

Section 1 – Introduction

Background

1.1 The Election Committee (“EC”) is constituted in accordance with the Basic Law of the Hong Kong Special Administrative Region (“HKSAR”) of the People’s Republic of China (“Basic Law”) and the Chief Executive Election Ordinance (Cap. 569) (“CEEEO”). Annex I to the Basic Law and section 9 of the CEEEO stipulate that the term of office of the EC shall be 5 years. For the EC constituted in 2021, its term of office began on 22 October 2021 and will end on 21 October 2026. The EC members are responsible for nominating Chief Executive (“CE”) candidates, electing CE, nominating Legislative Council (“LegCo”) candidates, and electing 40 LegCo members for the EC Constituency.

1.2 The term of office of the seventh-term LegCo will conclude by the end of 2025. The CE, in accordance with section 6(1) of the Legislative Council Ordinance (Cap. 542), has specified 7 December 2025 as the date for holding the general election for the eighth-term of office of the LegCo. Since the EC members are responsible for nominating LegCo candidates and electing 40 LegCo members, therefore, an EC Subsector Supplementary Nomination and the Election Committee Subsector By-elections (“the By-e”) ought to be held before the 2025 Legislative Council General Election (“LCGE”) in accordance with sections 4 and 5 of the Schedule to the CEEEO, to fill the vacancies in the membership of the EC.

1.3 According to section 4 of the Electoral Affairs Commission (Electoral Procedure) (Election Committee) Regulation (Cap. 541I) (“EAC (EP) (EC) Reg”), the Chief Electoral Officer (“CEO”) published in the Gazette on 4 July 2025 a notice announcing that the By-e would be held on 7 September. The nomination period lasted for 14 days from 22 July to 4 August 2025. In addition, the Electoral Registration Officer (“ERO”), in accordance with section

14(1AB) of the Schedule to the CEEO, specified 24 June 2025 as the publication date of the 2025 provisional register (“PR”) of voters for the EC subsectors; and 21 July of the same year as the publication date of the final register (“FR”) of voters for the EC subsectors, so that the By-e held on 7 September could be conducted on the basis of the latest voter situation.

The vacancies

1.4 The By-e needed to fill a total of 93 vacancies in the membership of the EC to be returned by election involving 28 subsectors. In addition, a total of 10 vacancies involving 5 subsectors would be returned through supplementary nominations by designated bodies. The vacancies details are listed in **Appendix I**.

The Scope of the Report

1.5 The Electoral Affairs Commission (“EAC”) is required under section 8(1) of the Electoral Affairs Commission Ordinance (Cap. 541) (“EACO”) to submit a report on the By-e to the CE within three months of the conclusion of the elections.

1.6 This report outlines how the EAC at various stages conducted and supervised the By-e. It also gives a detailed account of the preparatory work, implementation of electoral arrangements and handling of complaints of the By-e. Based on the experience gained and a review of the effectiveness of various electoral arrangements, the report sets out the EAC’s recommendations for improving future elections.

Section 2 – The Legislation and The Guidelines

Legislative Amendments

Relevant Amendments on the Safeguarding National Security Ordinance

2.1 In relation to the Safeguarding National Security Ordinance that took effect upon its gazettal on 23 March 2024, the provisions relating to the ECSS By-e, including sections 5M(1)(ab), 9(1)(ab) and 18(1)(ca) of the Schedule to the CEEO, were duly amended, updating the circumstances when a person is (i) disqualified from being registered as an ex-officio member; (ii) disqualified from being a nominee; and (iii) disqualified from being a subsector candidate.

Electoral Legislation (Miscellaneous Amendments) Ordinance 2025

2.2 The Electoral Legislation (Miscellaneous Amendments) Ordinance 2025 (“the 2025 Ordinance”) took effect upon its gazettal by the government on 2 May 2025. It aims at enhancing the efficiency by optimising the electoral arrangements, and ensuring the elections would be conducted in an open, honest, fair, safe and orderly manner. The amendments relating to the EC Subsector Elections include the following items:

- (a) Amending the EAC (EP) (EC) Reg to provide for the consolidation of ballot paper accounts to enhance counting arrangements. With the amendment, a Presiding Officer (“PRO”), after the close of poll, will only be required to compile one consolidated ballot paper account for ballot papers of all subsectors cast at the polling station concerned and will no longer

need to compile a ballot paper account for each individual subsector. This will not only alleviate the PRO's workload and shorten the time for compilation, and reduce the number of ballot paper accounts to be handled and verified during the handover procedures at the central counting station ("CCS"), but also fully harness the capabilities of the counting machines to undergo collective counting without prior manual sorting of ballot papers by subsectors, thereby achieving not only the goal of ensuring fairness and impartiality of elections but also further enhancing counting efficiency. In addition, the PROs can prioritise the delivery of ballot boxes and the ballot paper account to the CCS after the poll according to the newly amended statutory provisions. Other sealed packets, which previously had to be delivered together with the ballot boxes, can now be delivered separately. This arrangement allows ballot boxes to be delivered from polling stations to the CCS earlier, enabling the counting process to commence sooner; and

- (b) Amending the Electoral Affairs Commission (Registration) (Electors for Legislative Council Functional Constituencies) (Voters for Election Committee Subsectors) (Members of Election Committee) Regulation (Cap. 541B) ("EAC (ROE) (FCSEC) Reg"), the CEEO and the Election Committee (Registration) (Voters for Subsectors) (Members of Election Committee) (Appeals) Regulation (Cap. 569B) to improve the arrangements for publication of the EC subsector registers. The new provision empowers the ERO to advance by means of Gazette

notice the deadlines for specific registration procedures related to EC subsector registers in the year of LCGE.

Electoral Guidelines

2.3 Under section 6(1)(a) of the EACO, the EAC is empowered to issue electoral guidelines to facilitate the conduct and supervision of an election. The purpose of issuing electoral guidelines is to ensure that all public elections are conducted in an open, honest and fair manner. The electoral guidelines are not law, and cover the following two aspects: (i) to explain in simple language the subsisting electoral legislations so as to remind candidates and other stakeholders of the provisions and requirements under the electoral legislations, and (ii) to promulgate a code of conduct based on the principle of fairness and equality with regard to election-related activities not covered by the legislations.

Guidelines on Election-related Activities in respect of the Election Committee Subsector Elections and the Supplementary Information

2.4 The Guidelines on Election-related Activities in respect of the Election Committee Subsector Elections (“the Guidelines”) published in July 2021 are still applicable to the By-e. However, the EAC has also compiled the Supplementary Information to the Guidelines for the By-e to reflect the amended legislative provisions, and the updates made by the EAC to other public electoral guidelines which are applicable to the latest requirements and arrangements of the By-e.

2.5 The Supplementary Information, as compared with the Guidelines issued in July 2021, has incorporated major amendments covering three main areas:

- (a) Amendments made pursuant to the changes in electoral legislations;
- (b) Amendments made to align with other electoral guidelines; and
- (c) Amendments made to reflect the new electoral arrangements and procedures.

2.6 The EAC uploaded the Supplementary Information onto the EAC website on 4 July. The Registration and Electoral Office (“REO”) also uploaded it onto the dedicated election website on the same day for public inspection, and distributed to the candidates for perusal since the commencement of the nomination period for the By-e.

Section 3 – The Election Committee

The Election Committee and Subsectors

3.1 The EC is constituted in accordance with the Basic Law and the CEEO. The EC members are eligible to nominate and vote in the Chief Executive Election, as well as nominate candidates for LegCo members and elect 40 of the Legco members. The EC is composed of 1 500 members from 40 subsectors across 5 sectors. The EC members are returned by the following 3 methods:

- (a) Holders of the specified offices of the subsectors as the ex-officio members

The ex-officio members comprise HKSAR deputies to the National People's Congress ("NPC"), HKSAR members of the National Committee of the Chinese People's Political Consultative Conference, Hong Kong members of the Committee for the Basic Law of the HKSAR under the Standing Committee of the NPC, LegCo members, university vice-chancellors/ presidents/ chairpersons of the board of governors or the councils of universities, and responsible persons of statutory bodies, major advisory committees and other relevant bodies of certain subsectors as specified in the electoral legislations;

- (b) Nominated by the designated bodies of the subsectors

All members of the religious subsector and the representatives of associations of Hong Kong residents in the Mainland subsector, and some members of the accountancy subsector, Chinese medicine subsector, legal subsector, sports, performing arts, culture and publication subsector and technology and innovation

subsector shall be nominated by the designated bodies in their respective subsectors; and

- (c) Elected by eligible corporate or individual voters in the subsectors

The rest of the EC members shall be elected by eligible corporate voters or individual voters of their respective subsectors.

Details of the composition of the EC are set out at **Appendix II**.

