



A CBC Radio “on the Island” interview with B.C.’s Health Minister, Kevin Falcon.

FALCON SAID

1) The BC government had tried to legitimize sight testing back in 2004. It has been going on at over 100 locations across BC since the late '90s with no problems.

COUNTERPOINTS:

- **NOT TRUE**
  - a) There are documented problems related specifically to sight-testing, and there are many more problems related to undetected asymptomatic disease.
  - b) Many of the documented problems were brought to the attention of government in 2004 – with BCAA providing case studies.
  - c) We have recent case studies which will be submitted to the College of Opticians, and to government shortly.
  - d) A lack of formal complaints to the government or regulatory bodies doesn't mean there aren't any problems. Patients are often embarrassed because they feel they made a foolish decision in being sight-tested, and/or signing a waiver from a sight-tester without really understanding the risk.

FALCON SAID

2) They had been in extensive consultations with all stakeholder groups, including optometrists and opticians, since 2004.

COUNTERPOINTS:

- **MISLEADING**
  - a) Their consultation with us in 2004 led to the Ministry not going forward with the regulatory changes proposed at that time regarding sight-tests.
  - b) There was absolutely no consultation on the latest regulatory changes which will make prescription verification no longer required for online sales of eyeglasses and contact lenses -- which has serious health consequences.
  - c) If these regulatory changes go forward, the medical and professional health expertise on this subject to date will have been effectively dismissed.

FALCON SAID

3) The College of Opticians launched a court case against Coastal Contacts, an online BC-based company that employs 120 people and has millions of dollars in sales all over the world

4) The courts had to uphold the decades old legislation which would have required an Rx (which is basically the only reason the courts found against them) and would've meant the company would relocate – taking jobs with them

COUNTERPOINTS:

- **FAULTY LOGIC, UNINFORMED, MISPLACED PRIORITIES**
  - a) The existing regulations are protecting the public. Without them, patient health is no longer protected.

- b) In the United States, Coastal Contacts was forced by the FTC to comply with US legislation requiring prescription verification. The U.S. doesn't allow online sales of contact lenses and prescription glasses without either a valid prescription or verification from the prescriber because it's not in the best interest of public health.
- c) The jobs of the people working at Coastal Contacts are not at risk. All the company has to do is comply with the regulations that every other company selling contacts or prescription eyewear in North America complies with, and which they themselves were ordered to comply with in the U.S.

FALCON SAID

5) The court case made the government look at the outdated legislation and "modernize" it for the 21<sup>st</sup> Century

COUNTERPOINTS:

- **MISLEADING**
  - a) This, in fact, isn't modernizing the regulations. If implemented, the changes would represent a marked and unwarranted regressive step backward in any first world or developed nation.
  - b) As far as health is concerned, these are "Third World" regulations.
  - c) Every other jurisdiction in North America and Britain has regulations in place to protect patients.
  - d) Any attempt to "Modernize" shouldn't remove safeguards that protect the health and safety of the eyes and vision of British Columbians.

FALCON SAID:

6) The new regulations give people an option b/c sight testing is generally free

COUNTERPOINTS:

- **SHORT-SIGHTED**
  - a) Just because it's free, doesn't mean it's healthy.
  - b) Some opticians already charge for sight tests. There are current examples of opticians charging \$60-75 for a sight test.
  - c) Many sight-tests are only "Free" with the sale of eyewear.
  - d) The cost of sight-tests will likely go up. Opticians are more likely to charge for sight tests now that they need to give a written copy of the results and may lose the sale...the motivation for sight testing was a loss leader to get patients to purchase at their stores and only large chains or optical stores could afford this.

FALCON SAID

7) "There is no strong evidence that suggests regular eye exams improve asymptomatic health outcomes"

COUNTERPOINTS:

- **NOT TRUE**
  - a) 1 in 7 patients presenting for an eye exam have asymptomatic eye disease –Canadian Journal of Optometry article: Prevalence of Asymptomatic Eye Disease

