

CHAPTER 6

**Environment and Ecology Bureau
Food and Environmental Hygiene Department**

Street cleansing services

**Audit Commission
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Report No. 84 of the Director of Audit contains 8 Chapters which are available on our website (<https://www.aud.gov.hk>).



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STREET CLEANSING SERVICES

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STREET CLEANSING SERVICES

Executive Summary

1. Street cleanliness is an integral part of environmental hygiene and public health. It can reduce disease transmission and help curb rodent infestation, as well as create a favourable cityscape to enable citizens to enjoy an improved quality of life. The Food and Environmental Hygiene Department (FEHD) is responsible for providing quality environmental hygiene services and facilities and safeguarding public health. The core duties include monitoring of street cleansing service delivery as well as carrying out enforcement actions against illegal disposal of refuse under the relevant Ordinances.

2. According to FEHD, its street cleansing services mainly include street sweeping services, street washing services, gully cleansing services and poster removal services (including the removal of illegal bills and posters). Street cleansing services are delivered by FEHD's staff (i.e. in-house) as well as by contractors (i.e. outsourced). The outsourcing policy aims at greater cost-effectiveness and flexibility in the delivery of services. As at 30 September 2024, the total workforce was about 13,200 (comprising about 3,000 in-house staff and about 10,200 contractors' staff) and about 82% of the street cleansing services were outsourced. In 2023-24, the expenditure for street cleansing and related services amounted to about \$5.1 billion. FEHD did not maintain a separate breakdown of the expenditure on street cleansing services. The Audit Commission (Audit) has recently conducted a review of the work of FEHD on street cleansing services.

Monitoring of service delivery

3. *Need to enhance checking on daily attendance records submitted by contractors.* As at 30 September 2024, FEHD had 42 street cleansing service contracts (each with a duration of three years) with a total contract value of \$7.62 billion. According to the street cleansing service contracts, contractors are required to provide stipulated minimum numbers and types of contractor personnel and ensure their full attendance, and submit daily attendance records to FEHD for checking. For example, for street sweeping services, each workman is allocated with

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a length of road (hereinafter referred to as a beat) within a work shift and each work shift shall be attended by a workman. Audit visited 3 District Environmental Hygiene Offices (DEHOs) (out of 19 DEHOs) and examined their daily attendance records for outsourced street cleansing services in December 2023 and September 2024. Audit found that the attendance requirement of contractors' staff was not fully met in some days for street sweeping, gully cleansing and poster removal services. For example, in December 2023, in 7 of 9,300, 1 of 7,936 and 3 of 8,401 work shifts for street sweeping services, the attendances of contractors' workmen of the three DEHOs were not indicated in the records. Upon enquiry, FEHD informed Audit in March 2025 that, based on the contractors' attendance books which were provided to FEHD upon request, all the work shifts were actually attended by contractors' workmen and provided with the stipulated minimum number of contractor personnel, but the daily attendance records submitted by the contractors concerned to FEHD were inaccurate and these attendances were not reflected. In this connection, Audit noted that Senior Foremen of FEHD had reviewed the daily attendance records submitted by the contractors concerned (paras. 1.9, 1.14, 2.2, 2.4 to 2.7).

4. *Need to enhance compliances with requirements on conducting self-discipline quality inspections for outsourced street cleansing services.* FEHD guidelines stipulate that Health Inspectors shall assign each inspection team of contractor to conduct at least two self-discipline quality inspections per week and cover two tasks for each inspection to monitor the street cleansing services delivered by their workmen. Audit examined the inspection records of contractors' inspection teams for outsourced street cleansing services of the three DEHOs (see para. 3) for September 2024 and found that for one DEHO (involving 9 inspection teams): (a) 4 inspection teams carried out only one task in each self-discipline quality inspection; and (b) the other 5 inspection teams did not conduct any self-discipline quality inspection in one week and only conducted one self-discipline quality inspection each in another two weeks. In this connection, Audit noted that the Health Inspectors concerned had not assigned tasks/the required number of tasks to the contractors' inspection teams for conducting the self-discipline quality inspections for the period (paras. 2.8 and 2.9).

5. *Need to conduct monitoring inspections as well as submit and review monitoring inspection reports for outsourced street cleansing services in accordance with stipulated frequencies, timeframes and coverage.* Apart from contractors' self-discipline quality inspections, FEHD conducts monitoring inspections under a multi-tier monitoring mechanism (comprising daily inspections, formal inspections, assigned risk-based surprise inspections, supervisory checks and systematic

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inspections) to monitor outsourced street cleansing services. According to FEHD guidelines, each district is divided into 12 cleansing sectors by making reference to the existing boundary areas of the supervisory staff of district cleansing sections and the distribution/percentage of the outsourced areas and in-house areas. Audit examined the monitoring inspection records of the three DEHOs (see para. 3) for outsourced street cleansing services and noted that:

- (a) some monitoring inspections were not conducted in accordance with the frequencies and coverage stipulated in FEHD guidelines. For example, in the period from 1 to 14 September 2024: (i) for two DEHOs, 5 (2%) of 210 and 21 (12%) of 182 daily inspections did not cover the required beats (against the requirement of covering at least 10% of the cleansing sector each working day); and (ii) for one DEHO, there was no documentation showing that 6 (2%) of 271 beats were covered in daily inspections (against the requirement of covering the whole cleansing sector (i.e. every beat) once every 10 working days); and
- (b) the monitoring inspection reports were not always submitted and reviewed in accordance with the timeframes stipulated in FEHD guidelines in the period from January 2023 to September 2024. The delays ranged from 1 to 10 working days (paras. 1.9, 2.3, 2.10 to 2.12).

6. ***Room for improvement in handling contractors' non-compliances with contract terms.*** Under the street cleansing service contracts, warnings (verbal/written) and/or default notices will be issued to contractors for breach of contract terms. According to FEHD, in tender assessment exercises of street cleansing service contracts, the evaluation will take into account the number of default notices and demerit points (e.g. a demerit point is given to the contractor for each employment-related default notice issued in respect of wages) issued to the contractors submitting the tenders, which has created a deterrent effect (paras. 2.14 and 2.17). Audit noted the following issues:

- (a) ***Need to issue warning letters and default notices in accordance with stipulated timeframe.*** According to FEHD guidelines, all warning letters/default notices should be delivered to contractors as soon as possible and be completed within 7 working days after the discovery of the breaches. Audit examination of the warning letters and default notices issued by FEHD to contractors of 19 DEHOs in the period from January 2019 to September 2024 found that FEHD did not maintain readily available

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information on the delivery dates of warning letters/default notices. The time lags between the identification of non-compliances and issuance of the warning letters/default notices had exceeded 7 working days for 230 (66%) of 351 warning letters and 2,103 (54%) of 3,870 default notices to the contractors (para. 2.15); and

- (b) ***Need to review effect of FEHD's measures regarding past performance of contractors on future tender assessment exercises.*** Audit examination of the latest completed street cleansing service contracts for 19 DEHOs as of September 2024 (involving a total of 38 contracts) noted that the total number of default notices issued was 35 on average (ranging from 2 to 179) for each contract. Among these 38 contracts, Audit examination of 10 contracts with the largest number of default notices issued revealed that each of the 10 contracts was issued 74 (ranging from 45 to 179) default notices on average. Audit also noted that as of September 2024, scores of 7 and 15 (out of 100) technical marks were allocated for contractors' demerit point records and past performance records respectively in the tendering exercises of street cleansing service contracts and there was room for further adjusting the relevant scores (paras. 2.17 to 2.19).

7. ***Room for improvement in delivering in-house street cleansing services.*** Audit examined the records of the three DEHOs (see para. 3) for in-house street cleansing services in December 2023 and September 2024, and noted that:

- (a) for street sweeping services: (i) workmen of two and one DEHOs were absent for some work shifts in December 2023 and September 2024 respectively (e.g. 31 (1%) of 3,100 work shifts for a DEHO in December 2023); and (ii) for two DEHOs, some workmen were assigned to provide street sweeping services in more than one beat within a work shift (e.g. 121 (14%) of 837 work shifts for a DEHO in December 2023). As the duties of each workman concerned would be thinned out, the street sweeping services were not provided at a frequency as planned; and
- (b) for street washing services, street washing vehicles were not deployed as planned or their operation was temporarily suspended in some work shifts (e.g. 33 (53%) of 62 work shifts and 4 (17%) of 24 work shifts in December 2023 respectively) for two DEHOs (para. 2.22).

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8. ***Room for improvement in conducting monitoring inspections as well as submitting and reviewing monitoring inspection reports for in-house street cleansing services.*** Audit examined the monitoring inspection records of the three DEHOs (see para. 3) for in-house street cleansing services and noted that:

- (a) some monitoring inspections were not conducted in accordance with the frequencies and coverage stipulated in FEHD guidelines. For example, for Foremen's daily inspection, in the period from 1 to 14 September 2024 (comprising seven rounds), of 10 beats of each of the three DEHOs examined by Audit, the stipulated frequency and coverage (i.e. alternate days to every beat) was not met in most (i.e. five to seven) rounds of inspections for the three DEHOs. Besides, the monitoring inspection reports were not always submitted and reviewed in accordance with the timeframes stipulated in FEHD guidelines in the period from January 2023 to September 2024. The delays ranged from 1 to 17 working days; and
- (b) FEHD guidelines stipulate that Overseers may carry out random and surprise checks on the daily inspection work performed by Foremen under their purview and management of DEHOs should ensure a cycle of the inspection to all services to be taken within a reasonable period of time. However, in the period from January 2023 to December 2024, the numbers of Overseers' daily inspections varied among the three DEHOs, ranging from 152 to 556. Furthermore, 150 daily inspections were not recorded by one DEHO in the E-Management System for In-house Cleansing Services and Pest Control Services (EMS) as required. Besides, no reports were submitted for the 150 daily inspections and 796 reports were reviewed 1 to 519 working days (averaging 43 working days) after the Overseers' daily inspections. However, no timeframe was set in FEHD guidelines in this regard (paras. 2.3, 2.24 to 2.26, 2.28 and 2.29).

9. ***Need to keep under review provision of in-house street cleansing services.*** According to FEHD, the percentage of in-house street cleansing services slightly decreased from 19% as at 31 December 2019 to 18% as at 30 September 2024. In view of variance in such percentages among 19 DEHOs (ranging from 5% to 37% as of September 2024), higher percentage of work shifts in which in-house workmen were absent (see para. 7(a)) as compared to contractors' workmen (see para. 3) and a high vacancy rate of in-house workmen (i.e. a shortage of 283 (13%) workmen as of September 2024), FEHD needs to keep under review the provision of in-house street

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cleansing services and take follow-up actions as appropriate (paras. 2.33, 2.34 and 2.37).

Tackling illegal disposal of refuse

10. *Scope for improvement in monitoring work programs of Dedicated Enforcement Teams (DETs).* FEHD carries out enforcement actions against people committing public cleanliness offences. Under the Fixed Penalty (Public Cleanliness and Obstruction) Ordinance (Cap. 570), FEHD may issue Fixed Penalty Notices (FPNs) for specified public cleanliness offences (e.g. littering in public places). FEHD may also institute prosecution by way of summons against the offenders. Since 2017, FEHD has set up DETs to step up enforcement actions against various public cleanliness offences. DET members perform enforcement duties in plain clothes and are deployed to various littering black spots. According to FEHD, the work programs set out the work covered by DETs. However, FEHD had not specified in its guidelines the information to be included in the work programs. Audit visited three DEHOs to review the work of DETs and noted the following issues:

- (a) *Number of locations included in DETs' work programs varied significantly among DEHOs with similar number of DETs.* Audit examined the work programs for 2024 (up to October) and noted that while the number of DETs under the purview of the three DEHOs was similar (i.e. 5 to 6 DETs as of October 2024), the average number of locations selected for conducting daily inspection by DETs as shown in their work programs varied significantly (i.e. 2, 22 and 58 locations); and
- (b) *Need to enhance documentation of work performed by DETs for monitoring compliance with work programs.* For the three DEHOs, Audit noted that the documentation of the work performed by DETs varied (e.g. the time of inspection was recorded by two DEHOs but not by one DEHO) and there was no documentation showing that the locations inspected were compared against those in the work programs of DETs for monitoring compliance (paras. 1.12 and 3.6).

11. *Scope for improving situation reports.* According to FEHD guidelines, records on locations with littering activities and actions taken to tackle the problem should be properly recorded in a Situation Report on Handling of Locations with Littering Activities by DET (hereinafter referred to as situation report). The criteria

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for including locations with littering activities (in the past three months) in the situation report include identified top five hotspots under the Complaint Management Information System (CMIS) and frequent littering/illegal dumping activities reported at the locations. For the three DEHOs (see para. 10), Audit examined the situation reports for October 2024 and noted the following issues:

- (a) ***Some hotspots not included in situation reports.*** While 39 locations were identified as the top five hotspots in CMIS reports in the period from July to September 2024 (i.e. with littering activities in the past three months), 32 (82%) locations were not included in the situation reports for monitoring by DETs;
 - (b) ***Need to consider including locations with frequent littering activities detected by Internet Protocol (IP) cameras in situation reports.*** While 49 locations were detected by IP cameras (see para. 13) with illegal disposal of refuse in the period from July to September 2024, 39 (80%) locations were not included in the situation reports. In particular, 8 (21%) of the 39 locations had been reported with illegal disposal of refuse activities for over 500 to 2,141 times (averaging 1,170 times) in the three-month period; and
 - (c) ***Need to review actions needed at locations included in situation reports for a long time.*** Audit noted that 37 locations had been included in the situation reports of the three DEHOs for a long time, ranging from about 1.5 years to about 7.3 years (averaging about 3.6 years) in spite of the fact that 2 to 62 (averaging 6) blitz operations had been organised in the period from July to September 2024 for each location (paras. 3.5 and 3.8).
12. ***Need to review operations of DETs.*** DETs had been set up for more than 7 years and the number of DET members increased by about 34% from 158 in 2020 to 211 in 2024. Audit noted that the penalty levels of FPNs had increased since 22 October 2023, and the average number of FPNs issued by each DET member and the number of black spots of refuse dumping dealt with by DETs decreased generally from 2020 to 2024. On the other hand, the work programs of DETs varied among different DEHOs. As of February 2025, no documentation was available showing that an evaluation on operations of DETs had been conducted (para. 3.12).

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13. ***Need to enhance monitoring of deployment of IP cameras.*** FEHD has installed IP cameras at illegal refuse deposit black spots to curb the illegal deposits of refuse in public places. According to FEHD guidelines, based on the footage captured by IP cameras, districts can analyse the timing and patterns of the illegal acts to formulate more effective enforcement operations and take prosecution action against registered owners of vehicles or relevant offenders. Districts should periodically review the target locations for installation of IP cameras and relocation of the IP cameras to new target locations should be strategically considered. The number of locations installed with IP cameras was 470 as of December 2024. For the deployment of IP cameras by the three DEHOs (see para. 10), Audit noted the following issues:

- (a) ***Need to review locations installed with operating IP cameras but with no or few FPNs or summons issued.*** As of December 2024, 45 locations had been installed with operating IP cameras for more than six months. In the period from 2022 to 2024, for 7 (16%) locations, no FPN or summons was issued (the operating period of the IP cameras ranged from 10 months to about 2.8 years, averaging about 1.8 years); and
- (b) ***Some illegal refuse deposit black spots not installed with operating IP cameras.*** As of October 2024, of the 37 locations included in the situation reports of the three DEHOs for a long time (ranging from about 1.5 years to about 7.3 years), 23 (62%) locations had not been installed with operating IP cameras (paras. 3.13 and 3.14).

14. ***Scope for improving environmental hygiene of problematic spots.*** Audit conducted three site visits to 10 locations with environmental hygiene problems (hereinafter referred to as problematic spots) under the purview of the three DEHOs (see para. 10) in the period from December 2024 to February 2025, and noted the following issues:

- (a) ***Environmental hygiene problems found in some problematic spots and their adjacent areas.*** For 2 (20%) problematic spots, Audit found environmental hygiene problems at the locations during the three site visits. For other 2 (20%) problematic spots, while environmental hygiene problems were not always found at the spots, the problems were found in areas adjacent to the problematic spots during the three site visits; and

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- (b) ***Scope for enhancing actions against obstruction to cleansing operations.*** For any article obstructing or likely obstructing any cleansing operations, FEHD may serve the owner of such article or attach to such article a notice requiring removal within four hours after the notice is served or attached. For the 4 locations with environmental hygiene problems (see (a) above), Audit noted that no notice for removal of obstruction was attached to the articles in all three site visits. According to FEHD, the styrofoam boxes or carton boxes accumulated at the 4 locations were not waste, but were recyclable or reusable, and it would step up street cleansing services at locations with active recycling activities and carefully balance the need to facilitate recycling activities and upkeep environmental hygiene in public places in consultation with relevant departments (paras. 3.17 to 3.21).

Other related issues

15. ***Need to enhance reporting mechanism of performance measures on street cleansing services.*** FEHD has set performance measures in its Controlling Officer's Report (COR) and on its website. According to FEHD, DEHOs shall submit returns for the performance measures through the Environmental Hygiene Statistical Information System (EHSIS) and all the performance measures were met in 2019 to 2023. Audit examined the returns submitted by DEHOs and found that:

- (a) ***Street sweeping services.*** Regarding the reporting of the performance measure in COR (i.e. "completion of first round street sweeping services on main roads before 9:00 a.m. to ensure removal of over-night street litter"), some information in 47 (4%) of 1,140 returns was not available in the period from 2019 to 2023. Based on the information reported in 19 DEHOs' returns, the achievement of 100% of the performance measure could not be ascertained; and
- (b) ***Street washing services.*** Regarding the reporting of the performance measure "to wash streets on a need basis, at least once a week in busy areas, and at least 2 times weekly in problematic areas/black spots" on FEHD's website, the returns only required the reporting of achievement of washing streets at least once a week (i.e. the achievement of washing streets "on a need basis" and "at least 2 times weekly" was not required to be reported). Based on the information reported in 19 DEHOs' returns in the period from 2019 to 2023, the achievement of 100% of the performance measure could not be ascertained. Audit further examined the records of

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the three DEHOs (see para. 3) and noted that the number of streets to be washed at least once a week stated in the returns submitted by one DEHO was different from those in the list of busy areas maintained by the DEHO concerned (paras. 4.2 to 4.4 and 4.7).

16. ***Need to enhance management information for monitoring street cleansing services.*** Audit noted non-compliances with contracts by outsourced contractors and inadequacies in FEHD's monitoring of street cleansing services (e.g. compliance with staff attendance requirement for street cleansing services and compliance with the work programs of DETs). In this connection, some management information (e.g. highlights or summaries) was not readily available or regularly compiled to facilitate the monitoring of performance of all DEHOs (paras. 4.11 and 4.12).

17. ***Need to explore the use of technologies in monitoring service delivery.*** Audit noted that: (a) DEHOs relied heavily on paper-based documents submitted by contractors to monitor the delivery of street cleansing services. The work programmes and reports of in-house street cleansing services were also kept in paper forms. The manual vetting procedures involved were resource intensive, time consuming and prone to errors; and (b) apart from daily inspections, records of other monitoring inspections under the multi-tier monitoring mechanism (see para. 5) were in paper forms (para. 4.19).

