OPTOMETRISTS REGISTRATION BOARD OF VICTORIA

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MRA Review
Productivity Commission
P O Box 80
Belconnen ACT 2616

Dear Sir/Madam,

The Optometrists Registration Board of Victoria makes the following submission to the review of MRA and TTMRA.

1 Background

1.1 The Optometrists Registration Board of Victoria ("the Board") is a statutory body constituted under Victorian law with the primary task of protection of the public from unsafe practices by optometrists.

1.2 Representatives from the Board meet annually with representatives from all other Optometry Boards in Australia and New Zealand at the Conference of Optometry Registration of Australasia (**CORA**).

1.3 In the early to mid 1990's, officers from NOOSR met with CORA to encourage movement towards standardisation of optometry throughout the jurisdictions so that the Australian and New Zealand public could expect a similar standard of care no matter where they had their eyes examined.

1.4 Consequently, The Optometry Council of Australia and New Zealand (**TOCANZ**) was established by CORA with two functions: firstly to assess applicants from overseas to ensure standards of safe practice by these practitioners. TOCANZ therefore plays a quality assurance role on the practice of optometry throughout the two countries. TOCANZ is funded in principle by an annual per capita levy on all Australian and New Zealand optometrists as part of their registration fee. (There are some jurisdictions where this not possible due to particular legislation, but all jurisdictions supported the formation of TOCANZ for these purposes). TOCANZ is composed of Australian and New Zealand representatives of the Boards of Optometry, the professional Associations, and the Schools of Optometry.

1.5 The relevant optometrists registration act in New Zealand specifies the qualifications necessary to gain registration as an optometrist in that country. It includes a British qualification, the MBCO (Member of the British Council of Optometry), which is in fact not an academic qualification, but rather the membership of an organisation. In all Australian and New Zealand jurisdictions the MBCO is the only overseas "qualification" which is recognised for registration.

1.6 Once an optometrist with an MBCO gains registration in New Zealand, because of TTMRA and MRA it is possible for those holding an MBCO to gain automatic registration in Australian jurisdictions.

1.7 Because of the equivalent of mutual recognition within the European Economic Community, it is possible for optometrists from European countries to gain an automatic MBCO if they seek registration in Britain.

2. Broad Objectives of MRA and TTMRA

2.1 *Have the MRA and TTMRA been successful in addressing the obstacles to labour mobility?* There are now no obstacles within Australia and New Zealand jurisdictions to the registration of optometrists in other jurisdictions. Registration is an automated procedure within all Boards.

2.2 *What have been the major benefits and major costs? What has been the net impact?* The major beneficiary is the optometrist seeking registration by mutual recognition in that there is less paperwork for an initial registration. Board costs are reduced in the actual registration process because the checks required have already been carried out by another registration authority. These savings are far outweighed by the per capita levy required for the running of. TOCANZ. However, it is likely that even without the NOOSR initiative TOCANZ would have been established resulting in the same cost.

2.3 *What are the impediments to, and how significant would the benefits be, from greater harmonisation?*
Having TOCANZ accredit the schools of optometry means that Boards can have greater confidence in the safety of optometrists from other jurisdictions.

2.4 *Have there been any unwanted effects? If so, how can they be best addressed?* This Board, along with all other Boards of Optometry in Australia and New Zealand, has a major concern with the loophole which exists regarding registration of those optometrists with an MBCO (see 1.5 and 1.6).While the Board has the confidence of TOCANZ in harmonising the teaching of optometry in Australia and New Zealand, it does not have any assurance that those optometrists with an MBCO practice to the same standard as optometrists trained in Australia and New Zealand. This Board has no intimate knowledge of the standard of teaching within Britain, and is not willing to partake of the cost of accrediting the many optometry schools within Britain, to establish the safety of these optometrists to diagnose sight-threatening eye disease and to practise to the standard that the public of Australia and New Zealand have come to expect of its own optometrists. The optometry courses in Britain are one year less than in Australia which suggests that the standard could be lower. There are grave fears that the lesser standard of training in the rest of Europe, as acknowledged by British academics and professional associations, will lead to lesser qualified optometrists gaining registration in Britain because of the EEC mutual recognition. These European optometrists, who automatically gain an MBCO without examination, would therefore be able to register as an optometrist in New Zealand and subsequently, via TTMRA, within Australia. This Board already has a concern about the unknown ability of British trained MBCO's practising in this State, and has greater concern about the ability and safety of European trained MBCO's.

It would seem that the following are two possibilities of resolving this Board's difficulties with the MBCO issue:

i.) to ensure the protection of the Australian public, exempt optometry from TTMRA. This Board sees no disadvantages to MRA on this issue.

ii) TTMRA should apply only to optometrists who have an Australian or New Zealand qualification. To this Board's understanding, this would be entirely in the spirit of TTMRA. All overseas optometrist would therefore be required to undergo the TOCANZ competency-based examination which has been approved by all the Boards. This examination is pitched at entry-level into the profession

and is equivalent to the standard required of all Australian and New Zealand trained optometrists. Therefore this assessment is not discriminatory.

3. Implementation Issues

3.1 *How efficient has the administration of the MRA and TTMRA been and has there been any ongoing implementation issues which have detracted from the arrangements?*
This Board has no difficulties with administration and implementation of mutual recognition.

3.2 *How significant are administrative and compliance costs?*
Insignificant.

3.3 *Are existing dispute resolution mechanisms effective? What improvements, if any, are warranted?*
This Board has found it very frustrating that the MBCO loophole has not been able to be addressed satisfactorily by AHMC and AHMAC. There is an obvious difficulty when one party becomes intransigent and there would appear to be a case for an independent body to be set up to address issues in dispute and being given the ability to make a binding judgement.

4. Exemptions and Exclusions to Mutual Recognition.

4.1 *Are the present exemptions and exclusions consistent with the objectives of the MRA and TTMRA arrangements? What, if any, amendments to the existing Schedules are appropriate?*
See 2.4.

5. Scope of Mutual Recognition

5.1 *Are there grounds for broadening the scope of the MRA and TTMRA to cover any of the areas referred to in the above.*
Both MRA and TTMRA fully cover the situation of registration of optometrists between jurisdictions.

Details of TTMRA registrations in Victoria were provided to NOOSR in December 2002.

The Board thanks you that it has had the opportunity to be part of the review process. If any clarification is required concerning the issue of the New Zealand loophole regarding the MBCO qualification, the Board can be contacted via the above details.

Yours sincerely,

C K BEAMISH
Registrar