



Prof. CHEUNG Nga Yin, Annie
President

c/o Department of Pathology, The University of Hong Kong,
Queen Mary Hospital, 102 Pokfulam Road, Hong Kong
Tel.: (852) 2255 4875 Fax: (852) 2872 5197 E-mail: anycheun@pathology.hku.hk

THE HONG KONG COLLEGE
OF PATHOLOGISTS
A Constituent College of the
Hong Kong Academy of Medicine

15 December 2013

President
Prof. CHEUNG Nga Yin, Annie

Dr Hon LEUNG Ka-lau
Chairman
Panel on Health Services
Legislative Council of the HKSAR
Legislative Council Complex
1 Legislative Council Road
Central
Hong Kong

Vice-Presidents
Dr. CHAN Ho Ming
Dr. MA Shiu Kwan, Edmond

Registrar
Dr. CHAN Chak Lam, Alexander

Dear Dr LEUNG,

Deputy Registrar
Dr. TANG Wai Lun

Re: Panel on Health Services Special meeting on Monday, 23 December 2013

Honorary Treasurer
Dr. CHAN Kui Fat

Thank you for inviting us to attend to the captioned meeting. The Hong Kong College of Pathologists would not comment on the seven recommendations made by the Working Group on Differentiation between Medical Procedures and Beauty Services (Working Group) under the Steering Committee on Review of the Regulation of Private Healthcare Facilities (Steering Committee). However, we would like to express our great concern on the omission of recommendations on regulating medical laboratory while there are recommendations on regulating medical device.

Immediate Past-President
Dr. SUEN Wang Ming, Michael

Council Members
Prof. HO Pak Leung
Dr. IP Pun Ching, Philip
Dr. LAI Sai Chak
Dr. MAK Siu Ming
Dr. TSANG Ngai Chong, Dominic
Dr. WONG Lap Gate, Michael
Dr. YUEN Wah Fun, Nancy
Dr. YUEN Yuet Ping

The Steering Committee and the Working Group were setup in response to an incident of intravenous infusion of cells processed by a laboratory, resulting in serious infections and one fatality. However, very little attention has been paid on regulating medical laboratory in Hong Kong. We understand that another Working Group on Regulation of Premises Processing Health Products for Advanced Therapies was setup under the Steering Committee to define and came up with the range of health products for advanced therapies that could be conducted in laboratory/ambulatory setting and examine whether and how to impose regulatory control on premises where health products for advanced therapies and high risk sterile products are stored and/or processed. Nevertheless, we are very concerned that the scope of examination is too narrow and the need of regulating medical laboratory in general is not adequately addressed.

College Secretary
Ms. YUNG Wing Yan, Adrienne

Honorary Legal Advisor
Ms. Helen CHAN
LO & LO Solicitors & Notaries
Public

Auditor
CCP C.P.A. Limited



THE HONG KONG COLLEGE
OF PATHOLOGISTS
A Constituent College of the
Hong Kong Academy of Medicine

President

Prof. CHEUNG Nga Yin, Annie

Vice-Presidents

Dr. CHAN Ho Ming

Dr. MA Shiu Kwan, Edmond

Registrar

Dr. CHAN Chak Lam, Alexander

Deputy Registrar

Dr. TANG Wai Lun

Honorary Treasurer

Dr. CHAN Kui Fat

Immediate Past-President

Dr. SUEN Wang Ming, Michael

Council Members

Prof. HO Pak Leung

Dr. IP Pun Ching, Philip

Dr. LAI Sai Chak

Dr. MAK Siu Ming

Dr. TSANG Ngai Chong, Dominic

Dr. WONG Lap Gate, Michael

Dr. YUEN Wah Fun, Nancy

Dr. YUEN Yuet Ping

College Secretary

Ms. YUNG Wing Yan, Adrienne

Honorary Legal Advisor

Ms. Helen CHAN

LO & LO Solicitors & Notaries
Public

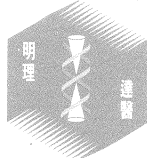
Auditor

CCP C.P.A. Limited

Pathologists are medically-qualified specialists trained to supervise the provision of quality medical laboratory services, and to advise bedside clinical colleagues in the appropriate selection and result interpretation of laboratory testing for patient management. Our College would like to take this opportunity to point out the existing inadequacies of the system, jeopardizing the quality of medical laboratory services in Hong Kong.

The medical laboratory is NOT legally defined in Hong Kong. While in countries like United States or Singapore, medical laboratory is legally defined and regulated. As a result of lack in legal definition, a register of medical laboratories does NOT exist in Hong Kong. The government has no way to know how many medical laboratories exist and what kind of services they are providing. There is no requirement for medical laboratories to be supervised by a Pathologist of the relevant subspecialty, to ensure laboratory reports are clinically relevant, compatible and appropriately interpreted for patient management purpose. In the public healthcare sector, medical laboratories are run by a Department of Pathology. Most of these medical laboratories are supervised by Pathologists. Even for the smaller medical laboratories that could not afford a full time Pathologist, they are served by Pathologists from larger medical laboratories on a consultation basis. In contrast, things are very different in the private sector. Many medical laboratories have no serving Pathologist. In Hong Kong, anyone could run a medical laboratory as long as they hired a medical laboratory technologist who is registered under the Chapter 359A Medical Laboratory Technologists (Registration and Disciplinary Procedure) Regulations. Those medical laboratories similar to the one involved in the cosmetic medicine incident don't even require to hire a registered medical laboratory technologist as these laboratories only process stem cells and do not issue laboratory reports that are used for patient management. It is very clear that the regulation of medical laboratory in Hong Kong is extremely loose.

It is our strong view that medical laboratories must be supervised by medically-qualified professionals who have been trained in providing laboratory service of corresponding Pathology subspecialties, to the best interest of patients and the public in Hong Kong. Legislation is also required to mandate registration of medical laboratories for their effective regulation.



THE HONG KONG COLLEGE
OF PATHOLOGISTS
A Constituent College of the
Hong Kong Academy of Medicine

President

Prof. CHEUNG Nga Yin, Annie

Vice-Presidents

Dr. CHAN Ho Ming

Dr. MA Shiu Kwan, Edmond

Registrar

Dr. CHAN Chak Lam, Alexander

Deputy Registrar

Dr. TANG Wai Lun

Honorary Treasurer

Dr. CHAN Kui Fat

Immediate Past-President

Dr. SUEN Wang Ming, Michael

Council Members

Prof. HO Pak Leung

Dr. IP Pun Ching, Philip

Dr. LAI Sai Chak

Dr. MAK Siu Ming

Dr. TSANG Ngai Chong, Dominic

Dr. WONG Lap Gate, Michael

Dr. YUEN Wah Fun, Nancy

Dr. YUEN Yuet Ping

College Secretary

Ms. YUNG Wing Yan, Adrienne

Honorary Legal Advisor

Ms. Helen CHAN

LO & LO Solicitors & Notaries

Public

Auditor

CCP C.P.A. Limited

We urge the Panel on Health Services of the Legislative Council to take a closer look at the need of regulating medical laboratory and ensure the issue is adequately addressed by the Steering Committee. As qualified professionals, we are always ready to advise on issues related to the practice of laboratory medicine.

Thank you for your attention.

Yours sincerely,

Professor Annie NY CHEUNG
MBBS, MD, PhD, FRCPath, FHKAM(Path)
President, on behalf of the Council
The Hong Kong College of Pathologists