

**Disposal of Clinical Waste - A submission from the Dental Council of Hong Kong**

In response to the Proposed Clinical Waste Control Scheme Consultation Document, the Council has the following submission in relation to the dental profession:

**On Code of Practice**

1. We welcome the proposal of setting a new regulation to control the collection, transport and disposal of clinical waste.
2. We support the establishment of Code of Practice to provide guidance on the proper management of clinical waste.

**On Classification of Clinical Waste:**

1. We agree in principle on the definition of Group I clinical waste which is relevant to the dental profession including used syringe/ needles/ cartridges/ scalpels and sharps.
2. We welcome the proposal that bibs/ paper towels/ cups/ extracted teeth/ plastic barriers/ disposable gloves/ cottons/ swabs/ dressings/ saliva ejectors are NOT classified as clinical waste.

**On Cost of Clinical Waste Collection:**

1. There should be a mechanism to monitor the cost of clinical waste collection.
2. The government should set up Clinical Waste Collection stations at cost with trip tickets issued for small amount of clinical waste collection. This could avoid pseudo-monopoly.

**On Punishment**

1. Penalty level of maximum fine of \$200,000 and imprisonment of 6 months is far too high for the dental profession at large, especially punishment by imprisonment.
2. A grace period is necessary to allow waste producers to find the suitable clinical collectors of their choice. (Some remote clinics might have difficulties in finding a suitable collector).
3. The trip ticket system to facilitate tracking is agreed, but a warning notice should be first given before prosecution.
4. Record keeping of trip ticket for inspection is 2 years. (Longer period won't be helpful in tracking.)
5. Proper guidelines should be made available for necessary safety measures in handling clinical waste, especially on storage, packaging, labeling and transportation.