

香港衛生督察會  
**HONG KONG PUBLIC HEALTH INSPECTORS' ASSOCIATION**  
(Member of the International Federation of Environmental Health)

**Provision of Municipal Services (Reorganization) Bill**  
**proposal from the**  
**HK Public Health Inspectors' Association**

**Summary of contents**

In order to avoid the SAR being manifestly seen to adjust its environment and health to a lower level than most countries by surrendering the long-used term “Environmental Health” for the lesser “Environmental Hygiene”; also to organise a more representative and realistic Advisory Council for Food and Environmental Health, this Association proposes two amendments as follows:

- (1) the new dedicated department when formed be named: **“Food and Environmental Health Department”** and with the incidental references accordingly named as **“environmental health”**;
- (2) in the new Advisory Council for Food and Environmental Health when formed, at least one seat be reserved for the environmental health profession.

Note

- Substantiating facts may be found in the attached letter ;
- The proposal in (1) does not affect: (a) the Chinese versions as both “health” and “hygiene” may be known as 『衛生』  
(b) the initials on the name of the new Department, i.e. “F.&E.H.D.”

提供市政服務（重組）條例草案  
香港衛生督察會的提議

**內文撮要**

為避免香港特別行政區將英文名字由原用的“Environmental Health”降為“Environmental Hygiene”因而在國際間顯得香港在環境衛生水平上不如大部份國家；以及能成立一個更具代表性和更實際的「食物及環境衛生諮詢委員會」，本會建議以下兩項修訂：

- (1) 因改組而成立的專責新部門應以“Food and Environmental Health Department”為英文稱號並採用“Environmental Health”為日後相關名稱的英文用字；
- (2) 在新的「食物及環境衛生諮詢委員會」成立時，應最少預留一席位給環境衛生行業。

註

- 詳細內容及論據請參閱附上之信件；
- 第(1)項提議對以下兩點並無影響： (甲) 中文版本。因在中文來說“health”和“hygiene”都可譯為『衛生』；  
(乙) 新部門名稱。因兩者的英文簡寫都是“F.&E.H.D.”。

香港衛生督察會的信頭

**Letterhead of HONG KONG PUBLIC HEALTH INSPECTORS' ASSOCIATION**

(Member of the International Federation of Environmental Health)

c/o Yau Tsim District Office(EH)  
Urban Services Department  
Kwun Chung UC complex  
17 Bowring Street,  
Yau Ma Tei  
Kowloon

16<sup>th</sup> October 1999

Clerk to Bills Committee  
on Provision of Municipal Services (Reorganization) Bill,  
Legislative Council Secretariat  
8, Jackson Road,  
Central,  
Hong Kong.

Dear Sir,

**Legislative Council**  
**Hong Kong Special Administrative Region**  
**Provision of Municipal Services**  
**(Reorganization) Bill**  
**Invitation of submissions**

Many thanks to the captioned invitation which we recently read with earnestness in the papers.

The reorganization is a major exercise to which members of the health inspectorate officers' (**HIO**) profession are directly relevant. And the Hong Kong Public Health Inspectors' Association (**HKPHIA**, or the Association) established in 1949 is the only staff association representing all levels of HIOs in the SAR. Albeit registered under the Trade Unions Ordinance, the HKPHIA cares for all aspects of the HIOs' profession, including professionalism. Due to such commitments, the Association has since 1994 been exceptionally admitted into the International Federation of Environmental Health (**IFEH**) as a **full** member (up-dated membership list at Appendix I)

Regarding this municipal services reorganization, the Association had forwarded two submissions in June 1998 and March 1999 (Appendix II & III. These two rather 'bulky' submissions could be reached at "<http://hkphia.mail.org.hk>"). The first before and the second after the consultants' Report (the **Report** - copies of which are available in the Legislative Council Secretariat, I trust). We had expressed in earnest quite some views on operations, deployment and efficiency but there were also recommendations made in the nature of principle.

The most important view has been in the nomenclature on our scope of duties, i.e. "environmental health" against "environmental hygiene" as proposed by the consultant. Reasons in brief are :

### **A. Background:**

**Environmental Health** (mainly enforcement) is internationally, a fast developing subject which has become a separate discipline to function alongside the traditional Public Health (mainly clinical healthcare and disease prevention/treatment). Health Inspectors (**HI**s) in most developed countries have accordingly been re-titled as Environmental Health Officers (**EHO**s). Others continue to operate with the traditional title / department of Public **Health**.

