

香港西醫工會
HONG KONG DOCTORS UNION

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22nd July 2005

Mrs. Eleanor Chow
Clerk to Bills Committee
Legislative Council Secretariat
3/F., Citibank Tower
3 Garden Road
Central, Hong Kong

By fax and mail

Dear Mrs. Chow,

Ref.: Waste Disposal (Amendment) Bill 2005

Thank you for your letter dated 11th July 2005 concerning the captioned subject.

Hong Kong Doctors Union is supportive to the Government's proposal on Waste Disposal Ordinance to reduce harm to the citizens by clinical waste. However there are areas where we feel a more flexible approach should be adopted to assist doctors in adhering to the proposed control method as stated in the Bill.

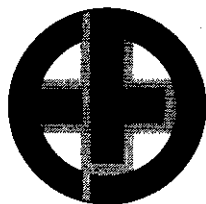
1. On separate treatment for syringe needles and syringe barrels

In our medical practice, the barrel parts of syringes are not hazardous for many reasons, such as:-

- (1) Most syringe barrels only contain remnants of medications and never come into contact with body fluids;
- (2) Some are parts of discarded expired syringes;
- (3) Syringe barrels without needles are often used to assist children taking medication;
- (4) Syringe barrels are used to inject fluid into catheters;
- (5) Syringe barrels used to inject air into certain medical instruments, e.g. foley's catheters.

As stated in Group 5 on Dressing under Schedule 8 of the captioned Bill, doctors are trusted and allowed to decide for themselves the degree of soiling and blood soaking of swabs and dressings that constitute medical wastes requiring special treatment. Now the same trust in our integrity and competence in distinguishing between contaminated and uncontaminated syringe barrels can be placed upon us by the Government. As such, we would suggest the Government to modify the definition of used or contaminated sharps in Group 1 of Schedule 8 on Groups of Clinical Waste to read as "syringe needles, syringe barrels, cartridges, ampoules and other sharp instruments which have been used or which have become contaminated with any other group of clinical waste".

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2. On allowing the staff of private clinics under doctors' direct supervision to transport clinical wastes to designated points or the Chemical Waste Treatment Centre

We urge the Government to allow the staff in private clinics on the captioned. Adequate and direct supervision of clinic staff by doctors should be safe and acceptable to the Government. Presently blood and other human samples with sharps are collected from clinics by messengers from laboratories. As the risk to the community would not be increased, we suggest these laboratories to be allowed to collect doctors' clinical wastes.

3. On designated collection points

We suggest the Government to establish convenient designated collection points in order to encourage doctors to comply with the scheme. All public outpatient clinics would be ideal sites for such establishment.

4. Grace Period

Since there is no report of improper handling of clinical wastes in the past few years in Hong Kong, our Union opine that there should be a grace period of at least 24 months for the practitioners to adapt to the Bill if enacted.

Finally let us reassure the Government that the great majority of doctors want to keep their clinical wastes safely packed and disposed of properly. Therefore, any measure that the Government introduce should be user friendly. By so doing it would appeal to doctors' sense of duty and respect and doctors are happy to comply and make Hong Kong a clean and saver place to live in.

Yours sincerely,

Dr. Ho Ock Ling
Hon. Secretary
Hong Kong Doctors Union