18. ***Need to conduct more employment-related inspections.*** According to FEHD, public cleansing service contracts rely heavily on the deployment of non-skilled workers and the Central Investigation Team was set up under its Quality Assurance Section in September 2005 with a view to tightening the control on its contractors (e.g. conducting employment-related inspections to obtain timely feedback from contractors' employees through completing questionnaires). According to FEHD guidelines, employment-related inspections are conducted on a daily basis, subject to manpower deployment. Audit examination of 61 street cleansing service contracts commenced and completed in the period from January 2019 to December 2024 for 19 DEHOs noted that only 41 employment-related inspections (involving 36 street cleansing service contracts) were conducted, i.e. at a frequency far lower than "on a daily basis" stated in FEHD guidelines (paras. 4.24, 4.27 and 4.28).

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Audit recommendations

19. 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:

Monitoring of service delivery

- (a) enhance checking on daily attendance records submitted by contractors and take follow-up actions against the contractors for submitting inaccurate records (para. 2.20(a));
- (b) take measures to enhance compliances with the requirements on conducting self-discipline quality inspections for outsourced street cleansing services and document the reasons for non-compliances (para. 2.20(b));
- (c) strengthen measures to monitor the compliance with the frequencies and coverage stipulated in FEHD guidelines for monitoring inspections, and the submission and review requirements on the monitoring inspection reports stipulated in FEHD guidelines for street cleansing services (paras. 2.20(c) and 2.38(c));
- (d) take measures to improve the timeliness in issuing warning letters and default notices to contractors, and review FEHD guidelines on the timeframe for issuing warning letters and default notices to contractors (para. 2.20(d) and (e));
- (e) review the effect of FEHD's measures regarding the past performance of contractors on future tender assessment exercises and take follow-up actions as appropriate (para. 2.20(f));
- (f) strengthen measures to monitor the compliance with the planned frequencies for in-house street sweeping services and approved work programmes for in-house street washing services (para. 2.38(a) and (b));

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- (g) regarding Overseers' daily inspections for in-house street cleansing services, regularly review the frequency, take measures to enhance the maintenance of records in EMS and consider setting a timeframe for reviewing the reports (para. 2.38(d) to (f));
- (h) keep under review the provision of in-house street cleansing services, taking into account the staff recruitment situation, and take follow-up actions as appropriate (para. 2.38(g));

Tackling illegal disposal of refuse

- (i) specify the information to be included in work programs of DETs in FEHD guidelines (para. 3.23(a));
- (j) enhance documentation of the work performed by DETs for monitoring compliance with the work programs (para. 3.23(b));
- (k) review the inspections and enforcement actions needed for locations with frequent littering activities and long outstanding cases in situation reports, and properly record the locations in situation reports for monitoring by DETs (para. 3.23(d));
- (l) conduct a review on the operations of DETs and take follow-up actions as appropriate (para. 3.23(e));
- (m) take measures to require DEHOs to periodically review the deployment of IP cameras in accordance with FEHD guidelines (para. 3.23(f));
- (n) review the current measures of improving street cleanliness of locations with persistent hygiene problems in public places (para. 3.23(g));
- (o) for cases involving obstruction to street cleansing operations and relating to broader street management issues, keep under review the street cleanliness of the locations and take appropriate follow-up actions (para. 3.23(h));

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Other related issues

- (p) **enhance EHSIS to monitor the completeness of information in the returns for performance measures (para. 4.9(a));**
- (q) **enhance the reporting mechanism of the performance measures on street cleansing services (para. 4.9(b));**
- (r) **regarding the performance measure on street washing services, review the design of the return to facilitate the reporting of achievement and take measures to check the consistencies between the number of streets in the returns and those in the lists of busy areas maintained by individual DEHOs (para. 4.9(d) and (e));**
- (s) **regularly compile management information for monitoring delivery of street cleansing services for all DEHOs and the enforcement figures against public cleanliness offences (para. 4.13);**
- (t) **explore the use of technologies in monitoring street cleansing services (para. 4.21(b)); and**
- (u) **conduct more employment-related inspections as far as practicable with a view to obtaining timely feedback from contractors' employees (para. 4.29(b)).**

Response from the Government

20. The Director of Food and Environmental Hygiene agrees with the audit recommendations.

PART 1: INTRODUCTION

1.1 This PART describes the background to the audit and outlines the audit objectives and scope.

Background

1.2 Street cleanliness is an integral part of environmental hygiene and public health. It can reduce disease transmission and help curb rodent infestation, as well as create a favourable cityscape to enable citizens to enjoy an improved quality of life. The Food and Environmental Hygiene Department (FEHD) is responsible for providing quality environmental hygiene services and facilities and safeguarding public health. The core duties include monitoring of street cleansing service delivery (Note 1) as well as carrying out enforcement actions against illegal disposal of refuse under the relevant Ordinances (e.g. the Public Health and Municipal Services Ordinance (Cap. 132)).

Street cleansing services

1.3 According to FEHD, its street cleansing services mainly include sweeping and washing of streets, cleansing of gullies, and removal of illegal bills and posters (Note 2).

Note 1: *In general, FEHD is responsible for routine cleansing of public street/roads/lanes (other than expressways and connecting high speed roads), central dividers, roadside landscapes and other public facilities such as public transport interchanges, bus termini, taxi stands, public light bus termini, traffic islands, emergency vehicular access and public car parks. Routine sweeping of footbridges and subways (including associated lifts and escalators) and washing of floor of footbridges and subways with immediate hygiene problem also fall into the purview of FEHD.*

Note 2: *According to the Public Health and Municipal Services Ordinance, bills or posters include any word, letter, model, sign, placard, board, notice, device or representation.*

Introduction

1.4 **Street sweeping services.** According to FEHD, street sweeping is essential for keeping the city clean. Street sweeping services generally include:

- (a) manual street sweeping;
- (b) bin emptying services (e.g. emptying of litter containers and dog excreta collection bins); and
- (c) removal of the street waste to designated refuse collection points for disposal.

All streets are manually swept at least once every day and all bins are regularly emptied and cleansed. Complementing manual sweeping are mechanical street sweepers (see Photographs 1(a) and (b)) used to cleanse areas that may impose danger to cleansing workers carrying out manual sweeping (i.e. flyovers, central dividers and other high-use traffic areas). Such areas are swept 1 to 7 times per week normally after midnight when the traffic is light.

Photographs 1(a) and (b)

Mechanical street sweepers

(a)



(b)



Source: FEHD records

1.5 ***Street washing services.*** Street washing services include washing, scrubbing and brushing, and removing all dirt and water afterwards so that the streets are in a safe condition for use by pedestrians and/or vehicles. For trunk roads with heavy traffic where normal washing is not practicable, street flushing is done during non-busy hours. The frequency of street washing ranges from as-needed to daily, depending on the nature of the area served. Street washing vehicles (see Photograph 2) are used in delivering the street washing services.

Photograph 2

Street washing vehicle



Source: FEHD records

1.6 ***Gully cleansing services.*** Gully cleansing services include manual clearing of gullies, delivering the dirt and refuse taken from gullies to refuse collection points, and applying larvicidal oil to gullies as a precaution against mosquito breeding. According to FEHD, roadside gullies are generally cleared manually every two to four weeks and larvicidal oil is applied on weekly basis. Complementing manual clearing of roadside gullies are gully emptiers (see Photograph 3) used to clear gullies in areas where manual means will pose danger to life and limb (e.g. high speed roads, main thoroughfares and flyovers). Such gullies are cleared once every six weeks normally after midnight when the traffic is light.

Photograph 3

Gully emptier



Source: FEHD records

1.7 ***Poster removal services.*** Poster removal services include removing illegal bills and posters. Every day, FEHD patrols streets and removes illegal bills and posters that come into its attention.

Delivery of street cleansing services

1.8 According to FEHD, street cleansing services were delivered by its staff (i.e. in-house) as well as by contractors (i.e. outsourced) with a total workforce of about 13,200 (comprising about 3,000 in-house staff and about 10,200 contractors' staff) (Note 3) as at 30 September 2024. The outsourcing policy aims at greater cost-effectiveness and flexibility in the delivery of services. As at 30 September 2024, about 82% of the street cleansing services were outsourced.

1.9 According to FEHD guidelines, each district is divided into 12 cleansing sectors by making reference to the existing boundary areas of the supervisory staff of district cleansing sections and the distribution/percentage of the outsourced areas and in-house areas (see also Note 12 to para. 2.2(a)). The division of the cleansing sectors

Note 3: According to FEHD, the total workforce of about 13,200 was also responsible for providing other public cleansing services (e.g. waste collection services).

can be flexible taking into account the geographical locations and services involved as the broad principle is to cover each and every part of the district and to identify the responsible staff for follow-up actions. Besides, street cleansing service contracts (each with a duration of three years — Note 4) are arranged on district basis. As at 30 September 2024, FEHD had 42 street cleansing service contracts with a total contract value of \$7.62 billion (Note 5) and 2 bulk service contracts (i.e. serving all districts) (each with a duration of five years) for mechanical street sweeping services and mechanical gully cleansing services with contract values of \$111 million and \$39 million respectively.

Monitoring mechanism on street cleansing services

1.10 To monitor outsourced and in-house street cleansing services, FEHD conducts regular spot checks and surprise inspections as well as examining job records. In addition, to ensure that the outsourced cleansing operations in public places are performed with due diligence, FEHD has, depending on operational needs of individual districts, stipulated in the tender documents for outsourced services the required performance standards and minimum requirements on manpower and vehicles, work shifts and frequency of service for each cleansing task. In the event of any irregularities, defaults or non-compliances with contract provisions in the delivery of services by the contractors, FEHD will take follow-up and corresponding actions, including issuance of verbal/written warnings and/or default notices (coupled with the deductions of monthly payments to the contractors). The performance records will affect the eligibility and rating of contractors in their future bidding for FEHD's outsourced service contracts. Besides, FEHD uses the Complaint Management Information System (CMIS) to manage all complaints received. With a view to facilitating districts to conduct analyses on data on complaints about street cleansing services and draw up a list of hotspots of complaints on street cleanliness, FEHD rolled out CMIS – hotspot analysis in October 2021. In the period from

Note 4: *For street cleansing service contracts commencing on or before March 2022, the contract periods ranged from one to three years.*

Note 5: *The figure excluded the cost of public toilet management services in 17 districts, which amounted to \$740 million. According to FEHD, public toilet management services will be purchased independently upon renewal of the street cleansing service contracts in individual districts.*

Introduction

2020 to 2024, the number of complaints received by FEHD relating to street cleansing services was over 50,000 each year (Note 6).

Tackling illegal disposal of refuse

1.11 According to FEHD, to improve environmental hygiene, it combats illegal dumping in a multi-pronged manner. Apart from stepping up cleansing services, FEHD has enhanced enforcement actions and publicity.

1.12 ***Enforcement actions.*** FEHD carries out enforcement actions against people committing public cleanliness offences. Under the Fixed Penalty (Public Cleanliness and Obstruction) Ordinance (Cap. 570), FEHD may issue Fixed Penalty Notices (FPNs) for specified public cleanliness offences, including \$3,000 FPNs for depositing of litter or waste or spitting in public places, display of bills or posters without permission and fouling of street by dog faeces, and \$6,000 FPNs for unlawful depositing of waste. FEHD may also institute prosecution by way of summons against the offenders in accordance with the relevant legislations (Note 7). According to FEHD, with a view to enhancing enforcement efficiency, resources are deployed flexibly according to actual circumstances and enforcement actions are taken in a multi-pronged approach, including the following:

- (a) ***Dedicated Enforcement Teams (DETs).*** Since June 2017, FEHD has set up DETs to step up enforcement actions against various public cleanliness offences. DETs perform enforcement duties in plain clothes and are deployed to various littering black spots. DETs also convey health messages, distribute leaflets and warning notices to arouse public awareness of maintaining street cleanliness and the proper way for disposal of refuse.

Note 6: *The numbers of complaints received by FEHD relating to street cleansing services were 58,639 in 2020, 66,495 in 2021, 55,237 in 2022, 62,707 in 2023 and 66,120 in 2024.*

Note 7: *All the scheduled offences under the Fixed Penalty (Public Cleanliness and Obstruction) Ordinance are offences under the corresponding legislations, such as the Public Health and Municipal Services Ordinance (for display of bills or posters without permission under section 104A(2)) and the Public Cleansing and Prevention of Nuisances Regulation (Cap. 132BK) (for depositing of litter or waste in public places under section 4(1), spitting in public places under section 8A(1) and fouling of street by dog faeces under section 13(1)(a)).*

As of December 2024, there were 46 DETs with a total of 211 members; and

- (b) **Internet Protocol (IP) cameras.** According to FEHD, in December 2016, it launched a pilot scheme on installation of IP cameras at six illegal refuse deposit black spots in three districts, which had effectively curbed illegal deposits of refuse through targeted surveillance and enforcement actions. Since June 2018, FEHD has installed IP cameras at illegal refuse deposit black spots over the territory. According to FEHD, it can institute prosecution against registered owners of vehicles or relevant offenders for illegal dumping of refuse based on the footage captured by IP cameras (Note 8) and formulate more effective enforcement operations through analysing the timing and patterns of illegal acts. In November 2024, in order to combat the illegal act of littering from vehicles, the FEHD launched a trial scheme to pilot the installation of IP cameras on roads with central dividers in two districts. As of December 2024, IP cameras were installed at 470 illegal refuse deposit black spots.

1.13 **Publicity.** According to FEHD, it has been disseminating information on personal, household and environmental hygiene (including maintaining street cleanliness) through different channels, including broadcast of Announcements in the Public Interest on television and radio, display of posters at main public transport facilities, distribution of pamphlets and leaflets, and the use of social media platform pages of Keep Clean Ambassador Ah Tak.

Responsible sections and offices

1.14 FEHD's work relating to street cleansing services falls within the programme area "Environmental Hygiene and Related Services" (Note 9). In

Note 8: *Littering from vehicles is an offence under section 9A of the Public Cleansing and Prevention of Nuisances Regulation.*

Note 9: *Other work within the programme area "Environmental Hygiene and Related Services" includes waste collection, licensing and inspecting food premises, processing of applications for liquor licences and administrative support to the Liquor Licensing Board, management of cremation and burial facilities, regulating private columbaria, and abating environmental nuisances relating to dripping air-conditioners and water seepage.*

Introduction

2023-24 (Note 10), the expenditure for street cleansing and related services amounted to about \$5.1 billion (Note 11). The main sections and offices of FEHD responsible for work relating to street cleansing services are as follows:

- (a) the Headquarters Cleansing and Pest Control Section under Operations Division 3 is responsible for formulation, promulgation and review of procedures, standards and strategies on cleansing and pest control services, including street cleansing services;
- (b) the 19 District Environmental Hygiene Offices (DEHOs) under three Operations Divisions are responsible for overall planning, organisation, provision and monitoring of street cleansing services in respective districts. The duties include monitoring of street cleansing services delivery and carrying out enforcement actions against illegal disposal of refuse;
- (c) the 3 Operations Sections under three Operations Divisions are responsible for monitoring of mechanical street sweeping services and mechanical gully cleansing services on the Hong Kong Island and Islands, in Kowloon and the New Territories; and
- (d) the Quality Assurance Section of the Grade Management and Development Division is responsible for conducting audit inspections and employment-related inspections, and investigating employment-related

Note 10: *As announced in the 2022-23 Budget Speech, a total additional funding of \$500 million would be allocated within two years for FEHD to enhance environmental hygiene services. According to FEHD, of the additional funding, about \$369 million was for additional services (comprising \$246 million for street cleansing and management of public toilets, and \$123 million for refuse collection, pest control and market management), and the remaining of about \$131 million was for meeting part of the increase in costs of regular services in the aforementioned aspects. FEHD did not maintain a separate breakdown of the allocation of the funding to street cleansing services, and all funding was exhausted by the end of 2023-24.*

Note 11: *The expenditure for FEHD's programme area "Environmental Hygiene and Related Services" amounted to about \$6.7 billion in 2023-24. According to FEHD, the expenditure of about \$5.1 billion also included the expenditure on waste collection services and management of public cleansing facilities. It did not maintain a separate breakdown of the expenditure on street cleansing services.*

complaints concerning non-skilled workers (i.e. workmen) and their supervisors of FEHD's service contractors.

As at 30 September 2024, 1,809 staff under the three Operations Divisions and 7 staff under the Quality Assurance Section (see also Note 63 to para. 4.24) were responsible for the street cleansing services. An extract of the organisation chart of FEHD (as at 30 September 2024) is at Appendix A.

Audit review

1.15 In November 2024, the Audit Commission (Audit) commenced a review to examine FEHD's street cleansing services. The audit review has focused on the following areas:

- (a) monitoring of service delivery (PART 2);
- (b) tackling illegal disposal of refuse (PART 3); and
- (c) other related issues (PART 4).

Audit has found room for improvement in the above areas and has made a number of recommendations to address the issues.

General response from the Government

1.16 The Secretary for Environment and Ecology expresses gratitude to Audit for the comprehensive review of FEHD's work in street cleansing services. He agrees with the audit recommendations, and affirms Government's commitment to keeping the city clean. Over the years, FEHD has introduced different initiatives to improve service delivery, strengthen performance management and enhance enforcement efficiency. The Environment and Ecology Bureau will provide policy steer and oversight for FEHD to take forward the audit recommendations to further enhance street cleansing services.

Introduction

1.17 The Director of Food and Environmental Hygiene expresses his appreciation for Audit's work in auditing FEHD's street cleansing services. He has also said that:

- (a) FEHD is committed to maintaining a clean and hygienic living environment for the people of Hong Kong, and has been working towards this goal through efficient cleansing services, effective enforcement actions, and sustained publicity efforts. In recent years, FEHD has been proactively taking forward various initiatives to improve its service quality and enforcement efficiency. For example, FEHD has brought in new type of street washing machine and expanded the use of IP camera system to assist enforcement actions against refuse dumping; and
- (b) FEHD agrees with the audit recommendations and will take them into account in its continuous efforts in improving its public cleansing services.

Acknowledgement

1.18 Audit would like to acknowledge with gratitude the full cooperation of the staff of FEHD during the course of the audit review.

PART 2: MONITORING OF SERVICE DELIVERY

2.1 This PART examines issues relating to the monitoring of service delivery, focusing on the following areas:

- (a) monitoring of outsourced street cleansing services (paras. 2.5 to 2.21); and
- (b) monitoring of in-house street cleansing services (paras. 2.22 to 2.39).

Background

2.2 ***Delivery of street cleansing services.*** According to FEHD, street cleansing services mainly include:

- (a) ***Street sweeping services.*** Services are delivered in day, evening and midnight shifts (Note 12). Each workman is allocated with a length of road (hereinafter referred to as a beat) within a work shift;
- (b) ***Street washing services.*** Services are delivered in day and evening shifts by street washing gangs/teams, comprising a ganger, two to three workmen and a driver operating the street washing vehicle in each gang/team (Note 13);
- (c) ***Gully cleansing services.*** Services are delivered only in day shifts by gully cleansing teams (generally comprising two workmen in each team) which are allocated with a number of roadside gullies within work shifts; and

Note 12: *According to FEHD, in some districts, evening shift work for in-house areas are carried out by contractors.*

Note 13: *For street washing services delivered by contractors, in general, a team with a supervisor-cum-driver and two to three workmen is deployed instead.*

Monitoring of service delivery

- (d) ***Poster removal services.*** Services are generally delivered in day and evening shifts by a workman for each route (Note 14).

