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HONG KONG DOCTORS UNION
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Our ref.: HKDU/004/2010

11th January, 2010

By fax and mail

Dr. Joseph Lee Kok Long
Chairman
Panel on Health Services
Legislative Council
Legislative Council Building
8 Jackson Road
Central, Hong Kong

Dear Dr. Lee,

Re: Strong Objection to require all orders for drugs to have written records

We refer to paragraphs 5.67-5.73 of the report of the Review Committee on Regulation of Pharmaceutical Products in Hong Kong. (Please see Appendix A for copy of the extract)

Hong Kong Doctors Union members are as keen as the government and more concerned about the safety of drugs dispensing than any other organization. We have publicly called for the more stringent examination of prescribed drugs not only in our bulletins but also in our drug safety surveys and our submissions to the concerned government departments. However doctors have unanimously shown strong objection to written order requirement in our written and verbal surveys since 2007. (Please see Appendix B for copies of survey result) Verbal orders for drugs have worked efficiently for years and safety was rarely sacrificed since doctors insisted on stringent check of drug labels. Sending written orders for drugs creates uncertainties and fuss and not ensures the right drugs delivered to patients.

We know of the jerk reaction several years back of one leader of another medical organization in advocating written orders with the ordering of drugs as a mean of preventing the wrong drugs being dispensed. We have explained in details how the clinic doctor is like the chef in the kitchen. To ensure the correct foods go to the client, he must treble check the outgoing foods and not just ensure the kitchen receive the correctly ordered ingredients. Therefore requiring the chef to order pork in writing only creates unnecessary fuss and false security, which is dangerous.

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As a counter proposal, besides requiring doctors to double check on the drugs received, we propose to extend poison forms to cover non-poison drugs as well and thus doctors need to countersign poison forms for all drugs.

Thank you for your kind attention.

Yours truly,

Dr. Ho Ock Ling
Hon. Secretary
Hong Kong Doctors Union

Encl.

c.c. Dr. Hon. Leung Ka Lau
Mr. Hon. Leong Ka Kit
Mr. Hon. Li Wah Ming
Members of Panel on Health Services

5.67 The Review Committee notes that there is at present no requirement for ASPs or LSPs to place orders for drugs in writing only. The same also applies to private doctors, even though it is stated as a recommended practice in the "Good Dispensing Practice Manual" published by the Hong Kong Medical Association.

5.68 The Review Committee agrees that written drug orders serve two major purposes. First, it contributes to building up a complete set of record in the drug supply chain all the way from the primary source to the patients. It thus facilitates the tracing of source of drugs in the event of drug recall. It also deters the sale of unregistered drugs and purchase of drugs from unregistered traders as these unlawful acts do not have the support of written orders.

5.69 Second, it facilitates ASPs, LSPs and private doctors to verify if the drugs delivered are actually the drugs ordered. Since there is always a time gap between the ordering and delivery of drugs, a written drug order can assist the receiving staff, who may not be the ordering staff, to verify if the correct drugs are delivered. Furthermore, verbal order for drugs is prone to errors, as many drug names are similar and misunderstanding will easily arise.

5.70 The Review Committee acknowledges the concerns and difficulties of ASPs and some private doctors in complying with the written drug order requirement. In particular, for ASPs who may have to place over 100 drug orders daily, the amount of manpower and efforts involved may be quite significant, while many ASPs only have a few staff members and a limited storage area for the written records.

5.71 The Review Committee considers that protection of public health is of the top priority. Placing drug orders in writing contributes to building up a complete set of drug movement record, reducing errors in drug delivery and receipt, and combating illegal sale of drugs. The Review Committee also considers that ASPs and private doctors should not have great difficulties to comply with the requirement. The Review Committee suggests manufacturers and wholesalers design a standard procurement form for use by their clients in order to save their efforts. In fact, many advanced countries, for example in Europe, are already following this practice which has proved to be very convenient and easy to use.

5.72 In the light of the above considerations, the Review Committee recommends that all orders for drugs should have written records. DH should include this requirement in the licensing conditions for ASPs and LSPs, and in parallel, add in the licensing conditions of manufacturers and wholesalers that they can only supply drugs to ASPs, LSPs and private doctors with the support of written orders. The Review Committee is also pleased to note that the Hong Kong Medical Association and the Pharmaceutical Distributors Association of Hong Kong are supportive of this recommendation. Furthermore, it is noted that the written order practice is already recommended in the "Good Dispensing Practice Manual" issued by the Hong Kong Medical Association which should be observed by all doctors as advised by the Hong Kong Medical Council.

