



8th Oct 2017

Comments on the Private Healthcare Facilities Bill 2017 by
The Society of Hospital Pharmacists of Hong Kong

The Society of Hospital Pharmacists of Hong Kong **supports** the Private Healthcare Facilities Bill and its implementation as soon as possible. The following comments are made for the Legislative Council and regulatory body consideration.

1. Private Healthcare Facilities Setting and Drugs Storage

It is important for private clinics and private hospitals to comply with the requirements for storage of the drugs requiring stringent cold chain management, e.g. Vaccines. The use of purpose-built vaccine refrigerators (PBVR) or pharmaceutical refrigerators with temperature loggers is highly recommended by local professional bodies and most of the international regulatory bodies. As the efficacy of vaccine is adversely affected by the out-ranged temperature and the protection of vaccine cannot be ensured, it is utmost important to recommend the private clinics and private hospitals to install the PBVR or pharmaceutical refrigerators rather than allowing the service providers to use domestic refrigerators with plastic water bottles or containers to maintain the temperature stability. In fact, the use of plastic water bottles or containers is suggested for Third world countries where financial implication and proper health service facilities is a big concerned. For the benefit of the general public relying on long term health protection, the proper and reliable cold chain management should not be comprised because of the minority interest.

2. Private Healthcare Facilities Chemical Wastes Disposal

The expired and unused drugs should be disposed according to the Chemical Wastes Ordinance required by the Environmental Protection Department. It is a legal requirement. The professional guidelines should not supersede the legal requirements.



3. Private Healthcare Facilities Price Transparency

The Society of Hospital Pharmacists of Hong Kong (SHPHK) fully supports the increase in the transparency of price charged by the private healthcare facilities. The SHPHK suggests the requirement should also extend to the private medical and dental clinics as earliest as possible in order to protect the patient right and increase healthy competition. In long run, it can facilitate lowering of total healthcare cost. Besides the price list of standard surgical and medical procedures should be clearly disclosed, the price list of expensive drugs and drugs for treatment of chronic diseases, especially the cancer drugs, biologics, immunosuppressants, should be required to disclose in order to protect the consumers right and to prevent overcharge and the abuse of medical insurance. This price transparency approach for selling medications is highly adopted by all Western and Asian countries with medical insurance introduced in the healthcare system.

4. Committee on Complaints against Private Healthcare Facilities

Finally, The Society of Hospital Pharmacists of Hong Kong is interested to join the future Committee on Complaints against Private Healthcare Facilities and offer our expert and neutral advices on the issues of clinical treatment and drug charging, etc..

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