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***Direct Investigation Report
Food and Environmental Hygiene Department's System
of Safety Control for Imported Fruits and Vegetables***



A direct investigation by the Office of The Ombudsman has found inadequacies in the Food and Environmental Hygiene Department (“FEHD”)’s sampling checks on fruits and vegetables imported by land and its surveillance on those by sea. Laboratory tests also take a long time when samples are sent to the Government Laboratory. Moreover, no clear regulatory standards have been set for some vegetables commonly consumed in Hong Kong. The current maximum limit of “lead” in leafy vegetables under the law is 20 times more lenient than the level recommended by the Codex Alimentarius Commission. Such a statutory standard is seriously outdated.

The Ombudsman has made eight recommendations to FEHD regarding inspection and statutory standards for more effective regulation of imported fruits and vegetables.

The executive summary of the investigation report is at **Annex 1**.

***Summary of Investigation Report
Complaint about the Handling of an Application for Housing
Transfer by Social Welfare Department and Housing Department***



When a public rental housing tenant applies for flat transfer on social or health grounds, the Housing Department (“HD”) will refer the application to the Social Welfare Department (“SWD”) or a service unit under SWD-approved non-governmental organisations for assessment and recommendation, or for provision of the necessary welfare service.

This Office completed recently an investigation into a case relating to an application for flat transfer. In the case, the complainant's family applied to HD for flat transfer on grounds of health of a family member. The Department referred the case to SWD for assessment. SWD and its subvented integrated family service centre ("IFSC"), however, adhered too rigidly to the administrative procedures of the referral system, thereby causing delay in providing the assistance that the complainant's family needed. In addition, the accounts of HD and SWD/the IFSC regarding the telephone communications between HD and the IFSC differed significantly, showing that there were communication problems between the parties.

The Ombudsman has made four improvement recommendations to HD and SWD.

The summary of the investigation report is at **Annex 2**.



Enquiries

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Office of The Ombudsman
13 November 2017

Executive Summary

Direct Investigation into Food and Environmental Hygiene Department's System of Safety Control for Imported Fruits and Vegetables

Introduction

Fruits and vegetables are commonly consumed in Hong Kong and most of them are imported. Given its impact on public health, food safety must not be overlooked. This direct investigation serves to examine whether there is any inadequacy in the Food and Environmental Hygiene Department ("FEHD")'s system of safety control for imported fruits and vegetables, in particular, whether there are deficiencies in the Department's gatekeeping efforts at the point of arrival of imported fruits and vegetables in Hong Kong, with a view to making recommendations for improvement.

Our Findings

The Current System

Relevant Legislation

2. The main ordinances governing imported food include the Public Health and Municipal Services Ordinance ("PHMSO") and the Food Safety Ordinance ("FSO"). Both are enforced by FEHD.
3. By virtue of PHMSO, the Government has drawn up the Pesticide Residues in Food Regulation ("PRFR"), which stipulates the chemical standards for the composition of food, as well as the Food Adulteration (Metallic Contamination) Regulations ("FAMCR"), which regulate the levels of metals present in food.
4. PHMSO empowers FEHD to take samples of food for laboratory tests to ensure their compliance with the statutory safety standards. The Department can prosecute the supplier(s) of unsafe food.
5. FSO confers power on the Director of Food and Environmental Hygiene to make an order to prohibit the import and/or supply of any food for the period specified in the order, and/or direct that any food supplied be recalled and destroyed.

Safety Control for Imported Fruits and Vegetables

6. According to FEHD's risk assessments, fruits and vegetables are not considered high-risk foods. Hence, prior permission of the Department is not required for importing them into the territory.

7. The Centre for Food Safety (“CFS”) under FEHD takes samples of fruits and vegetables at the point of their arrival in Hong Kong and at the wholesale and retail stages. A risk-based principle is adopted in determining the types of samples to be collected, the frequency of sampling, the number of samples to be taken and the types of laboratory analysis to be conducted. CFS devises a “Food Surveillance Programme” annually, taking into account past food surveillance results, local and overseas food incidents and the relevant food risk analyses.

