

May 3, 2010

Honourable Kevin Falcon
Minister of Health Services
Room 337, Parliament Buildings
Victoria, BC, V8V 1X4

Dear Minister Falcon:

As a global eye health company dedicated to protecting and enhancing the eye health of our patients for over 155 years, Bausch + Lomb is firmly opposed to the recently proposed regulation amendments that change the way contact lenses are prescribed and dispensed to patients in British Columbia.

We are concerned this piece of legislation will undermine the importance of regular eye health examinations with qualified eye care professionals by effectively eliminating prescription control and verification for the dispensing of contact lenses in British Columbia. Bausch + Lomb does not believe the proposed amendments will ultimately serve the eye health needs of British Columbians.

Health Canada classifies prescription contact lenses as Class II Medical Devices and requires that corrective contact lenses 'have be fitted and prescribed by a qualified eye care professional'. The reasons for such requirements include the need for initial professional assessment of eye health and the appropriate fitting of contact lenses to ensure safe and effective vision correction, however regular comprehensive examinations are necessary to assess changes over time in the patient's health, vision needs and contact lens type/parameters. Furthermore, minimizing the risk of compromised eye health and vision due to patients self-selecting lenses without a valid prescription and eye care professional recommendation is critically important.

Bausch + Lomb respectfully requests that the Ministry of Health delay the implementation of the proposed regulation changes until a thorough assessment of the eye health and vision risks is completed and until the relevant experts in eye health and vision care can be appropriately consulted.

Bausch + Lomb welcomes an opportunity to discuss the situation with you further at your earliest convenience.

Sincerely,



Dr. Joseph Barr. O.D., M.S., F.A.A.O.

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