

申訴專員公署
Office of The Ombudsman



主動調查行動報告
Direct Investigation Operation Report

非法棄置建築廢物問題及「好好斗」回收服務
Illegal Disposal Problem and “HoHoSkiPs” Recycling Service
for Construction Waste

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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
September 2025

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1

INTRODUCTION

BACKGROUND

1.1 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. According to the report “Monitoring of Solid Waste in Hong Kong” for 2023 published by the Environmental Protection Department (“EPD”), the daily quantity of construction waste generated that year was as high as 46,000 tonnes. The Government encourages the construction industry (including building contractors, renovation contractors, renovation workers or persons-in-charge) to reduce and properly sort waste for reuse or recycling as far as possible, thereby saving costs and minimising the intakes at landfills. Under the Construction Waste Disposal Charging Scheme implemented since 2006, construction waste producers are required to pay for waste disposal and have a duty to dispose of waste properly. The scheme’s primary aim is to provide financial incentives to encourage the trade to reduce, sort, reuse and recycle at source, rather than disposing of construction waste at landfills.

1.2 To facilitate the proper disposal of waste generated from minor renovation projects by the public and small-to-medium renovators, EPD launched a pilot scheme in February 2021 for the collection and recycling of construction waste at the district level. Through the “HoHoSkips” mobile application 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.

1.3 Nevertheless, there are media reports and public complaints from time to time 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.

1.4 In addition to enforcement against illegal disposal of construction waste, EPD also has a responsibility to formulate practical measures to facilitate the lawful and proper disposal of construction waste by the public and the trade, and promoting recovery and recycling. The Office, therefore, considers it worthwhile to thoroughly examine EPD’s existing measures for tackling illegal disposal and recycling of construction waste. Against this background, The Ombudsman declared this direct investigation operation against EPD pursuant to section 7(1)(a)(ii) of The Ombudsman Ordinance on 26 November 2024.

SCOPE OF INVESTIGATION

1.5 This direct investigation operation covers the following issues of EPD:

- enforcement against illegal disposal of construction waste;
- operational arrangements of the “HoHoSkips” scheme and monitoring of its effectiveness, information dissemination, and promotion and publicity; and
- any areas for improvement.

PROCESS OF INVESTIGATION

1.6 On 26 November 2024, we announced the launch of this direct investigation operation and invited the public to submit their views.

1.7 On 26 June 2025, we issued a draft investigation report to EPD for comment, and received its reply on 23 July 2025. Upon considering and incorporating its comments as appropriate, we completed this final report on 10 September 2025.

2

DISPOSAL OF CONSTRUCTION WASTE

2.1 Surplus materials arising from site formation, excavation, building construction, renovation, refurbishment, demolition and roadworks are collectively referred to as construction waste, which are further categorised as either inert or non-inert. Over 90% of construction waste in Hong Kong consists of reusable inert materials, commonly known as public fill. Public fill includes construction debris, rubble, soil, concrete and asphalt, which are suitable for land reclamation and site formation. Following proper sorting, inert materials such as concrete and asphalt can be recycled and reused as construction materials. Non-inert materials such as bamboo, timber, vegetation, packaging waste and other organic matters are not suitable for land reclamation. After recovery and recycling of reusable items, any remaining waste is disposed of at landfills.

CONSTRUCTION WASTE MANAGEMENT STRATEGY

2.2 The Government has adopted a multipronged approach to manage construction waste generated from various types of building works. Its control encompasses three key aspects: reduction, reuse and recycling. For reduction, the Government requires the trade to optimise project planning, design and management to balance excavation and filling works¹, thereby reducing construction waste at source

¹ Earthworks is one of the principal components of construction works, encompassing all activities related to the excavation, filling, transportation of soil and rock, as well as drainage and dewatering. Filling refers to the construction process whereby soil is excavated (either manually or with machinery) and transported to a designated area (either the original excavation site or another fill location) to compact and reinforce the area. This procedure is commonly used for building foundations, land levelling, or land reclamation. Excavation refers to the construction process whereby soil is removed (either manually or with machinery) and transported to a designated area (either the original excavation site or another fill location). The purpose is to remove unwanted soil or to create depressions. Excavation is typically carried out for road construction, building foundations, site preparation, and tunnel excavation.

and alleviating pressure on existing public fill reception facilities. For reuse, the Government facilitates direct reuse of public fill for filling works and reclamation through project matching where possible. Surplus materials are transported to public fill reception facilities for temporary storage in accordance with the Waste Disposal (Designated Waste Disposal Facility) Regulation, pending future reuse. For recycling, the Civil Engineering and Development Department (“CEDD”) sorts public fill and recycles suitable hard materials into construction materials. Mixed construction waste is sent to sorting facilities or landfills for further processing or disposal.

CONSTRUCTION WASTE DISPOSAL CHARGING SCHEME

2.3 The Construction Waste Disposal Charging Scheme has been effective since 2006. Its primary objective is to provide financial incentives encouraging the trade to reduce construction waste at source, as well as to sort, reuse and recycle waste materials. Reusable inert materials are to be transported to public fill reception facilities for reuse in future projects. This helps reduce costs and optimises the use of landfill space.

2.4 Any producer of construction waste (such as building contractors, renovation contractors, property owners or construction waste recyclers) should first apply to EPD for opening a billing account under the Construction Waste Disposal Charging Scheme before using government waste disposal facilities. Through this account, persons or companies can pay charges and, where necessary, apply for valid chits to dispose of construction waste at public fill reception facilities, sorting facilities or landfills.

2.5 Pursuant to the Waste Disposal (Designated Waste Disposal Facility) Regulation, the four public fill reception facilities managed by CEDD² only accept construction waste consisting entirely of inert materials. These are temporarily stored for future use in reclamation, site formation or land filling. The two sorting facilities managed by CEDD³ accept construction waste containing more than 50% (by weight) of inert materials. After sorting, the inert portion is separated and sent to public fill reception facilities, and the remaining non-inert waste is transported to landfills. The

² The Tseung Kwan O Area 137 Fill Bank, the Tuen Mun Area 38 Fill Bank, the Chai Wan Public Fill Barging Point and the Mui Wo Temporary Public Fill Reception Facility.

³ The Tuen Mun Area 38 Temporary Construction Waste Sorting Facility and the Tseung Kwan O Area 137 Temporary Construction Waste Sorting Facility.

three landfills managed by EPD⁴ accept construction waste containing not more than 50% (by weight) of inert materials. The seven outlying islands transfer facilities managed by EPD accept construction waste containing any percentage of inert materials, which is then transported to the West New Territories Landfill for disposal.

2.6 Under the Construction Waste Disposal Charging Scheme, public fill reception facilities charge \$71 per tonne of public fill, sorting facilities charge \$175 per tonne of construction waste, and landfills charge \$200 per tonne of construction waste.

QUANTITY OF CONSTRUCTION WASTE

2.7 According to EPD’s data⁵, the overall construction waste generated in Hong Kong was 45,560 tonnes per day in 2023, decreased by around 4,300 tonnes or 8.6% compared to 2022. Of which, around 90% (i.e. 41,132 tonnes per day) was either directly reused through project matching, or temporarily stored at public fill reception facilities for future reuse. The disposal and reuse of overall construction waste between 2019 and 2024 are shown in **table 1** and **figure 1**.

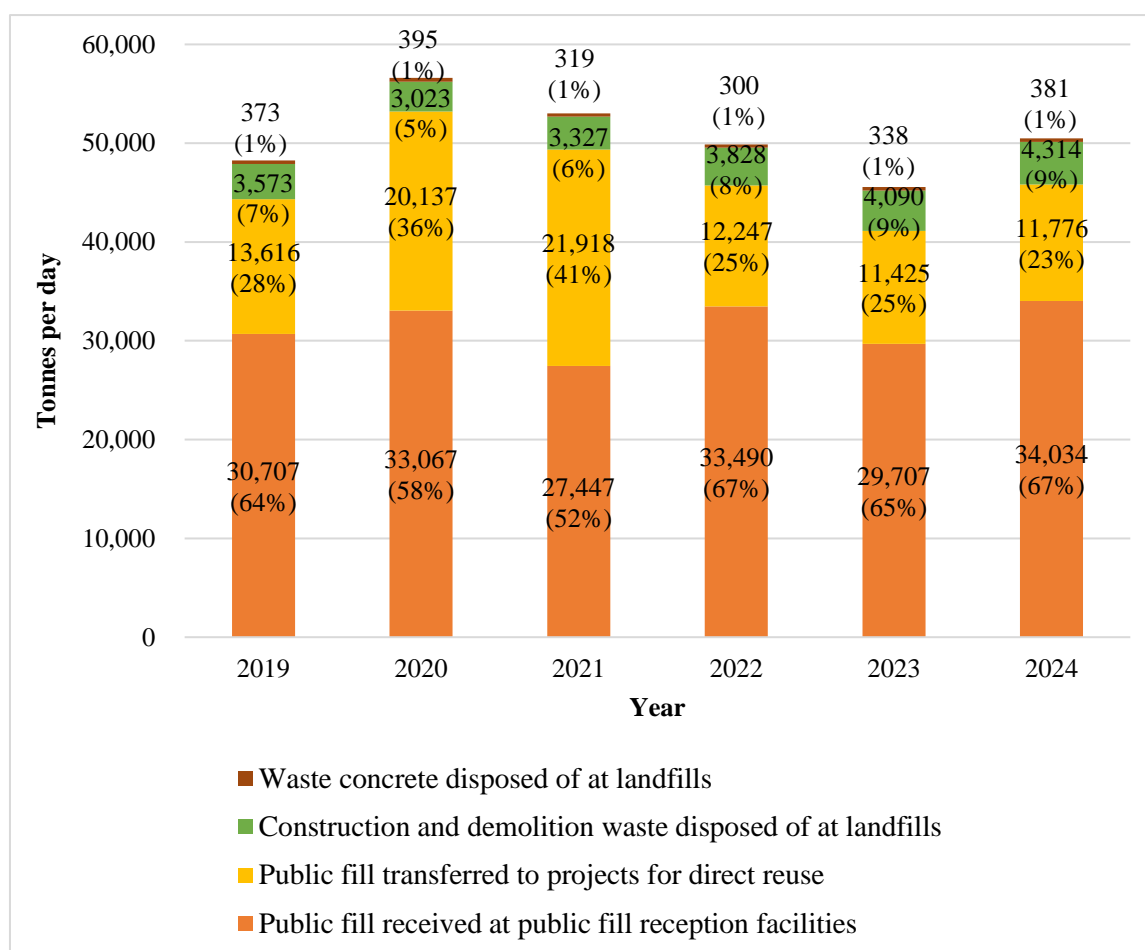
Table 1: Quantity of overall construction waste (2019–2024)

Year	2019	2020	2021	2022	2023	2024
Overall quantity (Tonnes per day)	48,269	56,622	53,011	49,865	45,560	50,505
Year-on-year change (%)	-2.7%	+17.3%	-6.4%	-5.9%	-8.6%	+10.9

⁴ The West New Territories Landfill, the North East New Territories Landfill, and the South East New Territories Landfill, including their extension areas.

⁵ See EPD’s “Monitoring of Solid Waste in Hong Kong – Waste Statistics for 2023”.

Figure 1: Disposal and reuse of overall construction waste (2019–2024)



2.8 In 2022, Hong Kong generated a total of 18.2 million tonnes of construction waste⁶, which is three times the quantity of municipal solid waste from domestic, commercial and industrial sources. Construction waste accounted for 75% of the combined total of construction and municipal solid waste in the territory, underscoring the importance of effective construction waste management.

2.9 Between 2019 and 2024, approximately 52% to 67% of construction waste was transferred to the four public fill reception facilities for temporary storage, pending future reuse in reclamation, site formation or land filling (see **fig. 1**). As shown in **table 2**, the quantity of stored fill dropped sharply during the reclamation works carried out between 2018 and 2020. However, following the completion of the airport’s third runway reclamation project in 2021, the stockpile rebounded significantly. In the absence of other major reclamation or land filling projects, the quantity of public fill stored in fill banks rose to a record high of nearly 23 million tonnes by March 2024.