5.73 The Review Committee notes the objection of Hong Kong Doctors Union to the mandatory requirement of written order for drugs which is only supported by one other member. The rest of the other members support this recommendation.

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Appendix B (1/2)

5.7.2007

Result of Survey on The Hong Kong Medical Association's Good Dispensing Practice Manual
香港醫學會之「良好配藥操作手冊」調查問卷

In order to collect the opinions from members on the captioned, Hong Kong Doctors Union sent a questionnaire to 1,714 members on 8.6.2007.

As at 5.7.2007, 149 members (11.50%) returned the questionnaire to HKDU. The results of survey are:-

No. 編號	Question 問題	Yes 贊同	No 不贊同	No Answer 沒有回答	Total 合共
1.	Do you agree that the ordering of drugs from suppliers **should be** made in writing? 您是否贊同訂藥時**必需**要以「白紙黑字」方式通知供應商？	4 (2.69%)	**144** **(96.64%)**	1 (0.67%)	149 (100%)
2.	Do you agree that all medicines (not only external-use ones) **should be** stored in the suppliers' original containers? 您是否贊同所有藥物（不單指外用藥）**必需**貯存在供應商提供的容器內？	16 (10.74%)	**133** **(89.26%)**	0 (0%)	149 (100%)
3.	Do you agree that the mixing of different liquid medicines **should be** avoided in private clinics? 您是否贊同私家診所**必需要**儘量避免混合不同種類的藥水？	49 (32.89%)	**99** **(66.44%)**	1 (0.67%)	149 (100%)
4.	Do you agree that diluting of liquid medicines **should be** avoided in private clinics? 您是否贊同私家診所**必需要**儘量避免稀釋藥水？	32 (21.48%)	**117** **(78.52%)**	0 (0%)	149 (100%)
5.	Do you agree that for the pre-pack medications, it is recommended to mark the expiry date and lot number on the bottle in addition to the name of the drug (For ease of tracing if dispensing error occur)? 您是否贊同由診所預先包裝的藥品，其藥樽上，除列明藥名外，應寫明到期日和診所批號（若配錯藥時、可方便政府追查）？	33 (22.15%)	**114** **(76.51%)**	2 (1.34%)	149 (100%)

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2.12.2009

Survey on "to require retailers and doctors to have written records for drug orders"
「醫生須保存訂購藥物的書面記錄」的調查問卷

In order to collect the opinions from members on the captioned, Hong Kong Doctors Union sent a questionnaire to 1,661 members on 9.11.2009.

As at 2.12.2009, 151 members (9.09%) returned the questionnaire to HKDU. The results of survey are:-

為了收集會員對「要求零售商和醫生保存訂購藥物的書面記錄」的意見，本會於 2009 年 11 月 9 日向 1,661 名會員發出問卷調查。

直至 2009 年 12 月 2 日，本會收到 151 名會員(9.09%)之回覆。以下是問卷調查的結果：

No. 編號	Question 問題	Yes 同意	No 不同意	Abstain 無意見	No Answer 無回答	Total 合共
1.	Do you agree with the Government to require retailers and doctors to have written records for drug orders? 您是否同意政府要求零售商和醫生保存訂購藥物的書面記錄？	0 (0%)	151 (100%)	0 (0%)	0 (0%)	151 (100%)
2.	Do you agree with our counter proposal to require doctors to countersign on specified forms for all drugs received in the clinic (whether poison or non-poison)? 您是否同意我會的反建議要求當訂購的藥物(無論毒藥與否)送抵診所時，醫生確認及簽署在指定表格上？	110 (72.85%)	25 (16.56%)	14 (9.27%)	2 (1.32%)	151 (100%)

3. Further opinions 其他意見：

1) 根據稅務條例，醫生已經要保存至少七年的藥物訂購收條(要顯示出何種藥物及價錢)，每年會計師亦會要求有該年度的藥物訂購收條，其實已經足夠。

2) 周街可以買到的藥，還要白紙黑字訂購嗎?

3) 現時 poison drug，已必須醫生簽署 poison form。因何藥物，如有醫生 chop 及 clinic assistant 簽署(有些時藥物送來時，醫生未返)，均是由醫生最終負責。何須再加添醫生一些無謂的文件工作，因而影响了醫生更重要的為病人治療工作。

(Original Script from members)