

**Comments on the Factories & Industrial Undertakings  
(Medical Examinations) Regulations**

**Presented to the Bills Committee Meeting on 27.9.99**

**By Mr. Eric Lee (Vice President) &**

**Mr. Rheo Lam (Hon. Secretary)**

**General**

The Society of Registered Safety Officers supports in principle the legislation. We have the following comments after consultation with our members.

**1. Occupational & NOT Only Industrial**

We believe there are other employees in other occupations outside the jurisdiction of the F. & I.U. Ordinance who are exposed to similar if no less serious a risk as the industrial counterparts e.g. medical laboratory technicians, health care workers of the Hospital, laboratory staff of the higher institutions who are exposed to similar physical agents or hazardous agents are in need of the protection.

We believe and advocate to make the Regulation under the Occupational Health & Safety Ordinance.

**2. How many Medical Examinations**

If a worker, e.g. in the scrap yard, is expected to expose to most if not all the hazardous agents, is he required to undergo all the medical examinations as specified in schedule?

**3. The Element or Its Compound**

In the Regulations when an element is mentioned, e.g. lead, cadmium, mercury, etc; does it apply to the element in its raw form or it includes its compounds or mixtures containing them?

It must be noted that many chemicals do possess impurities of these elements, and it may not be brought to the knowledge and attention of the suppliers let alone the employees or employers.

Can we request the legislation to be more explicit and specific on its legislative intent?

Will the legislation apply to a painter in an industrial undertaking if the thinner he uses contains Benzene which happens to be likely one of the impurities?

**4. Use of the Medical Results**

The community is going to pay out a lot of resources for the compliance of this medical

examination legislation. Could we ask if there is any commitment or plan of the Government to see to that if such results of the medical examination can be systematically and resourcefully transformed into data and records for improving the health and safety of the workforce in the future?

One of the useful area is to monitor the usefulness and effectiveness of this medical examination requirements.