**Environmental Hygiene** is just one part among the various duties of Env. Health. e.g. In USD/RSD, Env. Hygiene is only one among several sections viz. Hawker Control; Market Management; Public Cleansing; Pest Control; Licensing; Prosecution; Food Surveillance; Meat Inspection; Cemeteries and Crematoria; Land Transport...  
(pg. 5-8 & app. II of PHIA 3/99 submission, Also Pg 7-10 of PHIA 6/98 submission)

### **B. Local situation**

#### **(i) Our Workstream:**

is known : in USD as **Environmental Health Branch**  
in RSD as **Environmental Health Division**

#### **(ii) Our Job Ranks**

has always been : **Health Inspector - Senior Health Inspector - Chief Health Inspector - Superintendent & Senior Superintendent of Environmental Health**

#### **(iii) Our Post Title**

the most illustrative District Environmental **Health** Superintendent  
one is :

(changed from the former District **Hygiene** Superintendent because "Hygiene" failed to reflect his scope of duties)

### **C. Mainland Situation:**

Throughout it's "health" and not "hygiene" e.g.

**Public Health Bureau** - responsible for food safety, restaurant control etc.

**Environmental Health Bureau** - responsible for public cleansing operations etc.

(Information acquired from the Association's visits to counterparts in Beijing, Shanghai, Nanjing, Suzhou, Wuxi & Shenzhen. Also a reciprocal visit was returned to the PHIA by Prof. Xuequi Kan- Director General of Health Inspection & Supervision of the Ministry of Health.)

## **D. Overseas Situation**

It's "**health**" throughout. And in most developed countries where the environment and health are best guarded, ad hoc government departments of environmental **health** have already been formed with their public health inspectors retitled as environmental health officers to denote their changing role. Whereas the traditional medically-oriented public health departments continue their important healthcare function of disease prevention/treatment. These two, alongside the environment protection agency, operate side by side and complement each other amicably. Due to clear delineation of duties, **no confusion** had occurred.

Note:

- (1) In April 99 the IFEH, for the first time ever, came to HK to hold a Council Meeting. Having enquired and astonished about the retrograding 'env. hygiene' recommendation, the IFEH President squeezed some time to provide input from an international angle against that. (Appendix IV)
- (2) Also, the Singapore Association wrote a letter to clarify their nomenclature as env. **health** and **not** env. **hygiene** as claimed in the consultant's report. (Appendix V)
- (3) Recently the Swedish UMEA University requested the PHIA to arrange a 5-week training for 1 of the their final year students to "*study how the Department of environmental health works in Hong Kong*" in February / March 2000 (Appendix VI).

Though a pleasant surprise : e.g.,

- (a) the first time ever, and from a university to look for **training** from H.K.;
- (b) it has always been Singapore that other countries sought training from;
- (c) once started, this may not be the last time;
- (d) we never solicited or even heard about the idea before. Verification is welcome.

Nevertheless, we cannot oblige because env. health has been recommended for elimination with the millennium. And nobody, let alone a Swedish university would seek overseas training in "hygiene". And I cannot accept by pretending we still have env. health. That would be immoral and consequential venture! A dilemma because I am reluctant to just thank them and decline! Besides, there need be embarrassing explaining on the reason of rejection to do.

- (4) If such **auto-demotion** from env. health to env. hygiene were to materialize through the naming of the new dedicated Government Organization as the "Food and Environmental **Hygiene** Department", the Special Administration Region will immediately be **dwarfed** and for no reason in the international forum. Furthermore, it will appear like a **cynical** response to the SAR's "*emphasis on the environment*" as declared by the Chief Executive in his recent policy address! Compared to that, the Association's future **embarrassing** position (when HK no longer has env. health) in the International Federation of Environmental Health would, but be of lesser impact.

That there could be such **retrograding** and **self-dwarfing** recommendation for the 21<sup>st</sup> century is beyond our limited political wisdom. Likewise we were astonished by the consultant's consultation list viz.:

- (i) 4 groups out of the total 5 were medical;
- (ii) 14 individuals out of the total 18 were medical.

These were indeed all public health experts rather than environmental health practitioners. And having consulted a **UK** Regional Director of Public Health, the **all UK's** Chartered Institute of Environmental Health was not! (Para.1.04 & App.I of the Report) (Pg. 4-5 & App. I of PHIA 3/99 submission) Also the HK Public Health Inspectors' Association's application for interview was declined, however our fellow union leaders from the culture stream were interviewed.

Also, for the Advisory Council for Food and Environmental Hygiene, the consultant has proposed 19 seats comprising a variety of representatives. Curiously not a single seat was for the practicing Environmental health profession, a **relevant** group while the rest like 'Public Health Professionals', "Community Medicine Academics" (these 2 are not duplicating?) and the 'Food Trade representatives' were each offered 3 seats! (Para.8.03-8.04 of the Report) (Pg. 13 & App. I of PHIA 3/99 submission)

Clearly fairness and realism of such composition are questionable.

