

The Department of Infrastructure,
Transport, Regional Development,
Communications and the Arts
GPO Box 594
Canberra ACT 2601

20th August 2023

Re: New ACMA powers to combat misinformation and disinformation (the *Communications Legislation Amendment (Combatting Misinformation and Disinformation) Bill 2023*)

Dear Officer,

The Department of Infrastructure, Transport, Regional Development, Communications and the Arts (**the Department**) have invited feedback on an exposure draft of the *Communications Legislation Amendment (Combatting Misinformation and Disinformation) Bill 2023 (the Bill)*.

INTRODUCTION – IN THE PURSUIT OF TRUTH

There is a whimsical quote given by a Dean of Medicine to a graduating class of doctors - *“Half of what we taught you is wrong, the problem is we don’t know which half!”*. The quote paraphrases Sir William Osler, considered the father of modern Medicine, *“The philosophies of one age have become the absurdities of the next, and the foolishness of yesterday has become the wisdom of tomorrow.”* Osler provides another wise quote, relevant to the current matter of truth versus misinformation/disinformation: *“No human being is constituted to know the truth, the whole truth, and nothing but the truth; and even the best of men must be content with fragments, with partial glimpses, never the full fruition.”* German philosopher Schopenhauer provided a more pessimistic perspective, but which perfectly encapsulated ‘societal’ or ‘collective’ behaviour; *“All truth passes through three stages. First, it is ridiculed. Second, it is violently opposed. Third, it is accepted as being self-evident.”*

We have witnessed this ‘evolution of truth’ first hand through our pandemic response in matters as diverse as covid-19 origins, benefits vs. harms of lockdowns and masks, purported ‘safe and effective’ vaccines, and a variety of other ‘public health interventions’ for some hypothesized ‘greater good’.

Our elected representatives have legislated exceptions that grant ‘powers’ by States of Exception/Emergency (SOE):

- exceptions to our democracy,
- exceptions to the ethical practice of medicine,
- exceptions to fundamental human rights.

My feedback on **the Bill** is as a Clinical Professor of Ophthalmology [REDACTED] who has practiced as a registered Medical Practitioner for over 30 years and specialist Ophthalmologist for more than 20 of those years. I have previously served as a commissioned officer (Medical) in the [REDACTED] and currently serve my regional community of [REDACTED]. I am a husband, father

and grandfather looking to 'leave something behind' of value in our 'democracy' for 'our children'. As a clinician and academic who has years of conversations with individuals across the breadth and depth of our society, over 100 peer-reviewed scientific publications, along with interactions with 'industry' and the 'systems' we as a society have either created or allowed to develop; I have witnessed the erosion our foundations, not just of science and medicine, but our societal fabric and democratic principles. Not in search of truth and progress, but a society infantilised for 'comfort, safety and protection'. As CS Lewis highlighted *"if you look for truth, you may find comfort in the end; if you look for comfort you will not get either comfort or truth only soft soap and wishful thinking to begin, and in the end, despair."*

Sir Isaac Newton, once said, *"If I have seen further, it is by standing on the shoulders of giants."* In presenting my feedback to **the Bill**, I mention just a few of these giants on whose shoulders I stand and why I consider any form of Mis/Disinformation Bill a dangerous pursuit for our society, and one that takes our society down the path of despair, and not something of value for us to leave behind.

Pursuit of truth is not a new concept as Professor (Dr) John Ioannidis has highlighted in his 2005 publication **"Why Most Published Research Findings Are False"**, *'A pervasive theme of ancient Greek literature is that you need to pursue the truth, no matter what the truth might be'*.¹ Prof. Ioannidis has devoted his career to challenging academia and bad science, as sadly doctors regularly are drawing on misinformation in their everyday practice. My own academic and clinical pursuits have also taken me down the path of the true sceptic distinguishing between true science and 'virtual or pseudo-science' as Karl Popper describes in *"Conjectures and Refutations: The Growth of Scientific Knowledge (1963)"*. We think of the scientific process as being objective, rigorous, and even ruthless in separating out what is true from what we merely wish to be true, but in fact it's easy to manipulate results, even unintentionally or unconsciously. As Prof. Ioannidis described *"At every step in the process, there is room to distort results, a way to make a stronger claim or to select what is going to be concluded."* *"There is an intellectual conflict of interest that pressures researchers to find whatever it is that is most likely to get them funded."*