The types of street cleansing services provided by in-house staff varied among DEHOs (see para. 2.34(a)). According to FEHD, it aims to provide efficient and courteous services and has set performance measures on the street cleansing services (see para. 4.2).

2.3 ***FEHD's multi-tier monitoring mechanism.*** According to FEHD guidelines, to monitor the street cleansing service delivery, it has adopted a multi-tier monitoring mechanism for outsourced and in-house street cleansing services in each DEHO. The details of various types of monitoring inspections are as follows:

- (a) ***Daily inspections.*** Frontline supervisory staff (i.e. Senior Foremen for outsourced areas and Foremen for in-house areas) are responsible for day-to-day supervision and monitoring of the street cleansing service delivery. In addition, for in-house areas, Overseers may carry out random and surprise checks on the daily inspection work performed by Foremen under their purview;
- (b) ***Formal inspections.*** With a view to making clear the performance standards and setting a performance benchmark for future inspections, Overseers, Health Inspectors and Senior Health Inspectors conduct formal inspections regularly to inspection targets selected by Chief Health Inspectors. During formal inspections, the inspecting officers are accompanied by Foremen for in-house areas, and Senior Foremen and contractors' supervisors for outsourced areas;
- (c) ***Assigned risk-based surprise inspections.*** With a view to timely identifying critical malpractice (e.g. improper work practice or non-performance of services in odd hours or remote areas that have higher risk of not being detected under the routine inspection system), and hence taking prompt remedial action to prevent the recurrence as well as imposing

Note 14: *According to FEHD, in-house workmen and some contractors' workmen responsible for providing street sweeping services also provide poster removal services. Besides, poster removal services may also be provided by other workmen who are not primarily responsible for street sweeping services or poster removal services (see also Note 19 to para. 2.6(c)).*

a sufficient deterrent effect, Overseers (Note 15) conduct assigned risk-based surprise inspections regularly to inspection targets selected by Senior Health Inspectors;

- (d) ***Supervisory checks.*** Supervisory check is an inspection system maintained at levels of Health Inspector and Senior Health Inspector with a view to ensuring that the required performance standards in service delivery are sustained and the relevant operational guidelines/procedures are properly followed. Supervisory checks are conducted in an unannounced manner; and
- (e) ***Systematic inspections.*** Chief Health Inspectors and District Environmental Hygiene Superintendents should conduct frequent district patrol as far as time permits with the ultimate aim of enhancing performance management and systematic improvement of the services in their districts.

FEHD guidelines also set out the details of the monitoring mechanism (including criteria for selecting inspection targets, inspection frequencies, timeframes and coverage (see Appendix B) and timeframes for submitting written reports after the inspections).

2.4 ***Audit's visits to three DEHOs.*** From December 2024 to March 2025, Audit visited three DEHOs (Note 16) (i.e. Central/Western, Sham Shui Po and Yuen Long DEHOs) to review their work relating to delivery of street cleansing services.

Note 15: *For outsourced street cleansing services, some Senior Foremen (Special Duties) may also conduct assigned risk-based surprise inspections.*

Note 16: *Audit visited one DEHO from each of the three Operations Divisions with the highest amount of total contract values of street cleansing service contracts as at 30 September 2024.*

Monitoring of outsourced street cleansing services

Need to enhance checking on daily attendance records submitted by contractors

2.5 According to the street cleansing service contracts, contractors are required to provide stipulated minimum numbers and types of contractor personnel and ensure their full attendance. For example, for street sweeping services, each work shift shall be attended by a workman. Contractors are also required to submit daily attendance records to FEHD for checking.

2.6 Audit examined the daily attendance records of the three DEHOs (see para. 2.4) for outsourced street cleansing services in December 2023 and September 2024, and found that the attendance requirement of contractors' staff was not fully met in some days, comprising:

- (a) for street sweeping services, in December 2023, in 7 of 9,300, 1 of 7,936 and 3 of 8,401 work shifts (Note 17), the attendances of contractors' workmen of Central/Western, Sham Shui Po and Yuen Long DEHOs respectively were not indicated in the records. In September 2024, in 3 of 9,000, 1 of 7,170 and 7 of 8,130 work shifts, the attendances of contractors' workmen of Central/Western, Sham Shui Po and Yuen Long DEHOs respectively were not indicated in the records;
- (b) for gully cleansing services, in 1 of 496 and 1 of 186 work shifts (Note 18), the records did not indicate that the stipulated minimum number of contractor personnel (i.e. shortfall of 1 workman) was provided for Central/Western and Yuen Long DEHOs respectively in December 2023; and

Note 17: *The total numbers of work shifts were calculated by multiplying the number of days in the month by the number of outsourced street sweeping beats per day.*

Note 18: *The total numbers of work shifts were calculated by multiplying the number of days in the month by the number of outsourced work shifts for gully cleansing services per day.*

- (c) for poster removal services (Note 19), in 2 of 651 and 1 of 310 work shifts (Note 20), the attendances of contractors' workmen of Central/Western and Sham Shui Po DEHOs respectively in December 2023 were not indicated in the records.

2.7 Upon enquiry, FEHD informed Audit in March 2025 that, based on the contractors' attendance books which were provided to FEHD upon request, all the above work shifts were actually attended by contractors' workmen and provided with the stipulated minimum number of contractor personnel. However, the daily attendance records of December 2023 and September 2024 submitted by the contractors concerned in the same months to FEHD were inaccurate and these attendances were not reflected. In this connection, Audit noted that Senior Foremen of FEHD had reviewed the daily attendance records submitted by the contractors concerned. In Audit's view, FEHD needs to enhance checking on daily attendance records submitted by contractors and take follow-up actions against the contractors for submitting inaccurate records.

Need to enhance compliances with requirements on conducting self-discipline quality inspections for outsourced street cleansing services

2.8 According to the street cleansing service contracts, contractors are required to provide the stipulated numbers of inspection teams to conduct self-discipline quality inspections to monitor the street cleansing services delivered by their workmen. Besides, FEHD guidelines stipulate that Health Inspectors shall assign each inspection team to conduct at least two inspections per week and cover two tasks for each inspection.

Note 19: *According to FEHD, depending on areas'/districts' needs, district management might consider not to require a separate team for providing the poster removal services upon renewal of the street cleansing service contracts. Under these circumstances, poster removal services were provided by mobile cleansing teams which are responsible for performing a variety of duties, such as removal of posters and chewing gums, repair and maintenance of public toilets, clearance of lanes and ad hoc duties. Their work was not included in this analysis. For Yuen Long DEHO and the existing contracts of Sham Shui Po DEHO, poster removal services were provided by the mobile cleansing teams.*

Note 20: *The total numbers of work shifts were calculated by multiplying the number of days in the month by the number of outsourced work shifts for poster removal services per day.*

Monitoring of service delivery

2.9 Audit examined the inspection records of contractors' inspection teams for outsourced street cleansing services of the three DEHOs (see para. 2.4) for September 2024 and found that for Central/Western DEHO:

- (a) 4 (44%) of 9 inspection teams carried out only one task in each self-discipline quality inspection; and
- (b) the other 5 (56%) of 9 inspection teams did not conduct any self-discipline quality inspection in the first week (Note 21) of September 2024 (i.e. 1 to 7 September 2024) and only conducted one self-discipline quality inspection each in the second and fourth weeks of September 2024 (i.e. 8 to 14 September 2024 and 22 to 28 September 2024 respectively).

In this connection, Audit noted that the Health Inspectors concerned had not assigned tasks/the required number of tasks to the contractors' inspection teams for conducting the self-discipline quality inspections for the period. Upon enquiry, FEHD informed Audit in March 2025 that it was mainly because they were deployed by district staff to carry out urgent inspections to handle ad hoc duties. Audit considers that FEHD needs to take measures to enhance compliances with the requirements on conducting self-discipline quality inspections for outsourced street cleansing services and document the reasons for non-compliances.

Need to conduct monitoring inspections for outsourced street cleansing services in accordance with stipulated frequencies and coverage

2.10 Apart from contractors' self-discipline quality inspections, FEHD conducts monitoring inspections under the multi-tier monitoring mechanism (see para. 2.3) to monitor outsourced street cleansing services. According to FEHD guidelines, monitoring inspections shall be conducted in accordance with the stipulated frequencies and coverage.

Note 21: *According to FEHD guidelines, a week is from Sunday to Saturday.*

2.11 Audit examined the monitoring inspection records of the three DEHOs (see para. 2.4) for outsourced street cleansing services in the period from January 2023 to September 2024 (Note 22) and noted a number of issues, as follows:

- (a) **Daily inspections.** In the period from 1 to 14 September 2024:
 - (i) for Central/Western and Yuen Long DEHOs, of 210 and 182 daily inspections required (Note 23), 5 (2%) and 21 (12%) did not cover the required beats (against the requirement of covering at least 10% of the cleansing sector each working day — see item 1(a) in Appendix B) respectively (Note 24); and
 - (ii) for Yuen Long DEHO, there was no documentation showing that 6 (2%) of 271 beats were covered in daily inspections (against the requirement of covering the whole cleansing sector (i.e. every beat) once every 10 working days — see item 1(a) in Appendix B) (see also Note 24);
- (b) **Formal inspections.** While formal inspections shall be conducted by Overseers monthly, in the period from January 2023 to September 2024 (comprising 21 months), for Central/Western and Sham Shui Po DEHOs, formal inspections were not conducted in 1 (5%) of 21 months. Upon enquiry, FEHD informed Audit in March 2025 that the formal inspections concerned were conducted within one month following the original scheduled date and the overall frequency of Overseers' formal inspections remained unchanged; and

Note 22: *The frequencies, timeframes and coverage for different types of monitoring inspections for outsourced street cleansing services varied (see Appendix B), Audit examination covered various periods, comprising: (a) 1 to 14 September 2024 for daily inspections; (b) January 2023 to September 2024 for formal inspections; (c) September 2024 for assigned risk-based surprise inspections; and (d) July to September 2024 for supervisory checks.*

Note 23: *The figure was calculated by multiplying the number of days in the period by the number of daily inspections required for outsourced street cleansing services in each day.*

Note 24: *According to FEHD, there was manpower shortage (i.e. a vacancy of 2 (11%) of 18 Senior Foremen in the area concerned), annual leave and alternative holiday arrangements for the inspecting officers in September 2024 for Yuen Long DEHO.*

Monitoring of service delivery

- (c) *Assigned risk-based surprise inspections.* While assigned risk-based surprise inspections shall be conducted not fewer than once per week, in September 2024, for Sham Shui Po DEHO, such inspections were not conducted in one week.

Audit considers that FEHD needs to strengthen measures to monitor the compliance with the frequencies and coverage stipulated in its guidelines for monitoring inspections for outsourced street cleansing services. In this connection, FEHD informed Audit in March 2025 that it would consider developing an information technology system for monitoring inspections for both outsourced and in-house street cleansing services (see para. 4.19(c)). In Audit's view, FEHD needs to make use of the system to facilitate its officers' compliance with the inspection requirements and monitoring work.

Need to submit and review monitoring inspection reports for outsourced street cleansing services in accordance with stipulated timeframes

2.12 According to FEHD guidelines, written reports shall be submitted by inspecting officers within 1 to 2 working days (depending on the types of monitoring inspections) after conducting the monitoring inspections. For supervisory checks, the reports need to be reviewed by senior officers within 5 working days. Audit examined the monitoring inspection reports of the three DEHOs (see para. 2.4) for outsourced street cleansing services in the period from January 2023 to September 2024 (see Note 22 to para. 2.11) and the findings were shown in Table 1.

Table 1

**Audit's findings on FEHD's submission and review of
monitoring inspection reports for outsourced street cleansing services
(January 2023 to September 2024)**

Type	Examination period	Timeframe for submission/ review	DEHO	No. of reports not meeting stipulated timeframes	Delay (Working day)
Formal inspection (by Health Inspector/ Senior Health Inspector)	January 2023 to September 2024	Submit within 2 working days	Central/ Western	4 (24%) of 17	3 to 7 (averaging 5)
			Sham Shui Po	9 (50%) of 18	1 to 10 (averaging 4)
			Yuen Long	3 (14%) of 22	1 to 3 (averaging 2)
Formal inspection (by Overseer)	January 2023 to September 2024	Submit within 2 working days	Sham Shui Po	1 (5%) of 21	4
				Not ascertainable for 4 (19%) of 21 reports (Note)	
Assigned risk-based surprise inspection	September 2024	Submit within 1 working day	Yuen Long	1 (13%) of 8	2
Supervisory check	July to September 2024	Submit within 2 working days	Central/ Western	4 (17%) of 24	4 to 6 (averaging 5)
			Sham Shui Po	5 (17%) of 29	2 to 10 (averaging 6)
				Not ascertainable for 1 (3%) of 29 reports (Note)	
		Review within 5 working days	Sham Shui Po	10 (34%) of 29	1 to 4 (averaging 3)

Source: Audit analysis of FEHD records

Note: The reports were not dated and hence the compliance with the stipulated timeframe could not be ascertained.

2.13 Audit considers that FEHD needs to strengthen measures to monitor the compliance with the submission and review requirements on the monitoring inspection reports stipulated in its guidelines for outsourced street cleansing services (e.g. making use of the information technology system to facilitate its officers' compliance with the relevant requirements and monitoring work).

Room for improvement in handling contractors' non-compliances with contract terms

2.14 Under the street cleansing service contracts, warnings (verbal/written) and/or default notices will be issued to contractors for breach of contract terms. In general, according to its nature of the breaches of contract terms, warnings and default notices are classified into four categories as follows:

- (a) ***Performance-related.*** It covers non-compliances with service requirements as laid down in the service contracts;
- (b) ***Behaviour-related.*** It covers misbehaviour (e.g. sleeping and idling) of contractors' staff;
- (c) ***Blatant.*** It covers serious defaults in the course of service delivery (e.g. improper disposal of waste) and breaches of contractual obligations in respect of the heat stroke prevention work plan (Note 25); and
- (d) ***Employment-related.*** It covers breaches of contractual obligations (e.g. on daily maximum working hours) under the employment contracts of non-skilled workers.

According to FEHD guidelines, if a non-compliance is identified by FEHD (e.g. during daily inspection), the inspection officer shall issue a warning to give the contractor a response time to remedy/rectify the failure (Note 26). If the contractor fails to comply with the instruction given by the inspection officer within the specified time, a performance-related default notice shall be issued. For each default notice

Note 25: *According to FEHD, in view of the revised Financial Circular No. 3/2019 (which was updated on 17 May 2023), to safeguard the occupational safety and health of non-skilled workers, it has included a requirement that tenderers shall submit a heat stroke prevention work plan for street cleansing service contracts tendered on or after 31 May 2023. The work plan shall cover, among others, work arrangements and measures to be implemented in hot weather.*

Note 26: *According to FEHD guidelines, for blatant, behaviour-related or employment-related non-compliances, warnings are not compulsory before issuing the default notices.*

issued, a fixed amount (Note 27) will be deducted from the monthly payment to the contractor concerned (Note 28).

2.15 *Need to issue warning letters and default notices in accordance with stipulated timeframe.* According to FEHD guidelines, to enable the contractors to have sufficient time for effecting remedial measures to prevent recurrence, all warning letters/default notices should be delivered to contractors as soon as possible and be completed within 7 working days after the discovery of the breaches. Audit examined the warning letters and default notices issued by FEHD to contractors of 19 DEHOs in the period from January 2019 to September 2024 and found that:

- (a) FEHD did not maintain readily available information on the delivery dates of warning letters/default notices. Upon enquiry, FEHD informed Audit in March 2025 that the issue dates of the warning letters/default notices would be recorded in its system instead of the delivery dates; and
- (b) based on the issue dates of the warning letters/default notices, the time lags between the identification of non-compliances and issuance of the warning letters/default notices had exceeded 7 working days for 230 (66%) of 351 warning letters and 2,103 (54%) of 3,870 default notices (see Table 2).

Note 27: *The amount of deduction varies with: (a) categories of default notices; and (b) number of default notices issued (only applicable to performance-related default notices). As of September 2024, the amount of deduction for each default notice ranged from \$1,220 to \$9,102.*

Note 28: *According to the street cleansing services contracts, FEHD has the discretion to make deductions of an amount from the monthly payment, as liquidated damages but not as penalty, in respect of various categories of default notices issued. The liquidated damages are to cover the administrative cost for investigation, issuance of the relevant notices and subsequent inspections to check that the default is rectified.*

Table 2

**Time lags between identification of non-compliances and
issuance of warning letters and default notices
(January 2019 to September 2024)**

Category	No. of warning letters and default notices		Average time lags beyond the stipulated timeframe (Working day)
	Issued	Issued exceeding the stipulated timeframe	
<i>Warning letter</i>			
Performance-related	189	124 (66%)	37
Behaviour-related	110	62 (56%)	23
Blatant	14	6 (43%)	15
Employment-related	38	38 (100%)	79
Overall	351	230 (66%)	40
<i>Default notice</i>			
Performance-related	667	315 (47%)	16
Behaviour-related	2,707	1,466 (54%)	29
Blatant	495	321 (65%)	38
Employment-related	1	1 (100%)	114 (Note)
Overall	3,870	2,103 (54%)	28

Source: Audit analysis of FEHD records

Note: According to FEHD, the case involved complicated investigation relating to employment-related issues and extra time was required for handling the representation from the contractor.

2.16 Upon enquiry, FEHD informed Audit in March 2025 that the longer time taken for issuing some warning letters/default notices was mainly due to the time required for seeking legal advice, contractors' explanations, the involvement of the investigations by third-parties (e.g. law enforcement departments) or inspections by the Quality Assurance Section (see para. 1.14(d)), and checking a vast volume of records. Also, additional time was required due to departmental resources being allocated to combat the coronavirus disease (COVID-19) epidemic. Nevertheless, FEHD would contact the contractor as soon as possible upon detection of

non-compliances to enable the latter to effect remedial measures to prevent recurrence of similar problems. While noting FEHD's explanations, to facilitate the consideration of complete information (i.e. number of default notices issued to contractors involving in the tender exercises) in the tender assessment exercises of street cleansing service contracts (see para. 2.17), Audit considers that FEHD needs to take measures to improve the timeliness in issuing warning letters and default notices to contractors. FEHD also needs to review its guidelines on the timeframe for issuing warning letters and default notices to contractors to better monitor the timeliness in issuing the relevant documents.

