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Hong Kong BRANCH



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Healthcare Planning and Development Office  
Food and Health Bureau  
19/F, East Wing  
Central Government Offices  
2 Tim Mei Avenue, Tamar  
Hong Kong  
E-mail: [hpdo@fhb.gov.hk](mailto:hpdo@fhb.gov.hk)

Dear Sir/ Madam,

**Re: Regulation of Private Healthcare Facilities**

On behalf of Institute of Biomedical Science (IBMS), Hong Kong Branch, I would like to submit our views on the captioned subject as below:

**1. Page 7 para7 (ii)**

We concurred that it is necessary to regulate cell, tissues and health products (e.g. stem cell preparation) for advanced therapies. Stem cell preparation shall be performed by registered Medical Laboratory Technologists (MLT) who are regulated under the existing Supplementary Medical Professional Ordinance (SMPO) (Cap. 359). Moreover, the facilities/ premises where the processing of stem cells are carried out shall be regulated through a comprehensive set of regulatory control rather than relying solely on the ethic and self-discipline of registered MLT coupled with sanctions against those breaching professional conduct via the Medical Laboratory Technologist Board under the SMPO (Cap. 359). Under the Ordinance, the medical laboratory technology profession can only be practised by persons registered in respect of that profession. Any company carrying on the business of medical laboratory service is required to have at least one director who is a registered medical laboratory technologist. Any medical laboratory technologist who breaches

any condition of his registration may be subject to inquiries and liable to disciplinary actions, including receipt of warning letter and removal of his name from the register.

**2. Page 8 para 8 (c)**

The medical clinics operated by medical groups or individual (or jointly by several) medical practitioners, are currently not under direct statutory control beyond regulation of individuals' professional practice. Many of these clinics operated by medical groups have associated medical testing laboratories or imaging centres, these facilities shall also be suitably regulated in order to strengthen the whole healthcare infrastructure. Registered MLTs shall be employed in all medical premises where there is processing of specimens taken from the human body for medical diagnosis, prophylaxis or treatment.

Moreover, please clarify if the definition of private healthcare facilities (PHF) embraces private medical laboratories which provide essential information for medical diagnosis, prophylaxis or treatment.

**3. Page 15 para26 d(iii)**

Please clarify whether the Regulatory Authority have power to handle complaints lodged against other PHFs other than Private Hospitals.

Yours sincerely,

Ms. Leung Siu Mui  
Chairperson  
IBMS Hong Kong Branch