



Dr Larry Kelly

Parliamentary and Management group (PMG)
Office of Devices, Blood & Tissues
Therapeutic Goods Administration
PO Box 100
WODEN ACT 2606

Dear Dr Kelly

On behalf of the Australian Private Hospitals Association (APHA) I am writing to lend our support to the Therapeutic Goods Administration's proposal for the re-classification of joint replacement implants.

APHA is the peak national body representing the interests of the private hospital sector, with a diverse membership that includes large and small hospitals and day surgeries, for profit and not for profit hospitals, groups as well as independent facilities, located in both metropolitan and rural areas throughout Australia. The range of facilities represented by APHA includes acute medical surgical hospitals, specialist psychiatric and rehabilitation hospitals and also free-standing day hospital facilities.

We note that the higher degree of post-market regulation of joint replacement implants has the potential to improve patient outcomes in long term. However we would ask the TGA to consider the feasibility of the two year timeframe for the implementation of these changes. We note that when similar changes were made in the European Union the Commission's directive was adopted in 2005 and that the end of the transition period will not be until 2010. We would therefore ask the TGA to consider any potential impact that the relatively short transition timeframe could have upon the supply of devices to patients and work to overcome any such identified problems.

Please contact me if APHA can assist further on this issue.

Yours sincerely

Michael Roff
CHIEF EXECUTIVE OFFICER
4 Dec 2009