2.17 *Need to review effect of FEHD's measures regarding past performance of contractors on future tender assessment exercises.* According to FEHD, in tender assessment exercises of street cleansing service contracts, the evaluation will take into account the number of default notices and demerit points issued to the contractors submitting the tenders, which has created a deterrent effect. The details are as follows:

- (a) ***Demerit point records.*** Demerit point system serves to give an early warning to contractors who have breached their contractual obligations. Under the demerit point system, a contractor accumulating three demerit points or more over a rolling period of 36 months is debarred from bidding for non-skilled worker contracts for a period of five years from the date of which the third demerit point is obtained. One demerit point is given to the contractor for:
 - (i) each employment-related default notice issued in respect of wages, daily maximum working hours, signing of standard employment contracts, payment of wages by means of autopay, statutory holiday pay, typhoon pay and gratuity; or
 - (ii) every two blatant default notices issued relating to an incident of substantiated complaint or non-compliance with the heat stroke prevention work plan over a continuous period of 12 months; and
- (b) ***Past performance records.*** Different types of default notices carry varying weightings. The total weighted number of default notices is calculated by the number of notices for blatant, performance-related and

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behaviour-related defaults (Note 29) issued under street cleansing service contracts of FEHD multiplied by a factor of 2, 1 and 0.5 respectively.

According to FEHD, as of September 2024, scores of 7 and 15 (out of 100) technical marks were allocated for contractors' demerit point records under all non-skilled worker contracts of the Government and past performance records in all street cleansing service contracts of FEHD respectively within 36 months immediately preceding the tender closing date (Note 30). As of March 2025, FEHD adopted a 50%-50% weighting for the price score and technical score in the tendering exercises of street cleansing service contracts.

2.18 Audit examination of the latest completed street cleansing service contracts for 19 DEHOs as of September 2024 (involving a total of 38 contracts — Note 31) noted that the total number of default notices issued was 35 on average (ranging from 2 to 179) for each contract (Note 32). Among these 38 contracts, Audit examination of 10 contracts with the largest number of default notices issued (involving 4 contractors) revealed that each of the 10 contracts was issued 74 (ranging from 45 to 179) default notices on average, including 55 (ranging from 25 to 110) behaviour-related default notices on average (Note 33) (see Appendix C). In the period from 2019 to 2024 (up to September), there were no record of debarment from bidding for the street cleansing service contracts under the demerit point system in respect of wages, daily maximum working hours, signing of standard employment contracts, payment of wages by means of autopay, statutory holiday pay, typhoon pay, gratuity and non-compliances with the heat stroke prevention work plan for the

Note 29: *According to FEHD, the number of employment-related default notices issued to contractors are already taken into account under the demerit point system.*

Note 30: *According to Financial Circular No. 2/2019, permitted technical marks for demerit point records were not less than 5 and the permitted range of technical marks for past performance records as well as experience and certification was 0 to 30. According to FEHD, as of September 2024, scores of 15 and 6 technical marks were allocated for past performance records as well as experience and certification respectively.*

Note 31: *These 38 street cleansing service contracts commenced and completed in the period from November 2019 to September 2024.*

Note 32: *The total amount of deductions ranged from \$3,183 to \$338,279 (averaging \$61,499) for each of the 38 contracts.*

Note 33: *The total amount of deductions ranged from \$56,525 to \$338,279 (averaging \$127,028) for each of the 10 contracts.*

4 contractors. Also, as of December 2024, 3 of them were the existing contractors of the street cleansing services.

2.19 In light of the large number of default notices (in particular for behaviour-related default notices) issued for each contract and the room for further adjusting the scores of technical marks allocated for contractors' demerit point records and past performance records (see para. 2.17), there is merit for FEHD to review the effect of its measures regarding the past performance of contractors on future tender assessment exercises and take follow-up actions as appropriate.

Audit recommendations

2.20 **Audit has *recommended* that the Director of Food and Environmental Hygiene should:**

- (a) enhance checking on daily attendance records submitted by contractors and take follow-up actions against the contractors for submitting inaccurate records;**
- (b) take measures to enhance compliances with the requirements on conducting self-discipline quality inspections for outsourced street cleansing services and document the reasons for non-compliances;**
- (c) strengthen measures to monitor the compliance with the frequencies and coverage stipulated in FEHD guidelines for monitoring inspections, and the submission and review requirements on the monitoring inspection reports stipulated in FEHD guidelines for outsourced street cleansing services (e.g. making use of the information technology system to facilitate the compliance with the relevant requirements by FEHD's officers and monitoring work);**
- (d) take measures to improve the timeliness in issuing warning letters and default notices to contractors;**
- (e) review FEHD guidelines on the timeframe for issuing warning letters and default notices to contractors to better monitor the timeliness in issuing the relevant documents; and**

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- (f) review the effect of FEHD's measures regarding the past performance of contractors on future tender assessment exercises and take follow-up actions as appropriate.

Response from the Government

2.21 The Director of Food and Environmental Hygiene agrees with the audit recommendations. He has said that FEHD:

- (a) has reviewed the relevant guidelines and workflow related to the audit recommendations and will monitor their compliance and implementation;
- (b) will explore the development of an information technology system to monitor staff compliance with the inspection and monitoring procedures; and
- (c) will review the effectiveness of its measures on contractors' past performance with respect to future tender assessments.

Monitoring of in-house street cleansing services

Room for improvement in delivering in-house street cleansing services

2.22 Audit examined the records of the three DEHOs for in-house street cleansing services in December 2023 and September 2024 (Note 34), and noted that:

- (a) for street sweeping services, according to FEHD guidelines, each workman is allocated with a length of road (i.e. beat) within a work shift based on time standards calculated by FEHD (e.g. about 3 minutes for 100 square meters of urban districts). However:
 - (i) in December 2023, workmen of Sham Shui Po and Yuen Long DEHOs were absent for 1 (0.2%) of 403 and 31 (1%) of 3,100 work

Note 34: *In December 2023 and September 2024, for Central/Western DEHO, no street washing services were provided by in-house staff (i.e. fully outsourced).*

shifts (Note 35) respectively. In September 2024, workmen of Yuen Long DEHO were absent for 36 (1%) of 3,000 work shifts (Note 36); and

- (ii) for Central/Western and Yuen Long DEHOs, some workmen were assigned to provide street sweeping services in more than one beat within a work shift (involving 121 (14%) of 837 work shifts in December 2023 and 58 (7%) of 810 work shifts in September 2024 for Central/Western DEHO, and 15 (0.5%) of 3,100 work shifts in December 2023 and 14 (0.5%) of 3,000 work shifts in September 2024 for Yuen Long DEHO — Note 37). Upon enquiry, FEHD informed Audit in March 2025 that the duties of each workman involving in the work shifts concerned would be thinned out or would be partially shared by workmen who were not primarily responsible for street sweeping services. As such, the original duties of workmen sharing the relevant duties of the work shifts mentioned above could not be fully carried out (i.e. the street sweeping services were not provided at a frequency as planned); and

- (b) for street washing services, according to FEHD guidelines, district management should closely monitor staff performance to ensure the provision of satisfactory street washing services in accordance with the approved work programmes. According to the work programmes approved by Senior Health Inspectors of Sham Shui Po and Yuen Long DEHOs

Note 35: *The total numbers of work shifts were calculated by multiplying the number of days in the month by the number of in-house street sweeping beats per day.*

Note 36: *According to FEHD, none of the work shifts in which workmen were absent involved street sweeping services on main roads, and the shortfall of 1% each in December 2023 and September 2024 for Yuen Long DEHO was attributed to the shortage of in-house workmen (i.e. 17 (9%) in December 2023 and 14 (7%) in September 2024).*

Note 37: *According to FEHD, to ensure that all beats were fully attended, a workman might be assigned to provide street sweeping services in more than one beat within a work shift. According to the attendance records, in addition to the beats originally assigned to them, the workmen concerned were assigned to take up additional beats (mainly 1 additional beat for each workman concerned) for 121 and 58 work shifts in December 2023 and September 2024 for Central/Western DEHO and 15 and 14 work shifts in December 2023 and September 2024 for Yuen Long DEHO respectively.*

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(Note 38), a street washing gang (comprising a ganger, three workmen and a driver operating the street washing vehicle — see para. 2.2(b)) should conduct street washing services for each work shift and there were one (Yuen Long DEHO) and two (Sham Shui Po DEHO) work shifts each day. However, for Sham Shui Po DEHO, no street washing vehicle was deployed in 33 (53%) of 62 and 17 (28%) of 60 work shifts as planned in December 2023 and September 2024 respectively (Note 39). For Yuen Long DEHO, there were temporary suspensions of the operation of the street washing vehicles during 4 (17%) of 24 and 6 (25%) of 24 work shifts in December 2023 and September 2024 respectively (Note 40). According to the work reports, of the 50 (i.e. 33 + 17) and 10 (i.e. 4 + 6) work shifts of Sham Shui Po and Yuen Long DEHOs, the staff of the street washing gangs of 45 and 1 work shifts respectively were deployed to perform other duties, comprising:

- (i) manual street washing services were provided at the designated sites in 26 work shifts of Sham Shui Po DEHO. However, of the 26 work shifts, the numbers of designated sites manually washed were less than that stated in the work programmes (i.e. some service locations were not washed as planned) in 12 work shifts. For the remaining work shifts, the street washing locations were not clearly specified (i.e. whether service locations were washed as planned could not be ascertained); and
- (ii) services other than street washing services (e.g. poster removal services) were provided in 19 and 1 work shifts of Sham Shui Po and Yuen Long DEHOs respectively (i.e. street washing services were not provided as planned).

Note 38: *According to FEHD guidelines, Health Inspectors of DEHOs were responsible for drawing up the work programmes for approval by Senior Health Inspectors in their respective DEHOs. Overseers and Health Inspectors of DEHOs should regularly review the effectiveness of work programmes of street washing services.*

Note 39: *According to the work reports, the reasons for not deploying street washing vehicles in the work shifts comprised not enough staff (88%) and vehicles requiring maintenance/not provided (12%).*

Note 40: *According to the work reports, the reason for suspensions of the operation of the street washing vehicles during the work shifts was vehicles requiring maintenance/not provided.*

There was no documentation showing that the staff of the street washing gangs of the remaining 5 work shifts of Sham Shui Po DEHO and the remaining 9 work shifts of Yuen Long DEHO were deployed to perform other duties (i.e. whether street washing services were provided as planned could not be ascertained) (Note 41).

2.23 Upon enquiry, FEHD informed Audit in March 2025 that there were various reasons for the occasional non-provision of in-house street washing services, including vehicle breakdowns and shortage of drivers. While noting FEHD's explanations, Audit considers that FEHD needs to strengthen measures to monitor the compliance with the planned frequencies for in-house street sweeping services and maintain documentation of the work carried out for beat when workman is absent. FEHD also needs to strengthen measures to monitor the compliance with approved work programmes for in-house street washing services.

Room for improvement in conducting monitoring inspections for in-house street cleansing services

2.24 ***Need to conduct monitoring inspections for in-house street cleansing services in accordance with stipulated frequencies and coverage.*** Audit examined the monitoring inspection records of the three DEHOs (see para. 2.4) for in-house street cleansing services in the period from January 2023 to September 2024 (Note 42) and noted a number of issues, as follows:

- (a) ***Daily inspections.*** Daily inspections shall be conducted by Foremen on alternate days to every beat and their records shall be maintained in an

Note 41: *According to FEHD, 3 work shifts of Yuen Long DEHO involved short-term suspensions (i.e. about 2 to 3 hours) of street washing services as a result of sudden breakdown of street washing vehicles at the service locations, which required immediate suspension of service and repairs. These were unplanned suspensions with unknown on-site repair times. Given this, and taking into account the transit time, the redeployment was deemed less important in these cases.*

Note 42: *The frequencies, timeframes and coverage for different types of monitoring inspections for in-house street cleansing services varied (see Appendix B), Audit examination covered various periods, comprising: (a) 1 to 14 September 2024 for daily inspections; (b) January 2023 to September 2024 for formal inspections; (c) September 2024 for assigned risk-based surprise inspections; and (d) July to September 2024 for supervisory checks.*

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information system, namely the E-Management System for In-house Cleansing Services and Pest Control Services (EMS — Note 43). However, in the period from 1 to 14 September 2024 (i.e. seven rounds of daily inspections), of 10 beats of each of the three DEHOs examined by Audit, some daily inspections were not conducted in accordance with the stipulated frequency and coverage (i.e. covering the 10 beats in each of the seven rounds of daily inspections) (Note 44) and/or some records were not input in EMS. The details were as follows:

- (i) the requirement was not met in all seven rounds of daily inspections of Central/Western DEHO, with shortfall ranged from 1 to 4 beats for each round. Upon enquiry, FEHD informed Audit in March 2025 that the stipulated frequency was not met in five rounds of daily inspections, with shortfall ranged from 1 to 3 beats for each round. However, the related monitoring inspection records were separately maintained and were not input in EMS;
- (ii) the requirement was not met in six rounds of daily inspections of Sham Shui Po DEHO, with shortfall ranged from 1 to 5 beats for each round; and
- (iii) the requirement was not met in all seven rounds of daily inspections of Yuen Long DEHO, with shortfall ranged from 4 to 8 beats for each round (Note 45). In particular, 1 beat was not covered throughout the period. Upon enquiry, FEHD informed Audit in March 2025 that the 1 beat had actually been covered and the shortfall should be 2 to 5 beats for each round, but the related monitoring inspection records were separately maintained and were not input in EMS; and

Note 43: *In 2022, EMS was launched to enhance the efficiency of reporting and management review of in-house cleansing services. EMS enables electronic submission and review of daily inspection reports.*

Note 44: *According to FEHD, Tropical Cyclone Warning Signal No. 8 was hoisted from 6:20 p.m. on 5 September 2024 to 12:40 p.m. on 6 September 2024 due to the impact of Super Typhoon Yagi.*

Note 45: *According to FEHD, there was manpower shortage (i.e. a vacancy of 1 (14%) of 7 Foremen in the area concerned) in September 2024 for Yuen Long DEHO and the Foreman concerned had to take up two posts in five days (36%) in the period which thinned out the duties.*

- (b) *Assigned risk-based surprise inspections.* While assigned risk-based surprise inspections shall be conducted not fewer than once per week, in September 2024, for Sham Shui Po DEHO, such inspections were not conducted in one week.

Audit considers that FEHD needs to strengthen measures to monitor the compliance with the frequencies and coverage stipulated in its guidelines for monitoring inspections for in-house street cleansing services (e.g. making use of the information technology system to facilitate its officers' compliance with the relevant requirements and monitoring work). FEHD also needs to take measures to enhance the maintenance of records of daily inspections conducted by Foremen for in-house street cleansing services in EMS.

2.25 *Need to regularly review frequency of Overseers' daily inspections for in-house street cleansing services.* Overseers may carry out random and surprise checks on the daily inspection work performed by Foremen under their purview (see para. 2.3(a)). According to FEHD guidelines, in a review conducted on the supervisory structure of district cleansing sections in 2006, regarding Overseers' daily inspections, it was recommended that:

- (a) the inspection schedule should be abolished but providing DEHOs with the autonomy to decide on the inspection requirements of the services under their purview, having regard to determining factors like cleanliness condition, elapsed time of last visit/inspection and any guidelines set out by the management;
- (b) management should ensure a cycle of the inspection to all services to be taken within a reasonable period of time; and
- (c) District Environmental Hygiene Superintendents, Chief Health Inspectors, Senior Health Inspectors or Health Inspectors might exercise discretion to increase the inspection frequency to meet specific operational requirements as appropriate.

2.26 Audit examination of the EMS records of daily inspections conducted by Overseers of the three DEHOs for in-house street cleansing services in the period from January 2023 to December 2024 found that the numbers of Overseers' daily inspections varied among DEHOs (i.e. 2 for Central/Western DEHO, 238 for Sham

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Shui Po DEHO and 556 for Yuen Long DEHO). Upon enquiry, FEHD informed Audit in March 2025 that 152 daily inspections were conducted by Overseers of Central/Western DEHO in the period from January 2023 to December 2024, and manual records (i.e. Overseers' notepads) for the 150 (i.e. 152 less 2) daily inspections were maintained but were not input in EMS.

2.27 Audit noted that while Overseers' daily inspections check the daily inspection work performed by Foremen (see para. 2.25), most (i.e. five to seven) rounds of daily inspections conducted by Foremen could not meet the required frequency and coverage (see para. 2.24(a)). In light of the audit findings, Audit considers that FEHD needs to regularly review the frequency of Overseers' daily inspections for in-house street cleansing services. FEHD also needs to take measures to enhance the maintenance of records of daily inspections conducted by Overseers for in-house street cleansing services in EMS.

Room for improvement in submitting and reviewing monitoring inspection reports for in-house street cleansing services

2.28 ***Need to submit and review monitoring inspection reports for in-house street cleansing services in a timely manner.*** According to FEHD guidelines, monitoring inspection reports shall be submitted by the inspecting officers and reviewed by senior officers within the stipulated timeframes. Audit examined the monitoring inspection reports of the three DEHOs (see para. 2.4) for in-house street cleansing services in the period from January 2023 to September 2024 (see Note 42 to para. 2.24) and found that monitoring inspection reports were not always submitted and reviewed in accordance with the stipulated timeframes (see Table 3).

Table 3

**Audit's findings on FEHD's submission and review of
monitoring inspection reports for in-house street cleansing services
(January 2023 to September 2024)**

Type	Examination period	Timeframe for submission/ review	DEHO	No. of reports not meeting stipulated timeframes	Delay
Daily inspection (by Foreman)	1 to 14 September 2024	Review weekly	Sham Shui Po	2 (6%) of 31	2 days each
Formal inspection	January 2023 to September 2024	Submit within 2 working days	Central/Western	4 (15%) of 27	1 to 17 working days (averaging 12 working days)
			Sham Shui Po	11 (39%) of 28	1 to 10 working days (averaging 4 working days)
			Yuen Long	2 (5%) of 41	2 and 3 working days
Supervisory check	July to September 2024	Submit within 2 working days	Central/Western	1 (7%) of 15	1 working day
			Yuen Long	1 (8%) of 12	4 working days
		Review within 5 working days	Central/Western	1 (7%) of 15	3 working days
			Sham Shui Po	2 (50%) of 4	1 and 5 working days
			Yuen Long	2 (17%) of 12	10 working days each

Source: Audit analysis of FEHD records

2.29 Audit also noted that for the daily inspections conducted by Overseers of the three DEHOs for in-house street cleansing services in the period from January 2023 to December 2024:

- (a) for the 796 daily inspections (i.e. 2 + 238 + 556 — see para. 2.26), the reports were reviewed 1 to 519 working days (averaging 43 working days) after the daily inspections. However, no timeframe was set in FEHD guidelines in this regard; and

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- (b) for the 150 daily inspections (see para. 2.26), no reports were submitted.

2.30 Audit considers that FEHD needs to strengthen measures to monitor the compliance with the submission and review requirements on the monitoring inspection reports stipulated in its guidelines for in-house street cleansing services (e.g. making use of the information technology system to facilitate its officers' compliance with the relevant requirements and monitoring work). To facilitate monitoring of Foremen's work, FEHD needs to consider setting a timeframe for reviewing Overseers' daily inspection reports for in-house street cleansing services.

