

CHAPTER 6

**Security Bureau
Development Bureau
Fire Services Department
Buildings Department**

**Upgrading the fire safety
in industrial buildings**

**Audit Commission
Hong Kong
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This audit review was carried out under a set of guidelines tabled in the Provisional Legislative Council by the Chairman of the Public Accounts Committee on 11 February 1998. The guidelines were agreed between the Public Accounts Committee and the Director of Audit and accepted by the Government of the Hong Kong Special Administrative Region.

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UPGRADING THE FIRE SAFETY IN INDUSTRIAL BUILDINGS

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UPGRADING THE FIRE SAFETY IN INDUSTRIAL BUILDINGS

Executive Summary

1. The planning, design and construction of a building is required to comply with the Buildings Ordinance (Cap. 123) and its subsidiary legislation, as well as the codes of practice in force at the time of the submission of the relevant building plans. For old buildings, their fire safety standards generally fall short of the standards prescribed in the prevailing codes of practice published by the Fire Services Department (FSD) and the Buildings Department (BD). In June 2020, the Fire Safety (Industrial Buildings) Ordinance (FS(IB)O — Cap. 636) came into operation, aiming at improving the fire safety provisions of industrial buildings constructed on or before 1 March 1987, or those constructed with their building plans first submitted to the Building Authority for approval on or before the same date (hereinafter referred to as target industrial buildings (TIBs)). FS(IB)O empowers FSD and BD to inspect TIBs and issue fire safety directions (FSDns) to require the owners and/or occupiers to upgrade the fire safety on the provision or improvement of fire service installations or equipment (FSI) and fire safety construction. FS(IB)O is implemented in two phases. Phase 1 includes TIBs which were constructed or with building plans first submitted for approval in or before March 1973 and Phase 2 includes TIBs which were constructed or with building plans first submitted for approval on or before 1 March 1987 (i.e. between 1 April 1973 and 1 March 1987). As at 30 June 2025, there were 1,212 TIBs, comprising 437 and 775 TIBs in Phases 1 and 2 respectively.

2. To address the fire safety concern of mini-storage premises (MSPs), relevant government departments, including FSD and BD, conducted a territory-wide inspection programme of MSPs during the period from 28 June 2016 to 11 June 2017. Thereafter, FSD and BD conduct inspections on newly-identified MSPs containing cluster(s) of lockers/storage cubicles allowing direct access for the public to store and retrieve articles (i.e. target MSPs). Against the irregularities in target MSPs in respect of fire safety perspective, FSD and BD have been taking enforcement actions under the Fire Services (Fire Hazard Abatement) Regulation (Cap. 95F) and the Buildings Ordinance respectively. The Audit Commission (Audit) has recently conducted a review to examine the work of FSD and BD in upgrading fire safety in industrial buildings.

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Inspection and issuance of fire safety directions

3. ***Room for improvement in drawing up implementation schedule for inspection of TIBs.*** With reference to the annual inspection target of 60 TIBs, FSD and BD set out the implementation schedule, prioritising TIBs under Phase 1 that are not sprinkler-protected, in the order of other fire risk factors assessed by FSD, and then by building age. While the availability of automatic sprinkler system was the major factor in determining the priority of inspection for TIBs under Phase 1, 82 (24%) of the 345 TIBs without any automatic sprinkler system or with partial sprinkler system only had not been inspected by FSD and BD as at 30 June 2025 (paras. 2.4, 2.6 and 2.7). Audit reviewed the implementation schedule of these 82 TIBs and found areas for improvement, as follows:

- (a) ***Need to make continued efforts in exploring a feasible and practicable approach for complying with FS(IB)O by owners of TIBs without lifts.*** According to BD, in late 2023, it was revealed that TIBs without lifts in the approved building plans might encounter genuine site constraints in providing a fireman's lift. Accordingly, the 37 TIBs without any lifts in the approved plans that were not sprinkler-protected or with partial sprinkler system only had been rescheduled for inspection to a later stage of Phase 1. FSD and BD were conducting a detailed analysis to categorise them into different batches on a risk basis, in order to formulate an implementation plan and establish alternative requirements, taking into account the building design features and other similarities (paras. 2.8 and 2.9); and
- (b) ***Need to regularly review the implementation schedule for inspection of TIBs under Phase 1.*** According to BD's Fire Safety Section Manual (FSSM), a lower priority would be accorded to TIBs having undergone major repair works not more than four years from the date of scheduled inspection so as to avoid undue disturbance to the owners. In this connection, 26 TIBs that are not sprinkler-protected or with partial sprinkler system only have been deferred for inspection to the end of Phase 1. Since the major repair works might not aim for enhancing the fire safety of the buildings and the works of some of these 26 TIBs have been completed more than four years ago, BD needs to, in collaboration with FSD, regularly review the implementation schedule for inspection of TIBs under Phase 1, taking into account the prevailing fire risk of TIBs (para. 2.10).

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4. *Need to review existing procedures and explore alternative measures for issuing FSDns regarding mechanical ventilating system in locked units which FSD cannot inspect.* Audit noted that for locked units which FSD could not inspect, the requirement of the provision or improvement of emergency lighting within the area occupied by the occupier was included in the FSDns issued to the owners. However, FSD would not issue FSDns relating to the requirement of automatic cut-off device for mechanical ventilating system in the occupied area to the owners/occupiers if inspection could not be conducted. Audit considers that FSD needs to review its existing procedures and explore alternative measures for issuing FSDns regarding the provision of an automatic cut-off device for mechanical ventilating system in locked units which FSD cannot inspect (paras. 2.19 and 20).

5. *Timeliness of issuance of FSDns.* FSD and BD issue their own FSDns on an agreed date (as far as possible) and the date of issuance should be, in principle, within four months after the initial inspection. As at 30 June 2025, 17,727 and 6,566 FSDns were issued by FSD and BD respectively to the owners/occupiers of 252 TIBs. Audit analysed the 273 TIBs inspected as at 30 June 2025 and noted that FSD and BD issued FSDns to owners and occupiers of 73 (27%) TIBs more than four months after the inspection and FSDns had not been issued to owners/occupiers of 1 (1%) TIB more than four months after the inspection. Since the timely issuance of FSDns is vital as it triggers the entire process for improving the fire safety of TIBs, FSD and BD need to make continued efforts in enhancing the timeliness of issuance of FSDns (para. 2.23).

6. *Need to consider conducting ownership check earlier for TIBs involving a large quantity of units.* For each TIB, BD sends the memorandum to the Land Registry, requesting for ownership information within four weeks. However, for the 16 TIBs in which FSD and BD took more than 6 months to issue FSDns after initial inspections, BD received the reply from the Land Registry after more than four weeks, ranging from 6 to 28 weeks (para. 2.24(c)).

Follow-up actions on fire safety directions issued by the Fire Services Department

7. *Need to keep in view the progress of provision or improvement of FSI.* As at 30 June 2025, the compliance rates of FSDns and fire safety compliance orders (FSCOs) for fire safety requirements involving common parts and inside individual

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units were 0% and 86% respectively. Although FS(IB)O has been in force for more than five years since its implementation on 19 June 2020, the fire safety improvement works involving common parts have yet to commence for most of the TIBs. While noting that improvement works involving common parts are more complex due to building constraints and the need of reaching consensus among owners, and that FSD has rendered assistance to relevant parties on various fronts, Audit considers that FSD needs to keep in view the progress of provision or improvement of FSI by owners and make continued efforts in offering necessary assistance to owners where appropriate (paras. 3.4 and 3.6).

8. ***Room for improvement in performing periodic progress checks.*** Audit sample examination of FSD's periodic progress checks performed upon expiry for FSDns relating to the common parts of 12 TIBs revealed that:

- (a) ***Timeframe not stipulated in the Fire Protection Commands Procedural Instructions (CPI(FP)) to perform periodic progress checks.*** While there was no timeframe stipulated in CPI(FP) to perform periodic progress checks, FSD performed the checks 1 day to 57 days (averaging 19 days) before expiry of the relevant FSDns for 6 (50%) TIBs and 11 to 89 days (averaging 33 days) after expiry of the relevant FSDns for the other 6 (50%) TIBs;
- (b) ***Inspections not reported in a timely manner.*** According to CPI(FP), the responsible inspection officers should report the findings of the checks as far as possible within 10 working days after the periodic progress checks. However, inspection officers took 14 to 73 working days (averaging 36 working days) to report the findings for 7 (58%) of the 12 TIBs; and
- (c) ***Timeframe not stipulated in CPI(FP) to issue post-warning letters.*** After the periodic progress checks of the 12 TIBs, no significant progress was noted by FSD in 3 TIBs and thus, post-warning letters were issued to the owners (involving 124 FSDns). While there was no timeframe stipulated in CPI(FP) to issue post-warning letters, FSD took 50 to 63 days (averaging 58 days) after expiry of the relevant FSDns to issue the post-warning letters (paras. 3.12(b) and 3.13).

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9. ***Room for improvement in issuing certificates of compliance.*** According to CPI(FP), an inspection officer will arrange an acceptance inspection to be carried out within 15 working days after receiving a notification from an owner/occupier upon completion of the fire safety improvement works. During the period from 1 July to 31 December 2024, FSD carried out acceptance inspections and concluded that the results were satisfactory for 882 FSDNs. Audit examination of these 882 FSDNs revealed that:

- (a) ***Acceptance inspections not carried out in a timely manner.*** For 61 (7% of 882) FSDNs, FSD carried out acceptance inspections more than 15 working days after receiving relevant notifications, ranging from 17 to 95 working days; and
- (b) ***Certificates of compliance not issued in a timely manner.*** While timeframe was not set in CPI(FP) for the issuance of certificate of compliance, the certificates of compliance were issued more than 90 days after the relevant acceptance inspections for 291 (33% of 882) FSDNs, ranging from 91 to 274 days (paras. 3.17 and 3.18).

10. ***Need to consider stipulating timeframe for processing extension of time (EoT) applications.*** If the relevant owners or occupiers cannot complete the fire safety improvement works within the time limit specified on FSDNs issued by FSD, they may apply in writing, with supporting documents for the work progress, to FSD for EoT. In 2024, FSD received 156 applications for EoT, of which 145 (93%) were approved, and 11 (7%) were rejected due to no significant progress of the improvement works. Audit sample check of 25 approved applications revealed that FSD took 1 to 122 days (averaging 42 days) to approve and send out the EoT approval letters (paras. 3.23 and 3.24).

11. ***Need to review administrative procedures in registering FSCOs against the land register.*** Pursuant to FS(IB)O, an enforcement authority may cause an FSCO to be registered by memorial in the Land Registry against the land register of the respective buildings or part of a building, and if an enforcement authority is required to cause an FSCO to be registered, it must, as soon as practicable within one month beginning on the date of the FSCO, cause it to be registered. Audit analysis of FSD records on the registration of the 72 FSCOs (in force as at 30 June 2025) revealed that FSD took 50 to 193 days (averaging 96 days) to register the FSCOs against the land register (paras. 3.33 and 3.34).

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12. *Need to update the information of FSDns and FSCOs in the designated website on a timely basis.* In order to enable the public to obtain the relevant information and enhance their awareness of the outstanding legal liabilities (if any) of the TIBs, the information (including the serial number, address of the building or part, date and compliance status) of FSDns and FSCOs will be published in a designated website in accordance with FS(IB)O. Audit visited the designated website on 5 September 2025 and noted that:

- (a) among the 420 FSDns (involving 25 TIBs) issued in July and August 2025, the information of 144 (34%) FSDns (involving 3 TIBs) had not been published in the website; and
- (b) among the 72 FSCOs with expiry dates after 30 June 2025, the information of 1 (1%) FSCO had not been published in the website, and that of the other 71 (99%) FSCOs were wrongly shown as FSDns which had different legal liabilities (paras. 3.37 and 3.38).

Follow-up actions on fire safety directions issued by the Buildings Department

13. *Room for improvement in arranging compliance inspections.* According to FSSM, when owners notify BD of works completion or submit certificates/test reports to BD, relevant case officers should arrange compliance inspections within 28 days and submit the inspection reports for endorsement by the Senior Building Surveyor not later than two months after the compliance inspections. Audit analysis of the Building Condition Information System (BCIS) records from 2021 to 2025 (up to June 2025) revealed that:

- (a) information on the dates of notification of works completion by owners were not captured in BCIS. As a result, Audit was unable to ascertain whether the 28-day time limit of arranging compliance inspection was complied with; and
- (b) as regards the 2-month time limit of submitting inspection reports for endorsement by the Senior Building Surveyor, for the 879 compliant FSDns as at 30 June 2025, compliance letters were issued two months after the compliance inspections for 263 (30%) FSDns, with delays ranging from

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1 day to 451 days, averaging 70 days, and the relevant information was not captured in BCIS for 374 (43%) FSDns (para. 4.5).

14. ***Need to enhance collection of management statistics.*** While according to FSSM, milestones have to be input and monitored through appropriate statistical means with a view to ensuring timely actions and preventing backlogging of outstanding actions, information on notification date for completion and positive response from owners were not required to be entered into BCIS for FSDns issued for TIBs. Audit considers that BD needs to enhance the collection of management statistics and generation of management reports in BCIS for better monitoring of the progress of outstanding FSDns and follow-up actions taken by BD staff (para. 4.18).

15. ***Room for improvement in monitoring advisory letters issued.*** For unauthorised building works which are subject to statutory orders under section 24 of the Buildings Ordinance and affecting fire safety, advisory letters reminding the owners to carry out the required fire safety improvement when dealing with the section 24 orders will be issued. As at 30 June 2025, there were 79 non-compliant advisory letters, of which relating section 24 orders were discharged in relation to 33 (42% of 79) advisory letters. However, new FSDns were yet to be issued to the owners for the outstanding improvement works in the non-compliant advisory letters as at 30 June 2025 (paras. 4.19, 4.20 and 4.22).

16. ***Need to keep in view the development of the auto-generation of warning letters for non-compliant FSDns.*** According to FSSM, upon expiry of the compliance period and not later than three months from the expiry of FSDns or any extended time limit, warning letters should be issued for cases without positive response or submission of the required certificates/test reports from the owners. However, Audit noted that:

- (a) from 2021 to 2025 (up to June 2025), of the warning letters issued in relation to 3,807 FSDns, the issuance of the warning letters in relation to 2,529 (66%) FSDns did not meet the 3-month target. The delays ranged from 1 day to 1,239 days, averaging 137 days; and

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- (b) as at 30 June 2025, no warning letters had been issued to the owners in relation to 150 FSDns of which initial/extended compliance period had been expired for three months or more and were considered as without positive response.

According to BD, the auto-generation of warning letters for non-compliant FSDns function in BCIS was under development and would be implemented tentatively by December 2025 (paras. 4.26 and 4.27).

17. *Need to regularly update the status of remaining outstanding FSDns for timely referrals for taking prosecution actions.* According to FSSM, to ensure fairness and reduce duplication of efforts when referring cases for prosecution, case officers should also consider the practicality and possibility of dealing with default cases in the same building in one go. Audit sample check of 1 (involving 36 FSDns) of the 3 TIBs with prosecution actions taken revealed that 2 FSDns were already complied with, and 9 FSDns were referred to the Fast Track Prosecution Team (FPT) for taking prosecution actions in October 2023. As of June 2025, 22 of the remaining 25 FSDns considered as without positive response had not been referred for taking prosecution actions (paras. 4.28 and 4.30).

18. *Need to make continued efforts in referring non-compliant FSDns for taking prosecution actions.* In accordance with FS(IB)O, a prosecution for an offence may only be started before the end of 12 months beginning on the date of which the offence is discovered by, or comes to the notice of, the enforcement authority. Audit noted that for the 56 FSDns referred to FPT on or before March 2025 for taking prosecution actions, for 13 FSDns pending for taking prosecution actions, the time elapsed from the dates of compliance inspections where non-compliance was identified was over 12 months (ranging from 16 to 21 months as of June 2025). After case officers reconfirmed the non-compliance status of all the 13 cases, prosecution works had been re-activated in June 2025 (paras. 4.28 and 4.32).

Other related issues

19. *Need to make continued efforts in taking follow-up actions on outstanding fire hazard abatement notices (FHANs) and fire hazard orders (FHOs) issued to the operators of MSPs by FSD.* As at 30 June 2025, there were 129 target MSPs with outstanding FHANs or FHOs. Of which:

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- (a) FSD had not instigated any prosecution action against the operators of 34 target MSPs and prosecution was in progress against the operators of 3 target MSPs. Audit examination of the 19 target MSPs subject to initial inspections carried out during 2016 to 2021 revealed that:
 - (i) 9 target MSPs were operated by the same company. However, FSD could not instigate prosecution action since the FHANs were not successfully served to the responsible person and the premises were locked when conducting follow-up inspections;
 - (ii) for 1 target MSP with fire hazard identified in 2020, FSD approved an EoT application submitted by the operator and the expiry date of the latest FHAN issued was December 2023; and
 - (iii) for 1 target MSP with fire hazard identified in 2020, FSD conducted follow-up inspection in June 2022 and concluded that the FHAN was complied with. In order to issue the compliance letter, the operator should provide the valid certificates of FSI. However, up to 30 June 2025, the submission of certificates of FSI was still pending; and
 - (b) operators of 92 target MSPs were prosecuted with FHOs issued. Of the 92 target MSPs, 80 (87%) were initially inspected with fire hazard found in 2016 and 2017 (paras. 5.5, 5.6 and 5.8).
20. ***Need to make continued efforts in taking follow-up actions on outstanding statutory orders issued to owners of premises operating MSPs by BD.*** As at 30 June 2025, statutory orders issued to owners of 275 premises operating target MSPs had not been complied with. For 199 (72% of 275) premises, the compliance period of statutory orders issued to the owners were expired but not yet referred to the Legal Services Section for prosecution. In particular, for 104 (52%) of 199 premises, statutory orders were issued to the owners in 2016 and 2017. In addition, although warning letters were issued to owners of 164 (82% of 199) premises operating target MSPs, BD had only conducted inspection in 42 (21% of 199) premises during the period from January 2023 to June 2025 (paras. 5.12, 5.13 and 5.15).

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21. ***Financial assistance provided to owners.*** The Building Safety Loan Scheme (BSLS) was launched by BD to offer loans to individual owners of private buildings for carrying out maintenance and repair works to improve the safety of their buildings (para. 5.22). Audit examination found the following room for improvement:

- (a) ***Need to consider setting time limit for issuing reminders.*** According to BD's procedure manual for BSLS, all applications should normally be approved in 9 months from the date of receipt of the application. Audit analysis of the 29 premises with applications approved (involving 24 applications) from April 2020 to June 2025 (for carrying out improvement works in industrial buildings which include fire safety improvement works) found that 8 applications relating to 13 (45%) premises were approved over 9 months from the dates of receipt of the applications, with time taken ranging from 292 to 610 days and averaging 422 days. While no time limit for issuing reminders was stipulated in the procedure manual, the actual time between sending letters requesting for supporting documents and sending reminders varied. For instance, the average time for issuing the first reminders to owners' corporations was 116 days, ranging from 49 to 332 days (paras. 5.23 to 5.25); and

- (b) ***Need to step up the promotion of BSLS to owners of TIBs with FSDns issued.*** According to BD's procedure manual, promotional notice will be issued to owners' corporations for encouraging loan applications as appropriate. Audit scrutiny of the case files found that such promotional notices were usually issued to the owners' corporations in the letters requesting for supporting documents relating to the first application received for a particular building. Audit noted that applications relating to 5 of the 12 premises located at Phase 1 TIBs (where joint inspections had been conducted by FSD and BD with FSDns issued) were submitted after the issuance of FSDns, of which 3 applications were relating to works in individual units and their applications were submitted 468 days on average after FSDns were issued, ranging from 417 to 570 days (para. 5.28).

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Audit recommendations

22. **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:**

- (a) **the Director of Fire Services and the Director of Buildings should make continued efforts in enhancing the timeliness of issuance of FSDns (para. 2.25);**

- (b) **the Director of Fire Services should:**
 - (i) **review FSD's existing procedures and explore alternative measures for issuing FSDns regarding the provision of an automatic cut-off device for mechanical ventilating system in locked units which FSD cannot inspect (para. 2.26);**

 - (ii) **keep in view the progress of provision or improvement of FSI by owners and make continued efforts in offering necessary assistance to owners where appropriate (para. 3.10(a));**

 - (iii) **maintain the timeliness of reporting the findings of periodic progress checks in accordance with CPI(FP) (para. 3.26(b));**

 - (iv) **stipulate the timeframes of performing periodic progress checks and issuing post-warning letters in CPI(FP) (para. 3.26(c));**

 - (v) **carry out acceptance inspections in accordance with the timeframe stipulated in CPI(FP) as far as practicable and maintain proper records on the acceptance inspections conducted (para. 3.26(d));**

 - (vi) **stipulate the 2-month timeframe in CPI(FP) for the issuance of certificates of compliance (para. 3.26(e));**

 - (vii) **consider stipulating timeframe for processing and sending out EoT approval/rejection letters in CPI(FP) (para. 3.26(g));**

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- (viii) **review FSD’s administrative procedures with a view to registering FSCOs against the land register of the respective buildings or part of a building in accordance with FS(IB)O in a timely manner (para. 3.35(c));**
 - (ix) **take measures to update the information of FSDns and FSCOs in the designated website on a timely basis (para. 3.39);**
 - (x) **make continued efforts in taking follow-up actions on outstanding FHANs and consider stepping up measures in handling prolonged non-compliant cases (e.g. applying for warrant for entry into target MSPs) (para. 5.18(a));**
 - (xi) **take measures to ensure that the FHAN is served to a legally authorised individual of the company operating the target MSP (para. 5.18(b)); and**
 - (xii) **make continued efforts in taking follow-up actions on outstanding FHOs (para. 5.18(c)); and**
- (c) **the Director of Buildings should:**
- (i) **make continued efforts in exploring a feasible and practicable approach for complying with FS(IB)O by owners of TIBs without lifts (para. 2.13(a));**
 - (ii) **in collaboration with FSD, regularly review the implementation schedule for inspection of TIBs under Phase 1, taking into account the prevailing fire risk of TIBs (para. 2.13(b));**
 - (iii) **consider conducting ownership check earlier for TIBs involving a large quantity of units with a view to ensuring the timeliness of issuance of FSDns (para. 2.27(b));**
 - (iv) **remind case officers to enter the required case data in BCIS for monitoring the compliance with the stipulated time limits in arranging compliance inspections and submitting inspection**

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- reports to the Senior Building Surveyor for endorsement (para. 4.23(a));
- (v) remind case officers to expedite the submission of inspection reports for endorsement by the Senior Building Surveyor so as to comply with the 2-month time limit as far as practicable (para. 4.23(b));
 - (vi) keep in view the development of the new platform and make use of it to improve the case management (para. 4.23(c));
 - (vii) enhance the collection of management statistics and generation of management reports in BCIS for better monitoring of the progress of outstanding FSDns and follow-up actions taken by BD staff (para. 4.23(g));
 - (viii) expedite the incorporation of the procedures of follow-up actions on advisory letters in FSSM including the timely issuance of FSDns for the outstanding improvement works in the non-compliant advisory letters (para. 4.23(h));
 - (ix) keep in view the development of the auto-generation of warning letters for non-compliant FSDns function in BCIS (para. 4.33(a));
 - (x) regularly update the status of the remaining outstanding FSDns in the same TIBs for timely referrals of non-compliant FSDns for taking prosecution actions (para. 4.33(b));
 - (xi) make continued efforts in referring the non-compliant FSDns to FPT for taking prosecution actions (para. 4.33(d));
 - (xii) make continued efforts in issuing warning letters and arranging compliance inspections with owners with long outstanding statutory orders (para. 5.19(a));

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- (xiii) **consider setting time limit for issuing reminders when processing BSLs applications in the procedural manual (para. 5.30(a)); and**
- (xiv) **issue promotional notice of BSLs together with FSDns to owners of TIBs (para. 5.30(b)).**

Response from the Government

23. The Secretary for Security and the Director of Fire Services generally agree with the audit recommendations. They have expressed appreciation on Audit's efforts in conducting this study and making recommendations on the work relating to upgrading the fire safety in industrial buildings.