8. After a “Food Surveillance Programme” is endorsed, the relevant units of CFS would meet regularly to discuss details of the sampling checks and the scope of sampling. Having consulted the Government Laboratory (“Govt Lab”), CFS would draw up an annual sampling plan, setting out the pesticide residues/heavy metals on which all work units must conduct sampling checks each week. The plan also includes a checklist of the fruits and vegetables that are likely to be tainted with such pesticide residues/heavy metals.

9. Fruits and vegetables imported by sea, land and air are subject to sampling checks by CFS officers at the point of their arrival in Hong Kong and at the wholesale and retail stages. This direct investigation focuses on CFS’s procedures of sampling fruits and vegetables at the point of their arrival.

10. Sampling checks on fruits and vegetables upon arrival in Hong Kong are conducted by CFS at Kwai Chung Food Control Checkpoint (“Kwai Chung Checkpoint”, for those imported by sea), Man Kam To Food Control Office (“Man Kam To Office”, for those imported by land) and the Airport Office (for those imported by air). Samples taken by CFS officers at the above locations are sent to Govt Lab or Man Kam To Food Laboratory (exclusively for samples taken at Man Kam To Office) for laboratory tests.

“Maximum Residue Limits” of Pesticide

11. Regarding food safety standards, Schedule 1 to PRFR contains a list of about 400 food types (including “food groups”, “food subgroups” and “specific food”) and 360 types of pesticides, and specifies the “maximum residue limits” (“MRLs”) for over 7,000 pesticide-food pairs. For pesticides, PRFR mainly adopts MRLs established by the Codex Alimentarius Commission (“Codex”), supplemented by standards set by other major food importing countries and regions (such as Mainland China, Thailand and the United States).

12. A supplier of food that contains pesticide residues exceeding MRLs specified in the aforementioned Schedule 1 commits an offence and may be prosecuted by FEHD.

Food Types and “Pesticide-food Pairs” outside Schedule 1

13. For any food types and “pesticide-food pairs” not covered by Schedule 1, FEHD would consider a number of factors (including the nature of the pesticide, the mode of

consumption of the food in question, and information provided by international food or hygiene authorities) in conducting risk assessments. The assessments are based on “safe reference values”, such as “acceptable daily intake” (i.e. the estimated amount of a certain chemical in food or drinking water that can be ingested daily over a lifetime without appreciable health risk to the consumer) or “acute reference dose” (i.e. the amount of a substance that can be ingested over a short period of time without appreciable health risk to the consumer). Should the result of an assessment show that consumption of the food in question is dangerous or harmful to health, FEHD would consider prosecuting the food supplier.

Our Observations and Comments

14. Fruits and vegetables sold in Hong Kong are of great variety and quantity, and hence extensive inspections are not practicable. However, since fruits and vegetables are so commonly consumed and most of them are imports, the public greatly relies on strict gatekeeping by the Government through its establishing and implementing an effective surveillance as well as checking system to ensure that imported fruits and vegetables pose no health risk.

15. This Office has found the following inadequacies with regard to FEHD’s regulation and surveillance of imported fruits and vegetables.

(1) Inspection and Enforcement Management

Inspection of fruits at Man Kam To Office too lax; sampling checks on vegetables ineffective

16. Unlike lorries importing vegetables, few lorries importing fruits from the Mainland enter Man Kam To Office to allow the fruits to be inspected when they arrive in Hong Kong. To plug this loophole, we consider that FEHD should make greater efforts to subject more fruit lorries to inspection at Man Kam To Office.

17. Our onsite observations revealed that with regard to the sampling check procedures, there was a heavy flow of lorries with vegetables driving through Man Kam To Office. To minimise the duration of stay of the lorries at the Office for inspection, the officers there conducted their sampling at a very hasty pace, and the workers of FEHD’s contractor just took out several crates of vegetables from close to the doors of the storage compartments of the lorries for inspection. As a result, those vegetables at the inner part of the storage compartments could easily evade inspection. We consider that FEHD should issue guidelines instructing its officers how to carry out effective sampling on fruits and vegetables at inner parts of storage compartments of lorries, so as to reduce the chance of problematic fruits and vegetables evading the sampling checks.