2.31 *Need to enhance preparation and review process of formal inspection reports for in-house street cleansing services.* According to FEHD guidelines, if irregularities are identified during the formal inspections, the accompanying Foremen shall submit follow-up reports (with details of actions taken) to the inspecting officers for vetting before further submission to Senior Health Inspectors (or to Chief Health Inspectors if the inspecting officers are Senior Health Inspectors). Audit examined the formal inspection reports (including follow-up reports) of the three DEHOs for in-house street cleansing services in the period from January 2023 to September 2024 and noted that:

- (a) there were errors in some reports (e.g. the follow-up report was dated one year prior to the actual date of the formal inspection), comprising:
 - (i) 1 (4%) of 27 reports of Central/Western DEHO; and
 - (ii) 3 (23%) of 13 and 1 (4%) of 28 follow-up reports of Central/Western and Sham Shui Po DEHOs respectively; and
- (b) while 26 (93%) of 28 follow-up reports were signed by senior officers of Sham Shui Po DEHO, there was no documentation showing that the remaining 2 (7%) follow-up reports were submitted to senior officers of Sham Shui Po DEHO.

Audit considers that FEHD needs to enhance the preparation and review process of formal inspection reports for in-house street cleansing services (e.g. making use of the information technology system to facilitate report preparation and monitoring work).

*Need to keep under review
provision of in-house street cleansing services*

2.32 DEHOs are responsible for overall planning of street cleansing services, including preparing contracting-out proposals for cleansing sectors requiring renewal of the street cleansing service contracts. According to FEHD guidelines:

- (a) given the comparatively high percentage of overall outsourced street cleansing services, further expanding contracting-out requires critical examination of genuine need, for example:
 - (i) due to new developments which could not otherwise be provided by in-house staff and is more cost-effective to do so;
 - (ii) to improve existing services and meet increasing demands and new service requirements; and
 - (iii) to gain access to new skills and technologies in the market; and
- (b) prior to the expiry of each street cleansing service contract, a contracting-out proposal shall be prepared (taking into account departmental expenditure of existing services, estimated cost for new contract, availability of funding, etc.) for endorsement by the respective Assistant Director of the Operations Division (see para. 1.14).

2.33 According to FEHD, the percentage of in-house street cleansing services slightly decreased from 19% as at 31 December 2019 to 18% as at 30 September 2024 and the number of in-house workmen decreased from 1,876 to 1,819 (see Table 4).

Table 4

**Percentage of in-house street cleansing services
and number of in-house workmen
(January 2019 to September 2024)**

	As at 31 December					As at 30 September
	2019	2020	2021	2022	2023	2024
Percentage of in-house street cleansing services (Note 1)	19%	19%	19%	19%	18%	18%
No. of in-house workmen	1,876	1,908	1,823	1,820	1,756 (Note 2)	1,819 (Note 3)

Source: FEHD records

Note 1: According to FEHD, the percentage was calculated by dividing the total number of in-house street sweeping beats by the total number of street sweeping beats.

Note 2: According to FEHD, the higher vacancy rate might be attributed to a variety of contributing factors, such as the frequency and processing time of recruitment.

Note 3: As of September 2024, the establishment and strength of workmen were 2,102 and 1,819 (i.e. a shortage of 283 (13%) workmen) respectively.

2.34 Audit noted that:

- (a) the percentages of in-house street cleansing services varied among 19 DEHOs, ranging from 5% to 37% as at 30 September 2024. In particular, street washing services were fully outsourced in 3 DEHOs;
- (b) mini-street washing vehicles with pressure washer surface cleaners were used by contractors' staff, but not by in-house staff (see para. 4.17(b)); and
- (c) in the endorsed contracting-out proposals (see para. 2.32(b)) for the existing street cleansing service contracts of the three DEHOs (see para. 2.4), the comparison between the costs of outsourced and in-house street cleansing services was not included.

2.35 Upon enquiry, FEHD informed Audit in January and February 2025 that:

- (a) it did not have information on the per unit cost of outsourced and in-house street cleansing services or cost breakdown for each type of these services, or maintain a breakdown of expenditure of in-house street cleansing services (see Note 11 to para. 1.14); and
- (b) it currently had no plan to fully outsource the street cleansing services. Retention of some in-house capacity was deemed necessary for meeting operational demands and ensuring the continuity of street cleansing services in the event of unforeseen disruptions to outsourced services. This approach formed a key component of its contingency planning, safeguarding against potential service interruptions.

2.36 While noting FEHD's explanations, Audit noted that contractors were required to submit contingency plans to cope with emergency or contingency such as insufficiency of operative staff due to shortage or absence and insufficiency of vehicles and equipment due to breakdown or shortage. For example, for Sham Shui Po DEHO, the contractor stated in its contingency plan that:

- (a) it had over 3,000 frontline staff that provided a very strong back-up of flexible mobilisation for any emergency;
- (b) when there was absence of frontline staff, supervisors (who were equipped with mobile phones that could be reached at any time of emergency) could act promptly (i.e. within two hours) to manoeuvre at least one workman (reliever) to replace the absent workman for the required part of the cleansing services; and
- (c) it had spare operation vehicle/equipment for replacement in case of vehicle/equipment breakdown and experienced mechanics carrying out regular check-ups, maintenance and cleaning of its vehicles and equipment.

In addition, according to FEHD guidelines, the contractors' contingency plans have to be regularly reviewed by FEHD to ensure that the contractors have effective contingency arrangements in place (including the feasibility as well as the availability of spare/supplementary equipment).

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2.37 In view of the variance in percentages of in-house street cleansing services among DEHOs (see para. 2.34(a)), higher percentage of work shifts in which in-house workmen were absent (see para. 2.22(a)) as compared to contractors' workmen (see para. 2.6(a)), and a high vacancy rate of in-house workmen (see paras. 2.22(a)(i) and 2.33), Audit considers that FEHD needs to keep under review the provision of in-house street cleansing services, taking into account the staff recruitment situation, and take follow-up actions as appropriate.

Audit recommendations

2.38 Audit has *recommended* that the Director of Food and Environmental Hygiene should:

- (a) strengthen measures to monitor the compliance with the planned frequencies for in-house street sweeping services and maintain documentation of the work carried out for beat when workman is absent;
- (b) strengthen measures to monitor the compliance with approved work programmes for in-house street washing services;
- (c) strengthen measures to monitor the compliance with the frequencies and coverage stipulated in FEHD guidelines for monitoring inspections, and the submission and review requirements on the monitoring inspection reports stipulated in FEHD guidelines, and enhance the preparation and review process of formal inspection reports for in-house street cleansing services (e.g. making use of the information technology system to facilitate the compliance with the relevant requirements by FEHD's officers, report preparation and monitoring work);
- (d) regularly review the frequency of Overseers' daily inspections for in-house street cleansing services;
- (e) take measures to enhance the maintenance of records of daily inspections for in-house street cleansing services in EMS;

- (f) **consider setting a timeframe for reviewing Overseers' daily inspection reports for in-house street cleansing services; and**
- (g) **keep under review the provision of in-house street cleansing services, taking into account the staff recruitment situation, and take follow-up actions as appropriate.**

Response from the Government

2.39 The Director of Food and Environmental Hygiene agrees with the audit recommendations. He has said that FEHD:

- (a) has reviewed the relevant guidelines related to the audit recommendations and will monitor their compliance;
- (b) will explore the development of an information technology system to monitor staff compliance with the inspection, monitoring and reporting procedures;
- (c) has enhanced EMS for the maintenance of records of daily inspections for in-house street cleansing services; and
- (d) will keep under review the provision of in-house street cleansing services.

PART 3: TACKLING ILLEGAL DISPOSAL OF REFUSE

3.1 This PART examines FEHD's work on tackling illegal disposal of refuse, focusing on the following areas:

- (a) enforcement actions by DETs and through IP cameras (paras. 3.2 to 3.24);
- (b) other issues relating to enforcement actions (paras. 3.25 to 3.33); and
- (c) publicity work (paras. 3.34 to 3.38).

Enforcement actions by Dedicated Enforcement Teams and through Internet Protocol cameras

3.2 Under the Fixed Penalty (Public Cleanliness and Obstruction) Ordinance, FEHD may issue FPNs to offenders for specified public cleanliness offences, including:

- (a) depositing of litter or waste in public places;
- (b) spitting in public places;
- (c) display of bills or posters without permission;
- (d) fouling of street by dog faeces;
- (e) marine littering; and
- (f) unlawful depositing of waste.

3.3 With effect from 22 October 2023, the level of fixed penalty for the minor cleanliness offences under the Ordinance including depositing of litter or waste or spitting in public places, display of bills or posters without permission, fouling of street by dog faeces and marine littering has been raised from \$1,500 to \$3,000, and that for unlawful depositing of waste from \$1,500 to \$6,000. In 2024, FEHD issued

35,750 FPNs for the above offences (Note 46), involving total fines of about \$112 million.

3.4 FEHD may also institute prosecution by way of summons against the offenders. In 2024, 2,614 summons (Note 47) were issued for the specified public cleanliness offences (see para. 3.2) and littering from vehicles. According to FEHD, in order to combat illegal dumping, enforcement actions are taken in a multi-pronged approach, including setting up DETs since 2017 and installing IP cameras at illegal refuse deposit black spots over the territory since 2018 (see para. 1.12).

Need to enhance monitoring of DETs' work

3.5 According to FEHD, DETs are responsible for taking enforcement actions against public cleanliness offences and performing publicity and public education duties to arouse public awareness of maintaining street cleanliness. According to FEHD guidelines:

- (a) DET members perform enforcement duties in plain clothes and are deployed to various littering black spots, such as public places with conglomeration of food premises and shops. The work results of DETs should be closely monitored and suitable adjustment should be made to the work programs of DETs in achieving the target to reinforce the enforcement against public cleanliness offences;
- (b) records on locations with littering activities and actions taken to tackle the problem should be properly maintained to facilitate the monitoring of the ground situation. The information is recorded in a Situation Report on Handling of Locations with Littering Activities by DET (hereinafter

Note 46: *According to FEHD, apart from DETs, other teams such as the Hawker Control Teams and the Cleansing Teams also take enforcement actions against illegal dumping when performing their routine duties. Of the 35,750 FPNs issued in 2024, 20,366 (57%) FPNs were issued by DETs and 15,384 (43%) FPNs were issued by other teams.*

Note 47: *Of the 2,614 summons issued in 2024, as of January 2025, 1,209 (46.25%) were convicted cases (involving total fines of about \$4 million), 1 (0.04%) was an acquittal case and 1,404 (53.71%) cases were under processing.*

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referred to as situation report), which should be provided to Chief Health Inspectors for clearance on a bimonthly basis;

- (c) district management should explicitly look into those long outstanding and/or recurring cases and critically review the strategy in taking enforcement action and staff deployment (including the timing and frequency of enforcement operations) with a view to deleting them from the list as soon/far as practicable; and
- (d) the criteria for including locations with littering activities (in the past three months) in the situation report include identified top five hotspots under CMIS, number of justified complaints received, quantity of waste dumped at the locations, and frequent littering/illegal dumping activities reported at the locations.

3.6 *Scope for improvement in monitoring work programs of DETs.*

According to FEHD, the work programs set out the work covered by DETs and were maintained by individual DEHOs. However, FEHD had not specified in its guidelines the information to be included in the work programs. Audit visited three DEHOs (i.e. Eastern, Sham Shui Po and Yuen Long DEHOs — Note 48) to review the work of DETs and noted the following:

- (a) *Number of locations included in DETs' work programs varied significantly among DEHOs with similar number of DETs.* For the three DEHOs, Audit examined the work programs for 2024 (up to October) and noted the following:
 - (i) while the number of DETs under the purview of the three DEHOs was similar (i.e. 5 to 6 DETs as of October 2024), the number of locations (e.g. streets and public markets) selected for conducting daily inspection by DETs as shown in their work programs varied significantly (see Table 5);

Note 48: *Audit visited one DEHO from each of the three Operations Divisions with the largest number of DETs as at 30 September 2024 to review their operations.*

Table 5

**DETs' work programs of three DEHOs
(2024 (up to October))**

DEHO	As of October 2024		No. of locations selected for conducting daily inspection (Note)
	No. of DETs	No. of DET members	
Sham Shui Po	6	23	2 locations
Eastern	5	20	20 to 23 locations (averaging 22 locations)
Yuen Long	6	25	56 to 61 locations (averaging 58 locations)

Source: Audit analysis of FEHD records

Note: The work programs of DETs for Yuen Long and Eastern DEHOs were prepared for each month and that of Sham Shui Po DEHO was prepared for each day. According to the three DEHOs, the locations included in the work programs were selected for DETs to conduct inspection on a daily basis, and DETs were also required to perform ad hoc duties assigned by supervisors.

(ii) Audit examination of DETs' work programs of Sham Shui Po DEHO revealed that:

- the work programs had remained unchanged (i.e. only including the same 2 locations (i.e. two public markets and vicinity areas)) since late March 2023 (i.e. for about 1.6 years up to October 2024); and
- of the 6 DETs, only 2 DETs were assigned to carry out daily inspections at the 2 locations (the 6 DETs were assigned on a rotational basis). The work programs did not specify the daily work of the remaining 4 DETs.

Upon enquiry, FEHD informed Audit in March 2025 that the 2 locations were referring to the vicinity of Pei Ho Street Market and Po On Road Market which actually covered areas comprising 10 and 9 streets respectively, and were actually equivalent to

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19 individual locations in other DEHOs. However, Audit noted that the 19 streets covered under the 2 locations were not specified in the work programs; and

- (iii) Audit examination of DETs' work program of Yuen Long DEHO for October 2024 revealed that of the 57 locations selected for conducting daily inspection by DETs, 6 (11%) locations were planned for inspection by 2 different teams on the same day under the same work shifts for handling the same targeted type of offence (e.g. littering of bagged refuse). Upon enquiry, FEHD informed Audit in March 2025 that Yuen Long District was a complicated district, especially the town area, and inspection of a complicated area with joint efforts of two DETs was appropriate. The planned locations involved large areas, rather than a single spot, which justified the deployment of resources;

- (b) *Need to enhance documentation of work performed by DETs for monitoring compliance with work programs.* For the three DEHOs, Audit noted that documentation of the work performed by DETs varied, as follows:

- (i) the inspections conducted were summarised in computerised spreadsheets by Eastern and Sham Shui Po DEHOs and in emails by Yuen Long DEHO; and
- (ii) for the three DEHOs, the information recorded included the responsible DET, date of inspection and locations inspected. The number of FPNs issued was recorded by Yuen Long and Sham Shui Po DEHOs but not by Eastern DEHO. On the other hand, the time of inspection was recorded by Eastern and Yuen Long DEHOs but not by Sham Shui Po DEHO.

Audit also noted that for the three DEHOs, there was no documentation showing that the locations inspected were compared against those in the work programs of DETs for monitoring compliance; and

- (c) *Need to enhance guidelines on supervisory inspections on DETs' work.* According to FEHD guidelines, for staff performing outdoor duties, supervisors should conduct regular and random spot checks,

Division/Section Heads should issue clear instructions to prescribe the frequency and procedures for the checks, and details of the checks (such as date, time and outcome) should be fully documented. According to FEHD, the Health Inspectors carry out supervisory inspections on DETs' outdoor work. Audit noted that:

- (i) as of February 2025, the requirements (e.g. frequency) for supervisory inspections on DETs' work were not specified in FEHD guidelines or documented by Sham Shui Po and Yuen Long DEHOs. For Eastern DEHO, it was specified that the supervisory inspection should be conducted at least once every two months; and
- (ii) for Eastern, Sham Shui Po and Yuen Long DEHOs, in 2024 (up to October), 7, 12 and 17 supervisory inspections were conducted on the work of DETs respectively, and each team was selected for 1 to 8 times.

3.7 In Audit's view, FEHD needs to:

- (a) specify the information to be included in work programs of DETs in its guidelines;
- (b) enhance documentation of the work performed by DETs for monitoring compliance with the work programs; and
- (c) specify the requirements (e.g. frequency) for supervisory inspections on DETs' work in its guidelines and maintain documentation of the inspections conducted.

3.8 ***Scope for improving situation reports.*** The situation reports include details of locations with littering activities meeting specific criteria (see para. 3.5(d)) for monitoring by DETs, with details including address, reason and date of inclusion in the report, number of blitz operations mounted for the past three months and result of the operations. For the three DEHOs (see para. 3.6), Audit examined the situation reports for October 2024 and found room for improvement in the following areas:

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- (a) ***Some hotspots not included in situation reports.*** According to FEHD guidelines, CMIS identifies the hotspots on street cleansing complaints in each district on monthly basis and a monthly report with the identified top five hotspots will be sent to districts for formulating operational tactics. For the three DEHOs, while 39 locations were identified as the top five hotspots in CMIS reports in the period from July to September 2024 (i.e. with littering activities in the past three months — see para. 3.5(d)), 32 (82%) locations were not included in the situation reports for monitoring by DETs. Of the 32 locations, 3 (9%) locations had been identified as hotspots for three consecutive months preceding the issuance of situation report and other 3 (9%) locations for two consecutive months. Upon enquiry, FEHD informed Audit in March 2025 that:
- (i) some DEHOs had used an obsolete form for situation reports which had not included the criterion of including the top five hotspots in CMIS reports. FEHD had reminded DEHOs to use the latest version of the form; and
 - (ii) some hotspots might involve environmental hygiene issues that should not be handled by DETs (e.g. stains on ground) or should be explicitly handled by other teams (e.g. illegal cooked food hawkers). DEHOs would make their judgement to consider whether these locations were needed to be included in situation reports.

However, Audit noted that the considerations for not including the hotspots in the situation reports were not documented;

- (b) ***Need to consider including locations with frequent littering activities detected by IP cameras in situation reports.*** According to FEHD, the footage captured with IP cameras will go through artificial intelligence image analysis (see para. 3.13(a)), and reports for illegal refuse deposit identified will be generated on a weekly basis. DETs will organise blitz operations based on the intelligence collected from IP cameras. For the three DEHOs, Audit noted that:
- (i) while 49 locations were detected by IP cameras with illegal disposal of refuse in the three-month period (i.e. July to September 2024), 39 (80%) locations were not included in the situation reports; and

- (ii) in particular, 8 (21%) of the 39 locations had been reported with illegal disposal of refuse activities for over 500 to 2,141 times (averaging 1,170 times) (involving 565 to 2,570 (averaging 1,433) units of refuse) in the three-month period; and
- (c) *Need to review actions needed at locations included in situation reports for a long time.* Audit noted that 37 locations had been included in the situation reports of the three DEHOs for a long time, ranging from about 1.5 years to about 7.3 years (averaging about 3.6 years) in spite of the fact that 2 to 62 (averaging 6) blitz operations had been organised in the period from July to September 2024 for each location. Upon enquiry, FEHD informed Audit in March 2025 that these locations usually had inherent complicated environments associated with environmental hygiene issues and had long been regarded as being “Long-standing, Big and Difficult Problems”, and it would continue to deploy reasonable manpower to contain the situation in these locations.

3.9 FEHD had specified in its guidelines the requirements to include locations with littering activities and meeting specific criteria in situation reports as well as to review the strategy in taking enforcement action against long outstanding cases (see para. 3.5). In Audit’s view, FEHD needs to review the inspections and enforcement actions needed for locations with frequent littering activities and long outstanding cases in situation reports, and properly record the locations in situation reports for monitoring by DETs.

