

Zealand without reciprocal arrangements or local clinical examinations.

I fully support a strong, well-regulated dental workforce and recognise the value that internationally trained professionals can bring. However, I am deeply concerned that the current proposal risks undermining patient safety, workforce sustainability, and the integrity of professional regulation unless further safeguards and transparency are provided.

In particular, I would respectfully ask the Council and Government to address the following issues:

1. Workforce need and evidence

There is currently no clear, independently published evidence of a national dentist shortage in Australia or New Zealand. On the contrary, registration numbers are steadily increasing. I request that workforce modelling and demand projections be publicly released to justify this policy direction. We understand rural communities may have a

shortage, but our cities have a surplus of dentists with many local graduates struggling to get enough work in our main centres such as Auckland, Sydney and Melbourne.

2. Comparability of education and clinical standards

The term “competent authority” and “comparable health systems” requires clearer definition. Dental education, training models, and clinical oversight vary significantly across countries. Without robust benchmarking, it is difficult to ensure equivalence in clinical competence, patient safety standards, and regulatory enforcement.

3. Quality assurance and ongoing oversight

I am concerned that some overseas regulators do not assess or monitor clinical performance to the same depth as local authorities. What mechanisms will be in place to ensure equivalent quality, supervision, and accountability? As a clinical tutor at University of Sydney for post-graduate students, I have seen first hand the importance of accreditation to ensure our education standards are upheld for patient and public safety.

4. Fairness to locally trained and examined dentists

Australian and New Zealand graduates, as well as internationally trained dentists who have completed rigorous local examinations, may be disadvantaged by a system that permits alternative entry without equivalent assessment. This appears inconsistent with stated commitments to fairness, equity, and merit-based registration.

5. Transparency and stakeholder consultation

Many practitioners feel that responses to professional concerns have been limited or dismissive. I respectfully request genuine consultation, publication of the policy evidence base, and clear explanation of how risks will be mitigated.

I strongly urge the Council and Government to pause and review this proposal with transparent data, independent workforce analysis, and full stakeholder engagement before implementation.

Thank you for considering these concerns. I would appreciate a written response outlining how patient safety, professional standards, and workforce sustainability will be protected.

Yours sincerely,
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