



Page 2: About your submission

Q1

First name

Hung Bun

Q2

Last name

Choy



Q4

Are you primarily based in New Zealand or overseas?

Overseas,
If overseas, where?:
Canada

Q5

Company/organisation name

Respondent skipped this question

Q6

In what capacity are you making this submission?

Registered oral health practitioner

Page 3: About your submission

Q7

What is your profession?

Dentist

Q8

Please enter your Dental Council Person ID, if applicable

Respondent skipped this question

Page 4: Proposed registration pathways

Q9

Yes

Do you believe the proposed changes will help reduce barriers to registration for suitably trained overseas practitioners?

Q10

Please tell us why:

I support the proposed changes. I particularly agree with re-opening the dental hygiene, dental therapy, and oral health therapy examinations to those with a dentist degree. This allows practitioners to determine their own career pathways while ensuring they are still rigorously tested for competence in that specific scope. Additionally, I support the requirement that USA licensing examinations must include a psychomotor clinical skills assessment. Practical skills are fundamental to dental practice, and ensuring that all overseas practitioners regardless of where they were trained have undergone a physical skills assessment is vital for maintaining high clinical standards and public safety in New Zealand.

Page 5: Introduction of the proposed 'Competent authority - registration' pathway

Q11

Support

Do you support the introduction of the 'Competent authority - registration' pathway?[Click to learn more about the proposed pathway](#)

Q12

Please tell us why:

I support this introduction because it reduces unnecessary regulatory barriers for experienced practitioners while maintaining public safety through the 6-month oversight period. By recognizing practitioners from jurisdictions with equivalent standards like the UK and Canada New Zealand can more efficiently address workforce needs. I particularly agree with the requirement for the 'Dental practice in New Zealand' module, as it ensures that even technically competent overseas dentists are properly oriented to the local cultural and regulatory environment.

Page 6: Introduction of the proposed 'Comparable health system' pathway

Q13

Support

Do you support the introduction of the 'Comparable health system' pathway for dentists?[Click to learn more about the proposed pathway](#)

Q14

Please tell us why:

I support the introduction of the 'Comparable health system' pathway for dentists. This pathway appropriately recognizes that countries like Hong Kong have comparable health infrastructure, regulatory frameworks, and population health outcomes to New Zealand. By allowing experienced dentists from these jurisdictions to register, New Zealand can more efficiently increase the pool and diversity of its oral health workforce.

The proposed 12-month direct (onsite) supervision period and the 'Dental practice in New Zealand' module provide sufficient safeguards to ensure public safety while allowing the practitioner to integrate into the local healthcare environment.

Proposed Modification: Clinical Practice Requirements

However, I suggest that the Council reconsider the requirement for 33 months of clinical practice within the 48 months prior to application.

Rationale for change: Many high-caliber dentists in recognized jurisdictions, such as Hong Kong, seek to further their international qualifications by completing the National Dental Examining Board (NDEB) of Canada Equivalency Process.

The Disruption: This rigorous process often requires practitioners to pause their full-time clinical practice to focus on intensive study and practical examinations.

Recommendation: The current 33-month requirement may inadvertently penalize these ambitious practitioners by creating a gap in their "recent" clinical hours. I recommend reducing the 33-month requirement or allowing for a broader 60-month window to account for such professional development and international examination efforts. This would ensure that New Zealand does not lose out on highly motivated, internationally-validated dentists who have undergone significant additional testing.

Page 7: Introduction of the proposed 'Teaching and research' pathway

Q15

Support

Do you support the introduction of the 'Teaching and research' pathway?[Click to learn more about the proposed pathway](#)

Q16

Please tell us why:

I support the introduction of the 'Teaching and research' pathway. It is a pragmatic solution to the shortage of oral health educators in New Zealand. By creating a dedicated pathway for academics, New Zealand tertiary institutions can attract global expertise that will directly improve the training of local students.

I agree with the Council's decision to limit this registration to clinical teaching and research environments only. This ensures that while the education sector benefits from international talent, the public is protected by preventing these practitioners from entering independent private practice without meeting the full general registration requirements. This is a much-needed improvement over the previous 'limited general' registration model.