24. The Secretary for Development and the Director of Buildings generally agree with the audit recommendations and would like to thank Audit for the review and the recommendations on the work relating to upgrading the fire safety in industrial buildings.

PART 1: INTRODUCTION

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

Background

1.2 Pursuant to the Buildings Ordinance (Cap. 123), the planning, design and construction of a building is required to comply with the Ordinance and its subsidiary legislation. As far as fire safety standards are concerned, the requirements are stipulated in the codes of practice in force at the time of the submission of the relevant building plans, including the requirements on fire safety construction as stipulated in the Code of Practice for Fire Safety in Buildings published by the Buildings Department (BD) and the requirements on the provision of fire service installations or equipment (FSI) according to the Code of Practice for Minimum Fire Service Installations and Equipment (FSI code) published by the Fire Services Department (FSD).

1.3 For old buildings, their fire safety standards generally fall short of the standards prescribed in the prevailing codes of practice published by FSD and BD. For instance, an automatic sprinkler system promulgated in the FSI code is a highly effective FSI capable of limiting or extinguishing a fire prior to the arrival of firefighters. However, only some industrial buildings constructed before 1973 were installed with such systems. Industrial buildings and godowns built after March 1973 were required to be equipped with automatic sprinkler systems only if they were more than two-storey high. In March 1987, FSD revised the FSI code, extending the requirement of automatic sprinkler systems to all industrial buildings irrespective of height. FSI code was further revised in recent years to incorporate modern standards (Note 1). According to FSD, it recorded 426 fire incidents in industrial buildings from 2021 to 2024, of which 229 fire incidents resulting in 23 casualties occurred in industrial buildings with building plans first submitted to the Building Authority before March 1987.

Note 1: *As of 30 June 2025, the latest two versions of FSI code were revised in September 2022 and April 2012.*

Introduction

1.4 In the 1990s and 2000s, the Fire Safety (Commercial Premises) Ordinance (Cap. 502) and the Fire Safety (Buildings) Ordinance (Cap. 572) were enacted respectively with an aim to bring the fire safety standards of old commercial, composite and domestic buildings up to the modern standards. Industrial buildings were the only remaining major category of pre-1987 buildings to be dealt with. The fires at certain old industrial buildings (e.g. the No. 4 alarm fire at the Amoycan Industrial Centre in Ngau Tau Kok in June 2016 where two firefighters died on duty) have heightened public concern over their fire risks. It was imperative to legislate for their fire safety enhancement.

1.5 In June 2020, the Fire Safety (Industrial Buildings) Ordinance (FS(IB)O — Cap. 636) came into operation to require owners and/or occupiers to improve the fire safety provisions of industrial buildings which were wholly or partly constructed for use as a factory, industrial undertaking, godown, warehouse, place of bulk storage or similar industrial premises on or before 1 March 1987, or those constructed for the aforesaid uses with their building plans first submitted to the Building Authority for approval on or before the same date (hereinafter referred to as target industrial buildings (TIBs)).


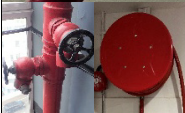





Upgrading fire safety of industrial buildings under FS(IB)O

1.6 Under FS(IB)O, the Director of Fire Services and the Director of Buildings are designated as the enforcement authorities. The Ordinance empowers them (and officers acting under their authority) to inspect TIBs and issue fire safety directions (FSDns) to require the owners and/or occupiers to upgrade the fire safety on two fronts:

- (a) **FSI.** FSI required to be provided or improved may include automatic sprinkler system, fire hydrant and hose reel system, manual fire alarm system, emergency lighting, exit signs (including directional signs), secondary source of electrical power supply and automatic cut-off device for mechanical ventilating system. The detailed specifications and requirements are set out in the FSI code (April 2012 version) published by FSD. FSDns on improving FSI are issued to owners and/or occupiers (see Figure 1); and

Figure 1

FSI requirements as stipulated in FS(IB)O

	FSI	FSDn issued to	
		Owner	Occupier
	Automatic sprinkler system	✓	
	Fire hydrant and hose reel system	✓	
	Manual fire alarm system	✓	
	Emergency lighting	✓	✓
	Exit signs (including directional signs)	✓	
	Secondary source of electrical power supply	✓	
	Automatic cut-off device for mechanical ventilating system	✓	✓

Source: FSD records

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- (b) **Fire safety construction.** Fire safety construction includes means of escape, means of access for firefighting and rescue (e.g. provision of fireman's lifts), and fire resisting construction (Note 2 — see Photographs 1(a) and (b) for some examples). The detailed specifications and requirements are set out in the Code of Practice for Fire Safety in Buildings 2011 (October 2015 version) published by BD. FSDns on improving fire safety construction are issued to owners.

Photographs 1(a) and (b)

Examples of fire resisting construction

(a) Fire door



(b) Cable and duct protection



Source: BD records

Note 2: *Fire resisting construction requirements are:*

- (a) *protecting exit routes and staircases with separating walls of fire resisting construction;*
- (b) *providing fire doors;*
- (c) *improving the fire resistance of external walls, and protecting openings in the external walls to inhibit the spread of fire to adjoining buildings;*
- (d) *providing fire resisting separation between different parts of the building; and*
- (e) *providing smoke vents to basements.*

1.7 After receiving FSDns, owners should take the initiative to complete the required works to comply with FSDns within the specified time limit (Note 3). The fire safety improvement works normally involve the following processes:

- (a) ***Arranging for carrying out of fire safety improvement works.*** An owner may need to discuss the works with other owners and/or owners' corporation through convening an owners' meeting for providing/improving FSI and fire safety construction (see para. 1.6);
- (b) ***Appointing registered building professionals.*** An owner may need to browse the lists of Authorised Persons (an architect, engineer or surveyor registered as an Authorised Person under the Buildings Ordinance)/Registered Structural Engineers (Note 4), and appoint registered building professionals through tenders. An owner may need to ascertain the scope of service to be provided by them;
- (c) ***Appointing registered fire service installation contractors (RFSICs — Note 5) and registered contractors.*** An owner may need to browse the list of RFSICs and the lists of registered contractors on FSD's and BD's websites (see Note 4 in (b)), and appoint RFSICs and registered contractors through tenders. Fire safety improvement proposals/layouts plans are required to be submitted to relevant departments for approval, if necessary; and
- (d) ***Carrying out fire safety improvement works.*** Prior to commencement of works, the owners or their representatives may need to confirm the fire safety improvement works and submit alternative proposal (if applicable)

Note 3: *For an occupier who receives an FSDn directing to provide emergency lighting and/or automatic cut-off device for mechanical ventilating system, he needs to appoint a registered fire service installation contractor for the improvement works. Upon completion, he needs to notify FSD for arrangement of inspection.*

Note 4: *According to BD, the lists of Registered General Building Contractors, Registered Minor Works Contractors and Authorised Persons interested in providing services in the fire safety improvement works are available at BD's Headquarters and its website.*

Note 5: *The Fire Service (Installations and Equipment) Regulations (Cap. 95B) specify that FSI shall be installed, maintained, inspected or repaired only by contractors registered with FSD under the Fire Service (Installation Contractors) Regulations (Cap. 95A).*

Introduction

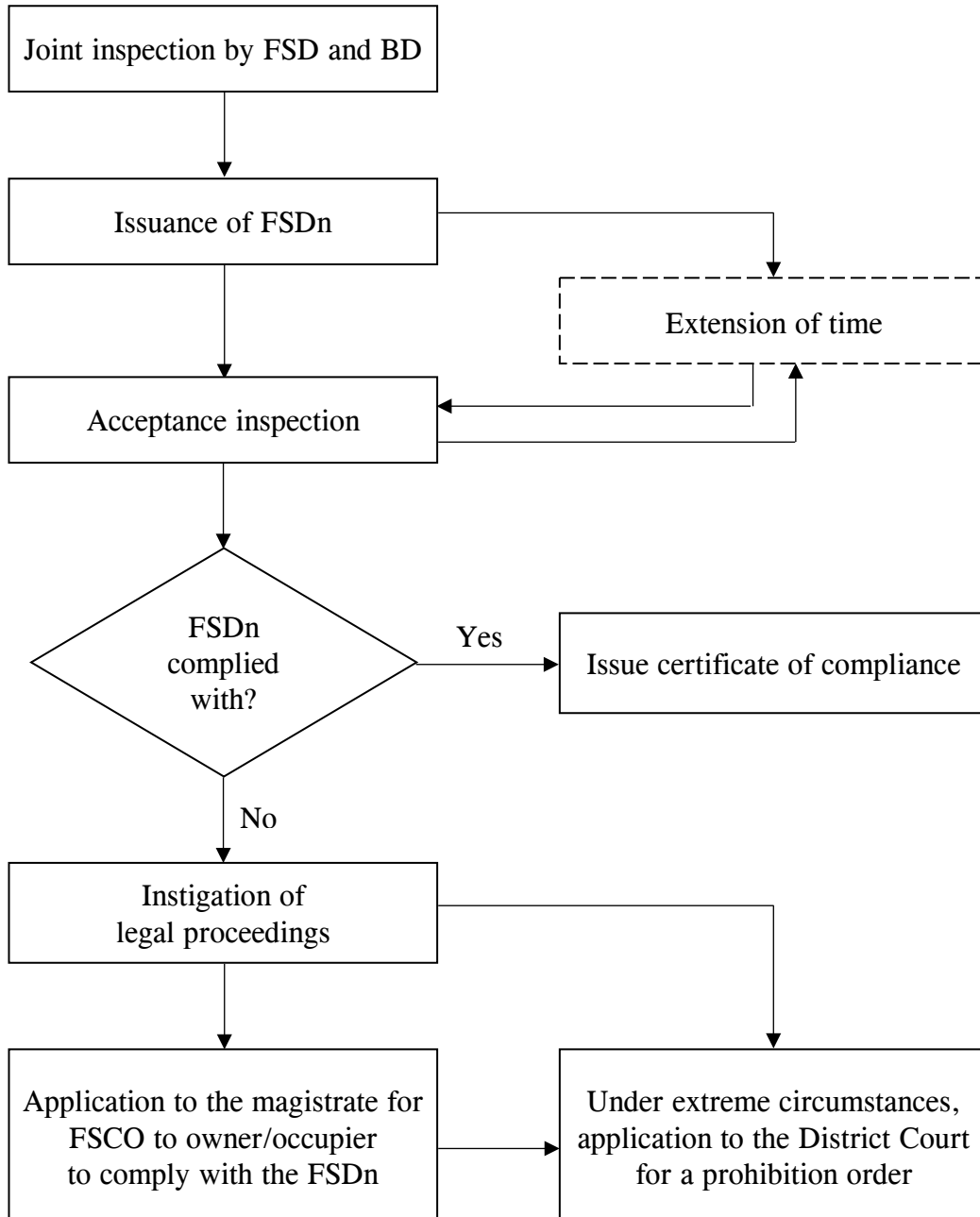
for approval by FSD/BD or relevant departments. Upon completion of improvement works, the owners or their representatives need to notify FSD/BD for arrangement of inspection and submit copies of certificates/test reports where applicable.

Enforcement and implementation of FS(IB)O

1.8 Figure 2 shows the procedures of enforcement actions under FS(IB)O. The owners/occupiers must comply with the requirements within the time limit as stipulated in the FSDns. If an owner or occupier fails to comply with an FSDn without a reasonable excuse, the owner or occupier would commit an offence and be liable upon conviction to a fine at level 4 (i.e. \$25,000 as at 30 June 2025) and to a further fine of \$2,500 for each day during which the failure continues after expiry of the time limit for compliance with the FSDn. The enforcement authorities may also apply to a magistrate for a fire safety compliance order (FSCO), directing the owner or occupier to comply with the requirements in the FSDn. An owner or occupier who fails to comply with an FSCO would commit an offence and be liable on conviction to a fine at level 5 (i.e. \$50,000 as at 30 June 2025) and to a further fine of \$5,000 for each day during which the failure continues after expiry of the time limit for compliance with the FSCO.

Figure 2

Enforcement procedures under FS(IB)O



Legend: An owner/occupier may apply for an extension of time to comply with FSDn

Source: *Audit analysis of FSD and BD records*

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1.9 When the fire safety improvement works required by an FSDn or an FSCO are completed, the owner or occupier should notify the enforcement authority concerned. If the enforcement authority is satisfied that the requirements specified in an FSDn or an FSCO have been duly complied with, it will issue a certificate of compliance to the owner or occupier. The relevant FSDn or FSCO will then cease to be in force.

1.10 If an owner or occupier fails to comply with an FSDn or an FSCO, and there are substantial risks if the building or part of the building is occupied, an enforcement authority may apply to the District Court for a prohibition order against the occupation of the building or any part of it. A person who, without reasonable excuse, contravenes a prohibition order would commit an offence, and be liable on conviction to a fine of \$250,000 and to imprisonment for three years, and to a further fine of \$25,000 for each day during which the contravention continues.

1.11 The implementation of FS(IB)O is in two phases, starting with some 400 TIBs constructed or with building plans first submitted for approval in or before March 1973. Since the majority of these TIBs are not installed with the automatic sprinkler system, which is a highly effective FSI capable of extinguishing or limiting the spread of a fire prior to the arrival of firefighters, FSD and BD will carry out inspection on them in Phase 1. The remaining TIBs (i.e. constructed or with building plans first submitted for approval between 1 April 1973 and 1 March 1987) are included in Phase 2 of the implementation. As at 30 June 2025, there were 1,212 TIBs, comprising 437 and 775 TIBs in Phases 1 and 2 respectively.

Fire safety of mini-storage premises

1.12 In the aftermath of the No. 4 alarm fire at the Amoyan Industrial Centre in Ngau Tau Kok on 21 June 2016, there were wide public concerns about the fire safety of mini-storage premises (MSPs) in Hong Kong. In order to improve the safety level of MSPs, relevant government departments, including FSD, BD, the Lands Department and the Labour Department, conducted a territory-wide inspection programme of MSPs during the period from 28 June 2016 to 11 June 2017.

1.13 Thereafter, FSD and BD conduct inspections on newly-identified MSPs containing cluster(s) of lockers/storage cubicles allowing direct access for the public to store and retrieve articles (i.e. target MSPs — Note 6). It is based on the past firefighting experience that these MSPs materially pose high fire and life risk. Against the irregularities in target MSPs in respect of fire safety perspective, FSD and BD have been taking enforcement actions under their respective legislations (Note 7), as follows:

- (a) **FSD.** If there is an existence of a fire hazard, FSD will issue a fire hazard abatement notice (FHAN) under the Fire Services (Fire Hazard Abatement) Regulation (Cap. 95F) to the operator of target MSP requiring the operator to abate the fire hazard within the period specified in the notice. Potential fire hazards in target MSPs commonly found are:
 - (i) undesirable arrangement of storage cubicles (see Photograph 2(a) for an example);
 - (ii) obstruction/insufficient number of windows;
 - (iii) insufficient coverage of hose reel system;
 - (iv) insufficient (e.g. missing/defective) exit signs and/or directional signs (see Photograph 2(b) for an example); and
 - (v) undesirable types of locking device for escape doors; and

Note 6: *According to FSD, MSPs may operate in various modes. An MSP containing cluster(s) of lockers/storage cubicles allowing direct access for the public to store and retrieve articles is identified to be a target MSP.*

Note 7: *According to the Security Bureau, relevant government departments (see para. 1.12) have been striving to collaborate and take enforcement actions under current legislations against the irregularities identified in target MSPs in the territory, and requiring the operators of MSPs and the owners of premises operating MSPs to abate potential safety hazards as quickly as possible. For MSPs, this audit review has focused on the work of FSD and BD from fire safety perspective.*

Photographs 2(a) and (b)

Examples of potential fire hazards in a target MSP

(a) Undesirable arrangement of storage cubicles



(b) Missing/defective exit signs and/or directional signs



Source: Photographs taken by Audit Commission staff on 20 June 2025

- (b) **BD.** If irregularities on fire safety construction (including means of escape, means of access of firefighting and rescue, and fire resisting construction) are identified in target MSPs, BD will issue statutory order(s) under sections 24(1) and/or 26 of the Buildings Ordinance to the owner of premises operating a target MSP requiring the owner to carry out rectification works within the period specified in the order. BD will also register these orders at the Land Registry, imposing an encumbrance on the land register. Examples of common contraventions in target MSPs are as follows:
- (i) **Section 24(1) of the Buildings Ordinance.** Excessive travel distance in the exit routes due to extensive partitioning of storage cubicles, inadequate width of exit routes along aisles between storage cubicles due to the swing-out doors of the cubicles, and replacement of fire doors by doors with inadequate fire resistance rating; and

- (ii) **Section 26 of the Buildings Ordinance.** Obstruction to the exit routes by exit doors with unsuitable locking devices (i.e. not readily openable from the inside without the use of a key).

According to FSD and BD, up to 30 June 2025, 1,460 target MSPs had been inspected, in which 724 target MSPs were still in operation.

Responsible departments

1.14 FSD is responsible for the enforcement of FS(IB)O in relation to TIBs' FSI, and the enforcement actions on target MSPs in the context of existence of fire hazards. The responsible teams/division (see Appendix A for an extract of the organisation chart of FSD as at 30 June 2025) are as follows:

- (a) ***Industrial Building Team.*** Under the Building Improvement Division 3 of FSD's Fire Safety Command, the Industrial Building Team is responsible for the implementation of FS(IB)O. As at 30 June 2025, it had an establishment of 43 staff;
- (b) ***MSP Team.*** Under the Building Improvement Division 3 of FSD's Fire Safety Command, the MSP Team is responsible for the enforcement actions on target MSPs under the Fire Services (Fire Hazard Abatement) Regulation. As at 30 June 2025, it had an establishment of 7 staff; and
- (c) ***Dangerous Goods Legislation Division.*** Under FSD's Licensing and Certification Command, the Dangerous Goods Legislation Division is responsible for, among others, FSD's prosecution matters including those related to FS(IB)O and MSPs (Note 8). As at 30 June 2025, it had an establishment of 16 staff in the Prosecution Section.

The actual expenditure of the Industrial Building Team and MSP Team for 2024-25 was about \$38.7 million.

Note 8: *In addition to handling FSD's prosecution matters, the Dangerous Goods Legislation Division is responsible for coordinating the legislative amendment exercise of the Dangerous Goods Ordinance (Cap. 295), formulating and implementing dangerous goods control policies and measures, and promoting the planning and development of dangerous goods stores.*

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1.15 BD is responsible for the enforcement of FS(IB)O in relation to TIBs' fire safety construction, and the enforcement actions on target MSPs in the context of fire safety construction. The responsible units (see Appendix B for an extract of the organisation chart of BD as at 30 June 2025) are as follows:

- (a) ***TIB Unit.*** Under the Fire Safety Section (FSS) of BD's Mandatory Building Inspection Division, the TIB Unit is responsible for the implementation of FS(IB)O. It is headed by a Senior Building Surveyor. As at 30 June 2025, it had an establishment of 24 staff. The staff cost of TIB Unit for 2024-25 was about \$19 million;
- (b) ***Squad Unit.*** Under BD's Existing Buildings Division 1, the Squad Unit is responsible for, among others, the enforcement actions on target MSPs under the Buildings Ordinance. As at 30 June 2025, it had an establishment of 8 staff in the MSP team; and
- (c) ***Building Safety Loan Scheme Unit.*** Under BD's Existing Buildings Division 1, the Building Safety Loan Scheme Unit is responsible for administering the Building Safety Loan Scheme. As at 30 June 2025, it had an establishment of 18 staff.

Audit review

1.16 In May 2025, the Audit Commission (Audit) commenced a review to examine the work of FSD and BD in upgrading the fire safety in industrial buildings. The audit review has focused on the following areas:

- (a) inspection and issuance of FSDns (PART 2);
- (b) follow-up actions on FSDns issued by FSD (PART 3);
- (c) follow-up actions on FSDns issued by BD (PART 4); and
- (d) other related issues (PART 5).

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

1.17 The Secretary for Security and the Director of Fire Services generally agree with the audit recommendations. They have expressed appreciation on Audit's efforts in conducting this study and making recommendations on the work relating to upgrading the fire safety in industrial buildings. They have said that FSD either has already implemented measures in addressing the observations, or will follow up on relevant recommendations as appropriate.

1.18 The Secretary for Development and the Director of Buildings generally agree with the audit recommendations and would like to thank Audit for the review and the recommendations on the work relating to upgrading the fire safety in industrial buildings. The Director of Buildings will, in collaboration with the Director of Fire Services if necessary, follow up on the recommendations within existing resources available by streamlining procedures, reprioritisation and use of technology.

Acknowledgement

1.19 Audit would like to acknowledge with gratitude the full cooperation of the staff of FSD and BD during the course of the audit review.

PART 2: INSPECTION AND ISSUANCE OF FIRE SAFETY DIRECTIONS

2.1 This PART examines FSD's and BD's work on inspection of TIBs and issuance of FSDns, focusing on:

- (a) implementation schedule for inspection of TIBs (paras. 2.2 to 2.15); and
- (b) issuance of FSDns (paras. 2.16 to 2.29).

Implementation schedule for inspection of target industrial buildings

2.2 As pledged during the legislative stage of FS(IB)O, the implementation of the Ordinance would be carried out in two phases, starting with TIBs constructed or with building plans first submitted for approval in or before March 1973 (i.e. Pre-March 1973's TIBs). Phase 2, covering TIBs constructed or with building plans first submitted for approval on or before 1 March 1987 (i.e. between 1 April 1973 and 1 March 1987), would commence after the completion of Phase 1. In 2020, it was estimated that there were around 1,100 TIBs (400 TIBs under Phase 1 and 700 TIBs under Phase 2).