Registration of Ex-officio Members

3.2 There were 377 seats for ex-officio members in the current EC (i.e. constituted in 2021). To register as ex-officio members, persons eligible for registration as ex-officio members should submit registration forms to the ERO, and the validity of their registrations shall be determined by the Candidate Eligibility Review Committee (“CERC”). The ERO will from time to time update the FR of EC members to give effect to any change in the ex-officio membership of the EC, including the addition and removal of names of incoming and outgoing ex-officio members on the FR of EC members.

Members Nominated by Designated Bodies

3.3 In addition, there are 156 seats for nominated members in the EC. Members are returned by nomination by the designated bodies of the relevant subsectors. According to section 3 of the EAC (EP) (EC) Reg, the CEO published in the Gazette on 4 July 2025 a notice announcing that there were 10 vacancies involving 5 subsectors to be returned through supplementary nominations by designated bodies, and the relevant information was uploaded onto the dedicated election website for the By-e.

3.4 During the nomination period for the supplementary nomination of the ECSS, Returning Officers (“ROs”) received a total of 8 nomination forms from the designated bodies, involving a total of 11 nominees. Based on the order of priority as indicated by the designated bodies, the CERC was only required to determine, and accordingly determined, that 10 nominees were validly nominated to fill the vacancies for the subsectors. The list of validly nominated nominees published in the Gazette on 11 August 2025 is at **Appendix III**.

Registration of Voters for Subsectors

3.5 The CEEO stipulates that a PR and a FR of voters for subsectors must be published annually. Detailed procedures for registration of voters for the subsectors are set out in the EAC (ROE) (FCSEC) Reg. Starting from the 2022 voter registration (“VR”) cycle, the statutory deadlines for applications for new registration and for report on change of particulars are both generally set for 2 June of the year. The ERO is required to publish the PR of voters for subsectors together with an omissions list (“OL”) not later than 1 August, and the FR of voters for subsectors not later than 25 September. However, the 2025 Ordinance empowers the ERO to suitably advance the publication of the registers of voters for EC Subsectors in the year of the LCGE through accelerating part of the working procedures, so that the ECSS By-e of the year can be conducted on the basis of the most updated information included in the registers without having to adopt the register published the year earlier.

3.6 To enable the By-e be conducted on the basis of the latest voter situation, the ERO published in the Gazette on 24 June 2025 a notice announcing that the PR of voters for subsectors and the OL for the year of 2025 were published on the same day for inspection by specified persons or members of the public until 30 June. Before the statutory deadline for lodging a claim or an objection, all persons might lodge with the ERO objections to the entries in the PR of voters,

and any persons whose particulars were not recorded in the PR of voters or whose names were included in the OL might also lodge claims for ruling by the Revising Officer in order to reinstate their VR. By the statutory deadline of 30 June 2025, the ERO did not receive any notice of claims or notice of objection, and subsequently published the FR of voters for subsectors on 21 July, which contained 8 877 registered voters.

3.7 These 8 877 registered voters were eligible to make nomination at the ECSS Elections and to vote at the By-e on 7 September, unless they had been disqualified from doing so under the law. The FR of voters for subsectors will continue to have effect until the publication of the next FR of voters for subsectors. A breakdown of the number of voters for the EC subsectors is at **Appendix IV**.

Voters Disqualified from Voting at the 2025 Election Committee Subsector By-elections

3.8 In accordance with section 30(1)(a) of the Schedule to the CEEO, a registered voter for a subsector is disqualified from voting at the relevant subsector election if he/she has ceased to be eligible to be registered as a voter for that subsector.

3.9 The FR of voters was published on 21 July 2025 while the By-e was held on 7 September of the same year. During the period, there might be changes in the registration eligibility of voters for individual subsectors. To this end, the ERO issued letters to designated bodies of the contested subsectors in early-August, requesting them to keep the REO updated on the latest changes in the VR eligibility of their members and to remind their members not to vote in the By-e if they had ceased to be eligible for registration as voters subsequent to the publication of the FR of voters. During the process of obtaining the latest membership information from the relevant designated bodies to verify whether the voters in the FR were still eligible for registration, the REO did not identify

any voter being disqualified from voting in the By-e owing to the loss of eligibility for registration.

Publication of the Final Register of Members of the Election Committee

3.10 According to section 40 of the Schedule to the CEEO, the ERO is required to compile and publish a FR of EC members within 7 days after publication of the results of the By-e.

3.11 The results of the By-e held were published in the Gazette on 10 September 2025. Together with ex-officio members and members returned by nominations by designated bodies, the ERO published the FR of EC members on 17 September of the same year for inspection by specified persons.

Section 4 – The Voting Systems

4.1 Apart from ex-officio members and members returned by nomination by designated bodies of the relevant subsectors, the rest of the EC vacancies for the 28 subsectors were elected by eligible individual voters or corporate voters in the relevant subsectors at the By-e. The voting system adopted for the By-e was the “first-past-the-post” system. There were 6 contested subsectors and 22 uncontested subsectors at the By-e.

4.2 The number of seats of EC member returned by election in each of the 6 contested subsectors varied from 1 to 6. A voter might vote for as many candidates as the number of members to be returned at the subsector by-e, and no more. The candidates elected would be the candidate who obtained the highest number of votes followed by the candidate with the second highest number of votes, and so on, until all the vacancies were filled. In the event that there was still one vacancy to fill and the remaining candidates with the highest number of votes had the same number of votes, the RO would have to determine which one of these candidates should be elected to fill the last vacancy by drawing lots. The RO would publicly declare the candidates who were elected at the elections and publish the results of the elections in the Gazette.

4.3 For the 22 uncontested subsectors, the RO had declared, by a notice published in the Gazette on 11 August 2025, that the validly nominated candidates of that 22 subsectors were duly elected.

Section 5 – Before the Polling Day of the Election Committee Subsector By-elections

Candidate Eligibility Review Committee

5.1 According to Annex I to the Basic Law and the CEEO, the CERC is responsible for reviewing and confirming the eligibility of candidates/nominees for EC members of various subsectors.

5.2 The Committee for Safeguarding National Security of the HKSAR determines, on the basis of the result of the review by the National Security Department of the Hong Kong Police Force (“HKPF”), whether a candidate/nominee for EC member of a subsector meets the legal requirements and conditions on upholding the Basic Law and bearing allegiance to the HKSAR of the People’s Republic of China, and issue an opinion to the CERC in respect of candidates/nominees who fail to meet such legal requirements and conditions.

5.3 Under section 9A of the CEEO, the CERC consists of the chairperson, at least 2 but not more than 4 official members and at least 1 but not more than 3 non-official members. Each member of the CERC is to be appointed by the CE by notice published in the Gazette. Only a principal official appointed pursuant to a nomination under Article 48(5) of the Basic Law is eligible for appointment as the chairperson or an official member, and only a person who is not a public officer is eligible for appointment as a non-official member.

5.4 With effect from 19 September 2022, the CERC comprises 7 members, including Mr CHAN Kwok-ki, the Chief Secretary for Administration, as the Chairperson, Mr Erick TSANG Kwok-wai, the Secretary for Constitutional and Mainland Affairs (“SCMA”), Mr TANG Ping-keung, the Secretary for Security, and Miss Alice MAK Mei-kuen, the Secretary for Home

and Youth Affairs, as 3 official members, and Miss Elsie LEUNG Oi-sie, Mrs Rita FAN HSU Lai-tai and Professor Lawrence LAU Juen-yee as 3 non-official members.

Nomination of Candidates

5.5 The nomination period of the By-e commenced on 22 July 2025 and ended on 4 August. A candidate had to be nominated by not less than 5 subscribers (i.e. registered voters of the subsector concerned) other than the candidate himself/herself and was required to submit the nomination form in person to the relevant RO during the nomination period. By the close of the nominations, in relation to the vacancies to be filled by election, the ROs of the 28 subsectors received a total of 101 nomination forms, of which 100 nominations were ruled valid by the CERC, and the remaining 1 nomination (involving the Heung Yee Kuk subsector) was ruled invalid by the CERC because the candidate passed away during the nomination period.

5.6 Of these 100 validly nominated candidates,

- (a) 28 were to contest in 6 subsectors; and
- (b) 72 were returned uncontested in 22 subsectors.

The list of validly nominated candidates for each subsector was published in the Gazette on 11 and 12 August 2025, and the list of duly elected candidates of each uncontested subsector was also published in the Gazette on 11 August. Details of the breakdown of validly nominated candidates are set out in **Appendix V**.

