d) ***Different understanding on referral mechanism.*** According to FEHD's guidelines, for applications for transfer of food business licences/permits for premises at petrol filling stations, referral to FSD and the Lands Department for comments is not required. However, according to FSD, a referral mechanism had been established with FEHD since May 2017 such that all applications (i.e. new, renewal, alteration and transfer applications included) for food business licences/permits for premises at petrol filling stations should be referred to FSD for detailed risk assessment. Upon enquiry, FEHD informed Audit in October 2023 that, taking into account FSD's comments, all applications for food business licences/permits for premises at petrol filling stations (inclusive of transfer and renewal applications) would be referred to FSD with immediate effect. (paras. 3.2, 3.9 to 3.11).
13. ***Need to enhance renewal procedures for food business licences/permits.*** A full food business licence is valid for 12 months and renewable, subject to no cancellation or revocation as a result of accumulation of demerit points or breaches of licensing requirements and/or conditions. According to FEHD, food business licensees/permittees are required to submit identity proofs on application for renewal. A corporate licensee/permittee is required to submit a photocopy of the certificate of incorporation as supporting documents (in addition to the photocopy of identity document of the authorised person). There is no requirement for documents proving the validity of its corporate status (e.g. latest business registration). Audit noted a case in which a corporate licensee was dissolved at the time of licence renewal and therefore not eligible to hold the licence, but managed to successfully renew the licence (paras. 3.14 and 3.15).

## Executive Summary

---

14. ***Room for improvement in handling conversion of provisional food business licences to full licences.*** FEHD operates a provisional licensing system to enable applicants to operate food businesses on a provisional basis pending the issue of a full licence. A provisional food business licence is valid for 6 months. Prior to 1 March 2023, the maximum time allowed for licensees of provisional licences to comply with all the licensing requirements for the issue of full licences (referred to as the grace period) was 6 months after the expiry of the provisional licences. The application is deemed withdrawn after the grace period, unless the licensee can demonstrate that the delay in meeting the licensing requirements is due to factors beyond his/her reasonable control. Audit examined 48 new full food business licence applications with provisional licences issued and found that in 12 (25%) applications, the grace period for conversion from provisional food business licences to full licences had been extended but there was no documentation on the justifications (paras. 3.21, 3.26 and 3.27).

15. ***Need to improve performance reporting relating to licensing of food premises.*** FEHD has set performance targets on licensing of food premises in the Controlling Officer's Report. In addition, it publishes performance pledges on processing applications for food business licences and OSA permissions on its website. According to FEHD, all the performance targets and pledges set for food business licensing were met in 2018 to 2022. However, Audit noted inadequacies in the reporting process, including:

- (a) Audit examination of 50 applications for new food business licences and 10 applications for new OSA permissions revealed instances where the performance measures were not achieved but FEHD reported an achievement of 100% in its Controlling Officer's Report or website. For example, first site inspections were not conducted in 6 (30%) of 20 applications for non-restaurant licences within 7 working days of acceptance of the applications;
- (b) in reporting the achievement of the performance measure of "holding of AVP meeting for restaurant licences within 20 working days from passing of initial screening for 99% of applications" in FEHD's Controlling Officer's Report, AVP meetings scheduled but not convened (see para. 5(a)) were counted as meeting the target; and
- (c) FEHD's performance reporting process involved a lot of manual procedures. It was time consuming, prone to errors and resource intensive (paras. 3.31 to 3.34).

## Executive Summary

---

16. *Need to review performance measures for processing food business licences/permits.* Currently, all the performance measures published by FEHD are on processing applications for full or provisional food business licences but not for restricted food permits. Based on the information provided by FEHD, for the period 2018 to 2022, the average processing times of issuing different types of restricted food permits ranged from 33 to 136 working days, and that some of the processing times were comparable to those of licences (e.g. in 2022, 61 working days for provisional general restaurant licences) (para. 3.36).