⁶ According to the Statistical Highlights issued in September 2024 by the Legislative Council Secretariat’s Research Office.

**Table 2: Year-end quantity of public fill stored in
Tseung Kwan O and Tuen Mun fill banks
(2018–2024)**

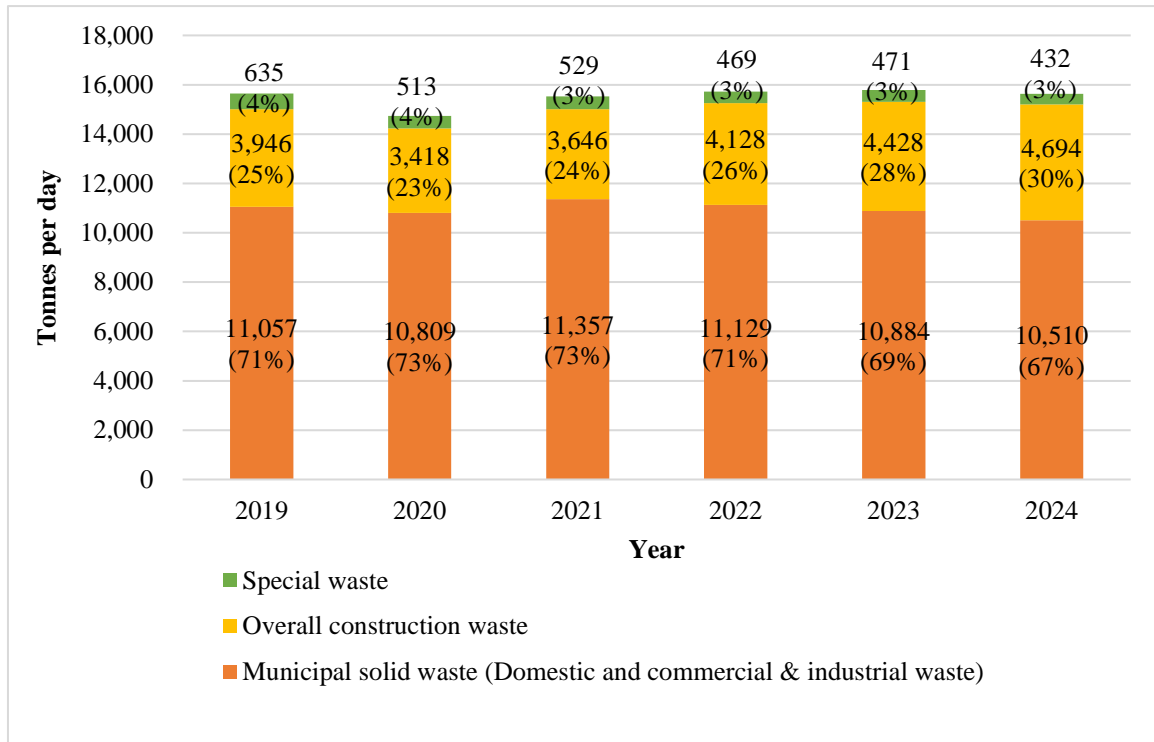
Year	Year-end quantity of public fill stored in local fill banks (Ten thousand tonnes)
	Overall quantity
2018	1,840
2019	920
2020	690
2021	1,040
2022	1,800
2023	2,290
2024	2,610

2.10 Since 2007, Hong Kong has entered into an agreement with the Mainland to transport surplus fill by sea to Taishan in western Guangdong for use in reclamation projects. As at March 2024, Hong Kong had delivered a cumulative total of 138 million tonnes of fill materials. With most of Hong Kong’s major reclamation projects now largely completed and existing fill banks nearing their storage capacity limits, an increasing quantity of surplus fill is expected to be transported to the Mainland for reuse.

2.11 Prior to the implementation of the Construction Waste Disposal Charging Scheme in 2006, landfills received approximately 6,500 tonnes of construction waste per day. Following the introduction of the scheme, this figure was nearly halved. However, according to EPD’s data⁷, the disposal of construction waste at landfills has been steadily rising in recent years, from 3,418 tonnes per day in 2020 to 4,428 tonnes per day in 2023. In 2023, construction waste sent to landfills per day increased by 300 tonnes or 7.3% compared to 2022. EPD believed that this increase was due to more local businesses ceasing operations or launching new ventures in 2023 compared to 2022, resulting in more construction waste generated by small-scale renovation or demolition works. The disposal of total solid waste at landfills per day between 2019 and 2024 is shown in **figure 2**.

⁷ See “Monitoring of Solid Waste in Hong Kong – Waste Statistics for 2023”.

Figure 2: Disposal of total solid waste at landfills per day (2019–2024)



Note: The quantity of special waste⁸ does not include special waste that has been treated or disposed of at other facilities.

2.12 Between 2019/20 and 2023/24, the Government spent around \$5.1 billion on management of public fill⁹. During the same period, around \$4 billion was collected from construction waste producers through public fill disposal charges, resulting in a shortfall of \$1.1 billion in the cost-recovery of fill management.

⁸ Special waste refers to waste that requires specific handling and disposal, including slaughterhouse waste, animal carcasses, asbestos, chemical waste, clinical waste, decommissioned goods, stabilised residues and incineration ash treated at chemical waste treatment centres, dredged mud and excavated materials, sludge generated from sewage and water treatment processes, incineration ash and residues from T·PARK, grease trap waste, livestock waste, screenings from sewage treatment plants, waste tyres, bottom ash and coal ash.

⁹ The expenditure mainly includes the operation and maintenance of public fill reception facilities, supply of public fill stockpiled in the fill banks to local projects for reuse, provision of required facilities for disposal of public fill at the disposal ground in the Mainland, delivery of surplus public fill to the Mainland, associated staff costs and administrative arrangement, etc.

3

ENFORCEMENT AGAINST ILLEGAL DISPOSAL OF CONSTRUCTION WASTE

3.1 EPD has adopted multipronged measures against illegal disposal of construction waste, including:

- (1) inter-departmental collaboration;
- (2) surveillance camera systems and drone fleet;
- (3) compilation of a list of priority sites for tackling fly-tipping;
- (4) regular patrolling;
- (5) complaint investigation; and
- (6) enforcement action.

INTER-DEPARTMENTAL COLLABORATION

3.2 EPD maintains close communication with relevant government departments and engages in inter-departmental collaboration—including information sharing, intelligence exchange and liaison meetings—to jointly monitor the overall situation of illegal waste disposal. Each department contributes within its own jurisdiction to combat the illegal disposal of construction waste. Between 2019 and the end of March 2025, EPD convened 11 inter-departmental meetings participated by the Agriculture,

Fisheries and Conservation Department, the Buildings Department, CEDD, the Drainage Services Department, the Food and Environmental Hygiene Department (“FEHD”), the Highways Department (“HyD”), the Home Affairs Department, the Lands Department (“LandsD”) and the Planning Department. During the same period, EPD also carried out 36 inter-departmental joint operations to tackle illegal disposal of construction waste.

SURVEILLANCE CAMERA SYSTEMS AND DRONE FLEET

3.3 Since 2016, EPD has gradually installed surveillance camera systems at locations where illegal disposal of construction waste occurs more frequently. These systems now cover approximately 250 sites and operate round the clock, automatically monitoring incidents of illegal waste disposal to support enforcement efforts. In light of the communication with members of District Councils and Rural Committees, EPD adjusts the surveillance locations as needed to improve prosecution rates.

3.4 EPD uses the video analytic functions of the surveillance systems to trace and prosecute offenders. It also analyses the patterns of illegal disposal for planning blitz operations.

3.5 Additionally, FEHD has installed network cameras at around 500 locations where illegal waste disposal occurs, including refuse collection points. EPD and FEHD determine the placement of surveillance systems based on their respective enforcement priorities. To enhance the effectiveness of combating illegal waste disposal, the two departments maintain close coordination and proactively communicate before installing surveillance systems to maximise impact. They also share a common mapping platform to view each other’s surveillance locations and exchange information captured by the systems to jointly address the issue.

LIST OF PRIORITY SITES FOR TACKLING FLY-TIPPING

3.6 Through inter-departmental coordination, EPD has compiled a list of priority sites for tackling fly-tipping (involving inert construction and demolition materials) (“priority sites”). The list is reviewed and updated every three to four months in collaboration with relevant departments to facilitate monitoring and follow-up. Priority sites are locations with more frequent or large-scale illegal disposal of

construction waste. As at March 2025, six of the nine priority sites were in Sham Shui Po and Yau Tsim Mong Districts.

3.7 Once a location is designated as a priority site, EPD staff will strengthen routine patrolling and promptly arrange for the installation of surveillance systems. Warning signs, banners and posters are also displayed nearby to enhance deterrence.

3.8 When considering whether to list a site, EPD takes into account such factors as the number of relevant complaints and reports received in the past year, the quantity of construction waste dumped, inspection results from various departments, etc. To delist a site, EPD generally follows a two-stage review process to confirm that situations have improved. First, the site will be placed on a watchlist after having no illegal cases or records involving construction waste disposal for three consecutive months. If such illegal cases and records are not found at the site for another three months by the next review, it can then be removed from the watchlist.

3.9 In parallel, EPD established a drone fleet in 2019 to conduct aerial surveillance of wide areas and hard-to-reach locations, such as remote rural areas in the New Territories. The use of drones enables EPD to gather intelligence on illegal activities more effectively and efficiently, supporting the planning of blitz patrols.

REGULAR PATROLLING

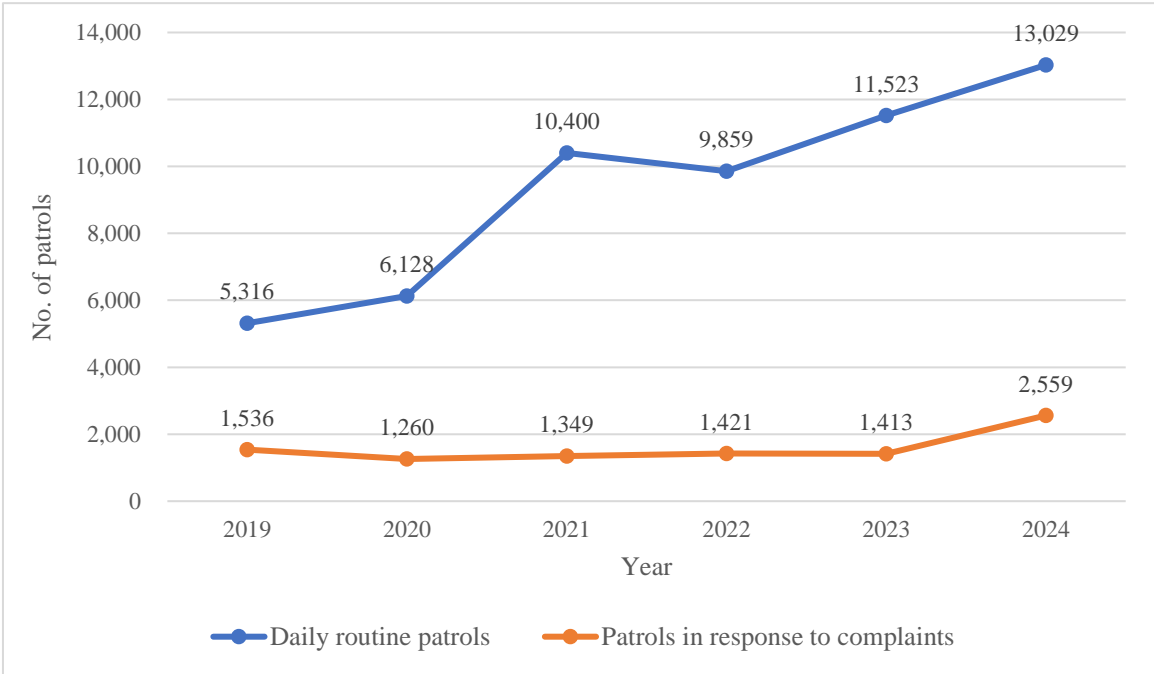
3.10 EPD's Environmental Compliance Division has 608 staff members responsible for enforcing various environmental regulations governing air, noise, water quality and waste pollution. The Division is also responsible for patrolling, licensing and handling public complaints. Division staff conduct daily routine patrols across all districts at locations where illegal disposal of construction waste occurs more frequently, monitoring the situations and taking enforcement action against offenders. EPD adjusts the frequency and timing of patrols based on the specific conditions of each location to optimise resource use. In 2024, for example, EPD staff carried out a total of 15,588 patrols targeting illegal disposal of construction waste, averaging over 40 patrols per day.

