

April 22, 2010

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

Dear Health Services Minister Falcon:

We would like to start by expressing our support for the government of British Columbia's patient focused funding initiative in the pharmaceutical arena announced on April 12. In addition, we support the province's goal of increasing the level of quality health-care services and ensuring those services are appropriate, safe and effective.

It is in this spirit that we would like to share some of our concerns regarding the proposed changes to the regulations for opticians and optometrists under the Health Professions Act, including:

- Removal of most of the restrictions that allow only opticians or optometrists, or workers supervised by them, to dispense contact lenses; and,
- Allowing people to order contact lenses online without providing the seller a copy of their prescription or contact lens specifications.

As a global leader in the research, development and manufacturing of contact lenses and lens care products our specific concerns are with regards to the proposed amendments that specifically address the prescribing and fitting of contact lenses. If implemented as written, the health and safety of the tens of thousands of British Columbians who wear contact lens could be at serious risk.

Contact lenses are classified as Medical Devices by Health Canada and other leading health authorities around the world, and we support the longstanding policy that they should be sold on the basis of a valid, current prescription and advice by



a licensed eye care professional. Since ALL types of contact lenses rest in direct contact with living eye tissue, they must be properly prescribed, fitted and cared for. If not, serious eye damage and injury, including potential blindness can and does result.

In addition, thorough regular eye examinations should be conducted as some eye and general health conditions can go undetected. Sight testing alone is NOT sufficient as this computerized equipment only estimates an individual's refractive error (spectacle prescription), rather than assessing the overall health and neurological function of the eyes and entire visual system. The public at large is unaware of this distinction.

CIBA VISION is committed to the proper dispensing, use and care of contact lenses in addition to the current requirement that all contact lenses be prescribed, fit and followed by eye care professionals who are licensed and trained. Without these provisions in place, patients buying contact lenses are putting themselves at unnecessary risk.

Around the globe, CIBA VISION sells its products to licensed eye care professionals, as well as authorized suppliers, who are properly trained on the importance of contact lenses as Medical Devices. Our contracts with authorized suppliers include specific requirements to address eye health issues. Specifically, authorized suppliers are required to obtain a current valid prescription issued by a licensed eye care professional, adopt and maintain a quality control procedure to ensure the verification and accurate fulfillment of prescriptions and direct consumers reporting pain, discomfort and/ vision related problems back to their prescribing eye care professional for appropriate professional care.

While we support efforts to improve patient access to contact lenses, measures need to be included to maintain the vital imperative of patient safety. Therefore we would kindly suggest a delay on enactment of this initiative until a full review of the data concerning public health risks can be completed. In addition, we would welcome the opportunity to make ourselves available to meet with you and your officials to discuss this important decision. To that end, we will be in touch with your office in the days ahead to find a mutually convenient time to meet, either in Vancouver or Victoria.



Sincerely,



Larry MacGirr
General Manager
CIBA VISION Canada Inc.



Richard E. Weisbarth, O.D., F.A.A.O.
Diplomate Cornea & CL
V.P., Global Head, Professional Development & Partnerships
CIBA VISION

cc: Honourable Gordon Campbell, Premier, British Columbia
Kirsten North, President, Canadian Association of Optometrists