No routine checks on fruits and vegetables imported by sea and surveillance inadequate

18. At present, for fruits and vegetables imported by sea, FEHD does not conduct routine checks at Kwai Chung Checkpoint or at importers' warehouses/cold storages. Samples would only be taken for laboratory tests where there is a special need to do so (e.g. on receipt of intelligence and information about food safety incidents in nearby regions). Rather, the Department chiefly takes samples at wholesale and retail outlets for testing. However, such samples actually cover fruits and vegetables imported by sea, land and air. This shows that FEHD does not have fruits and vegetables imported by sea as a specific target for checking. FEHD's system of sampling checks on fruits and vegetables imported by sea is clearly rather lax compared with those for fruits and vegetables imported by air and land. As a result, most of the fruits and vegetables imported by sea would have already entered the market for public consumption before having undergone any inspection. This situation is undesirable. The saving grace is that after our commencement of investigation, FEHD has started a trial scheme in the recent months to conduct sampling of fruits and vegetables imported by sea at importers' warehouses/cold storages. That has at least provided some additional safeguard for public health.

19. We hope that FEHD will develop the aforementioned trial scheme into a regular mechanism and take more samples of fruits and vegetables imported by sea at importers' warehouses/cold storages in order to strengthen its surveillance of such fruits and vegetables at the point of their arrival in the territory.

20. Moreover, while fruits and vegetables at wholesale outlets may be imported by sea, land or air, we believe that it should not be difficult to tell which of them are actually imported by sea, for example, those that are cheaper, more bulky and are imported from Southeast Asian countries. Given that the existing surveillance of fruits and vegetables imported by sea is less stringent, FEHD when conducting sampling at wholesale outlets may as well focus on those fruits and vegetables believed to be imported by sea. This will help further remedy the inadequacy of inspection at Kwai Chung Checkpoint.

Lengthy process from sending samples to Govt Lab to completion of laboratory tests

21. We find it crucial that results of laboratory tests on food samples are made available quickly. In case any food sample is thus found to be below the standards, CFS staff can promptly try to stop the fruits and vegetables of the same batch from going into the market, and those already in the market can be removed, recalled or destroyed as soon as possible so that such problematic food will not be sold to the public. At present, test results of only samples taken at Man Kam To or collected in case of emergencies or in light of food incidents in other locations can be made available within two working days. In all other cases, it generally takes 19 working days from sending samples to Govt Lab to the release of test results. Meanwhile, many fruits and vegetables from the same batch may have been sold in the market.

22. We understand that delivery of food samples and the testing process take time. However, to minimise the public's anxiety over consumption of problematic fruits and vegetables, we expect FEHD to work with Govt Lab to speed up the testing of food samples as far as possible, so that there would be no need to wait for 19 working days every time. An ultimate solution would be for FEHD to explore with Govt Lab the possibility of putting more resources (including manpower, machinery, space, etc) to speed up laboratory tests on food samples.

(2) Statutory standards

Absence of clear regulatory standards for some commonly consumed vegetables in Hong Kong

23. At present, CFS adopts two methods in regulating pesticide residues in food: one is to specify MRLs for various types of food in Schedule 1 to PRFR, and the other is to conduct "risk assessments". We believe that both methods have scientific justifications. Nevertheless, compared with the first method, the results of "risk assessments" carry more uncertainties because various factors have to be considered for each and every assessment. For example, lotus roots and bean sprouts, two commonly consumed vegetables, have yet to be listed on Schedule 1 along with MRLs of pesticide. They can only be regulated through "risk assessments", and this may affect the degree of protection of public health.

24. According to FEHD, Codex has recently categorised lotus roots and bean sprouts under "root and tuber vegetables" and "leafy vegetables" respectively in July 2017. CFS would need to conduct further study and seek expert advice before deciding whether it would follow Codex's latest categorisation of lotus roots and bean sprouts and amend PRFR by putting those two types of vegetables under its regulation. We consider that FEHD should making such legislative amendment as soon as possible so as to include lotus roots and bean sprouts in Schedule 1 for proper regulation.

25. Furthermore, to enhance food safety for the public and provide clearer instructions to the farming practices of the trade, we consider that FEHD, being the gatekeeper of food safety, should be more flexible than just adopting Codex's food categories. FEHD should extend the scope of regulation under Schedule 1 to PRFR, which serves to set clear standards for the public and the trade. For instance, FEHD should consider setting MRLs for pesticides and metallic contaminants for fruits and vegetables commonly consumed in Hong Kong based on the items and standards of food regulation adopted by Mainland authorities for food safety control as well as the latest categorisation of food in countries/regions from which fruits and vegetables are imported into Hong Kong. These should then be included in the Schedules to the respective laws for enforcement and regulation.

