

29 June 2017

Committee Secretary
Health, Communities, Disability Services, and Domestic and Violence Prevention
Committee
Email: hcdfsdfvpc@parliament.qld.gov.au

Dear Committee Secretary

**Health Practitioner Regulation National Law and Other Legislation Amendment Bill
2017**

I am writing on behalf of Optometry Australia, the peak professional body for optometrists and optometry in Australia, to express our concern regarding one aspect of the proposed amendments to the *Health Practitioner Regulation National Law* (the National Law.)

We have concerns about the amendments to section 31 of the National Law proposed by the Bill, which will enable the COAG Health Council to make changes to the structure of National Boards by regulation. As you know, the proposed amendments will give the COAG Health Council capacity to make or amend the regulations under the National Law, in order to consolidate, separate or dissolve National Boards.

Whilst the amendments proposed through the Bill also require that the COAG Health Council must undertake public consultation on proposed regulation changes impacting the composition of National Boards, we believe this lacks the safe guards to ensuring community and stakeholder assessment that occurs by requiring legislative change considered and supported by Parliament. We do not believe it is appropriate to delegate legislative power to the COAG Health Council in this manner.

Our primary concern is that the proposed approach provides the potential for reactive responses to issues that may arise, that may see National Boards dissolved and replaced, or consolidated, with limited community consultation.

We believe that the National Boards play an important role in helping ensure patient health and safety and that their original profession-specific composition is critical to this. Given this, we believe it is important to ensure that their composition remains established by legislation and not readily amendable without the processes of Parliamentary consideration.

Thank you for your consideration.

Yours sincerely



Lyn Brodie
CEO, Optometry Australia