

Optometry Australia’s submission to the TGA Consultation: Change to a number of definitions and the scope of the medical device regulatory framework in Australia.

Optometry Australia is the national peak professional body for optometry, representing the over 80% of registered optometrists practicing in Australia. In Australia, prescription contact lenses are considered by the TGA to be medical devices. Contact lenses are applied directly to the anterior ocular surface (the cornea and conjunctiva) to correct refractive errors (myopia, hyperopia, presbyopia and astigmatism) and have therapeutic indications for a range of ocular surface diseases and conditions. Advancing contact lens technologies now provide for safer contact lens wear compared to previous lens materials and designs. Different contact lens materials and care systems provide optometrists with an extensive range of modalities that offer greater choice for the practitioner and improved vision and ocular health for contact lens wearers.

Despite the range of modalities that are available (and their associated safety profiles, which do differ depending upon the mode of wear), complications with contact lens wear, while relatively uncommon,¹ can cause vision loss and/or blindness. This is seen more often in patients who are obtaining cosmetic or plano contact lenses. Often these lenses are sold in shopping centre kiosks or small retail outlets where no fittings or measurements of eye parameters are taken. This can result in mechanical damage to the patient’s ocular surface or undesired chemical interactions. Often those selling cosmetic and/or plano lenses are not trained health professionals and do not provide the consumer with any advice regarding contact lens maintenance, suitable hygiene or appropriate action in the event of an adverse event.

Optometry Australia considers the safest and most effective approach to wearing contact lenses is for lens assessment and evaluation, prescription and ongoing eye health care to be provided by a registered optometrist.² An optometrist is ideally placed to provide appropriate contact lens care; from thorough assessment of the eye and its measurements prior to commencing lens wear to determining the most appropriate contact lens type and all follow up eye health and vision care assessments. Optometrists possess the appropriate expertise and knowledge required to reduce the risk of complications with contact lens wear and ensure clear, comfortable vision.

We would be strongly supportive of the contact lenses (plano, cosmetic and corrective) to be covered by the TGA as suggested.

¹ Stapleton F, Keay L, Edwards K, Naduvilath T, Dart JK, Brian G, Holden BA. The incidence of contact lens-related microbial keratitis in Australia. *Ophthalmology*, 2008; 115(10): 1655 – 62.

² Current legislation in place to support the National Registration and Accreditation Scheme rightly limits prescribing to optometrists and medical doctors.