Lax and seriously outdated statutory standards for food safety

26. We notice that regulation of metallic contaminants was imposed and set out in Schedule 2 to FAMCR in as early as 1997, and for 20 years has not been updated to keep up with the times. Take “lead” as an example, Codex has set the maximum limit of “lead” in leafy vegetables at 0.3 mg per kg of vegetables while under Hong Kong laws the maximum limit is 6 mg per kg. CFS has not followed Codex’s standards and the Centre’s existing standard is 20 times more lenient than Codex’s.

27. The saving grace is that, the Government has recently proposed legislative amendments in accordance with Codex’s standards. Hopefully, there will be more stringent regulation of the content of “lead” in leafy vegetables.

Recommendations

28. Based on the above analysis, The Ombudsman urges FEHD to:

- (1) collect more samples of fruits at Man Kam To Office for testing;
- (2) issue guidelines instructing officers how to conduct more effective collection of samples of fruits and vegetables in storage compartments of lorries (including those placed deep inside) in order to reduce the chance of problematic fruits and vegetables evading sampling checks;
- (3) collect more samples of fruits imported by sea at importers’ warehouses/cold storages;
- (4) when conducting sampling at wholesale outlets, focus on those fruits and vegetables believed to be imported by sea, so as to further remedy the inadequacy of inspection at Kwai Chung Checkpoint;
- (5) where feasible, try to minimise the time for sending samples of fruits and vegetables to Govt Lab and discuss with the latter the possibility of putting more resources (including manpower, machinery, space, etc) to speed up laboratory tests on food samples;
- (6) include lotus roots and bean sprouts in Schedule 1 to PRFR as soon as possible based on Codex’s categorisation of those two types of vegetables;
- (7) adopt Codex’s existing standards for the content of “lead” in leafy vegetables and amend FAMCR as soon as possible to better safeguard public health in Hong Kong; and

- (8) continue to strive to extend the scope of regulation under the Schedules to the relevant laws in order to cover more local food categories, by drawing reference, for example, from the requirements of Mainland authorities on food safety surveillance and the latest categorisation of food in countries/regions from which vegetables and fruits are imported into Hong Kong, and setting MRLs for pesticides and metallic contaminants in any fruits and vegetables commonly consumed in Hong Kong for inclusion in the Schedules to the relevant laws for enforcement and regulation.

Office of The Ombudsman
November 2017

Summary of Investigation Report

Complaint about the Handling of an Application for Housing Transfer by Social Welfare Department and Housing Department

Foreword

The Housing Department (“HD”) and the Social Welfare Department (“SWD”) have established between themselves an inter-departmental referral system for handling special cases relating to housing assistance (including applications for public housing transfer). Under the system, HD would first conduct eligibility checks and vetting on applications. For applications which would usually be rejected under the existing housing policy but which involve social or health factors worthy of consideration, or in which the clients have social welfare needs, HD, with the consent of the clients, would refer them to SWD or service units under SWD-approved non-governmental organisations (“NGOs”) for assessment and recommendation, or for provision of the services needed.

2. In this complaint case, the complainant’s family applied to HD for transfer on grounds of health of a family member. HD referred the case to SWD for assessment. Our investigation found no delay on the part of HD as it had processed the application in accordance with its existing housing policy and established procedures. Nevertheless, SWD and the integrated family service centre (“IFSC”) it subsidised had adhered too rigidly to the administrative procedures of the referral system, thereby causing delay in delivering the service that the complainant’s family needed.

The Complaint

3. The four-person family of the complainant (“Ms A”) originally lived in a public rental housing flat. One family member suddenly passed away in the flat. Another family member (“Ms B”) witnessed the incident, became emotionally disturbed calling for medical treatment and counselling, and did not want to stay any longer in the flat. Ms A and her family then applied to HD for internal transfer within the same estate. HD referred the case to an SWD-subvented IFSC for assessment. Ms A’s family (now with only three persons) was recommended after assessment internal transfer to a flat with a layout different from that of their current flat.

