

Dear Sir or Madam

This is a collective response from the staff of the XXXXXX (XXXXXX) and as such represents a submission from XXXXXX. Individual staff members are free to submit individual responses. However this submission reflects the view of all XXXXXX staff

The Eye Banking Association of Australia and New Zealand (of which, XXXXXX is one of six members) formed a committee to respond collectively to the invitation. To this end, XXXXXX endorses the EBAANZ submission and offers, in addition the following comments:

5 part 3a

This Order does not apply to

(a) human ocular tissue that is manufactured so that its physical (disregarding shape or size) or biological characteristics are altered or is otherwise highly manipulated;

Highly manipulated is undefined. What is the difference between 'manipulated' and 'highly manipulated'

8.

Evaluation and testing of ocular tissue

(1) Corneas must be evaluated by one or more of the following methods. Observations and results obtained from the following examinations and evaluations must be recorded.

This is a good attempt but may be liable to misinterpretation as worded. Further consultation with stakeholders is required to remove ambiguity.

8(4) may be a problem with respect to (v) sclera.

Thank you for inviting the XXXXXX to make a submission on this draft document