3.11 In addition, EPD staff strategically adjust patrol operations based on available data and intelligence, including information provided by complainants and illegal disposal patterns recorded by its surveillance systems. For example, scheduling

patrols and ambush operations outside regular office hours, including weekends and public holidays. In 2023, EPD conducted over 1,700 such operations outside office hours.

3.12 In recent years, EPD has increased the number of daily routine patrols from 5,316 in 2019 to 13,029 in 2024, more than doubling the figure (see **fig. 3**).

Figure 3: EPD’s patrols against illegal disposal of construction waste (2019–2024)



COMPLAINT INVESTIGATION

3.13 Upon receiving complaints about illegal disposal of construction waste, enforcement officers from the district offices of EPD’s Environmental Compliance Division will conduct investigations. In accordance with the departmental guidelines for handling pollution complaints, officers will promptly contact the complainant¹⁰ to obtain further details, including the specific location and time of waste disposal. Depending on the nature of the case, officers will carry out site inspections as soon as possible to investigate the situation and collect useful clues (such as the type and quantity of waste and its potential source) and analyse intelligence to plan blitz operations. If sufficient evidence is available, enforcement staff will instigate prosecution in accordance with departmental guidelines, including issuing court

¹⁰ According to EPD’s performance pledge, it aims to issue a preliminary reply within three working days after receiving a complaint in 95% of cases.

summons under the Waste Disposal Ordinance or the Public Cleansing and Prevention of Nuisances Regulation, or issuing fixed penalty notices under the Fixed Penalty (Public Cleanliness and Obstruction) Ordinance.

3.14 In addition, EPD staff will notify relevant departments, including HyD, FEHD and LandsD, to arrange for prompt clearance of the waste according to their respective responsibilities¹¹. If the case involves the purview of other departments, such as unlawful occupation and street obstruction, EPD will also refer the case to the appropriate authorities for follow-up.

3.15 According to EPD’s pollution complaint handling guidelines, it aims to respond within 15 working days to inform complainants of the actions taken or to be taken.

3.16 Between 2019 and 2024, the number of complaints about illegal disposal of construction waste received by EPD was approximately 7,700, which was relatively stable at between 1,100 and 1,500 cases per year. The number of cases confirmed by EPD to be illegal disposal of construction waste in recent years declined by 38% from 4,612 cases in 2022 to 2,841 cases in 2024. The figures of public complaints and illegal disposal cases confirmed by EPD are shown in **table 3** and **figure 4** respectively.

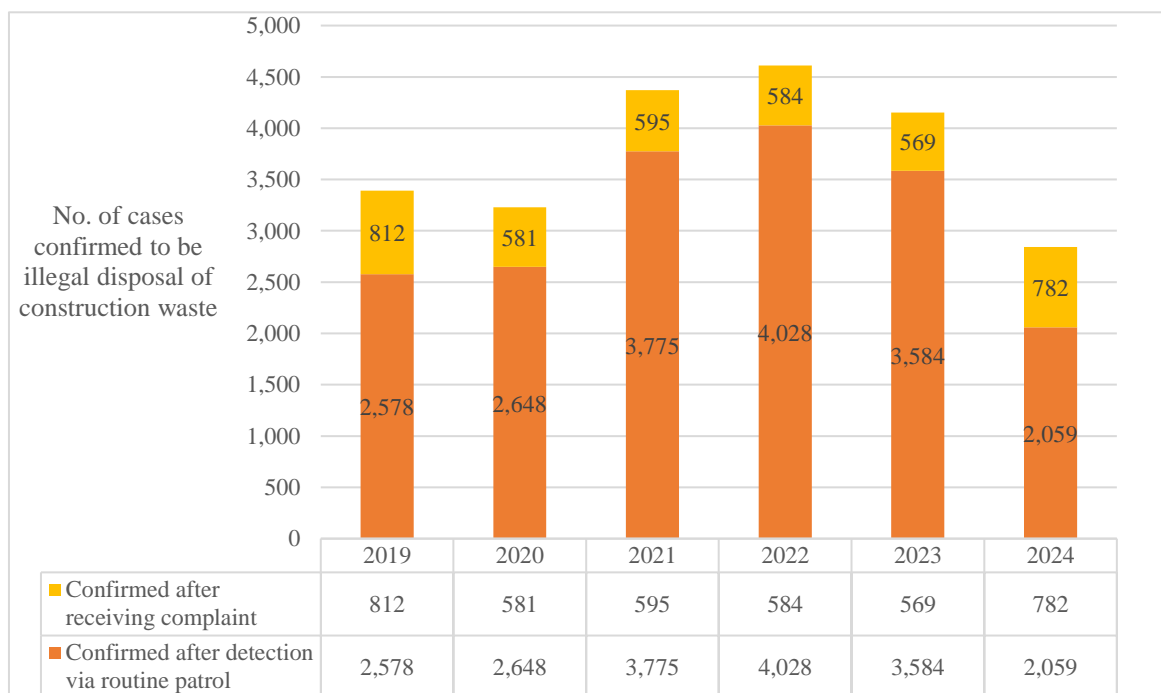
Table 3: Public complaints about illegal disposal of construction waste by district (2019–2024)

District	2019	2020	2021	2022	2023	2024	Total
Central & Western	67	49	54	46	66	82	364
Eastern	43	27	46	35	29	43	223
Southern	16	10	13	8	10	7	64
Wan Chai	79	32	30	38	46	53	278

¹¹ In January 2009, the then Environment Bureau issued the Circular Memorandum No. 1/2009 “Control of Depositing of Construction and Demolition Materials on Government Land and Private Land”, setting out the departmental responsibilities for better control of depositing of construction and demolition materials. With regard to government land, HyD is responsible for removing construction waste illegally dumped on public roads (including pedestrian walkways, public rear lanes and roadside slopes), and for implementing preventive measures such as fencing off black spots on such public roads following consultation with the Transport Department and LandsD. LandsD is responsible for removing construction waste illegally dumped on unallocated government land and may consider fencing off such land as appropriate. For government land under the control of other government departments, the respective departments are responsible for clearance operations. Meanwhile, FEHD is responsible for clearing domestic waste dumped in public places.

District	2019	2020	2021	2022	2023	2024	Total
Kowloon City	132	124	137	128	133	128	782
Kwun Tong	50	29	33	29	33	30	204
Sham Shui Po	201	155	113	106	110	110	795
Wong Tai Sin	34	12	19	17	29	23	134
Yau Tsim Mong	174	151	142	206	198	208	1,079
Islands	41	38	42	26	43	40	230
Kwai Tsing	64	42	40	36	30	46	258
North	106	101	112	54	100	127	600
Sai Kung	93	70	66	62	48	69	408
Sha Tin	57	68	51	44	43	50	313
Tai Po	77	78	75	53	61	66	410
Tsuen Wan	64	59	61	51	63	65	363
Tuen Mun	37	40	41	34	41	87	280
Yuen Long	163	145	134	120	208	133	903
Total	1,498	1,230	1,209	1,093	1,291	1,367	7,688

Figure 4: Illegal disposal cases confirmed by EPD (2019–2024)



3.17 As shown in **table 3**, over the past six years, public complaints about illegal disposal of construction waste were more prevalent in five districts: Kowloon City, Sham Shui Po, Yau Tsim Mong, North and Yuen Long. On the other hand, EPD’s data indicates a downward trend in the quantity of illegally dumped construction waste cleared by the Government across all districts. From a peak of approximately 9,000 tonnes in 2017, the figure dropped sharply by nearly 90% to around 1,000 tonnes in 2022 (see **fig. 5**). Subsequently, the quantity rose slightly by about 10% in 2024 to 1,089 tonnes. At the district level, the quantity of illegally dumped construction waste cleared by the Government from 2019 to 2023 also showed a clear downward trend, with a rebound observed in 2024 (see **table 4**). For example, in Sham Shui Po District, the quantity of illegally dumped construction waste cleared by the Government decreased steadily from nearly 920 tonnes in 2019 to 224.2 tonnes in 2023, before rising to 276.2 tonnes in 2024—still significantly lower than before.

Figure 5: Total quantity of illegally dumped construction waste cleared by the Government (Tonnes) (2017–2024)

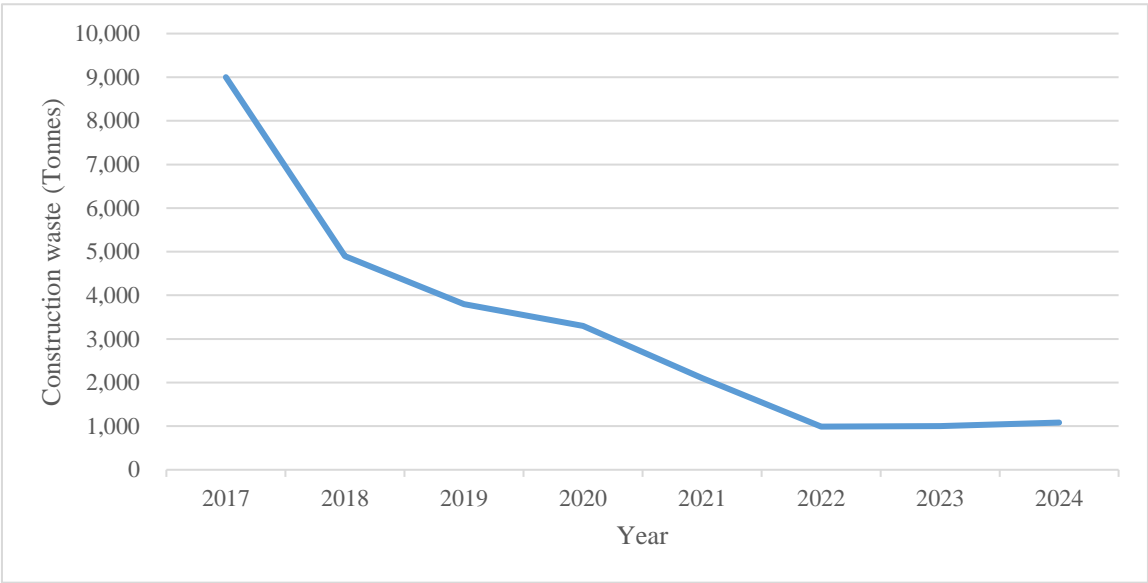


Table 4: Quantity of illegally dumped construction waste cleared by the Government in various districts (Tonnes) (2019–2024)

District	2019	2020	2021	2022	2023	2024	Total
Central & Western	37.1	37.7	14.2	18.6	14.9	4.2	126.7
Eastern	80.9	49.7	43.8	15.5	18.2	9.0	217.1
Southern	29.8	18.4	4.2	2.0	1.9	7.5	63.8
Wan Chai	58.7	18.4	5.7	1.7	0.6	0.0	85.1
Kowloon City	156.5	52.6	39.7	69.4	72.4	92.5	483.1
Kwun Tong	262.9	247.9	60.7	70.9	79.6	64.0	786
Sham Shui Po	918.1	875.0	687.0	238.9	224.2	276.2	3,219.4
Wong Tai Sin	359.6	81.2	47.9	120.7	50.3	37.8	697.5
Yau Tsim Mong	808.7	771.1	597.1	185.9	350.6	330.9	3,044.3
Islands	18.7	34.8	51.0	37.8	26.0	2.3	170.6
Kwai Tsing	153.3	241.3	68.9	54.5	37.9	22.1	578
North	33.3	74.5	13.4	2.9	6.0	49.3	179.4
Sai Kung	157.9	101.2	43.4	15.5	19.5	31.0	368.5
Sha Tin	249.4	398.6	256.6	39.6	34.2	46.8	1,025.2
Tai Po	229.5	119.7	52.2	25.4	15.7	14.5	457
Tsuen Wan	69.6	73.5	42.7	44.6	29.0	24.5	283.9
Tuen Mun	28.3	12.8	14.7	14.4	9.4	6.1	85.7
Yuen Long	152.0	111.0	75.9	33.3	21.7	70.6	464.5
Total	3,804.3	3,319.4	2,119.1	991.6	1,012.1	1,089.3	12,335.8

ENFORCEMENT ACTIONS

3.18 In 2023, the Government increased the fixed penalty from \$1,500 to \$6,000 for the offence of “unlawful depositing of waste” to strengthen the deterrent effect against the illegal disposal of large quantities of construction or other waste.