4. Since no flat was allocated to her family, Ms A lodged a complaint with this Office against HD for delay in processing her application, and for its lack of proper communication with SWD such that the latter did not provide any assistance in her application for transfer.

Our Findings

Major Course of Events

5. In November **2014**, HD received the application for internal transfer from Ms A's family. In December, the case was referred to the IFSC for assessment.
6. In February **2015**, the IFSC notified SWD that it would recommend that Ms A's family be transferred to a flat of a layout different from that of their current flat in the same estate, in order that the change in environment would help Ms B's recovery. SWD then notified HD of the assessment result.
7. In April, the IFSC confirmed with Ms A's family that they had no other service needs for the time being. The Centre thus closed their case.
8. In October, HD suggested that Ms A's family be transferred to a three-person flat in a different block in the same estate (the flat was smaller than their current one). They rejected the offer on the ground that its layout was the same as that of their current flat and this might arouse Ms B's anxiety.
9. In December, HD suggested that Ms A's family be transferred to another flat that, despite having the same size and layout as their current flat, faced a different direction and was on a different floor. It also indicated that it could invite a social worker to accompany Ms B to visit the flat in advance. Ms A rejected the idea because she was worried that the visit would cause emotional distress in Ms B and because she could not understand the reasons behind HD's arrangement.
10. In January **2016**, HD wrote to SWD to explain that according to flat allocation policy, it could not allocate a flat of different layout and a size well above the prescribed standard to Ms A's family unless on very special social grounds. HD suggested that SWD arrange for a social worker to accompany Ms A's family to visit the aforementioned flat in order to assess whether it could meet their needs.
11. Upon receipt of SWD's referral, the IFSC telephoned HD to clarify the purpose of the referral. After some exchanges, the IFSC asked HD to discuss with Ms A's family first and obtain their consent to the visit before it would handle the referral and related arrangements.
12. In March, HD received the written consent of Ms A and Ms B. It then again referred their case to the IFSC for assistance. In the end, however, the IFSC still did not contact Ms A's family and take follow-up action.
13. In September, Ms A lodged her complaint with this Office against HD and SWD because the application for transfer was still outstanding.

HD's Response

14. HD explained that under the existing housing policy, if an application for transfer is approved, the applicant would usually only be allocated a flat **of the same type** as his/her current flat (i.e. a flat of a size commensurate with the family size). Unless there are very special grounds, HD would not easily deploy extra housing resources to allocate a flat bigger than the standard prescribed for the applicant's family size.

15. With regard to this case, HD considered that it would have followed SWD's recommendation for transfer to "a flat of different layout" if it allocated to Ms A's family a flat that was different in direction, floor level and view from their current flat, coupled with a layout of their own construct (they were free to refurbish the interior layout except for the bathroom, kitchen and balcony, which were fixed spaces). HD had already allocated flats to Ms A's family twice but both offers were not accepted. Besides, HD staff had repeatedly telephoned the IFSC and SWD between January and July 2016 to request their assistance in the case, including arranging for a social worker to accompany the family to visit one of the flats. Nevertheless, HD received no positive feedback.

Response of SWD and IFSC

16. In response, SWD and the IFSC indicated that the latter has handled cases referred by HD according to the cooperation agreement drawn up at regular meetings between SWD, HD and representatives of relevant NGOs. The agreement requires HD to state clearly the purpose of referrals and to obtain the written consent of the clients, lest the tenants/applicants would have unrealistic expectations.

17. Since witnessing for HD an applicant's refusal of a housing offer was not part of social workers' duties, while HD had not obtained the consent of Ms A's family on the arrangements of referral and flat visit in January 2016, the social worker, therefore, suggested that HD first clarify with the family the purpose of this referral and obtain their consent. Only then would the social worker contact them and take follow-up action.

18. Subsequently, HD referred the case again in March 2016 and attached the written consent of Ms A and Ms B, but it still did not state what kind of service was required from the IFSC. After enquiries with HD, the IFSC realised that HD's intention in making this referral was for the IFSC to assess the social needs of Ms A's family in respect of their application for transfer to a **different type** of flat within the same estate. Considering that the assessment and recommendation made in February 2015 (see **para. 6**) had already served the same purpose, the IFSC found no justification to repeat its recommendation.

