

Executive Summary

Direct Investigation Operation Report

Illegal Disposal of Construction Waste and “HoHoSkips” Recycling Service

Introduction

Construction works such as site levelling and building construction, and general renovation works for residential, commercial, catering and office premises inevitably generate a considerable amount of construction waste. To facilitate the proper disposal of construction waste generated from minor renovation projects by the public and small-to-medium renovators, the Environmental Protection Department (“EPD”) launched a pilot scheme in February 2021 for the collection and recycling of construction waste at the district level. Through the mobile application “HoHoSkips” under the scheme, members of the public and the trade can book the service of recycler subsidised by the Recycling Fund for proper disposal of construction waste.

2. Nevertheless, the Office has noted from time to time media reports and public complaints about illegal disposal of construction waste in public places, particularly on the roadside. Such illegal activities not only cause inconvenience and safety hazards to the public and road users, but also affect environmental hygiene and require the use of public resources for clean-up. Moreover, data suggests an underuse of the “HoHoSkips” recycling service.

3. In this connection, the Office has examined EPD’s control and preventive measures against illegal disposal of construction waste, the operational arrangements of the “HoHoSkips” scheme and monitoring of its effectiveness, information dissemination, and promotion and publicity. Based on our findings, the Office has the following observations and comments on the relevant work of EPD.

Our Findings

(I) Enforcement against Illegal Disposal of Construction Waste

4. Over the years, EPD has spared no effort to adopt multi-pronged measures against illegal disposal of construction waste, including the installation of surveillance

camera systems, establishment of a drone fleet, enhanced patrolling, collaboration with other departments, and compilation of a list of priority sites for reinforced surveillance. Coupled with the current-term Government's more stringent enforcement and hiking the fixed penalty from \$1,500 to \$6,000 in 2023, the quantity of illegally disposed construction waste cleared by the Government dropped substantially from 9,000 tonnes in 2017 to around 1,000 tonnes per year between 2022 and 2024. The number of illegal disposal cases confirmed by EPD fell by 38%, from 4,612 cases in 2022 to 2,841 cases in 2024. These figures reflect the substantive results of the enforcement efforts of the Administration, which are certainly commendable.

5. Despite the marked improvement in recent years, the Office has noted that public complaints about illegal disposal of construction waste stand at over 1,000 cases annually. Among the complaints, the number of illegal disposal cases confirmed by EPD increased to nearly 800 in 2024 from the level of 500 to 600 a few years ago. Moreover, during our site inspections and shadowing of EPD's operations, it was not uncommon to find construction waste dumped on streets. Apparently, the illegal disposal problem recurs time and again with negative impact on the public and environmental hygiene. Government authorities should continue stepping up enforcement to further address the issue.

Prosecution Rate Too Low to Serve as a Deterrent

6. Between 2019 and 2024, EPD annually instigated 65 to 129 prosecutions, or an average of around 102 cases. In 2023, for example, EPD confirmed 4,153 illegal disposal cases of construction waste but only instigated 65 prosecutions, resulting in a prosecution rate of just 1.6%. Even in 2019, the year with the highest number of prosecutions (129 cases), the prosecution rate was only 3.8% out of 3,390 confirmed cases. These figures indicate that EPD's prosecution rate against illegal disposal of construction waste is extremely low. The Office considers that the deterrent effect of hiking the fixed penalty could be undermined unless EPD improves its evidence-gathering effectiveness to initiate more prosecutions.

7. The Office acknowledges that successful enforcement and prosecution is not an easy task. However, to further combat illegal disposal, we urge EPD to explore how to further strengthen its enforcement and evidence-gathering effectiveness, such as by making greater use of technologies to assist and optimise evidence collection, flexibly deploying staff for targeted inspections and blitz operations, and expanding the coverage of surveillance systems, so as to improve prosecution rate and deterrence.

8. In addition to closely monitoring black spots of fly-tipping, the Office recommends that EPD also consider reinforcing patrols and surveillance in other areas where such offences are more likely to occur (such as in the vicinity of newly completed housing estates, and buildings and shops with renovation or repair works in progress) to achieve more targeted enforcement.