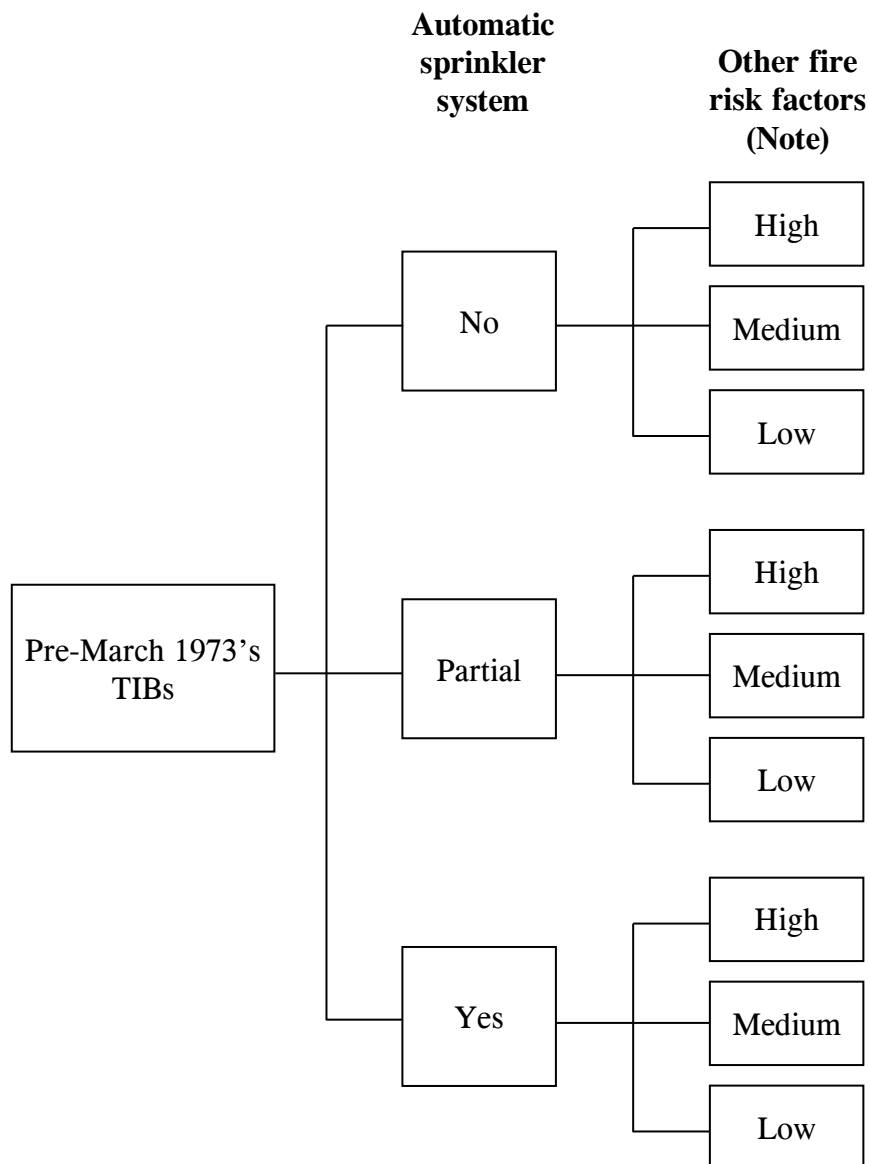
2.3 To ensure smooth and orderly implementation, FSD and BD worked out a framework for determining the priority of inspection for TIBs in Phase 1, starting with the fire risk assessed by FSD. According to FSD, since automatic sprinkler system is a highly effective FSI capable of limiting or extinguishing a fire prior to the arrival of firefighters, TIBs that are not sprinkler-protected are exposed to the highest risk, followed by those partially sprinkler-protected (i.e. the automatic sprinkler system not covering the whole building) and sprinkler-protected. After categorising TIBs into these three groups, FSD then prioritised TIBs based on other fire risk factors and classified them as high, medium and low risk in each group. Factors that lead to a higher potential fire risk include high-rise building, non-provision of fireman's lift, non-provision of protected lobby to fireman's lift and TIBs with MSPs.

2.4 As mentioned in paragraph 1.11, there were 1,212 TIBs (437 TIBs under Phase 1 and 775 TIBs under Phase 2) as at 30 June 2025. According to the Controlling

Officer’s Reports of FSD and BD, the target number of TIBs jointly inspected is 60 in each year. With reference to the annual inspection target, FSD and BD set out the implementation schedule, prioritising TIBs under Phase 1 that are not sprinkler-protected, in the order of other fire risk factors (i.e. high, medium and low) assessed by FSD, and then by building age (i.e. older building would be inspected first) (see Figure 3).

Figure 3

Implementation schedule for inspection of TIBs under Phase 1



Source: Audit analysis of BD records

Note: In each category of other fire risk factors (i.e. high, medium or low), older buildings would be inspected first.

Inspection and issuance of fire safety directions

2.5 The implementation schedule is reviewed annually by FSD and BD to take account of the latest status of the TIBs (Note 9). As at 30 June 2025, there were 437 TIBs under Phase 1 and of which, 273 (62% of 437) TIBs had been jointly inspected by FSD and BD.

Room for improvement in drawing up implementation schedule for inspection of TIBs

2.6 According to FSD and BD, the availability of automatic sprinkler system was the major factor in determining the priority of inspection for TIBs under Phase 1. As at 30 June 2025, of the 437 TIBs under Phase 1 (see Table 1):

- (a) 273 (62%) TIBs had not been installed with any automatic sprinkler system. Of which, 211 (77% of 273) had been inspected;
- (b) 72 (17%) TIBs had been installed with automatic sprinkler system but the system might not cover the whole building (i.e. with partial sprinkler system only). Of which, 52 (72% of 72) had been inspected; and
- (c) 92 (21%) TIBs had been installed with a set of automatic sprinkler systems for the whole buildings. Of which, 10 (11% of 92) had been inspected.

Note 9: *According to BD, the implementation schedule may be refined taking into account the following:*

- (a) demolition or wholesale conversion of TIBs in progress;*
- (b) major repair works of TIBs carried out within four years;*
- (c) the locations of TIBs which are within the same lot or subject to the same Deed of Mutual Covenant; and*
- (d) TIBs having genuine difficulty (e.g. site constraint) in providing fireman's lifts.*

Inspection and issuance of fire safety directions

Table 1

**Inspection of TIBs under Phase 1
(30 June 2025)**

	Number of TIBs			
	Without any automatic sprinkler system	With partial sprinkler system only	With automatic sprinkler system	Total
<i>Inspected in:</i>				
2020	3	–	–	3
2021	60	–	–	60
2022	58	1 (Note 1)	1 (Note 1)	60
2023	58	1 (Note 1)	1 (Note 1)	60
2024	32	27 (Note 2)	1 (Note 1)	60
2025 (up to June)	0	23	7 (Notes 1 & 2)	30
<i>Number of TIBs inspected</i>	211	52	10	273
<i>Number of TIBs not yet inspected</i>	62	20	82	164
Total	273 (62%)	72 (17%)	92 (21%)	437 (100%)

Source: Audit analysis of FSD and BD records

Note 1: According to FSD and BD, for a group of TIBs located within the same lot/under the same owners' corporation/subject to the same Deed of Mutual Covenant, the inspection would be conducted in one go. Hence, 2 TIBs in 2022, 2 TIBs in 2023, 1 TIB in 2024 and 2 TIBs in 2025 were included in the implementation schedule in the respective years, notwithstanding that they were installed with partial or full automatic sprinkler systems.

Note 2: Inspections for TIBs with partial sprinkler system began in 2024 and inspections for TIBs with automatic sprinkler system began in 2025.

Inspection and issuance of fire safety directions

2.7 As shown in Table 1 in paragraph 2.6, as at 30 June 2025, of the 345 (273+72) TIBs without any automatic sprinkler system or with partial sprinkler system only, 82 (62+20) (i.e. 24% of 345) TIBs had not been inspected by FSD and BD. According to BD:

- (a) 37 TIBs required further study by FSD and BD since there was no lift in these TIBs (see paras. 2.8 and 2.9);
- (b) 26 TIBs had undergone major repair works in recent years (see para. 2.10);
- (c) 3 TIBs had only one storey and were considered as having low fire risk;
- (d) 7 TIBs would be demolished or were in the progress of wholesale conversion for uses other than industrial;
- (e) 1 TIB was under the same owners' corporation with other TIBs under Phase 2; and
- (f) 8 TIBs were scheduled to be inspected in 2025.

2.8 *Need to make continued efforts in exploring a feasible and practicable approach for complying with FS(IB)O by owners of TIBs without lifts.* Under Phase 1, there are 39 TIBs without lifts (including the 37 TIBs that are not sprinkler-protected or with partial sprinkler system only — see para. 2.7(a)). According to BD, as one of the requirements for the Means of Access for Firefighting and Rescue under the Code of Practice for Fire Safety in Buildings 2011 (October 2015 version), a fireman's lift should be provided for industrial buildings:

- (a) exceeding two storeys; or
- (b) exceeding one storey and either exceeding 30 metres in height or 7,000 cubic metres in cubical extent (Note 10).

Note 10: *“Cubical extent” means the space contained within the external surfaces of the walls and roof of a building and the upper surface of the floor of its lowest storey, excluding any space within any enclosure on the roof used exclusively for accommodating a water tank or lift gear or any other services, and, if any side of the building is not enclosed by a wall, that side shall be deemed to be enclosed by a wall extending downwards from the outer edge of the roof.*

Inspection and issuance of fire safety directions

2.9 Upon enquiry, FSD and BD informed Audit in September and October 2025 that:

- (a) during the detailed study for preparing the implementation schedule for 2024 in late 2023, it was revealed that TIBs without lifts in the approved building plans might encounter genuine site constraints in providing a fireman's lift. Pursuant to FS(IB)O, if an enforcement authority (i.e. FSD or BD) considered that it would be unreasonable to direct the owner to comply with a fire safety requirement having regard to the structural integrity, the technology available or other relevant factors, the authority might direct the owner to take other measures the authority considered appropriate instead of complying with the requirement. In this connection, these TIBs without any lifts in the approved plans had been rescheduled for inspection to a later stage of Phase 1 in order for BD to carry out further study and to explore/formulate commensurable and feasible alternative measures;
- (b) the enforcement authority would adopt a flexible and pragmatic approach in handling these cases on the premise that the basic fire safety would not be compromised. In this regard, an initial working meeting was held between FSD and BD in March 2024 to discuss the way forward in respect of the means of access for firefighting and rescue;
- (c) since the design on the installation of sprinkler heads was dependent on the compartmentations and layouts of TIBs, FSD and BD issued FSDns to the owners at the same time with a view to enabling owners to appoint registered building professionals/RFSICs to handle all necessary works in one go. In this connection, FSD considered that it was not feasible to issue FSDns to owners of TIBs without any lifts and require them to work on the installation of automatic sprinkler system before the alternative measures were formulated; and
- (d) FSD and BD were conducting a detailed analysis for the 39 TIBs without lifts (including the 37 TIBs that were not sprinkler-protected or with partial sprinkler system only) in Phase 1 to categorise them into different batches on a risk basis, in order to formulate an implementation plan and establish alternative requirements, taking into account the building design features and other similarities.

Inspection and issuance of fire safety directions

Audit considers that BD needs to make continued efforts in exploring a feasible and practicable approach for complying with FS(IB)O by owners of TIBs without lifts.

2.10 *Need to regularly review the implementation schedule for inspection of TIBs under Phase 1.* According to BD's Fire Safety Section Manual (FSSM), a lower priority would be accorded to TIBs having undergone major repair works in BD's earlier large-scale operation not more than four years from the date of scheduled inspection so as to avoid undue disturbance to the owners. Inspection to these buildings would be re-scheduled to the end of their respective phases. In this connection, 26 TIBs that are not sprinkler-protected or with partial sprinkler system only (see para. 2.7(b)) have been deferred for inspection to the end of Phase 1. According to BD, these major repair works were usually prescribed repair works found necessary of the common parts, external walls and projections or signboards of TIBs under the Mandatory Building Inspection Scheme. Upon enquiry, BD informed Audit in September and October 2025 that:

- (a) the major repair works of these TIBs were completed between July 2017 and April 2025; and
- (b) it was a matter of enforcement priority and BD would review the implementation schedule annually (see para. 2.5).

In Audit's view, since the major repair works might not aim for enhancing the fire safety of the building and the major repair works of some TIBs have been completed more than four years ago, BD needs to, in collaboration with FSD, regularly review the implementation schedule for inspection of TIBs under Phase 1, taking into account the prevailing fire risk of TIBs.

2.11 *Need to accord inspection priority to the three TIBs under Phase 2 which are not sprinkler-protected.* According to the implementation plan, Phase 2 covers TIBs constructed or with building plans first submitted after March 1973, for which industrial buildings with more than two storeys were required to be equipped with automatic sprinkler systems (unless the planned occupancy would prohibit the use of water as a fire-fighting media) under the then FSI code. While it was estimated that inspection of TIBs under Phase 2 would commence in 2028, FSD performed preliminary study for these TIBs on the provision of automatic sprinkler systems. According to the study, there were 712 TIBs with more than two storeys under

Inspection and issuance of fire safety directions

Phase 2 and among which, 5 TIBs were without any automatic sprinkler systems. Upon enquiry, FSD informed Audit in October 2025 that:

- (a) 2 TIBs had been demolished and for the other 3 TIBs, the installation of automatic sprinkler system was not required in accordance with the building design and use at the time when the buildings were constructed; and
- (b) FSD had planned to collaborate with BD to accord inspection priority to these 3 TIBs under Phase 2.

Audit considers that FSD and BD need to accord inspection priority to the three TIBs under Phase 2 which are not sprinkler-protected.

Audit recommendations

2.12 **Audit has recommended that the Director of Fire Services and the Director of Buildings should accord inspection priority to the three TIBs under Phase 2 which are not sprinkler-protected.**

2.13 **Audit has recommended that the Director of Buildings should:**

- (a) **make continued efforts in exploring a feasible and practicable approach for complying with FS(IB)O by owners of TIBs without lifts; and**
- (b) **in collaboration with FSD, regularly review the implementation schedule for inspection of TIBs under Phase 1, taking into account the prevailing fire risk of TIBs.**

Response from the Government

2.14 The Director of Fire Services agrees with audit recommendation in paragraph 2.12. He has said that FSD, in collaboration with BD, has planned to put the three TIBs without any sprinkler system as a priority for inspection under Phase 2.

Inspection and issuance of fire safety directions

2.15 The Director of Buildings agrees with the audit recommendations in paragraphs 2.12 and 2.13. He has said that:

- (a) BD has been liaising with FSD and will continue to explore a feasible and practicable approach for complying with FS(IB)O by owners of TIBs without lifts. BD targets to come up with a concrete proposal by the first quarter of 2026; and
- (b) in BD's annual review of the implementation schedule with FSD, the prevailing fire risk of the TIBs that have undergone major repair works will also be taken into account in determining the priority for inspection. In other words, TIBs with major repair works carried out recently will not be automatically accorded with a lower priority for inspection. BD will take into account the fire safety risk such TIBs are subject to in determining the priority of inspection. BD will amend FSSM accordingly to make clear the requirements to be observed by its staff.

Issuance of fire safety directions

2.16 Initial inspection is carried out jointly by FSD and BD. In order to facilitate the work planning and assignment of inspection officers, FSD and BD confirm the monthly inspection schedule around two months in advance of the scheduled inspection. Notification letters are served to owners/occupiers of the TIB two weeks before the date of initial joint inspection by posting upon conspicuous common parts and individual units of the TIB.

2.17 During the inspection:

- (a) BD carries out inspection generally in the common parts of TIBs, on a floor-by-floor basis. Inspections of individual units will only be carried out if so warranted, for example, when there is doubt about possible contraventions or when upgrading works are likely to be required under the Code of Practice; and
- (b) FSD obtains the particulars of all occupiers as far as practicable and relevant building information at the scene. In addition, Building Services Inspectors/Assistant Building Services Inspectors of FSD assist the inspection

officer to assess the technical aspects of the existing FSI and ventilating system provided in the premises.

Need to review existing procedures and explore alternative measures for issuing FSDns regarding mechanical ventilating system in locked units which FSD cannot inspect

2.18 According to FSD, during initial inspections, for the locked units (Note 11), it would post a notice at the door of the units, requesting the occupier to provide information including the name and contact number, by returning the reply slip or contacting FSD directly. If there is no reply two weeks after the initial inspection, FSD will conduct up to 3 visits (2 during office hours and 1 in the evening) to inspect the units. Pursuant to FS(IB)O (see also Figure 1 in para. 1.6(a)), the occupier is required to:

- (a) provide or improve emergency lighting within the area occupied by him to facilitate the evacuation of persons in the area in the event of a power failure; and
- (b) provide or improve an automatic cut-off device for mechanical ventilating system to limit the spread of smoke through the system if:
 - (i) a mechanical ventilating system is provided in the occupied area and the system serves only the occupied area; and
 - (ii) the system has a capacity to process air at a rate exceeding one cubic metre per second or serves more than one fire compartment located within the occupied area.

2.19 Audit noted that for locked units which FSD could not inspect, the requirement of the provision or improvement of emergency lighting within the area occupied by the occupier was included in the FSDns issued to the owners. However, FSD would not issue FSDns relating to the requirement of automatic cut-off device for mechanical ventilating system in the occupied area to the owners/occupiers if inspection could not be conducted. In October 2025, FSD informed Audit that:

Note 11: *Locked units include those vacant units which FSD could not inspect.*

Inspection and issuance of fire safety directions

- (a) there was a clear distinction between the two abovementioned fire safety requirements in terms of their applicability. As emergency lighting was a fundamental provision required in all units, it was FSD's standard practice to include this requirement in every FSDn issued to owners, regardless of inspection access. In contrast, the requirement to install an automatic cut-off device for a mechanical ventilating system was not imposed automatically, as its applicability depended on the actual configuration of each unit's ventilation system. This approach was supported by FSD records, which indicated that as at 30 June 2025, only about 6.5% of all inspected units required a cut-off device;
- (b) it sample checked 16 TIBs inspected as at 30 June 2025. Of which, less than one-fifth (153 out of 789) of the total units were locked which FSD could not inspect at the time; and
- (c) given the universal applicability of the emergency lighting requirement and the limited, case-specific applicability of the cut-off device requirement, its current approach was to include the former in all FSDns issued to owners, while seeking to inspect premises as far as practicable to determine whether the latter may be warranted. This ensured that installation requirements were imposed having regard to factors including site conditions and technical assessment.

2.20 Pursuant to FS(IB)O, FSD has the power to require a person to provide information that may identify an occupier. In this connection, FSD has been requiring information of occupiers through the building management offices of TIBs. Audit considers that FSD needs to review its existing procedures and explore alternative measures for issuing FSDns regarding the provision of an automatic cut-off device for mechanical ventilating system in locked units which FSD cannot inspect.

Room for improvement in serving FSDns

2.21 Ownership check with the Land Registry is required in order to serve FSDns successfully. FSD and BD have agreed that BD is responsible for ownership check (other than car parking spaces). The ownership details shall be copied to FSD and the fees charged by the Land Registry will be shared by FSD and BD equally. Since the ownership details of car parking spaces are normally not required by BD, FSD will be responsible for ownership check of car parking spaces at its own cost.

Inspection and issuance of fire safety directions

2.22 According to FS(IB)O, there are several means to serve FSDns to the owners/occupiers, including delivering personally, sending by registered post, facsimile transmission and electronic mail, leaving with an adult occupier, and posting at a conspicuous place inside the building or part. In order to ensure the acknowledgement of FSDn by the respective owner/occupier, FSD and BD have agreed that two separate means of service should normally be used for issuance for FSDns, which are, sending by registered post and posting at a conspicuous place inside the building or part.

2.23 *Timeliness of issuance of FSDns.* After the initial inspection and obtaining the relevant information of owners/occupiers, FSD and BD separately prepare their own FSDns requiring the owners/occupiers to provide or improve the FSI and improve the fire safety construction of TIB to the required standards. FSD and BD issue their own FSDns on an agreed date (as far as possible) and the date of issuance should be, in principle, within four months after the initial inspection (i.e. the 4-month target). As at 30 June 2025, 17,727 and 6,566 FSDns were issued by FSD and BD respectively (Note 12) to the owners/occupiers of 252 TIBs. In order to examine the timeliness in issuance of FSDns, Audit performed analysis of the 273 TIBs inspected as at 30 June 2025 (see Table 2) and noted that:

- (a) FSD and BD issued FSDns to owners and occupiers of 179 (65%) TIBs within four months after the inspection;
- (b) FSD and BD issued FSDns to owners and occupiers of 73 (27%) TIBs more than four months after the inspection;
- (c) FSDns had not been issued to owners/occupiers of 1 (1%) TIB more than four months after the inspection (Note 13); and
- (d) the 4-month target had not yet been due for 20 (7%) TIBs.

Note 12: *According to FSD, in addition to owners, FSD also issued FSDns to occupiers for provision or improvement of emergency lighting and if applicable, an automatic cut-off device for mechanical ventilating system (see para. 2.18). Therefore, the number of FSDns issued by FSD was significantly larger than that issued by BD.*

Note 13: *The FSDns were subsequently issued in July 2025, 16 days beyond the 4-month target.*

Inspection and issuance of fire safety directions

Upon enquiry, FSD and BD informed Audit in October 2025 that the late issuance was mainly due to FSD's efforts and special duties in combating the coronavirus disease (COVID-19), government-wide special work arrangement during the outbreak of the COVID-19 epidemic and the lead time required for obtaining ownership information (Note 14). In Audit's view, since the timely issuance of FSDns is vital as it triggers the entire process for improving the fire safety of TIBs, FSD and BD need to make continued efforts in enhancing the timeliness of issuance of FSDns.

Table 2

**Time taken to issue FSDns after inspection
(January 2021 to June 2025)**

	Year of issuance					Total number of TIBs
	2021	2022	2023	2024	2025 (up to June)	
<i>Number of TIBs with FSDns issued</i>						
Within 4 months	38	38	42	38	23	179 (65%)
More than 4 to 5 months	2	4	11	17	7	41 (15%)
More than 5 to 6 months	1	5	6	2	2	16 (6%)
More than 6 months (Note)	0	8	8	0	0	16 (6%)
Sub-total	41	55	67	57	32	252 (92%)
<i>Number of TIBs with FSDns not yet issued</i>						21 (8%)
Total						273 (100%)

73
(27%)

Source: Audit analysis of FSD and BD records

Note: The longest time taken to issue FSDn was 8 months.

Note 14: According to BD, the ownership information, including assignment plans for the extent of individual units, is essential for formulating requirements by BD. Most old TIBs with approved warehouses/workshops of larger size are found to be further divided into smaller units. BD needs to verify the ownership details with assignment plans of these smaller units prior to preparing the FSDns.

Inspection and issuance of fire safety directions

2.24 Audit examination of the records of the 16 TIBs (Note 15) in which FSD and BD took more than 6 months to issue FSDns after initial inspections revealed that:

- (a) ***Internal target of preparing the inspection reports not met by FSD attributable to the impact of COVID-19 epidemic.*** While the Fire Protection Commands Procedural Instructions (CPI(FP)) stipulates an internal target that FSD's inspection officer should prepare an inspection report on the result of inspection and the proposed fire safety requirements within 10 weeks after the inspection for endorsement by the Assistant Divisional Officer, the internal target could not be met for 10 (63%) TIBs. According to FSD, similar to the reasons of late issuance of FSDns as mentioned in paragraph 2.23, the reason for not meeting the target was due to the implementation of special work arrangements and staff deployment for special duties during the outbreak of COVID-19 epidemic;

- (b) ***Need to consider stipulating an internal target for BD's endorsement process.*** According to FSSM, a standard proforma for assessment of fire safety, along with inspection reports comprising floor plans showing the existing conditions of the units/building and suitable photo records should be completed by a BD's inspection officer (i.e. Survey Officer), checked and recommended by a Building Surveyor and endorsed by a Senior Building Surveyor. However, there was no guideline stipulating the timeframe for each phase. Audit noted that for 11 (69%) TIBs, the Building Surveyors completed the review of the proformas 4 months after the inspection. According to BD, the above process was affected by the government-wide special work arrangement during the outbreak of COVID-19 epidemic; and

- (c) ***Need to consider conducting ownership check earlier for TIBs involving a large quantity of units.*** For each TIB, BD sends the memorandum to the Land Registry, requesting for the provision of the names and the addresses of all registered owners of the units (excluding car parking spaces), names and addresses of the owners' corporation (if any), copy of Deed of Mutual Covenant and the assignment plans within four weeks. However, BD received the reply from the Land Registry after more than four weeks in all

Note 15: *The number of units involved in each of these 16 TIBs ranged from 28 to 271 units.*

Inspection and issuance of fire safety directions

of the 16 TIBs, ranging from 6 to 28 weeks (Note 16). In November 2023, a meeting was held between BD and the Land Registry. According to the meeting notes:

- (i) the Land Registry mentioned the difficulties in providing timely response in view of the relatively large number of requests clustered during specific periods of the year, which would be further compounded by competing ownership checking requests from other departments. The Land Registry also said that, for requests on a single building with not more than 200 units, the reply could be made within two months in general; and
- (ii) for requests involving extensively large quantity of units, BD would endeavor to make the request much earlier to allow more buffer time for the Land Registry's processing.

