OPTOMETRISTS REGISTRATION BOARD OF TASMANIA

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OBOARD:BOARD SUBMISSION TTMR MARCH 2003

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TTMRA Review
Productivity Commission
P O Box 80
Belconnen ACT 2616

Dear Sir/Madam

The application of the Trans Tasman Mutual Recognition Act 1998 to the registration of optometrists is of serious concern to the Optometrists Registration Board of Tasmania while there are differing standards for registration between Australia and New Zealand.

In 1995 the Council of Optometry Registering Authorities (the nine Australian and New Zealand Optometrist Registration Boards), with the support of the Optometrists Association of Australia, the New Zealand Association of Optometrists and the Australian and New Zealand Heads of Schools of Optometry established the Optometry Council of Australia and New Zealand. It was established primarily to achieve a uniform approach to registration of optometrists within Australia and between Australia and New Zealand.

To this end, the functions of the Optometry Council include:

- the evaluation and accreditation of Australian and New Zealand Optometry Courses (both undergraduate and post graduate);
- competency examinations for overseas qualified optometrists, for the purposes of assessing suitability for registration in Australia and New Zealand.

This system of uniform accreditation and assessment has been formalised in Section 19 of the Tasmanian Optometrists Registration Act which states that:

> *"A person may apply to the Board to be registered as an optometrist if he or she –*
> *(a) is a graduate of an institution accredited by the Council of Optometry Registration Authorities; or*
> *(b) has passed a qualifying examination held by the Council of Optometry Registration Authorities."*

All overseas qualified optometrists wishing to register in Australia are required to undertake a competency examination.

However, the New Zealand Optometrists and Dispensing Opticians Regulations 1977 allows automatic registration in New Zealand of optometrists who are members of the British College of Optometrists and whose membership was obtained after 1 July 1980 (MBCO). The Opticians Board of New Zealand has fought to exclude these optometrists from the list of qualifications which are recognised for registration in New Zealand but has overruled by the New Zealand Ministry of Health.

In the Annual Report of the New Zealand Opticians Board for the period 1 July 1999 to 31 March 2000, the Chairperson of the Opticians Board of New Zealand, Mr Hamish Caithness, stated:

> *"The Board has been pressing since 1997 for the removal of the Member of the British College (MBCO) and Member of the College (MCOptom) from the list of recognised qualifications in the Optometrists and Dispensing Opticians Regulations 1995, and is very concerned that the issue is still outstanding. The present situation requires the Board to accept lower standards of training for applicants who are registered as optometrists in the United Kingdom than it does for applicants from elsewhere (including applicants from Australia and New Zealand). In addition the Board has, on occasions, been forced to effectively delegate its registration function to the United Kingdom registration authority (the General Optical Council). Consequently, the Board does not currently have confidence in its registration procedures."*

Optometrists with the MBCO qualifications who wish to register in Tasmania, or in fact, any other Australian jurisdiction would be required to complete the competency examination held by the Optometry Council. However, many of these optometrists are now registering in New Zealand and transferring to Australia under the Trans Tasman Mutual Recognition Act to avoid the examination requirement.

Figures provided by the New South Wales Board of Optometrical Registration indicate that of 93 optometrists who have registered in New South Wales under Trans Tasman Mutual Recognition, 79 had been registered in New Zealand by virtue of either the MBCO or the MCOptom.

The Tasmanian Board is concerned that the effect of the Trans Tasman Mutual Recognition Act significantly undermines the efforts by the Australian Registration Boards to enforce standards of training for optometrists, and standards of eye care in Australia

It is concerned that the courses of study undertaken to achieve the MBCO qualification may be inferior to accredited Australian courses. In a report to the Council of Optometry Registering Authorities Prof Barry Cole stated that :

> "*the three year undergraduate course in the UK with its limited clinical instruction in the third year of course cannot attain the standard expected of Australian and New Zealand graduates at the end of their fourth year*".

He also notes that:

> "*the continued recognition of UK qualifications, which are arguably of a somewhat lesser standard than sustained in Australia and New Zealand, involves inequity and inconsistency because it fails to recognise the higher standards of optometric education and training in the United States and Canada"*

United States, Canadian and all other overseas qualified optometrists are required to sit the competency examination.

Overseas countries, including the United Kingdom, do not accept optometrists who have trained in Australia, without requiring them to undertake an examination conducted by the local Registering Authority.

While significantly differing standards for registration exist between Australian and New Zealand jurisdictions, optometry should be excluded from the provisions of the Trans Tasman Mutual Recognition Act in the same way as the medical profession has been excluded.

If you have any queries in relation to the matters contained in this submission, please do not hesitate to contact me.

Yours sincerely

JAYNE WILSON
Registrar