

Chairman and Members  
Health Services Panel  
LegCo  
Jackson Road, Central.

Dear Hon LegCo Members,

I would like to comment on the Panel meeting in 13 December 1999, in related to the part for the amendment of Regulation 26(1) of Radiation (Control of Irradiating Apparatus) Regulation as raised by our Association.

Arguments given by the Health and Welfare Bureau (H&WB) and the Radiation Board during or before the meeting for not amending Regulation 26(1) reinforce our feeling that they were irresponsible and obdurate. They were also trying to mislead and distract the Health Panel Members from the key problems and the possible damage to the public if continue to allow the medical practitioners to **personal supervise any person** (who can be a layman) to handle irradiating apparatus **unconditionally**. H&WB and the Radiation Board officials repeatedly emphasized on the importance of maintaining the flexibility in Regulation 26(1) to satisfy the need in the process of medical treatment. But they could never give any evident or occasion to support how and why the “flexibility” is needed. Our Association insists that the so-called “**flexibility**” is **unnecessary and misleading because all the situations to use irradiating apparatus in the course of medical treatment can be anticipated and planned**. Furthermore, the kind of flexibility as suggested by the H&WB and the Radiation Board may lead to uncontrolled and may be abused.

Our Association would like to stress that Regulation 26(1) of Radiation (Control of Irradiating Apparatus) Regulation has to be amended so as to meet the present situation and to protect the public interest. **If keep on allowing unqualified people to handle irradiating apparatus, the practice and standard of radiographic and radiotherapeutic services will be remained uncontrolled** (public interest affected). Furthermore, **disciplined radiographers can make use of the loophole in Regulation 26(1) to handle irradiating apparatus** (practice in radiography).

As the issue as been dragged on for many many years, so we hope that the Health

Panel can act as the surveillant to ensure that the government administration would take the appropriate action to amend the Regulation as soon as possible.

Yours sincerely,

(Chan Wing Chung)  
for Chairman, Hong Kong Radiographers Association

c.c. Secretary, H&WB

Dr E.K. Yeoh  
Secretary  
Health & Welfare Bureau  
Central Government Offices  
Central.

Dear Dr Yeoh,

Further to the LegCo Health Panel meeting in 13 December 1999, in related to the amendment of Regulation 26(1) of Radiation (Control of Irradiating Apparatus) Regulation as raised by our Association.

In the meeting, arguments given by the Health and Welfare Bureau (H&WB) and the Radiation Board for supporting their “no necessary to amend Regulation 26(1)” was considered as insensible. H&WB and Radiation Board officials repeatedly emphasized on the importance of retaining **flexibility** in the present version of Regulation 26(1) (one of the options to maximize the “flexibility” is not to have any professional registration to radiographers). But those used to work in the health care system (just like you and me) must understand that the **so-called “flexibility”** is refutable. It is because all the situations to use irradiating apparatus in the course of medical treatment can be anticipated and planned. Furthermore the present version of Regulation 26(1) would only foster abusing the irradiating apparatus usage.

You must be aware that to protect the public interest the LegCo have already urged the H&WB to take appropriate actions (including **consult the relevant professional bodies**) as soon as possible to amend Regulation 26(1). As a responsible professional body, our Association would be obliged to offer opinions to the H&WB for this purpose. Please contact the undersigned or our Chairman.

Yours sincerely,

(Chan Wing Chung)  
for Chairman, Hong Kong Radiographers Association

c.c. Chairman and Members, Health Panel, LegCo.