3.19 Between 2019 and 2024, the number of prosecutions instigated by EPD for illegal disposal of construction waste—by way of issuing summonses and fixed penalty notices—ranged from 65 to 129 cases (see **table 5**):

Table 5: Number of prosecution cases and penalties imposed by EPD related to illegal disposal of construction waste (2019–2024)

Year		2019	2020	2021	2022	2023	2024
Prosecution	No. of prosecution cases	88	59	67	49	30	26
	Successful prosecution	88	52	67	48	30	26
	Imprisonment	0	0	0	0	0	0
	Highest penalty	\$30,000	\$20,000	\$15,000	\$15,000	\$8,000	\$10,000
	Lowest penalty	\$1,500	\$1,500	\$1,500	\$1,500	\$2,000	\$1,500
	Average penalty	\$4,500	\$3,900	\$3,600	\$3,900	\$4,600	\$5,200
No. of fixed penalty notices issued		41	50	48	46	35	74
Total no. of cases		129	109	115	95	65	100

3.20 EPD explained that illegal disposal of construction waste typically takes place at surreptitious locations and during the small hours, with the dumping process being extremely brief, thus presenting considerable challenges for enforcement and prosecution. EPD staff must continuously collect and analyse relevant data and intelligence, and strategically carry out ambush operations to maximise effectiveness and deterrence. To support these efforts, EPD has installed surveillance camera systems at multiple locations where illegal disposal of construction waste occurs more frequently, making use of technology to assist enforcement (see **paras. 3.3 and 3.4**).

4

“HoHoSkips” SCHEME

4.1 Most minor works are constrained by limited site space. Hence, contractors or renovators responsible for such projects often need to arrange vehicles to transport small quantities of construction waste to government disposal facilities. This practice is not cost-effective in terms of transportation and is also unfavourable for the recycling and reuse of inert materials. To help the minor works and renovation trade address these challenges by providing an efficient collection service for construction waste and reduce illegal disposal at source, the Government launched in 2021 a pilot scheme for the collection and recycling of construction waste, which is funded by the Recycling Fund¹² and led by the trade. Using the mobile application “HoHoSkips”, members of the public and the minor works trade can book the recycler’s collection service under the pilot scheme and hand over construction waste generated from minor works near the renovation sites, saving them the trouble of transporting the waste to remote government disposal facilities.

SCHEME OVERVIEW

4.2 Since its launch in Sham Shui Po District in February 2021, the pilot scheme’s collection service for construction waste has gradually expanded. From December 2022 onwards, its service has largely covered all of Hong Kong (excluding

¹² To promote the sustainable development of the recycling industry, the then Chief Executive announced in the 2014 Policy Address the earmarking of \$1 billion to establish the Recycling Fund. The Recycling Fund was launched in October 2015 and received an additional allocation of \$1 billion from the Government in April 2021, with the application period extended to 2027. The Recycling Fund comprises two components, namely the Enterprise Support Programme and the Industry Support Programme. The former provides funding for individual Hong Kong recycling enterprises to enhance and expand their recycling operations within Hong Kong. The latter supports non-profit-distributing organisations registered in Hong Kong, such as professional bodies, trade and industrial organisations, research institutions and other industry support organisations, in undertaking non-profit projects to help the local recycling industry improve its operational standards and productivity in general or in specific areas.

outlying islands and remote areas)¹³. The Recycling Fund mainly subsidises the recycler’s transportation, equipment and administration costs based on actual operating expenses and project performance.

4.3 The Hong Kong Waste Association Limited (“the recycler”) is the non-profit organisation currently providing collection and recycling service under the pilot scheme. Its two projects funded by the Recycling Fund, namely the Urban Project and the New Territories Project, broadly cover construction waste collection and recycling across Hong Kong Island, Kowloon and the New Territories. The recycler appoints contractors through open tender to deliver collection and recycling service for these projects. The Advisory Committee on Recycling Fund has approved an extension of the service period for these projects until the end of 2025. EPD is currently reviewing the transition arrangements from existing to new “HoHoSkips” projects.

4.4 Each of the Urban and New Territories Projects has a designated vehicle depot, located respectively at the West Kowloon No. 1 Sewage Pumping Station in Sham Shui Po and the Chuk Yuen Floodwater Pumping Station in Yuen Long. In 2024, an auxiliary depot was added on Lai Po Road in West Kowloon to support the launch of the “Smart HoHoSkips” self-service recycling scheme and the trial use of electric vehicles for transportation. Each depot serves as a parking area for collection vehicles and houses a small office, and is also equipped with two skips for temporary storage and sorting of construction waste by recycling staff, such as removing nylon bags used for transportation and separating non-inert from inert materials. Once the skips reach a certain capacity, the waste is transported to government disposal facilities.

4.5 In terms of staffing, each project has one project manager responsible for daily operations; two collection vehicle drivers coordinating the collection and transportation of construction waste; and two recycling workers who manage depot operations and liaise on collection matters. Each project is supported by one demountable truck and one light goods vehicle. The working hours for drivers and recycling workers are Monday to Saturday, 9 a.m. to 6 p.m. (excluding public holidays).

¹³ After commencing in Sham Shui Po District on 26 February 2021, the pilot scheme expanded to Yuen Long, Sha Tin and Tai Po Districts on 15 July 2021; to Tsuen Wan, Kwai Tsing and Yau Tsim Mong Districts on 2 October 2021; to Kowloon City, Wong Tai Sin and North Districts on 1 December 2021; to Hong Kong Island, Kwun Tong, Tseung Kwan O and Tuen Mun Districts on 1 December 2022; and to Sai Kung District (covering Sai Kung Town Centre and southern areas) on 15 March 2023.

4.6 The Recycling Fund Secretariat regularly monitors the progress and outcomes of approved projects. The funding agreement requires the recycler to submit the projects’ monthly collection data and an annual report detailing latest project progress and performance. EPD and the Recycling Fund Secretariat oversee the recycler’s performance and submit its project management performance for evaluation by the Advisory Committee on Recycling Fund under the Recycling Fund’s established mechanism.

SERVICE OPERATIONS

4.7 Currently, members of the public and the renovation trade can book the recycler’s collection vehicle via the “HoHoSkips” mobile app to hand over small quantities of construction waste at locations near the renovation site suitable for short-term parking. If no such parking is available nearby, users can refer to the list of short-term parking spots (“fixed collection points”) in various districts on the pilot scheme’s website (www.hohoskips.hk) and the mobile app. The website also lists a fixed collection station located at the Chuk Yuen Floodwater Pumping Station in Yuen Long, where users can hand over construction waste to the recycler by appointment. For enquiries about using the app to book collection service, users may call the hotline provided in the app and on the website.

4.8 For example, in December 2023, there were 24 working days with service operating Monday to Saturday (excluding public holidays), and four collection vehicles were deployed that month. Based on operational experience, it takes around 1 hour and 15 minutes to complete a collection case. With 8 service hours per day (excluding lunch breaks), the fleet could theoretically arrange up to 25.6 collections per day¹⁴, or 614 collections in the entire month¹⁵. As it turned out, 460 collections were made that month, averaging 19.2 per working day. In other words, the fleet had capacity to handle around 33% more bookings.

4.9 In December 2024, again with 24 working days, the recycler arranged a total of 559 collections, averaging 23.3 per day. This means that “HoHoSkips” operated at around 91% of its theoretical maximum capacity that month¹⁶. The collection fleet and

¹⁴ 8 hours × 4 collection vehicles ÷ 1.25 hours per trip = 25.6 trips

¹⁵ 25.6 trips per day × 24 working days = 614 trips

¹⁶ 559 trips/614 trips × 100% = 91%

drivers are also responsible for transporting waste to public fill banks and landfills, assisting “HoHoSkips” sorting staff in processing and sorting collected construction waste, and other related tasks.

4.10 As at the end of April 2025, the “HoHoSkips” mobile app was downloaded over 46,000 times. By that time, there were approximately 26,600 registered users, of whom around 8,100 had booked collection service through the app, with 4,500 users having used the service more than once.

PUBLICITY AND PROMOTION

4.11 EPD has been promoting the “HoHoSkips” scheme to the public, renovation trade, property management companies and estate agencies through various channels. As at June 2025, EPD had conducted over 26,000 outreach visits, targeting sites with renovation in progress as well as contractors, property managers and members of the public. It also introduced the service to over 2,300 renovation contractors by phone. Promotional advertisements were placed in MTR train compartments and concourses; on the bodywork of KMB buses, public minibuses and trams; and at bus stops, major shopping centres, refuse collection points, roadside areas and recreational facilities. The service was also promoted via social media, online advertising, radio and TV announcements in the public interest, and lift lobby screens. Additional outreach was conducted through the networks of the Home Affairs Department, the Housing Department, the Hong Kong Housing Society, and the Property Management Services Authority, as well as the booths set up at major exhibitions.

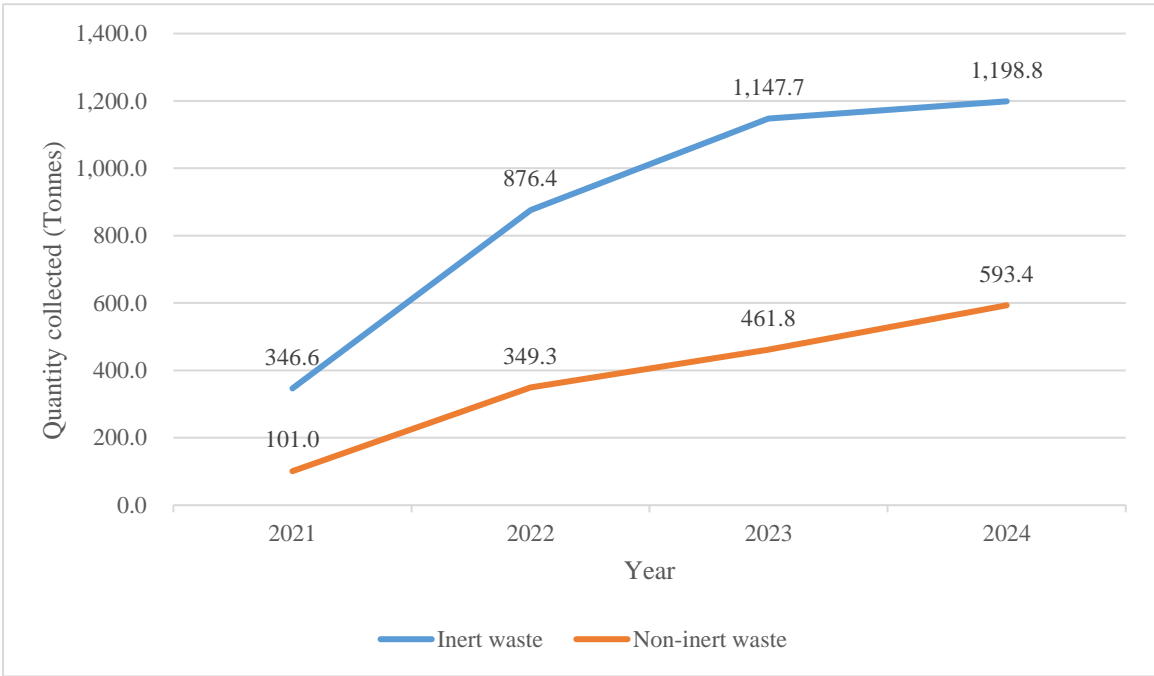
4.12 In August 2023, EPD co-hosted with the recycler a seminar for the renovation trade, introducing the background and details of the “HoHoSkips” scheme and the under planning “Smart HoHoSkips” self-service recycling of construction waste, and addressing participants’ questions. Throughout 2024 and 2025, EPD and the recycler promoted the “HoHoSkips” service directly via various platforms and events, including participation in the International Property Management and Procurement Expo and the “Build4Asia” exhibition. Regular promotion was also carried out through the Hong Kong Registered Contractors Association’s newsletters, the Property Management Services Authority’s website and member emails, and through outreach to members of the Federation of Hong Kong and Kowloon Labour Unions and the Hong Kong Construction and Decoration Workers Association.