It is therefore our sincere, earnest and equitable appeal, that the Legislative Council approves that:

- (1) the new dedicated department when formed be named: **"Food and Environmental Health Department"** and with the incidental references accordingly named as **"environmental health"**.
- (2) in the new Advisory Council for Food and Environmental Health when formed, **at least one seat** be reserved for the environmental health profession.

Yours faithfully,

---

(Peter Y.C. KU)  
Chairman

c.c. Hon. Michael HO  
Chairman,  
Health Services Panel,  
Legislative Council

Head,  
Task Force on Reorganization  
of Municipal Services

DUS

**THE INTERNATIONAL FEDERATION OF  
ENVIRONMENTAL HEALTH**

**List of Members and Associate Members (September 1999)**

**MEMBERS**

Austria - Association of Food Inspectors;  
Australian Institute of Environmental Health;  
Botswana Environmental Health Officers Association;  
Canadian Institute of Public Health Inspectors;  
Cyprus Association of Public Health Inspectors;  
Denmark - [MFK] Foreningen Af Miljomedarbejdede Kommunwene;  
England Wales and Northern Ireland - Chartered Institute of Environmental Health;  
Finnish Communal Association of Environmental Health and Protection;  
France - Association Nationale des Ingenieurs du Genie Sanitaire;  
Germany - Federal Association of Food Control Inspectors;  
Greece - Association of Public Health Inspectors;  
Hong Kong Public Health Inspectors' Association;  
Ireland - Environmental Health Officers Association;  
Indonesia - Association on Environmental Health;  
Kenya - Association of Public Health Officers;  
Latvian Association of Preventive Medicine Functioners;  
Malawi Environmental Health Officers Association;  
Malaysian Association of Environmental Health;  
Mauritius Health Inspectors Cadre;  
New Zealand Institute of Environmental Health;  
Norway - Forum for Miljo og Helse;  
Singapore Society of Environmental Health Officers;  
Scotland - Royal Environmental Health Institute of Scotland;  
South African Institute of Environmental Health;  
Swedean Environmental Health Officers Association;  
Tanzania Association of Health Inspectors;  
United States of America - National Environmental Health Association;  
Zimbabwe Association of Environmental Health Practitioners;

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## **ASSOCIATE MEMBERS**

Arizona Environmental Health Association;  
California Environmental Health Association;  
EHOverseas [UK];  
Gibraltar Association of Environmental Health Officers;  
Minnesota Environmental Health Association;  
Peruvian Association of Sanitary and Environmental Engineers;  
The Tidy Britian Group UK  
USA - Underwriters Laboratories Inc.

## **ACADEMIC ASSOCIATE MEMBERS**

### Australia

Curtin University of Technology, Western Australia;  
Flinders University, South Australia;  
Griffith University, Queensland;  
Queensland University, Queensland;

### Canada

British Columbia Institute of Technology, B.C.;  
Ryerson Polytechnical University, Ontario;

### England

King's College, University of London;  
Leeds Metropolitan University, Leeds;  
Manchester Metropolitan University, Manchester;  
Norwich City College of Higher and Further Education, Norwich;  
Salford University, Salford;

Hong Kong - Hong Kong Technical College;

Ireland - Dublin Institute of Technology, Dublin;

Northern Ireland - University of Ulster;

## Scotland

Edinburgh University, Edinburgh;  
Scottish Centre for Infection and Environmental Health, Glasgow;  
Stevenson College, Edinburgh;  
University of Strathclyde, Glasgow;  
West Lothian College, West Lothian

Singapore - Ngee An Polytechnic;

## South Africa

Cape Technikon;  
M.L. Sultan Technikon, Durban;  
Technikon Natal, Durban;  
Technikon North Gauteng, Pretoria North;  
Peninsula Technikon;  
Technikon Pretoria;  
Vaal Triangle Technikon;

Sweden - Umea University, Umea;

## USA

Loma Linda University, California;  
Russia / America Environmental Centre Philadelphia;

Wales - University of Wales, Llandaff, UK



HONG KONG PUBLIC HEALTH INSPECTORS' ASSOCIATION

香港衛生督察會

Comments

on the

**Review of**

**DISTRICT ORGANISATIONS**

**CONSULTATION DOCUMENT**

(JUNE 1998)

The Secretary  
Constitutional Affairs Bureau,  
3/F., Main Wing,  
Central Government Offices,  
Lower Albert Road,  
Hong Kong.

July 31, 1998

Dear Sir,

**Review of District Organisations**

Over this very important subject which affects all health inspectorate officers (HIOs), extensive discussions have taken place among grade members at various levels. Considerations have included areas that are relevant and the majority findings are listed below:

**A. Diversity of current health administration**

Hitherto these very important duties have been undesirably splintered into:

(1). UC/USD

RC/RSD



General environmental health (including health education and pest control) + control of food & other premises that require council licence.

