

Healthcare Planning and Development Office  
Food and Health Bureau

Dear Sir ,  
Regulation of Private Healthcare Facilities

Association of Doctors in Aesthetic Medicine ( Hong Kong ) Limited (ADAM) is a Medical Association with the largest number of member doctors actively practising Aesthetic Medicine in Hong Kong.

Association of Doctors in Aesthetic Medicine ( ADAM) support working group on Differentiation between Medical Procedures and Beauty Services (WG1) that certain cosmetic services should be performed by registered medical practitioners/ dentist because of the risks involved.

Consequently , Medical Beauty centres that perform these procedures : involving injection , mechanical/chemical exfoliation of skin below the epidermis , hyperbolic oxygen therapy and dental bleaching will be regulated as “ Private Healthcare Facilities “ .

ADAM support the plan to introduce a regulatory regime for the control of the use of specified high-risk medical devices through the new medical device Registration.

Please clarify the term “ tissue filler” on page 103 ( under 3 (e) )and give examples.

Since there is no recognised specialty of Aesthetic Medicine in Hong Kong Academy of Medicine (HKAM) , ADAM suggest that in the future deliberation of guideline & details to regulate Aesthetic Medicine , Director , Department of Health should consult the opinions from Medical Associations actually practising Aesthetic Medicine in Hong Kong .

Yours sincerely ,

Dr ALAN Fung Ho Wang  
Chairman

ASSOCIATION OF DOCTORS IN AESTHETIC MEDICINE  
( HONG KONG ) LIMITED

香港醫療美容醫生協會有限公司

食物及衛生局  
醫療規劃及發展統籌處

敬啟者

對私營醫療機構規管諮詢文件的意見

香港醫療美容醫生協會有限公司是由執行醫學美容程序的醫生所組成。本會是現時香港最大規模的有關組織。

對於私營醫療機構規管諮詢文件,本會支持工作小組區分醫療程序和一般美容服務,某些美容程序本身涉及風險,因此應由註冊醫生/牙醫施行。

本會支持某些醫學美容中心如執行相關程序包括涉及注射的程序、以機械或化學方法在表皮層以下進行皮膚剝脫、高壓氧氣治療和漂牙,都以私營醫療機構規管。

本會支持工作小組的建議,設立一個規管制度,透過新的管制醫療儀器法例,規管指定高風險醫療儀器的使用。

另外,於諮詢文件(中文版)第八十七頁 3(e)中所指的組織填充劑定義含糊,請詳細說明及舉例。

由於香港醫學專科學院並沒有醫學美容的專科,本會建議衛生署署長對於醫學美容的立法與規管時應諮詢實際上執業醫療美容的香港醫學協會。

以上建議希望政府能施行,以提高醫學美容的質素。

馮浩泓醫生

香港醫療美容醫生協會有限公司主席

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