SERVICE USAGE

4.13 To use the “HoHoSkips” collection service, members of the public or renovation trade must first submit a booking via the “HoHoSkips” mobile app. The recycler will respond to the user through the app and indicate whether the booking has been accepted, based on the availability of its collection fleet. Once the booking is confirmed, the recycler will arrange the collection service. If a booking is not accepted, the user may try an alternative time slot.

4.14 The total quantity of construction waste collected under the “HoHoSkips” scheme between 2021 and 2024 is shown in **figure 6**:

Figure 6: Total quantity of construction waste collected under the “HoHoSkips” scheme (2021–2024)

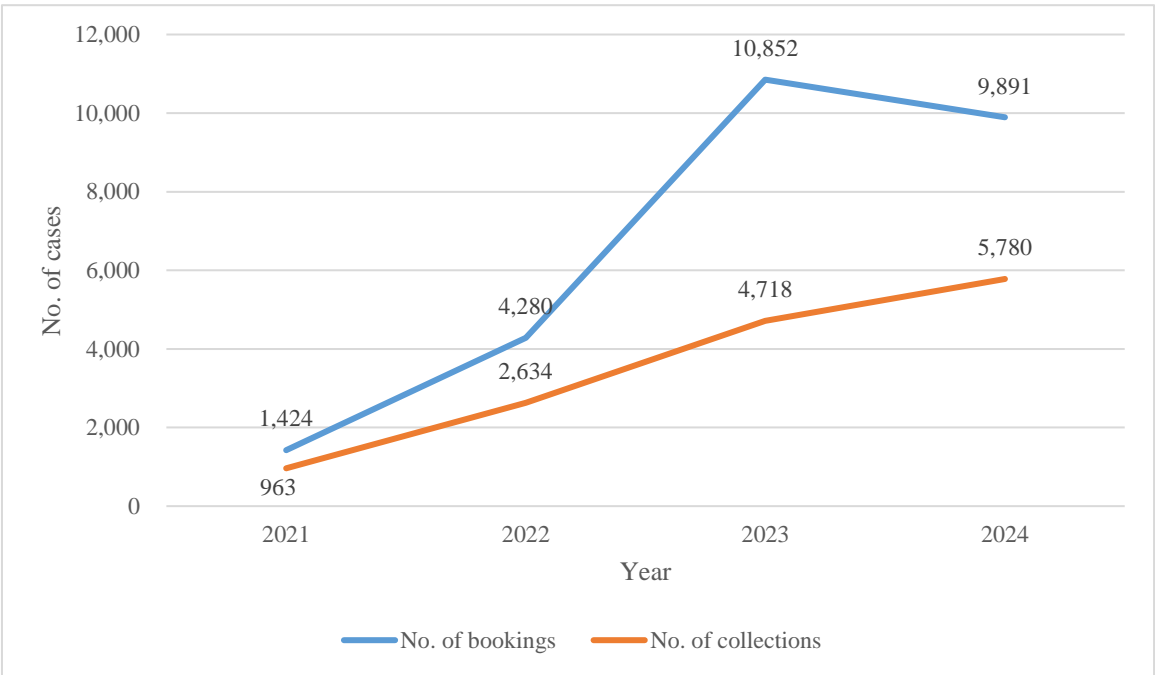


4.15 As noted in **paragraph 4.2** above, service coverage of the “HoHoSkips” scheme was limited to Sham Shui Po District in the first half of 2021, and gradually expanded to nine more districts in the second half of the year. It was not until December 2022 that the service could largely cover Hong Kong. The remaining seven districts—excluding outlying islands and remote areas—were covered by the scheme in December 2022. In Sai Kung District, initial coverage was limited to Tseung Kwan O, and only in March 2023 was the service extended to Sai Kung Town Centre and southern areas. As a result, the quantity of construction waste collected under the “HoHoSkips”

scheme increased progressively in line with its service expansion. According to **figure 6**, the quantities of construction waste collected under the scheme were approximately 1,226 tonnes in 2022, 1,610 tonnes in 2023 and 1,792 tonnes in 2024. These figures exceed the quantities of illegally dumped construction waste cleared by the Government in various districts during the same period—approximately 992 tonnes, 1,012 tonnes and 1,089 tonnes respectively (see **table 4**).

4.16 The number of bookings and collections under the “HoHoSkips” scheme between 2021 and 2024 is shown in **figure 7**:

Figure 7: Number of bookings and collections under the “HoHoSkips” scheme (2021–2024)



4.17 In 2023, there were a total of 295 working days¹⁷. Based on a maximum of 25.6 collections that can be provided by the recycler’s fleet per day (see **para. 4.8**), the recycler theoretically could have arranged up to 7,552 collections¹⁸ in 2023. However, according to the data provided by EPD, only 4,718 collections were actually made, resulting in a usage rate of just 62.5%. Given that 10,852 bookings were received that year, 56.3% of the bookings were cancelled (see **table 6**).

¹⁷ In 2023, there were 22 days (working days, as below) in January; 24 days in February; 27 days in March; 21 days in April; 25 days in May; 25 days in June; 25 days in July; 27 days in August; 25 days in September; 24 days in October; 26 days in November; and 24 days in December.

¹⁸ 25.6 trips per day × 295 working days = 7,552 trips

4.18 In 2024, there were 297 working days¹⁹. Based on the same assumption of a maximum of 25.6 collections per day (see **para. 4.8**), the recycler could have arranged up to 7,603 collections²⁰ in 2024. According to the data provided by EPD, 5,780 collections were actually made, resulting in a usage rate of 76%. Given that 9,891 bookings were received that year, 41.4% of the bookings were cancelled (see **table 6**).

4.19 EPD explained that bookings were cancelled due to cancellations initiated by users, non-collectable waste (e.g. not construction waste), adverse weather or vehicle incidents, requested locations not suitable for parking, user no-shows, service fully booked, etc. The reasons for booking cancellations between 2021 and 2024 are shown in **table 6**:

Table 6: Total number of “HoHoSkips” bookings and collections, and reasons for booking cancellations (2021–2024)

	Reason	No. of booking cancellations (Percentage of total no. of cancellations in that year)				
		2021	2022	2023	2024	Total
1	Initiated by users	228 (49.9%)	789 (47.9%)	1,786 (29.3%)	2,118 (51.7%)	4,921 (40.0%)
2	Request for collection within short time frame (2 hours)	162 (35.4%)	572 (34.7%)	1,383 (22.7%)	485 (11.8%)	2,602 (21.1%)
3	Service fully booked	12 (2.6%)	56 (3.4%)	1,699 (27.8%)	496 (12.1%)	2,263 (18.4%)
4	Duplicate booking	25 (5.5%)	120 (7.3%)	601 (9.8%)	538 (13.1%)	1,284 (10.4%)
5	Non-collectable waste	16 (3.5%)	29 (1.8%)	203 (3.3%)	230 (5.6%)	478 (3.9%)

¹⁹ In 2024, there were 26 days (working days, same below) in January; 22 days in February; 24 days in March; 24 days in April; 25 days in May; 24 days in June; 26 days in July; 27 days in August; 24 days in September; 25 days in October; 26 days in November; and 24 days in December.

²⁰ 25.6 trips per day × 297 working days = 7,603 trips

	Reason	No. of booking cancellations (Percentage of total no. of cancellations in that year)				
		2021	2022	2023	2024	Total
6	User no-show	4 (0.9%)	44 (2.7%)	89 (1.5%)	179 (4.4%)	316 (2.6%)
7	Requested location not suitable for parking	4 (0.9%)	21 (1.3%)	18 (0.3%)	16 (0.4%)	59 (0.5%)
8	Others (e.g. weather, incidents, etc.)	6 (1.3%)	16 (0.9%)	326 (5.3%)	36 (0.9%)	384 (3.1%)
Total no. of cancellations (Percentage of total no. of bookings in that year)		457 (32.1%)	1,647 (38.5%)	6,105 (56.3%)	4,098 (41.4%)	12,307 (46.5%)
Total no. of bookings		1,424	4,280	10,852	9,891	26,447
Total no. of collections		963	2,634	4,718	5,780	14,095

(Note: The figures for “total no. of bookings” and “total no. of collections” in the above table are annual data. The difference between the two does not exactly equal the “total no. of cancellations” for the year, as some bookings made at the end of the year were scheduled for service in the early part of the following year, resulting in minor discrepancies.)

4.20 As shown in the table, the cancellation rate rose steadily from 32.1% in 2021 to 56.3% in 2023—meaning more than half of all bookings were cancelled—before dropping to 41.4% in 2024. Between 2021 and 2024, the most common reason for cancellations was “initiated by users” (40%), followed by “request for collection within short time frame (two hours)” (21.1%) and “service fully booked” (18.4%).

4.21 EPD explained that user-initiated cancellations stemmed from various reasons, including incorrect submissions by new users during trial use, last-minute cancellations due to personal circumstances, changes in collection time or location due to personal needs, and users cancelling and rebooking for a different time or location upon contact by recycling staff. EPD has not maintained a breakdown of these

individual reasons. Furthermore, to facilitate and encourage the use of the “HoHoSkips” service, the recycler does not require users to pay in advance or provide a deposit when booking, nor does it impose penalties for cancellations without cause. EPD believed these may contribute to the ease with which users cancel bookings.

4.22 Regarding requests for collection within short time frame (two hours), EPD explained that the figure represents unsuccessful bookings where users asked for collection within two hours. Due to the limited size of the collection fleet, the recycler needs to accommodate as many bookings as possible based on the daily number of bookings and distribution of requested locations, and is occasionally unable to accept short-notice requests.

4.23 Regarding full booking, EPD noted that many users tend to request collection service during peak hours (particularly between 10–11 a.m. and 3–4 p.m.), resulting in demand exceeding supply during those time slots. Hence, the recycler has to cancel some of those bookings. The situation became more noticeable after the scheme expanded to cover most of Hong Kong in December 2022 with more users. As shown in **table 6**, cancellations due to demand exceeding supply during peak hours rose sharply from 2.6% of all cancelled bookings in 2021 to 27.8% in 2023, before falling to 12.1% in 2024. Meanwhile, the usage rate of the recycler’s collection service increased from 62.5% in 2023 (see **para. 4.17**) to 76% in 2024 (see **para. 4.18**).

IMPROVEMENTS TO “HOHOSKIPS” SCHEME

4.24 Following the launch of our investigation, EPD reviewed the “HoHoSkips” scheme and implemented targeted upgrades to the mobile app in August 2024 to reduce booking cancellations. EPD pointed out that these upgrades help distribute bookings more evenly throughout the day, especially away from peak times, allowing users to better align with the scheme’s operations and optimising the use of the overall collection capacity. The upgrades include:

- (1) To reduce cancellations caused by short-notice requests, a “minimum booking lead time” feature was introduced, giving the recycler sufficient time to arrange collection of waste.
- (2) To reduce cancellations due to service fully booked, a “maximum number of bookings per time slot” feature was introduced, allowing

users to view which time slots are fully booked to prevent having too many bookings within certain slots, while displaying other available slots for consideration.

- (3) To reduce cancellations caused by duplicate submissions, a “daily maximum booking limit per user” feature was introduced to prevent excessive bookings and minimise duplication.

