



3 December 2013

Dr Hon LEUNG Ka-Lau, JP
Chairman, Panel on Health Services
Legislative Council
Hong Kong Special Administrative Region

Dear Dr Hon Leung

Regulation of Pharmaceutical Products in Hong Kong

The Department of Pharmacology and Pharmacy, The University of Hong Kong supports the 75 recommendations proposed by the Review Committee to raise the standards of pharmaceutical industry and enhance the regulation of pharmaceutical products in Hong Kong. We have several comments in response to The Administration's response to the recommendation.

Recommendation no. 18 & 29: All wholesalers and retailers of non-poisons shall be subject to inspection and licensing control.

The Administration concerns the impact to the large number of direct sellers of non-poisons and the cost to trade arising from the wide range of products involving huge volume. Our primary concern is the safety to the public. Therefore, we suggest that any non-poisons that are classified as pharmaceutical products, all wholesalers and retailers of the products should be subject to inspection and licensing control.

Recommendation no. 19: All wholesalers are required to (i) keep transactions records of all pharmaceutical products, including Part II poisons and non-poisons in the same manner as for Part I poisons; and (ii) keep samples of each batch of drugs handled to facilitate investigations when needed.

For safety reason, the wholesalers should keep transactions record of all pharmaceutical products so that the source should be traced accordingly when needed. However we do agree with the Administration proposal that as long as the traders can provide samples within specified period upon request, it is not necessary for wholesalers to keep samples of each batch of drugs handled.

Recommendation no. 30: Registered pharmacist should be present at authorized seller of poisons ('ASP') whenever an ASP is open for business.

We fully support the requirement of registered pharmacist to be present at ASP whenever an ASP is open for business, to ensure that the ASP can offer safe and professional pharmaceutical service to the general public. Regarding the concern of insufficient pharmacists, Hong Kong has



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around 600 ASP, and to increase the manpower by 1/3 to allow the implementation of this recommendation, we will need about 200 extra pharmacists. Starting from 2014, HKU and CUHK together will have around 80 pharmacy students graduate per year. In addition to the pharmacists trained abroad, there should be enough pharmacists to cover the extra manpower. Therefore, we do not agree with the Administration's view on insufficient pharmacists. On the contrary, we consider that this is an important recommendation that should be implemented to improve and raise the standard of pharmaceutical service in Hong Kong.

Recommendation no. 33: Give the Pharmacy and Poisons Board the authority to revoke the licence of an ASP at any time after the ASP has been convicted of serious offence.

We support the recommendation, and any cases of conviction should go through a Disciplinary Committee of the Pharmacy and Poisons Board.

Thank you for your attention.

Yours sincerely

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