Need to review operations of DETs

3.10 As of December 2024, FEHD had 46 DETs with a total of 211 members. For each of the 19 DEHOs, the number of DETs ranged from 1 to 5 (averaging about 2.4 teams) and the number of members ranged from 4 to 24 (averaging about 11 members). According to FEHD, DETs are deployed to various littering black spots to take enforcement actions against public cleanliness offences to catch offenders red-handed for littering on the spot. Apart from prosecution, DETs also perform publicity and public education duties. Audit examined FEHD records for the work performed by DETs and noted the following:

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- (a) **Number of FPNs issued by DETs.** Audit examined the annual number of FPNs issued by DETs on the specified public cleanliness offences (see para. 3.2) and noted that from 2020 to 2024 (see Table 6):
- (i) the number of DET members increased by about 37% from 158 as at 31 December 2020 to 217 as at 31 December 2022, then decreased by about 17% to 180 as at 31 December 2023 and increased by about 17% to 211 as at 31 December 2024; and
 - (ii) the average number of FPNs issued by each DET member generally increased by about 37% from 105 in 2020 to 144 in 2023, and decreased by about 33% to 97 in 2024;

Table 6

**Number of FPNs issued by DETs
(2020 to 2024)**

Year	No. of FPNs issued (Note 1) (a)	No. of DETs as at 31 December (Note 2) (b)	No. of DET members as at 31 December (c)	Average no. of FPNs issued by each DET (d) = (a) ÷ (b)	Average no. of FPNs issued by each DET member (e) = (a) ÷ (c)
2020	16,520	35	158	472	105
2021	24,725	40	182	618	136
2022	28,704	52	217	552	132
2023	25,994	51	180	510	144
2024	20,366	46	211	443	97

Source: *Audit analysis of FEHD records*

Note 1: *According to FEHD, apart from the public cleanliness offences stated in paragraph 3.2, DETs also issued FPNs to offenders for committing the offence of obstruction of public places. In 2020 to 2024, DETs issued 0 to 9 (averaging about 5) FPNs for obstruction of public places annually, which were not included in this analysis.*

Note 2: *According to FEHD, each DET generally comprises 1 Senior Foreman and 4 Foremen.*

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(b) ***Number of black spots of refuse dumping dealt with by DETs.*** As shown in Table 7, in general, from 2020 to 2024:

- (i) the number of black spots of refuse dumping dealt with by DETs included in situation reports decreased by about 2% from 291 as at 31 December 2020 to 285 as at 31 December 2024; and
- (ii) the increase in the annual number of black spots of refuse dumping dealt with by DETs decreased by about 86% from 261 in 2020 to 36 in 2024, and the annual number of black spots eliminated or markedly improved also decreased by about 75% from 174 in 2020 to 44 in 2024.

In this connection, Audit noted that the number of complaints received by FEHD relating to the specified public cleanliness offences (see para. 3.2) generally decreased by about 4% from 54,367 in 2020 to 51,941 in 2024 (the related numbers in 2021, 2022 and 2023 were 61,262, 51,474 and 58,216 respectively); and

Table 7

**Number of black spots of refuse dumping dealt with by DETs
(2020 to 2024)**

Year	As at 31 December			Annual no. of black spots increased (d)	Annual no. of black spots eliminated or markedly improved (e)
	Accumulated no. of black spots (a)	Accumulated no. of black spots eliminated or markedly improved (b)	No. of remaining black spots (c) = (a) – (b)		
2020	843	552	291	261	174
2021	1,135	891	244	292	339
2022	1,204	917	287	69	26
2023	1,244	951	293	40	34
2024	1,280	995	285	36	44

Source: Audit analysis of FEHD records

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- (c) **Publicity work of DETs.** According to FEHD, records of DETs' work on publicity and public education were maintained by individual DEHOs. According to the three DEHOs (see para. 3.6), in 2023 and 2024, publicity work (e.g. publicities relating to the amendment of fixed penalty levels) was conducted for a total of 4 to 42 days for each DEHO.

3.11 Upon enquiry, FEHD informed Audit in March 2025 that:

- (a) from 2020 to 2023, Hong Kong suffered from the outbreak of the COVID-19 epidemic, which affected different human activities including DETs' enforcement work and illegal dumping acts; and
- (b) after the effective date of the new penalty levels, the number of FPNs issued against environmental hygiene offences such as littering decreased by over 30% to about 15,000. This reflected that the new penalty levels had a significant deterrent effect. A lot of extrinsic factors such as the public awareness of maintaining cleanliness and the deterrence effects over the strategically targeting enforcement actions also affected the number of FPNs issued by FEHD officers including DETs.

3.12 Audit noted that the penalty levels of FPNs had increased since 22 October 2023 (see para. 3.3), and the average number of FPNs issued by each DET member and the number of black spots of refuse dumping dealt with by DETs decreased generally from 2020 to 2024 (see para. 3.10(a) and (b)). On the other hand, the work programs of DETs varied among different DEHOs (see para. 3.6(a)). As of February 2025, no documentation was available showing that an evaluation on operations of DETs had been conducted. In view of the fact that DETs had been set up for more than 7 years (since June 2017) and the number of DET members increased by about 34% from 158 in 2020 to 211 in 2024 (Note 49), and the changes in the penalty levels of FPNs, Audit considers that it is opportune for FEHD to conduct a review on the operations of DETs and take follow-up actions as appropriate.

Note 49: *According to FEHD, of the 211 members as at 31 December 2024, 154 members were civil servants and 57 members were post-retirement service contract staff. Based on the Notional Annual Mid-point Salary or contract salary of these staff, the annual salary cost was estimated to be about \$66 million.*

Need to enhance monitoring of deployment of IP cameras

3.13 FEHD has installed IP cameras at illegal refuse deposit black spots through services contract (Note 50) to curb the illegal deposits of refuse in public places (Note 51). According to FEHD guidelines:

- (a) all footage captured with IP cameras will go through artificial intelligence image analysis by the contractor whereby illegal acts (e.g. refuse deposit) can be identified. Districts can analyse the timing and patterns of the illegal acts to formulate more effective enforcement operations;
- (b) based on the footage of fly-tipping from vehicles captured by IP cameras with sufficient evidence, districts should take prosecution action against the registered owners of the vehicles or relevant offenders; and
- (c) the criteria for installation of IP cameras include existence of persistent and recurring problems of illegal dumping of refuse and community support of the concerned District Council. Periodically, districts should review the target locations for installation of IP cameras and the perimeter view of individual IP cameras to ensure that they meet the monitoring purpose. Relocation of the IP cameras to new target locations should be strategically considered and arranged if significant improvement of certain existing target location(s) is/are observed.

3.14 The number of locations installed with IP cameras increased by about two times from 151 as of December 2019 to 470 as of December 2024. According to FEHD, the number of FPNs or summons issued based on information of individual

Note 50: *FEHD has outsourced the work on installation and operation of IP cameras. The current contract for the period from 1 September 2023 to 31 August 2025 was awarded to a contractor by open tender with a contract value of about \$16 million.*

Note 51: *For illegal dumping of construction waste in public places, the Environmental Protection Department (EPD) is mainly responsible for enforcing the Waste Disposal Ordinance (Cap. 354) and taking enforcement actions against the offenders, and EPD has installed surveillance camera systems at locations of illegal waste disposal. According to FEHD, it has collaborated with EPD to establish a sharing mechanism for footage captured by IP cameras installed by both departments since November 2023, and prosecutions will be instituted against illegal dumping of waste offences captured by respective IP cameras under the corresponding department regardless of the waste type concerned.*

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IP cameras with operating status was not readily available (see also para. 4.11(f)). Audit examined the records of the three DEHOs (see para. 3.6) and noted that 141 locations under their purview had been installed with IP cameras as of December 2024. For the deployment of IP cameras by the three DEHOs, Audit noted the following:

- (a) ***Need to review locations installed with operating IP cameras but with no or few FPNs or summons issued.*** As of December 2024, 45 locations had been installed with operating IP cameras for more than six months. In the period from 2022 to 2024, for each location, the number of FPNs or summons issued ranged from 0 to 341 (averaging about 44) (see Table 8). For 7 (16%) locations, no FPN or summons was issued in the three-year period (the operating period of the IP cameras ranged from 10 months to about 2.8 years, averaging about 1.8 years); and

Table 8

Number of FPNs or summons issued at locations installed with operating IP cameras for more than six months (2022 to 2024)

No. of FPNs or summons issued	No. of locations (Note)			
	Eastern DEHO (a)	Sham Shui Po DEHO (b)	Yuen Long DEHO (c)	Total (d) = (a) + (b) + (c)
0	—	2	5	7
1 to 10	—	10	1	11
11 to 50	1	7	8	16
51 to 100	1	—	4	5
101 to 150	—	—	4	4
151 to 200	—	—	1	1
341	—	—	1	1
Total	2	19	24	45

Source: Audit analysis of FEHD records

Note: As of December 2024, on average, the IP cameras at the 45 locations had been operating for about 2.2 years in the period from 2022 to 2024.

- (b) *Some illegal refuse deposit black spots not installed with operating IP cameras.* As of October 2024, 37 locations had been included in the situation reports of the three DEHOs for a long time (ranging from about 1.5 years to about 7.3 years) (see para. 3.8(c)). Audit noted that 23 (62%) locations had not been installed with operating IP cameras.

3.15 Upon enquiry, FEHD informed Audit in March 2025 that:

- (a) for those locations installed with operating IP cameras but with no or few FPNs or summons issued (see para. 3.14(a)), some cameras were for achieving a continuous deterrent effect with a comparatively low recurrent cost; and
- (b) for those illegal refuse deposit black spots not installed with operating IP cameras (see para. 3.14(b)), each case should be considered on its own merit, and substantial improvement on hygienic condition did not necessarily require the deployment of all enforcement tools.

However, documentation of the periodic review with the considerations for not relocating those IP cameras with no or few FPNs or summons issued (see (a) above) or not installing IP cameras at some illegal refuse deposit black spots (see (b) above) was not available.

3.16 According to FEHD guidelines, the timing and patterns of the illegal acts can be analysed based on information of IP cameras for formulating more effective enforcement operations, and districts should periodically review the target locations for installation and relocation of IP cameras (see para. 3.13(a) and (c)). In Audit's view, FEHD needs to take measures to require DEHOs to periodically review the deployment (including installation, dismantlement and relocation) of IP cameras in accordance with its guidelines.

Scope for improving environmental hygiene of problematic spots

3.17 Audit conducted site visits to 10 locations with environmental hygiene problems (hereinafter referred to as problematic spots — Note 52) under the purview of the three DEHOs (see para. 3.6) in the period from December 2024 to February 2025. For each problematic spot, three site visits (one in December 2024/January 2025 and the other two in February 2025 (in the morning and afternoon of the same day)) were conducted.

3.18 *Environmental hygiene problems found in some problematic spots and their adjacent areas.* For the 10 problematic spots (see para. 3.17), Audit's site visits found the following:

- (a) for 2 (20%) problematic spots (under the purview of Yuen Long DEHO), Audit found environmental hygiene problems at the locations during the three site visits (see Problematic Spot A in Photograph 4 for an example); and
- (b) for other 2 (20%) problematic spots (under the purview of Sham Shui Po DEHO and of Yuen Long DEHO), while environmental hygiene problems were not always found at the spots (found in two visits for one spot and not found in all three visits for the other spot), the problems were found in areas adjacent to the problematic spots (i.e. at the locations within sight of the problematic spots) during the three site visits (see the adjacent area to Problematic Spot B in Photograph 5 for an example).

Note 52: *The problematic spots selected were based on the locations included in situation reports for October 2024 (see para. 3.8), the top five hotspots in CMIS reports in the period from July to September 2024 (see para. 3.8(a)) and the locations installed with IP cameras as of December 2024 (see para. 3.14). Each problematic spot selected by Audit referred to a specific location or street.*

Photograph 4

Environmental hygiene conditions of Problematic Spot A



Source: Photograph taken by Audit staff on Wednesday, 5 February 2025 (at 4:33 p.m.)

Photograph 5

Environmental hygiene conditions of adjacent area to Problematic Spot B



Source: Photograph taken by Audit staff on Tuesday, 7 January 2025 (at 5:11 p.m.)

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3.19 *Scope for enhancing actions against obstruction to cleansing operations.*

Under section 22 of the Public Health and Municipal Services Ordinance, any person obstructs, or causes or permits any article to be so placed as to obstruct or to be likely to obstruct any cleansing operations shall be guilty of an offence. FEHD may serve the owner of such article or attach to such article a notice requiring removal within four hours after the notice is served or attached, and seize and detain such article if it is not removed or is found causing obstruction within the period specified in the notice. According to FEHD guidelines:

- (a) obstruction is primarily a question of fact and has to be determined with reference to the surrounding circumstances. District management should from time to time, review the enforcement strategy to take a more proactive approach against those persistent and serious cases; and
- (b) for cases under the jurisdiction of other departments, referrals should be made to the concerned departments for their appropriate action.

3.20 For the 10 problematic spots (see para. 3.17), Audit found environmental hygiene problems at 2 problematic spots and 2 adjacent areas to the problematic spots during the three site visits (see para. 3.18). For the 4 locations, Audit noted that no notice for removal of obstruction was attached to the articles in all three site visits. The time lapse between the second and third site visits (conducted on the same day) ranged from about 4 to 5 hours.

3.21 Upon enquiry, FEHD informed Audit in March 2025 that:

- (a) the 4 locations selected by Audit were adjacent to public markets or clusters of fresh provision shops, and the environmental hygiene problems observed by Audit concerned the accumulation of styrofoam boxes or carton boxes generated by the operations of the markets and shops. These styrofoam boxes or carton boxes were not waste, but were recyclable or reusable. Typically, scavengers collected these materials from markets and shops, sorted them on the street, and passed them to recycling operators. At times these materials might stay on the street for a period of time;
- (b) recognising the value of recycling activities, and that many scavengers were grassroots or elderly citizens, it had been adopting a flexible approach towards them. Instead of taking strict enforcement action, FEHD would

monitor the hygiene condition and where necessary, remind scavengers to review their operational mode, minimise the nuisance and avoid piling up articles on busy streets for long periods. Many scavengers were cooperative, and would move their operations to less busy areas, which could be a reason why Audit found those materials in adjacent areas to the problematic spots. In addition, FEHD would step up street cleansing services at locations with active recycling activities; and

- (c) it would carefully balance the need to facilitate recycling activities and upkeep environmental hygiene in public places in consultation with relevant departments.

3.22 Audit noted that the 10 problematic spots had been monitored by FEHD (through DETs or IP cameras — see Note 52 to para. 3.17), and the articles so placed would obstruct or likely to obstruct street cleansing operations. In Audit's view, FEHD needs to review the current measures of improving street cleanliness of locations with persistent hygiene problems in public places. For cases involving obstruction to street cleansing operations and relating to broader street management issues, FEHD needs to keep under review the street cleanliness of the locations and take appropriate follow-up actions.

Audit recommendations

3.23 Audit has *recommended* that the Director of Food and Environmental Hygiene should:

- (a) **specify the information to be included in work programs of DETs in FEHD guidelines;**
- (b) **enhance documentation of the work performed by DETs for monitoring compliance with the work programs;**
- (c) **specify the requirements (e.g. frequency) for supervisory inspections on DETs' work in FEHD guidelines and maintain documentation of the inspections conducted;**

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- (d) **review the inspections and enforcement actions needed for locations with frequent littering activities and long outstanding cases in situation reports, and properly record the locations in situation reports for monitoring by DETs;**
- (e) **conduct a review on the operations of DETs and take follow-up actions as appropriate;**
- (f) **take measures to require DEHOs to periodically review the deployment (including installation, dismantlement and relocation) of IP cameras in accordance with FEHD guidelines;**
- (g) **review the current measures of improving street cleanliness of locations with persistent hygiene problems in public places; and**
- (h) **for cases involving obstruction to street cleansing operations and relating to broader street management issues, keep under review the street cleanliness of the locations and take appropriate follow-up actions.**

Response from the Government

3.24 The Director of Food and Environmental Hygiene agrees with the audit recommendations. He has said that FEHD:

- (a) has enhanced documentation and guidelines on DETs' work and will further review DETs' operations;
- (b) has reminded staff to review the deployment of IP cameras quarterly;
- (c) will review the current measures with a view to improving street cleanliness in locations with persistent hygiene problems in public places; and
- (d) will continue to carefully balance the need to facilitate recycling activities and upkeep environmental hygiene in public places in consultation with relevant departments.

Other issues relating to enforcement actions

Scope for enhancing guidelines in taking enforcement actions against repeated offenders

3.25 According to FEHD guidelines, if the offender is a repeated offender (e.g. the offender has three similar contraventions, including prosecutions by way of summons or issuance of FPNs), the enforcement officers may consider taking prosecution actions by way of summons (Note 53) instead of by issuance of FPNs.

3.26 Audit examined the number of FPNs issued by FEHD for the specified public cleanliness offences from 2020 to 2024 based on records of the Fixed Penalty Computer System (FPCS) and noted the following:

- (a) of the total 223,347 FPNs issued, 20,743 (9%) FPNs were issued to 3,742 repeated offenders (issued with 3 or more FPNs for the same/similar type of offence). The number of FPNs issued to each repeated offender ranged from 3 to 111 FPNs (averaging about 6 FPNs) (see Table 9); and

Note 53: *If situation warrants, FEHD may consider applying to the court for handing down penalties under the summons system. For example, the maximum penalty levels that the court may impose for the offences of: (a) display of bills or posters without permission: a fine at level 3 (\$10,000) and daily fine of \$300; and (b) depositing of litter or waste in public places: a fine at level 4 (\$25,000) and imprisonment for 6 months.*

Table 9

**Number of FPNs issued to repeated offenders
(2020 to 2024)**

Type of offences	No. of repeated offenders (Note 1) (a)	No. of FPNs issued (b)	Average no. of FPNs issued to each offender (c) = (b) ÷ (a)	Range of no. of FPNs issued to each offender (d)
(a) Display of bills or posters without permission	810	10,939	14	3 to 111
(b) Littering (i.e. deposition of litter or waste in public places, unlawful depositing of waste or marine littering — Note 2)	2,920	9,767	3	3 to 41
(c) Spitting in public places	12	37	3	3 to 4
Overall	3,742	20,743	6	3 to 111

Source: Audit analysis of FEHD records

Note 1: A repeated offender referred to an offender issued with 3 or more FPNs for the same/similar type of offence. The same offender issued with 3 or more FPNs for another type of offence would be counted as a separate repeated offender in this analysis.

Note 2: According to FEHD records, deposition of litter or waste in public places, unlawful depositing of waste and marine littering are grouped as the same type of offence (i.e. littering).

- (b) Audit further examined the records of the 5 repeated offenders issued with the highest number of FPNs for each type of offences mentioned in Table 9 (i.e. a total of 15 repeated offenders for the three types of offences). While prosecution actions by way of summons may be taken against repeated offenders in accordance with FEHD guidelines (see para. 3.25), no summons had been issued against the 15 repeated offenders from 2020 to 2024.

3.27 Audit noted that while some offenders had committed the same offences for quite a number of times (see para. 3.26), FEHD had not taken prosecution actions against them by way of summons in accordance with its guidelines (see para. 3.25).

According to FEHD, the officers could only verify whether the offenders were repeated offenders after they got back to office, but not on the spot. In light of the limitations of the current approach in identifying repeated offenders, Audit considers that FEHD needs to review its guidelines on enforcement actions against repeated offenders of public cleanliness offences.