Audit considers that with a view to ensuring the timeliness of issuance of FSDns, BD needs to consider conducting ownership check earlier for TIBs involving a large quantity of units.

Audit recommendations

2.25 **Audit has recommended that the Director of Fire Services and the Director of Buildings should make continued efforts in enhancing the timeliness of issuance of FSDns.**

2.26 **Audit has recommended that the Director of Fire Services should review FSD's existing procedures and explore alternative measures for issuing FSDns regarding the provision of an automatic cut-off device for mechanical ventilating system in locked units which FSD cannot inspect.**

Note 16: *According to the Land Registry, longer processing time was required for the provision of the ownership information to BD in 2022-23 due to a backlog accumulated under the government-wide special work arrangement implemented during the outbreak of COVID-19 epidemic.*

- 2.27 **Audit has recommended that the Director of Buildings should:**
- (a) **consider stipulating an internal target for the endorsement process of the issuance of FSDns; and**
 - (b) **consider conducting ownership check earlier for TIBs involving a large quantity of units with a view to ensuring the timeliness of issuance of FSDns.**

Response from the Government

2.28 The Director of Fire Services agrees with the audit recommendations in paragraphs 2.25 and 2.26. He has said that:

- (a) the past delay in issuance of FSDns was due to the impact of COVID-19 epidemic, and FSD will make continued efforts in monitoring and ensuring the timeliness of issuance of FSDns;
- (b) in addition to the measures implemented in paragraph 2.20, FSD has reviewed its procedures with alternative measure explored having regard to the important function of the automatic cut-off device for mechanical ventilating system to limit the spread of smoke through the ventilating system in case of fire. The alternative measure explored is the incorporation into FSDns issued to owners the requirement for installing an automatic cut-off device for mechanical ventilating systems. That being the case, as mentioned in paragraph 2.19(a), it is noteworthy that the need for an automatic cut-off device depends on the specific circumstances of each unit. Therefore, owners receiving FSDns with this requirement, particularly for the case of locked units which FSD could not inspect, may need to ascertain whether installation of the automatic cut-off device is necessary for their particular units having regard to the circumstances of their units. FSD can provide advice on this front, and no follow-up action will be required if it is confirmed that the said device is not necessary for a particular unit. This arrangement can promote procedural convenience on the one hand, and enhance clarity to owners from the perspective of the overall potential scope of fire safety requirements on the other; and

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- (c) a supplementary note will be attached to the FSDn requiring the owner to provide FSD with any available contact information of the occupier, where the unit is rented out with tenant, to facilitate enforcement actions against the occupier when necessary.

2.29 The Director of Buildings agrees with the audit recommendations in paragraphs 2.25 and 2.27. He has said that:

- (a) majority of the cases with progress affected as mentioned in paragraph 2.23 were due to the government-wide special work arrangement during the outbreak of COVID-19 epidemic and lead time for obtaining ownership information including assignment plans amongst others. Nonetheless, BD will conduct ownership check earlier as recommended in paragraph 2.27(b). BD will closely monitor the checking of ownership information and liaise with the Land Registry again on whether there is further room to streamline the ownership and assignment plans checking process; and
- (b) BD will set an internal target for the endorsement process of the issuance of FSDns.

PART 3: FOLLOW-UP ACTIONS ON FIRE SAFETY DIRECTIONS ISSUED BY THE FIRE SERVICES DEPARTMENT

3.1 This PART examines the follow-up actions on FSDns issued by FSD, focusing on:

- (a) overall compliance with FSDns (paras. 3.2 to 3.11);
- (b) administration of FSDns (paras. 3.12 to 3.27);
- (c) prosecution actions (paras. 3.28 to 3.36); and
- (d) publishing information (paras. 3.37 to 3.40).

Overall compliance with fire safety directions

3.2 FSDns issued by FSD can be broadly classified into two types:

- (a) ***Involving common parts.*** These FSDns are issued to owners and generally involve the provision or improvement of FSI in common parts, or integration of FSI among different parts of the buildings, e.g. provision or improvement of automatic sprinkler system which requires a fire service tank (usually at common parts) and connection from the fire service tank to sprinkler heads inside individual units; and
- (b) ***Inside individual units.*** These FSDns are issued to occupiers and generally involve provision of emergency lighting and/or automatic cut-off device for mechanical ventilating system inside individual units.

The owner/occupier is required to comply with the requirements as specified in FSDn before the specified date. In general, the time limit for compliance with an FSDn is 12 months from the issue date of the FSDn, while for an FSDn issued to an occupier only directing to provide emergency lighting, the time limit is usually 6 months.

Follow-up actions on fire safety directions issued by the Fire Services Department

Need to keep in view the progress of provision or improvement of FSI

3.3 Since the implementation of FS(IB)O on 19 June 2020 and up to 30 June 2025, FSD had issued 17,727 FSDns for 252 TIBs. Among the 17,727 FSDns (see Table 3):

- (a) 6,823 (39%) FSDns had ceased to be in force, including:
 - (i) 5,668 (32%) FSDns which had been complied with. All were issued for the provision or improvement of FSI inside individual units of TIBs;
 - (ii) 1,085 (6%) FSDns which had been withdrawn due to the change of owners/occupiers, the conversion of two TIBs into commercial use, the demolition of a TIB, etc. (see paras. 3.21 and 3.22); and
 - (iii) 70 (1%) FSDns which had been replaced by FSCOs issued by the magistrates; and

- (b) 10,904 (61%) FSDns remained in force with outstanding improvement works, including:
 - (i) 2,908 (16%) FSDns of which the dates of initial specified time limit were after 30 June 2025;
 - (ii) 7,109 (40%) FSDns which had been granted extension of time (EoT) with specified time limit after 30 June 2025 (see paras. 3.23 to 3.25); and
 - (iii) 887 (5%) FSDns of which the compliance period had expired (see paras. 3.29 to 3.32).

**Follow-up actions on fire safety directions
issued by the Fire Services Department**

Table 3

**Status of FSDns issued by FSD
(30 June 2025)**

Status	Number of FSDns		
	for fire safety requirements involving common parts issued to owners (Note 1)	for fire safety requirements inside individual units issued to occupiers	Total
<i>Ceased to be in force</i>			
Complied with	0	5,668	5,668 (32%)
Withdrawn	299	786	1,085 (6%)
Replaced by FSCOs (Note 2)	69	1	70 (1%)
Subtotal (a)	368	6,455	6,823 (39%)
<i>Remained in force with outstanding improvement works</i>			
Compliance period not yet expired			
- Without EoT	2,377	531	2,908 (16%)
- With EoT	6,998	111	7,109 (40%)
	<u>9,375</u>	<u>642</u>	<u>10,017 (56%)</u>
Compliance period expired	605	282	887 (5%)
Subtotal (b)	9,980	924	10,904 (61%)
Total (c)=(a)+(b)	10,348	7,379	17,727 (100%)

Source: Audit analysis of FSD records

Note 1: This includes fire safety improvement works inside individual units which involve integration of FSI (e.g. automatic sprinkler system) among different parts of the buildings (see para. 3.2(a)).

Note 2: The FSCO issued to the occupier for fire safety requirements inside individual unit had been complied with in March 2025. For the FSCOs issued to owners for fire safety requirements involving common parts, all of them had not been complied with as at 30 June 2025.

Follow-up actions on fire safety directions issued by the Fire Services Department

3.4 As at 30 June 2025, excluding the withdrawn FSDns (see para. 3.3(a)(ii)), the compliance rates of FSDns and FSCOs for fire safety requirements involving common parts and inside individual units were 0% and 86% (i.e. $(5,668+1)/(7,379-786)$) respectively. Overall, Audit noted that after more than five years since the implementation of FS(IB)O on 19 June 2020, no TIBs had completed the provision or improvement of FSI involving common parts in accordance with FS(IB)O. According to FSD, it closely monitored the work progress of the 249 TIBs (Note 17) with relevant FSDns and/or FSCOs in force as at 30 June 2025 and these TIBs were under the different stages as follows:

- (a) for 77 (31%) TIBs, the owners were undergoing discussion and about to appoint registered building professionals and/or RFSICs;
- (b) for 122 (49%) TIBs, registered building professionals and/or RFSICs were appointed and layout plans of the automatic sprinkler systems were yet to be submitted. For 63 of these 122 TIBs, FSD noted positive progress of other FSI components, such as installation of emergency lighting and exit signs, and submission of layout plans of the fire hydrant and hose reel system and the manual fire alarm system;
- (c) for 45 (18%) TIBs, layout plans of the automatic sprinkler system were submitted, of which those of 7 TIBs were under FSD's review and those of 38 TIBs were rejected by FSD;
- (d) for 1 (1%) TIB, the fire safety improvement works had commenced; and
- (e) for the remaining 4 (1%) TIBs, 3 TIBs were undergoing revitalisation or demolition and the owners of 1 TIB were declared bankrupt. FSD would keep in view the validity of the relevant FSDns.

Note 17: *As at 30 June 2025, 10,348 FSDns for fire safety requirements involving common parts had been issued to the owners of 252 TIBs, in which 2 TIBs had been converted into commercial use and 1 TIB had been demolished. Thus, the relevant FSDns were withdrawn (see para. 3.3(a)(ii)).*

Follow-up actions on fire safety directions issued by the Fire Services Department

- 3.5 Upon enquiry, FSD informed Audit in September and October 2025 that:
- (a) fire safety improvement works involved extensive coordination and detailed planning, and an average lead time of 5 to 8 years would be required for completion. In particular, the improvement works involving common parts for compliance with FS(IB)O were highly complex. To comply with an FSDn involving common parts, the owners should hold meetings to reach a consensus, appoint consultancy firms and RFSICs, submit layout plans for various systems to FSD for approval, carry out the installation of different FSI and arrange acceptance inspections. These processes were time-consuming, particularly for buildings with multiple owners (Note 18);
 - (b) the progress of improvement works for TIBs under single ownership was in general faster in earlier stages. In contrast, under multiple ownership, it remained challenging for owners' corporations of TIBs to reach a consensus among individual owners, and even more difficult for TIBs without any owners' organisation where coordination was significantly harder;
 - (c) FS(IB)O required the installation of fire service tanks for the automatic sprinkler system and the fire hydrant and hose reel system, which might have capacity requirements of up to 185,000 liters. Some older TIBs, originally designed without sprinkler systems, might face structural or spatial constraints, requiring assessments by qualified structural engineers. In addition, some TIBs might lack common space for fire service tanks or other FSI components (e.g. pumps and gauges), requiring installation inside individual units. This inevitably involved obtaining consents from respective owners, and more time for negotiation was required;
 - (d) FSD had established the Building Improvement Support Centre (Note 19) to provide the owners with one-stop support services. The services

Note 18: *Of the 249 TIBs with FSDns and/or FSCOs in force as at 30 June 2025, 48 TIBs were under single ownership, 185 TIBs were with owners' corporation formed and 16 TIBs were without any owners' organisation.*

Note 19: *The Centre assists owners and occupiers of old buildings in complying with the requirements under FS(IB)O, as well as the Fire Safety (Commercial Premises) Ordinance and the Fire Safety (Buildings) Ordinance. As at 30 June 2025, the Centre operated a hotline and the public might visit its three offices in Wanchai, Mongkok and Yuen Long respectively.*

Follow-up actions on fire safety directions issued by the Fire Services Department

included provision of information and assistance regarding coordination, technical support and financial assistance, with a view to improving the overall fire safety standards of target buildings;

- (e) given that prolonged negotiation was foreseeable, the owners might apply for EoT for FSDns issued by FSD. Supporting documents indicating positive progress of the improvement works should be provided by the owners for FSD's approval. To strike a balance between fire protection and avoiding undue burdens on owners, FSD had adopted a flexible and pragmatic approach when processing applications for EoT, to allow reasonable time and flexibility to owners to fulfill the fire safety requirements progressively. Conversely, FSD would instigate prosecution if no significant progress was noted and no reasonable excuse was provided; and

- (f) in fact, owners of many TIBs were making positive progress in taking forward fire safety improvement works and the TIBs were in different stages showing progress for complying with the requirements of FS(IB)O (see para. 3.4). FSD anticipated that the focuses of its works on enforcing FS(IB)O in the coming years would shift to approval of layout plans, inspection of works and acceptance inspections. Furthermore, taking into account the continuous rolling out of 60 TIBs every year and the long lead time to complete the fire safety improvement works, the number of accumulated active cases would inevitably increase, necessitating a corresponding increase in manpower to ensure effective oversight and enforcement.

3.6 Although FS(IB)O has been in force for more than five years, the fire safety improvement works involving common parts have yet to commence for most of the TIBs (i.e. 248 (99%) out of 249 TIBs — see para. 3.4(d)). While noting that improvement works involving common parts are more complex due to building constraints and the need of reaching consensus among owners, and that FSD has rendered assistance to relevant parties on various fronts (see para. 3.5(d) and (e)), Audit considers that FSD needs to keep in view the progress of provision or improvement of FSI by owners and make continued efforts in offering necessary assistance to owners where appropriate.

Need to make continued efforts in assisting the industries to improve the quality of layout plans

3.7 Before commencing the fire safety improvement works for compliance with FS(IB)O, the registered building professionals or RFSICs should submit the layout plans according to the detailed specifications and requirements set out in the April 2012 version of FSI code for FSD's approval. As stipulated in CPI(FP), the target timeframe for FSD to process layout plans is normally not more than 8 weeks from the date of receipt, and depending on the complexity, may be extended to not more than 12 weeks.

3.8 In 2024, FSD received 50 layout plans submitted for 36 TIBs, of which, 3 (6%) layout plans were approved and 47 (94%) layout plans were rejected. Audit noted that FSD took 2 to 12 weeks to process these 50 layout plans which met the target timeframe as stipulated in CPI(FP) (i.e. not more than 12 weeks). In view of the high rejection rate, Audit conducted sample examination of 8 rejected layout plans and noted that there were deviations from the applicable FSI code, as follows:

- (a) in all of the 8 layout plans, the proposed automatic sprinkler systems did not have adequate coverage or the coverage was not clearly marked (Note 20);
- (b) in all of the 8 layout plans, the proposed manual fire alarm systems did not have adequate call points, or the call points were proposed at incorrect locations (Note 21); and
- (c) in 6 (75%) layout plans, regarding the proposed fire hose and hose reel system, there were insufficient hydrants and hose reels on each floor to ensure that every part of the building could be reached by a length of not more than 30 metres of hose reel tubing.

Note 20: *According to FSD, normal coverage area for one sprinkler head is 12 square metres.*

Note 21: *According to FSD, call points shall be provided at each hose reel point and adjacent to all storey exits within a distance of not more than 2 metres and adjacent to all staircase exits to open air on ground storey or place of ultimate safety.*

Follow-up actions on fire safety directions issued by the Fire Services Department

3.9 According to FSD, to assist the industries to understand the applicable standards, it had implemented measures including:

- (a) publishing circular letters to announce the adoption of new or revised standards, requirements and procedures, and to introduce checklists and guidelines; and
- (b) organising seminars regularly (under the name “FSD Connects with the Industries”) since 2017 to share and exchange views and experience with the industries, professional bodies or institutions and relevant departments on the latest fire safety requirements in relation to preparation and submission of layout plans, acceptance inspections, maintenance of FSI and other fire safety matters.

Audit noted that FSD held a seminar for the industries to introduce the submission of layout plans submitted for TIBs under FS(IB)O in October 2023 and posted the presentation materials in its website for reference. In view of the high rejection rate of layout plans at 94% in 2024, Audit considers that FSD needs to analyse the common reasons for rejecting layout plans submitted for TIBs under FS(IB)O (see para. 3.8) and make continued efforts in assisting the industries to have a better understanding on the applicable FSI code with a view to improving the quality of submitted layout plans.

Audit recommendations

3.10 **Audit has *recommended* that the Director of Fire Services should:**

- (a) **keep in view the progress of provision or improvement of FSI by owners and make continued efforts in offering necessary assistance to owners where appropriate;**
- (b) **analyse the common reasons for rejecting layout plans submitted for TIBs under FS(IB)O; and**
- (c) **make continued efforts in assisting the industries to have a better understanding on the applicable FSI code with a view to improving the quality of submitted layout plans.**

Response from the Government

3.11 The Director of Fire Services agrees with the audit recommendations. He has said that FSD:

- (a) will continue to closely monitor the progress of FSI provision and improvement in all TIBs. To provide further support to owners and occupiers of old buildings, in December 2023, FSD established the Building Improvement Support Centre offering them one-stop and all-round support services at every stage, starting from the receipt of FSDns under the relevant legislations by owners and occupiers, until the works are completed and the statutory requirements are complied with. FSD will continue to implement measures with a view to facilitating the compliance with relevant statutory requirements by owners and occupiers;
- (b) has systematically analysed the common reasons for rejecting layout plans submitted for TIBs under FS(IB)O;
- (c) arranges seminars/sharing sessions from time to time with relevant stakeholders to facilitate them in meeting relevant standards of fire safety design and foster swift processing of layout plans, etc. To further enhance the industry's understanding of the applicable FSI code and improve the overall quality of submitted layout plans, a seminar will be held in the first quarter of 2026; and
- (d) has put in place a reorganisation within its Fire Safety Command in the third quarter of 2025, involving the assignment of dedicated teams to undertake the work in connection with layout plan processing and FSI acceptance inspections, etc. This measure can help foster closer communication and sharing of examples of successful/unsuccessful cases with the industry, facilitating them in meeting the required standards when submitting the layout plans.

Administration of fire safety directions

Room for improvement in performing periodic progress checks

3.12 According to CPI(FP):

Follow-up actions on fire safety directions issued by the Fire Services Department

- (a) after the issuance of FSDns, FSD performs periodic progress checks normally on a half-yearly basis (i.e. at interim and upon expiry). For FSDns only directing the occupiers to provide emergency lighting inside individual units, periodic progress checks will be performed in the third and the sixth month after issuance;
- (b) the responsible inspection officers should report the findings of the checks as far as possible within 10 working days after the periodic progress checks; and
- (c) if no significant progress is noted during a periodic progress check, a reminder letter or a post-warning letter (upon expiry of an FSDn) will be issued to the relevant owner/occupier.

3.13 According to FSD, it usually performs a periodic progress check for multiple FSDns relating to common parts of a TIB in one go. Audit sample examination of FSD's half-yearly periodic progress checks performed for 20 TIBs (involving 1,636 FSDns issued in or before 2023) in 2024 revealed the following:

- (a) ***No documentary evidence showing that periodic progress checks had been performed at the frequency stipulated in CPI(FP).*** There was no documentary evidence showing that periodic progress checks had been performed by FSD at interim for all the 20 TIBs and upon expiry of FSDns for 8 TIBs;
- (b) ***Timeframe not stipulated in CPI(FP) to perform periodic progress checks.*** For the 12 TIBs with periodic progress checks performed upon expiry, while there was no timeframe stipulated in CPI(FP) to perform periodic progress checks, FSD performed the checks 1 day to 57 days (averaging 19 days) before expiry of the relevant FSDns for 6 (50%) TIBs and 11 to 89 days (averaging 33 days) after expiry of the relevant FSDns for the other 6 (50%) TIBs;
- (c) ***Inspections not reported in a timely manner.*** Of the 12 TIBs with periodic progress checks performed upon expiry:
 - (i) for 5 (42%) TIBs, inspection officers reported the findings within 10 working days after the checks; and

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- (ii) for the remaining 7 (58%) TIBs, inspection officers took 14 to 73 working days (averaging 36 working days) to report the findings; and
- (d) ***Timeframe not stipulated in CPI(FP) to issue post-warning letters.*** After the periodic progress checks of the 12 TIBs, no significant progress was noted by FSD in 3 TIBs and thus, post-warning letters were issued to the owners (involving 124 FSDns). While there was no timeframe stipulated in CPI(FP) to issue post-warning letters, FSD took 50 to 63 days (averaging 58 days) after expiry of the relevant FSDns to issue the post-warning letters.

3.14 For FSDns only directing the occupiers to provide emergency lighting (i.e. the only item in the FSDns), Audit sample examination of FSD's periodic progress checks performed for 105 FSDns (involving individual units in 10 TIBs) which were remained in force as at 30 June 2025 revealed the following:

- (a) ***No documentary evidence showing that periodic progress checks had been performed in the third month after issuance of FSDns.*** For all the 105 FSDns, while FSD performed periodic progress checks upon their initial expiry dates (i.e. in the sixth month), there was no documentary evidence showing that periodic progress checks had been performed by FSD in the third month after their issuance;
- (b) ***Timeframe not stipulated in CPI(FP) to perform periodic progress checks.*** While there was no timeframe stipulated in CPI(FP) to perform periodic progress checks, FSD performed the checks 6 to 120 days (averaging 40 days) after expiry of the 105 FSDns;
- (c) ***Inspections not reported in a timely manner.*** Of the 105 FSDns with periodic progress checks performed upon expiry:
 - (i) for 31 (30%) FSDns, inspection officers reported the findings within 10 working days after the checks; and
 - (ii) for 74 (70%) FSDns, inspection officers reported the findings 19 to 94 working days (averaging 60 working days) after the checks; and

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- (d) *Timeframe not stipulated in CPI(FP) to issue post-warning letters.* After the periodic progress checks of the 105 FSDns, no significant progress was noted by FSD for 1 FSDn and thus, a post-warning letter was issued to the occupier. While there was no timeframe stipulated in CPI(FP) to issue warning letters, FSD took 21 days after expiry of the FSDn to issue the post-warning letter.

3.15 Upon enquiry, FSD informed Audit in October 2025 that:

- (a) of the 20 TIBs mentioned in paragraph 3.13(a), periodic progress checks had been carried out during the inspections of individual units (i.e. periodic progress checks for FSDns only directing the occupiers to provide emergency lighting — see para. 3.12(a)) or through telephone contacts with the responsible persons (e.g. owners, owners' corporations, registered building professionals and RFSICs) of the TIBs. On-site inspections might not be immediately necessary taking into account the following:
 - (i) during the inspections of individual units, FSD inspected building entrances, lift lobbies, common corridors and staircases of TIBs;
 - (ii) almost all TIBs with FSDns issued were in the early stage of coordination and improvement works had not commenced (see para. 3.4(a) to (c)); and
 - (iii) through proactive outreach by contacting the responsible persons, inspection officers could monitor the progress and provide advice to facilitate the improvement works;
- (b) regarding the periodic progress checks for FSDns only directing the occupiers to provide emergency lighting mentioned in paragraph 3.14(a), having reviewed its procedures, FSD considered that the periodic progress checks in the third month was not necessary for simple works such as installation of emergency lighting. Periodic progress checks would be conducted only upon expiry of the FSDns and the requirement would be amended in CPI(FP); and
- (c) regarding the long time taken to report the findings of periodic progress checks mentioned in paragraphs 3.13(c)(ii) and 3.14(c)(ii), additional time

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was required for FSD to have thorough communication with the responsible persons and collect supporting documents to ascertain if positive actions had been taken for approval of EoT.

3.16 In Audit's view, in order to keep track of the progress of TIB's improvement works, FSD needs to:

- (a) maintain proper records on the periodic progress checks conducted;
- (b) maintain the timeliness of reporting the findings of periodic progress checks in accordance with CPI(FP); and
- (c) stipulate the timeframes of performing periodic progress checks and issuing post-warning letters in CPI(FP).

Room for improvement in issuing certificates of compliance

3.17 Upon completion of the fire safety improvement works for an FSDn, the owner or occupier may, by written notice (Note 22) given by delivering it personally or sending it by post to the enforcement authority, request the authority to issue a certificate of compliance. According to CPI(FP), an inspection officer will arrange an acceptance inspection to be carried out within 15 working days after receiving a notification from an owner/occupier and report to his supervisor within 10 working days after acceptance inspection. According to FS(IB)O, if the enforcement authority is satisfied that the requirements or measures specified in an FSDn have been complied with, it should issue a certificate of compliance to the owner or occupier concerned as soon as practicable.