The Bill is doomed to fail in its objective of ensuring 'truth' as our 'modern scientific foundations' are sadly riddled with misinformation; misinformation which our systems (governments, organisations, experts, people) unhesitatingly rely upon and/or utilise to suit their own purposes and whatever current narrative is being pursued. The deliberate use of that misinformation by our existing systems (organisations, 'experts', key 'opinion' leaders) therefore already constitutes disinformation. The use of pseudoscientific 'fact-checkers' (better termed fact chokers) further spreads that disinformation, in the interests of the 'narrative'. Mis- and dis-information not just proposed but empowered for 'select' exempt bodies by **the Bill**. As has been evident through our 'pandemic response', sadly the greatest objective source of mis- and dis-information have been these very groups **the Bill** seeks to exempt (government, main-stream media, and universities). For example, the World Health Organisation frequently changed their recommendations with respect to several aspects of pandemic management, due to the constantly changing nature of the

¹ **Citation:** Ioannidis JPA (2005) Why Most Published Research Findings Are False. PLoS Med 2(8): e124. <https://doi.org/10.1371/journal.pmed.0020124>

science and evidence. The State and Territory Governments were similarly turbulent in their recommendations; many of which have subsequently proven to be incorrect. If **the Bill** had been passed before the pandemic, thousands of Australians who shared their opinions, often evidence based, on these recommendations could have been found to have engaged in 'misinformation'; despite later being vindicated as the science and evidence properly emerged. This would be an unacceptable, counterproductive and dangerous state of affairs.

*Good scientists fight misinformation by doing good science.
Tyrants fight misinformation by censoring in the name of science.
Pseudo-scientists fight misinformation by aiding the tyrants.
The solution to misinformation is providing better information.*

The tyranny of censorship is the reputational destruction of critics of the powerful, and the manufacture of false consensus by preventing other sides (truths) of a story from being heard. My concerns are not speculative, **Section 33 of the Bill** highlights ACMA can use technology to block me and trusted fact checkers to 'judge' my content.

The Tyranny of Censorship is that it first silences marginalised people. There are two critical sides to democracy - on the one hand majority rule, and on the other is minority rights. The smallest minority in societies is the individual whose rights seems to have been usurped by **this Bill**.

HUMAN RIGHTS SHOULD BE PROTECTED BY THE RULE OF LAW (UN, 1948)

"It is essential, if man is not to be compelled to have recourse, as a last resort, to rebellion against tyranny and oppression, that human rights should be protected by the Rule of Law. — United Nations Universal Declaration of Human Rights, 1948"

I would like to examine those human rights, my rights, all of our individual rights; as **the Bill** as presented (and probably in any form) **would render Australia's commitment to freedom of speech and expression (fundamental internationally recognised human rights) meaningless.**

The Bill is not just about censorship of speech, but more disturbingly censorship of reach (as the mechanism by which to limit Freedom of speech). Ultimately **the Bill** is about criminalising dissent in the name of mis- and dis-information. Criminalisation of dissent that already exists for doctors with legislation passed in October 2022 in Queensland, the '*Health Practitioner Regulation National Law and Other Legislation Amendment Bill 2022*', and agreed to be adopted in other jurisdictions.

Australia is a party to seven core international human rights treaties, which in turn are based upon principles of Natural Law and Democracy espoused by philosophers for Millenia. Mostly relevantly to **this Bill** is Australia being a signatory to the *International Covenant on Civil and Political Rights (ICCPR)*.

Article 1 of the ICCPR – Right to Self-Determination

1. All peoples have the right of self-determination. By virtue of that right they freely determine their political status and freely pursue their economic, social and cultural development.

My right to “Social and cultural development” necessarily includes the interaction with, and sharing of, ideas online/digitally including by websites and social media platforms. **The Bill** has not adequately identified how it will not impede my right to self-determination. In particular censorship of reach (via digital platforms) as proposed in **the Bill**.

Article 18 of the ICCPR – Freedom of Thought, Conscience and Religion

1. Everyone shall have the right to freedom of thought, conscience and religion. This right shall include freedom to have or to adopt a religion or belief of his choice, and freedom, either individually or in community with others and in public or private to manifest his religion or belief in worship, observance, practice and teaching.