### Other related issues

17. *Need to keep under review the use of composite food shop licence.* Composite food shop licence was introduced in August 2010 with a view to giving flexibility to sell and/or prepare various specified types of simple or ready-to-eat foods that do not involve complicated preparation (e.g. coffee/tea and sandwich) for consumption off the licensed premises. In the Legislative Council brief of May 2010, it was assumed that about 110 food shops would apply for the composite food shop licences if the trade considered it more user-friendly. Audit noted that up to June 2023, there were only 39 applications. As of June 2023, there was only one food premises holding this licence (paras. 4.5 and 4.6).

18. *Need to promote online payment service and electronic application service and extend coverage of the services as scheduled.* For new issue of full food business licences/permits, fees for licences/permits can be paid online since 2016. Audit noted that the usage of the online payment service for the period 2018 to 2022 had been on the low side, accounting for less than 2% of licence/permit payment transactions each year. Furthermore, as of June 2023, online payment service was not available for new issue of provisional licences, and transfer and renewal of food business licences/permits. According to FEHD, it planned to extend the online payment service to all payment of fees related to food business licences/permits by the second quarter of 2024. As regards electronic submission of applications for food business licences/permits, as of August 2023, electronic application service did not apply to renewal applications for food business licences/permits. According to FEHD, it planned to launch an online platform for food business licences/permits renewal applications by the end of 2023 (paras. 4.12, 4.13 and 4.16).

## Executive Summary

---

19. *Need to enhance application tracking functions of ATF.* FEHD introduced ATF in 2008 to facilitate applicants of food business licences to check the status of their applications through the Internet. In March 2015, FEHD enhanced ATF to cover OSA permission applications. As of June 2023, ATF did not cover applications for temporary food factory licences and restricted food permits. Given that the average processing times for applications for restricted food permits could be up to 3 months, there are merits to consider extending ATF to all types of food business licence/permit applications (paras. 4.18 and 4.19).

20. *Need to set implementation schedule for electronic-referral system.* The processing of food business licence/permit applications involves referrals to other relevant B/Ds for comments (see para. 3). In 2019, to save manpower and transport expenditure, FEHD planned to implement an electronic application referral system (i.e. electronic-referral system) to transform all new applications for food business licences received by FEHD into soft copies and transmit to other relevant B/Ds for follow-up actions through electronic-memorandum. According to FEHD, with the implementation of LMIS 2 in May 2023, FEHD had already launched data interfaces with two B/Ds through the electronic-referral system in processing applications for some types of licences (e.g. general restaurant licences). The data interface with another department through the system was expected to be launched by 2026, and data interfaces with other relevant B/Ds were pending consultation on the system capabilities of respective B/Ds (paras. 4.20 and 4.21).

### Audit recommendations

21. **Audit recommendations are made in the respective sections of this Audit Report. Only the key ones are highlighted in this Executive Summary. Audit has recommended that the Director of Food and Environmental Hygiene should:**

#### *Processing of applications for new food business licences and permits*

- (a) **take measures to ensure timely referrals of food business licence applications to other relevant B/Ds and DEHOs for comments and revised layout plans are processed in a timely manner (para. 2.30(a) and (b));**

## Executive Summary

---

- (b) take measures to improve collaboration with other relevant B/Ds and among FEHD's offices in processing of food business licence applications, including sending reminders to other relevant B/Ds and FEHD's responsible offices in a timely manner, taking measures to reduce the time lags in sending referrals to and receiving comments from other relevant B/Ds, and encouraging other relevant B/Ds to use the electronic-referral system (para. 2.30(c));
- (c) take measures to improve the referral mechanism for processing food business licence applications, including avoiding making referrals to other B/Ds unnecessarily, and taking into account the operational needs of FEHD and other relevant B/Ds in stipulating the timeframes for providing comments on licence applications in FEHD's guidelines (para. 2.30(d));
- (d) review the AVP meeting arrangements and take measures to ensure that AVP meetings not convened are rescheduled as appropriate (para. 2.30(e));
- (e) take measures to ensure that inspections for checking the suitability of the premises for operating food businesses are conducted in accordance with the timeframes set out in FEHD's guidelines (para. 2.30(g));
- (f) compile management information on the processing time for food business licence/permit applications regularly and ensure that the processing time of all applications are monitored (para. 2.40(a));
- (g) monitor the processing times for food business licence/permit applications, in particular cases with longer processing times with a view to formulating measures to expedite the process as far as practicable (para. 2.40(b));
- (h) enhance monitoring of the compliance with the timeframes set out in FEHD's guidelines for processing applications for restricted food permits (para. 2.51(a));
- (i) take measures to ensure that the timeframes stipulated in FEHD's guidelines for processing OSA permission applications are met, and document the justifications for not meeting the timeframes, and