(2). Department of Health (DH) - Food Surveillance (FS), Health Education (HE), Pest Control Advisory Unit (PCAU)

(3). Agriculture & Fisheries Department (AFD) - Live animals and poultry control.

This administration is grossly over-diversified and the following points are noteworthy:

**(a). The phenomenal situations of:**

- (i). RC & UC setting different standards on similar situations is already well- known:  
e.g. the “sushi, sashimi and oysters.....” differing legislations;
- (ii). RC & UC setting different inspection frequencies to licensed premises (LPs).

	Category A  LPs	Category B  LPs	Category C  LPs
RC	Once in 8 weeks	Once in 3 weeks	Once a week
UC	Once in 8 weeks	Once in 4 weeks	Once in 2 weeks

- (iii). RC & UC setting different prosecution frequencies to unlicensed premises:

	Not under application for licence	Under application for licence
RC	weekly	monthly
UC	monthly	bi-monthly

(iv). RC & UC are authorized to make by-laws for frozen confections and milk; while Director of Health (DH) is authorized to make regulations for artificial sweeteners and dried milk.

(v). RC in its Food Business By-law, makes it an offence for a licensee to cause/permit without approval **deviation** etc. to his premises. UC however, makes it an offence only when a **material deviation** is caused without approval. The term material had created the substantial effect that while a licensee doing something in the NT breaks the law, he would be perfectly innocent if he repeats his act in the urban area. This was a sorry and ridiculous situation in principle as well as in practice as there are so many chain-food businesses operating in both UC and RC areas. Many USD prosecutions fell apart, failing evidentially to meet the ‘material’ requirement. This Association had on more occasions than one pointed out to USD for rectification but to no avail.

(vi). Pest Control Advisory Unit (PCAU) exists in DH which Pest Control (PC) operations are carried out in USD & RSD;

(vii). Health education, albeit an important mission is however carried out separately by DH, UC/USD and RC/RSD.

**(b). Policing of food establishments:**

This is conducted by HIs in USD/RSD through visual inspections on the general hygiene and environmental conditions of the premises. However, to ensure safe food production, these visual inspections need be matched by adequate food samplings for bacterial examinations and chemical analyses. The samplings which are duties of HIs in DH need be increased in frequency to achieve the matching effect. The current inadequate situation could be due to varying resources/priorities in the related departments viz DH and Government Laboratory;

**B. (Municipal) Council Culture**

**(1). (Political) Party Politics**

This has taken dominance and Party Line has perceptibly often phased out individual views formed from councillor's own wisdom or conscience. Such situation could serve the interests of the parties but whether the interests of the public were served is uncertain. From time to time, those decisions reached albeit capable of appeasing their potential voters did not always sound sensible.

One example may be seen from the recent 30% reduction in the licence fees.

Perceptibly the results were:

- (a). favour with voters (certain portion) won;
- (b). big drain on the already difficult financial position;
- (c). the financial alleviation on the licensees was minimal. What they do need are more customers who could really make a difference. Such apparent political decision which was reached against USD objection impresses many tax payers as a regrettable one.

Another example could be found over some councillors' insistence in the design of a Refuse Collection Point (RCP) in Western District on HK Island. Despite repeated advice from USD officers including an on-site visit demonstrating Department's correct recommendation, councillors' persisted decision was nonetheless maintained costing an extra substantial amount of public money. A series of affairs is at appendix.

## **(2). Certain arbitrary decision**

The Central Library Design was a regrettable and striking incident, even though one may look at the council from different angles, e.g. the manner the issue was manipulated; the apparently overbearing attitude at the DUS (who was not ill- intended) or her tabled design (which did not appear ill-conceived) compared to the finally adopted design.

### C. Some bizarre view

A councillor had written several months ago to a newspaper expressing dissatisfaction with the amount of refuse claimed found in Victoria Park in the early mornings. To this, she queried that despite the number of health inspectors employed, they were not sent to book the litterers. This is some bizarre view no matter one looks at the HIs regarding their : professional qualifications; level as Officers cadre; salary scale; relatively small numbers etc. Supervisory staff, viz foremen etc have, for practical and cost-effective reasons been appropriately deployed for such duties since the 70s to match the keep Hong Kong Clean Campaign. Catching litter- offenders means more than spending time at scene. Much more time has to be prepared to attend court as witness whenever the offender pleas not guilty. In such situation the HIs have to be taken away from their more important food-related duties that really demand their attendance.