The Bill as proposed (and likely in any ‘censorship’ form) threatens my right to freedom of thought which includes **the freedom to express my thoughts**, and freedom of conscience which includes **the right to have access to a broad range of information which might inform my conscience**. As the drafters and signatories of ICCPR recognised, even existential threats as defined under its Article 4 do not apply to my rights under article 18, such is its import.

Article 19 of the ICCPR – Freedom of Expression

- 1. Everyone shall have the right to hold opinions without interference.*
- 2. Everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice.*
- 3. The exercise of the rights provided for in paragraph 2 of this article carries with it special duties and responsibilities. It may therefore be subject to certain restrictions, but these shall only be such as are provided by law and are **necessary**:*
 - (a) For respect of the rights or reputations of others;*
 - (b) For the protection of national security or of public order (ordre public), or of public health or morals.*

My right to Freedom of expression would be jeopardized by **this Bill** and **the Bill** as presented does not adequately define the ‘necessity’ for me to be subject to these restrictions or the ‘harm’ that might eventuate if the ACMA restrictions proposed in **the Bill** to ‘protect’ did not exist. I have emphasized necessary in Article 19 of the ICCPR above as this high bar (*Neccesitas legum non habet* - Necessity has no law) **requires** that **this Bill** and the powers granted to ACMA have been identified as ‘**absolutely essential**’ for the protection of national security, public order, public health or morals. **The Bill** and accompanying information has not defined what the specific nature of ‘the problem’ is, the harms demonstrated to have arisen from that ‘problem’, that no alternative (less onerous) solutions under current legislation exist, nor exactly how the proposed **Bill** actually solves ‘the problem’.

Under the provisions of *the Australian Human Rights Commission Act 1986 (Commonwealth)* the Australian Human Rights Commission (**AHRC**) would have a statutory obligation to examine **the Bill** to ensure that my human rights (such as freedom of expression) would not be affected by **the Bill** if passed. I will most definitely be making a complaint to AHRC should **this Bill** be passed.

Under the provisions of the *Human Rights (Parliamentary Scrutiny) Act 2011* I have not seen a publicly released Statement of Compatibility, assessing the compatibility of the proposed legislation with the rights and freedoms recognised in the seven, core international human rights treaties that Australia has ratified, including the ICCPR. It is particularly concerning that **the Bill** proposes illusory protections of my 'freedom of political communication' as ACMA is defined as the sole arbiter of 'misinformation standards' and must only 'consider' based on 'any circumstances it considers relevant' whether my freedoms have been reasonably curtailed. Problematically **the Bill** only invites me retrospective correction via litigation, rather than ensuring ACMA pays appropriate mind to my human rights in the first place.

The Fact sheet accompanying the Bill states "*misinformation and disinformation pose a threat to the safety and wellbeing of Australians, as well as our democracy, society and economy*". The accompanying **Guidance Note to the Bill** states "*The proposed powers seek to strike a balance between the public interest in combatting the serious harms that can arise from the propagation of misinformation and disinformation, with freedom of speech.*"

The mechanism of **the Bill** and implementation of ACMA's powers will be systemic (presumably algorithmic/rules based) rather than individually focussed - this is in itself misleading double-speak as it is effecting silence of (individual) speech via silence of (systemic) reach. Ultimately the powers granted ACMA by **this Bill** Criminalise dissent from whatever 'consensus' authority position is held and most certainly do not contain sufficient protections for individuals lawfully exercising their **fundamental human right to Self-determination, Freedom of expression, and Freedom of thought and conscience and religion.**

Of final legal concern are the quasi-judicial powers that **Division 3 of the Bill**, innocuously titled "*Information gathering*" grants to ACMA. Even the protections available to defendants in the criminal charge and hearing process are not afforded to digital platform providers (which again, can be individuals) under **this Bill**. The provision of this unbounded quasi-judicial authority subverts the rule of law and common law rights, while granting to ACMA a star chamber-like authority not afforded under the Constitution.