“SMART HOHOSKIPS” SELF-SERVICE RECYCLING

4.25 To maximise recycling efficiency with limited resources, EPD and the recycler piloted the “Smart HoHoSkips” self-service recycling scheme in December 2023 and officially launched it in late August 2024. The scheme provides smart skips equipped with a display interface and payment system. Through an electronic screen, users are guided to weigh their construction waste by category and then deposit it into designated compartments for inert or non-inert materials, followed by payment. Users can bring construction waste to the locations of “Smart HoHoSkips” during operating hours without prior booking of a collection time. Currently, there are only two “Smart HoHoSkips” facilities in Hong Kong, both located in Kwai Chung. The smart skip near Lai Po Road and Hing Wah Street West operates Monday to Saturday from 9:30 a.m. to 5:30 p.m.; the one at Kwong Fai Lane, Kwong Fai Circuit operates on Monday, Wednesday and Friday from 10:30 a.m. to 4:30 p.m.

4.26 The monthly collection quantity of the “Smart HoHoSkips” service from late August 2024 to March 2025 is shown in **table 7**:

**Table 7: Monthly collection quantity under the “Smart HoHoSkips” scheme
(From late August 2024 to May 2025)**

Month/Year	No. of collections	Quantity collected (Tonnes)
August 2024	10	1.3
September 2024	82	12.8
October 2024	65	14.1
November 2024	96	14.5
December 2024	116	17.5

Month/Year	No. of collections	Quantity collected (Tonnes)
January 2025	112	14.6
February 2025 ²¹	53	7.8
March 2025	106	11.9
April 2025	122	16.8
May 2025	102	14.9
Total	864	126.2

CONCLUDING REMARKS

4.27 EPD considered that the “HoHoSkips” scheme requires users—both the public and the minor works trade—to pre-sort waste and book collection times and locations, which involves behavioural and habitual changes. Time is needed for users to adapt. Through ongoing promotional efforts via various channels, the total quantity of construction waste collected (including inert and non-inert materials) and the number of collections made under the scheme rose from 447 tonnes and 963 collections in 2021 to 1,792 tonnes and 5,780 collections in 2024 (see **figs. 6 and 7**).

4.28 EPD noted that the quantity of construction waste collected under the “HoHoSkips” scheme in 2023 and 2024 (see **fig. 6**) exceeded the total quantity of illegally dumped construction waste cleared by relevant departments in the relevant districts during those years (see **table 4**). In Sham Shui Po District, where illegal disposal was previously more rampant, the quantity cleared by HyD fell by 60% from 687 tonnes in 2021 to 276.2 tonnes in 2024 (see **table 4**), indicating that the “HoHoSkips” scheme was conducive to addressing the problem. By the end of 2024, the scheme had handled a total of 5,075 tonnes of construction waste, of which 3,570 tonnes (over 70%) were sorted and sent to public fill banks for reuse.

²¹ From 20 January to 10 February 2025, the smart skip on Lai Po Road was out of service due to maintenance. Moreover, the first day of the Lunar New Year in 2025 fell on 29 January, with the renovation trade typically resuming operations later following the Lunar New Year holiday period. Consequently, the number of collections and the quantity of construction waste collected by the “Smart HoHoSkips” service decreased during January and February 2025.

5

SITE INSPECTIONS

5.1 To gain a deeper understanding of the operations of the “HoHoSkips” scheme and the “Smart HoHoSkips” self-service recycling scheme, our staff conducted site inspections in October 2024 to observe how users disposed of construction waste via the schemes. In October 2024 and March 2025, our staff also shadowed EPD staff’s follow-up on illegal disposal complaints and ambush operations. Furthermore, our staff visited Sham Shui Po District, a fly-tipping black spot district, in early April 2025 to assess the current situation in the area.

USE OF “HOHOSKIPS” SCHEME

5.2 On 7 October 2024, accompanied by EPD staff, our staff observed the recycler’s staff collecting construction waste at a residential estate in Ma On Shan. The scheduled time was 1:30 p.m., and the demountable truck arrived at 1:38 p.m., staffed by one driver and one recycling worker (see **fig. 8**). The user loaded bags of segregated construction waste onto the tail lift of the truck. Noting that each bag of waste was too heavy, the recycling worker advised that the bags should be half-filled only to prevent accidents or spillage during handling. Moreover, several plastic bottles—classified as non-inert waste—were found mixed in the bags. Despite these issues, the driver accepted the waste and reminded the user to be more careful next time. After the user had finished loading, the tail lift malfunctioned and could not move up and down (see **fig. 9**). After attempting several times but to avail, the driver said that he would contact the recycler to arrange for repairs and might need to cancel subsequent bookings. The driver visually estimated the weight of the waste, and the user agreed to pay accordingly. The entire procedures took around 30 minutes. Afterwards, EPD staff informed us that shortly after our staff’s departure, the tail lift resumed functioning. The actual weight obtained after measurement differed by less than one dollar from the driver’s estimate, and the driver refunded the difference to the user before proceeding to the next scheduled collection.

Figure 8



Figure 9



5.3 Accompanied by EPD staff, our staff conducted another site inspection on 14 October 2024 to observe a “HoHoSkips” collection of construction waste at another residential estate in Ma On Shan. The scheduled time was 1:30 p.m., and the demountable truck arrived at approximately 1:27 p.m., staffed by one driver and one recycling worker. The user loaded the construction waste, bag by bag, onto the truck’s tail lift—a process that took around ten minutes (see **figs. 10 and 11**). At 1:43 p.m., the driver collected the payment from the user after weighing out the waste, and then drove off. The entire procedures took around 16 minutes.

Figure 10



Figure 11



5.4 On 19 March 2025, our staff attempted to book collection service via the “HoHoSkips” mobile app. Upon entering the app, the interface displayed options for “Scheduled Collection” (i.e. “HoHoSkips”) and “Self-service Recycling” (i.e. “Smart HoHoSkips”) (see **fig. 12**). Users could tap on “Information on Scheduled Collection” and “Information on Self-service Recycling” to view details about each scheme (see **figs. 13 and 14**). However, between November 2024 and June 2025, our staff repeatedly attempted to access the “HoHoSkips” map²², the list of fixed collection

²² The “HoHoSkips” map displays a map of Hong Kong, showing all fixed collection points and the locations of collection vehicles.

points, and the “Smart HoHoSkips” map²³ and service schedule, but all these app pages only displayed “Files not found” (see **fig. 15**). EPD responded that the error was likely an isolated incident, possibly caused by server instability or other technical issues, and that no similar problems had been detected since. Nevertheless, EPD has planned to redevelop the next-generation “HoHoSkips” mobile app upon the launch of new projects, with a view to improving the app’s stability and design.

5.5 After selecting “Scheduled Collection”, the app first displayed the guidelines for users, which users must acknowledge by tapping “I understand” before proceeding to the booking steps. We noted that the guidelines (see **figs. 16 and 17**) included “put loose or fragmented construction waste in bags, which must be tied securely before using the service”; “divide the construction waste into as many bags as possible for easy handling if it is heavy”; and “for each service transaction, no more than half the volume of a skip (around 40 bags or 1 tonne) is accepted”. However, the guidelines did not clearly specify the maximum weight or dimension allowed per bag of construction waste. This lack of clarity might result in incorrect use of the service. A case in point is in **paragraph 5.2**, where the user was only informed at the time of collection that the bags of segregated waste were too heavy.

Figure 12



Figure 13



²³ The “Smart HoHoSkips” map displays a map of Hong Kong, showing the locations of two smart skips and their service status (more space, in service, nearly full, full/maintenance).

Figure 14



Figure 15



Figure 16

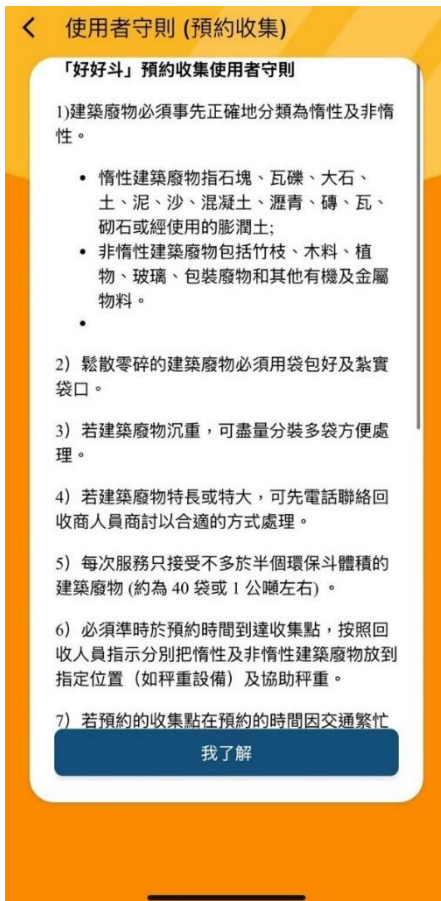
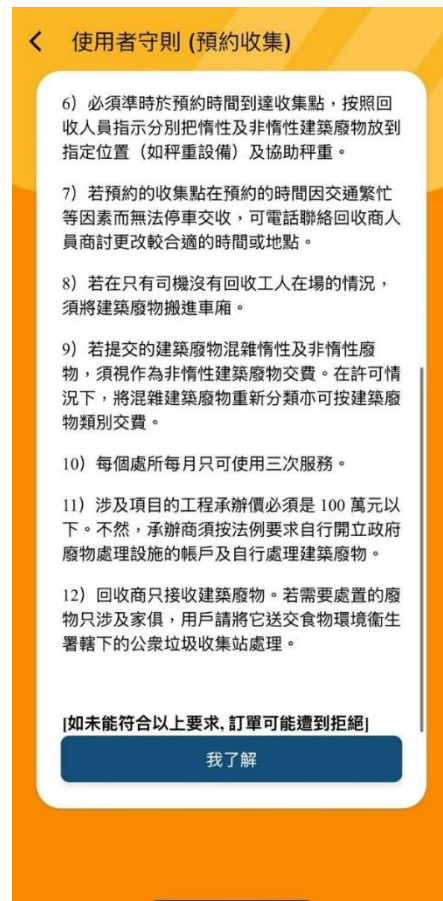


Figure 17



5.6 The first step in the booking process via the mobile app was to input the renovation address (see **fig. 18**). The system would then display the locations of fixed collection points. If no suitable collection points are available near the renovation site, users might select a custom collection point (see **fig. 19**). Next, users must select an available service date and time (see **figs. 20 and 21**). After that, users were required to input the number of bags of construction waste to be disposed of, categorised by type. They might also provide supplementary information via photos or voice recordings (see **figs. 22 and 23**). Once the relevant guidelines were confirmed, users could tap “Confirm Booking” and await a response from the recycler indicating whether the booking has been accepted (see **figs. 24 and 25**). Users could check the status of booking on the app’s interface (see **fig. 26**). The page included an option to cancel the booking (see **fig. 27**). Upon cancellation, users must choose a reason, and the system would display a warning that users might be barred by the system from booking the service again for three months if they cancel three consecutive bookings (see **figs. 28 and 29**).

