

Room 901, Hang Shing Bldg., 363-373 Nathan Road, Kowloon.
Email: hkdu@hkdu.org Home page: <http://www.hkdu.org>
Tel. No.: 2388 2728 Fax: 2385 5275

Our ref.: HKDU/017/2017

10th February 2017

By fax and mail

Prof Hon Joseph LEE Kok-long, SBS, JP
Chairman
Panel of Health Services

Dear , Prof. Lee,

Ref: Hong Kong Doctors Union Submission
on Proposed Regulatory Framework for Medical Devices

Hong Kong Doctors Union (HKDU) is the unique trade union with doctor members in both public and private services. Registered with the Trade Union Registry to look after the interests and rights of doctors in their employer employee relationship, HKDU is committed to upgrade the standard of medical doctors to cater for the health of the Hong Kong community.

HKDU welcomes the much awaited “Proposed regulatory framework for medical devices” to be discussed at the special meeting held by the Legislative Council Panel on Health Services on 13 February 2017.

Our comments on the captioned are as follows:

The Consumer Council in the past two years received more than one thousand complaints from the public about cosmetic procedures; in most of cases doctors were not involved.

HKDU shares and supports all the objectives of the proposed framework which include protecting public health, preventing avoidable adverse events and complications arising from risky procedures performed by incompetent operators, etc. The safety of patients or clients is our main concern and always at the top of the priorities.

In general we support the Government’s Proposal on the 2-level restriction for specific medical devices used for non-medical purposes. However, we hope the government can clearly define (i) the classification of medical devices according to risk level, (ii) risk levels for different procedures, and (iii) the qualifications and training required for the operators performing various procedures. We insist that high-risk and invasive procedures can only be performed by registered doctors. We firmly believe that only doctors are professionals trained to do proper medical assessments of the problems, make the accurate diagnoses, formulate comprehensive treatment plans and explain to the clients the benefits and possible complications of the procedures. However, we are in favour of



Room 901, Hang Shing Bldg., 363-373 Nathan Road, Kowloon.

Email: hkdu@hkdu.org Home page: <http://www.hkdu.org>

Tel. No.: **2388 2728** Fax: **2385 5275**

training non-medical personnel to use medical devices for performing mild to moderate risk procedures under the supervision of a registered medical doctor.

We support the setting up of the public registry of recognized training programmes. The contents of the programmes, source of the teaching staff, the examination systems and the eligibility to perform what types of procedures upon qualification should be precisely formulated. Training and revision courses should be regularly updated and easily available.

The whole system should have a specific name e.g. “Medical Devices Regulatory Committee” to be headed by staff designated by the Secretary for Food and Health and should have close liaison with the HK Medical Council, medical and healthcare associations, academic institutions and related trade associations through a statutory Advisory Panel.

We appreciate and commend the hard effort of the Food and Health Bureau expediting this framework for the welfare of the public against further serious adverse events related to uncontrolled use of medical devices.

Yours sincerely,

Dr. Chan Pui Kwong
Hon. Secretary
Hong Kong Doctors Union

Encl.

cc: Dr. Ko Wing-Man, Secretary for Food and Health
Dr. CHAN Hon-Yee, Constance, Director of Health
Dr. Hon. Pierre Chan, Legislative Councillor
Media

Outgoing 15