Lots Drawing Session and Briefing Session for Candidates

5.7 Under section 49 of the EAC (EP) (EC) Reg, the ROs conducted lots drawing on 12 August at the Kowloon Park Sports Centre to determine the order in which the names of the candidates of the contested EC subsectors would appear on the ballot papers and to allocate a set of designated spots for the display of election advertisements (“EAs”).

5.8 Besides, the EAC Chairman held a briefing session for the candidates on 18 August at the Queen Elizabeth Stadium, with the attendance of the CEO and representatives from the Department of Justice (“DoJ”), the Independent Commission Against Corruption (“ICAC”) and the Hongkong Post. Major topics covered in the briefing session included an overview of the By-e, details of No Canvassing Zones (“NCZs”) and No Staying Zones (“NSZs”), arrangements for vote counting and announcement of election results, digitalisation of electoral forms, requirements pertaining to election expenses, election donations, election meetings and EAs, deadline and requirements for lodging election returns, and the need to protect the privacy of voters/authorised representatives (“ARs”) with respect to the use of personal data for electioneering purpose. The ICAC representative also gave a briefing on the Elections (Corrupt and Illegal Conduct) Ordinance (Cap. 554) (“ECICO”), while the Hongkong Post representative explained the arrangements and requirements of the free postage service for election mail. The briefing details and the video link were uploaded onto the dedicated election website on 21 August for candidates’ reference and review.

Introduction to Candidates

5.9 In accordance with section 31 of the EAC (EP) (EC) Reg, the poll card, together with the relevant “Introduction to Candidates”, location map of the polling station, guide on voting procedure and an ICAC leaflet, were sent to each

voter/AR no later than 5 days before the polling day by the REO, notifying them of the polling date, polling hours and location of the polling station. The Introduction to Candidates contained the names, personal photographs, relevant personal particulars, candidate numbers and electoral messages of the validly nominated candidates.

5.10 As no poll was to be taken for the 22 uncontested subsectors, the REO issued a notice of uncontested election to the voters of these subsectors, informing them that they were not required to cast their vote(s). Enclosed with the notice was also a copy of the related Introduction to Candidates for voters'/ARs' perusal.

5.11 To assist persons with visual impairment in obtaining the contents of the Introduction to Candidates, the REO encourages candidates to provide the text version of the information included in the Introduction to Candidates, enabling persons with visual impairment to listen to the information with the aid of screen reader software. For the 28 candidates in the 6 contested subsectors, a total of 22 candidates responded to the appeal and provided the relevant information for producing the text version of the Introduction to Candidates and uploading onto the dedicated election website.

Section 6 – Appointments

Appointment of and Briefings for Returning Officers and Assistant Returning Officers

6.1 22 directorate officers from the relevant bureaux and departments were appointed as ROs (as listed at **Appendix VI**) and their appointments were published in the Gazette by the EAC on 4 July 2025. The RO for the Representatives of associations of Hong Kong residents in the Mainland, and the Representatives of Hong Kong members of relevant national organisations subsectors was also designated as the Chief RO responsible for supervising the operation of the CCS.

6.2 Moreover, to provide assistance to the ROs in discharging their duties, the EAC appointed 26 senior officers from the relevant bureaux and departments as Assistant Returning Officers (“AROs”) and 23 qualified legal officers from the DoJ as AROs (Legal) to provide legal advice to the ROs on the polling day and during the count on various matters, especially in determining the validity of questionable ballot papers.

6.3 The EAC Chairman held a briefing session for the ROs and AROs on 8 July at the North Point Community Hall. Other attendees included the CEO and representatives from the DoJ and the ICAC. The EAC Chairman highlighted various major electoral arrangements such as the nomination procedures, appointment of agents, polling arrangements (including the setting up of special queues for voters in need and the use of the electronic poll register (“EPR”) system), requirements relating to the NCZ and NSZ, counting arrangements, provisions in the legislation and the guidelines governing EAs and

election expenses, and handling of complaints. Representative from the ICAC briefed the participants on the major provisions of the ECICO and the procedures for referring the relevant complaints to the ICAC.

6.4 The REO also conducted a briefing session on determining the validity of questionable ballot papers for the ROs and AROs on 28 August at the office of the Immigration Tower, Wan Chai.

Appointment of Nominations Advisory Committees

6.5 The EAC appointed two legal professionals, each constituting a Nominations Advisory Committee (“NAC”) under the Electoral Affairs Commission (Nominations Advisory Committees (Election Committee)) Regulation (Cap. 541H) to, when necessary, provide advice to the ROs on whether a prospective candidate/nominee is eligible to be, or is disqualified from being, nominated as a candidate/nominee. Members of the two NACs were experienced members of the legal profession and not affiliated with any political organisations. Their appointment, covering the period from 22 July to 6 August 2025, was published in the Gazette on 4 July 2025. During the above appointment period, the NACs did not receive any requests for advice.

Section 7 – Preparatory Work

Recruitment of Polling and Counting Staff

7.1 The REO launched a recruitment exercise for the By-e in April 2025 to recruit experienced serving civil servants from various bureaux and departments to perform different electoral duties at polling stations or the CCS. The applicant for the appointment as an electoral staff should have his/her supervisor's consent for temporary release from his/her duties to attend the related training programmes and venue set-up duties at the polling stations or the CCS, etc.

7.2 Those who were appointed as PROs, Deputy Presiding Officers (“DPROs”) and Assistant Presiding Officers (“APROs”) were civil servants at officer rank or above, while other polling staff were civil servants of other ranks. In addition, the REO required appointees to declare whether they had a close relationship with any candidate in order to avoid assigning the staff concerned to work in any of the polling stations or the CCS associated with that candidate. The said arrangement aimed to safeguard the neutrality and independence of the electoral arrangements and uphold the integrity of the election.

7.3 When deploying staff to the polling stations, the REO would take into account the operational needs of individual polling stations and the staff members' experience in previous elections. Also, as far as practicable, the REO assigned the staff to work in the polling stations close to their residential districts.

Training for Polling and Counting Staff

7.4 To familiarise electoral staff with their duties, the REO conducted a series of training for staff working in polling and counting stations respectively. To facilitate the conduct of hands-on training sessions, a floor of the Immigration Tower in Wan Chai was, upon approval from the Government Property Agency, leased to the REO for setting up a temporary training site.

7.5 On 13 August, the REO, in collaboration with the Digital Policy Office (“DPO”), hosted a rehearsal on the technical support for regular and contingency arrangements of the EPR system at the training site.

7.6 From 26 to 28 August, the REO conducted 6 hands-on and scenario-based rehearsals at the training site for all polling staff. Subsequently, from 2 to 4 September, the REO organised on-site rehearsals at the 5 Ordinary Polling Stations (“OPSs”) to familiarise staff with the use of various systems and the workflows, and to conduct various scenario-based rehearsals. During the 2 rounds of rehearsals mentioned above, staff with their assigned OPS teams were arranged to use the actual EPR system to issue ballot papers, practise the activation of the fallback plans in case of contingencies to ensure normal operation of the polling stations during unforeseen situations, and familiarise with the arrangements for delivering ballot boxes to the CCS after the close of poll.

7.7 The REO also organised a general briefing for the polling staff assigned to the Dedicated Polling Station (“DPS”) to explain its operation at the training site on 29 August.

7.8 In addition to the above-mentioned training and hands-on sessions, the REO compiled operational manuals respectively for the PROs, DPROs, APROs, as well as the Polling Officers and Polling Assistants. Staff at DPS were also provided with a supplementary guidance with special points to note. Besides, the REO produced a series of training videos and materials for polling staff, covering preparatory works before the polling day, polling station setup, procedures on polling day, and methods of preparing statistical figures. The operational manuals, training videos and materials were uploaded onto the online training platform to facilitate access and review by polling staff anytime and anywhere.

7.9 As for counting staff at the CCS, the REO organised 2 general briefing sessions and 14 hands-on sessions on counting procedures at the Immigration Tower in Wan Chai from 7 to 19 August. The sessions covered counting procedures, operation of the electronic counting system, (including the counting machines, the Valid Ballot Input System (“VBIS”) and the backup equipment), mock operation rehearsals and contingency arrangements, etc. In addition, to ensure a smooth counting process, the REO arranged 2 on-site counting rehearsals on 4 September and 6 September (i.e. the day before the polling day) for all counting staff at the CCS to strengthen their understanding of their duties. The REO also produced training videos and operational manuals to elucidate the workflow of each functional unit.

7.10 In addition, the REO held a training session at Two Sky Parc in Kwun Tong on 28 August for the electoral staff assigned to the Statistical Information Centre (“SIC”). Relevant operational manuals were provided and scenario-based rehearsals were conducted to cover SIC operations throughout the

polling day and responses to different situations, to ensure the electoral staff concerned were well-acquainted with the SIC procedures. Besides, to further enhance staff's responsiveness, the REO placed particular emphasis on the training under the fallback mode of the EPR system. Through scenario-based rehearsals, electoral staff practised receiving statistics submitted in paper format from various polling stations and completing data consolidation and compilation accordingly.