Strengthening Publicity and Education

9. Enforcement alone is insufficient to address the illegal disposal problem; developing a strong sense of self-discipline and compliance among the public and the trade is also crucial. Although the Construction Waste Disposal Charging Scheme has been in place for nearly two decades, illegal disposal of construction waste by members of the trade and the public still occurs. People are acting either inadvertently due to a lack of awareness of laws, or deliberately for convenience and avoidance of expenses. EPD should continue to strengthen publicity and education through various channels, raising awareness of environmental protection and compliance among the public and the trade.

(II) “HoHoSkips” Scheme

Insufficient Promotion of the Scheme

10. The “HoHoSkips” scheme has been in operation for over four years. Although EPD said that it has promoted the scheme through various channels and multiple outreach visits, some trade organisations told us that many members of the trade and small-to-medium organisations or companies were unaware of the “HoHoSkips” service until the launch of our direct investigation operation. They, therefore, considered EPD’s promotion and publicity of the scheme inadequate. The Office recommends that EPD review the effectiveness of its promotion initiatives to ensure that the scheme becomes more widely recognised among the trade and the public. EPD should also consider enhancing promotion in areas where more minor works are expected (such as in the vicinity of newly completed housing estates) to encourage residents and renovators to use the “HoHoSkips” service.

Better Usage of Scheme Resources

11. In 2023, the recycler had capacity to arrange a maximum of 7,552 collections, but only 4,718 collections were made by year end, resulting in a service

usage rate of 62.5%. The Office notes that the underuse of collection service was not due to a lack of demand. EPD's data shows that 56.3% of "HoHoSkips" bookings in 2023 were cancelled for various reasons, of which 27.8% were due to insufficient capacity of the recycler to meet the demand at peak times. Yet, the overall service capacity was underused, reflecting a mismatch between the operational planning and resource allocation under the scheme and the actual needs of users at that time, which was a waste of precious resources.

12. The Office is pleased to note that following the launch of our investigation, EPD has improved the booking process by allowing users to view whether a time slot has been fully booked and showing alternative available slots for their consideration. As this new mobile app feature has been introduced for some time, the Office recommends that EPD review its effectiveness. EPD should also work with the recycler to explore feasible ways of shifting service demand from peak to off-peak times.

13. In 2024, the recycler made 1,062 more collections than in 2023, raising the total number of collections to 5,780 and the service usage rate from 62.5% in 2023 to 76% in 2024. The percentage of cancellations due to overbooking also dropped to 12.1% in 2024, indicating a significant improvement in the usage of "HoHoSkips" resources recently.

14. The increase in the number of collections and usage rate in 2024 shows that public demand for the "HoHoSkips" service remains strong. EPD stated that the new applicant provider of "HoHoSkips" service has reserved resources to improve operational arrangements, with a view to maximising the transport capacity of its collection fleet to handle more bookings. The Office recommends that EPD conduct timely review of the usage rate after the takeover of "HoHoSkips" service by the new recycler, and explore ways of better resource allocation to increase available service at peak times and minimise cancellations. This will ensure better use of public funds for the benefit of more users.

Enhancing Service Delivery

15. EPD said that based on the operational experience of the "HoHoSkips" scheme, it takes around 1 hour and 15 minutes to complete a collection case. However, our site inspections revealed that the entire process could be completed within 30 minutes, from the arrival of the collection vehicle at the collection point to the payment of disposal costs by the user. This suggests that most of the average handling time

cited by EPD is probably spent on travelling between collection points. The Office understands that currently only four collection vehicles are available under the scheme for handling bookings across all Hong Kong Island, Kowloon and New Territories areas. Travel time may also be affected by factors including traffic conditions, waste quantity, and mechanical malfunctions. We recommend that EPD work with the recycler to shorten the average handling time per case (such as shortening the travel time per case by better route planning), so as to accommodate more bookings. EPD should also analyse the geographic distribution of past bookings and consider offering collection service at fixed times and locations in districts with high demand. This will provide more convenient service for users in these districts and reduce travel time for collection vehicles.

