OPTOMETRISTS BOARD OF THE AUSTRALIAN CAPITAL TERRITORY

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Mr Tony Hinton
MRA Review
Productivity Commission
PO Box 80
Belconnen ACT 2616

Dear Mr Hinton,

Re: MRA and TTMR Arrangement Review

The Optometrists Board of the ACT, along with other state and territory Optometry Boards in Australia and New Zealand have been concerned with the effect of the operation of the above Acts. Our concerns are twofold:

- Under MRA and TTMR the "weakest link" in the registration process determines the level of practitioner competence which must then be accepted by all other states and territories.

- The New Zealand Government has been reluctant to remove the acceptibility of the "qualification" MBCO (Membership of the British College of Optometry) from its list of acceptable registrants, despite the fact that Members of this organisation may hold degrees or diplomas from institutions which are **not substantially equivalent** to the standards required of the accredited Australian and New Zealand training institutions.

Most of the state and territory Acts have been, or are being reviewed to ensure that practitioners meet recency and competency standards which are acceptable to the profession and ensure public protection. These standards are of course redundant under the MRA/TTMRA process when Boards are forced to register applicants without any flexibility to assess their suitability to practise.

Despite numerous submissions from the Council of Optometrist Registration Authorities (CORA), The Optometry Council (TOC) and the individual state and territory Boards to both AHMAC and the New Zealand Government, the latter have been reluctant to change their stance on the acceptability of the MBCO qualification. The registration boards have been left with no option but to request removal of the profession of optometry from the MRA/TTMR Agreements to avoid this undesirable situation continuing.

Your examination of this concern would be appreciated.

Yours sincerely,

Joanne Thomas
Chair
24 February 2003