Above cited are some off-hand examples. Many staff no doubt have more similar 'experience'. On these backgrounds and other examples regarding councillors and the council, views reflected by PHIA members have been in line with the government's thinking, i.e. Environmental Health (EH) should be detached from the municipal councils; that the fragmented duties on food hygiene and other aspects of EH be re-integrated to form a **unitary** and **independent** department that can operate professionally under the central government monitored by an appropriate policy branch (we have been without one long enough, the previous Municipal Services Branch had to be disbanded due to the councils.)

Along this broad principle we nevertheless find it necessary to attach alerts as following:

1. Environmental health totally differs from other disciplines including health care.

**In nature - Health care** is largely **clinical care** and **Environmental health** is basically achieved through **law enforcement operations**, e.g.

- a). **Unlicensed premises** are subject to prosecution on sight; worse ones are subject to summary arrest and physical closure. Police back-up is often required.
- b). **Licensed premises** are policed regularly. Breaches often lead to prosecution/suspension/cancellation of licence.
- c). **Hawker control** (highly organised, mobile, speedy & semi- disciplinary function)

*Unlicensed hawkers* are arrested on sight with paraphernalia forfeited mandatorily. Police assistance is often needed.

*Licensed hawkers* are monitored regularly. Breaches lead to prosecutions, suspension or cancellation of licence.

- d). **Market management**

Markets are monitored daily. Breaches would lead to warnings, prosecutions, suspension and cancellation of lease. Articles may be seized and forfeited.

- e). **Public cleansing**

*Solid waste collection and disposal*

A 364-days-a-year, complicated and highly organized function for



which dedicated study courses lead to a specialised diploma. In daily operation the cutting away and removal of articles chained in public places are enforced.

***Anti-litter Operation***

Offenders are prosecuted on sight. At times, special overnight operations are mounted to catch late night fly-tipping of bags or even lorry-loads of refuse. Police back-up is at times needed.

f). **Pest control**

Prosecutions are often instituted against mosquito breeding especially in building sites on top of direct elimination actions.

g). **Nuisances**

Statutory notices are served to the responsible party on nuisance being ascertained. Non-compliance to such notice invariably results in prosecution.

From the very beginning, sanitary inspectors worked directly under the Medical Officer (MO) as the service then was mainly infections disease control and sanitation. This hierarchy, over the years had proved to be inefficient, problematic and produced unpleasant working relationship. The reasons were mainly due to different professional backgrounds and the basically different functions between the MOs and the HIOs. Hence, the MOs who did not carry out the outdoor enforcement functions of the HIOs could not adequately understand the matters, the difficulties or problems to be able to manage. Hence, over 2 decades ago, USD senior directorate finally removed the MOs from administration to be placed in an advisory capacity. Later on

even the last remaining MO: the Assistant Director (Hygiene) was reverted back to the then Medical & Health Department. Since the separation, things worked out satisfactorily as the 2 different professions were allowed to go about their own business without clash. We co-operated well with their advisory role and their views were always sought especially in mass/important food poisoning outbreaks or infectious disease control.

This state of affairs has been further consolidated as the last decade witnessed Environmental Health (EH) developed and matured more. The discipline has recently grown into such horizons globally that one sometimes wonders if between the 2 professions EH has taken the limelight? For this profession, most developed countries have abandoned the traditional job title of **“Public Health Inspector” (PHI)** and adopted the realistic one of **“Environmental Health Officer” (EHO)**. Such change, undertaken by national governments one after the other, is surely one of significance rather than whim. Some of these as I found through the **International Federation of Environmental Health (IFEH)**, into which HKPHIA has been admitted as a full member) are:

**United Kingdom, Ireland, Scotland, United States of America** (except California, when they are all titled as Environmental Health Specialist),  
**Australia, New Zealand; Singapore, Malaysia, Indonesia, Sweden; South Africa, etc.**

Moreover in most developed countries, since some 2 decades ago, the MOs began to function as advisers instead of as administrators as far as Environmental Health is concerned. Unfortunately EH services in Hong Kong had hitherto been much less regarded than they deserve. The reasons are quite obvious, their very

‘unattractive’ nature viz managing kitchens, toilets, refuse, sewers, slaughterhouses, meat shops, markets, hawkers..... compared gloomily to other in-house functions like the prestigious City/Town Hall; high-brow libraries & museums; pleasing bathing beaches; convenient in-door-games-halls, pretty flowering gardens & green parks, aviaries, etc. How can people be blamed for ‘slighting’ the ‘obnoxious’ EH functions that have nothing in common with these other glamorous provisions? We had to live with anonymity which was paradoxically gained by our successful outbreak-prevention efforts over the past decades. And when finally outbreaks did happen since last year they were due largely to mishap rather than staff (except Avian Flu, the others which were mostly imported like E.Coli O157-H7; Listeria monocytogenes and Cholera had long been occurring in other countries including USA and Japan who simply dealt with them without panic).

