

1 February 2013

Mr Colin Waldron
Chair, Optometry Board of Australia
Australian Health Practitioner Regulation Agency
Level 7, 111 Bourke Street
Melbourne VIC 3000

By email: optomconsultation@ahpra.gov.au.

Dear Mr Waldron

Re: Public Consultation – Amendments to Guidelines for use of scheduled medicines

Enclosure: Submission from the Royal Australian and New Zealand College of Ophthalmologists (RANZCO) to AHPRA dated 18 January 2013.

After reading the submission from the Royal Australian and New Zealand College of Ophthalmologists (RANZCO) to the Australian Health Practitioner Regulation Agency (AHPRA) on amendments proposed within the *Guidelines for use of Scheduled Medicines* submitted by the Optometry Board of Australia (OBA) through AHPRA for public consultation, I referred both the College submission and the OBA proposal to the Executive of the Australian Society of Ophthalmologists (ASO) for detailed consideration.

The Executive has asked me to convey to you the ASO's full support for the RANZCO submission to AHPRA. The Executive wished to comment specifically on the depth of high quality medical research that was clearly obvious in the response from the College.

The ASO, while wishing to acknowledge the College's premier and unchallengeable position in relation to training, research and clinical oversight of the delivery of world class eye health, also in its own right refuses to accept any unnecessary risk to patients of Ophthalmologists. The ASO considers that this is a real possibility in the amendments proposed by the OBA. Indeed the ASO is gravely concerned that this amendment has been proposed by the OBA on the basis of a graduate certificate comprising only 50 hours of clinical work.

The cogency of the arguments put forward by the College would make it very difficult, on any reasonable basis, for AHPRA to agree to what the ASO considers to be a quite reckless submission by the OBA.

In addition, I intend to make personal and official representation on this issue to the Department of Health and Ageing (DoHA) on my next formal visit to the Department on 25 February 2013. Please be assured that I will continue to pursue any opportunity I can to press this case.

I recommend that AHPRA recognise the real risk to patient safety in the OBA submission and reject it.

I look forward to receiving your reply on this vital patient and best medical practice safety issue.

Yours respectfully,

A handwritten signature in black ink, appearing to read 'AK', enclosed within a large, loopy oval shape.

Dr Arthur Karagiannis MBBS FRANZCO
President
The Australian Society of Ophthalmologists