3.18 During the period from 1 July to 31 December 2024, FSD carried out acceptance inspections and concluded that the results were satisfactory for 882 FSDns. Audit examination of these 882 FSDns revealed that:

Note 22: *The notice is usually prepared and submitted to FSD by the appointed RFSICs as the Fire Service (Installations and Equipment) Regulations require them to issue a certificate to the person who has instructed him to undertake the work and forward a copy thereof to FSD, within 14 days after completion of his work.*

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- (a) *Acceptance inspections not carried out in a timely manner.* For 61 (7% of 882) FSDns, FSD carried out acceptance inspections more than 15 working days after receiving relevant notifications, ranging from 17 to 95 working days; and
 - (b) *Certificates of compliance not issued in a timely manner.* While timeframe was not set in CPI(FP) for the issuance of certificate of compliance, some certificates of compliance were not issued in a timely manner (i.e. over 30 days after the acceptance inspection), as follows:
 - (i) for 382 (43% of 882) FSDns, the certificates of compliance were issued 31 to 90 days after the relevant acceptance inspections; and
 - (ii) for 291 (33% of 882) FSDns, the certificates of compliance were issued more than 90 days after the relevant acceptance inspections, ranging from 91 to 274 days.
- 3.19 Upon enquiry, FSD informed Audit in October 2025 that:
- (a) there were practical challenges in scheduling acceptance inspections with occupiers, especially when a single TIB involved a high volume of FSDns. Moreover, in some cases, more than one acceptance inspection was conducted since additional emergency lighting was required after assessment by FSD;
 - (b) the number of working days mentioned in paragraph 3.18(a) represented the period between the dates of notifications received and the last acceptance inspections conducted. The inspections conducted during 1 July to 31 December 2024, other than the last inspections, were not documented; and
 - (c) all occupiers had been duly informed of the result of acceptance inspection on site upon completion of inspection. Since early 2025, FSD had implemented a clear timeframe requiring the certificates of compliance to be issued within two months after a passed acceptance inspection. Such measure was considered effective. According to its records, the average time taken to issue certificates of compliance was 27 days during the period from 1 April to 30 September 2025, well within the 2-month timeframe.

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3.20 In Audit's view, FSD needs to carry out acceptance inspections in accordance with the timeframe stipulated in CPI(FP) as far as practicable and maintain proper records on the acceptance inspections conducted. Moreover, FSD needs to stipulate the 2-month timeframe in CPI(FP) for the issuance of certificates of compliance.

Need to remind inspection officers to be cautious when preparing FSDns

3.21 As at 30 June 2025, 1,085 of the 17,727 issued FSDns had been withdrawn (see para. 3.3(a)(ii)). Audit sample checked 480 withdrawn FSDns for the reasons of withdrawal and noted that:

- (a) 225 (47%) FSDns were withdrawn due to change of owners or occupiers (Note 23), or the concerned units were found vacant;
- (b) 167 (35%) FSDns were withdrawn due to typographical errors on the FSDns, including the addresses of the concerned units, the expiry dates, the fire safety requirements and the correspondence addresses of the owners; and
- (c) 88 (18%) FSDns were withdrawn due to the conversion of two TIBs into commercial use and the demolition of a TIB.

3.22 In Audit's view, as incorrect details of FSDns in paragraph 3.21(b) might necessitate withdrawal and issuance of new FSDns thereby deferring the implementation of fire safety improvement works, FSD needs to remind inspection officers to be cautious when preparing FSDns.

Note 23: *According to CPI(FP), in case the ownership/occupancy changed or the subject premises/units became vacant, the original FSDn should be withdrawn/discharged and a fresh FSDn should then be issued to the subsequent owner/occupier where appropriate.*

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Need to consider stipulating timeframe for processing EoT applications

3.23 If the relevant owners or occupiers cannot complete the fire safety improvement works within the time limit specified on FSDns issued by FSD, they may apply in writing to FSD for EoT. According to FSD, it approves EoT applications on a case-by-case basis. Supporting documents for the work progress (e.g. minutes of meetings of the owners' corporation, tender documents, works schedule or evidence of works commencement) should be provided by the owners or occupiers for the applications. In general, EoT for one year (and 6 months for FSDns only directing the occupiers to provide emergency lighting) will be granted and the owners or occupiers need to apply to FSD again for further EoT. Table 4 shows the analysis of the 7,109 FSDns issued by FSD with EoT granted and remained in force as at 30 June 2025.

Table 4
FSDns with EoT granted and remained in force
(30 June 2025)

Year of issuance	Number of FSDns		
	for fire safety requirements involving common parts issued to owners	for fire safety requirements inside individual units issued to occupiers	Total
2021	750	10	760 (10%)
2022	1,750	12	1,762 (25%)
2023	3,578	30	3,608 (51%)
2024	920	59	979 (14%)
Total	6,998	111	7,109 (100%)

Source: *Audit analysis of FSD records*

3.24 In 2024, FSD received 156 applications (involving 5,326 FSDns) for EoT, of which 145 (93%) were approved, and 11 (7%) were rejected due to no significant

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progress of the improvement works. Audit sample check of 25 approved applications (involving 1,840 FSDns) revealed that FSD:

- (a) had obtained supporting documents and documented the justifications to approve all the 25 applications; and
- (b) took 1 to 122 days (averaging 42 days) to approve and send out the EoT approval letters.

3.25 In Audit's view, in order to facilitate the progress of fire safety improvement works, FSD needs to consider stipulating timeframe for processing and sending out EoT approval/rejection letters in CPI(FP).

Audit recommendations

3.26 **Audit has recommended that the Director of Fire Services should:**

- (a) **maintain proper records on the periodic progress checks conducted;**
- (b) **maintain the timeliness of reporting the findings of periodic progress checks in accordance with CPI(FP);**
- (c) **stipulate the timeframes of performing periodic progress checks and issuing post-warning letters in CPI(FP);**
- (d) **carry out acceptance inspections in accordance with the timeframe stipulated in CPI(FP) as far as practicable and maintain proper records on the acceptance inspections conducted;**
- (e) **stipulate the 2-month timeframe in CPI(FP) for the issuance of certificates of compliance;**
- (f) **remind inspection officers to be cautious when preparing FSDns; and**
- (g) **consider stipulating timeframe for processing and sending out EoT approval/rejection letters in CPI(FP).**

Response from the Government

3.27 The Director of Fire Services agrees with the audit recommendations. He has said that:

- (a) in order to maintain proper records on the periodic progress checks conducted and the timeliness of reporting the findings, an instruction has been given in October 2025 to all responsible staff on maintaining comprehensive records of all periodic progress checks within 20 working days in the Building Fire Safety Database and File Management System, which facilitates the monitoring of file processing and movement. The aforesaid timeframe will be reflected in CPI(FP) in the fourth quarter of 2025;
- (b) FSD has stipulated the following timeframes of performing periodic progress checks and issuing post-warning letters, which will be reflected in CPI(FP) in the fourth quarter of 2025:
 - (i) for cases involving owners, fire safety requirements for owners' compliance generally involve more complex fire safety improvement works (see para. 1.7). Periodic progress checks will accordingly be conducted by FSD on a half-yearly basis before fire safety improvement works commence, and on a quarterly basis after commencement of the works;
 - (ii) for cases involving occupiers, the fire safety requirements for their compliance generally involve less complex works (e.g. involving installation of emergency lighting — see Note 3 to para. 1.7). According to experience, those requirements can generally be complied with before expiry of the FSDns. An inspection will accordingly be conducted by FSD within 20 working days after the FSDn expires; and
 - (iii) for all non-compliant cases, a post-warning letter will be issued within 40 working days after the expiry of the FSDn;
- (c) FSD will carry out acceptance inspections in accordance with the timeframe stipulated in CPI(FP) as far as practicable and maintain proper records accordingly;

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- (d) since early 2025, FSD has stipulated that certificates of compliance are to be issued within two months after a passed acceptance inspection. Since implementation, the average issuance time has remained well within this 2-month timeframe. The aforesaid timeframe will be reflected in CPI(FP) in the fourth quarter of 2025;
- (e) FSD has been taking proactive measures to minimise manual entry errors. To this end, FSD is enhancing its system to allow direct integration of address data. This enhancement is targeted for implementation in the first quarter of 2026; and
- (f) FSD has stipulated a timeframe in connection with the processing of EoT applications, which requires that, upon receipt of an EoT application, the EoT approval/rejection letters will be issued within 35 working days. The aforesaid timeframe will be reflected in CPI(FP) in the fourth quarter of 2025.

Prosecution actions

3.28 According to FS(IB)O:

- (a) an owner or occupier who, without reasonable excuse, fails to comply with an FSDn commits an offence, and is liable on conviction to a fine at level 4 (i.e. \$25,000 as at 30 June 2025) and a further fine of \$2,500 for each day during which the failure continues after the expiry of the time limit for complying with the FSDn. The magistrate may make an FSCO to replace the FSDn; and
- (b) a prosecution for an offence may only be started before the end of 12 months beginning on the date on which the offence is discovered by, or comes to the notice of, the enforcement authority.

3.29 As at 30 June 2025, there were 887 FSDns issued by FSD with compliance period expired and works remained outstanding (see para. 3.3(b)(iii)). As shown in Table 5, Audit analysed the 887 FSDns and noted that the compliance period of 113 (13%) FSDns had expired for more than 1 year.

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Table 5

**Ageing analysis of FSDns issued by FSD
with compliance period expired and works remained outstanding
(30 June 2025)**

Time elapsed	Number of FSDns		
	for fire safety requirement involving common parts issued to owners	for fire safety requirement inside individual units issued to occupiers	Total
180 days or less	497	238	735 (83%)
More than 180 to 365 days	26	13	39 (4%)
More than 1 to 2 years	73	18	91 (10%)
More than 2 years (Note)	9	13	22 (3%)
Total	605	282	887 (100%)

} 113
(13%)

Source: Audit analysis of FSD records

Note: The longest time elapsed was 2.5 years.

Remarks: Time elapsed was counted from the end of the initial compliance period or extended compliance period (if any).

Room for improvement in prosecution actions

3.30 Of the 113 FSDns for which compliance period had expired for more than 1 year and works remained outstanding as at 30 June 2025, there were 119 owners/occupiers (Note 24) involved. Audit examination of FSD's records revealed that:

- (a) for 70 (59%) cases, prosecution was in progress or completed. For 62 cases, the hearings were scheduled to late 2025. For the remaining 8 cases, the owners were convicted but not issued with FSCOs as they were declared bankrupt;

Note 24: *Among the 113 FSDns, 6 involved units were co-owned by 2 owners.*

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- (b) for 25 (21%) cases, the occupiers could not be located during FSD's periodic progress checks;
- (c) for 12 (10%) cases, FSD concluded not to instigate prosecution as changes of owners/occupiers were noted;
- (d) for 7 (6%) cases, FSD concluded not to instigate prosecution as positive progress of fire safety improvement works was noted; and
- (e) for 5 (4%) cases, the summonses could not be delivered to the defendants.

3.31 Upon enquiry, FSD informed Audit in July and September 2025 that:

- (a) in respect of paragraph 3.30(b), it had been persisting in conducting inspections at various time slots during periodic progress checks and notifications were left in the mailbox of the locked units. In addition, it would seek assistance from the management offices, owners' corporation, or unit owners to obtain updated contact information for the occupiers to facilitate further inspections. If there was evidence that the occupiers had moved out, the concerned FSDns would be discharged and the fire safety requirement would be enforced as stipulated in the FSDns issued to the owners of the relevant units; and
- (b) in respect of paragraph 3.30(e), it would keep in view the delivery of summonses and make greater efforts in collecting necessary information for laying the summonses.

3.32 In Audit's view, FSD needs to:

- (a) step up efforts in locating the owners/occupiers and ascertaining the progress of fire safety improvement works in locked units; and
- (b) make greater efforts in delivering summonses to defendants.

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Need to review administrative procedures in registering FSCOs against the land register

3.33 Since the implementation of FS(IB)O in 2020 and up to 30 June 2025, prosecution actions had been completed for 78 FSDns issued by FSD and all the concerned owners/occupiers had been convicted with fines totalling \$156,297 (ranging from \$597 to \$12,461 per defendant). Among these 78 FSDns, 70 FSDns were replaced by 73 FSCOs issued by the magistrates (Note 25) and the remaining 8 FSDns were not replaced by FSCOs as the concerned owners were declared bankrupt (see para. 3.30(a)). Pursuant to FS(IB)O:

- (a) an enforcement authority (i.e. FSD or BD) may cause an FSCO to be registered by memorial in the Land Registry against the land register of the respective buildings or part of a building; and
- (b) if an enforcement authority is required to cause an FSCO to be registered, the authority must, as soon as practicable within one month beginning on the date of the FSCO, cause it to be registered.

3.34 Audit analysis of FSD records on the registration of the 72 FSCOs (excluding the one issued to an occupier) revealed that it took 50 to 193 days (averaging 96 days) to register the FSCOs against the land register. Upon enquiry, FSD informed Audit in October 2025 that it took time to perform administrative procedures before registering the FSCOs against the land register. In Audit's view, FSD needs to review its administrative procedures with a view to registering FSCOs against the land register of the respective buildings or part of a building in accordance with FS(IB)O in a timely manner.

Note 25: *Among the 70 FSDn replaced by FSCOs, 3 involved units were co-owned by 2 owners who were both convicted and issued with FSCOs. As at 30 June 2025, 1 FSCO issued to the occupier had been complied with and the compliance period of 1 FSCO had been extended beyond 30 June 2025. For the remaining 71 FSCOs, the expiry dates were after 30 June 2025.*

Audit recommendations

- 3.35 **Audit has *recommended* that the Director of Fire Services should:**
- (a) **step up efforts in locating the owners/occupiers and ascertaining the progress of fire safety improvement works in locked units;**
 - (b) **make greater efforts in delivering summonses to defendants; and**
 - (c) **review FSD's administrative procedures with a view to registering FSCOs against the land register of the respective buildings or part of a building in accordance with FS(IB)O in a timely manner.**

Response from the Government

3.36 The Director of Fire Services agrees with the audit recommendations. He has said that FSD:

- (a) will step up its efforts to locate owners and occupiers of persistently locked units upon the expiry of the FSDns and ascertain the status of the fire safety improvement works, through collaborating with owners' corporations and management companies to obtain up-to-date tenancy information;
- (b) will maintain closer liaison with the relevant departments/authorities to monitor the delivery of summonses; and
- (c) has conducted a review of the administrative procedures for registering FSCOs, and will streamline the process with a view to expediting the registration of FSCOs against the land register of the respective buildings or part of a building in accordance with FS(IB)O in a timely manner.

Publishing information

Need to update the information of FSDns and FSCOs in the designated website on a timely basis

3.37 According to CPI(FP), in order to enable the public (including the prospective buyers of units in TIBs) to obtain the relevant information and enhance their awareness of the outstanding legal liabilities (if any) of the TIBs, the following information of FSDns and FSCOs will be published in a designated website in accordance with FS(IB)O:

- (a) the serial number of FSDn or FSCO;
- (b) the address of the building or part of it;
- (c) the date of FSDn or FSCO; and
- (d) the compliance status of FSDn or FSCO.

3.38 Audit visited the designated website on 5 September 2025 and noted that:

- (a) among the 420 FSDns (involving 25 TIBs) issued in July and August 2025, the information of 144 (34%) FSDns (involving 3 TIBs) had not been published in the website; and
- (b) among the 72 FSCOs with expiry dates after 30 June 2025 (see Note 25 to para. 3.33), the information of 1 (1%) FSCO had not been published in the website, and that of the other 71 (99%) FSCOs were wrongly shown as FSDns which had different legal liabilities.

In Audit's view, FSD needs to take measures to update the information of FSDns and FSCOs in the designated website on a timely basis.

Audit recommendation

3.39 **Audit has *recommended* that the Director of Fire Services should take measures to update the information of FSDns and FSCOs in the designated website on a timely basis.**

Response from the Government

3.40 The Director of Fire Services agrees with the audit recommendation. He has said that FSD:

- (a) has taken immediate actions to update the information of FSDns in the designated website; and

- (b) is currently enhancing the relevant system to ensure that information regarding FSCOs can be accurately updated in a timely manner, thereby improving transparency for public information. The target completion date is the first quarter of 2026. FSD will sustain its efforts in taking measures to update the information of FSDns and FSCOs in the designated website on a timely basis.

PART 4: FOLLOW-UP ACTIONS ON FIRE SAFETY DIRECTIONS ISSUED BY THE BUILDINGS DEPARTMENT

4.1 This PART examines BD's work in taking follow-up actions on FSDns, focusing on:

- (a) administration of FSDns (paras. 4.5 to 4.24);
- (b) prosecution actions (paras. 4.25 to 4.34); and
- (c) facilitation measures for TIB owners (paras. 4.35 to 4.39).

4.2 According to BD, after receiving FSDns, owners should take the initiative to complete the required works to comply with FSDns within the specified time limit (1 year for common parts and 6 months for individual units in general). On completion of improvement works, owners should inform BD and submit copies of certificates/test reports/assessment reports for fire rated doors, fixed lights and fire rated enclosure, etc.

4.3 BD assigns case officers to follow up on cases of individual TIBs and provide technical advice and assistance. Where necessary, BD staff will attend owners' meetings/owners' corporations' meetings and seminars to explain to the owners the requirements of the improvement works and the assistance available to them. When owners notify BD of works completion or submit certificates/test reports to BD, relevant case officers will arrange compliance inspections. Compliance letters will be issued to owners if the fire safety improvement works are considered acceptable.

4.4 BD uses a computerised system, namely the Building Condition Information System (BCIS), to manage and maintain information on existing buildings in the territory. According to FSSM, relevant case data (such as inspection date, FSDn issuance/expiry dates, EoT granted, compliance, etc.) are required to be entered into BCIS on a timely basis to facilitate the monitoring of work progress of FSDns.

**Follow-up actions on fire safety directions
issued by the Buildings Department**

According to BCIS records, in the period from 2021 (Note 26) to 2025 (up to June 2025), BD has issued 6,566 FSDns to owners of TIBs. As at 30 June 2025, 555 (8%) FSDns were required to be completed within the initial compliance period while 587 (9%) FSDns were granted EoT extending the compliance period. Table 6 shows the status of these FSDns as at 30 June 2025.

Table 6
Status of FSDns issued by BD
(30 June 2025)

Status	Number of FSDns		
	for fire safety requirements for common parts issued to owners	for fire safety requirements for individual units issued to owners	Total
<i>Ceased to be in force</i>			
Complied with	0	879	879 (13%)
Withdrawn	4	166	170 (3%)
Subtotal (a)	4	1,045	1,049 (16%)
<i>Remained in force with outstanding improvement works</i>			
Compliance period not yet expired			
- Without EoT	56	499	555 (8%)
- With EoT	55	532	587 (9%)
	111	1,031	1,142 (17%)
Compliance period expired	120	4,255	4,375 (67%)
Subtotal (b)	231	5,286	5,517 (84%)
Total (c)=(a)+(b)	235	6,331	6,566 (100%)

Source: Audit analysis of BD records

Note 26: According to BD, its first FSDn under FS(IB)O was issued in March 2021.

Administration of fire safety directions

Room for improvement in arranging compliance inspections

4.5 According to FSSM, when owners notify BD of works completion or submit certificates/test reports to BD, relevant case officers should arrange compliance inspections within 28 days. The inspection report on the compliance status of FSDn including recommendations such as issuing compliance letter, warning letter or reminder for the outstanding works/documents, should be prepared for endorsement by the Senior Building Surveyor not later than two months after the compliance inspection. Audit analysis of BCIS records from 2021 to 2025 (up to June 2025) revealed that:

- (a) information on the dates of notification of works completion by owners were not captured in BCIS. As a result, Audit was unable to ascertain whether the 28-day time limit of arranging compliance inspection was complied with; and
- (b) as regards the 2-month time limit of submitting inspection reports for endorsement by the Senior Building Surveyor, by comparing the dates of compliance inspection with the dates of issuing compliance letter (Note 27) for the 879 compliant FSDns as at 30 June 2025:
 - (i) for 242 (27%) FSDns, compliance letters were issued within two months after the compliance inspections;
 - (ii) for 263 (30%) FSDns, compliance letters were issued two months after the compliance inspections, with delays ranging from 1 day to 451 days, averaging 70 days; and
 - (iii) for 374 (43%) FSDns, the relevant information was not captured in BCIS. Upon enquiry, BD provided Audit with a list showing the dates of compliance inspection for these 374 FSDns, of which compliance letters were issued two months after the compliance

Note 27: *As the dates of endorsement of inspection report were not captured in BCIS, the dates of issuing compliance letters were used in this analysis as according to BD, compliance letters would be issued shortly after the endorsement of relevant inspection reports, with a lapse of a couple of days.*

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inspections for 202 (23 % of 879) FSDns, with delays ranging from 1 day to 280 days, averaging 80 days.

- 4.6 In September and October 2025, BD informed Audit that:
- (a) regarding paragraph 4.5(a), only written notifications of completion from owners or their representatives were kept in the case files and captured in BCIS but in a section other than “report completion date” section. According to current practice, for notifications of completion received verbally, BD staff would capture the information in a data sheet filed in a shared platform (but not in BCIS) for the arrangement of appropriate actions and progress monitoring. For upcoming notifications of completion (both written and verbal), TIB Unit would input the information into “notification of completion date” section in BCIS;
 - (b) more time might be needed for arranging compliance inspections and issuing compliance letters due to the following reasons:
 - (i) owners or their representatives, the consultants or the contractors were invited to join the compliance inspections so that they would be notified of the defects or non-compliant items immediately on site. With such practice, it was common that an immediate inspection could not be arranged until a mutually agreed date among all parties;
 - (ii) compliance inspections would be arranged if both the required improvement works and necessary documents were in order. However, some of the improvement works or essential certificates/test reports for fire-rated materials were often incomplete. In these circumstances, the owners/consultants/contractors would be required to follow up the outstanding matters and notify BD of the completion again to reschedule the compliance inspection;
 - (iii) for cases where only minor defects were identified during compliance inspections and the owners/consultants/contractors undertook to follow up promptly, BD might allow reasonable time for rectification. Upon completion of the required rectification

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works, compliance reports would be prepared and compliance letters would be issued accordingly; and

- (iv) BCIS did not have a section to capture the information on the dates of issuing reply letters for non-compliant/partially complied cases and thus the period for owners to rectify the defects were also included in the time for issuing compliance letters; and
- (c) with a view to improving the efficiency of work and for better case management, BD had explored the feasibility of making use of technology in 2023. One of the enhancement was setting up a new platform, namely the “Case Management and Reporting Platform”, for owners to check case status and notify BD of completion of works. Such new platform was under development and would be implemented by December 2025.

4.7 In Audit’s view, BD needs to:

- (a) remind case officers to enter the required case data in BCIS for monitoring the compliance with the stipulated time limits in arranging compliance inspections and submitting inspection reports to the Senior Building Surveyor for endorsement;
- (b) remind case officers to expedite the submission of inspection reports for endorsement by the Senior Building Surveyor so as to comply with the 2-month time limit as far as practicable; and
- (c) keep in view the development of the new platform and make use of it to improve the case management.