To tackle these outbreaks HIOs have quietly responded to calls for mobilisation on a number of extra occasions including Sundays, Saturdays, early mornings and late evenings. (Incidentally, they are not unused to this, as for the past couple of years their weekdays’ work lasted till around 7pm on the average). It is really unfortunate that EH work had to become better recognised through crises.

In any case the new EH department when formed would be large enough with its over seventeen thousand staff who perform inter-related functions in the EH discipline. Together they may then deliver EH service in a **holistic** manner as is the world trend and which is also declared in a policy statement of the **International Federation of Environmental Health**. *(Thus, the Federation believes that successful environmental control in the future depends on the adoption of an holistic approach to the subject, and recommends that all member organisations and associated bodies promote in*

*whatever way possible to all interested organisations (including governments) at the local, national, and international level, the adoption outlined in this Declaration.)*

The new EH department should not suffer any reduction of staff even though some superficially similar posts existed in the 3 former departments including in the headquarters. The reasons are obvious - apart from the enlarged areas of service to be provided, the expectation of service from the new streamlined department would also be substantially higher. Therefore, to deliver better service with the same number of staff is already itself an adventure.

Therefore, to sum up, **EH should be detached from the municipal councils and form an independent, unitary department of its own to effectively carry out all EH duties (currently discharged through USD, RSD & DH). This will enable the director to be emancipated from entanglements and daily affairs from totally different disciplines (e.g. a Central Library design, library opening hours, HK Stadium incidents, etc. from Culture, Recreation & Amenities) and to concentrate to administer the vital service of EH, as practised in most other countries. The department should be headed by Administrative Officer (AO) instead of by Medical or other Professional and under the central Government.** This is also the resolution reached in a dedicated Extraordinary General Meeting convened to discuss the issue.

Incidentally we noted that one main lunge at such logical concept is the alleged “*resultant loss of supervision*” With respects this is an appeasing but in reality a specious view. Even a newcomer would find Hong Kong so transparent that it’s hardly believable for any government department with or without an overseeing council, to operate in any way they like and free from public supervision. Examples

are so numerous that it's inconceivable that anyone could be indoctrinated by that lunge e.g. ".....Police being accused of drowning protestors' voices with music; Observatory being blamed for the 'inconsiderate' timing of imposing/lifting the typhoon/storm signals; Department of Health being criticised for their dispensary and other service; Agriculture & Fisheries Department was criticised for their 'inefficient' poultry-slaughter actions; the Airport Authority..... etc." Above quoted off-hand are all vivid examples of effective public supervision as there is no UC or RC to govern these departments. We therefore find that lunge a totally unconvincing one. What will happen clearly, is that the new EH department with its **public** services will function under scrutiny by the general public whom we service directly, alongside supervision and control by the Executive and Legislative Councils.

We do not know if anyone has to hold on to the view that a government department must go wrong unless being directly supervised by politicians. If so then they should campaign for setting up dozens of UCs/RCs to govern the dozens of government departments, one over one, e.g. a Police council, a Fire council..... so as to salvage these essential services.

Above are the views, this Association, having considered several aspects including time-limit and courtesy, finds appropriate to present for consideration. It does not bind individual members from expressing directly their own experience or sentiments.

Yours faithfully,

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(Peter Y. C. KU)

Chairman

**Sai See Street Temporary Off-Street Refuse Collection Point(RCP)**

**Western District, USD**

1. Due to the Belcher's Bay Reclamation works, the major on-street RCP at the Sands Street had to be closed in Summer of 1994.
  
2. DLO gave Formal Temporary Land Allocation to USD in mid-1994 for the erection of an off-street Temporary RCP at the North-Western portion inside the site of a just-vacated vegetable wholesale market.
  
3. This new off-street site was handed over to USD on 18.11.1994. On request, ASD in mid-1995 estimated that the cost to construct a temporary RCP equipped with the usual basic facilities, including concrete-paved floor, proper drainage, water supply, electricity, fire-fighting equipment and metal sheet walls with openings near the roof and ground surface for natural ventilation, would be **\$696,400**. But, before formalities for final decision including local consultation etc could be completed, UC has made a new policy in early 1996 to require all RCPs be of **enclosed type** to prevent the spillage of nuisance affecting nearby residents. In such case, the usual basic design for even a temporary RCP had to be scrapped and since the whole RCP would be enclosed, artificial ventilation system became necessary, and substantial walls were required to uphold the ventilating system. The construction cost for such renewed RCP was estimated to be around **\$13.28 million**.  
Despite repeated lobbying

## Appendix

including an on-site visit demonstrating that for this particular case there would be no nuisance problem with our original basic design as the nearest residential premises were over a hundred meters away, the Councillors nonetheless persisted with the enclosed type, which was a principle that must be maintained.