16. The Office also recommends that EPD closely monitor changes in the demand for “HoHoSkips” service. If demand continues to rise, EPD should consider increasing the number of collection vehicles and manpower to meet the growing demand. Given Hong Kong’s narrow and congested roads, the “HoHoSkips” scheme should prioritise deploying light goods vehicles that are easier to park by the roadside.

17. Additionally, the Office recommends that EPD engage with “HoHoSkips” users and the trade, or incorporate a feedback feature into the “HoHoSkips” mobile app to gather useful input for service improvement.

User Guidelines Missing Key Information

18. The Office notes that some “HoHoSkips” bookings were cancelled because of users’ lack of understanding about the scope of service under the scheme. Examples include requests for waste collection within too short a time frame (i.e. two hours), waste that does not meet requirements, or collection points unsuitable for parking. When users make a booking via the “HoHoSkips” mobile app, the guidelines page is displayed before proceeding to the booking steps. However, the user guidelines do not clearly specify the limits on service schedule and collection points, how to choose a suitable parking spot, or the maximum weight or dimension per bag of segregated waste. The lack of clarity and details in the user guidelines may lead to misunderstandings or inconvenience.

19. The Office recommends that EPD review and improve the content of both the user guidelines on the “HoHoSkips” mobile app and its website, adding important information for the attention of users to ensure correct and smooth use of the recycling service.

20. The Office is pleased to note that to reduce cancellations due to users' requests for waste collection within too short a time frame, the "HoHoSkips" mobile app has introduced a feature showing the earliest available time slot, allowing users to plan accordingly.

21. Furthermore, 51.7% of all cancellations in 2024 were initiated by users themselves, suggesting that many users might not have fully considered their needs before booking. After completing a booking via the "HoHoSkips" mobile app, users are only reminded of the consequences of cancelling it when they attempt to do so on the booking management page. Specifically, users might be barred by the system from booking the service again for three months if they cancel three consecutive bookings. The Office believes this rule is important information that should be included in the user guidelines for users to make informed decisions before booking. This will help reduce hasty bookings and subsequent cancellations.

(III) "Smart HoHoSkips" Self-service Recycling Scheme

Review and Expansion of the Service

22. To facilitate the use of recycling service without prior booking by members of the public and the minor works trade, EPD and the recycler launched the "Smart HoHoSkips" self-service recycling scheme in August 2024, with facilities set up at fixed locations for disposal of construction waste during their opening hours. Statistics show a steady increase in both the monthly quantity of construction waste collected and the usages of the "Smart HoHoSkips" service since its launch. Given the considerable support for this convenient service which is conducive to reducing illegal disposal of construction waste, it is worth continuing. As the "Smart HoHoSkips" scheme has been in operation for one year by July 2025, the Office recommends that EPD analyse and review the service, consolidate the experience and proactively explore the feasibility of expanding the service to other districts, especially where illegal disposal of construction waste is more prevalent. EPD should also analyse the data collected from the "HoHoSkips" scheme to identify which districts have a greater demand for the service and explore the feasibility of placing smart skips in those districts.

23. Moreover, EPD should consider temporarily placing smart skips near locations where more renovation works are expected, such as newly completed housing

estates, to provide a convenient option for disposing of construction waste upon move-in of residents. To this end, EPD should engage with the Hong Kong Housing Authority, the Hong Kong Housing Society, the Urban Renewal Authority, the Real Estate Developers Association of Hong Kong, the Construction Industry Council or major property management agents to explore the feasibility of such arrangements.

Information Dissemination via Mobile Application

24. At present, EPD uses infrared sensors to monitor the residual storage capacity of smart skips in real time, and publishes this information via the “Smart HoHoSkips” map on the “HoHoSkips” website. However, the “HoHoSkips” mobile app cannot effectively display this capacity information, nor does it clearly direct users to check such information on the website. This creates inconvenience for app users. The Office recommends that EPD improve the way this information is displayed on the mobile app, such that users can access it directly without switching between the app and the website.

