



香港眼科視光師學會

The Hong Kong Society of Professional Optometrists

T.S.T. P.O. Box 98603, HK

Voice mail system: 3126 9938

Fax: 3126 9980

Website: www.hkspo.org.hk

LC Paper No. CB(2)221/10-11(01)

Dr Hon LEUNG Ka-lau
Chairperson of the Health Service Panel

29 October 2010

To: Dr Hon LEUNG Ka-lau

Re: Regulations of distribution and sale of contact lenses

One of the main duties of the optometrist profession is to protect the public's eyes. To achieve this goal, optometrists have to follow a strict code of practice to examine the patients first before prescribing optical corrections, whether it is spectacles or contact lenses.

We note that there is a growing trend in Hong Kong of obtaining contact lenses through online web sites, blogs or cosmetic shops, be it with prescriptions or for cosmetic purposes only. The quality and safety of these lenses are neither monitored by the retailers (web masters, bloggers, or cosmetic shop sales) nor by the consumers. The origins of some of these lenses are actually untraceable. A lot of these contact lenses are purchased by young people, most of them in their teens, without professional assessments. It generates great health risks as unsafe lenses and improper use of contact lenses could have dire consequences, such as infection of eyes, short term or permanent sight deterioration and even blindness.

Sadly, under current legislation, there is no specific ruling on the distribution and selling of contact lenses in Hong Kong. Contact lenses with plano prescription is not even classified as medical device and is sold as general consumer product. A voluntary Medical Device Administrative Control System (MDACS) was implemented in 2004 but there has been little progress up to this moment.

We, as professionals in eye care, would urge the government to rectify this situation with the following changes in regulations regarding the distribution and selling of contact lenses:

1. Contact lenses shall be classified as a medical device, regardless whether it is a minus, plano or plus prescription. The risks associated with these lenses are EXACTLY the same.

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2. ALL contact lenses shall only be distributed under one of the following conditions:
 - A. From a registered distributor to a shop or company that is operated under the supervision of qualified eye care professionals; or
 - B. From a registered distributor to an institution (hospital, university or research center) which is under the supervision of qualified eye care professionals.
3. ALL contact lenses shall only be dispensed to the general public under one of the following conditions:
 - A. With valid prescription by optometrist or ophthalmologist; or
 - B. When a valid prescription is not available, examination by optometrist or ophthalmologist is required.

We are writing to express our deep concerns and ask the Department of Health to take immediate actions in amending the legislation to ensure better safety and protection to the general public.

Yours Sincerely,

Rufina Chan

Patrick Cheng

Lo Hing Nam

The Hong Kong Society of
Professional Optometrists

The Hong Kong Association of
Practicing Optometrists

The Hong Kong
Optometric Association

Cc: all members of the Health Service Panel