4. Facing such difficult position, USD suggested and ASD worked out two options for economical consideration in late 1997:

- (a) to build an enclosed-type RCP with two-storey building, which would cost about \$13.28 million; or
- (b) to build a simpler designed RCP with a single-storey building equipped with basic essential facilities, which would cost **\$6.32 million.**

As the site may be required for Comprehensive Development Area project in early 2002, and the life span of this temporary RCP would be less than 3 years, the Council finally accepted option (b) as recommended by USD.

5. In fact, the design in option (b) was not too different from the earlier proposal in mid-1995 regarding the nuisance aspect, but the cost has increased **from \$696,400 in 1995 to \$6.32 million in 1998.**

**Letterhead of THE INTERNATIONAL FEDERATION OF  
ENVIRONMENTAL HEALTH**

Mr Peter Ku  
Chairman  
Hong Kong Public Health Inspectors Association  
Flat C, 5<sup>th</sup> Floor, MARPLE Court  
41, Broadcast Drive, Kowloon, Hong Kong

Dear Peter

1999-04-22

It's now already two weeks since the Federation's Council held its meeting in Hong Kong and so many nice memories linger in my mind. Since then I've attended two more meetings in Geneva and in Rome respectively.

Having just returned home yesterday, one of the first things I hurry to do is to write this thank-you letter for all your efforts and preparations which accounted for our successful Hong Kong meeting.

Apart from the hotel accommodation and the well-equipped conference room were the very impressive technical visit that enabled Environmental Health Officers/Professionals from 9 different countries to meet and see our Hong Kong colleagues at work. Impressive was also the world famous vibrant city-life of Hong Kong, the beautiful and well managed Ocean Park and last but not least was the excellent food representing many different parts of China. Hong Kong was a truly fantastic experience.

I want to express our deep felt thanks to both you yourself and to your executive committee for your very good work and hospitable reception. I do this on behalf of all the delegates from Australia, Denmark, Germany, Ireland, New Zealand, Singapore, South Africa, Sweden and United Kingdom who attended the meeting and also on behalf of all our other colleagues and Federation members who did not have the possibility to take part in this meeting. We look forward to another round of meeting in Hong Kong sometime in the future.

Now regarding our discussion on Environmental Health / Hygiene.

It seems to me very unfortunate if not to say unwise to revert to the term Hygiene which does not reflect the full range of duties of an Health Inspector or an Environmental Health Officer/professional as he/she is commonly called today. In my own country Sweden the profession is even called Environment and Health Protection Professional in direct translation.



The world has been fast changing and today the emphasis is on the environment and the environmental impact on human health and with it are the communities' additional demands for a healthy and safe environment.

Hence our training has been shifting to incorporate more and more environmental health aspects and an increasing number of countries require a degree in Environmental Health as a basic qualification for the profession.

This trend started in the 1970-ies and as the system became adopted by more countries the profession also has developed according to evolving needs into a more broad-spectrumed discipline different from the former Public Health which involved disease-prevention and in some countries even clinical health-care.

Environmental Health has thus incorporated Public Health issues. It's very surprising to learn that in an advanced city like Hong Kong there are suggestions to stifle this development and turn back, in time of the new millennium, to such a narrow concept as Hygiene suggests.

I'd like to quote a World Health Organisation definition of Environmental Health which surely shows the wide scope of the present and future of our profession:

“ Environmental Health comprises those aspects of human health, including quality of life, that are determined by chemical, physical, biological, social and psychosocial factors in the environment. It also refers to the theory and practice of assessing, correcting and preventing those factors in the environment that can potentially affect adversely the health of present and future generations.”

I certainly wish you all success in your further discussions about the future of environmental health in Hong Kong and feel secure that your professional skills will make it self-evident that the future development must be towards environmental health. Do not hesitate to contact myself or Michael Halls, the Hon Secretary of the International Federation of Environmental Health, if there is anything more we can do to clarify the present environmental health professional situation.

Finally once more many thanks for an excellent meeting in very interesting surroundings!

Very sincerely

Kia Regner  
President

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**Letterhead of SOCIETY OF ENVIRONMENTAL HEALTH**

15 Apr 99

Mr Peter Y C Ku  
President  
Hong Kong PHIs' Association  
Flat C, 5<sup>th</sup> Fl., Marple Court  
41 Broadcast Drive  
Kowloon, Hong Kong

Dear Peter

Thank you for your warm hospitality accorded to us during the IFEH council meeting from 8 to 10 Apr 99. The meeting was a good forum for us to exchange ideas and share experience in the field of environmental health.

With regard to your enquiry on the set-up in Singapore, we use the term environmental health or environmental public health instead of environmental hygiene. We have a broad range of public health programmes which include food safety, food hygiene, street cleansing, vector control and epidemiology. We also attend to public health nuisance and oversee refuse removal which is now privatised.