25. During our direct investigation operation, we noted that both the “HoHoSkips” website and mobile app rarely issued any updates or notices. The Office considers it essential for the recycler to promptly announce any service-related changes via both website and mobile app to minimise disruption to users. We recommend that EPD remind and supervise the recycler to improve in this regard.

26. Separately, during this direct investigation operation, our staff repeatedly attempted to access the “HoHoSkips” map, the list of fixed collection points, and the “Smart HoHoSkips” map and service schedule via the mobile app, but all these pages only displayed “Files not found”. Although such information is available on the website, it is still inconvenient for mobile app users. EPD should rectify this issue.

Recommendations

27. In the light of the above, The Ombudsman recommends that EPD:

- (1) explore how to further strengthen its enforcement and evidence-gathering effectiveness, such as by making greater use of more advanced technologies to assist and optimise evidence collection, and flexibly deploying staff for targeted inspections and blitz operations, so as to improve prosecution rate and deterrence;

- (2) consider reinforcing patrols and surveillance in areas where offences are more likely to occur (such as in the vicinity of newly completed housing estates, and buildings and shops with renovation or repair works in progress) to achieve more targeted enforcement;
- (3) continue to strengthen publicity and education through various channels, raising awareness of environmental protection and compliance among the public and particularly the trade;
- (4) review the effectiveness of its promotion initiatives to ensure that the “HoHoSkips” scheme becomes more widely recognised among the trade and the public; consider enhancing promotion by distributing leaflets or displaying posters in areas where more minor works are expected (such as in the vicinity of newly completed housing estates) to encourage residents and renovators to use the “HoHoSkips” service;
- (5) review the effectiveness of the new feature of the “HoHoSkips” mobile app;
- (6) work with the recycler to explore feasible ways of shifting service demand from peak to off-peak times;
- (7) conduct timely review of the usage rate after the takeover of “HoHoSkips” service by a new recycler, and explore ways of better resource allocation to increase available service at peak times and minimise cancellations;
- (8) work with the recycler to shorten the average handling time per case (such as shortening the travel time per case by better route planning), so as to optimise the use of resources and accommodate more bookings; analyse the geographic distribution of past bookings, and consider offering collection service at fixed times and locations in districts with high demand;

- (9) closely monitor changes in the demand for “HoHoSkips” service; if demand continues to rise, consider increasing the number of collection vehicles and manpower to meet the growing demand, particularly the number of light goods vehicles that are easier to park by the roadside;
- (10) consider engaging with “HoHoSkips” users and the trade, or incorporate a feedback feature into the “HoHoSkips” mobile app to gather useful input for service improvement;
- (11) review and improve the content of both the user guidelines on the “HoHoSkips” mobile app and its website, adding important information for the attention of users (including the consequences of cancelling a booking) to minimise cancellations, as well as to ensure correct and smooth use of the recycling service;
- (12) analyse and review the “Smart HoHoSkips” service, consolidate the experience and proactively explore the feasibility of expanding the service to other districts; analyse the data collected from the “HoHoSkips” scheme to identify which districts have a greater demand for the service and explore the feasibility of placing smart skips in those districts;
- (13) engage with the Hong Kong Housing Authority, the Hong Kong Housing Society, the Urban Renewal Authority, the Real Estate Developers Association of Hong Kong, the Construction Industry Council or major property management agents to explore the feasibility of temporarily placing smart skips near locations where more renovation works are expected, such as newly completed housing estates;
- (14) improve the “HoHoSkips” mobile app to display the capacity information of smart skips, such that users can find the information without switching between the app and the website; ensure the normal operation of such features as the “HoHoSkips” map, the list of fixed collection points, and the “Smart HoHoSkips” service schedule; and

- (15) remind and supervise the recycler to promptly announce any service-related changes via both website and mobile app to minimise disruption to users.

Office of The Ombudsman

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