Need to review guidelines for supervisory checks of FPNs issued

3.28 According to FEHD guidelines:

- (a) when the enforcement officers witness the commission of the specified public cleanliness offences, they will serve FPNs (in manual form) to the offenders on the spot. After returning to the district office, the enforcement officers should report the issue of FPN into FPCS. The FPN cases should be checked and endorsed by vetting officers in FPCS (Note 54); and
- (b) the Section Heads are required to conduct random checking of their staff's FPN booklets and arrange sample checking of the issued FPNs to FPCS not less than once in every three months to ensure that all FPNs are issued in a proper manner.

3.29 Audit noted that the sampling methodology and the number of samples required for the supervisory checks (see para. 3.28(b)) were not specified in FEHD guidelines. Audit examined the records of the three DEHOs (see para. 3.6) for 2024 and noted that their practices of supervisory checks varied, as follows:

- (a) for Sham Shui Po, Eastern and Yuen Long DEHOs, 4, 12 and 15 supervisory checks (involving 11, 60 and 52 FPNs) were conducted for DETs in 2024 respectively. For each checking, while 5 FPNs were selected from the same DET member for Eastern DEHO, 1 to 7 FPNs were selected

Note 54: *According to FEHD guidelines, if an offender fails to pay within 21 days from the date of the issue of an FPN, FPCS will generate a demand notice. FEHD's Prosecution Section will issue the demand notice, requiring the offender to pay the penalty within 10 days. If no payment is received within the deadline, the Prosecution Section will follow up the case and can apply for court order for payment of fixed penalty.*

Tackling illegal disposal of refuse

from different DET members for Sham Shui Po and Yuen Long DEHOs; and

- (b) the percentages of DET members selected for supervisory checks in 2024 for Sham Shui Po, Eastern and Yuen Long DEHOs were 26% (i.e. 6 of total 23 members as of December 2024), 53% (i.e. 9 of total 17 members as of December 2024) and 79% (i.e. 19 of total 24 members as of December 2024) respectively. For the three DEHOs, 12 members had been selected for 2 to 3 times.

Audit also noted that there was no documentation of the rationale for the sampling methodology adopted by each DEHO.

3.30 Upon enquiry, FEHD informed Audit in March 2025 that as every issued FPN had been checked by the supervisors of the enforcement officers, it was planning to streamline the procedures by eliminating the requirement on the supervisory checks by Section Heads on the issued FPNs in the guidelines. In Audit's view, FEHD needs to timely update and promulgate its guidelines on public cleanliness offences for the supervisory checks on FPNs issued after confirming the elimination of the relevant requirement.

Scope for exploring use of information technology in taking enforcement actions

3.31 Audit noted that when witnessing the commission of public cleanliness offences, FPNs served were in manual form and details of FPNs were needed to be input into FPCS after returning to the district office (see para. 3.28(a)). Upon enquiry, FEHD informed Audit in mid-March 2025 that it would launch a trial in selected districts in late-March 2025 under which enforcement officers would be able to print out FPNs by using mobile devices. In Audit's view, with a view to enhancing efficiency, FEHD needs to explore the use of information technology to facilitate enforcement officers in issuing FPNs to the offenders on the spot.

Audit recommendations

3.32 Audit has *recommended* that the Director of Food and Environmental Hygiene should:

- (a) review FEHD guidelines on enforcement actions against repeated offenders of public cleanliness offences;
- (b) timely update and promulgate FEHD guidelines on public cleanliness offences for the supervisory checks on FPNs issued after confirming the elimination of the relevant requirement; and
- (c) explore the use of information technology to facilitate enforcement officers in issuing FPNs to the offenders on the spot.

Response from the Government

3.33 The Director of Food and Environmental Hygiene agrees with the audit recommendations. He has said that FEHD:

- (a) will review the guidelines on enforcement actions against repeated offenders;
- (b) has reviewed guidelines on supervisory checks on FPNs issued; and
- (c) has commenced a trial in selected districts under which enforcement officers will be able to print out FPNs by using mobile devices.

Publicity work

3.34 According to FEHD, with regard to publicity and health education, it seeks to raise public awareness of environmental hygiene through various channels, including press releases, the social media platform pages of Keep Clean Ambassador Ah Tak, broadcast of Announcements in the Public Interest on television and radio, as well as display of posters and banners at Government venues (e.g. public markets and public toilets) and main public transport facilities (e.g. Mass Transit Railway stations and bus stops).

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Scope for strengthening work in promoting street cleanliness

3.35 During Audit's site visits to the 10 problematic spots in the period from December 2024 to February 2025, environmental hygiene problems were found in some spots (see para. 3.18) and that:

- (a) posters, banners or notices for warning against street cleanliness offences were displayed in 9 (90%) spots but not in 1 (10%) spot; and
- (b) for 2 (22%) of the 9 spots with posters, banners or notices displayed, environmental hygiene problems were found during all three site visits (see Problematic Spots A and C in Photographs 6 and 7). In this connection, Audit's site visits also found that in a location, the notice displayed was outdated (i.e. fixed penalty level stated in the notice was \$1,500 instead of \$3,000 or \$6,000 — see para. 3.3).

Photograph 6

Problematic Spot A with banners displayed and environmental hygiene problems



Source: Photograph taken by Audit staff on Tuesday, 7 January 2025 (at 4:30 p.m.)

Photograph 7

**Problematic Spot C with banners displayed
and environmental hygiene problems**



*Source: Photograph taken by Audit staff on
Wednesday, 5 February 2025 (at 11:13 a.m.)*

3.36 Upon enquiry, FEHD informed Audit in March 2025 that there might be site-specific constraints (e.g. absence of suitable fixtures) at some problematic sites and therefore, professional judgement was needed in determining whether the posting of notice/banner was required at each location. In view of the environmental hygiene problems identified by Audit in site visits (see para. 3.18), and the long-standing littering problems of some locations (see para. 3.8(c)), FEHD needs to continue to strengthen the work in promoting street cleanliness. FEHD also needs to take measures to enhance the display of posters, warning banners and notices against street cleanliness offences at suitable locations, including displaying up-to-date ones and removing outdated ones.

Audit recommendations

3.37 Audit has *recommended* that the Director of Food and Environmental Hygiene should:

- (a) continue to strengthen the work in promoting street cleanliness; and
- (b) take measures to enhance the display of posters, warning banners and notices against street cleanliness offences at suitable locations, including displaying up-to-date ones and removing outdated ones.

Response from the Government

3.38 The Director of Food and Environmental Hygiene agrees with the audit recommendations. He has said that FEHD:

- (a) will continue to strengthen the work in promoting street cleanliness through various channels; and
- (b) has reminded staff to enhance the display of warning materials at target locations and replace outdated materials.

PART 4: OTHER RELATED ISSUES

4.1 This PART examines other issues relating to the provision of street cleansing services, focusing on the following areas:

- (a) performance measurement (paras. 4.2 to 4.10);
- (b) management information for monitoring street cleansing services (paras. 4.11 to 4.14);
- (c) application of technologies in street cleansing services (paras. 4.15 to 4.22);
and
- (d) issues related to non-skilled workers (paras. 4.23 to 4.30).

Performance measurement

4.2 FEHD has set performance targets in its Controlling Officer's Report (COR) and performance pledges on its website. Table 10 shows the performance measures (including targets and pledges) on street cleansing services in 2019 to 2023. According to FEHD, all the performance measures were met in these five years.

Table 10

Performance measures on street cleansing services
(2019 to 2023)

Performance measure	Target/ pledge	Actual				
		2019	2020	2021	2022	2023
<i>COR</i>						
1. Completion of first round street sweeping services on main roads before 9:00 a.m. to ensure removal of over-night street litter	99 %	100 %	100 %	100 %	100 %	100 %
<i>FEHD's website</i>						
2. To sweep streets and empty litter bins at least 4 times daily in built-up areas and up to a frequency of 8 times daily in very busy locations or black spots	95 %	100 %	100 %	100 %	100 %	100 %
3. To wash streets on a need basis, at least once a week in busy areas, and at least 2 times weekly in problematic areas/black spots	97 %	100 %	100 %	100 %	100 %	100 %

Source: COR and FEHD records

***Need to enhance reporting mechanism of
performance measures on street cleansing services***

4.3 According to FEHD guidelines, in reporting the achievement of performance measures, DEHOs shall ensure accuracy and reliability of data, and submit monthly and quarterly returns for the performance measures in COR and on FEHD's website, respectively, through the Environmental Hygiene Statistical Information System (EHSIS — Note 55). For example, in the monthly return for the performance measure in COR (see item 1 in Table 10 in para. 4.2), each DEHO is required to input data in three data fields (i.e. the number of main roads with the first round street sweeping services to be completed before 9:00 a.m., the number of working days in the month, and the number of days with under-performance on main roads). According to FEHD, based on the respective DEHO's input in the three data

Note 55: *EHSIS maintains statistical information for street cleansing services, among others, for district management to review the effectiveness of various cleansing operations of the districts, and to map out and refine district's operations ahead.*

fields in the returns (Note 56), the achievement of performance measures for each DEHO is automatically calculated by EHSIS (Note 57). The overall achievement of performance measures is compiled automatically by EHSIS by taking average of the achievement of DEHOs in respective year.

4.4 ***Room for improvement in reporting achievement of performance measures on street sweeping services.*** Regarding the reporting of the performance measure on street sweeping services in COR and on FEHD's website (see items 1 and 2 in Table 10 in para. 4.2), Audit examined the monthly and quarterly returns submitted by DEHOs and found that:

- (a) ***19 DEHOs.*** For the performance measure in COR, some information in 47 (4%) of 1,140 returns was not available (i.e. data was not input in one or two data fields in 44 and 3 returns respectively) in the period from 2019 to 2023. For example, in the monthly returns of Kwun Tong DEHO for September and October 2021 and Sha Tin DEHO for December 2021, only the numbers of working days in the months were input. Based on the information reported in DEHOs' returns, the achievement of 100% of the performance measure in COR could not be ascertained; and
- (b) ***3 DEHOs visited by Audit.*** Audit further examined the records of the three DEHOs (see para. 2.4) of December 2023 and noted that while the achievement was reported by the three DEHOs (Note 58) as 100% in the

Note 56: *According to FEHD, in reporting the achievement of performance measures, each DEHO inputs data in the three data fields based on the information of both outsourced and in-house street cleansing services as there is no separate return made for each of them in EHSIS.*

Note 57: *For example, the achievement of the performance measure in COR for each DEHO is calculated based on:*

$$1 - \frac{\text{Number of days with under-performance on main roads} \times \text{Number of days}}{\text{Number of main roads with the first round street sweeping services to be completed before 9:00 a.m.} \times \text{Number of working days in the month}} \times 100\%$$

Note 58: *According to FEHD, for Sham Shui Po and Yuen Long DEHOs, service locations relating to main roads, built-up areas and very busy locations/black spots were all located in outsourced areas (i.e. the achievement of performance measures on street sweeping services was reported based on information of outsourced street sweeping services).*

respective monthly and quarterly returns, the actual achievement of the performance measures on street sweeping services in COR and on FEHD's website in the month was not ascertainable. For example, while workmen should be providing street sweeping services at the assigned beats which were planned based on the time standards (see para. 2.22(a)), some workmen of Central/Western DEHO were assigned to provide street sweeping services in more than one beat within a work shift (see para. 2.22(a)(ii)). In this connection, each workman concerned performed only part of the duties for each beat involved within the work shift. On the other hand, FEHD adopted an outcome-based approach (i.e. services were assumed if no exception report was raised — see para. 4.5(a)) in reporting of achievement of performance measures. As such, whether the stipulated timeframe (i.e. before 9:00 a.m. on main roads) and required frequency (i.e. at least 4 times daily in built-up areas and up to a frequency of 8 times daily in very busy locations or black spots) had been achieved could not be ascertained. Also, the requirement of completing first round street sweeping services on main roads before 9:00 a.m. was not laid down in FEHD guidelines.

4.5 Upon enquiry, FEHD informed Audit in March 2025 that:

- (a) the street cleansing service contracts had stipulated the requirements on the completion time of first round street sweeping services before 9:00 a.m. and the frequencies of services for each service location. In this connection, in reporting of achievement of the performance measure on street sweeping services in COR and on FEHD's website, FEHD adopted a cost-effective outcome-based approach backed by risk-based monitoring inspection system (see para. 2.3). Specifically, street sweeping services were assumed if cleansing workmen did not raise any exception report of service failure. Supervisory/inspecting officers would conduct risk-based and random checks on the cleansing conditions after sweeping (e.g. on main roads before 9:00 a.m.). It was considered that the established targets had been met if no non-compliance of performance requirements had been reported;
- (b) the duties of each workman involving in more than one beat within a work shift would be thinned out to achieve the performance measure for street sweeping services on main roads before 9:00 a.m.; and

- (c) the findings of FEHD staff through various types of prevailing monitoring inspections would also serve to assess and evaluate the overall performance so as to deduce whether the performance achievement could be met.

4.6 While noting FEHD's explanations, Audit noted that there were instances where Senior Foremen of FEHD reviewed the contractors' daily attendance records but were unaware of their non-compliances with contract terms prior to Audit enquiry (see para. 2.7) and some monitoring inspections were not conducted in accordance with the stipulated frequencies and coverage (see paras. 2.11 and 2.24). In Audit's view, FEHD needs to:

- (a) enhance EHSIS to monitor the completeness of information in the returns for performance measures;
- (b) enhance the reporting mechanism of the performance measures on street sweeping services; and
- (c) lay down the requirement for completing first round street sweeping services on main roads before 9:00 a.m. for in-house street cleansing services in its guidelines.

4.7 ***Room for improvement in reporting achievement of performance measure on street washing services.*** Regarding the reporting of the performance measure "to wash streets on a need basis, at least once a week in busy areas, and at least 2 times weekly in problematic areas/black spots" (see item 3 in Table 10 in para. 4.2), Audit examined the quarterly returns submitted by DEHOs in the period from 2019 to 2023 and found that:

- (a) ***19 DEHOs.*** The quarterly returns only required the reporting of achievement of washing streets at least once a week. In other words, the achievement of washing streets "on a need basis" and "at least 2 times weekly" was not required to be reported in DEHOs' returns. In this regard, based on the information reported in DEHOs' returns, the achievement of 100% of the performance measure on street washing services on FEHD's website could not be ascertained; and

Other related issues

- (b) **3 DEHOs visited by Audit.** Audit further examined the records of the three DEHOs and noted that the number of streets to be washed at least once a week stated in the returns (i.e. 92) submitted by one (i.e. Yuen Long DEHO) of the three DEHOs was different from those in the list of busy areas maintained by the DEHO concerned (i.e. 109). Upon enquiry, FEHD informed Audit in March 2025 that the list had been revised by removing 6 venues managed by FEHD and 11 redundant records to align the number of streets in the list with those in the returns.

4.8 In Audit's view, FEHD needs to:

- (a) review the design of the return to facilitate the reporting of achievement of performance measure on street washing services;
- (b) enhance the reporting mechanism of the performance measure on street washing services; and
- (c) take measures to check the consistencies between the number of streets in the returns of performance measure on street washing services and those in the lists of busy areas maintained by individual DEHOs.

Audit recommendations

4.9 **Audit has *recommended* that the Director of Food and Environmental Hygiene should:**

- (a) **enhance EHSIS to monitor the completeness of information in the returns for performance measures;**
- (b) **enhance the reporting mechanism of the performance measures on street cleansing services;**
- (c) **lay down the requirement for completing first round street sweeping services on main roads before 9:00 a.m. for in-house street cleansing services in FEHD guidelines;**

- (d) **review the design of the return to facilitate the reporting of achievement of performance measure on street washing services; and**
- (e) **take measures to check the consistencies between the number of streets in the returns of performance measure on street washing services and those in the lists of busy areas maintained by individual DEHOs.**

Response from the Government

4.10 The Director of Food and Environmental Hygiene agrees with the audit recommendations. He has said that FEHD has enhanced EHSIS and reviewed relevant guidelines to facilitate comprehensive and accurate reporting of information on performance.

Management information for monitoring street cleansing services

4.11 In PARTs 2 and 3 of this Audit Report, Audit noted non-compliances with contracts by outsourced contractors and inadequacies in FEHD's monitoring of street cleansing services. In this connection, Audit noted that some management information (e.g. highlights or summaries) was not readily available or regularly compiled, for example:

- (a) compliances with staff attendance requirement and the requirements for conducting self-discipline quality inspections for outsourced street cleansing services (see paras. 2.6 and 2.9);
- (b) compliance with FEHD guidelines for in-house street cleansing services, including staff attendance requirement and approved work programmes (see para. 2.22);
- (c) compliance with the stipulated frequencies, timeframes and coverage for conducting monitoring inspections and submitting and reviewing the related reports (see paras. 2.11, 2.12, 2.24 and 2.28);
- (d) compliance with the work programs of DETs (see para. 3.6(b));

Other related issues

- (e) the locations with littering activities monitored by DETs of all DEHOs with aging analysis on duration of their inclusion in situation reports (see para. 3.8(c)); and
- (f) the number of FPNs or summons issued based on information of individual IP cameras with operating status (see para. 3.14).

4.12 In Audit's view, to facilitate the monitoring of performance of all DEHOs, FEHD needs to regularly compile the relevant management information to facilitate its monitoring work and evaluation of the enforcement figures against public cleanliness offences.

Audit recommendation

4.13 Audit has *recommended* that the Director of Food and Environmental Hygiene should regularly compile management information for monitoring delivery of street cleansing services for all DEHOs and the enforcement figures against public cleanliness offences.

Response from the Government

4.14 The Director of Food and Environmental Hygiene agrees with the audit recommendation. He has said that FEHD will follow up on this recommendation.

Application of technologies in street cleansing services

4.15 According to FEHD, it has been strengthening environmental hygiene and street cleansing through a multi-pronged approach, including adopting new technologies for mechanical and automated cleansing to enhance the quality and efficiency of street cleansing services. It reviews and conducts market survey on whether there is any new technological development in street cleansing services from time to time. However, the adoption of new vehicles and equipment in street cleansing services depends on operational needs and budget availability. As of December 2024, major vehicles used by contractors and in-house staff in street cleansing services included 11 mechanical street sweepers, 85 street washing vehicles, 63 mini-street washing vehicles (see para. 4.17(a)) and 5 gully emptiers.

Need to continue to explore wider use of technologies in delivering street cleansing services

4.16 According to FEHD, subject to the compatibility with the existing street cleansing service contracts, technologies that have proven to be effective after testing on various fronts are applied through entering into separate bulk service contracts (i.e. mechanical street sweeping services and mechanical gully cleansing services — see para. 1.9) for territory-wide application or incorporating into the street cleansing service contracts in the form of contractual provisions.

