OPTOMETRISTS
ASSOCIATION AUSTRALIA

30 July 2003

Ms Sue Holmes
MRA
Productivity Commission
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Dear Ms Holmes

Optometrists Association welcomes the opportunity to comment on the Productivity Commission's draft research report, *Evaluation of the Mutual Recognition Schemes.* Our comments relate to the section headed " Jurisdiction shopping" (p76-78) and are restricted to optometry's experience with the Trans Tasman Mutual Recognition Arrangements (TTRMA). In other respects Optometrists Association Australia believes that the mutual recognition arrangements, as they relate to optometry, have benefited the community and simplified registration procedures.

There are two concerns that Optometrists Association has with jurisdiction shopping that the draft does not adequately address:

1. An unwise decision has affected all other jurisdictions. In registering professions Governments have a responsibility to ensure that practitioners achieve competency levels that ensure safe practice. All Australian and New Zealand graduates in optometry are required to show that they meet competency standards accepted in the two countries; all applicants for registration from other countries must demonstrate that they meet the same competency standards except British optometrists. New Zealand legislation makes an exception for them. There is no reason to exempt British optometrists from the requirements to meet the same public safety standards that all other optometrists must meet. Other jurisdictions are compelled to accept practitioners whose competence is uncertain because of the New Zealand legislation.

   The draft suggests that the main concern is that standards may be lowered. While that may be the case, Optometrists Association is more concerned that the British optometrists seeking registration in New Zealand are not required to show that they have achieved competency levels that ensure safe practice.

2. The New Zealand exemption for British optometrists is patently unfair. No one can understand why the British should be exempt from meeting the competency standards when local optometrists and optometrists from countries with higher standards of optometric education than the British must demonstrate competency. The apparent unfairness leads many to question of the integrity of the arrangements and undermines the TTRMA as a whole.

3. Until 2001, all Australian optometry courses were of 4 years duration while the British courses consisted of 3 years of undergraduate training with a pre registration year where the quality of the training varied with the location. From 2002 one of the Australian courses has been extended to 5 years of University training and the other two are likely to follow in the near future. This will exacerbate the apparent unfairness and even further undermine confidence in the TTMRA.

Preliminary Finding 5.7 (p78) is unlikely to help resolve the issue. The amount of consultation that has taken place is considerable and more is unlikely to help. All parties in New Zealand that have an interest (registration boards, educational institutions, professional associations, Australian Federal, State and Territory governments) other than the New Zealand Government have reached agreement that the New Zealand exemption for British optometrists be removed. The New Zealand Government remains unwilling to change its legislation.

The Association regards the TTRMA as they affect optometry as desirable but finds it difficult to accept this anomaly.

Several options could be considered to resolve problems such as those being experienced by optometry. Mutual recognition legislation might be amended to:

- apply only practitioners who have achieved their registration through qualifications gained in Australia or New Zealand or who have passed competency examinations recognised in all jurisdictions, or
- exclude specified professions when one jurisdiction is out of step with all others, or
- exclude jurisdiction from aspects of the mutual recognition arrangements when it is out of step with all others.

We would be pleased to elaborate on any of the points made.

Yours sincerely



JOE CHAKMAN
Executive Director