- b) Optometrists are often the first to detect eye and overall health problems – early detection and diagnosis is universally accepted as a factor in improved health outcomes.
- c) We have hundreds of documented cases of British Columbians where detection and diagnosis of eye health problems and overall health problems have resulted in improved health outcomes – from saving people’s vision to saving people’s lives. These cannot be ignored.
- d) The risk of eye infections associated with internet/mail order purchase of contact lenses is nearly five times higher than when lenses were dispensed from an optometrist. Stapleton et al, The Incidence of Contact Lens-Related Microbial Keratitis in Australia. Ophthalmology 2008 Jun
- e) About 40% on contact lens wearers have some sort of contact-lens-related complication. The prevalence of contact-lens-related complications, regardless of lens design, material, and wear modality, highlights the importance of early detection with appropriate professional management and treatment. Prevalence of Contact Lens-Related Complications: UCLA Contact Lens Study, 2009
- f) The contact lens practitioner is obligated to be cognizant of the risks of contact lens wear and consider altering lenses, wearing patterns, or lens-care regimens in response to new knowledge. – Contact Lens-Related Microbial Keratitis, Thomas J. Liesegang, MD, 1997
- g) Most eye conditions such as cataracts, age-related macular degeneration (AMD), glaucoma and diabetic retinopathy have no early symptoms and can be difficult to self-detect, therefore requiring a professional eye care exam. The early detection and treatment of eye diseases such as glaucoma and diabetic retinopathy may prevent or protect eyes against severe vision loss and blindness – 2009 Cost of Blindness Study, CNIB and the Canadian Ophthalmological Society

FALCON SAID:

8) [When pressed by the radio host regarding examples of brain tumors and eye disease detected by ODs, he said ] All of these have been 'symptomatic' patients and would have been screened out by the professionals who sight test.

COUNTERPOINTS:

- **NOT TRUE, and UNIFORMED**
- a) A University of Waterloo study published in the Journal of Optometry in 2003 indicates 1 in 7 people who have an eye exam has *asymptomatic* eye disease -- that is, eye disease with no apparent symptoms to the patients, but which an eye exam can detect.
- b) Blurry vision can be caused by undetected diseases including glaucoma, diabetes mellitus, hypertension, macular degeneration, retinal detachment, cataract, arthritis, or AIDS. Sight testers don’t screen out their clients for blurry vision.
- c) Patients with these undetected diseases may still be correctable to 20/20 visual acuity with new lenses – while the disease remains undiagnosed. It cannot be presumed that good ocular health is present if a patient has or achieves 20/20 visual acuity.

FALCON SAID:

9) We have to 'treat the public like adults and give them credit'

COUNTERPOINTS:

- **INAPPROPRIATE FOR HEALTH SERVICES AND PRODUCTS**
- a) As with many medical procedures, contact lens-wear has become trivialized as patients demand convenience. Consumer education is inadequate for patients to judge the potential risks of

contact lens-wear. Studies now document wide-spread poor compliance with the lens-wearing schedules and with lens-care regimens. *Contact Lens-Related Microbial Keratitis – Thomas J. Liesegang, MD, 1997*

- b) Let's take Falcon's logic and apply it to medications -- should we allow a technician to prescribe medications and allow patients to order their drugs online without prescription validation? And should they be allowed to order medications indefinitely without seeing their doctor? Let's apply this logic to dentistry. Should we allow patients to order braces online and fit them themselves?
- c) Let's apply Falcon's logic to seatbelts. Is the government going to repeal seatbelt laws?
- d) The Minister seems to think an eyeglass prescription is a series of numbers, like a dress size. It's not. This just shows his lack of eye health knowledge and, perhaps, explains why he's not heeding the concerns of health professionals.
- e) Two-thirds (66 per cent) of all Canadians would cash in their savings and / or possessions to save the health of their eyesight. –The Cost of Vision Loss in Canada: Report by Access Economics Pty Limited for the CNIB and the Canadian Ophthalmological Society, 2009)

FALCON SAID:

10) He is unaware of anywhere in North America that mandates an annual eye exam, therefore why should we?

COUNTERPOINTS:

- **THIS IS A RED HERRING.**
  - a) That's not what's at issue here. We're not asking for mandatory eye exams -- we're asking to protect the public from an unsafe health practice that puts British Columbians at risk.
  - b) Just like any prescription, there should be an expiry date, and the prescriber needs to check the patient to make sure the treatment is still appropriate.
  - c) Prescriptions should come from doctors, and people filling the prescription should have to verify it with the prescriber.

NOTE:

11) Despite saying the public would understand the difference, Falcon, at one point, called a sight test a 'free eye test' himself during the interview. Overall, he focused on the need to protect this company and the lack of evidence that eye exams are necessary and the fact that people can judge for themselves if they have a problem that needs addressing.

- a) The Minister doesn't understand the health consequences, doesn't appreciate the risk, yet he expects the public to be able to. This is a case of "you don't know what you don't know." Certain regulations need to be in place to protect people who don't know, including the Minister.