19. Besides, the IFSC had closed the case of Ms A's family earlier on, and had not directly received from them any request for assistance. Therefore, unless there was

clarification for HD's intention in this renewed referral and confirmation of the family's written consent, the IFSC would not contact the family and follow up.

20. SWD and the IFSC refuted HD's account of the event in **para. 15** above, noting that between January and July 2016 HD had never made any telephone call to SWD or the IFSC to discuss the case of Ms A's family.

21. On the whole, SWD considers the IFSC to have handled this case in accordance with the agreed referral system.

Our Comments

22. HD has the responsibility to allocate housing resources in a prudent and fair manner according to the established housing policy. Hence, HD must first ascertain that Ms A's family could not accept any flat of the same type before approving their transfer to a different type of flat, as that would involve extra housing resources. From the perspective of administration, we consider that HD has not delayed in handling this application for transfer when following up the case.

23. As regards SWD, its responsibility is to monitor and ensure that the IFSC under its subvention has followed up the case of Ms A's family in a proper and timely manner to facilitate their earliest possible transfer to a flat that meets their needs, especially one that would help Ms B's recovery. However, we have identified certain problems in SWD's current views on how the IFSC should handle the cases referred by HD.

24. According to the agreement drawn up at the regular meetings, HD is required to state clearly the purpose of referrals and obtain the written consent of the clients. The objective is to avoid fostering any unrealistic expectation among tenants/applicants about the service. Notwithstanding this, the agreement has not stipulated that "for the same client on the same subject" (such as the application for transfer by Ms A's family in this case), HD must obtain written consent from the clients again and state the reason for each referral. We consider that where there is no sign of unrealistic expectations or even abuse of service by the clients, and the referrals made by HD at different stages are related to the same subject, SWD should put the applicants' well-being first and proactively follow up their cases, rather than insisting that each referral must rigidly follow all the procedural requirements.

25. Regarding this case, Ms A's family never asked SWD for assistance, and it did not appear that they might have unrealistic expectations about the service. Judging from HD's memoranda for the two referrals made in 2016, we consider that the IFSC should be able to fully understand the purpose of HD's referrals and its request for a social worker to accompany Ms A's family on a visit to the proposed flat. HD was seeking the social worker's assistance in assessing whether the family (especially Ms B) would still feel unacceptable a flat of basically similar layout despite having a different direction and view. If so, HD would need to exercise discretion and allocate a type of

flat different from their current one. We can hardly see why the IFSC found it necessary to request HD to clarify the reason of referral and obtain consent from Ms A's family again. In fact, there are no such stringent requirements in the agreement (see **para. 24**).

26. We consider that Ms A's family would not have needed to wait until April 2017 before being recommended for transfer again if the IFSC had not stubbornly adhered to procedural requirements of the referral system time and again and, rather, had paid more attention to the family's needs and difficulties and actively contacted them to understand better whether Ms B was indeed unable to accept any flat of the same type and notify HD of the result. That would have helped HD to consider other feasible options.

Conclusion and Recommendations

27. In the light of the above analysis, we consider Ms A's complaint against HD unsubstantiated, and her complaint against SWD partially substantiated.

28. Moreover, regarding whether there was any telephone communications between HD and SWD/the IFSC, the two sides gave different accounts of the event, which bordered on pointing the finger at each other. It is worrying whether HD and SWD/the IFSC can maintain mutual trust and cooperation in future. We urge all three parties to review this case with candour and rebuild their cooperative relations.

29. The Ombudsman has made the following recommendations to HD and SWD:

HD and SWD

- (1) To review the communication problems revealed in this case with candour and mend their cooperative relations.
- (2) To jointly review the existing cooperation agreement regarding the referral system to clarify in what circumstances, when making repeated referrals for the same case, HD is required to obtain written consent from clients and state the purpose of referral again. The basic premise is to minimise any duplicate administrative procedures as far as possible.
- (3) To consider holding face-to-face discussions promptly in future to clarify issues regarding how to handle those cases on which no consensus can be reached between the two departments, so as to avoid affecting case progress.

SWD

- (4) before completion of the abovementioned review, to remind all the IFSCs to proactively assist their clients and properly handle the

requirements about written consent according to actual circumstances of each case, and also to state the reason of referral, so as to prevent delay in providing the necessary services to clients due to overly rigid adherence to procedural requirements.

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