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Our Ref.: HKDU/099/2015

18th June 2015

By email and fax

Dr. the Hon. Joseph Lee Kok Long
Chairman
Panel on Health Services
Legislative Council Complex
1 Legislative Council Road
Central, Hong Kong

Dear Dr. the Hon. Lee,

Re: Hong Kong Doctors Union Submission on Regulations and Development of Beauty Services

Hong Kong Doctors Union (HKDU) agrees totally with the attempts by the Government to revise her regulations of cosmetic medicine and cosmetic procedures.

HKDU also support the following recommendations put forward by the Steering Committee on Review of Regulation of Private Healthcare Facilities in November 2013:-

- (1) Cosmetic procedures that involve injections should be performed by registered medical practitioners.
- (2) Procedures that involve the mechanical/chemical exfoliation of the skin below the epidermis should be performed by registered medical practitioners.
- (3) Traditional body tattooing and piercing should be exempted from being considered as a "medical procedure", but special care should be taken for procedures performed on body parts which have higher risk of complications (e.g. near the eyes, the tongue, etc). All practitioners should be well trained and adopt infection control measures when performing the procedures. Practitioners should ensure that consumers are aware of the inherent risks involved and make informed decisions.
- (4) Hyperbaric oxygen therapy should not be performed as a form of beauty procedure. In view of its risks of complications, it should be performed by registered medical practitioners on patients with clinical indications.

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**HONG KONG
DOCTORS UNION
香港西醫工會**

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- (5) Dental bleaching may lead to complications, especially if performed inappropriately or performed on inappropriate clients, such as those suffering from pre-existing dental conditions. The procedure should be performed by registered dentists.
- (6) It supports the Administration's plan to regulate medical devices through legislation and to exercise control over the use of selected high-risk medical devices.
- (7) It recommends the setting up of an expert panel under future legislation to advise on the risk and appropriate controls over new cosmetic procedures based on innovative technology.

HKDU considers cosmetic medical procedures should be performed by registered doctors only and not by lay people in view of possible deleterious side effects requiring ultimate management by doctors. Furthermore, if performed by doctors bound by medical ethics, they can be held responsible for mishaps. An example is the DR incident a few years ago when qualified personnel involved are being prosecuted. On the other hand, when cosmetic medical procedures are performed by medically unqualified operators and not qualified doctors, no protection is offered to the clients. For example, in the case of an actress treated by a so called "professor", liability is impossible to trace and this layman disappear and get away scot free.

Yours sincerely,

Dr. Ho Ock Ling
Hon. Secretary
Hong Kong Doctors Union

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