

Our Ref : CHM/376/05

16 July 2005

The Chairperson
Bills Committee
Legislative Council
Legislative Council Building
8 Jackson Road
Central, Hong Kong

Attention : Mrs Eleanor Chow

Dear Madam

**Re : Bills Committee on Waste Disposal (Amendment) Bill 2005 -
Meeting on 26 July 2005**

Thank you very much for your letter dated 12 July 2005 on the above-captioned subject. In the capacity of the administrator of a medium-sized private hospital in Hong Kong with about 200 beds I am submitting the following for the consideration of your committee :-

1. The introduction of the relevant amendment to the above Bill on Clinical Waste Disposal is timely and we welcome such a legislative regulation for the safety of healthcare workers and citizens of Hong Kong.
2. The requirements in the proposed amendment on the classification of clinical wastes (under Schedule 8) concerning the collection by licensed collectors and subsequent disposal at government designated sites or facilities are actually the norm in the daily practice of our hospital. I am confident to say that our colleagues, i.e. other members of the Hong Kong Private Hospitals' Association, are doing the same. This good practice is largely the concerted effort of the private hospitals in self discipline with focus on infection control and with the safety of hospital staff, patients and the general public being our first priority.
3. Having said that, I have to point out that with the expansion of service of the private hospitals a progressive and sizable increase in the generation of clinical waste is to be expected. Government has to ensure that there will be enough 'designated waste disposal facilities', be they government established or privately owned/run.

Union Hospital

4. In relation to the charges for clinical disposal, there are two important points which have to be considered. Firstly the charge has to be transparent and fair. By being fair I am referring to equal treatment of private and public hospitals, i.e. hospitals under the Hospital Authority. Since the overwhelming majority of clinical wastes are being generated in public hospitals, roughly at a ratio of 10 to 1 according to the distribution hospital bed numbers, payment by the private sector should not be seen as subsidizing the public hospitals if the latter enjoy a lower rate or have their own waste disposal facility such as incinerators built at the expense of the public purse. Secondly, we would accept the 'users pay' principle in the fee-schedule and it is fair that the fees charged would eventually cover the total operative costs provided that ALL users, i.e. both private and public hospitals, pay at the same rate. Moreover, since this is a matter concerning public health and safety, the government should not transfer the financial burden of building / establishing appropriate waste disposal facilities to the private healthcare sector and Hong Kong citizens by attempting to eventually recover the capital costs of these facilities from the fees charged.

Thank you very much for your kind attention,

Yours sincerely

Dr Anthony K Y Lee
Chief Hospital Manager & Medical Director

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