EAC Visit Programmes on Training

7.11 To ensure the training for the electoral staff were conducted in an orderly manner and to demonstrate support to them, the EAC paid a visit to the technical support rehearsal for the EPR system held at the Immigration Tower in Wan Chai on 13 August. Subsequently, on 15 August, the EAC observed a training session for counting staff at the same venue. The session included the use of the relevant systems to swiftly input vote counts for each candidate under the fallback counting arrangements, so as to ensure accuracy and efficiency in the counting process. The EAC also visited a hands-on training session for the polling staff held at the same venue on 28 August to observe the arrangements for staff to activate corresponding fallback plans. The EAC was satisfied with the training arrangements after the visit.

Polling Stations and Counting Station

7.12 The REO identified 5 venues as polling stations for the By-e, serving approximately 3 600 voters from the 6 contested subsectors to cast their votes. Key factors in selecting polling station venues included their accessibility, convenience for voters with mobility difficulties or using

wheelchairs, etc. The 5 OPSs were located at the Exhibition Gallery in Hong Kong Central Library, Kowloon Park Sports Centre, Tiu Keng Leng Sports Centre, Wai Tsuen Sports Centre and Che Kung Temple Sports Centre. In addition, 1 DPS was set up in the Happy Valley Police Station for voting by voters in custody or on remand on the polling day. Around 500 to 900 voters were assigned to each OPS.

7.13 Under the combined voting arrangement, a voter of a subsector who was also an AR of a corporate voter of another subsector might cast votes for both subsectors at the same polling station.

7.14 A CCS, including the media centre (“MC”), was set up at the Hong Kong Convention and Exhibition Centre (“HKCEC”), occupying Hall 3B, the Grand Hall and the Grand Foyer on Level 3 and the Chancellor Room on Level 4, with a total area of approximately 10 300 m².

7.15 In accordance with section 28 of the EAC (EP) (EC) Reg, the CEO published by a notice in the Gazette the designation of all polling stations and the counting station on 15 August 2025.

Polling Arrangements

7.16 During the on-site rehearsals held between 2 and 4 September, as well as on the set-up day, the day before the polling day, polling staff set up the designated venues as polling stations, with each polling station equipped with ballot paper issuing desks, voting compartments, ballot paper checking machines and ballot boxes, etc.

7.17 Outside each polling station, there were areas designated by the RO as NCZs and NSZs to provide voters with a hindrance-free access to the polling station. Related notices were also put up at prominent spots at or near the polling stations to notify members of the public of the delineation of the NCZs and NSZs.

7.18 Each ballot paper issuing desk at a polling station was provided with complete booklets of ballot papers in respect of each individual subsector for issue to eligible voters of the By-e. Except for the DPS, the EPR system was used in the five OPSs of the By-e. The polling staff would confirm the identity of the voter through the EPR system when they presented their identity document. Upon verification, polling staff would make record and then issue a ballot paper. Each ballot paper clearly bore the name of the relevant subsector at the upper-right corner and was printed in a colour assigned to that subsector for identification. The voter was required to mark the ballot paper by filling the ovals opposite the name(s) of the candidate(s) of his/her choice with the black pen provided at the polling stations.

7.19 Ballot paper checking machines were also set up at the polling stations for voters/ARs to check whether the ballot paper had been marked according to the electoral legislations. The ballot paper checking machines would not record or count the choice(s) marked on the ballot paper. Having checked the ballot paper, voters/ARs could insert the unfolded ballot paper into the ballot box with the marked side facing down.

7.20 Apart from overseeing the nomination and related matters for the assigned subsector, some ROs were also responsible for overseeing the operation of 1 to 2 polling stations on the polling day. The PRO, assisted by the DPROs and APROs, was responsible for ensuring the smooth and efficient operation of

the polling station under his/her charge during the poll and had to work closely with the RO concerned.

Special Queuing Arrangement

7.21 In accordance with section 49A of the EAC (EP) (EC) Reg, the PRO may make special queuing arrangements for voters in need, including persons aged 70 or above, pregnant women and persons who are not able to queue for a long time or have difficulty in queuing because of illness, injury, disability or dependence on mobility aids. The PRO would set up two queues at the polling station, one for voters in need and another for other voters. The PRO should also flexibly deploy ballot paper issuing desks with a view to reducing the overall waiting time.

Polling Hours

7.22 The poll started at 9:00 a.m. and ended at 6:00 p.m. for all polling stations.

Special Polling Arrangements for Imprisoned, Remanded and Detained Voters

7.23 To enable voters, if any, who were imprisoned or remanded by the Correctional Services Department (“CSD”) to vote on the polling day, DPSs would be set up by the REO in the penal institutions of the CSD. As there was no such voter in contested subsectors, no DPS was activated in CSD penal institution. Besides, as there might be voters arrested by law enforcement agencies (“LEAs”) any time on the polling day, the REO set up a DPS at the Happy Valley Police Station in case there would be voters held in custody by

LEAs other than the CSD to cast their votes on the polling day. The polling hours of the DPS set up at the police station were the same as those of the OPSs. The venue setup of a DPS was basically the same as that of an OPS, except that some of the polling materials were specially designed for security reasons.

The Fast Response Team

7.24 According to the established practice, the REO has set up two FRTs for the By-e. Apart from inspecting the operation of the polling stations and advising PROs where necessary, they also rendered immediate advice and assistance to ROs and PROs with regard to electoral arrangements. The FRTs had to report to the Central Command Centre (“CCC”) on any major irregularities and problems observed, and execute the CCC’s response instructions.

Counting Arrangements

7.25 As the number of seats in each contested subsector of the By-e varied (ranging from 1 to 6) and the numbers of candidates in certain subsector may be relatively large (ranging from 2 to 8), the REO commissioned a contractor to develop the Ballot Paper Classification and Validation System (“BPCVS”) to count the votes automatically with the aid of the counting machines. To facilitate the operation of the system, the design of the ballot papers must conform to specific requirements. Voters were required to fill the ovals on the ballot paper with the black pen provided at the polling stations. Besides, to ensure the reliability and integrity of the BPCVS, the REO had engaged an independent contractor to provide four types of quality assurance services including privacy impact assessment service; information technology security risk assessment and audit service; independent testing service and computer audit service to evaluate

potential privacy issues; review information technology security risks, reliability and stability of the system. The computer audit service contractor was also responsible for monitoring the use of the BPCVS during the whole counting process.

7.26 After the close of poll, all ballot papers cast at the polling stations were delivered to the CCS at the HKCEC for counting. In the CCS, there were Ballot Box Reception Area for receipt of ballot boxes and electoral documents delivered from various polling stations; Ballot Paper Processing Zone for opening ballot boxes and visual screening of ballot papers; Ballot Paper Scanning Zone for automated vote counting by counting machines; Valid Ballot Input Zone for manual input of votes on valid ballot papers; and Questionable Ballot Paper Determination Zone for the ROs to determine the validity of questionable ballot papers and announce the counting and election results.

7.27 The counting process began with the opening of ballot boxes and visual screening of ballot papers. Upon opening the ballot boxes, staff would briefly screen the ballot. Clearly invalid and questionable ballot papers would be separated and referred to the RO for adjudication at the Questionable Ballot Paper Determination Zone. The remaining ballot papers would be delivered to the Ballot Paper Scanning Zone for automated counting by the counting machines. When the ballot papers were scanned by the counting machines, the system would instantly read and record the choices marked on the valid ballot papers. As for the ballot papers identified as invalid or questionable during scanning, they would be referred to the ROs of the respective subsectors for adjudication at the Questionable Ballot Paper Determination Zone. Questionable ballot papers ruled as valid would be transferred to the Valid Ballot Input Zone where the

counting staff would input the votes recorded on the ballot papers manually into the BPCVS. Upon completion of the counting work of all subsectors, the counting staff of the Counting Zone Command Centre would consolidate the counting results through the BPCVS.

7.28 As the count involved multiple steps and the ballot papers were processed by counting staff in different functional units, staff were required to transport the ballot papers using transparent plastic boxes to prevent loss or damage during transit. In addition, counting staff would also fill in or print out forms to record information of the ballot papers they handled, such as the types and numbers of clearly invalid ballot papers at the Questionable Ballot Paper Determination Zone, the number of ballot papers processed by individual counting machine in each scan and the corresponding scanning results at the Ballot Paper Scanning Zone, etc. At the same time, counting staff would publish the counting progress of each subsector through the Counting Information Display System to facilitate public monitoring of the counting process.