Figure 18



Figure 19

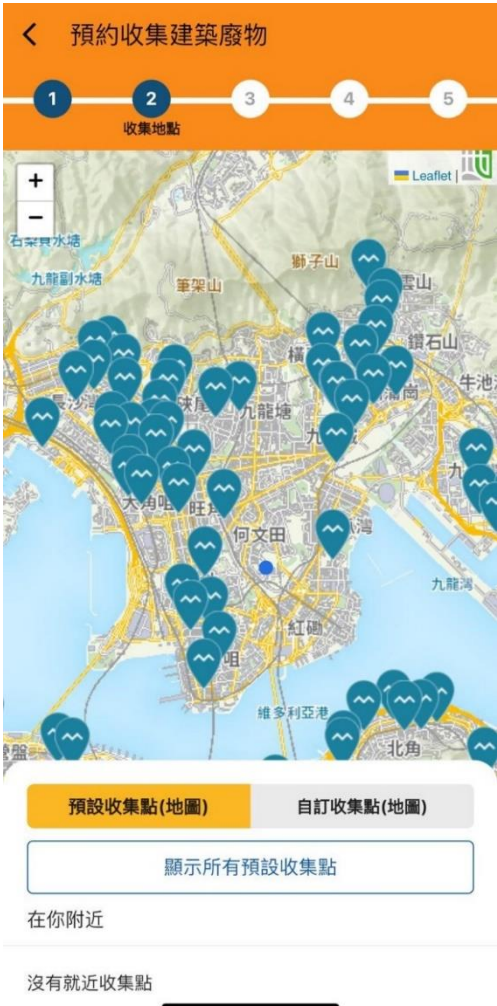


Figure 20



Figure 21



Figure 22



Figure 23



Figure 24

預約收集建築廢物

1 2 3 4 5 確認訂單

收集地點: _____

日期: 2025年03月24日

時間: 10:30

預計數量: 5袋惰性 0袋非惰性

用戶建議的汽車: 客貨車

預計處理費: \$0.0

預計總收費
~ \$11 - \$12

須以「八達通」付費。

此預計收費是根據你輸入的預計數量計算，實際的費用以收集的廢物重量計算。

計算方法為每噸惰性廢物 \$71，每噸非惰性廢物 \$200 (1公噸=1000公斤)。

請確認守則

- 輸入的裝修地址為真確無誤
- 涉及項目的工程承辦價必須是100萬元以下
- 已經閱讀並遵守使用者守則 (預約收集)

確認預約

Figure 25

預約收集建築廢物

你已提交預約申請
訂單編號: E939

查看訂單

返回主頁

- 這預約申請尚未被回收商接納。回收商會盡快回覆申請結果。
- 前往收集地點前請先確定該申請是否已被接納。
- 如有疑問，請直接聯絡回收商。

Figure 26

好好斗 HoHoSkips

預約收集 自助回收

訂單狀態 瀏覽全部

預約收集

E939 ●申請處理中

預約
03月24日 10:30
裝修地址

預約收集的資料

自助回收的資料

Figure 27

你的訂單

E939

收集日期與時間:
03月24日 10:30

收集地點: _____

預計收費:
~\$11 - \$12

用戶編號:
電話:
裝修地址:

預計數量 (袋): 5.0x惰性 0x非惰性

用戶建議的汽車: 客貨車

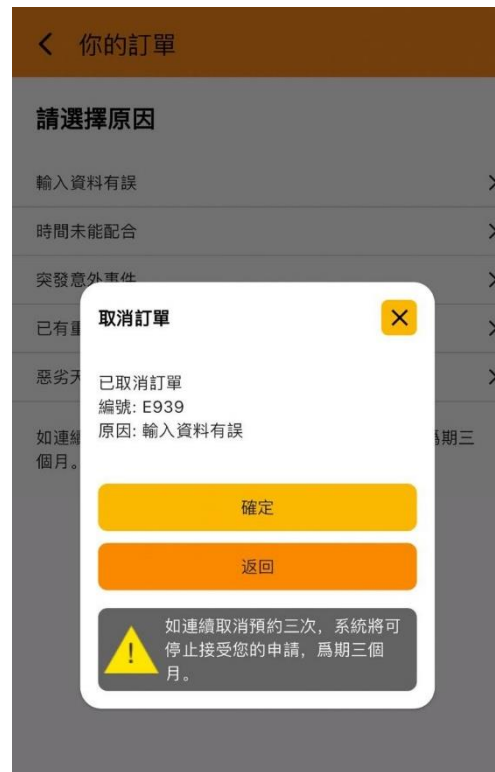
預計處理費: \$0.0

取消訂單
(你不能取消當天預約)

Figure 28



Figure 29



“SMART HOHOSKIPS” SELF-SERVICE RECYCLING

5.7 On 7 October 2024, accompanied by EPD staff, our staff conducted a midday site inspection at the smart skip located at Kwong Fai Lane, Kwong Fai Circuit, Kwai Chung. Upon our arrival, two users were already on-site with several dozen bags of segregated construction waste placed beside the smart skip, preparing to use the service (see **fig. 30**). To begin, users must first apply for “Self-service Recycling” via the “HoHoSkips” mobile app and receive a QR code. Following the instructions displayed on the smart skip’s interface, users scan the QR code using their mobile phones to activate the service (see **figs. 31 and 32**) and unlock the storage compartment. Users are then guided to weigh and deposit their bags of inert construction waste into the designated inert waste compartment (see **fig. 33**). Due to the relatively small surface area of the weighing scale, users had to weigh small amounts of waste multiple times. Next, they weighed and deposited non-inert construction waste into the corresponding compartment (see **figs. 34 and 35**). After depositing all waste into the appropriate compartments and securely closing the doors, users proceeded to payment (see **fig. 36**).

Figure 30



Figure 31



Figure 32



Figure 33



Figure 34



Figure 35



Figure 36



5.8 Later, two other members of the public arrived by car to use the smart skip. According to our observations, it appeared to be their first time using the service, yet they had no difficulty following the on-screen instructions. However, as the smart skip was located on a pedestrian pathway some distance from the roadside, they had to go back and forth several times to transport all the bags of construction waste between their car and the weighing scale (see **fig. 37**). Regarding whether the system might reset if users are occupied with transporting waste and unable to operate it promptly, EPD staff

explained that the system only resets after being left idle for more than 20 minutes. If necessary, EPD can adjust this feature based on actual usage patterns and user feedback.

Figure 37



5.9 Our staff also noted that several surveillance cameras were installed both inside and outside the storage compartments for EPD to monitor the status of the smart skip in real time (see **fig. 38**), thereby enhancing surveillance and preventing improper waste disposal. If anyone fails to follow the disposal guidelines, such as placing non-inert construction waste into the inert waste compartment or leaving without payment, EPD staff can review the video footage to identify the user involved. A reminder can then be issued via the user’s “HoHoSkips” account, urging them to use the service in accordance with the guidelines and instructions. Our staff also found user guidelines, promotional leaflets and a QR code next to the smart skip’s electronic screen. Users can scan the QR code to view an instructional video explaining how to operate the smart skip (see **figs. 39 and 40**).

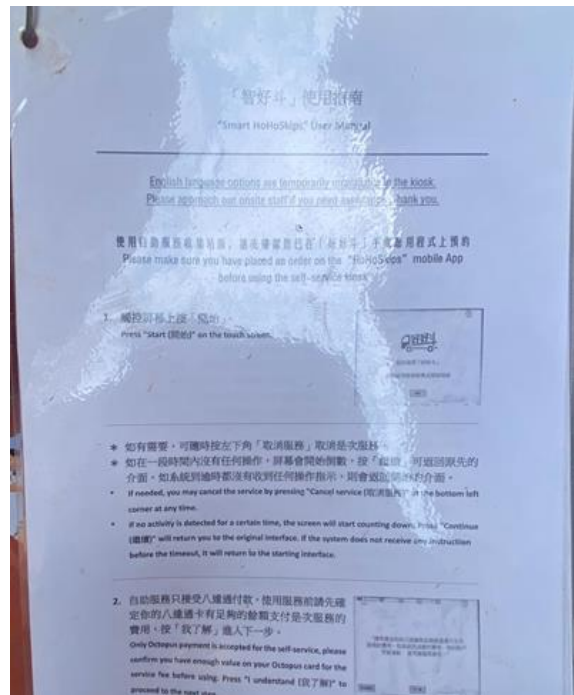
Figure 38



Figure 39



Figure 40



5.10 During the site inspection, EPD staff informed our staff that the recycler transports the smart skip to the recycling depot at the end of each service day to process the collected construction waste, and returns the smart skip to the same location on the morning of the next service day. However, even if the storage compartment reaches full capacity before the end of service hours, the recycler will not retrieve the smart skip early. Each smart skip is equipped with infrared sensors to measure its residual storage capacity, which is published in real time via the website’s “Smart HoHoSkips” map (namely “more space”, “in service”, “nearly full” or “full/maintenance”) for users to check the available capacity before visiting the facility. However, on the day of site inspection, both on the spot and shortly afterwards, our staff were unable to view this information on the website (see **fig. 41**). EPD later updated the website, and users can now check the storage capacity of smart skips online (see **fig. 42**). This information is also available via the “HoHoSkips” mobile app on the “Smart HoHoSkips” map (App Homepage > Information on Self-service Recycling > “Smart HoHoSkips” map).

Figure 41



Figure 42



5.11 On 19 March 2025, our staff attempted to book the “Smart HoHoSkips” service via the “HoHoSkips” mobile app. After inputting the renovation address and the type and quantity of construction waste to be disposed of, the booking was confirmed (see **fig. 43**), and a registration number along with a QR code to activate the smart skip was received (see **fig. 44**). The booking status and QR code were displayed on the app interface (see **figs. 45 and 46**), which also included a cancellation option. If selected, the app would prompt the user to choose a cancellation reason and display a warning that users might be barred by the system from booking the service again for three months if they cancel three consecutive bookings (see **fig. 47**).

Figure 43



Figure 44



Figure 45



Figure 46



Figure 47

The screenshot shows a mobile application interface with an orange header bar containing a back arrow and the text '你的訂單'. Below the header is a section titled '請選擇原因' (Please select a reason). This section contains a list of five options, each with a right-pointing chevron: '輸入資料有誤' (Incorrect input information), '時間未能配合' (Time cannot be coordinated), '突發意外事件' (Sudden unexpected event), '已有重複訂單' (Already has a duplicate order), and '惡劣天氣不宜交收' (Bad weather is not suitable for delivery). At the bottom of the list is a note: '如連續取消登記三次，系統將可停止接受您的申請，為期三個月。' (If you cancel registration three times in a row, the system will stop accepting your application for three months).

FOLLOW-UP ON ILLEGAL DISPOSAL OF CONSTRUCTION WASTE

Complaint Case in Prince Edward

5.12 In early September 2024, EPD received a public complaint via the 1823 hotline regarding illegal disposal of construction waste on a pedestrian pathway in Prince Edward. EPD staff subsequently inspected the site and investigated potential persons or shops responsible for the disposal, but to no avail. EPD then requested HyD to clear the construction waste. In total, EPD conducted six follow-up patrols for this case to monitor whether further illegal disposal occurred at the same location.

5.13 On 14 October 2024, our staff shadowed EPD staff from the Mong Kok office of its Regional Office on one of the follow-up patrols related to this complaint. Two plain-clothes EPD officers patrolled the vicinity but found no illegal activities. As EPD was unable to identify any offenders after multiple follow-up patrols, the case was closed. EPD staff noted that the follow-up actions depend on the manpower resources of each regional office, as well as the number and complexity of cases.

Ambush Operation in San Po Kong

5.14 On 14 October 2024, our staff shadowed EPD staff conducting an ambush operation in San Po Kong. No offenders were caught during the operation, but construction waste was found illegally dumped on a pedestrian pathway. EPD staff documented and photographed the scene.

5.15 During the operation, EPD staff informed us that surveillance cameras had been installed on street lamps in the vicinity (see **fig. 48**) to monitor illegal disposal of construction waste. Warning banners were also displayed on nearby railings to alert the public that surveillance systems were in place (see **figs. 49 to 50**). EPD stated that ambush operations targeting black spots are carried out based on available manpower and factors such as the timing and location of illegal activities.

