

9 July 2014

Prof. the Hon. Lee Kok Long, Joseph
Chairman, Bills Committee
Pharmacy and Poisons (Amendment) Bill 2014
Legislative Council Complex
1 Legislative Council Road
Central
Hong Kong

Dear Prof Lee,

Pharmacy and Poisons (Amendment) Bill 2014 – Written Order

The Hong Kong Association of the Pharmaceutical Industry (HKAPI), represents 40 international companies engaged in the R&D of pharmaceuticals as well as regional distributors that provide over 70% of the prescription medicines and distribute over 80% of imported pharmaceutical products in Hong Kong, supports the proposed amendment to the Code of Practice for Wholesale Poisons Licence holders where purchasers of pharmaceuticals need to provide a written order.

Patient and drug safety is always a prime concern of the pharmaceutical industry, we strongly believe that the implementation of this requirement will minimize errors arisen as a result of miscommunication when placing order verbally, enable the track and trace of pharmaceuticals and thus enhancing patient safety. This practice of providing a written order is also in line with the Good Distribution Practice developed under the WHO and European Commission and it has been incorporated in the Good Dispensing Practice Manual of the Hong Kong Medical Association since 2007.

In view of the benefits written order can bring to patients, members of the HKAPI who distribute more than 80% of drugs in Hong Kong are dedicated to enhance the workflow to cope with this requirement. With the wide availability of electronic means in placing written orders, they can be handled as efficiently as verbal orders

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and we do not foresee any problems that will cause undue delay in drug delivery. Instead, we believe it is a measure to enhance the efficiency of the ordering system and reduce the wastage caused by wrong orders as drugs are valuable resources for patient safety.

Yours sincerely,



Sabrina Chan

Executive Director