7.29 Apart from the counting zone, the MC set up at the Grand Hall and the Grand Foyer on Level 3 of the HKCEC also provided an area for candidates, their election/counting agents and members of the public to observe the declaration of election results, as well as a press area for the media to cover the election news. In addition, a public area was set up in the counting zone at Hall 3B on Level 3 for members of the public to observe the count. As in previous elections, candidates and their election/counting agents were permitted to observe the count within the designated area of the counting zone.

Compilation of Voter Turnout Statistics

7.30 On the polling day, the EPR system would automatically collect the hourly voter turnouts of polling stations and transmit them to the Electronic Voter Turnout Compilation System at the SIC for compiling the cumulative hourly voter turnouts across all polling stations and publishing the hourly voter turnouts and voter turnout rates through the dedicated election website.

Various Contingency Measures

7.31 The following arrangements and contingency plans were made by the REO to cater for inclement weather or emergencies:

Implemented Arrangements

- (a) designation of 5 venues as reserve polling stations and 1 venue as reserve DPS to replace the originally assigned polling stations in the event that the original polling stations, for one reason or another, could no longer function properly or be accessed;
- (b) set-up of 3 emergency depots to provide logistic support to the respective polling stations in each district;
- (c) set-up of a fall-back CCS at the Yuen Chau Kok Sports Centre and a fall-back MC at the Yuen Chau Kok Community Hall. In case the HKCEC was rendered inoperable by unexpected events, the central counting process and the operation of the MC would be relocated to the fall-back venues;

- (d) reservation of vehicles for delivering ballot boxes and transporting counting staff to the fall-back venues when necessary; and
- (e) preparation of public announcement notices in the event that any of the contingency arrangements as set out above had to be implemented;

Contingency Plans

- (a) delay or postponement of voting at one or more polling stations or the counting of votes at the CCS, if necessary;
- (b) extension of voting hours to address flooding, power outages, or other emergencies, if necessary;
- (c) switching to using the printed-form FR for issuing ballot papers in the event of a failure of the EPR system, and providing relevant training for polling staff;
- (d) switching to manual counting in the event of a total failure of both the counting machines and the backup counting machines in the counting system, and providing relevant training for counting staff; and
- (e) preparation of public announcement notices in the event that any of the contingency arrangements as set out above had to be implemented.

Section 8 – Publicity

8.1 From 4 July to the polling day on 7 September 2025, the REO carried out a wide range of publicity initiatives, including broadcasting the Announcements of Public Interest on television, radio channels and the Internet; placing advertisements online; displaying posters at MTR stations and bus stops; placing advertisements on buses and trams; hanging large banners at outdoor or prominent locations; issuing press releases; and launching a dedicated election website, etc. to inform the voters of the By-e arrangements and encourage voter turnout. The ICAC outlined the key provisions of the ECICO to the candidates by distributing information booklets and leaflets, and placed advertisements on newspapers and online platforms to promote clean elections.

8.2 To further enhance public awareness and understanding of the elections, the Constitutional and Mainland Affairs Bureau (“CMAB”) and the REO jointly organised the “HKSAR Elections Interactive Exhibition”, which took place at the Central Market from 21 to 24 July. The Chief Secretary for Administration, the SCMA, and the EAC Chairman visited the exhibition on 22 July to try out interactive games, have exchanges with on-site staff and members of the public, and encourage eligible individuals to actively participate in the By-e and the 2025 LCGE.

8.3 Detailed information about the By-e, including the electoral legislations, the Guidelines and its Supplementary Information, press releases, Introduction to Candidates, Guidelines for Candidates, voter turnout, election results, relevant information of the polling stations and the CCS (including the MC) and publicity materials were uploaded onto the dedicated election website to facilitate public perusal.

8.4 As in the past, the REO translated the ECSS By-e brief and the voting procedures in ten languages¹ other than Chinese and English. The translations were available on the dedicated election website and the Race Relations Unit webpage of the Home Affairs Department (“HAD”), and were also displayed at selected support centres for ethnic minorities.

¹ Including Japanese, Korean, Bahasa Indonesia, Hindi, Nepali, Punjabi, Tagalog, Thai, Urdu and Vietnamese.

Section 9 – Polling Day

The Central Command Centre

9.1 On the polling day, the REO set up the CCC at the HKCEC, which commenced operation from 5:00 a.m. and ceased operation after the candidates and voters had left the polling stations, the counting zone and the MC. Apart from the EAC, the CCC was staffed by representatives from the following parties: CMAB, Security Bureau (“SB”), REO, DPO, HKPF, ICAC, Fire Services Department (“FSD”) and Information Services Department (“ISD”). Relevant units from the REO and various government bureaux/departments operated in the CCC to facilitate communication and co-ordination, enabling swift response to different election-related matters on the polling day.

9.2 The CCC comprised a Command Desk and 16 Helpdesks:

- (a) the Command Desk was tasked with overseeing the overall conduct of the poll, and giving directives to the electoral staff who encountered unexpected incidents or problems; and
- (b) the Helpdesks were tasked to handle enquiries about electoral matters raised by the polling staff.

9.3 The CCC was equipped with an Incident Logging System to facilitate information sharing and event follow-up among relevant parties, and featured an Election Information Communication System to maintain communication with polling stations.

9.4 At the district level, District Liaison Officers from the respective District Offices were responsible for coordinating communication among individual polling stations, the respective ROs and the CCC. HAD staff were also appointed as electoral staff to station at the District Offices to arrange for the

removal of unauthorised EAs and handle other election-related complaints.

9.5 In addition, the REO set up designated working areas for the EAC, CMAB, ROs, DoJ, ISD, HKPF, FSD and Auxiliary Medical Service (“AMS”) at the counting zone and the MC inside the CCS at the HKCEC to facilitate them to discharge their duties on the polling day.

9.6 The HKPF and the Civil Aid Service (“CAS”) assisted in maintaining order in the OPSs (including relevant NCZs and NSZs). Police officers also stationed at the DPS set up in the police station to provide support to the PRO.

Statistical Information Centre

9.7 The REO also set up an SIC at the HKCEC for collecting and consolidating various electoral statistics from polling stations (including voter turnout, complaint figures, etc), and disseminating important information to all polling stations and relevant departments. The consolidated voter turnout and voter turnout rate were made available to the public on an hourly basis through government press release and the dedicated election website. The SIC was also responsible for checking and disseminating counting results collected from the CCS. In general, the SIC operated smoothly on the polling day.

Crisis Management Committee

9.8 As in the past, the REO set up a Crisis Management Committee (“CMC”) for the By-e and formulated a detailed contingency plan to address any incidents that could obstruct, disrupt, undermine or seriously affect the By-e. In the event of a serious incident, such as severe weather, riot, public violence, threats to public health or safety, or occurrences of material irregularity relating to the By-e, the poll or the count in the EAC’s view, that might warrant

postponement of the election, voting, or counting, the CMC should provide the EAC with expert advice. Chaired by the EAC Chairman, the CMC comprised EAC Members, representatives from the CMAB, REO, SB, HAD, DoJ, ISD, HKPF, DPO, Transport Department (“TD”) and Hong Kong Observatory (“HKO”). Representatives of other relevant government bureaux/departments might also be invited to attend the CMC meetings when necessary.

9.9 The CMC convened a meeting at the Central Government Offices in the afternoon of 26 August. The CMC was briefed by various government bureaux and departments on their assessments on different situations, election-related preparations and co-ordination work, and the polling day arrangements so as to ensure smooth conduct of the By-e. In response to the weather conditions, the CMC also held a meeting at HKCEC in the afternoon of 7 September 2025 to closely monitor the conduct of the election and provide expert advice to the EAC. During the meeting, the HKO reported that it would issue the No. 8 Gale or Storm Signal between 9:00 p.m. and midnight on the polling day, while the TD provided a brief on the special traffic and transport arrangements under typhoon condition. After due consideration, the EAC issued a press release in the evening of the polling day, announcing that the poll of the By-e would continue as scheduled until 6:00 p.m. and the count would proceed as scheduled.

The Complaints Centre

9.10 A Complaints Centre was set up at the REO office in the Treasury Building to handle election-related complaints.

9.11 Complainants could lodge complaints by telephone, fax, email or by submitting duly completed complaint forms. The Complaints Centre was manned by staff of the EAC Secretariat and operated during the polling hours. Details of the work of the Complaints Centre and the complaints received on the polling day and during the complaints-handling period are set out in **Section 11**.

Election Hotline Enquiry Centre

9.12 The Election Hotline Enquiry Centre was set up at the REO office at the Standard Chartered Tower in the Millennium City 1 in Kwun Tong to handle election-related enquiries. On the polling day, five enquiry hotlines were deployed to handle enquiries from members of the public, ethnic minorities, LEAs and polling staff regarding VR as well as the electoral and polling arrangements and provide assistance to visually-impaired voters in apprehending the content of the Introduction to Candidates.

