

Australian Government
Department of Health
Therapeutic Goods Administration
PO Box 100
WOODEN ACT 2606
Via online submission

26 April 2019

RANZCO submission to consultation: Proposed new medical device classification for substances introduced into the body via a body orifice or applied to the skin

The Royal Australian and New Zealand College of Ophthalmologists (RANZCO) welcomes the opportunity to comment on consultation: Proposed new medical device classification for substances introduced into the body via a body orifice or applied to the skin

RANZCO's mission is to drive improvements in eye health care in Australia, New Zealand and the Asia Pacific Region through continuing exceptional training, education, research and advocacy. Underpinning all of the College's work is a commitment to best patient outcomes, providing contemporary education, training and continuing professional development, evidence-based decision making, collaboration and collegiality.

The appropriate emergency eye irrigation solution at the time and place of chemical eye injury, usually before transfer to a healthcare facility, is tap water which of course does not require TGA classification. Should proprietary eye irrigation solutions be necessary at other times and places for chemical injury and any other indication, RANZCO believes they should remain as "Class I sterile" since they are not intended for absorption into the body, the particular feature that would require reclassification.

Should you require any clarification regarding this matter, please contact RANZCO Policy Officer, Stephanie Mulholland, at smulholland@ranzco.edu.

Yours sincerely



David Andrews
RANZCO CEO