



香港牙醫學會(有限公司)

Hong Kong Dental Association (Ltd.)

Disposal of Clinical Waste:**A Submission from the Hong Kong Dental Association**

The Hong Kong Dental Association (HKDA), being the representative of the Hong Kong dental profession, supports the Government's initiative to control the disposal of clinical wastes. As accountable healthcare professionals, we deeply share your concern on safeguarding the public and environment against the potential danger of clinical wastes. As a matter of fact, many of our members have been practicing proper disposal of clinical wastes as part of their infection control protocol. Your document has clarified and uniformed the practice.

In response to the Proposed Clinical Waste Control Scheme Consultation Document, we have the following recommendations and comments in different aspects.

Setting of New Regulation and Code of Practice:

- We welcome the proposal of setting a new regulation to control the collection, transport and disposal of clinical waste.
- We support the establishment of Code of Practice to provide guidance on the proper management of clinical waste.



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HKDA's Views:

- The HKDA agrees to the classification and definition of clinical waste as stipulated by the Environmental Protection Department.
- The HKDA agrees that clinical waste should be properly packaged and labelled.
- The HKDA agrees that safe and secure temporary storage facility should be provided to store the clinical waste pending transportation to final disposal.
- The HKDA agrees that clinical staff should take all necessary safety measures in handling clinical waste.
- The HKDA does NOT agree that clinics should keep records of clinical waste collection and produce the record of trip tickets for inspection upon requests by the Director of Environment Protection Department.
- The HKDA does NOT agree that it would be an offense with punishment of imprisonment for those who fail to arrange their clinical waste to be delivered to a licensed disposal facility.
- The HKDA agrees that the costs of waste collection should be monitored. The fees charged should be reasonable for the dental practitioner and the collector.