Our Ref: CJR.OPTOM:PRODUCTIVITY.doc

28 April, 2003

MRA Review
Productivity Commission
PO Box 80
BELCONNEN ACT 2616
Facsimile: (02) 6240 3311

Dear Sir / Madam

Further to your call for submission on Mutual Recognition dated 17 January 2003 the Optometrists Board in South Australia makes the following submissions:

1. our experience of the operation of the Trans Tasman Mutual Recognition Act (TTMRA) is good and meets its aim, namely, enabling the free movement between New Zealand and Australia of qualified optometrists;

2. the TTMRA allows persons to be registered in Australia who would not otherwise qualify for registration in any Australian jurisdiction. Consequently the TTMRA is open to exploitation and is used by some persons in a manner not envisaged by the TTMRA;

3. the dilemma for all Boards in Australia is that the TTMRA selects candidates with lower qualifications for registration than candidates applying for registration under the relevant local registration act. This may give rise to legal issues should local registrants conclude this practice is unfair. For example, membership of the UK College of Optometrists will enable registration under TTMRA but would not meet registration qualifications under the Optometrists Act (SA) 1920.

4. Given all of the above, the potential to reduce the quality of patient care is evident and requires management by registration boards which do not have large budgets. The alternative is to raise registration fees which imposes an impost on all practitioners.

Please do not hesitate to contact this office with any queries.

Yours faithfully
OPTOMETRISTS BOARD

NJ STORER
REGISTRAR