The Bill defines misinformation and disinformation as "false, misleading or deceptive content" that may cause 'harm'. None of these terms however are defined in **the Bill**. **The Bill** is disingenuous in its attempt to state an affinity for my freedom of speech and expression, instead offering several mechanisms for how my rights can be curtailed by ACMA. The uncertainty this creates would almost certainly result in my censorship by digital platforms out of caution in an effort to avoid potential liability. My fundamental rights cannot be overridden by undefined, general or ambiguous words as are contained within **this Bill**.

Human rights are acknowledged by Government, not granted or removed.

“SOVEREIGN IS HE WHO DECIDES ON THE EXCEPTION” (Schmidt)

The Bill is one of the most concerning and dangerous pieces of legislations I have seen proposed. Not just because **The Bill** would allow the Australian Communications and Media Authority (**ACMA**) substantial, unilateral and discretionary authority to govern all forms of media. More insidiously, because of the powers granted to those explicitly excepted from **the Bill's** operation. Should the Bill or a revised iteration of it be passed, then it will join existing manifestly dangerous legislation that already suspends democracy and fundamental human rights under states of exception/emergency, such as our various Public Health Acts and Biosecurity Acts.

The Bill authorises and therefore empowers (by exemption) certain parties/bodies to mis-inform or dis-inform. Under **the Bill** Government, Mainstream Media and Universities can lie, while a truth-teller by holding a dissenting opinion to the ‘arbiters of truth’ can be criminalised.

Foucault taught that *“power determines everything, truth is simply an expression of power and knowledge is neither true nor false but instead is made legitimate or illegitimate by established power”*. This means whenever a power is granted, inevitably it will be abused. As CS Lewis wrote, it is *“the magician’s bargain: give up our soul, get power in return. But once our souls, that is, our selves, have been given up, the power thus conferred will not belong to us. We shall in fact be the slaves and puppets of that to which we have given our souls.”*

These are not hypothetical matters. Already AHPRA has been granted unprecedented powers by the ‘*Health Practitioner Regulation National Law and Other Legislation Amendment Bill 2022*’ (**Doctor Gag Bill**) to coercively silence doctors who stray from the officially mandated public health ‘narrative’ even if the doctor ‘speaks evidence-based truths’. Just as with **this mis- and dis-information Bill**, the explanatory notes to the **Doctor Gag Bill** state the regulatory body will be free to take action against a doctor or health practitioner in any way they deem ‘necessary or convenient’ to ‘safeguard’ public confidence and safety.

*“Speaking truth to power is emotionally demanding”*² let alone practically meaningless because power is law, and law is decisionist: “this time is different”; difference being the very nature of exception!

“The exercise and enjoyment of power is rarely conducive to speaking the truth; rather the reverse.” (Foucault)

Telling thoughtful truths should not be a revolutionary act. Speaking truths to power should not be sacrificial.

² Dave A. Speaking truth to power is emotionally demanding *BMJ* 2022; 376 :o91 doi:10.1136/bmj.o91

***“WE LEARN FROM HISTORY THAT WE DO NOT LEARN FROM HISTORY”
(Hegel).***

This lesson has become increasingly apparent over my academic and medical career and observations of the changes in our societal fabric - meaning the ignorant will be doomed to repeat the mistakes of the past.

Accusations of misinformation/disinformation is exactly what Socrates was sentenced to death for. As recounted by Plato:

*“Me you have killed because you wanted to escape the accuser, and not to give an account of your lives. But that will not be as you suppose: far otherwise. For I say that there will be more accusers of you than there are now; accusers whom hitherto I have restrained: and as they are younger they will be more severe with you, and you will be more offended at them. For if you think that by killing men you can avoid the accuser censuring your lives, you are mistaken; that is not a way of escape which is either possible or honorable; the easiest and noblest way is not to be crushing others, but to be improving yourselves. This is the prophecy which I utter before my departure, to the judges who have condemned me.
– Plato’s The Apology”*

Socrates defends himself well, against the accusation of misinformation (corruptor of the youth). Socrates rightly identifies that he is hated by certain men not because he corrupts, but because they are afraid he will cause them to face their own errors and fallacies (i.e. those governing). Socrates also prophesizes that to crush dissenting opinions, as they are attempting to do with Socrates, will not make your problems go away, but will instead multiply and cause them to become more severe. The fate of such a society? – history confirms, chaos and tyranny and the inevitable destruction of that democracy. Some centuries later Cicero reminds us again with the same message of power and censorship, again warning of the decline of democracy into chaos and tyranny under Mark Antony.