Number of Voters

9.13 A total of 3 534 voters cast their votes, accounting for 97.33% of the 3 631 registered voters of the contested subsectors. A breakdown of the turnout rate by subsector is shown at **Appendix VII**.

Exit Poll

9.14 No applications for conducting exit poll were received in the By-e.

Section 10 – The Count

10.1 The counting of votes for the By-e was conducted at the CCS located at the HKCEC. An RO was designated as the Chief RO to supervise the overall operation of the CCS.

10.2 After the close of poll at 6:00 p.m., one DPRO or APRO from each OPS delivered the ballot box and ballot paper account to the CCS under police escort. Then, the PRO immediately prepared and packed other electoral documents for separate delivery to the CCS². The first ballot box was opened by the Chief RO at the CCS at 6:21 p.m. on 7 September, and was emptied by the EAC Chairman and Members, and the SCMA. According to the established procedures, counting staff first inspected the ballot papers and visually screened out those that could not be scanned by the counting machines. Then, the scannable ballot papers would be counted in batches by the counting machines. The ROs should determine questionable ballot papers in the presence of the candidates/agents, and the votes recorded on ballot papers that were ruled valid by the ROs would be entered manually into the counting system by the staff.

10.3 The By-e recorded a voter turnout of 3 534 while a total of 3 535 ballot papers were handled at the CCS. Upon comparison, the counting staff discovered that the number of counted ballot papers of the Technology and innovation subsector exceeded the subsector's voter turnout by 1. A similar situation also occurred in the Representatives of members of Area Committees, District Fight Crime Committees, and District Fire Safety Committees of the New Territories subsector, i.e. the number of counted ballot papers exceeded the subsector's voter turnout by 1. Conversely, the number of counted ballot papers of the Labour subsector was 1 less than the subsector's voter turnout. As such,

² The arrangement was only applicable to the OPSs. For DPS, the ballot box, ballot paper account and other electoral documents were delivered together to the CCS after the close of poll.

after offsetting, the CCS handled a total of 3 535 ballot papers in that evening, which exceeded the total voter turnout by 1.

10.4 After the count at the CCS that evening, the REO discovered that all the above discrepancies originated from the same polling station. Based on past experience, differences between voter turnout and the final number of counted ballot papers occasionally occurred in past elections, possibly due to the mistaken issuance of a ballot paper for another subsector or the inadvertent issuance of an extra ballot paper by the polling staff at the ballot paper issuing desks in polling hours, or there might be voters who, after taking the ballot paper, did not put it into the ballot box. During the count, after comparing the number of votes obtained by the lowest-vote-winning candidate and that of the highest-vote-losing candidate in the above 3 subsectors³, it was considered that the discrepancies had no impact on the election results in these 3 subsectors. Therefore, after seeking legal advice, the RO declared the relevant candidates elected. Nonetheless, to adhere to the principle of fairness in all elections, the REO, upon the EAC's directive, has also referred the aforementioned cases to the relevant LEA for investigation and follow-up. The cases concerned are still under investigation.

10.5 Of the 3 535 ballot papers counted at the CCS, 2 were clearly invalid, including 1 that was unmarked and 1 with the number of candidates marked exceeding the number of EC members to be returned at the subsector by-e concerned. Pursuant to sections 74A(b), 77(1)(f) and (ga)(ii) of the EAC (EP) (EC) Reg, the 2 ballot papers were not counted. Besides, 46 ballot papers were identified as questionable by the ROs. With the assistance of the AROs (Legal), the ROs of the respective subsectors examined the questionable ballot papers to determine their validity one by one in the presence of the candidates and

³ The election results and the number of votes obtained by each candidate in all contested subsectors are listed in **Appendix IX**.

their agents. In the end, 18 questionable ballot papers were ruled invalid by the ROs and were not counted, including 11 ballot papers with writing or a mark by which the voter could possibly be identified, 1 with uncertain choice and 6 not marked in the manner as stipulated in section 56(1) of the EAC (EP) (EC) Reg⁴. The remaining 28 questionable ballot papers were ruled valid and the votes recorded thereon were manually entered into the counting system. An analysis of the ballot papers not counted is shown at **Appendix VIII**.

10.6 From the opening of the first ballot box up to the announcement of all election results, the entire counting process took about 2 hours and 14 minutes.

Election Results

10.7 The counting of votes for individual subsectors completed sequentially. The election result for the first subsector (i.e. the Representatives of members of Area Committees, District Fight Crime Committees, and District Fire Safety Committees of Hong Kong and Kowloon subsector) was announced at 8:25 p.m. on 7 September while that for the last subsector (i.e. the Technology and innovation subsector) was announced at 8:35 p.m. on the same day. All election results were uploaded onto the dedicated election website shortly after the announcements, and were published in the Gazette on 10 September, which are now reproduced at **Appendix IX** for easy reference.

EAC Visits

10.8 On the polling day, the EAC Chairman and the two Members respectively visited the polling stations in different districts and proceeded to the CCC to closely monitor the progress and situation of the poll. Moreover, they

⁴ In accordance with section 56(1) of the EAC (EP) (EC) Reg, a voter voting at a subsector election must mark the ballot paper by filling in black the oval(s) on it opposite the name(s) of the candidate(s) of his or her choice.

met the media together at the MC at the HKCEC at around 11:15 a.m. to share electoral statistics and respond to media questions.

10.9 After the close of poll, the EAC Chairman and the two Members monitored the opening of the first ballot box at the CCS and emptied it with the SCMA. The EAC subsequently met the media to provide the overall voter turnout and answer questions from the media. After the completion of all counting process, the EAC held a final meet-up with the press to conclude the elections. The EAC affirmed that the By-e were held and completed in an open, honest and fair manner.

Section 11 – Complaints

11.1 The complaints-handling mechanism is one of the measures adopted by the EAC to safeguard the fairness and integrity of the electoral system. Besides, complaints can also reveal deficiencies in certain aspects of the electoral arrangements and help the EAC make better arrangements in future elections.

11.2 The complaints-handling mechanism also facilitates mutual monitoring among candidates, enabling them to better understand the requirements of the electoral legislations and the guidelines on election-related activities. The EAC is committed to handling complaints received fairly and efficiently.

11.3 The complaints-handling period for the By-e started on 22 July 2025 (i.e. the day when the nomination period commenced) and ended on 22 October (i.e. 45 days after the polling day). Altogether 5 parties were responsible for handling complaints during the complaints-handling period, including the EAC, ROs, HKPF, ICAC and PROs (who discharged their duties on the polling day only). Each of these parties had their respective areas of responsibilities subject to the nature of complaints:

- (a) the EAC was responsible for handling complaint cases not covered by any statutory provisions involving criminal liability;
- (b) the ROs were delegated by the EAC to handle complaints of a minor nature, such as those relating to the display of EAs, disputes over electioneering activities, improper use of sound amplifying devices causing annoyance to nearby residents and persons with visual impairment, etc.;

- (c) the HKPF was responsible for handling cases involving possible criminal offences, e.g. breaches of the EAC (EP) (EC) Reg and criminal damage of EAs, etc.;
- (d) the ICAC handled cases involving possible breaches of the ECICO, the Prevention of Bribery Ordinance (Cap. 201) and the ICAC Ordinance (Cap. 204); and
- (e) the PROs handled complaints received at the polling stations on the polling day and took action on those cases that required immediate attention, e.g. unlawful activities occurred in the polling stations, etc.

Complainants could lodge their complaints with any of the parties above, and cases would be referred to the relevant party for handling.

11.4 During the complaints-handling period, the EAC Secretariat undertook the role of a coordinator, responsible for collating complaint-related statistical information from other parties and submitting consolidated reports on complaint statistics to the EAC regularly.

11.5 Additionally, staff of the EAC Secretariat operated the EAC Complaints Centre on the polling day, while ROs were responsible for receiving and handling complaints at their offices, and PROs were responsible for receiving complaints at the polling stations and handling the complaints on the spot as far as possible. Moreover, designated police officers were on duty in the police stations within each district to attend to complaints, while designated ICAC officers also answered incoming calls to the complaint hotline on the polling day.

11.6 The complaints-handling period of the By-e ended on 22 October 2025. A total of 4 complaints were directly received by the aforementioned 5 parties. Details are as follows:

Complaints-handling Party	No. of Complaints Directly Received
EAC	3 cases
ROs	0 cases
HKPF	0 cases
ICAC	0 cases
PROs	1 case
Total:	4 cases

11.7 The 4 complaints were related to EAs, allocation/designation of polling station, polling arrangements and against polling staff respectively. A breakdown of the complaints received by each party during the complaints-handling period and nature is shown at **Appendix X**. All investigations to the complaint cases had been completed and a breakdown of the outcome of investigations is shown at **Appendix XI**.