4.17 Audit noted the following issues:

- (a) ***No contractual requirement for using mini-street washing vehicles.*** According to FEHD, using mini-street washing vehicles with pressure washer surface cleaners (see Photograph 8) can reduce manual cleansing and enhance cleansing efficiency (e.g. the pressure washer surface cleaners can remove stubborn stains speedily). Audit noted that:
 - (i) in May 2021, FEHD informed the Subcommittee on Issues Relating to the Improvement of Environmental Hygiene and Cityscape of the Panel on Food Safety and Environmental Hygiene of the Legislative Council that for street cleansing service contracts renewing from July 2018, mini-street washing vehicles with pressure washer surface cleaners were required to be used by contractors under the newly added contractual provisions; and
 - (ii) of 50 street cleansing service contracts (commencing on or after 1 January 2022) as of December 2024, 9 (18%) did not require the contractors to use mini-street washing vehicles with pressure washer surface cleaners.

Upon enquiry, FEHD informed Audit in March 2025 that while 9 contracts did not provide mini-street washing vehicles with pressure washer surface cleaners, the services were covered by other street cleansing contracts of the same district. All districts (except the outlying islands of Islands District) had used mini-street washing vehicles under the contracts as the contract provisions would allow cross-contract mobilisation of the mini-street washing vehicles to respond to operational needs within each district for optimised deployment of resources. For outlying islands, high

Other related issues

pressure hot water cleaners would be deployed for providing street washing services; and

Photograph 8

Mini-street washing vehicle with pressure washer surface cleaner



Source: FEHD records

- (b) ***Mini-street washing vehicles with pressure washer surface cleaners not used by in-house staff.*** As of December 2024, all 63 mini-street washing vehicles were used by contractors (i.e. no mini-street washing vehicle was used by FEHD) to provide street washing services on a routine and need basis. Audit examined the relevant documents of Sham Shui Po and Yuen Long DEHOs (Note 59) for December 2023 and September 2024, and noted that while the street cleansing service contracts stipulated that FEHD should have the right to direct the contractors to provide the street washing services in any other locations in the districts covered by the respective contracts (i.e. the mini-street washing vehicles can be deployed to the in-house areas of Sham Shui Po and Yuen Long districts), there was no documentation showing that this had been done. Upon enquiry, FEHD informed Audit in March 2025 that:

Note 59: *As of December 2024, for Central/Western DEHO, no street washing services were provided by in-house staff (i.e. fully outsourced).*

- (i) for Sham Shui Po and Yuen Long districts, areas most in need of services were located in the outsourced areas and the service need of mini-street washing vehicles for the in-house areas was minimal; and
- (ii) based on the ground situation, DEHOs should gainfully deploy their resources to the most concerned areas in the districts. Some DEHOs might deploy the mini-street washing vehicles to the outsourced areas instead of in-house areas as the need of street washing using mini-street washing vehicles should be higher in outsourced areas in general.

4.18 According to FEHD, the number of service locations using mini-street washing vehicles had been increased from approximately 1,750 in January 2024 to approximately 3,600 in March 2025 across the territory. Also, using mini-street washing vehicles with pressure washer surface cleaners can reduce manual cleansing and enhance cleansing efficiency (see para. 4.17(a)). In this connection, there is merit for FEHD to continue to explore the wider use of technologies in delivering street cleansing services (including the deployment of mini-street washing vehicles to outsourced areas and in-house areas as appropriate).

Need to explore the use of technologies in monitoring service delivery

4.19 Audit noted the following issues:

- (a) ***Lot of manual procedures involved in monitoring delivery of street cleansing services.*** DEHOs relied heavily on paper-based documents submitted by contractors to monitor the delivery of street cleansing services. In particular, contractors were required to submit a work programme (containing planned beats/routes) and a work report (containing actual beats/routes) for each day to FEHD for vetting to ensure the satisfactory performance of the services (e.g. carrying out services in accordance with the work programmes). Similarly, the work programmes and reports of in-house street cleansing services were also kept in paper forms. The manual vetting procedures involved were resource intensive, time consuming and prone to errors (see paras. 2.7 and 2.22);

- (b) ***Coverage of some streets in daily inspections not ascertainable.*** According to FEHD, Senior Foremen and Foremen/Overseers (for monitoring outsourced and in-house street cleansing services respectively) are provided with official smart phones that can be used in taking photographs, inputting key locations (Note 60) inspected and submitting written reports of daily inspections (see para. 2.3(a)). The smart phones are installed with an information system (i.e. the Contract Management System (CMS — Note 61) for use by Senior Foremen or EMS for use by Foremen/Overseers). According to FEHD guidelines, the broad principle of street cleansing services is to cover each and every part of the district (see para. 1.9). Audit examined CMS and EMS records of the three DEHOs (see para. 2.4) of September 2024 and noted that no photograph was taken for some streets (e.g. 17 (37%) of 46 streets in Central/Western DEHO) during daily inspections as these streets might not have any key locations (i.e. whether these streets were inspected could not be readily ascertained); and
- (c) ***Records of most types of monitoring inspections not maintained in information systems.*** CMS and EMS were used for submitting and reviewing daily inspection reports (see (b) above). However, apart from daily inspections, records of other monitoring inspections under the multi-tier monitoring mechanism (see para. 2.3) were in paper forms. Upon enquiry, FEHD informed Audit in March 2025 that it would consider developing an information technology system for monitoring inspections for both outsourced and in-house street cleansing services.

Audit also noted that some management information for monitoring street cleansing services was not readily available (see para. 4.11) and information systems were not used for compiling or maintaining such management information. In Audit's view, FEHD needs to explore the use of technologies in monitoring street cleansing services.

Note 60: *According to FEHD guidelines, key locations include major facilities, street sweeping beats, black spots with cleansing problems, locations with scheduled cleansing operations, etc.*

Note 61: *Following a major revamp in 2016, CMS is used for supporting FEHD's work on monitoring of service delivery under outsourced service contracts. Examples of CMS' functions include submitting/reviewing daily inspection reports, and reporting on/vetting the issuance of written warnings and default notices electronically.*

***Need to enhance EMS to capture key data
to facilitate monitoring of daily inspections***

4.20 Audit noted that while CMS maintained information (e.g. beat number) of the beats inspected, EMS did not have such data field. In this connection, senior officers had to review the address of service locations input manually and photographs taken at key locations inspected, and compare against the work programmes in order to ascertain the beat inspected. The process was resource intensive, time consuming and prone to errors (see para. 2.24(a)). To enhance efficiency and facilitate monitoring work, FEHD needs to consider enhancing EMS in this regard.

Audit recommendations

4.21 Audit has *recommended* that the Director of Food and Environmental Hygiene should:

- (a) **explore the wider use of technologies in delivering street cleansing services (including the deployment of mini-street washing vehicles to outsourced areas and in-house areas as appropriate);**
- (b) **explore the use of technologies in monitoring street cleansing services; and**
- (c) **consider enhancing EMS to capture key data (e.g. beat number) to enhance efficiency and to facilitate monitoring of daily inspections.**

Response from the Government

4.22 The Director of Food and Environmental Hygiene agrees with the audit recommendations. He has said that FEHD:

- (a) will continue to explore the wider use of technologies to improve service efficiency and monitoring; and
- (b) has enhanced EMS to include key data to facilitate the monitoring of daily inspections.

Issues related to non-skilled workers

4.23 According to FEHD, it attaches great importance to the treatment and occupational safety and health arrangements of its employees (regardless of FEHD's or contractors' employees). Examples of measures taken to enhance the benefits and working conditions of non-skilled workers, particularly those working outdoor, include optimising meal arrangements, providing drinking water and portable waist fans, and adopting sweat-wicking, breathable and reflective uniforms.

4.24 According to FEHD, public cleansing service contracts rely heavily on the deployment of non-skilled workers. With a view to tightening the control on its contractors (Note 62), the Central Investigation Team (Note 63) was set up under the Quality Assurance Section in September 2005. The major responsibilities of the Central Investigation Team are as follows:

- (a) investigation of employment-related complaints concerning non-skilled workers and their supervisors; and
- (b) monitoring the contractors' compliance with the Employment Ordinance (Cap. 57), the Minimum Wage Ordinance (Cap. 608), the Mandatory Provident Fund Schemes Ordinance (Cap. 485) and terms of service contracts with FEHD through conducting audit inspections and employment-related inspections.

Note 62: *According to FEHD, district/section staff are responsible for contract management and monitoring, such as monitoring the service performance of contractors' non-skilled workers and employment-related matters.*

Note 63: *According to FEHD guidelines, the Central Investigation Team under the Quality Assurance Section had an establishment of 7 staff. It is responsible for checking whether FEHD's service contractors for street cleansing services, waste collection services, pest control services, etc. that rely heavily on the deployment of non-skilled workers have fulfilled employment-related contractual obligations. In the period from January 2019 to December 2024, the strength was generally 6 to 7 (only 5 in the period from 31 January to 22 February 2024).*

***Need to conduct audit inspections
in accordance with stipulated frequency***

4.25 According to FEHD guidelines, contractual documents (e.g. employment contracts, monthly wages returns, daily attendance records) will be examined during the audit inspections. At least three audit inspections have to be carried out for every two-year contract, each to be carried out during the following contract period:

- (a) within three months from the commencement of contract;
- (b) every following year; and
- (c) within three months before expiry of contract.

The above audit inspection principle also covers street cleansing service contracts with contract periods exceeding two years.

4.26 There were a total of 61 street cleansing service contracts commenced and completed during the period from January 2019 to December 2024 for 19 DEHOs. Audit examined 56 street cleansing service contracts (Note 64) and found that in 1 (2%) of 56 street cleansing service contracts, only 2 audit inspections were conducted (against the stipulated frequency of at least three audit inspections) during the contract period. Audit considers that FEHD needs to take measures to ensure that audit inspections relating to non-skilled workers are conducted in accordance with the frequency stipulated in its guidelines.

Need to conduct more employment-related inspections

4.27 According to FEHD guidelines, employment-related inspections are conducted on a daily basis, subject to manpower deployment (see also Note 63 to para. 4.24). In every employment-related inspection, some non-skilled workers employed by the contractors will be interviewed on-site randomly. Each interviewee will be asked to complete a questionnaire to see whether he/she has any complaint

Note 64: *5 (out of 61) street cleansing service contracts with contract periods of 1 year were excluded in the analysis. 2 audit inspections were conducted for each of these 5 street cleansing service contracts.*

Other related issues

against the contractor. Audit examination of 61 street cleansing service contracts commenced and completed in the period from January 2019 to December 2024 for 19 DEHOs noted that only 41 employment-related inspections (Note 65) (involving 36 street cleansing service contracts) were conducted, i.e. at a frequency far lower than “on a daily basis” stated in FEHD guidelines.

4.28 Upon enquiry, FEHD informed Audit in March 2025 that as required under Financial Circular No. 3/2019 “Protection of Non-skilled Workers Engaged by Government Service Contractors”, apart from service contracts, the Central Investigation Team also conducted audit inspections to services procured by direct purchase authority since 2019. Besides, the Central Investigation Team also needed to conduct gratuity inspections to service contracts and direct purchase authority upon expiry of the services since then. Together with the increase in the total number of service contracts and the direct purchase authority from 201 in 2019 to 301 in 2024 (i.e. an increase of 50%), the total number of audit inspections and gratuity inspections required to be conducted had been increased from 235 in 2019 to 378 in 2024 (i.e. an increase of 61 %). The staff of the Central Investigation Team had gone all out. Nevertheless, the Central Investigation Team would endeavour to conduct more employment-related inspections as far as practicable. In Audit’s view, conducting employment-related inspection is one of the tools for FEHD to obtain timely feedback from contractor’s employees, there is merit for FEHD to conduct more employment-related inspections as far as practicable.

Audit recommendations

4.29 **Audit has *recommended* that the Director of Food and Environmental Hygiene should:**

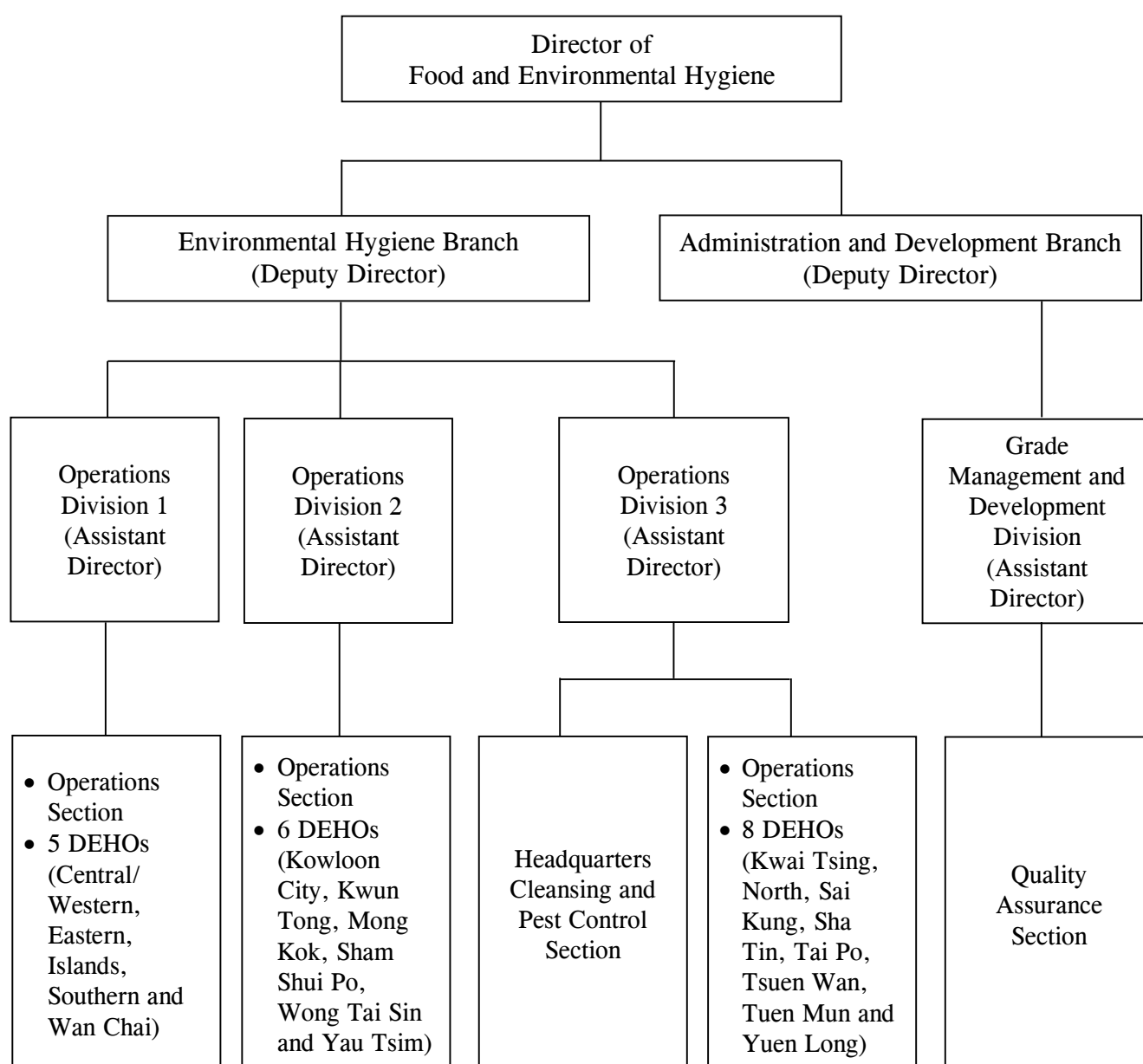
- (a) **take measures to ensure that audit inspections relating to non-skilled workers are conducted in accordance with the frequency stipulated in FEHD guidelines; and**
- (b) **conduct more employment-related inspections as far as practicable with a view to obtaining timely feedback from contractors’ employees.**

Note 65: *The numbers of employment-related inspections conducted were 6 in 2019, 14 in 2020, 9 in 2021, 2 in 2022, 6 in 2023 and 4 in 2024 (up to September).*

Response from the Government

4.30 The Director of Food and Environmental Hygiene agrees with the audit recommendations.

**Food and Environmental Hygiene Department:
Organisation chart (extract)
(30 September 2024)**



Source: FEHD records

Remarks: Only the branches/divisions/offices/sections related to the street cleansing services are shown.

Appendix B
(paras. 2.3, 2.11
and Note 42 to
para. 2.24 refer)

**Frequencies, timeframes and coverage of monitoring inspections
stipulated in Food and Environmental Hygiene Department's guidelines
(30 September 2024)**

Item	Type	Staff	Inspection frequency	Inspection timeframe/coverage
1	Daily inspection	<i>For outsourced areas:</i>		
		Senior Foreman	(a) <i>Street sweeping and poster removal services</i> : at least 10 % of the cleansing area under his/her charge each working day and whole cleansing sector under his/her charge once every 10 working days (b) <i>Street washing services</i> : at least 1 scheduled service location under his/her charge on the day service is provided (c) <i>Gully cleansing services</i> : at least 10% of scheduled service locations under his/her charge on the day service is provided	
<i>For in-house areas:</i>				
Foreman		(a) <i>Street sweeping services</i> : alternate days to every shift/beat (b) <i>Street washing and poster removal services</i> : once per shift (c) <i>Gully cleansing services</i> : weekly		
2		Overseer	Overseers to decide on the inspection requirements of the services under their purview (see para. 2.25(a) and (b))	
3	Formal inspection	Overseer	Monthly	All cleansing sectors annually. Targets strategically selected by district management on specific area(s) concerns of cleansing services for inspection
		Senior Health Inspector and Health Inspector	At least once quarterly	
4	Assigned risk-based surprise inspection	Overseer and Senior Foreman (Special Duties)	Not fewer than once per week	Specific targets strategically selected by district management on specific area(s) concerns of cleansing services for inspection
5	Supervisory check	Health Inspector	Weekly	1 cleansing sector at a time and all cleansing sectors under his/her charge within 6 weeks
		Senior Health Inspector	Fortnightly	2 cleansing sectors at a time and all cleansing sectors within 3 months
6	Systematic inspection	Chief Health Inspector and District Environmental Hygiene Superintendent	Frequent (as far as time permits) (see para. 2.3(e))	N.A.

Source: FEHD records

Appendix C
(para. 2.18 refers)

**10 latest completed street cleansing service contracts
with largest number of default notices issued
(September 2024)**

Contract	Contractor	No. of default notices issued				Total amount of deductions (e) (\$)
		Performance -related (a)	Behaviour -related (b)	Blatant (c)	Total (d) = (a) + (b) + (c)	
A	A	51	110	18	179	338,279
B	A	21	76	6	103	161,879
C	B	1	83	7	91	129,344
D	A	13	44	18	75	170,747
E	C	2	49	3	54	73,746
F	D	14	25	11	50	118,067
G	B	2	41	5	48	76,413
H	D	1	40	6	47	77,848
I	C	6	38	2	46	67,432
J	D	0	43	2	45	56,525

Source: Audit analysis of FEHD records

Acronyms and abbreviations

Audit	Audit Commission
CMIS	Complaint Management Information System
CMS	Contract Management System
COR	Controlling Officer's Report
DEHO	District Environmental Hygiene Office
DET	Dedicated Enforcement Team
EHSIS	Environmental Hygiene Statistical Information System
EMS	E-Management System for In-house Cleansing Services and Pest Control Services
EPD	Environmental Protection Department
FEHD	Food and Environmental Hygiene Department
FPCS	Fixed Penalty Computer System
FPN	Fixed Penalty Notice
IP	Internet Protocol