



17th April 2025

Dr Hon David LAM Tzit-yuen
Chairman of the Bills Committee
Supplementary Medical Professions (Amendment) Bill 2025
Legislative Council

Dear Dr Lam,

RE: Appeal for Support in Accurately Defining Optometrists' Scope of Practice in Cap. 359

On behalf of the School of Optometry at The Hong Kong Polytechnic University (PolyU), I am writing to appeal for your support in accurately defining the scope of practice for optometrists in the forthcoming amendment to the Supplementary Medical Professions Ordinance (Cap. 359). It is essential that the definition reflects the comprehensive and evolving nature of optometric practice, ensuring that our profession is recognized for its vital contributions to primary healthcare.

The School of Optometry at PolyU is the sole provider of an Honours Undergraduate Programme in Optometry, as well as a Doctor of Optometry and Doctor of Health Sciences (Optometry) Programme in Hong Kong. We pride ourselves on providing rigorous education and clinical training that meets international standards. The curriculum equips graduates with the essential knowledge and practical skills necessary to deliver comprehensive eye care services. Graduates are eligible for full registration in Part I of the Register of the Optometrists Board of Hong Kong.

Our curriculum ([link](#)) encompasses several key areas, including:

- Ocular Anatomy and Physiology
- Ocular Pathology and Ocular Pharmacology
- Ocular Disease Management
- Geriatric and Vision Rehabilitation
- Paediatric and Vision Training
- Public Health Optometry
- Ophthalmic Optics and Dispensing

Our graduates emerge as highly competent primary eye care providers, trained to detect, diagnose, and manage a wide array of ocular conditions. Their expertise extends beyond basic refractive services to encompass screening for systemic health issues, early detection of ocular diseases, and active participation in preventive eye care initiatives, such as the Chronic Disease Co-Care Pilot Scheme (CDCC) and District Health Centres.

The Healthcare Reform Consultation Document published by the Food and Health Bureau in 2008 ([link](#)) explicitly describes optometrists as ***“Health professionals trained to provide comprehensive eye and vision care, such as eyesight correction and diagnosis of common conditions related to the eyes or vision. They are not medical doctors but may refer patients to an ophthalmologist (who is a medical doctor specializes in eye care) for treatment when needed”***. However, we find it concerning that the existing definition of “optometrist” in Cap. 359 does not adequately reflect the current scope of practice and the contributions of optometrists to society. The existing definition as stated in the Schedule of the Ordinance reads as follows:

“Optometrist: A person trained in the practice of—
(a) testing vision;
(b) prescribing optical appliances;
(c) fitting optical appliances; or
(d) supplying optical appliances on prescription.”

This definition fails to encompass the full scope of modern optometric practice and the essential role that optometrists play in comprehensive eye care. I firmly believe that the revised definition of “optometrist” in Cap. 359 should align with the established recognition in the 2008 Healthcare Reform Consultation Document, ensuring consistency with Hong Kong’s healthcare reform objectives. Such definition can be incorporated as item (e) in the Schedule.

I respectfully urge your support in advocating for the amendment of Cap. 359 to incorporate a modern, primary care-oriented definition of optometry. Your leadership in this matter is crucial for enabling optometrists to effectively serve the community and contribute meaningfully to the future of primary healthcare in Hong Kong. This amendment will align Hong Kong’s regulations with global optometric standards, reinforce the vital role of optometrists within the primary healthcare system, and enhance

public access to high-quality eye care services, ultimately ensuring more effective utilization of government resources in the long term.

Thank you for considering this important matter. I look forward to your positive response and the opportunity to collaborate on this vital reform.

Yours sincerely,



Prof. Kee Chea-su
Head & Professor, School of Optometry
K.B. Woo Family Professor in Optometry
The Hong Kong Polytechnic University

CC: Members of the Bills Committee on Supplementary Medical Professions (Amendment) Bill 2025:

- 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
- Hon Lillian KWOK Ling-lai
- Hon LAM So-wai
- Hon Edward LEUNG Hei
- Hon Benson LUK Hon-man
- Hon TANG Fei, MH
- Hon TANG Ka-piu, BBS, JP
- Hon YUNG Hoi-yan, JP