

致 法案委員會及主席:

香港眼科視光師學會(學會) 就《2025 年輔助醫療業(修訂)條例草案》法案委員會會議(議程:2025 年 4 月 22 日),提交修訂的意見摘要如下:

1. 長期忽視視光師於基層醫療的角色

《輔助醫療業條例》對視光師的法定定義自 1985 年沿用至今,僅限於「測試視力; 配處視光用具;裝配視光用具或供應視光用具」,完全未反映業界多年來臨床實務的全面職能。儘管過去三十年間本學會多次提交改革倡議(見下表),當局始終未與國際標準接軌。

1985年立法局會議紀錄明確指出:

「此定義並非窮舉視光師的所有職責,亦不阻止其執行附加職能(如發現眼疾)。」(翻譯)

原文:

"The purpose of the definition is to describe the work of the optometry profession insufficiently broad terms to ensure that it embraces all those engaged in optical work who ought to be registered. This definition does not purport to describe all the work an optometrist may do, but at the same time it does not prevent him from performing additional functions, such as the detection of ocular diseases. By the same token, restrictions may be imposed, through regulations, on the type of work which can be undertaken by different categories of optometrists."

(衛生福利司,1985年8月7日立法局會議紀錄)

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Year	Purpose	Reference
1991	A submission to the working party on primary health care	CB(2)2414/98-
		99(03)
1999	Advocate for integrating optometrist into the health care	CB(2)2395/98-
	system of many industrialized countries.	99(02)
2000	Advocate for integrating optometrist into health care system:	CB(2)2567/99-
	Patient referrals by optometrists to Hospital Authority specialist	00
	clinics	
2008	In Response to the Health Care Reform Consultation Document:	https://www.
	Your Health Your Life	healthbureau.
	 Promote the need of regular eye check for the public, 	gov.hk/beStro
	especially for the high risk group; e.g., diabetics (10% of the	ng/files/organi
	HK population has diabetes)	zations/0096.
	 Place optometrist on the first point of contact for eye 	pdf
	patient	
	Utilize the full competency of the optometrist	
	Have referrals by the optometrist accepted by the Hospital	
	Authority	
2008	Expresses strong dissatisfaction that the Administration have	CB(2)2799/07-
	neglected the role of optometrists in enhancing primary care.	08
	Optometrists have been trained to provide a wide range of	
	professional eye care services. Apart from sight testing, they can	
	play a vital part in detecting eye diseases and visual problems	
2018	We met with representatives from the Food and Health Bureau	
	to express our interest in joining the Primary Care Directory. In	
	response, the Bureau indicated that an amendment of SMPC	
	was planned and that a consultation would be conducted to	
	address this matter.	
2020	Policy address: Advocate for expanding optometrist scope	
	practice and actively involved in children's short-sightedness	
	control measure.	
2024	Policy address: Advocate for expanding the role and scope of	
	practice of optometrists (Part 1) in primary healthcare.	



然而,歷屆政府從未落實修訂。**2017** 年基層醫療發展督導委員會更排除眼科視光界代表,忽略了:

- I. 視光師在視力保健的貢獻性及眼睛健康對基層(預防)醫療的重要性
- II. 視光師對青光眼、眼睛退化性改變的早期篩查能力
- Ⅲ. 本港眼科視光學及臨床科研與國際標準接軌的事實

本學會現提務實修訂建議:

於附表新增「(e) 檢查眼睛以發現視力障礙、受傷跡象和眼部疾病以及 其他與眼睛相關的疾病。」

此修訂僅將現行實務明文規範,促請當局:

- I. 就反對建議提供實質理據,或
- II. 承諾制定視光師職能改革時間表

2. 新增「第五及第六部」註冊類別恐釀漏洞

本學會明白及理解為新增專職醫療專業「有限註冊」及「臨時註冊」 的原意。但由於歷史原因,現行條例對視光師的定義仍是「斬件 式」,有別於物理治療師等專業的清晰定義。若再引入「有限註冊」 及「臨時註冊」,將加劇以下問題:

- I. 註冊架構複雜化:「正式」、「臨時」、「暫時」「有限度」 多重資格並存,易致公眾混淆
- II. 專業分化風險,恐損害專業認受性

當局聲稱修訂為應對「公營部門人力需求」,卻未正視各輔助醫療專業的獨特性,如本港逾八成視光師任職私營機構,公營短缺不能一概而論。更令業界擔心的是,根據新修訂條文,執業者完全可合法地以「暫時」或「有限度」身份成為「臨時註冊」視光師執行基本驗光功能。此漏洞將嚴重損害專業認受性,直接違背當初立法原意中「維持最高專業標準」的核心精神。本學會促請審慎考慮審視條文,避免「一刀切」立法。

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3. 「專職醫療專業」英譯不能反映「專職」

我們非常歡迎局方擬將「輔助醫療業」正名為「專職醫療專業」,唯 英文翻譯 "Supplementary Medical Professions" 更名為 "Allied Health Professions",本學會認為「Allied Health」未能反映中文原意:

- I. 詞義偏差:「Allied」(協作)難解作專職的專業自主性,易被 曲解為「協作角色」。
- II. 忽略學歷要求:本港專職醫療人員均需持學位資歷,具獨立判斷及制定治療方案能力。

本學會建議採用直譯 "Specialized Health Professions" ,以準確彰顯:

- I. 專業學術資格
- Ⅱ. 臨床決策自主權
- III. 在醫療體系中的獨特定位

香港眼科視光師學會會長

陳文彬博士

2025年5月8日

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