



Friday, 30<sup>th</sup> September 2011

Mr Colin Waldron,  
Chair Optometry Board of Australia  
[optomconsultation@ahpra.gov.au](mailto:optomconsultation@ahpra.gov.au).

Dear Mr Waldron,

### Consultation on Registration Standards in Australia

As the single largest employer of Optometrists within Australia, Luxottica would like to submit the following comments on the proposed registration standards being considered by the Optometry Board.

Apart from not seeking public discussion and direct consultation with some of the biggest groups representing optometrists, what is most disturbing about the Board's proposal and the current process is it appears to be self serving and driven by a minority group, not completely in the broad interests of the public's vision and health needs, discriminatory and anticompetitive. We question whether the same processes, practices and discriminations are being applied in other health care fields and their registration standards. Furthermore it appears that what is publicised in the public forum is quite different to what is talked about behind the scenes and in the optometric community. As a result of this, whilst in the past we have relied on trusted relationships and communication beyond the public forum, we can, unfortunately, no longer do so and need to more strongly and directly raise our concerns on behalf of our optometric community.

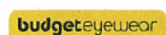
At Luxottica we believe everyone deserves access to quality eyecare. Luxottica supports it optometry CPD compliance through the Institute of Learning. IOL supplies CPD through :

- 70 seminars per year
- 40 online CPD courses
- 6 optometry magazines per year

IOL currently provides CPD services in Australia, New Zealand and Hong Kong. All CPD is independently assessed and approved by national optometry associations. IOL is one of the largest independent optometry CPD providers in Australia. In 2010 IOL supplied :

- 1,800 course completions
- 2,200 seminar attendances
- 20,000 OAA approved CPD points

Luxottica further supports the professional development of our optometrists by providing Optometry Professional Development (OPD) Awards. These cover the costs of optometrists upskilling and developing their professional skills and knowledge. During the period 2007-2010 we offered 40 OPD Awards (10 per year). The uptake of the OPD program has been so successful in 2011 we have increased the number of OPD Awards to 60 per year.



In the last 24 months we have invested over \$10 million in eyecare and technology with the introduction of Retinal Cameras across our entire OPSM network and the introduction of OCTs in select stores as examples. Our commitment and ambition is to provide access to world class eyecare to all Australians.

As you can see, Luxottica values both its optometrists and the role they play in providing eyecare to the people of Australia. Like the OAA, we believe that optometrists currently without the Ocular Therapeutics (OT) endorsement provide outstanding eyecare to their patients.

We believe that optometrists without OT endorsement should be entitled to continue to practise as they currently do, with a registration stating "not endorsed for ocular therapeutics".

We do not believe that currently registered optometrists should be forced to obtain OT endorsement. There should be no time limit set for obtaining endorsement.

We do not believe that overseas qualified, experienced optometrists should be required to obtain OT endorsement for general registration. They should be treated similarly to local experienced optometrists who do not have OT endorsement.

We believe by forcing local and international currently registered experienced optometrists to gain their OT qualifications as part of their future registration requirements will not serve the vision and health interests of our nation. In particular, our regional locations already suffer from a growing shortage of eyecare services, as highlighted in the 2006 Access Economics study:

(<http://www.deloitteaccesseconomics.com.au/publications+and+reports/browse+reports>).

The proposed registration requirements will exacerbate this in the following ways:

1. Many regional optometrists will choose to retire early, versus studying for their OT qualifications.
2. Where once Overseas qualified registered experienced optometrists would be sponsored and placed in regional locations, this opportunity will no longer be available practically.
3. Whilst we will have a plethora of OT qualified optometrists in city locations through the influx of graduate optometrists there will be reluctance to work and serve our communities, as has been the case so far.

So, suddenly, we will have an even greater shortage of optometrists in our regional locations and, in addition, we will have an even greater disparity in terms of the level of services and care.

With regards to the growing shortage of optometry, we note that in your consultation document it refers to "From 2013, there will be approximately 250 graduates per annum from Australian universities....". Currently the average number of graduates from Australian universities is at best 130-150 per annum. We sincerely hope the current universities are geared and prepared to take on almost double the students and provide the standard of



education required. We also hope you and the universities have not been misleading in your assessment and public communication.

In closing, we would like to reiterate that we do not support the current registration recommendations for qualified, experienced local or overseas optometrists being forced to gain their OT qualifications within any time frame as part of their registration.

We believe the recommendation, in its current form, does not serve the vision and health interests of our nation and especially our regional communities. Luxottica would be willing to work with the OBA to find workable solutions to better serve the vision and health needs of our nation and invite you and any other Board members to meet with me and my eyecare team at your earliest convenience.

Sincerely,



Chris Beer  
Chief Executive Officer  
Asia Pacific, Greater China & South Africa