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**The Hong Kong Medical association**

**Submission to the Legislative Council Bills Committee on  
Chinese Medicine Bill**

We welcome the legislation in formalising the registration and regulation of Chinese medicine practitioners and traders. However, the bill itself does not state with sufficient clarity as to what the practice of Chinese medicine is or is intended to be, In particular, we note the definition of “practising Chinese medicine” is defined on the basis of traditional Chinese medicine. However, there is no further explanation of what traditional Chinese medicine includes or excludes. In that context, no matter how well structure the registration and/or the licensing system is one is in doubt as to what the scope of Chinese medicine practice is and hence to be regulated for the benefit of the people of the Hong Kong Special Administrative Region. We do hope that the Administration or the Advisory Committee will clarify this issue. Furthermore, such clarification is important to the future development of the practice of Chinese medicine in Hong Kong.

致立法會《中醫藥條例草案》法案委員會  
有關《中醫藥條例草案》的意見

香港醫學會歡迎政府訂立法例，就中醫的執業及中藥的規管設立及注冊制度，然而，《中醫藥條例草案》並沒有就何謂「中醫藥」作出清晰的定義，其中，本會留意到條例草案以傳統中醫藥作為界定「以中醫方式行醫」的基礎，惟對於傳統中醫藥的涵蓋範圍卻未見闡釋，因此，即使草案為中醫藥的監管奠下如何完善的註冊及發牌制度，在「以中醫藥的執業範圍」未能具體界定的情況，保障市民健康的成效將令人成疑，本會希望政府或諮詢委員會能就此作出澄清。事實上，這澄清對於中醫藥的未來發展十分重要，亦會為之帶來裨益。