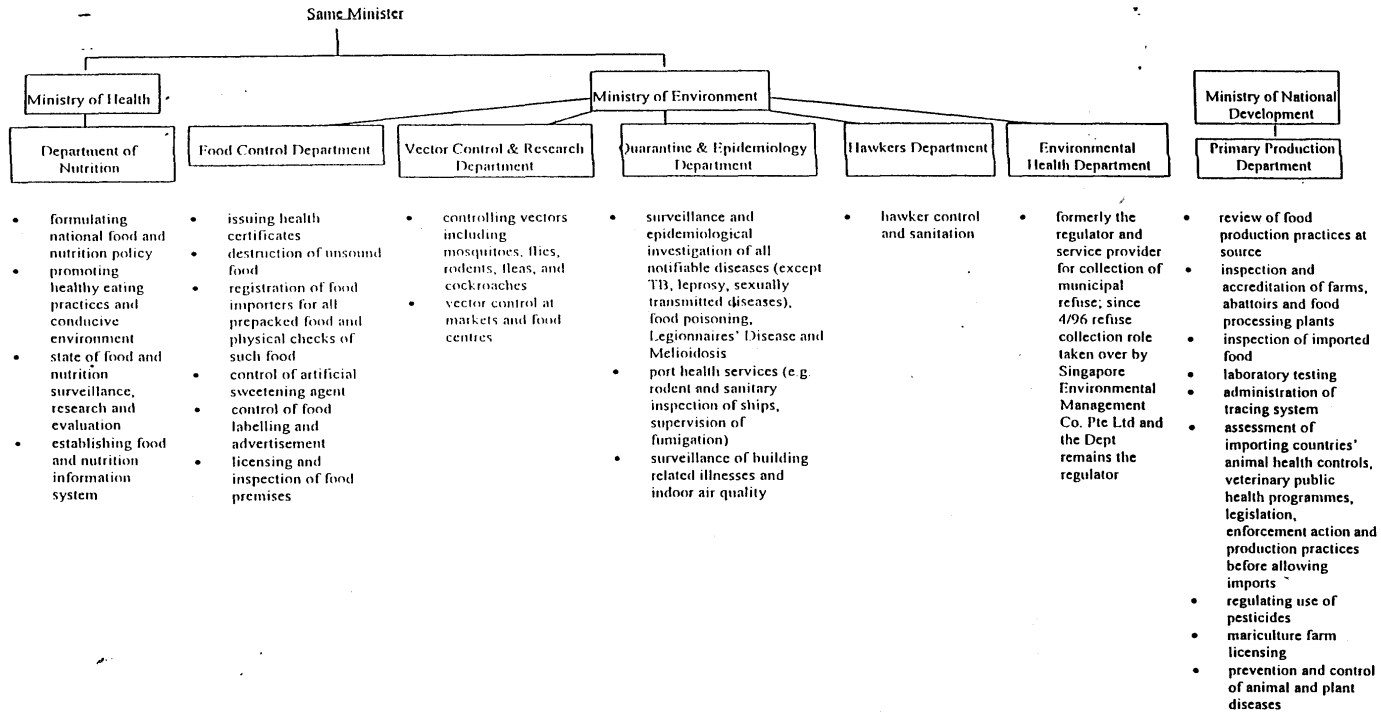
All food handlers of eating establishments in Singapore are required to attend a basic food hygiene course conducted by the Ministry of the Environment. Besides the Ministry, a few organisations, including the Society, are also allowed to conduct the course but the course participants are required to sit for a common test set by the Ministry. However, participants of the course conducted by the Society are exempted from taking the common test if they have passed the test set by the Society.

All the best.

Yours sincerely

CHIA CHIN BOEY  
HON SECRETARY

**Food Safety & Environmental Hygiene - Singapore Model**  
( The Consultant's version )



Letterhead of UMEA UNIVERSITY  
Department of Environmental Health  
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*From* Christer Andersson UMEA UNIVERSITY

*Pages including first page* 1

*Date:* 1999-10-01

Dear Mr Ku

One of our last year students, Erika Backman, would like to study how the Department of environmental health works in Hong Kong. She would like to see what kind of problems you are facing, regarding for example environment protection, food safety and health questions. It would be of great interest for Her to see how problems are solved and how the organisation and legislation works. We would appreciate if you could help us arrange a professional training for five weeks, sometimes in February or March year 2000.

The trip and the accommodation will be financed by scholarship and by the student her self. I would like to know if it is possible to arrange a short training period for her Please contact me if you are interested or if you have further questions.

My Best regards

Christer Andersson  
Lecturer, BSc and responsible for the practical training in our program

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