Room for improvement in superseding FSDns

4.8 BD adopts a flexible and pragmatic approach in handling each FSDn. If the owners face genuine difficulties such as structural, spatial or technical constraints, alternative measures may also be accepted provided that fire safety is not compromised. BD may withdraw an FSDn when an alternative measure is accepted. Audit analysis of BCIS records revealed that as at 30 June 2025, of the 170 FSDns withdrawn:

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- (a) 36 (21%) FSDns were withdrawn as there were acceptable alternative measures for meeting fire safety requirements which were agreed by BD; and
- (b) 134 (79%) FSDns were withdrawn and superseded by new FSDns. Audit noted that for FSDns superseded, the compliance period for the owners to carry out fire safety improvement works would be counted from the date of issuance of the new FSDns. Upon enquiry, in August 2025, BD informed Audit that of the 134 superseded FSDns:
 - (i) 77 (58%) FSDns were superseded due to change of content;
 - (ii) 47 (35%) FSDns were superseded due to change of ownership; and
 - (iii) 10 (7%) FSDns were superseded due to both change of content and change of ownership.

4.9 Regarding the 77 FSDns superseded due to change of content (see para. 4.8(b)(i)), Audit noted that:

- (a) 8 FSDns issued in March 2021 relating to a TIB (the second TIB inspected under Phase 1 after the implementation of FS(IB)O in 2020) were superseded twice (i.e. 16 FSDns were superseded) with details as follows:
 - (i) the first time took place 1 month later (i.e. April 2021) due to textual errors in the description of the requirements; and
 - (ii) the second time took place more than 3 years later (i.e. June 2024) due to change in site conditions revealed during a compliance inspection conducted in June 2024; and
- (b) 27 FSDns were superseded after expiry of the initial compliance periods, with a time lapse ranging from 104 to 986 days, averaging 493 days.

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4.10 In response to the enquiry about the reasons for superseding FSDns, in October 2025, BD informed Audit that:

- (a) for the 77 superseded FSDns due to change of content, some were due to change of site conditions/layouts revealed during compliance inspections. After reassessment of the updated site conditions, different fire safety improvements were required to be imposed accordingly. Hence, the superseding FSDns for these kinds of cases had to be issued. The remaining superseded FSDns were due to application of pragmatic approach (see para. 4.8) and minor typographical/textual errors; and
- (b) in particular, regarding the 27 FSDns mentioned in paragraph 4.9(b), upon discovery of updated site conditions, reasonable processing time was required for the follow-up action, e.g. checking updated ownership, preparation of inspection report, etc. Out of the 27 FSDns, 19 FSDns were superseded within 2 to 175 days after the discovery of updated site conditions during the compliance inspections. The remaining 8 FSDns (involving 1 TIB) were superseded due to typographical errors 49 days after discovering the error.

In Audit's view, with a view to minimising the need of superseding FSDns due to typographical/textual errors, BD needs to remind case officers to be cautious when preparing FSDns.

Need to update FSSM for requirements in granting EoT

4.11 According to FSSM, upon receipt of requests asking for EoT to comply with the FSDns, BD staff should carefully consider the merits of each individual case. Considerations of granting EoT should be based on relevant, reasonable and substantiated grounds (e.g. documentary proof such as meeting notes of owners' corporation, tender documents, reasonable progress of works, temporary health problems, applications for financial assistance, etc.). As BD has pledged to be flexible and pragmatic, the granting of EoT may be considered as an encouragement to the owners to complete the upgrading works as specified in FSDns.

4.12 According to BCIS records, in the period from 2021 to 2025 (up to June 2025), EoT had been granted to 3,112 FSDns. As at 30 June 2025, the extended compliance period of 587 (19% of 3,112) FSDns had not yet expired,

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44 (7% of 587) FSDns were initially issued in 2021 requiring compliance within 6 to 12 months (the compliance period of the longest cases had been extended for 3.7 years). Audit scrutiny of case files found discrepancies with the requirements in FSSM in granting EoT. For example:

- (a) for 1 FSDn, an EoT application for three months was approved in December 2024 without additional documentary proof except the application letter with justifications submitted in November 2024; and
- (b) for another FSDn with 8 EoT applications approved from March 2023 to August 2025, while 5 EoT applications were supported by copy of quotations of construction works, only application letters with justifications were submitted without any additional documentary proof for the remaining 3 EoT applications.

4.13 Regarding the documentary proof requirements, upon enquiry, BD informed Audit in July and October 2025 that:

- (a) to encourage owners to complete the fire safety improvement works, BD had reviewed the requirements and considered that, in general, a written application with reasonable justifications was a sufficient form of supporting documentation for granting EoT; and
- (b) additional documentary proof might be required if considered necessary (e.g. justifications on reasonable progress of work for repeated applications).

Audit considers that BD needs to update FSSM to reflect the prevailing practice on the requirement for additional documentary proof in granting EoT.

Room for improvement in monitoring outstanding FSDns

4.14 As shown in Table 6 in paragraph 4.4, as at 30 June 2025, there were 4,375 FSDns of which the compliance periods were expired and works remained outstanding. Audit analysis of these outstanding FSDns revealed that the compliance period of 145 (3%) FSDns had expired for more than three years (see Table 7).

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Table 7

**Ageing analysis of FSDns issued by BD with compliance period expired
and works remained outstanding
(30 June 2025)**

Time elapsed	Number of FSDns		
	Issued for common parts	Issued for individual units	Total
180 days or less	46	1,139	1,185 (27%)
More than 180 to 365 days	32	798	830 (19%)
More than 1 to 2 years	28	1,454	1,482 (34%)
More than 2 to 3 years	13	720	733 (17%)
More than 3 years (Note)	1	144	145 (3%)
Total	120	4,255	4,375 (100%)

Source: Audit analysis of BD records

Note: The longest time elapsed was 3.7 years. According to BD, prosecution actions relating to the FSDns (except those with positive response) were in progress as of October 2025.

Remarks: Time elapsed was counted from the end of the initial compliance period or extended compliance period (if any).

4.15 Need to update FSSM to enhance monitoring of outstanding FSDns. According to FSSM, regular progress check for the works required under FS(IB)O is important for ensuring compliance of FSDns and should be carried out in a timely manner. Furthermore, it is a good practice to maintain a dialogue with the owners after issuance of FSDns to effect compliance and to offer assistance as necessary. For cases with positive response, the case officers should liaise with owners, consultants or contractors as appropriate, to keep in view the progress of the fire safety improvement works with reference to the submitted work programme, or otherwise according to the circumstances of each case. However, Audit noted that FSSM does not stipulate the frequency and the required documentation for conducting regular progress check.

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4.16 As an illustration, in the case file of 1 TIB of which 14 FSDns were issued in January 2024 (13 FSDns for individual units for completion by July 2024 and 1 FSDn for common parts for completion by January 2025), Audit examination found that:

- (a) upon request from the owners' corporation of the TIB concerned, the case officers attended a meeting with the owners in May 2024;
- (b) upon enquiry from the authorised person of some owners, the case officers provided advice in October 2024; and
- (c) except for the correspondence relating to EoT and warning letters, there was no documentary evidence showing that regular progress checks, if any, had been conducted by the case officers up to 30 June 2025. In particular, no progress was recorded for 1 FSDn in the 18-month period since its issuance in January 2024 up to 30 June 2025.

4.17 Upon enquiry, in October 2025, BD informed Audit that:

- (a) the monitoring of progress of the required fire safety improvement works was assisted by management statistics captured in BCIS rather than documents on file. BD would adopt Audit's recommendation to enhance the collection of management statistics in BCIS (see paras. 4.5, 4.6 and 4.18) and input the milestones of the cases for a better monitoring of the progress of the required fire safety improvement works which could be achieved with the aid of management statistics in BCIS, including:
 - (i) date of EoT application and date of BD's reply;
 - (ii) date of improvement proposal submission and date of BD's reply;
 - (iii) date of notification of completion (both written and verbal) and date of compliance inspection; and
 - (iv) date of endorsement of compliance inspection report/date of compliance letters/non-compliance letters.

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Upon expiry of compliance date/extended compliance dates, BCIS would auto-generate warning letters;

- (b) while the owners had the responsibility to comply with FSDns and notify BD the completion of the improvement works, BD would strengthen the message to owners requiring them to notify BD upon completion of improvement works and facilitate the owners in making such notification through the “Case Management and Reporting Platform” (see para. 4.6(c)). Dates of notification of completion, both written and verbal, would also be input in BCIS for better monitoring (see para. 4.6(a)); and
- (c) to follow up on non-compliant FSDns, BD had formulated a risk-based approach for referring the non-compliant cases to the Fast Track Prosecution Team (FPT) of the Mandatory Building Inspection Division for taking prosecution action (see para. 4.29).

With a view to better monitoring the progress of the required fire safety improvement works, Audit considers that BD needs to update FSSM to reflect the prevailing practice on the monitoring mechanism of outstanding FSDns.

4.18 *Need to enhance collection of management statistics.* According to FSSM, relevant case data are required to be entered into BCIS to facilitate the monitoring of work progress of FSDns (see para. 4.4). However, while information on notification date for completion and positive response from owners were required to be entered into BCIS for FSDns issued for commercial buildings, domestic buildings and composite buildings, such information were not required to be entered into BCIS for FSDns issued for TIBs. Upon enquiry about the status of individual outstanding FSDns, in August 2025, after manual checking of case files and verification with the case officers concerned, BD provided Audit with an updated list showing the status of the 4,375 outstanding FSDns as at 30 June 2025 (see Table 8). Audit analysis of the updated list found that:

- (a) some owners have notified BD of the works completion, of which:
 - (i) compliance inspection was yet to be conducted for 378 (9%) FSDns, including 212 FSDns with delays in conducting compliance inspections ranging from 3 to 819 days, averaging 121 days (see paras. 4.5(a) and 4.6(b)(i) and (ii)); and

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- (ii) compliance inspections were conducted for 793 (18%) FSDns, pending the compilation of inspection reports. Of the 793 FSDns, there were delays in issuing inspection reports for 628 FSDns. The delays ranged from 4 to 991 days, averaging 245 days (see paras. 4.5(b) and 4.6(b)(iii) and (iv));

- (b) for 125 (3%) FSDns, the fire safety improvement proposals were submitted by owners. Of them, 44 were under processing and the time elapsed between the submission dates and 30 June 2025 ranged from 1 day to 98 days, averaging 22 days;

- (c) for 451 (10%) FSDns, applications for EoT were submitted and were under processing. The time elapsed between the dates of submitting applications for EoT and 30 June 2025 ranged from 1 day to 138 days, averaging 29 days;

- (d) for 311 (7%) FSDns, case officers concerned had been offering technical assistance for improvement works via phone or personal interview with the owners, consultants or contractors concerned. They were verbally contacted in the past 12 months and were considered as having positive response; and

- (e) for 2,173 (50%) FSDns, case officers concerned considered that owners concerned were without positive response.

According to FSSM, milestones have to be input and monitored through appropriate statistical means with a view to ensuring timely actions and preventing backlogging of outstanding actions. Audit considers that BD needs to enhance the collection of management statistics and generation of management reports in BCIS for better monitoring of the progress of outstanding FSDns and follow-up actions taken by BD staff.

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Table 8

**Status update of 4,375 outstanding FSDns
(30 June 2025)**

Item	Status	Number of FSDn
1	Compliance inspection conducted and pending compilation of compliance report	793 (18%)
2	EoT applications submitted and were under processing	451 (10%)
3	Owners notified BD of the works completion and pending conduct of compliance inspection	378 (9%)
4	Fire safety improvement proposals had been submitted by owners	125 (3%)
5	Demolition / wholesales conversion of TIB in progress (Note)	101 (2%)
6	Case officers considered that owners were with positive response	311 (7%)
7	Case officers considered that owners were without positive response	2,173 (50%)
8	Others	43 (1%)
Total		4,375 (100%)

Source: BD records

Note: According to BD, enforcement actions in relation to these FSDns would not be required.

Room for improvement in monitoring advisory letters issued

4.19 Unauthorised building works (UBWs) are normally handled by the two Existing Buildings Divisions (EBDs) and the Mandatory Building Inspection Sections (MBISs) (see Appendix B). Statutory orders (i.e. section 24 orders under the Buildings Ordinance) may be issued to the owners concerned requiring removal of UBWs. UBWs may be revealed by TIB Unit during inspections. According to FSSM:

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- (a) for UBWs within the scope of inspection and actionable areas of FS(IB)O and affecting the fire safety, the removal of such fire-safety-related UBWs may be included in FSDns instead of issuing separate orders to facilitate owners' works for compliance with the Buildings Ordinance as well as FS(IB)O in one go;
- (b) as regards UBWs affecting the fire safety with rectification works involving improvement which had already been subject to section 24 orders issued by EBDs/MBISs:
 - (i) TIB Unit should liaise with EBDs/MBISs for including such UBWs in FSDns. Upon issuance of FSDns by TIB Unit, EBDs/MBISs may consider withdrawing/superseding section 24 orders as appropriate; and
 - (ii) under some special cases (e.g. compliance works being arranged by owners, prosecution or appeal in progress), it may be considered more appropriate for EBDs/MBISs to continue to follow up the section 24 orders. In these cases, advisory letters reminding the owners to carry out the required fire safety improvement when dealing with the section 24 orders will be issued by TIB Unit;
- (c) for UBWs with serious fire safety implications, separate section 24 orders with a shorter compliance period and provision for default action by BD contractor to rectify the situation more promptly should be duly considered to be issued by TIB Unit; and
- (d) section 24 orders issued by TIB Unit should be handled in accordance with the relevant instructions and guidelines issued by EBDs. With a view to focusing on TIB Unit's core duty of fire safety improvement, upon clearance of all FSDns in a TIB, the outstanding section 24 orders should be referred to and handled by EBDs/MBISs.

4.20 According to BD, in the period from 2021 to 2025 (up to June 2025):

- (a) **Advisory letters.** 97 advisory letters were issued by TIB Unit in relation to fire safety improvement works for premises with section 24 orders issued by EBDs/MBISs. As at 30 June 2025, there were 79 (81%) non-compliant

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advisory letters, of which the relating section 24 orders issued by EBDs/MBISs were discharged in relation to 33 (42% of 79) advisory letters; and

- (b) *Section 24 orders.* 2 section 24 orders were issued by TIB Unit in June 2024 for removal of under-staircase structure at the final discharge of staircase without adequate fire separation. As at 30 June 2025, while the owner applied for EoT until October 2025 for 1 section 24 order, for the remaining order, the owner verbally informed that rectification works were being arranged.

4.21 As regards the follow-up actions on the advisory letters issued by TIB Unit, BD informed Audit in August 2025 that:

- (a) the improvement works in the advisory letters would be followed up by TIB Unit, which would proactively review the status of the advisory letters and the relating section 24 orders issued by EBDs/MBISs;
- (b) in case the required improvement works in the advisory letters had not been complied when the relating section 24 orders issued by EBDs/MBISs of the premises concerned were complied with, new FSDns would be issued to the owners to cover the outstanding improvement works as mentioned in the advisory letters should the special cases of section 24 orders (see para. 4.19(b)(ii)) issued by EBDs/MBISs no longer existed; and
- (c) in order to help officers in TIB Unit adhere to the procedures in the long run, such procedures would be incorporated in FSSM.

4.22 Audit noted that the relating section 24 orders issued by EBDs/MBISs of the 33 non-compliant advisory letters issued by TIB Unit were discharged (see para. 4.20(a)), and new FSDns were yet to be issued to the owners as at 30 June 2025. Audit considers that BD needs to expedite the incorporation of the procedures of follow-up actions on advisory letters in FSSM including the timely issuance of FSDns for the outstanding improvement works in the non-compliant advisory letters.

Audit recommendations

- 4.23 **Audit has *recommended* that the Director of Buildings should:**
- (a) **remind case officers to enter the required case data in BCIS for monitoring the compliance with the stipulated time limits in arranging compliance inspections and submitting inspection reports to the Senior Building Surveyor for endorsement;**
 - (b) **remind case officers to expedite the submission of inspection reports for endorsement by the Senior Building Surveyor so as to comply with the 2-month time limit as far as practicable;**
 - (c) **keep in view the development of the new platform and make use of it to improve the case management;**
 - (d) **remind case officers to be cautious when preparing FSDns with a view to minimising the need of superseding FSDns due to typographical /textual errors;**
 - (e) **update FSSM to reflect the prevailing practice on the requirement for additional documentary proof in granting EoT;**
 - (f) **update FSSM to reflect the prevailing practice on the monitoring mechanism of outstanding FSDns;**
 - (g) **enhance the collection of management statistics and generation of management reports in BCIS for better monitoring of the progress of outstanding FSDns and follow-up actions taken by BD staff; and**
 - (h) **expedite the incorporation of the procedures of follow-up actions on advisory letters in FSSM including the timely issuance of FSDns for the outstanding improvement works in the non-compliant advisory letters.**

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Response from the Government

4.24 The Director of Buildings agrees with the audit recommendations. He has said that:

- (a) regarding the audit recommendations in paragraph 4.23(e) and (h), BD has updated FSSM accordingly; and
- (b) regarding the audit recommendation in paragraph 4.23(f), BD will explore room for enhancing the effectiveness of progress check with the resources available.

Prosecution actions

4.25 As shown in paragraph 4.18(e), as at 30 June 2025, there were 2,173 outstanding FSDns of which case officers concerned considered that owners were without positive response. Audit ageing analysis of the 2,173 outstanding FSDns revealed that 87 (4% of 2,173) had been outstanding for more than three years (see Table 9).

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Table 9

**Ageing analysis of outstanding FSDns issued by BD without positive response
(30 June 2025)**

Time elapsed	Number of FSDns		
	Issued for common parts	Issued for individual units	Total
180 days or less	23	526	549 (25%)
More than 180 to 365 days	18	371	389 (18%)
More than 1 to 2 years	8	615	623 (29%)
More than 2 to 3 years	10	515	525 (24%)
More than 3 years (Note)	1	86	87 (4%)
Total	60	2,113	2,173 (100%)

Source: Audit analysis of BD records

Note: The longest time elapsed was 3.7 years. According to BD, 23 of the 87 FSDns with time elapsed for more than 3 years were referred for taking prosecution actions.

Remarks: The time elapsed was counted from the end of the initial compliance period or extended compliance period (if any).

Need to keep in view the development of the auto-generation of warning letters for non-compliant FSDns

4.26 According to FSSM, upon expiry of the compliance period and not later than three months from the expiry of FSDns or any extended time limit, warning letters should be issued for cases without positive response or submission of the required certificates/test reports from the owners (i.e. 3-month target). A warning letter should be issued to the owner(s) concerned if prosecution is to be initiated for non-compliance with an FSDn. According to BD records, from 2021 to 2025 (up to June 2025), BD issued warning letters to the owners in relation to 3,807 FSDns. In the absence of information on the date when the owner of an FSDn was considered as without positive response, Audit analysis of the periods from the end of the initial compliance period or extended compliance period (if any) to the dates of issuing warning letters revealed that:

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- (a) the issuance of the warning letters in relation to 2,529 (66%) FSDns did not meet the 3-month target. The delays ranged from 1 day to 1,239 days, averaging 137 days; and
- (b) as at 30 June 2025, no warning letters had been issued to the owners in relation to 150 FSDns of which initial/extended compliance period had been expired for three months or more and were considered as without positive response.

4.27 In September and October 2025, BD informed Audit that:

- (a) according to TIB Unit's experience, subsequent to the issuance of warning letters, there was often an influx of telephone calls from the owners, consultants, contractors or management companies, enquiring the detailed requirements for compliance with FSDns. To handle the large amount of enquiries properly and in a timely manner, TIB Unit would issue warning letters in an orderly manner according to the operational needs. As a result, some cases might slightly exceed the 3-month target. While 1,278 (34%) of the 3,807 warning letters were issued within the 3-month target, 1,488 (39%) warning letters were issued after 3 to 6 months, i.e. 73% were issued within 6 months;
- (b) for cases with valid EoT or positive response, the cases officers would keep liaising with the owners, consultants, or contractors to offer technical assistance and monitor the progress of the fire safety improvement works required under FSDns. It was more difficult for owners to reach consensus in relation to improvement works in common areas. In case the progress of improvement works was found not satisfactory after a period of time, warning letters would then be issued to the owners;
- (c) for the 150 FSDns for which no warning letters had been issued to the owners (see para. 4.26(b)), while owners in relation to 53 FSDns had provided positive response after June 2025, warning letters had been issued to the owners in relation to the remaining 97 FSDns as of September 2025; and
- (d) the auto-generation of warning letters for non-compliant FSDns function in BCIS was under development and would be implemented tentatively by

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December 2025. It was foreseen that the efficiency in the issuance of warning letters could be improved.

In Audit's view, BD needs to keep in view the development of the auto-generation of warning letters for non-compliant FSDns function in BCIS with a view to improving the compliance with the requirements in FSSM for issuing warning letters.

Need to regularly update the status of remaining outstanding FSDns for timely referrals for taking prosecution actions

4.28 In accordance with FS(IB)O, a prosecution for an offence may only be started before the end of 12 months beginning on the date of which the offence is discovered by, or comes to the notice of, the enforcement authority. According to BD, regarding offence of failing to comply with FSDns, in general, record of non-compliant site inspection or absence of fire certification/test reports required in FSDns would be regarded as sufficient evidence of discovery of the offence. According to FSSM:

- (a) as FSS issues a large number of FSDns each year, normally, prosecutions may be instigated against owners who, upon expiry of FSDns, pay no heed to the warning letters issued to them;
- (b) priority for instigating prosecution should be given to long outstanding cases. To ensure fairness and reduce duplication of efforts when referring cases for prosecution, case officers should also consider the practicality and possibility of dealing with default cases in the same building in one go;
- (c) case officers should arrange compliance inspection and non-compliant cases identified should be immediately referred to FPT of the Mandatory Building Inspection Division for taking prosecution actions; and
- (d) if the owner still fails to comply with FSDns after the first prosecution, except under special circumstances (e.g. owner has passed away, owner has genuine difficulties in complying with FSDn, technical support or social service assistance from BD is required), FPT will apply for FSCO in the second prosecution.

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4.29 As at 30 June 2025, while there were 2,173 outstanding FSDns without positive response, only 112 FSDns (involving 13 TIBs) were referred to FPT related to offence of failing to comply with FSDns. Upon enquiry on the criteria for referring FSDns to FPT, in August to October 2025, BD informed Audit that:

- (a) in general, TIB Unit would refer the non-compliant FSDns to FPT:
 - (i) on a risk-based approach, e.g. industrial buildings without the provision of sprinklers; and
 - (ii) as the implementation schedule for the Phase 1 TIBs was also set on a similar risk-based approach, TIB Unit would normally refer FSDns which had been issued the earliest in Phase 1 TIBs to FPT for taking prosecution actions;
- (b) for cases in the same building where owners were responsive or cite practical difficulties, TIB Unit would continue to offer technical assistance to assist and encourage voluntary compliance; and
- (c) as a tragic fire accident occurred in April 2024, TIB Unit was required to deploy all existing resources in FPT temporarily to step up the prosecution actions against outstanding FSDns under the Fire Safety (Buildings) Ordinance. After the resumption of prosecution actions in May 2025, effort was made to catch up the progress of prosecution referrals. Up to the end of September 2025, 226 FSDns had been referred to FPT for taking prosecution actions.

4.30 Audit sample check of 1 TIB (involving 36 FSDns) with the prosecution actions taken (see para. 4.31(b)) revealed that:

- (a) while 2 FSDns were already complied with and 7 FSDns were pending supersession, 9 FSDns were referred to FPT for taking prosecution actions in October 2023. For the remaining 18 FSDns, they were considered as

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with positive response at the time when the case officer was considering taking prosecution actions in October 2023 (Note 28);

- (b) 4 of the 7 FSDns pending for supersession in October 2023 were subsequently superseded in May 2024 and their compliance periods expired in November 2024;
- (c) as regards the issuance of warning letters, in October 2025, BD informed Audit that after the resumption of prosecution actions in May 2025 (see para. 4.29(c)), case officers had reviewed the updated status of the cases in mid-May 2025 and considered that 23 of the 25 FSDns (i.e. 7 pending supersession and 18 with positive response at the time when considering taking prosecution actions) were without positive response (see para. 4.18(e)). Warning letters were issued in the latter half of May 2025 before taking prosecution actions; and
- (d) as of June 2025, out of the 23 FSDns without positive response, while owner for 1 FSDn notified BD of the completion of works in June 2025, the remaining 22 FSDns had not been referred for taking prosecution actions.