Section 12 – Review and Recommendations

12.1 The EAC considers that the By-e were smoothly conducted in an open, honest and fair manner, and is satisfied with the overall electoral arrangements. In line with the established practice, the EAC has reviewed the electoral procedures and arrangements of the By-e, with a view to further improving the electoral arrangements for future elections. The EAC’s review findings and recommendations are set out in the ensuing paragraphs.

Training for Electoral Staff

Providing Electoral Staff with Trainings, Rehearsals and Hands-on Sessions

(i) On-site Rehearsals

12.2 The five OPSs of the By-e were all set up at venues under the Leisure and Cultural Services Department (“LCSD”). Thanks to the LCSD’s arrangement to make the venues available earlier, the REO organised on-site rehearsals at the OPSs for the first time by arranging all staff of the same polling station to set up the venues in advance within one week preceding the polling day, and conducting mock rehearsals covering the entire polling process, including the procedural operation of issuing ballot papers by the EPR system, various tasks after the close of poll, and procedures for activating the fallback mode under contingencies. During the rehearsals, REO staff could provide the polling staff with instant guidance and assistance in familiarising with different operational workflows of the polling stations. The PROs might also make appropriate manpower deployment in advance having regard to the actual rehearsal situation, so as to ensure smoother operation of the polling stations.

12.3 **Recommendation:** The EAC considers that on-site rehearsals could substantially enhance the effectiveness of training; early set-up of the

polling stations could also help polling staff concentrate more on the rehearsals, which were conducted on the day before the polling day, so that they could get better prepared for the work on the polling day. The EAC suggests the REO continue to make appropriate arrangements for the polling staff to conduct on-site rehearsals and to set up the polling stations early in the future, subject to the availability of venues and manpower.

(ii) *Enhancement of Training*

12.4 The REO has enhanced the overall training arrangements for the By-e. Aside from continuing to deliver online classes to cover theoretical training, there were also face-to-face sessions focusing on hands-on training and scenario-based rehearsal, allowing electoral staff to have sufficient opportunities to deepen their knowledge and grasp of the operation of the polling stations, counting station and relevant systems through rehearsals. The training focused on, among other things, the use of the EPR system to issue ballot papers and the fallback plans for the relevant contingency arrangements, which greatly enhanced the staff's capability in tackling unexpected incidents.

12.5 In respect of the counting work, the REO has enhanced the corresponding training, including—

- (a) Organisation of 2 briefing sessions, 14 hands-on trainings, 1 on-site mock counting rehearsal and 1 in-depth briefing cum on-site rehearsal. The number of training sessions for each counting staff member increased from 2 sessions in the 2021 Election Committee Subsector Ordinary Elections (“2021 ECSSOE”) to 5 sessions this year; and
- (b) Addition of an on-site mock counting rehearsal covering the entire counting process, provision of pre-marked mock ballot

papers, which quantity was comparable to the total number of voters, for all counting staff to conduct mock counts, and arrangement of scenario-based rehearsals (e.g. handling paper jams, activating fallback systems, etc.).

12.6 In addition to the aforesaid arrangements, the REO also continued to provide counting staff with operational manuals, and compile “reminder notes” for counting staff in different functional units. Moreover, training videos were uploaded onto the training platform to facilitate counting staff in reviewing the counting workflow and the details of each arrangement anytime and anywhere.

12.7 **Recommendation:** The EAC considers that the smooth and highly efficient completion of the By-e has again demonstrated the importance of providing electoral staff with sufficient training and rehearsals. In concluding the training arrangements, the EAC is satisfied with the REO’s efforts in providing diversified types of training and arranging more focusing on-site rehearsals, and increasing the electoral staff’s total in-post training hours so as to allow them to have a better understanding and grasp of their duties.

12.8 The EAC recommends that the REO should continue to provide sufficient and effective trainings and rehearsals for electoral staff in future elections. Besides, the EAC expresses its gratitude to all relevant heads of government bureaux/departments for their support and approval of the temporary release of electoral staff from their original posts to attend trainings and rehearsals arranged by the REO. The EAC hopes that the government bureaux/departments would continue to support the related arrangements, granting electoral staff temporary release from their original posts to actively participate in the trainings and rehearsals in future elections.

Polling Arrangements

Ballot Paper Checking Machine

12.9 The REO set up 4 to 5 ballot paper checking machines at each of the 5 OPSs for voters to use. The machines could assist voters in checking whether their ballot papers had been properly marked in accordance with the relevant electoral legislations without recording or counting the voters' choices. The EAC notes that most of the voters used the machines to check the ballot papers.

12.10 **Recommendation:** The EAC opines that the ballot paper checking machines ran smoothly in the By-e and served its intended purpose by effectively aiding voters to check whether the ballot papers had been properly marked according to the relevant electoral legislations. The EAC suggests the REO proactively consider provision of and encourage voters to use such checking machines in future elections as appropriate, with a view to reducing the number of questionable ballot papers from the source and enhancing the counting efficiency.

Increase the Number of Ballot Paper Issuing Desks/ Shorten the Queuing Time for Voting

12.11 After consolidating the actual experience from the 2021 ECSSOE where a large proportion of voters cast their votes on the morning of the polling day, the REO in the By-e set up a total of 56 ballot paper issuing desks in the 5 OPSs, representing an increase of 180% comparing with the 20 ballot paper issuing desks in the 2021 ECSSOE. This arrangement effectively enabled all polling stations to operate smoothly on the polling day even during voter flow peaks. Voters were able to complete the voting procedures in an expeditious manner.

12.12 **Recommendation:** The EAC sees positive results in increasing the number of ballot paper issuing desks. The REO may, based on the actual circumstances, consider continuing to set up a suitable number of ballot paper issuing desks as necessary in future elections.

Counting Arrangement

New Arrangement on the Delivery of Ballot Boxes to Counting Station

12.13 The 2025 Ordinance took effect upon its gazettal on 2 May 2025. It has enhanced the electoral arrangements, such as revising the previous practice of preparing a separate ballot paper account for each subsector to only preparing a consolidated ballot paper account for each polling station. To be in line with such revision, the REO has simplified the ballot paper account by reducing the details required. The above enhancement measures significantly simplified the procedure and shortened the time required for preparing the ballot paper accounts, thereby elevating the performance of the CCS in verifying the ballot paper accounts and allowing expeditious delivery of ballot boxes and early commencement of the counting process.

12.14 Besides, the 2025 Ordinance also introduced an amendment that allows the PROs to have a flexible arrangement in the delivery of ballot boxes, ballot paper accounts and sealed packets (including the un-issued ballot papers, the unused ballot papers, the spoilt ballot papers, and the printed copy of the subsector final register, if marked) after the close of poll for the elections. Deliveries of ballot boxes and ballot paper accounts from the polling stations to the CCS were prioritised in the By-e, so that the counting process could commence as early as possible, while the sealed packets were separately delivered to the CCS afterwards.

12.15 **Recommendation:** The EAC notes that after the implementation of the new arrangements in the By-e, it took only 5 to 8 minutes for the 5 OPSs to complete the ballot paper accounts and seal the ballot boxes before delivering them to the CCS. Besides, the ballot boxes and ballot paper accounts from the 5 OPSs arrived sequentially at the CCS within 18 to 28 minutes after the close of poll, while all sealed packets arrived at the CCS subsequently before 8:00 p.m., which was much faster than that in the 2021 ECSSOE (The 5 OPSs took around 1 hour 25 minutes to nearly 3 hours to seal the ballot boxes and prepare the ballot paper accounts and the sealed packets before delivering them to the CCS, which arrived between 1 hour 40 minutes and 3.5 hours after the close of poll). The EAC opines the new arrangements have effectively improved the counting efficiency substantially and thus suggests the continued adoption of the refined arrangements in future elections.

Electronic Counting

12.16 To further enhance the counting process, the REO has developed a new electronic counting system for the By-e, which functions and advantages included:

- (a) Use of the newly developed counting machines, which could identify the subsectors of the respective ballot papers more efficiently and accurately, and count the votes for each candidate on the valid ballot papers. The implementation of the new counting system had significantly reduced the time required for sorting the ballot papers by subsector manually in advance. Besides, the scanning speed of the counting machines was also faster than that of the counting machines used in the past; and
- (b) Use of the newly developed VBIS to manually input questionable ballot papers determined as valid by the ROs via the touch screen.

The VBIS supported simultaneous operation by two staff to enhance the inputting speed, and checked the data consistency by comparing the entries input by the two staff.