Figure 48



Figure 49



Figure 50



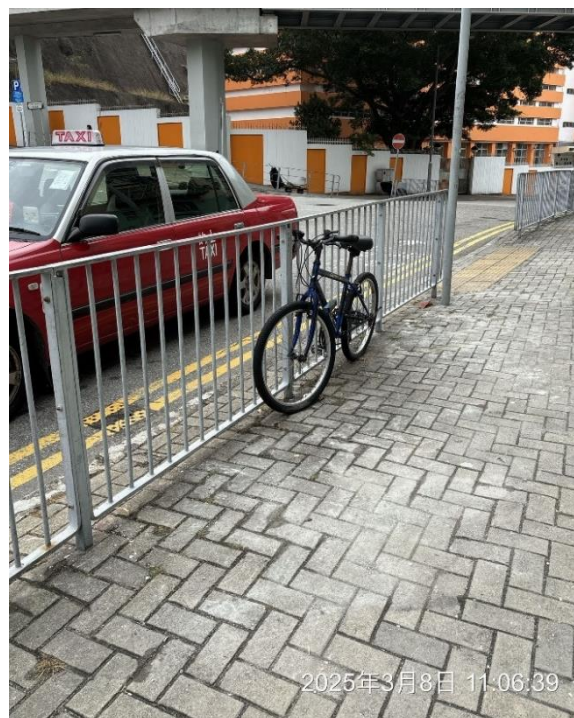
EPD's Follow-up on a New Complaint

5.16 In the guise of an ordinary member of the public, our staff lodged a complaint on 6 March 2025 via the 1823 hotline about construction waste illegally dumped on a pedestrian pathway in Kowloon since 27 February 2025 (see **fig. 51**). On the same day, 1823 replied by email that the case had been referred to HyD for follow-up. Our staff then asked whether the case would also be referred to EPD. In response, 1823 requested the complainant to provide further details related to the case, such as the source of the construction waste, the frequency of the illegal activity and any behavioural patterns. As our staff had not witnessed the construction waste being dumped, 1823 was informed that no such details could be provided, but a public housing estate nearby was suspected to be the source. On 7 March, 1823 confirmed that the case had been referred to EPD for follow-up. On 10 March, 1823 relayed a response from HyD that the construction waste had been cleared, accompanied by a photo taken on the morning of 8 March showing the location after clean-up (see **fig. 52**). On the same day, EPD emailed our staff acknowledging receipt of the complaint on 7 March. The Department stated that it would investigate as soon as possible and inform the complainant of the results.

Figure 51



Figure 52



5.17 On 27 March, EPD replied via email that upon receiving our complaint, its staff immediately inspected the location and the vicinity. Throughout March, EPD conducted blitz patrols and ambush operations at various times of day, including the afternoon and evening hours with more clearance and illegal disposal activities. Although construction waste was found at the reported location, no offenders were apprehended on the spot. During subsequent follow-up patrols, EPD staff found that the waste had been removed.

5.18 We consider EPD's handling of the case to be generally in line with the guidelines and procedures outlined in **paragraphs 3.13 to 3.15**, with no apparent impropriety. However, given the brief nature of illegal disposal activities, if enforcement officers cannot catch offenders in the act or obtain other evidence, it is typically difficult for EPD to prosecute those responsible.

SITE INSPECTION IN SHAM SHUI PO DISTRICT

5.19 On the evening of 9 April 2025 (Wednesday), our staff inspected several streets in Sham Shui Po District, including six locations designated by EPD as priority sites (as at March 2024). During the site inspection, we found considerable amount of

construction waste illegally dumped at four locations (see **figs. 53 to 56**). Three of these locations were either within or adjacent to the priority sites. On the following morning (10 April), our staff revisited the area and found that the waste at two of the locations had been cleared.

Figure 53



Figure 54



Figure 55



Figure 56



6

COMMENTS AND RECOMMENDATIONS

PREAMBLE

6.1 The illegal disposal of construction waste on the roadside has been a problem widely concerned by the public. In fact, EPD received numerous complaints every year. Such illegal activities not only cause inconvenience and safety hazards to the public and road users, but also affect environmental hygiene. In this connection, EPD has adopted multipronged measures against illegal disposal of construction waste. In February 2021, it also launched the “HoHoSkips” pilot scheme to provide the public and small-to-medium renovators with an effective way to collect construction waste.

6.2 In summary, we have the following observations and comments regarding EPD’s work.

(I) ENFORCEMENT AGAINST ILLEGAL DISPOSAL OF CONSTRUCTION WASTE

6.3 Over the years, EPD has spared no effort to adopt multipronged 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, 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 (see **fig. 5**). The number of illegal disposal cases confirmed by EPD fell by 38%, from 4,612 cases in 2022 to 2,841

cases in 2024 (see **fig. 4**). These figures reflect the substantive results of EPD's work, which are certainly commendable.

6.4 Although marked improvement has been achieved in recent years against illegal disposal of construction waste, and EPD generally arranges prompt investigation and clearance upon receiving complaints, we note that several District Councils continue to raise concerns about the problem in their districts from time to time (such as the Southern District, Kwai Tsing District and Kowloon City District); public complaints about illegal disposal of construction waste stand at over 1,000 cases annually (see **table 3**). 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 (see **fig. 4**). Moreover, during our site inspections and shadowing of EPD's operations, it was not uncommon to find construction waste dumped on streets (see **paras. 5.14 and 5.19**). 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

6.5 According to the data provided by EPD (see **table 5**), it annually instigated 65 to 129 prosecutions between 2019 and 2024, or an average of around 102 cases. In 2023, for example, EPD confirmed 4,153 illegal disposal cases of construction waste (see **fig. 4**) 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 hiking of fixed penalty from \$1,500 to \$6,000 in 2023 reflects the Administration's determination to crack down on related illegal activities. However, if EPD cannot improve its evidence-gathering effectiveness to instigate more prosecutions, the deterrent effect may not be substantially enhanced by the higher penalty. In fact, the quantity of illegally dumped construction waste cleared by the Government in 2024 increased rather than decreased in comparison with 2023 (see **para. 3.17**).

6.6 The Office understands that whether EPD proceeds with prosecution in illegal disposal cases depends on various factors, including the availability of evidence and legal advice. EPD has also explained that such illegal activities typically occur at surreptitious locations and during the small hours, with the dumping process being

extremely brief. As a result, successful enforcement and prosecution are not easy to achieve (see **para. 3.20**). To address this, EPD has in recent years stepped up patrols and installed surveillance camera systems at multiple locations where illegal disposal of construction waste is more frequent. Additionally, a drone fleet conducts aerial surveillance in hard-to-reach areas to facilitate tracing of offenders and enforcement planning (see **paras. 3.4 and 3.9**). 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.

6.7 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

6.8 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

6.9 According to existing requirements, any producer of construction waste should first apply to EPD for opening a billing account under the Construction Waste Disposal Charging Scheme before using government waste disposal facilities. Through this account, they can apply for valid chits and pay charges (see **para. 2.4**). As we understand, minor works contractors, renovation workers and members of the

public generally do not go to the trouble of opening the abovementioned accounts, arranging their own transport to deliver small quantities of construction waste to remote disposal facilities, or hiring demolition companies to handle the waste on their behalf. Therefore, the Office considers the “HoHoSkips” scheme helpful in addressing the needs of the public and renovators in managing construction waste generated from small-scale works, thereby reducing illegal dumping.

Insufficient Promotion of the Scheme

6.10 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 (see **paras. 4.11 and 4.12**), 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, 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.

Better Usage of Scheme Resources

6.11 As mentioned in **paragraph 4.17**, the recycler had capacity to arrange a maximum of 7,552 collections in 2023, but only 4,718 collections were made by year end, resulting in a service usage rate of 62.5%. In other words, 2,834 collections could still be provided by the recycler under existing resources, including manpower and collection fleet. However, 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 “service fully booked” (see **table 6**), i.e. bookings were cancelled due to insufficient capacity of the recycler to meet the demand at peak times (see **para. 4.23**). Yet, 40% of the overall service capacity was not used, 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.

6.12 The Office is pleased to note that following the launch of our investigation, EPD has improved the booking process by adding a new feature to the “HoHoSkips” mobile app. The enhancements include displaying the maximum number of bookings allowed per time slot, enabling users to view whether a time slot is fully booked, and showing other available slots for their consideration (see **para. 4.24**). As this new feature has been introduced for some time, the Office recommends that EPD review its effectiveness, such as any decrease in the number of bookings during peak times and any increase during off-peak times. EPD should also work with the recycler to explore feasible ways of shifting service demand from peak to off-peak times.

6.13 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 (a maximum of 7,603 collections could be provided in 2024, see **para. 4.18**). 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.

6.14 Despite the improvement, 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

6.15 To meet service demand, the recycler needs to make comprehensive route planning based on the collection times and locations specified in the bookings received. 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 two site inspections in October 2024 revealed that the entire procedures 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 (i.e. 1 hour and 15 minutes) 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 enhance the efficiency of resources deployment and 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.

6.16 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.

6.17 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 their views about “HoHoSkips” service as useful input for service improvement.

User Guidelines Missing Key Information

6.18 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. While users are required to sort construction waste into inert and non-inert materials according to its nature (see **fig. 16**), 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. During our site inspection on 7 October 2024 (see **para. 5.2**), the user was only informed on the spot that each bag of construction waste was overweight and should only be filled to half capacity.

6.19 To avoid recurrence of the above problem, 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 reduce booking cancellations, and to ensure correct and smooth use of the recycling service.

6.20 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 (see **para. 4.24**).

6.21 Furthermore, **table 6** shows that 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. As mentioned in **paragraphs 5.6 and 5.11**, 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 stipulated by the recycler is important information that should be included in the user guidelines for users to make informed decisions before booking. This will not only help reduce hasty bookings and subsequent cancellations, but will also save the recycler’s resources and time for processing cancellations, achieving two objectives with one move.

(III) “SMART HOHOSKIPS” SELF-SERVICE RECYCLING SCHEME

6.22 There are views among the minor works trade that the construction waste collection service under the “HoHoSkips” scheme is not user-friendly, citing such grounds as its fixed collection points being too far from construction sites, limited options of collection points, and collection service not being able to arrange within short time frame. In fact, alongside the map of fixed collection points, the “HoHoSkips” mobile app also has a map of custom collection points, giving users more options. The Office recommends that EPD enhance the relevant app pages to make the map of custom collection points more prominent. Furthermore, the Office understands that due to resource constraints and the limited road space in Hong Kong, the “HoHoSkips” scheme is indeed unable to fully accommodate all requested collection times and locations. To facilitate the use of recycling service by members of the public and the minor works trade without the need to make booking, 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 in **table 7** 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.

Review and Expansion of the Service

6.23 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, such as Sham Shui Po and Yau Tsim Mong (see **para. 3.17**). 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.

6.24 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

6.25 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 (see **paras. 5.9 and 5.10**). 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.

6.26 During our direct investigation operation, we kept track of the updates and notices of service changes issued on the “HoHoSkips” website and mobile app. We noted that both the website and mobile app rarely issued any updates or notices. As at May 2025, the latest notice was issued on the website and mobile app on 28 August and 9 September 2024 respectively. The notices announced the update of the “HoHoSkips” mobile app, and the formal launch of the “Smart HoHoSkips” self-service recycling scheme. However, neither the website’s “What’s New” session nor the mobile app mentioned the service suspension of the smart skips on Lai Po Road due to maintenance between 20 January and 10 February 2025 (see the note to **table 7**). 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. It also prevents users from only finding that the smart skips are out of service upon arriving at the facilities, resulting in a waste of time. We recommend that EPD remind and supervise the recycler to improve in this regard.

6.27 Separately, between November 2024 and May 2025, 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” (see **fig. 15**). Although such information is available on the website, it is still inconvenient for mobile app users. EPD should rectify this issue.

RECOMMENDATIONS

6.28 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 (see **para. 6.6**);
- (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 (see **para. 6.7**);

- (3) continue to strengthen publicity and education through various channels, raising awareness of environmental protection and compliance among the public and particularly the trade (see **para. 6.8**);
- (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 (see **para. 6.10**);
- (5) review the effectiveness of the new feature of the “HoHoSkips” mobile app (see **para. 6.12**);
- (6) work with the recycler to explore feasible ways of shifting service demand from peak to off-peak times (see **para. 6.12**);
- (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 (see **para. 6.14**);
- (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 (see **para. 6.15**);
- (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 (see **para. 6.16**);

- (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 (see **para. 6.17**);
- (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 (see **paras. 6.19 and 6.21**);
- (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 (see **para. 6.23**);
- (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 (see **para. 6.24**);
- (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 (see **paras. 6.25 and 6.27**); 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 (see **para. 6.26**).

ACKNOWLEDGEMENTS

6.29 The Ombudsman thanks EPD for its full cooperation in the course of this investigation, and members of the public with a concern about this topic for submitting their valuable opinions.

Office of The Ombudsman
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