

CPHP

College of Primary Healthcare Pharmacists

供各委員傳閱

Pharmacy and Poisons (Amendment) Bill 2014 Committee

Legislative Council, Hong Kong

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8th June, 2014

Dear President, Legco Members Dr KO,

On behalf of the College of Primary Healthcare Pharmacists, please find our submission for your review.

The College of Primary Healthcare Pharmacists is a professional body consisting of advanced practice and specialist practice pharmacists practicing providing primary healthcare services in HK. We were founded in 2009 and has been providing value added services to patients to prevent and manage their long term diseases as an important component of the primary healthcare team.

We believe the Pharmacy and Poisons Amendment Bill 2014 has issues that need to be thoroughly discussed.

First of all, the new power to be given to the Pharmacy and Poisons Board is too powerful in that it may place the members of the Pharmacy and Poisons Board in a difficult position and be in conflict of interest situations.

The Pharmacy and Poisons Board would become a government-led body which can single-handedly issue, revise, and enforce the Codes of Practice without any oversight by others. There is no mechanism to object to the Board and there is no accountability for being a member of the Board.

The composition of the Board is in lack of appropriate representation. Many important stakeholders are not included in the 11 representatives of the Board to speak the voice of

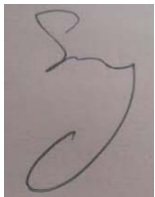
the stakeholders such as the Society of Hospital Pharmacists and The Practising Pharmacists Association are also not on the Board.

Another amendment is to remove the need for pharmacists to be the only person who can assume the Authorized Person position. We believe that the Authorized Person is a very important key personnel of the drug manufacturer. In many countries, it is required for pharmacists to be the AP. Professionals and patients are in safe hands with a professional pharmacist to act as a gatekeeper of quality. Hong Kong is not ready for the removal of the requirement as our local manufacturing sector has yet to be able to demonstrate ability to ensure for quality of drugs by being approved by the European Union as being able to meet the required standards. The law can be changed a later time but it is not the right time to change the law before the standards required are actually met.

Also, the definition of ASP is unclear to confuse whether the ASP is a business as in the original existing law or a person or sometimes both. This lack of clear roles and responsibility between the owners of the business and employee pharmacists must be clarified before the law can be changed.

We would suggest to have the Bill withdrawn to start from the beginning to discuss key issues with stakeholders before the process of law change is put forward.

Yours truly,

A square box containing a handwritten signature in dark ink. The signature is stylized and appears to be 'Dick Sung'.

Dick Sung
Public Affairs Manager
College of Primary Healthcare Pharmacists