

香港家庭醫學學院的信頭  
Letterhead of The Hong Kong College of Family Physicians

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**The Chairman & Members of the  
Subcommittee on Regulations relating to Occupational Safety and Health**  
Legislative Council Secretariat  
Legislative Council Building,  
Jackson Road,  
Central,  
Hong Kong

Dear sir,

**Factories and Industrial Undertakings  
(Medical Examinations) Regulation**

The Hong Kong College of Family Physicians respectfully submit the following comments with regard to appointment of medical practitioners to conduct pre-employment and regular medical examinations of workers who may be subjected to hazardous substances and physical agents at work for early detection of absorption of the hazardous substances and for the early prevention of occupational diseases.

1. Family Physicians are specialists who have undergone extensive training and are quite capable of obtaining detailed medical histories which include occupational history as well as to perform thorough physical examinations. The Fellowship Examination and Exit Assessment leading to specialist in Family Medicine status are assessment processes that assure competence and quality. The Hong Kong College of Family Physicians is of the opinion that the Hong Kong College of Community Medicine had not studied the training program and Fellowship Examination of the Hong Kong College of Family Physicians before they made the recommendation that all Appointed Medical Practitioners have to take courses in Occupational Medicine.
2. The Hong Kong College of Family Physicians cannot agree that Family Physicians need to attend a course in occupational medicine before they can be appointed as medical examiners. We have studied requirements of the stipulated examination of workers in contact with hazardous substances and we do not see any skills that Family Physicians do not possess that require further training.
3. It is not the intention of Family Physicians to claim equivalent qualification as Occupational Physicians, but Family Physicians are indeed competent to perform the particular task of examining workers before employment and at regular intervals for early detection and prevention of occupational diseases.
4. If indeed risk factors or diseases related to their occupation have been detected in the prospective worker, it is anticipated that the workers will ultimately seek treatment and advise from their family physicians. It follows that Family Physicians are the most appropriate doctors to carry out the aforementioned examination.

5. At present the number of doctors in private practice who have attended the “required” course in occupational medicine are few (approximately 25) to cater to the needs of 195,000 workers. Moreover, the number of Occupational Physicians in private practice is even fewer.
6. With the large volume of workers requiring examination, it is likely that the examination will be put to tender by CITA (Construction Industry Training Authority) who will be responsible for the administrative arrangements of the medical examination of construction workers who make up the majority of workers requiring examination. Our College is of the opinion that there must be quality assurance mechanisms to ensure that the examination is indeed carried out by the individual Appointed Medical Practitioner and that the duty is not designated to an untrained doctor. There are over one hundred Family Physicians in private practice and all of them have to undergo continuing medical education and fulfill quality assurance exercises stipulated by our College. This continuous professional development process will ensure our Fellow Family Physicians are updated with new developments including subject related to Occupational Medicine.
7. If the competence of Family Physicians to perform the task of examining workers were indeed in doubt, an assessment would be the method of ascertaining the fact. Furthermore, there is no reason why Family Physicians should be required to take a course before they are allowed to be assessed by the appropriate authorities.

I sincerely hope members of the committee will take the above comments into consideration before adopting recommendations by the Occupational Health Advisory Committee in appointing Appointed Medical Practitioners (AMP) to examine workers who will be in contact with hazardous substances Please do not hesitate to contact me if I could provide further information.

Yours truly,

Donald K.T. Li  
President, HKCFP