

**LETTERHEAD OF ASSOCIATION OF BETTER BUSINESS & TOURISM
SERVICES**

立法會 CB(2)1675/00-01(01)號文件
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By Post & Fax: 2509 0775

Mrs Constance Li
Clerk to the Bills Committee on
Public Health and Municipal Services (Amendment) Bill 2001
3/F Citibank Tower, 3 Garden Road
Central
Hong Kong

Dear Mrs Li,

**Written submission on the
Public Health and Municipal Services (Amendment) Bill 2001**

Thank you for your letter inviting the Association of Better Business and Tourism Services (BBTS) to provide written submission on the Public Health and Municipal Services (Amendment) Bill 2001. On behalf of the BBTS, we strongly agree to the proposal that the Director of Food and Environmental Hygiene be empowered to close unlicensed and unhygienic food establishments without the need to apply for a court order.

As all of our members are licensed food establishments, the existence of unlicensed food establishment is unfair to the licensed operators and posts an adverse impact on the overall image of Hong Kong catering industry.

We strongly support the proposal of providing a simpler and faster closure procedures to tackle the problem of unlicensed or unhygienic food premises. However, we are of the view that the time required for issuing a closure order should be further shortened beyond the suggested one and a half month period. A closure order should be issued and enforced immediately once any unlicensed or unhygienic food premises is discovered. In addition, we believe that stringent measures such as minimum penalty should be executed in order to deter the existence of unlicensed or unhygienic food operations.

Furthermore, BBTS fully supports the proposal to tighten the control on unhygienic food establishments, and trust that it can raise the overall hygienic standard of the catering industry and beneficial to the entire community. Nevertheless, we are of the view that sets of comprehensive investigation guidelines should be developed for officers concerned to effect a Closure Order in situation of unlicensed and unhygienic food establishments.

Thank you for your kind attention.

Yours sincerely

Frank Lee
Chairman