

**OPTOMETRISTS  
CONTACT LENS PRACTITIONERS  
BEHAVIOURAL OPTOMETRY  
CHILDREN'S VISION**

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Mr Colin Waldron  
Chair, Optometry Board of Australia,  
G.P.O. Box 9958,  
MELBOURNE VIC 3001



Dear Colin,

Re: Consultation on Registration Standards

We would like to congratulate the Board on this document that sets out a structured and logical pathway to therapeutic Optometric practice in Australia.

We have one important comment to make in that the proposal compels non-endorsed Optometrists to attain therapeutic endorsement by 2029 to maintain the right to practice. This we see as unfair and an educational burden for some Optometrists, some of whom won't want to re-educate.

Whilst in an ideal world this would be simpler for the management of the profession by the OBA, how can the Board justify this requirement in view of the fact that these Optometrists attained their qualifications, maintained their registration, practiced safely and professionally, then to be told they cannot register after 2029 unless they re-educate.

The number of non-endorsed optometrists by then will be in a minority. By my estimate the youngest non-endorsed Optometrist by then will be about 45-50. Why wouldn't the Board consider letting those that wish, practice on until retirement. Eventually all Optometrists will be therapeutically endorsed but this cannot be done by refusing to register non-endorsed Optometrists after 2029.

Issues the Board needs to consider include:

- There will be a sizeable number of non-endorsed optometrists still in 2029. The Boards obligations are to protect the public and not just the simplification of the registration system. How can the Board not register them and take away their right to earn a living? You cannot cite it's in the public interest as they would very likely be able to argue that they have 20-30 years of safe practice behind them.
- If the OBA is adopting this proposal to spur the profession to re-educate but wont enforce the non-registration after 2029 it should re-draft the proposal and be honest in what it states.
- This proposal will lead to legal challenges and courts will be mindful of the safe practicing history of those choosing not to re-educate.

Whilst we can see the reasons behind the Board's proposal, the Board needs to be careful not to push the therapeutics issue too quickly at the expense of those experienced practitioners who choose not to practice with therapeutics.

Yours sincerely

Greg Strachan

Sue Strachan