In Audit's view, BD needs to regularly update the status of the remaining outstanding FSDns in the same TIBs for timely referrals of non-compliant FSDns for taking prosecution actions.

Need to closely monitor convicted prosecution cases

4.31 Up to June 2025, prosecution was instigated for 20 (18% of 112) FSDns (involving 3 TIBs (i.e. TIBs A, B and C)) referred to FPT, as follows:

- (a) for TIB A, owner in relation to 1 FSDn with compliance period expired in March 2022 was prosecuted in October 2023. The owner was convicted and fined \$7,540 in December 2023;

Note 28: *According to BD, for 1 FSDn concerning common parts, the owners' corporation had appointed consultant to follow up FSDn requirements. For the remaining 17 FSDns for individual units, positive responses from the owners were noted in 2023 and hence were not referred to FPT in the first batch.*

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- (b) for TIB B, owners in relation to 9 FSDns (6 FSDns with compliance period expired in November 2021 and 3 FSDns with compliance period expired in March 2022) were prosecuted in November 2023. Owners in relation to 6, 1 and 1 FSDns were convicted in April, September and October 2024 respectively and were fined totalling \$43,128, while 1 prosecution was withdrawn due to the death of the related owner; and
- (c) for TIB C, owners in relation to 10 FSDns (9 FSDns with compliance period expired in November 2021 and 1 FSDn with compliance period expired in November 2022) were prosecuted in November 2023. All owners were convicted in September 2024 and were fined totalling \$51,932.

Audit noted that up to August 2025, of the 19 convicted cases, the requirements in 16 (84%) FSDns had not yet been complied with. However, BD had not instigated any second prosecution for these cases, and thus no FSCOs were applied. Audit considers that BD needs to closely monitor these cases and instigate second prosecution where appropriate.

Need to make continued efforts in referring non-compliant FSDns for taking prosecution actions

4.32 Audit noted that for the 56 FSDns referred to FPT on or before March 2025, prosecution actions had been taken for 20 FSDns (see para. 4.31). In 13 of the remaining 36 FSDns pending for taking prosecution actions, the time elapsed from the dates of compliance inspections where non-compliance was identified was over 12 months (ranging from 16 to 21 months as of June 2025). Upon enquiry, in August 2025, BD informed Audit that:

- (a) the compliance inspections of the 13 cases (in which non-compliance was identified over 12 months with no prosecution instigated) were carried out during the period from October 2023 to March 2024; and
- (b) TIB Unit had started to refer cases to FPT in January 2025. After case officers reconfirmed the non-compliance status (i.e. substantiating the evidence of discovery of offence) of all the 13 cases, prosecution works had been re-activated in June 2025.

Follow-up actions on fire safety directions issued by the Buildings Department

In Audit's view, BD needs to make continued efforts in referring the non-compliant FSDns to FPT for taking prosecution actions.

Audit recommendations

- 4.33 **Audit has *recommended* that the Director of Buildings should:**
- (a) **keep in view the development of the auto-generation of warning letters for non-compliant FSDns function in BCIS;**
 - (b) **regularly update the status of the remaining outstanding FSDns in the same TIBs for timely referrals of non-compliant FSDns for taking prosecution actions;**
 - (c) **closely monitor convicted prosecution cases and instigate second prosecution where appropriate; and**
 - (d) **make continued efforts in referring the non-compliant FSDns to FPT for taking prosecution actions.**

Response from the Government

4.34 The Director of Buildings agrees with the audit recommendations. He has said that regarding the audit recommendation in paragraph 4.33(c), as per the past experience, most of the convicted cases showed positive response for the carrying out the improvement works. Hence, under the risk-based approach and the resources available, higher priority is accorded to referral of outstanding FSDns for first prosecution actions at this stage upon resumption of prosecution action since May 2025.

Facilitation measures for target industrial building owners

Need to evaluate and explore facilitation measures for TIB owners

4.35 According to BD, it has been continuously exploring different measures to facilitate owners/practitioners in compliance with FSDns. BD has provided useful information in its website and has launched an E-learning Centre for owners and their representatives to know more about the general requirements and procedures of compliance for FSDns. Public may also use the search function in BD's website to search for the issuance/compliance status of FSDns issued by BD for the common parts and individual units of TIBs.

4.36 A Smart Team was set up in June 2023 in FSS aiming at streamlining/re-engineering the internal workflow and exploring measures to facilitate owners/practitioners in compliance with FSDns. Smart ideas developed include:

- (a) a database of test/assessment reports of fire-rated building products was launched on 31 May 2024; and
- (b) comics demonstrating common difficulties encountered by owners and the corresponding solutions adopting FSS's pragmatic approach would be uploaded to BD's website.

4.37 Upon enquiry on the latest development, BD informed Audit in September and October 2025 that:

- (a) the database of test/assessment reports of fire-rated products would be published in BD's website by December 2025 for owners/practitioners' reference so that they could have an easy reference on what kind of materials were accepted by BD;
- (b) the comics had already been published in BD's website for public's reference;
- (c) to further facilitate the owners in reporting compliance status and maintaining systemic communication records, BD was considering to create a report form of completion which was to be enclosed in FSDns and

Follow-up actions on fire safety directions issued by the Buildings Department

implemented by December 2025. The essential information to be submitted upon notification of completion, such as certificates of fire materials, would be included in the form; and

- (d) a public-facing “Case Management and Reporting Platform” (see para. 4.6(c)) was under development and tentatively implemented by December 2025, which allowed owners or their representatives to submit compliance status of fire safety improvement works, make various applications and enquire about the status of FSDns.

In Audit’s view, BD needs to evaluate the effectiveness of the facilitation measures and continue to explore measures to facilitate owners’/practitioners’ compliance with FSDns.

Audit recommendation

4.38 **Audit has *recommended* that the Director of Buildings should evaluate the effectiveness of the facilitation measures and continue to explore measures to facilitate owners’/practitioners’ compliance with FSDns.**

Response from the Government

4.39 The Director of Buildings agrees with the audit recommendation.

PART 5: OTHER RELATED ISSUES

5.1 This PART examines other related issues on upgrading fire safety in industrial buildings, focusing on:

- (a) enforcement actions taken by FSD and BD on target MSPs (paras. 5.2 to 5.21); and
- (b) financial assistance provided to owners (paras. 5.22 to 5.31).

Enforcement actions taken by the Fire Services Department and the Buildings Department on target mini-storage premises

5.2 In light of the fire incident in Ngau Tau Kok mentioned in paragraph 1.4, in 2021, the Coroner's Court started an inquest into the incident. In May 2022, the jury made several recommendations to FSD (Note 29), BD and relevant parties as endorsed by the coroner, including recommending BD to actively consider adopting a licensing system to regulate the operation of MSPs. In response to Audit's enquiry, in September and October 2025, FSD and BD said that in respect of fire safety:

- (a) the Government had no plan to introduce a licensing regime for MSP at this stage;
- (b) on the basis of the enforcement actions which had all along been taken under the current legislations by the relevant government departments, many trade members had generally understood the relevant requirements. In addition, the requirements for MSP have been specified in the websites of FSD and BD; and
- (c) FSD and BD would continue to rely on the existing regime of identifying fire hazard through inspections, requiring the operators of MSPs and the owners of the premises to rectify irregularities through statutory notices or

Note 29: *According to FSD, in October 2022, it responded to all the recommendations directed at them.*

orders, and take enforcement actions against non-compliance in order to improve the fire safety of MSP.

5.3 During the period from 28 June 2016 to 11 June 2017, FSD, BD and other relevant departments conducted a territory-wide inspection programme of MSPs in order to improve the safety level of MSPs. Thereafter, FSD and BD continued to conduct inspections for those newly-identified target MSPs. Table 10 shows the number of target MSPs inspected by FSD and BD, and the number of FHANs and statutory orders issued to MSP operators and owners of premises respectively from June 2016 to June 2025.

Table 10

**Target MSPs inspected by FSD and BD
(June 2016 to June 2025)**

Year	FSD		BD	
	Number of target MSPs inspected (Note 1)	Number of FHANs issued (Note 2)	Number of target MSPs inspected (Note 1)	Number of statutory orders issued
2016 (from June) to 2017	898	2,839	885	1,681
2018 to 2019	195	240	210	176
2020 to 2021	122	119	107	72
2022 to 2023	258	155	147	95
2024 to 2025 (up to June)	242	100	111	119
Total	1,715	3,453	1,460	2,143

Source: Audit analysis of FSD and BD records

Note 1: FSD and BD might not inspect target MSPs on the same date and thus, the number of target MSPs inspected in each year varied between the two departments due to timing difference. In addition, since October 2021, FSD has conducted recurrent inspection for target MSPs which were inspected and found to be without fire hazards or complied with FHANs previously issued. Therefore, the number of target MSPs inspected by FSD were more than the number of target MSPs inspected by BD since then.

Note 2: With the approval of application for EoT to abate the fire hazards, FSD would issue new FHANs to the operators of target MSPs. The number of FHANs herein only included the FHANs issued to the operators upon the initial inspection and did not include the number of FHANs re-issued upon the grant of EoT.

Remarks: The figures for 2016 to 2017 were mainly attributable to the territory-wide inspection programme while figures for other years referred to the inspections and enforcement actions on newly-identified target MSPs.

Need to make continued efforts in taking follow-up actions on outstanding FHANs and fire hazard orders

5.4 If FSD identifies the existence of a fire hazard in a target MSP, FSD will issue a FHAN under the Fire Services (Fire Hazard Abatement) Regulation to the operator of a target MSP requiring the operator to carry out rectification works. The operator is required to abate the fire hazard within 60 days from the service of the notice. Pursuant to the Regulation:

- (a) ***Non-compliance with FHAN.*** If the operator fails to comply with a requirement in the FHAN within the specific period, he commits an offence and is liable on conviction to a fine at level 6 (i.e. \$100,000 as at 30 June 2025) and to a further fine of \$10,000 for each day during which the offence continues. FSD may also apply to a magistrate for a fire hazard order (FHO), directing the operator to comply with the requirement in the FHAN; and
- (b) ***Non-compliance with FHO.*** If the operator fails to comply with a requirement in the FHO within the specific period, he commits an offence and is liable on conviction to a fine of \$200,000 and to a further fine of \$20,000 for each day during which the offence continues (Note 30).

The operator can submit an application for EoT to comply with the FHANs to FSD (or to the magistrates' court for FHOs) for consideration. If an operator of target MSP complies with FHANs/FHOs, a compliance letter will be issued by FSD.

5.5 From June 2016 to June 2025, FSD and BD inspected 1,460 target MSPs, in which 724 target MSPs were still in operation as at 30 June 2025. Of these 724 target MSPs in operation, 237 (33%) target MSPs were not issued with FHANs/FHOs and the operators of 358 (49%) target MSPs had complied with FHANs/FHOs. For the remaining 129 (18%) target MSPs with outstanding FHANs/FHOs, Audit performed an analysis of the initial inspections carried out in them (see Table 11).

Note 30: *If the operator of a target MSP continues not to comply with a requirement in the FHO, FSD may further apply to the court for prosecution until the requirement is complied with by the operator.*

Table 11

**Initial inspections carried out in target MSPs
with outstanding FHANs/FHOs
(30 June 2025)**

Year of initial inspection	Number of target MSPs		
	Prosecution not yet instigated / in progress	Prosecuted	Total
2016 (from June) to 2017	15	80	95 (74%)
2018 to 2019	1 } 19	5 } 85	6 (5%)
2020 to 2021	3	0	3 (2%)
2022 to 2023	5	5	10 (8%)
2024 to 2025 (up to June)	13	2	15 (11%)
Total	37	92 (Note)	129 (100%)

Source: Audit analysis of FSD records

Note: The operators of these target MSPs were convicted and FHOs were issued.

5.6 **Need to make continued efforts in taking follow-up actions on outstanding FHANs.** As at 30 June 2025, FSD had not instigated any prosecution action against the operators of 34 target MSPs and prosecution was in progress against the operators of 3 target MSPs. Audit examination of the 19 target MSPs subject to initial inspections carried out during 2016 to 2021 revealed that:

- (a) 9 target MSPs were operated by the same company. However, FSD could not instigate prosecution action since the FHANs were not successfully served to the responsible person and the premises were locked when conducting follow-up inspections. For example, in a case, during the period from October 2016 to March 2023, FHANs were served by hand to a staff member of the operator. As fire hazards were found not having been abated in the target MSP, legal action was referred to FSD's Prosecution Section in October 2023. However, the Prosecution Section

advised that since the staff member receiving the FHANs was not a legally authorised individual of the company, it was considered that the FHANs had not been delivered successfully and no further legal action could be taken;

- (b) for 1 target MSP with fire hazard identified in 2018, FSD approved a total of 6 EoT applications submitted by the operator. The expiry date of the FHAN issued upon the sixth approval of EoT was May 2021. However, there was no documentary evidence showing that FSD had followed up the case during May 2021 to April 2025;
- (c) for 1 target MSP with fire hazard identified in 2020, FSD approved an EoT application submitted by the operator and the expiry date of the latest FHAN issued was December 2023;
- (d) for 1 target MSP with fire hazard identified in 2020, FSD conducted follow-up inspection in June 2022 and concluded that the FHAN was complied with. In order to issue the compliance letter, the operator should provide the valid certificates of FSI (see Note 22 to para. 3.17). However, up to 30 June 2025, the submission of certificates of FSI was still pending;
- (e) for 6 target MSPs, their business mode had been changed to one which did not allow direct access by the public (see para. 1.13 and Note 31); and
- (f) for 1 target MSP, the FHAN was subsequently complied with in August 2025.

5.7 In October 2025, FSD informed Audit that:

- (a) regarding the cases mentioned in paragraph 5.6(a), enforcement actions would be reinitiated against these target MSPs;
- (b) regarding the case mentioned in paragraph 5.6(b), inspection was conducted in July 2023, together with the adjacent unit which operated another target

Note 31: *FSD will conduct periodic inspection for these premises every 6 to 9 months to review their business modes.*

Other related issues

MSP (by the same operator) and the FHANs issued for these two target MSPs were found complied with. However, the case officer mistakenly treated the two cases as one and the compliance letter was only issued to the adjacent target MSP. In May 2025, FSD conducted inspection on the target MSP and due to the change of its layout, a fresh FHAN was issued to the operator. During the follow-up inspection in August 2025, the fire hazard was found abated and the relevant FHAN was complied with. The compliance letter would be issued once all supporting documents were received; and

- (c) regarding the case mentioned in paragraph 5.6(c), due to the changes of responsible staff members in the target MSP, a follow-up inspection was conducted in September 2025.

In Audit's view, FSD needs to make continued efforts in taking follow-up actions on outstanding FHANs and consider stepping up measures in handling prolonged non-compliant cases (e.g. applying for warrant for entry into target MSPs — Note 32). In addition, FSD needs to take measures to ensure that the FHAN is served to a legally authorised individual of the company operating the target MSP.

5.8 *Need to make continued efforts in taking follow-up actions on outstanding FHOs.* As at 30 June 2025, FHOs issued to operators of 92 target MSPs were outstanding. Of the 92 target MSPs, 80 (87%) were initially inspected with fire hazard found in 2016 and 2017. However, most of the operators were first convicted in 2022 and 2023 due to the judicial review lodged by operators of several MSPs against FSD (Note 33). Audit analysis of the convicted operators of the 85 target MSPs subject to initial inspection carried out during 2016 to 2021 revealed that the

Note 32: *According to FSD's Law Enforcement Guidelines for MSPs, if admission to any MSP has been refused, or that refusal is apprehended, or that the premises are unoccupied or the occupier is temporarily absent, or that the case is one of urgency, or that an application for admission would defeat the object of the entry, consideration should be given to apply for an entry warrant according to section 8(2) of the Fire Services Ordinance (Cap. 95) to enter the premises for inspection.*

Note 33: *The operators of 3 MSPs had applied to the court for leave to apply for judicial review from 2018 to 2020 of the "Potential Fire Hazards in MSPs and Related Abatement Measures" implemented by FSD. The court refused leave to apply for judicial review in December 2019 and dismissed the subsequent appeal in April 2022.*

latest conviction dates (see Note 30 to para. 5.4(b)) of operators of 28 and 57 target MSPs were in 2022 to 2023 and 2024 to 2025 respectively. Of the 28 target MSPs with latest conviction dates in 2022 and 2023:

- (a) EoT was granted to an operator of 19 (67% of 28) target MSPs and the expiry dates had not been due as at 30 June 2025;
- (b) EoT was granted to an operator of 1 (4% of 28) target MSP and the expiry date was in June 2025. FSD subsequently conducted a follow-up inspection in July 2025 and found no improvement as ordered. According to FSD, prosecution action against the operator would be taken;
- (c) FSD conducted follow-up inspections in 6 (21% of 28) target MSPs from February to June 2025. For 2 target MSPs, the fire hazard was found to be abated during the inspections in May and June 2025. For the other 4 target MSPs which the fire hazards were found not yet be abated, prosecution actions against the non-compliance of FHOs were in progress;
- (d) for 1 (4% of 28) target MSP, FSD conducted follow-up inspection in March 2024 and concluded that the FHO was complied with. However, up to 30 June 2025, the certificates of FSI were still pending from the operator in order to issue the compliance letter; and
- (e) for 1 (4% of 28) target MSP, its business mode had been changed to one which did not allow direct access by the public (see para. 1.13 and Note 31 to para. 5.6(e)).

In Audit's view, FSD needs to make continued efforts in taking follow-up actions on outstanding FHOs.

Need to make continued efforts in taking follow-up actions on outstanding statutory orders by BD

5.9 If irregularities on the fire safety construction (see para. 1.13(b)) are identified in a target MSP during inspection, BD will issue statutory order(s) under sections 24(1) and/or 26 of the Buildings Ordinance to the owner of premises operating target MSP requiring the owner to carry out rectification works. The owner is required to commence the works within 30 days and complete such works within

Other related issues

60 days of the date of the order. The owners can submit an application for EoT to comply with the order(s) to BD for consideration. Pursuant to the Buildings Ordinance:

- (a) ***Non-compliance with section 24(1) of the Buildings Ordinance.*** If the owner, without reasonable excuse, fails to comply with the order, he commits an offence and is liable on conviction to a fine of \$200,000 and to imprisonment for one year, and to a fine of \$20,000 for each day during which the failure has continued. In addition, when there is serious risk to life or where owners are unable to undertake the works, the Building Authority may carry out the required works on the owner's behalf and recover the cost of such works, plus supervision charge and a surcharge of up to 20% from the owner; and

- (b) ***Non-compliance with section 26 of the Buildings Ordinance.*** If the owner, without reasonable excuse, fails to comply with the order, he commits an offence and is liable on conviction to a fine of at level 5 (i.e. \$50,000 as at 30 June 2025) and to imprisonment for one year, and to a fine of \$5,000 for each day during which the failure has continued.

5.10 In 2022, BD set an internal performance target and formed a dedicated team under its Squad Unit to clear long-outstanding orders (i.e. orders issued before 2018) by issuing warning letters and initiating more prosecution proceedings. The target was set in terms of the number of target MSPs involved. As BD observed that a more rigorous enforcement approach significantly enhanced compliance rate, in February 2025, a new work plan was endorsed to shift the focus to making more referrals to BD's Legal Services Section (LSS) for instigating prosecution.

5.11 According to BD's Guidelines on Inspection of MSPs, when a statutory order is expired (i.e. normally 60 days after issuance), BD will arrange a compliance inspection and if the order is complied with, a compliance letter will be issued to the owner. For non-compliant case, a warning letter will be issued or the case will be referred to LSS for prosecution. According to BD, in order to streamlining the process for enhancing more voluntary compliance of order, BD will first issue warning letters to the owners, followed by compliance inspections and referral to LSS for prosecution if applicable.

5.12 From June 2016 to June 2025, statutory orders were issued to owners of 1,039 (71% of the 1,460 premises inspected — see Table 10 in para. 5.3) premises operating target MSPs. As at 30 June 2025, the status of statutory orders issued to the owners of these premises were as follows (see Table 12):

- (a) statutory orders issued to owners of 764 (74%) premises operating target MSPs had been complied with/withdrawn; and
- (b) statutory orders issued to owners of 275 (26%) premises operating target MSPs had not been complied with. Of which:
 - (i) the compliance period of statutory orders issued to the owners of 20 premises were not yet expired (including those with EoT);
 - (ii) for 56 premises, the cases were referred to LSS for prosecution action. Of which, the owners of 31 premises were convicted, summonses were issued to the owners of 16 premises and the remaining 9 cases were under processing by LSS; and
 - (iii) for the remaining 199 premises, the compliance period of statutory orders issued to the owners were expired but not yet referred to LSS for prosecution (see paras. 5.13 and 5.14).

Table 12

Premises operating target MSPs with statutory orders issued
(30 June 2025)

Year of issuance	Number of premises operating target MSPs					Total
	Statutory orders complied with/ withdrawn	Statutory orders not complied with			Total	
		Compliance period not yet expired	Compliance period expired			
			Referred to LSS	Not referred to LSS		
2016 (from June) to 2017	636 (80%)	1 (1%)	50 (6%)	104 (13%)	791 (100%)	
2018 to 2019	57 (66%)	0 (0%)	4 (4%)	26 (30%)	87 (100%)	
2020 to 2021	26 (65%)	0 (0%)	2 (5%)	12 (30%)	40 (100%)	
2022 to 2023	29 (49%)	1 (2%)	0 (0%)	29 (49%)	59 (100%)	
2024 to 2025 (up to June)	16 (26%)	18 (29%)	0 (0%)	28 (45%)	62 (100%)	
Overall	764 (74%)	20 (2%)	56 (5%)	199 (19%)	1,039 (100%)	

275 (26%)

Source: Audit analysis of BD records

5.13 For the cases of 199 premises not yet referred to LSS, Audit analysed the warning letters issued to owners of premises operating target MSPs (see Table 13) and noted that among the 104 premises with statutory orders issued in 2016 and 2017:

- (a) warning letters had not been issued to the owners of 2 premises operating target MSPs. Of these 2 cases:

- (i) in a case, the statutory orders were subsequently withdrawn in July 2025 since the remaining outstanding items required to be improved were included in FSDns issued by TIB Unit (see para. 4.19(b)(i)) in October 2024; and
 - (ii) in another case, compliance inspection was conducted in August 2025 (see para. 5.14(a)); and
- (b) warning letters had been issued to owners of 6 premises more than two years ago (i.e. in 2022). Of these 6 premises:
 - (i) compliance inspections were conducted in 2024 and 2025 for 5 premises (see para. 5.14(b)); and
 - (ii) for the remaining 1 premises, a superseding order was issued to the new owner in August 2025 due to the change of ownership of the premises.

