



Hong Kong Institute of Occupational and Environmental Hygiene

香港職業及環境衛生學會

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Your Reference: EMBCR 1/2961/95

Chairman,
c/o Mrs. Constance LI
Clerk to Sub-committee of Legislative Council,
Sub-committee on Regulations relating to
Occupational Safety and Health
3/F, Citibank Tower
3, Garden Road, Central, Hong Kong

21 September 1999

Dear Mr. Chairman,

Support of the Proposal of the Medical Examination Regulation
and the Related Amendments

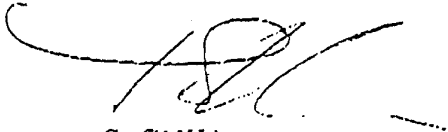
The Hong Kong Institute of Occupational and Environmental Hygiene is founded by a group of practicing occupational hygienists in 1991. The mission of the Institute is to develop the profession of occupational hygiene and to promote a better working environment for the benefit of employers and employees in Hong Kong. To keep abreast with international development on occupational hygiene, the Institute is a member of the International Occupational Hygiene Association (IOHA). On promotion of occupational hygiene, the Institute has host the Second International Scientific Conference of IOHA in Hong Kong in 1994 and regular seminars for members and non-members of the Institute. Currently, the Institute has about 100 individual members and 10 company members. The individual members are working in big private firms, universities and academic institutes and in government departments as practising hygienists, doctors, engineers and other health allied professionals.

We understand that the Government is going to review the health surveillance legislation. We, after careful study of the issues, generally support the proposal of the new regulation of medical examination for workers and the related amendments. The followings are comments from our Council, and we wish they could be considered and incorporated into the relevant parts of the Regulation or its subsequent Code of Practices (COP) if available: -

1. We agree that the purposes of setting the Regulation have dual roles - pre-employment examination (medical screening) and medical surveillance (periodic examination). They are the two basic strategies for optimising employees' health. The functions must be stated very clearly in either the Regulation or the COP, together with advice on the appropriate follow up actions of employers and employees.
2. The success of the Medical Examination Programme depends on the available number of qualified medical practitioners and allied fields. In case there is a shortage of appointed medical practitioners (AMP), the authority should consider to have a longer grace period than usual before actual enactment of the Regulation.
3. Medical Examination is part of the health surveillance programme for workers. Another equally important aspect that an occupational hygienist can contribute is through environmental monitoring and control of the workplaces. The importance and relationship of the two approaches should be explained clearly in either the COP or the other relevant publication. Through effective control of the working environment, exposures to occupational hazards can be eliminated and reduced. The large number of workers subjected to medical examination could also be reduced. It is worthwhile to consider the incorporation of environmental monitoring into future occupational safety and health legislation programme.
4. We support the role played by the CITA because it can eliminate the problems due to short-term employment of the casual workers in the construction sites.

We sincerely hope the Sub-committee can consider the above opinions carefully and have the Regulations fine tuned before enactment.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'K.S. CHIU', written in a cursive style.

K.S. CHIU,
President of ILOEHI

c.c. Dr. Raymond Leung, OHC, Labour Department