Again, only a few centuries later St Augustine of Hippo underscored that there is no need for censorship to protect truth, *“The truth is like a lion; you don’t have to defend it. Let it loose; it will defend itself.”*

US President Harry Truman bringing us to modern politics emphasised, *“Once a government is committed to the principle of silencing the voice of opposition, it has only one place to go, and that is down the path of increasingly repressive measures, until it becomes a source of terror to all of its citizens and creates a country where everyone lives in fear”.*

When the public is no longer the arbiter of truth, and that role becomes usurped by bureaucrats and governments, history suggests that the resultant censorship erodes the public’s collective trust in authority. As Socrates, Plato and Cicero so plainly described and which history has repeatedly demonstrated, censorship signals the downward spiral of democracy - down this path leads the death of democracy and totalitarianism.

Political theorist Eric Voegelin, who studied the totalitarian regimes of the 20th Century, noted that the common feature of all totalitarian systems is the *prohibition of questions*. These regimes begin by monopolizing what counts as rationality - what counts as acceptable public knowledge - and then place any dissidents outside the pale of rational conversation. Surveillance of dissident thoughts and behaviours and censorship of dissenting opinions then expand together. People in authority lie and our job in a democracy is to remain sceptical. *"The truth is never decided by majorities"* (Hitchens).

Trusting experts is not a feature of science, and it's not a feature of democracy. It's a feature of religion and totalitarianism.

Until Copernicus confirmed the sun as centre of the solar system, 99.9% of the world considered the earth was the centre of the universe. Galileo embraced Copernicus' knowledge stating – *"all truths are easy to understand once they are discovered, the point is to discover them."* Galileo was sentenced by the church (prevailing power) to abandon his ideas (dissent) and was imprisoned until his death. In a speech to English Parliament in 1644 Poet John Milton, arguing against censorship commented *"There it was that I found and visited the famous Galileo grown old, a prisoner to the Inquisition, for thinking in Astronomy otherwise than the Franciscan and Dominican licensors thought."* Just as in Galilean and then Newton's progression of our understanding of physics and motion; friction is an essential element of all human experience. It is through friction of speech and thought that progress is made.

As Prof. John Ioannidis has warned, science has become our newest religion ('trust the experts' - whether that be public health, climate, educational/academic). Science is never proved by consensus - in fact as Popper best describes, nothing can ever be proven by science - only prevailing theories disproved.

Finally, three modern warnings about the dangers of 'arbiters of truth'.

- It is less than 100 years since frontal lobotomy was first performed (1935). Ashamedly, 'scientific consensus' led this procedure to be awarded the Nobel Prize in Medicine in 1949.
- Few people would be aware of the Cutter polio vaccine disaster.³ *'The disease caused by Cutter's vaccine was worse than the disease caused by natural polio'*, in the end at least 220,000 were infected, 70,000 developed paralysis (75% for life), 164 severely and 10 died. This travesty, in the interests of 'public health' good was covered up (censored i.e dis-information) for more than 50 years because 'the public should be spared the ordeal of "knowledge about controversy"'. Dare it undermine confidence in public health (where else have we heard that? Doctor Gag Bill).

³ Fitzpatrick M. The Cutter Incident: How America's First Polio Vaccine Led to a Growing Vaccine Crisis. J R Soc Med. 2006 Mar;99(3):156. PMID: PMC1383764.

- Lastly in my own field of Ophthalmology. The story of Harold Ridley inventor of the intraocular lens for cataract surgery.⁴ Ridley an insightful brilliant eye surgeon recognised that Perspex in eyes of injured World War 2 pilots was inert. Subsequently in 1949 (the same year frontal lobotomy is awarded a Nobel Prize), Ridley performs a revolutionary operation in secret, implanting a new device, the intraocular lens, which replaces the cloudy cataract. Word leaks out two years later, and **the world's most prominent ophthalmologist (Sir Duke-Elder) vilifies and ostracizes Ridley**. Ridley suffers from depression, an outcast in his profession. Ralph Nader and Sydney Wolfe petition the FDA to outlaw the lens. It took over 40 years for Ridley's truth to be 'self-evident' and the intraocular lens and Ridley to be accepted. Ridley's truth in the face of prevailing 'expert arbiters of truth' "*changed the world so that we might better see it*".⁵ Millions of patients around the globe have regained their vision from the intraocular lens. Truth came at a great price for Sir Harold Ridley, thankfully recognised at 93 years of age, when knighted by Queen Elizabeth.

