

From:

To: bc_54_13@legco.gov.hk

Date: Friday, July 11, 2014 02:04PM

Subject: 病人權益協會 藥物安全聯盟 讓各委員傳閱

Dear Honorary Legco Bills Comm Members,

Drug Safety Consortium is a patient group jointly founded by Patients, Drs and Pharmacists straightly after drug incidents happened in 2009.

Patients do have lots of concerns towards the Bill, take brief example,

"放寬藥產藥標準，香港藥物質數下降，我地病人第一個受影響。但政府竟然掉轉話安全左，試問轉左非藥劑師做負責人，點樣會安全左？"

"另外，衛生署講到明話藥劑製品係有確定療效，宜家改成不倫不類的定義，我地病人連什麼是藥，什麼是健康食品都分不清楚。

政府成日話安全左，你話比我聽有改例後有乜安全左？"

Below letter is written by Mr Kin Ping TSANG, a well known international patient group leader.

Thanks a lot for your kindest consideration and help. If you would like to meet up with Mr TSANG, please do not hesitate to contact us at

Cordially,
Drug Safety Consortium

11 July 2014

Dear Legco Members,

Re: Concerns of Patients, Doctors, and Pharmacists in the Drug Safety Consortium - Patients at Risk from Inappropriate Changes in Pharmacy Law

On behalf of the Drug Safety Consortium, a non-profit organization established in 2009 by patients, doctors, and pharmacists, to address the issues pertaining to medication safety, we would like to express our concerns on the recently proposals in the Pharmacy and Poisons Amendment Bill 2014.

As human health and safety is of the highest importance in every society, proposals to change the pharmacy laws in Hong Kong should be evaluated in a thorough and comprehensive manner. During the course of the past few Bills Committee Meeting, we have observed that the government has only been trying to rush through the process to get the Bill passed without thorough understanding of the issues and concerns raised by a huge number of professionals and patients. The public is at risk of having laws that does not enhance safety but lower the standards of safety in the current healthcare system.

The numerous letters from organizations with wide representation which raised concerns have been ignored and not tabled for discussion at the Bills Committee. It is inappropriate to continue to mislead Legco members with the opinions of the few individuals which blindly support the government and which may not comprehend the full implications of the Bill on medication safety.

Patients and healthcare professionals from USA , Malaysia, and around the world have attended to observe the Bills Committee recently and have found this unfair way to discuss the Bill proposals to be very unprofessional.

Please find the key points of our concerns attached for your reference and hope you can ensure that a fair process is provided to discuss the issues with the current Bill and in any case, the Bill should not be rushed to be approved if issues are not resolved. You will find that better and more thorough understanding of the implications of the Bill will result in best results to protect the public in the long term.

Tsang Kin-ping
Patient Group Leader
Drug Safety Consortium

《2014年藥劑業及毒藥(修訂)條例草案》

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| | 草案條目 | 業界要求需詳細討論及修改的條目 |
| 1 | 第2部 第4條. 修訂第 2條(釋義) | (1) 第2(1) 條， 獲授權毒藥銷售商的定義 |
| 2 | 第2部 第4條. 修訂第 2條(釋義) | (3) 第2(1) 條， 藥劑製品及藥物的定義 |
| 3 | 第2部 第4條. 修訂第 2條(釋義) | (6) 第2(1) 條
“ 《行為守則》(code of conduct) 指根據第 4B條發出的、不時根據該條修訂的《行為守則》；
《執業守則》(code of practice) 指根據第4B 條發出的、不時根據該條修訂的《執業守則》 |
| 3 | 第2部 第5條. 修訂第 3條 (藥劑業及毒藥管理局) | 6. 加入第 4B條
“4B. 《行為守則》 及 《執業守則》 ” |
| 3 | 第2部 第14條. 修訂第 15條(紀律委員會的委出) | 在第15(1A) 條之前——
加入
a) 管理局接到投訴，而投訴是關於某註冊藥劑師或某註冊藥劑師的僱員的行為操守，或管理局覺得，某註冊藥劑師已違反適用於該藥劑師的 《行為守則》 ； |
| 4 | 第2部 第30條. 加入第 34A條 | “34A. 追討收集或化驗毒藥或藥劑製品等的費用及開支 ” |
| 5 | 第3部 第52條. 加入第 30A至30F條 | 30C. 申請註冊為獲授權人
(ii) 持有在修畢委員會認可的課程後頒授的資格 ； |
| 6 | 第3部 第67條. 修訂附表5 (為本條例第 27(c)條的施行而根據本規例第15 條訂明的說明) | (4) 附表5——
加入
“12. 須加上標籤標明 “ Prescription Drug 處方藥物 ” 的字句——
含有附表 3所列毒藥的藥物
13. 須加上標籤標明 “ Drug under Supervised Sales 監督售賣藥物 ” 的字句 |
| 8 | 第59條 36B | Clinical trial certificate duration change from 2 to 5 years |
| 9 | RIA report | We urge government to disclose the RIA report |