12.17 **Recommendation:** The EAC is satisfied with the new electronic counting system used in the By-e, which enabled the counting process to be completed smoothly and efficiently. The entire counting process⁵ took approximately 2 hours and 14 minutes. The REO should continue using the electronic counting system in future elections, and review possible room for improvement in other areas, so as to streamline the counting workflow.

Determination of Questionable Ballot Papers

12.18 Having learnt from the operational experience of the 2021 ECSSOE and based on the EAC's recommendation, the REO set up a questionable ballot paper determination table for each contested subsector in the By-e. The ROs no longer needed to wait in line for the use of the questionable ballot paper determination table for adjudication of questionable ballot papers and announcement of the counting and election results.

12.19 **Recommendation:** The EAC opines that consideration should be given to arranging dedicated questionable ballot paper determination tables for contested subsectors, especially the ones with larger number of ballot papers in future elections if the conditions of the venues permit, so that the ROs can determine the validity of the questionable ballot papers and announce the counting and election results in a more expeditious manner.

⁵ From the opening of the first ballot box up to the announcement of all election results.

System Support

Enhance the Resilience of the EPR system and the Contingency Arrangements

12.20 The 5 OPSs in the By-e followed the practice of using the EPR system for issuing ballot papers, and the operation was smooth in general. In response to the series of recommendations regarding the incident on the EPR system made by the EAC in the Report on the 2023 District Council Ordinary Election, the REO has implemented various improvement measures, including enhancing the protection for project implementation, conducting comprehensive tests, audits and drills, building a proactive system monitoring mechanism, as well as formulating immediate solutions.

12.21 To enhance the protection for project implementation, the REO has, as recommended in the said Report, established a three-tier confirmation mechanism for strengthening security arrangements. The first tier was to establish the Mission Critical System Development and Maintenance Board (“the Board”) in 2024, comprising the management, the technical team and the relevant internal divisions of the REO, as well as technical experts from the DPO. The Board examines in detail the results of various tests and audits dedicated to the core election systems, and assesses any system alterations proposed, including their necessity and feasibility, as well as the potential impact and risks that the alterations may have on the systems and the overall election operation. The second tier involves comprehensive protection on personal data privacy as well as thorough tests, assessments and audits on the system security, conducted by the independent contractor appointed by the REO. A third-party contractor appointed by the DPO also acts as the red team to conduct load/stress tests to ensure the security and stability of the systems under highly stressful conditions of processing large volume of electors. The third tier is the Technical Advisory Committee (“TAC”), comprising experts from the academia and the industry as well as representatives from the DPO. The TAC is responsible for conducting a

final review on the system alterations and the results of the tests, evaluations and audits to ensure that the security and stability of the systems are sufficiently protected.

12.22 Besides, with reference to the results of the tests conducted during voter flow peaks, the REO has developed a series of key monitoring indicators for proactive system monitoring, and conducted a comprehensive contingency test by simulating the performance of the system components under different scenarios of system failure, with corresponding immediate solutions formulated. To strengthen technical support and contingency plans for the EPR system, the REO adopted the principle of “instant response, rapid recovery” and combined multi-layered system monitoring with a comprehensive contingency plan. The corresponding contingency plans would be immediately activated when the system monitoring indicators exceeded their pre-defined thresholds, with an aim to resume system operations within the shortest period of time. In the event that the system contingency plan failed to resolve a major system incident, a backup manual ballot papers issuance plan would be immediately activated as the final contingency measure, with the aim to minimise the impact of the system failure on the electoral process and ensure smooth issuance of ballot papers. In view of the new arrangements on proactively monitoring of the system operation, the REO formed a Central Systems Monitoring and Response Unit (“CSMR Unit”) which was led by the Commissioner for Digital Policy (“CDP”), and consisted of the department’s technical team, the DPO’s core technical team and the system contractors. The CSMR Unit conducted proactive and real-time system monitoring at the CCC on the polling day. Moreover, the APROs(IT) stationed at the polling stations on the polling day were also required to conduct regular checks on the IT settings and network conditions at the polling stations, and report to the CSMR Unit to facilitate early identification and immediate follow-up of any set-up and network issues.

12.23 The REO has also conducted multiple focused drills on the operation of the EPR system to ensure early identification of any potential operational issues. Among others, a rehearsal on technical system support for regular and contingency arrangements was held jointly with the DPO and the system contractor to simulate monitoring of the ballot papers issuing system by the technical support teams throughout the polling day, and to test the instant response capabilities of the technical support teams and the systems' resilience in case of special circumstances. In addition, the REO conducted a full-cycle rehearsal which simulated the entire process from the set-up of the systems at the polling stations to the completion of voting, with an aim to enhance trainings and arrangements for on-site technical support for the polling staff. The REO also formulated a clear communication plan on the enhanced resilience and contingency arrangements stated above, with a view to improving the coordination between the relevant Helpdesks of the CCC and the polling stations. The REO had, in accordance with the security arrangements under the "three-tier confirmation mechanism", submitted the system alterations, the aforesaid test results and the enhanced system resilience and contingency arrangements to the TAC for consideration and vetting, and was granted approval.

12.24 **Recommendation:** The REO has enhanced the system resilience and contingency arrangements in the By-e through proactive system monitoring and the mechanism of "instant response, rapid recovery". The EAC considers that such improvement measures are effective in ensuring the stability and sustainability of the overall system operation. Under the proactive system monitoring of the CSMR Unit, which was steered by the CDP, and the APROs(IT) stationed at the polling stations, the systems operated smoothly in general on the polling day, the EAC opines that the REO should continue to implement relevant measures in the 2025 LCGE and future elections, so as to ensure the system sustainability and give the electors a smooth voting experience.

12.25 The EAC is very thankful to the DPO for its extensive support on the enhancement of system resilience and contingency arrangements stated above, and deployment of a large number of technical support staff. The gratitude is also extended to the TAC for its valuable professional advice. As there will be more than 600 polling stations set up across the territory to provide polling service to over 4 million electors in the 2025 LCGE to be held this December, it is expected that the systems will face stress brought by a heavy flow of electors. The EAC considers that the REO should maintain close liaison with the DPO and mobilise sufficient technical support staff in any large-scale elections, especially for conducting real-time system monitoring at the CCC and the polling stations, as well as immediately implementing recovery plans when problems arise, with a view to reducing the impact on the ballot paper issuing process.

Section 13 – Concluding Note

Acknowledgement

13.1 The smooth conclusion of the By-e was attributed to the full dedication and concerted efforts of all parties involved.

13.2 The EAC and the REO are thankful for the support and assistance rendered by different government bureaux/departments and public bodies during the preparation for the By-e, especially members of the CMC including the CMAB, DoJ, HKPF, DPO, ISD, HKO and TD, etc.

13.3 The EAC would like to extend its sincere gratitude to the TAC and the DPO for their unwavering support and valuable advice on the EPR system and the use of the electronic counting system. The EAC would also like to express its appreciation to the HKPF, FSD, ICAC, AMS and CAS for their assistance and support in the By-e, including deploying staff to the polling stations and the CCS to ensure good order at these venues, so that the By-e could be conducted smoothly in an open, transparent, highly efficient and orderly manner. Additionally, the EAC further appreciates the HKO's provision of weather forecasts on the polling day, which enabled the EAC to prepare contingency plans for the adverse weather conditions.

13.4 The EAC is grateful to the individuals who served as ROs, AROs and members of the NACs in the By-e. The EAC would like to thank the polling and counting staff who conscientiously performed their duties and dutifully followed the relevant operational procedures. The EAC is also thankful to the REO staff, who provided unfailing support in the planning and conduct of the elections.

13.5 The EAC acknowledges the work of the media. Their extensive coverage of the activities relating to the By-e has indeed greatly contributed to enhancing public understanding and improving transparency of the elections.

13.6 Last but not least, the EAC offers its sincere appreciation to those who upheld the electoral legislations and guidelines throughout the By-e and those who cast their votes at the By-e.

Looking Forward

13.7 The By-e were completed in an open, honest and fair manner. The review and recommendations made on the electoral procedures and arrangements are set out in **Section 12**.

13.8 The EAC remains committed to fulfilling its mission of safeguarding the integrity of public elections in Hong Kong. It will continue with its efforts in keeping a vigilant watch over every election to ensure that openness, honesty and fairness are upheld in the conduct of every election. The EAC hopes that members of the public would continue to have a better understanding on the electoral legislations and electoral arrangements so as to maintain the good election culture in Hong Kong. The EAC always welcomes practicable suggestions to enhance future electoral arrangements.

13.9 The EAC recommends that this report be made public, at a time the CE considers appropriate, so that the public will have a clear understanding on how the EAC conducted and supervised the By-e.