Table 13

**Warning letters issued to premises operating target MSPs
for outstanding statutory orders not referred to LSS
(January 2022 to June 2025)**

Year of issuance of statutory orders	Number of premises operating target MSPs						
	Year of issuance of warning letters				Warning letters not yet issued	Total	
	2022	2023	2024	2025 (up to June)			
2016 (from June) to 2017	6	50	11	35	2	104	(52%)
2018 to 2019	0	2	23	1	0	26	(13%)
2020 to 2021	0	1	10	1	0	12	(6%)
2022 to 2023	0	0	6	17	6	29	(15%)
2024 to 2025 (up to June)	0	0	0	1	27	28	(14%)
Total	6	53	50	55	35 (Note)	199	(100%)

164

Source: *Audit analysis of BD records*

Note: *According to BD, issuance of warning letters was not required for the 2 premises with statutory orders issued during 2016 to 2017 (see para. 5.13(a)). Of the 33 premises with statutory orders issued during 2022 to 2025:*

- (a) *statutory orders issued to owners of 10 premises had been subsequently complied with during July to September 2025;*
- (b) *warning letters had been subsequently issued to owners of 13 premises (for statutory orders expired from October 2024 to June 2025) in August and September 2025; and*
- (c) *for the remaining 10 premises, rectification works were in progress as of 30 September 2025.*

Remarks: *For these 199 premises, all warning letters were issued in or after 2022.*

5.14 In October 2025, BD informed Audit that:

- (a) regarding the case mentioned in paragraph 5.13(a)(ii), BD had been following up with the owner on the rectification works; and
- (b) regarding the case mentioned in paragraph 5.13(b)(i), rectification works were in progress or completed in 2 premises and prosecution were initiated to owners of the other 3 premises.

5.15 Audit further analysed the compliance inspections conducted by BD (see Table 14) and noted that although warning letters were issued to owners of 164 (82% of 199 — see Table 13 in para. 5.13) premises operating target MSPs, BD had only conducted inspections in 42 (21% of 199) premises during the period from January 2023 to June 2025. In Audit's view, BD needs to make continued efforts in issuing warning letters and arranging compliance inspections with owners with long outstanding statutory orders.

Table 14

Compliance inspections conducted for premises issued with outstanding statutory orders and not referred to LSS (January 2023 to June 2025)

Year of issuance of statutory orders	Number of premises operating target MSPs				
	Year of compliance inspections conducted			Compliance inspections not conducted	Total
	2023	2024	2025 (up to June)		
2016 (from June) to 2017	2	9	23	70	104 (52%)
2018 to 2019	0	0	1	25	26 (13%)
2020 to 2021	0	0	0	12	12 (6%)
2022 to 2023	0	0	6	23	29 (15%)
2024 to 2025 (up to June)	0	0	1	27	28 (14%)
Total	2	9	31	157	199 (100%)

42

Source: Audit analysis of BD records

Remarks: As mentioned in paragraph 5.10, a dedicated team was set up in 2022 to clear long outstanding orders by issuing warning letters and initiating more prosecution proceedings. In this connection, only the latest compliance inspections conducted after 2022 were taken into account in the table.

Need to review the score assigned to target MSPs based on the Fire Risk Prioritisation Scoring System

5.16 As mentioned in paragraph 5.10, in February 2025, a new work plan was endorsed to shift the focus to making more referrals to LSS for instigating prosecution. To implement the new work plan, BD adopted a Fire Risk Prioritisation Scoring

System to prioritise non-compliant cases for close monitoring in batches. BD will assign each target MSP a numerical risk score based on the two key dimensions within each year group (Note 34). The two key dimensions are:

- (a) ***Level of sprinkler protection.*** A target MSP without sprinklers has the highest score whereas a target MSP with automatic sprinkler systems has the lowest score; and
- (b) ***Number of cubicles (or usable floor area if number of cubicles is not available) in the MSP.*** A target MSP with more than 300 cubicles has the highest score whereas a target MSP with less than 100 cubicles have the lowest score.

5.17 Audit examined the scores assigned to target MSPs and noted that the number of cubicles was based on the inspections conducted some time ago. As at 30 June 2025, of the 275 target MSPs with outstanding statutory orders issued to the premises owners, 61 target MSPs were closed according to FSD's records. As closed MSPs may pose a lower fire risk, Audit considers that BD needs to obtain the latest information of target MSPs from FSD in order to prioritise its workload effectively in following up the outstanding statutory orders.

Audit recommendations

5.18 **Audit has recommended that the Director of Fire Services should:**

- (a) **make continued efforts in taking follow-up actions on outstanding FHANs and consider stepping up measures in handling prolonged non-compliant cases (e.g. applying for warrant for entry into target MSPs);**
- (b) **take measures to ensure that the FHAN is served to a legally authorised individual of the company operating the target MSP; and**

Note 34: *The outstanding orders were classified into four year groups: (a) Group 1: issued in 2016 and 2017; (b) Group 2: issued from 2018 to 2021; (c) Group 3: issued in 2022 and 2023; and (d) Group 4: issued in 2024 and after.*

Other related issues

- (c) **make continued efforts in taking follow-up actions on outstanding FHOs.**

5.19 Audit has *recommended* that the Director of Buildings should:

- (a) **make continued efforts in issuing warning letters and arranging compliance inspections with owners with long outstanding statutory orders; and**
- (b) **obtain the latest information of target MSPs from FSD in order to prioritise BD's workload effectively in following up the outstanding statutory orders.**

Response from the Government

5.20 The Director of Fire Services agrees with the audit recommendations in paragraph 5.18. He has said that FSD:

- (a) has reminded its staff to enhance the management of outstanding cases by utilising the “bring-up reminder” function in the Integrated Licensing, Fire Safety and Prosecution System and by conducting regular review to ensure timely follow-up actions and closer case monitoring. In addition, officers have been reminded to exercise their authority under section 8 of the Fire Services Ordinance to apply for warrants of entry in cases of prolonged non-compliance where access is denied, so as to facilitate necessary inspections and enforcement actions when warranted;
- (b) will explore additional means to identify appropriate recipients of FHAN on behalf of the target MSP concerned so as to better facilitate subsequent enforcement action, if necessary; and
- (c) has reminded its staff to closely monitor the outstanding FHOs, with a view to ensuring that those concerned cases are to be followed up and that the statutory requirements are complied with in a timely manner.

5.21 The Director of Buildings agrees with the audit recommendations in paragraph 5.19. He has said that:

- (a) an information technology system to automatically generate warning letters for outstanding orders is being developed and will be implemented in December 2025. The function can ensure issuing of warning letters directly once the orders are expired;
- (b) the annual performance targets of MSP enforcement for 2025 has been enhanced to refer 80 outstanding orders to LSS for prosecution and discharge 150 orders. To achieve the targets, compliance inspections for at least 230 outstanding orders (involving around 115 MSPs) are needed to be carried out annually. Taking into account that 30% of the compliance inspections are for those voluntary compliance cases, compliance inspections carried out within 2026 will cover at least the 70 MSPs with outstanding orders issued in 2016 and 2017; and
- (c) BD has agreed with FSD to set up a mechanism to obtain the information of closed MSPs from FSD quarterly. The Fire Risk Prioritisation Scoring System will be revised to reflect a lower risk score to those closed MSPs on a quarterly basis.

Financial assistance provided to owners

5.22 The Building Safety Loan Scheme (BSLS — Note 35) launched by BD commenced operation in July 2001 to offer loans to individual owners of private buildings for carrying out maintenance and repair works to improve the safety of their buildings (Note 36). Owners of old industrial buildings who need to conduct

Note 35: *In April 2001, the Finance Committee of the Legislative Council approved the merger of the Fire Safety Improvement Loan Scheme and the Building Safety Improvement Loan Scheme into BSLS (also known as the Comprehensive Building Safety Improvement Loan Scheme) with a commitment of \$700 million to provide loans to building owners who need financial assistance to improve the safety of their premises.*

Note 36: *In addition to BSLS, owners may also apply for various subsidy schemes under the Integrated Building Rehabilitation Assistance Scheme of the Urban Renewal Authority.*

Other related issues

improvement and building repair works (including fire safety improvement works) may apply for BSLS. Salient points of BSLS are as follows:

- (a) **Application.** For an application relating to repair works in the common parts of a building, the application should be submitted prior to completion of the works, while for an application relating to repair works in an individual unit, the application should be submitted prior to commencement of the works;
- (b) **Loan amount.** The loan amount to be applied for shall not exceed the cost of repair works to be contributed for the common part(s) of the property under application or the quotation price of repair works for an individual unit. The amount of the loan shall be determined by the Director of Buildings, subject to a ceiling of \$1 million per unit of accommodation; and
- (c) **Release and repayment of loans.** Subject to the signing of a loan agreement, the approved loan will be released by stages, in no more than three drawdowns, according to the actual progress of works. The maximum repayment period is 36 months for an interest-bearing loan and 72 months for an interest-free loan (Note 37). The first instalment will become due one month after the final drawdown of the loans.

5.23 **Processing of applications.** BSLS Unit (see para. 1.15(c)) is responsible for administering BSLS. According to BD's procedure manual for BSLS, BSLS Unit will vet the application forms and the supporting documents submitted, and will issue letters to the applicants (for applications relating to works in individual units) or the related owners' corporations (for applications relating to works in the common parts of a building) for clarifications and/or supporting documents where necessary. Referrals would be sent to the appropriate teams/sections within BD and/or relevant departments for vetting of the proposed works. Reminders will be prepared if no replies were received. Loans with a loan amount not exceeding \$50,000 will be approved by a Senior Executive Officer while those with a loan amount exceeding

Note 37: *Applicants of interest-bearing loans are not required to go through means-test. They are required to pay interest at a rate determined by the Government on the no-gain-no-loss principle. Applicants (other than registered companies) who have financial difficulties may apply for interest-free loans.*

\$50,000 will be approved by BSLs Vetting Committee (Note 38). All applications should normally be approved in 9 months from the date of receipt of the application.

5.24 According to BD, from April 2020 to June 2025, applications were received relating to 42 premises for carrying out improvement works in industrial buildings which include fire safety improvement works. As at 30 June 2025, of the 42 premises:

- (a) applications relating to 19 (45%) premises were approved with total approved loans amounting to \$3.15 million;
- (b) applications relating to 10 (24%) premises were approved but subsequently withdrawn by the applicants;
- (c) applications relating to 11 (26%) premises were withdrawn by the applicants; and
- (d) applications relating to the remaining 2 (5%) premises received in 2025 were under processing.

Need to consider setting time limit for issuing reminders

5.25 Audit analysis of the 29 (19+10) premises (see para. 5.24(a) and (b)) with applications approved (involving 24 applications) found that:

- (a) 16 applications relating to 16 (55%) premises were approved within 9 months, with time taken ranging from 35 to 175 days and averaging 98 days; and
- (b) 8 applications relating to 13 (45%) premises were approved over 9 months from the dates of receipt of the applications, with time taken ranging from 292 to 610 days and averaging 422 days. Audit examination of these

Note 38: *BSLS Vetting Committee is chaired by a Chief Professional Officer/District Team from EBDs. Its members comprise 1 Senior Professional Officer/District Team from EBDs, 1 of the 9 Authorised Persons by rotation and 1 of the 18 District Council, Area Committee, District Fight Crime Committee/District Fire Safety Committee members by rotation.*

Other related issues

8 applications (involving 6 buildings) revealed that it took some time for the applicants/owners' corporations in submitting all supporting documents. While no time limit for issuing reminders was stipulated in the procedure manual, the actual time between sending letters requesting for supporting documents and sending reminders varied. For instance, the average time for issuing the first reminders to owners' corporations was 116 days, ranging from 49 to 332 days.

5.26 In October 2025, BD informed Audit that:

- (a) in order to facilitate BD's processing of individual owners' applications, owners' corporations would normally be required to make available supporting documents, including but not limited to the consultant/Authorised Person contract and works contract, which might only be signed by the owners' corporations after collection of a substantial amount of shared cost from individual owners. It might take a longer lead time for the owners' corporations to make available such documents after issuing fund raising notice notifying individual owners of their shared cost. Upon release of the notification, individual owners in need of financial assistance would submit BSLS applications; and
- (b) applications relating to 10 premises (involving 5 applications) mentioned in paragraph 5.25(b) were received in 2020 when COVID-19 epidemic was severe. The work efficiency of all the involved parties (including but not limited to the owners' corporations) were inevitably adversely affected. For the remaining 3 premises (involving 3 applications), the processing time (with the time for issuing the first reminders averaging 61 days and ranging from 49 to 86 days per reminder) ranged from 292 to 348 days (averaging 323 days, which just slightly fell beyond 9 months).

In Audit's view, BD needs to consider setting time limit for issuing reminders when processing BSLS applications in the procedural manual with a view to facilitating the processing of applications.

Need to step up the promotion of BSLS to owners of TIBs with FSDns issued

5.27 According to BD, it adopts multiple tiers of promotion means for BSLS, as follows:

- (a) ***Tier 1.*** To arouse public awareness, a dedicated thematic webpage was set up under BD's website. Information about BSLS is also featured in the pamphlets related to the fire safety ordinances;
- (b) ***Tier 2.*** Information about BSLS is featured at the explanatory note for FSDns and covering letters of statutory order issued by BD for the particular attention of target parties issued with statutory orders/FSDns;
- (c) ***Tier 3.*** BD staff attends meetings/talks for the parties involved in the planning of building maintenance projects; and
- (d) ***Tier 4.*** BD issues promotional notice for the particular attention of target flat owners who are required to share the building maintenance project cost.

5.28 Outstanding FSDns with related applications for financial assistance were considered by BD as with positive response. As at 30 June 2025, of the 42 premises with related applications for BSLS for carrying out improvement works in industrial buildings which include fire safety improvement works, 12 premises were located at Phase 1 TIBs where joint inspections had been conducted by FSD and BD with FSDns issued with compliance period from 6 months to 1 year. Audit noted that:

- (a) according to BD's procedure manual, BSLS Unit will issue promotional notice (see para. 5.27(d)) to owners' corporations for encouraging loan applications as appropriate. Audit scrutiny of the case files found that such promotional notices were usually issued to the owners' corporations in the letters requesting for supporting documents relating to the first application received for a particular building; and
- (b) applications relating to 5 of the 12 premises were submitted after the issuance of FSDns, of which 3 applications were relating to works in individual units, their applications were submitted 468 days on average after FSDns were issued, ranging from 417 to 570 days.

Other related issues

5.29 According to BD, upon receipt of FSDns, individual owners will only submit BSLs application after having been notified of the cost for the works. The applicants of the three applications mentioned in paragraph 5.28(b) submitted their applications within 30 days after obtaining works quotations. In Audit's view, BD needs to issue promotional notice of BSLs together with FSDns to owners of TIBs in order to draw their attention earlier to the financial assistance offered under BSLs.

Audit recommendations

5.30 **Audit has recommended that the Director of Buildings should:**

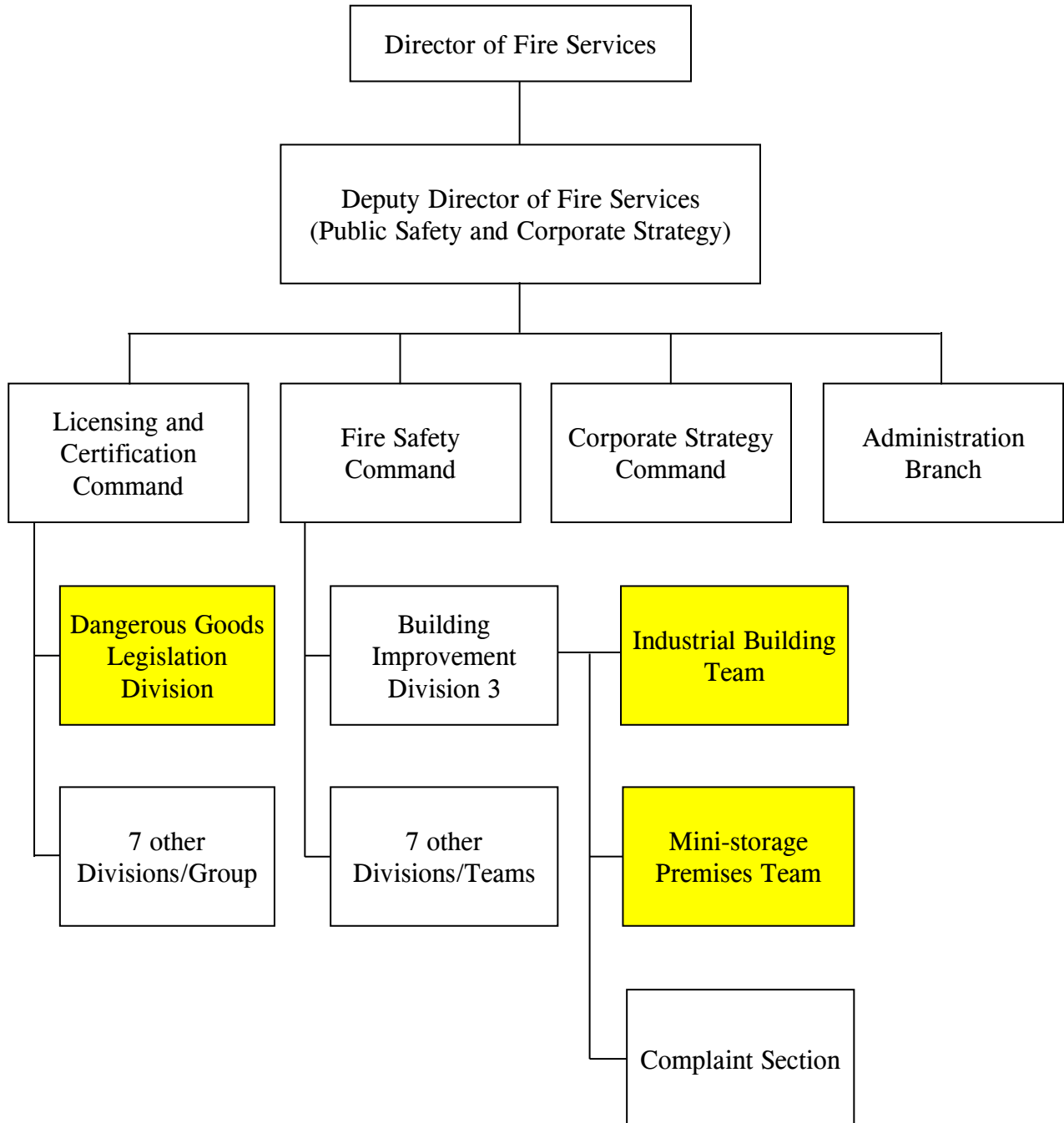
- (a) **consider setting time limit for issuing reminders when processing BSLs applications in the procedural manual; and**
- (b) **issue promotional notice of BSLs together with FSDns to owners of TIBs.**

Response from the Government

5.31 The Director of Buildings agrees with the audit recommendations. He has said that:

- (a) whilst there is no time limit for issuing reminders laid down in the procedural manual, BSLs Unit generally adopts certain time frame for issuing reminders since January 2022 in practice. BD will review the prevailing practice on the timeline for issuing reminders to relevant parties (i.e. owners' corporation/applicant). The revised timeline will be stipulated in the procedural manual; and
- (b) BD will enhance the current promotional measures by issuing promotional notice containing the general information and contact of BSLs together with FSDns to facilitate the FSDns recipients to draw the owners' earlier attention to the financial assistance offered under BSLs by serving the promotional notice at the conspicuous part of the buildings or otherwise accordingly.

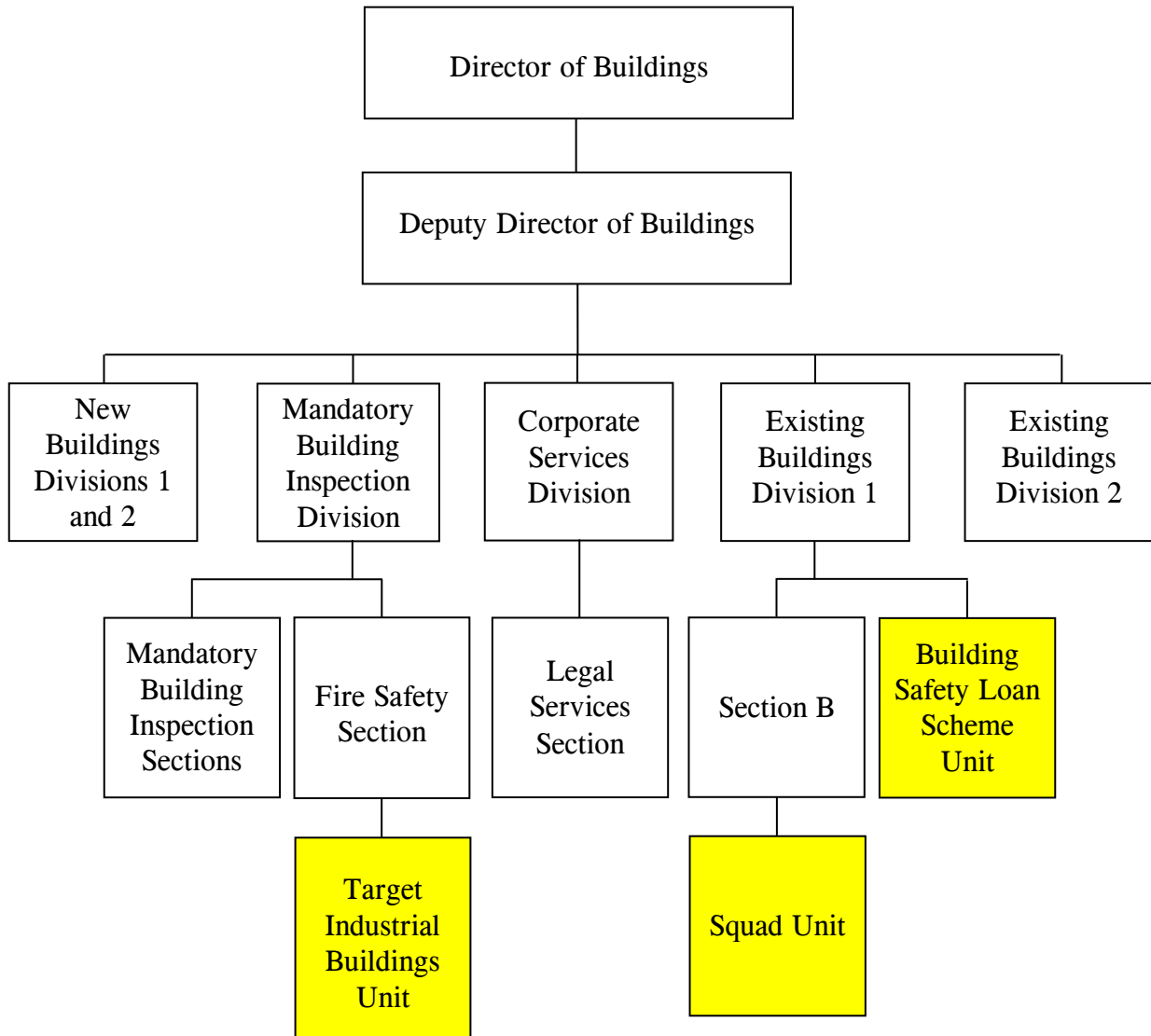
**Fire Services Department:
Organisation chart (extract)
(30 June 2025)**



Legend: Teams/division covered in this Audit Report

Source: *FSD records*

**Buildings Department:
Organisation chart (extract)
(30 June 2025)**



Legend:  Units covered in this Audit Report

Source: *BD records*

Acronyms and abbreviations

Audit	Audit Commission
BCIS	Building Condition Information System
BD	Buildings Department
BSLS	Building Safety Loan Scheme
CPI(FP)	Fire Protection Commands Procedural Instructions
EBDs	Existing Buildings Divisions
EoT	Extension of time
FHAN	Fire hazard abatement notice
FHO	Fire hazard order
FPT	Fast Track Prosecution Team
FSCO	Fire safety compliance order
FSD	Fire Services Department
FSDns	Fire safety directions
FSI	Fire service installations or equipment
FSI code	The Code of Practice for Minimum Fire Service Installations and Equipment
FS(IB)O	The Fire Safety (Industrial Buildings) Ordinance
FSS	Fire Safety Section
FSSM	Fire Safety Section Manual
LSS	Legal Services Section
MBISs	Mandatory Building Inspection Sections
MSPs	Mini-storage premises
RFSICs	Registered fire service installation contractors
TIBs	Target industrial buildings
UBWs	Unauthorised building works