



香港眼科醫學院

# 香港眼科醫學院 The College of Ophthalmologists of Hong Kong

(Incorporated in Hong Kong with limited liabilities)

a Constituent College of the Hong Kong Academy of Medicine

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黃詩詠律師8<sup>th</sup> May, 2025

Dr Hon David Lam Tzit-yuen

Chairman of the Bills Committee

Legislative Council

**RE : Supplementary Medical Professions ( Amendment ) Bill 2025**

On behalf of the College of Ophthalmologists of Hong Kong, we write to express our views on the proposed Bill amendment of Cap 359. We have strong reservation on the proposal by optometrists for the addition of a clause (e) to the Supplementary Medical Professions Ordinance ( Cap 359 ) which states “ examining eyes for detecting vision disorders, signs of injury and ocular diseases, and other eye related conditions.” In one of the Legco meetings held on 22nd April 2025, it was pointed out that proper consultation with different stakeholders and a thorough and detailed review should be done before any amendment made. As the statutory body for monitoring and assessment of ophthalmology training and ophthalmic care in Hong Kong, our primary duty is to “ protect patient safety and uphold the highest standards of eye care “ in Hong Kong, we therefore have deep concerns on the proposed expansion of the scope of practice of optometrists without appropriate regulatory safeguards. Objective assessment of both the curriculum and the standards of training of optometrists are fundamental prior to any changes. Detection of vision disorders requires many years of training, formal examination and clinical residency. Certain eye diseases are the indicators of more sinister systemic diseases such as ischemic heart diseases, cerebrovascular diseases, certain metastatic cancers, thyroid eye diseases or neurological diseases like multiple sclerosis which require the care of medical practitioners for proper assessment and management.

It is important to note that under Hong Kong’s “ Medical Registration Ordinance (Cap 161 Section 32.1 )

“no person unless he is a registered medical practitioner or is provisionally registered shall hold himself out as being qualified, competent or willing to undertake the treatment of diseases of the human eye or the prescription of remedies therefor, or the giving of advice in connexion with the treatment thereof.”

Primary care is an important aspect of the medical service to ensure our community is in good health. Primary eye care providers are important gatekeepers to safeguard the safety and well being of our society. Ophthalmologists are well trained as comprehensive eye care professionals and at the same time with a background training as medical doctors to take care of the patients as a whole. We have worked alongside general practitioners, family medicine practitioners and allied healthcare professionals to provide the highest standards of primary eye care to our community all through these years. As the team leaders, we always welcome and work closely with our allied health professionals such as optometrists, nurses,



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orthoptists and eye care assistants to provide a co-ordinated and comprehensive eye care to our patients. Optical assessment is one part of the primary care of patients. As what have been doing now, optometrists provide accurate refraction, spectacle prescriptions, contact lens fitting, performing ophthalmic investigations and low vision care to our patients.

In order to protect our patients and the community, our government has all along set up an excellent and robust system to ensure the standards of practice and patients' safety. There are continuous professional development and continuous medical education, straight liability and indemnity requirements for all medical practitioners to protect patients' welfare under the guidance of the Medical Council.

The College of Ophthalmologists pride ourselves as the guardian of the eye health for the people of Hong Kong. We welcome dialogue and are eager to work closely with the government and different stakeholders including colleagues in general practice and family medicine as well as allied healthcare professionals to develop an efficient and safe framework for primary eye care services in District Health Centres and the community that prioritizes patient welfare and safety. Hong Kong's world class healthcare system deserves nothing less.

Yours sincerely,

The College of Ophthalmologists of Hong Kong.

CC:

- Professor Chung-mau Lo, BBS, JP, Secretary for Health
- Hon CHAN Hoi-yan,
- Hon Judy CHAN Kapui, MH, JP
- Hon CHAN Pui-leung
- Prof Hon CHAN Wing-kwong
- Hon Tommy CHEUNG Yu-yan, GBM, GBS, JP
- Hon Adrian Pedro HO King-hong
- Revd Canon Hon Peter Douglas KOON Ho-ming, BBS, JP
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- Hon LAM So-wai
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- Hon Benson LUK Hon-man
- Hon TANG Fei, MH
- Hon TANG Ka-piu, BBS, JP
- Hon YUNG Hoi-yan, JP