'Arbiter of truth' processes are not benign, as 16 doctors in just 4 years have sadly experienced when subjected to AHPRA notification, "*Deeply confronting' findings show acute distress of AHPRA notifications*" with 16 suicides among practitioners facing regulatory scrutiny.⁶

'Arbiters of truth' by 'consensus' in any thought or speech is dangerous and returns our society to Spanish inquisition days but with far wider implications for maintaining a position in society given our interconnectedness digitally. That is why censorship in any form and **this Bill** in particular is so concerning to me. Existing State of Exception/Emergency legislation has already progressed well down the path of unchecked human rights abuses under the guise of Medicine and in the name of 'safety' (eg Doctor Gag Bill, Public Health Acts, Biosecurity Act). Doctors already are left in the impossible position of needing to hold the primacy of the patient's right to autonomy and informed consent but not when this scientific evidence deviates from the position stated by Public Health even when Public Health is demonstrably and manifestly wrong. **This Bill** if passed will join many others that have granted inappropriate and unchecked powers to unelected bodies capable of imposing regulatory frameworks that haven't even been created yet, and not subject to meaningful challenge.

I Fundamentally and vehemently oppose **this Bill**. If such legislation is allowed to pass, it will not only signal the death knell of the internet as a free marketplace of ideas in Australia, but it will signal to Australian citizens, and to citizens of the globe, that the Australian Government seeks total control of the dissemination of information within its borders, and that such control is more valuable to that Government than the individual rights of its citizenry. That would be a dark day for democracy indeed, were such a thing to pass.

⁴ *Sir Harold Ridley and His Fight For Sight* by David Apple, M.D. (Slack Books, 2006).

⁵ Trivedi RH, Apple DJ, Pandey SK, Werner L, Izak AM, Vasavada AR, Ram J. Sir Nicholas Harold Ridley. He changed the world, so that we might better see it. Indian J Ophthalmol. 2003 Sep;51(3):211-6. PMID: 14601845.

⁶ <https://www1.racgp.org.au/newsgp/professional/deeply-confronting-study-reveals-acute-distress-of#:~:text=The%20regulator%20has%20released%20study,January%202018%20to%20December%202021.>

On current construction, if **the Bill** is passed, ACMA could create and then enforce rules, codes and standards that contain anything ACMA wants; without oversight, and without the ability for users of digital platforms, or those platforms themselves, to question or challenge those rules. The provision of this arbitrary rule making authority subverts representative democracy while granting ACMA a head of power not found under the Constitution. Just as has occurred through the pandemic with the abuse of powers by our public health officers (at the willing supercilious encouragement of various governments) the additional power that **the Bill** grants ACMA to “determine standards [in] emerging circumstances”; that is, that ACMA only needs to consider it “necessary **or convenient**” (emphasis added) to create standards “in order to provide adequate protection for the community from misinformation or disinformation on the services”. The use of the word “convenient” betrays the intent of the drafters; the discretion offered to ACMA is designed to be as broad, and as difficult to challenge, as possible. Just as challenging public health orders including mandates have proven. Our pandemic response exercised through administrative powers granted to unelected bodies and persons, totally trashed medical ethics and fundamental human rights and our courts willingly obliged the administrative response to the manifest detriment of our society. The challenge for our democracy is not that these states of exception/emergency have been (or will be) misapplied ‘on this occasion’, but that states of exception for our democracy are an abuse of fundamental human rights on any occasion. These abuses are only remedied by their abolition.

This Bill should be abandoned. Existing State of exception/emergency legislation (eg Public Health Acts, Doctor Gag Bill) should be amended to abolish those powers that breach fundamental human rights to which Australia is a signatory. Otherwise, our democracy truly is meaningless. Sadly the vocation of Medicine is rapidly becoming so.

“It is essential, if man is not to be compelled to have recourse, as a last resort, to rebellion against tyranny and oppression, that human rights should be protected by the Rule of Law. — United Nations Universal Declaration of Human Rights, 1948”



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