## Executive Summary

---

improve the coordination with other relevant B/Ds in processing OSA permission applications (para. 2.51(c) and (e));

- (j) take measures to expedite the process of informing applicants of OSA permission applications of the objections received and referring the applications to other relevant B/Ds for conducting further local consultations (para. 2.51(d));

### *Management of food business licences and permits*

- (k) ensure that all applications are included in the calculation of processing time of food business licence/permit transfer applications, and take measures to improve the accuracy of the information on food business licence/permit transfer applications in LMIS (para. 3.12(a) and (b));
- (l) take measures to ensure that food business licence/permit transfer applications are processed in a timely manner (para. 3.12(c));
- (m) consider setting a timeframe for the submission of interview results for seeking approval for food business licence/permit transfer applications in FEHD's guidelines (para. 3.12(d));
- (n) update FEHD's guidelines according to the agreed referral mechanism with other relevant B/Ds for processing food business licence/permit transfer applications involving petrol filling stations, and take measures to ensure compliance with the guidelines (para. 3.12(e));
- (o) enhance the renewal procedures for food business licences/permits to ensure that only eligible applicants can renew their licences/permits (para. 3.19(a));
- (p) take measures to ensure that the justifications for extending the grace period for conversion from provisional food business licences to full licences are documented (para. 3.29(b));
- (q) take measures to improve the procedures in reporting FEHD's performance on processing food business licence/permit applications, including exploring the use of technology to facilitate the reporting

## Executive Summary

---

process and enhancing data checking procedures so as to ensure that the achievement of performance measures is accurately reported (para. 3.37(a));

- (r) consider reviewing the reporting basis of the performance measures for AVP meetings and issue of food business licence in FEHD's Controlling Officer's Report and take follow-up actions as appropriate (para. 3.37(b));
- (s) review FEHD's performance measures for processing food business licence/permit applications, including the need for setting target processing time for restricted food permits and taking follow-up actions as appropriate (para. 3.37(c));

### *Other related issues*

- (t) conduct a review on composite food shop licence and take follow-up actions as appropriate (para. 4.10(b));
- (u) take measures to promote the online payment service and further promote the electronic application service for food business licences/permits, and ensure that the services are extended to all payment of fees and all types of food business licence/permit applications as scheduled (para. 4.23(a) and (b));
- (v) consider extending ATF to all types of food business licence/permit applications (para. 4.23(c)); and
- (w) set an implementation schedule for the electronic-referral system after consulting the B/Ds concerned and monitor the progress to ensure its timely completion (para. 4.23(d)).

22. Audit has *recommended* that the Secretary for Housing, the Director of Buildings, the Director of Drainage Services, the Director of Electrical and Mechanical Services, the Director of Environmental Protection, the Director of Fire Services, the Commissioner for Labour, the Director of Lands and the Director of Planning should take measures to ensure that

## Executive Summary

---

comments are provided to FEHD for processing food business licence applications in a timely manner (e.g. consider using the electronic-referral system) (para. 2.31).

23. **Audit has *recommended* that the Director of Buildings, the Director of Home Affairs, the Director of Planning and the Commissioner for Transport should take measures to ensure that comments are provided to FEHD in a timely manner for processing OSA permission applications (para. 2.52).**

### Response from the Government

24. The Director of Food and Environmental Hygiene, the Secretary for Housing, the Director of Buildings, the Director of Drainage Services, the Director of Electrical and Mechanical Services, the Director of Environmental Protection, the Director of Fire Services, the Director of Home Affairs, the Commissioner for Labour, the Director of Lands, the Director of Planning, and the Commissioner for Transport generally agree with the audit recommendations.

