



香港社會醫學學院
HONG KONG COLLEGE OF COMMUNITY MEDICINE
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Dear CH

Re: Factories and Industrial Undertakings (Medical Examinations) Regulation

Thank you for your letter of 18 September 1999.

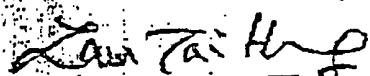
The Hong Kong College of Community Medicine strongly support the captioned regulation. The proposed regulation is in line with the recommendation of the Report of the Expert Working Group on Occupational Health Services (Chair: Dr Margaret Chan, Department of Health). With regard to letter of Dr Donald K T Li, President of Hong Kong College of Family Physicians, dated 17 September 1999. My comments are as follows:

1. First of all, occupational medicine and family medicine are two distinct specialties. Occupational Medicine is a specialty which aims at keeping workers fit for work and monitoring their health rather than treating established diseases. Occupational health practice provides good opportunities to look at workers in relation to their hazardous work environment. The medical examinations also aim to complement environmental monitoring in assessing whether the control measures are adequate or not.
2. I understand that, although after passing the legislation, a guide will be issued to all Appointed Medical Practitioners (AMP) to standardize all the essential medical examinations procedures and recommendations, AMPs have to determine the health hazards exposed by individual workers in the workplace. A worker with a similar occupation by name may be exposed to different health hazards. The AMP with knowledge in occupational medicine will be able to determine the potential hazards a worker may be exposed to, whether health surveillance is required and if so, the medical examination requirements and relevant standards to be applied in determining that worker's medical fitness.

3. Medical examination is a good starting point for a more positive and productive approach to health education and life style education in occupational settings where hazardous chemicals and physical agents are handled. With knowledge and training in occupational medicine, an AMP will be able to provide the worker with appropriate occupational health counselling such as the selection and proper use of appropriate personal protective equipment.
4. It is a generally accepted overseas and also the International Labour Organization's recommendation for medical examinations for workers exposed to hazardous chemicals and physical agents to be medically examined by doctors qualified in occupational medicine.
5. I would like to point out that just passing an examination without proper training in occupational medicine is not adequate. A training course must have built in factory visits and practical sessions in environmental monitoring in order to allow doctors with first hand information in various occupational settings, their potential health hazards and the various control measures available. Without such training and experience, it would be difficult to determine the appropriate medical surveillance required, and the appropriate health advice to the workers.
6. As regards the supply of AMPs, the Labour Department estimates that about 25 AMPs are currently in private practice. Moreover, another 10 doctors have enrolled in the 1999/2000 Diploma in Occupational Medicine course run by the Chinese University of Hong Kong. With the passing of the Factories & Industrial Undertakings (Medical Examinations) Regulation, we anticipate that more doctors in the private sector will undertake the necessary training and become qualified AMPs. Nevertheless, the situation should be monitored to ensure that the supply is adequate before the full implementation of the Regulation. Phased implementation should be adopted.
7. Lastly, I am pleased to note that the Hong Kong College of Family Physicians (HKCFP) has determined to re-examine their vocational training programme. I am more than happy to see that more family physicians are interested in occupational medicine to join hands with us to further enhance the health of all workers in Hong Kong.

Many thanks for your attention.

Yours sincerely



Professor T H Lam, MD, FFPHM, FFOM, FHKCCM, FHKAM, FRCP

cc HKCCM Council members
Dr Donald Li
Dr W K Lo