



8th December 2013

To: LegCo Panel on Health Services

**Legislative Proposal to Enhance the
Regulation of Pharmaceutical Products in Hong Kong**

The College of Pharmacy Practice supports the 75 recommendations proposed by the Review Committee on the Regulation of Pharmaceutical Products in Hong Kong to raise the standards in the pharmaceutical industry and to enhance safety on use of medicines by the public.

We have the following comments on the Administration's response to the recommendations by the Review Committee:

A. Guiding principles adopted by the College

- 1) Medicines are not ordinary commodity consumables. They are useful but also dangerous. They can save lives but also can kill people. Therefore, medicines must be handled by trained specialists under a Code of Ethics.

- 2) The end point of any proposed measures, be it legislation or by code of practice, must be to safeguard the appropriate use of good quality medicines to keep people healthy. The measures can be implemented by phases if necessary, but there must be a defined schedule within a reasonable time frame.

B. Comments on the Administration's response:

- 1) Recommendation 6: Empower the Pharmacy & Poisons Board to maintain an Authorised Person ("AP") register and remove any AP from the register should the AP be found incompetent to perform the role of an AP.

We support to maintain a register of Authorised Person for all drug manufacturers. The AP should be a registered pharmacist with specialist qualification in pharmaceuticals and quality assurance.



- 2) Recommendation 18 & 29: All wholesalers and retailers of non-poisons shall be subject to inspection and licensing control.

The Administration proposed not to impose licensing control on retailers of non-poisons based on the significant operational and financial impacts to the large number of such retailers. We are of the opinion that the sale of all pharmaceutical products registered with the Department of Health should be under systematic control and inspection. This will ensure proper storage, handling and sale of medicines for safety reasons.

- 3) Recommendation 30: Registered pharmacist should be present at authorized seller of poisons ("ASP") whenever an ASP is open for business.

We support the recommendation to have a registered pharmacist present during all the opening hours of ASP. The pharmacist performs multiple roles – dispensing medicines, providing health advice and education, providing treatment for minor ailments, consultation with medical practitioners on dispensed medications etc. All these must be performed by a pharmacist and not by any one working in the ASP.

There are at least two aspects to be addressed on this issue: manpower and appropriate use of pharmacists' expertise.

The two universities' pharmacy undergraduate programs provide 80 graduates per year. There are also 20-30 overseas graduates registered each year. With the current 579 ASP in HK, it is estimated that about 250-300 additional pharmacists are need for the recommendation. This should take 3-4 years for sufficient number of pharmacists to be available. The Administration should set a reasonable time frame to implement the recommendation taking into consideration of the above provisions.

The Administration should give serious consideration to fully utilize the pharmacists' knowledge and expertise, and to expand the roles and responsibilities of community pharmacists. Many initiatives have been undertaken by community pharmacists in managing the drugs for OAH residensts and providing advices to OAH. These should be appropriately



recognized. Collaboration with the public sector should be enhanced to relieve the pharmacy workload of the public hospital system.

4) Written order for drugs

Written order is the norm for all trades, and it should be more stringent in the pharmaceutical industry and medical service as proper documentation is an essential component in ensuring correct and safe supply and dispensing of medicines. There are many look-alike sound-alike drugs nowadays. Written orders will enhance proper checking upon drug ordering, receipt, and easier track & trace of drug supplies.

Benjamin Shing Cheung Lee
Chairman,
College of Pharmacy Practice