



**Legislative proposals to enhance the regulation of pharmaceutical products
(The special meeting on 10 December 2013)**

The Society of Hospital Pharmacists of Hong Kong (SHPHK) supports all the legislative proposals put forward by the Administration in the light of the 75 recommendations made by the Review Committee on the Regulation of Pharmaceutical Products in Hong Kong in 2009 with the following comments:

1. General Provisions

SHPHK supports the Administration's initiative to provide guidance and enhance monitoring for the conduct of the activities of different licensed traders (including manufacturers, wholesalers and retailers), but not registered pharmacists. Like the Medical Council and Nursing Council, the Government should facilitate to set up a **Pharmacy Council** as earliest as possible to oversee the registration, conduct and discipline of Pharmacists in Hong Kong in order to resolve the conflicting roles of the Department of Health and enhance the professional autonomy and development. The Code of Ethics or Conduct should be introduced for registered pharmacists instead of the Code of Practice. It is inappropriate for using Code of Practice to provide guidance to pharmacists who need to make clinical judgment and provide pharmaceutical care to the public with various health issues

The serious drug and medical device related incidents occurred in Hong Kong highlight the importance of engaging Pharmacist professionals in the director level for dealing with important public health issues. The Government should set up a **Centre for Drug and Medical Device Safety** headed by a Pharmacist professional to enhance the medication and medical device safety as discussed at the Review Committee on the Regulation of Pharmaceutical Products in 2009. It is important that the Head of this Centre must be a Pharmacist as Pharmacist is a medication and medical device safety expert and has a balanced and holistic view on public health issues.

2. Regulation of Manufactures

The qualification requirements of Authorized Person (AP) should include that the AP must be a registered pharmacist who is knowledgeable in special and important areas for drug manufacturing, namely pharmaceuticals, quality assurance and medication safety.

3. Regulation of Retails

SHPHK fully supports the legislative amendment after considering the public interest and safety that registered pharmacist employed by an authorized sellers of poisons (ASP) will be required to be present whenever the ASP is opened for business. We estimated that the number of registered pharmacists required for full implementation of this proposed provision are 300 – 350. As we have about 80 new pharmacist graduates from local universities and plus 20 pharmacist graduates from overseas each year, it takes about 4 to 5 years to take effect. The Administration should set a target of 4 to 5 years for full implementation and announce the target year in the Gazette as earliest as possible. More importantly, the Food and Health Bureau should formulate strategies, e.g. public-private partnership with Hospital Authority for drug dispensing and medication review, drug management for Old Aged Homes (OAHs), Visiting Pharmacist Officers for OAHs, to expand the roles and duties of community pharmacist as one of the main primary care providers in Hong Kong.

The SHPHK is also aware of the drastic increase in the number of listed sellers of poisons (LSP) opened in the community in the past two years. Currently, the total number of LSP are 3920 which is about **6.6 times** as many as ASP (590). The existing of LSP is not essential and causes confusion to the public. The LSP have no pharmacist professional to safeguard the health and safety of public and increase the workload of Department of Health. For the sake of monitor and public interest, the SHPHK urges the Government to cease the issue of LSP license anymore.

4. Written Orders of Drugs

The SHPHK fully supports the requirement of written orders of drugs for the patient safety and increase in transparency of drug transaction. We disagree to remove the requirement from the legislative proposals as suggested in the LC Paper No. CB(2)254/13-14(03). It is because only a few private doctors comply with the requirement of written orders of drugs recommended in the Good Dispensing

Practice Manual (GDP Manual) issued by the Hong Kong Medical Association in 2007. It is further admitted by another doctor association. The Administration should not simply rely on the recommendation of GDP Manual which is written by one of the medical professional bodies, Hong Kong Medical Association and no consensus is reached among all medical professional bodies. The compliance rate is highly uncertain and questionable. The safety of public is comprised by non-legislative control.

A handwritten signature in blue ink, appearing to read 'Chui', is enclosed in a light blue rectangular box.

CHUI, Chun Ming William

President

Society of Hospital Pharmacists of Hong Kong

5th December 2013