Page 9: Proposed removal of requirement for a medical degree for oral medicine specialist registration

Q17

Support

Do you support removing the requirement for a medical degree for oral medicine specialist registration in New Zealand, subject to the relevant medical training and clinical experiences being embedded into the specialist training programme?[Click to learn more about the proposed changes.](#)

Q18

Please tell us why:

I support removing the requirement for a stand-alone medical degree for oral medicine specialist registration. The current requirement acts as an unnecessary barrier for highly qualified practitioners from jurisdictions like the UK, USA, Canada, and Australia, where medical training is already integrated into the dental specialty curriculum.

As long as the Council clearly articulates the required medical components and ensures they are embedded in accredited specialist programmes, public safety will be maintained. This change will allow New Zealand to better recruit much-needed specialists and align its registration process with contemporary international educational standards.

Page 10: Proposed removal of requirement to register in dental technology before registering in CDT

Q19

Support

Do you support removing the requirement to register in dental technology before registering in clinical dental technology? Click to learn more about the proposed changes.

Q20

Please tell us why:

I support the removal of the requirement to register in dental technology as a prerequisite for clinical dental technology registration. As the Council has noted, this requirement creates an unnecessary barrier that is inconsistent with how other scopes, such as dental specialties, are regulated.

Since the clinical dental technology scope already incorporates the necessary technical competencies of dental technology, requiring dual registration does not provide additional public safety benefits. Removing this requirement aligns with the Council's goal of reducing regulatory burdens while recognizing clinical dental technology as a distinct, standalone profession.

Page 11: Proposed changes to the New Zealand registration examination requirements

Q21

Support

Do you support the proposed changes to the New Zealand registration examination requirements? Click to learn more about the proposed changes.

Q22

Please tell us why:

I support the proposed changes to the New Zealand registration examination requirements. Specifically, I agree with re-opening the dental hygiene and therapy examinations to candidates with a dentist degree; this empowers practitioners to take responsibility for their own career pathways while ensuring they still meet the Council's rigorous standards through the examination itself.

Additionally, I support the clarification regarding USA licensing examinations, as a practical clinical skills assessment is essential for maintaining the high standard of oral healthcare provided to the New Zealand public.

Page 12: Proposed administrative changes to the prescribed qualifications

Q23

All scopes

Do you have feedback on the proposed administrative changes to prescribed qualifications for any of the scopes of practice, as reflected in the draft Gazette notices?

Q24

Please tell us your feedback. When discussing multiple scopes, please indicate clearly which scope of practice you are referring to in your comment.

I support the proposed administrative changes, such as renaming the 'Competent authority qualification' pathway. This terminology provides much-needed clarity for overseas practitioners by clearly distinguishing between registration based on a degree versus registration based on clinical experience. These updates ensure the Gazette notices remain contemporary and legally robust.

Page 13: Proposed fees for the new registration pathways

Q25

Yes

Do you find the proposed fees for the new registration pathways reasonable?Proposed fee notice

Q26

Please tell us why or why not?

I find the proposed fees reasonable, provided they remain strictly aligned with the actual administrative costs as stated.

Page 14: Thank you for your time

Q27

Is there any additional feedback you would like to share on the consultation?

While the proposed changes are a significant step forward in reducing barriers, I wish to provide feedback on the recency of practice requirements for the 'Comparable health system' pathway.

The Barrier: The current proposal requires dentists to have practiced for at least 33 months (at 20+ hours per week) during the 48 months prior to their application.

The Impact on High-Caliber Practitioners: This requirement may inadvertently block highly motivated dentists from recognized jurisdictions (such as Hong Kong) who choose to relocate to challenge the National Dental Examining Board (NDEB) of Canada Equivalency Process.

The Disruption: Challenging international exams like the NDEB often requires a practitioner to pause their clinical work to focus on intensive study and practical assessments. Under the current 48-month window, a dentist who spends a year or more preparing for and completing these exams which are themselves a rigorous validation of competence could fail to meet the 33-month practice threshold.

Recommendation: I recommend that the Council introduces more flexibility for those who have been engaged in formal international examination processes or advanced dental education during that 48-month period. This could be achieved by:

Reducing the 33-month requirement to acknowledge the "high-risk, high-reward" nature of international credentialing.

Extending the look-back window from 48 months to 60 months for practitioners who can prove they were actively pursuing internationally recognized qualifications (like the Canadian NDEB).

Ensuring that these 'top-tier' practitioners are not penalized for seeking additional international validation will help New Zealand attract the most dedicated and skilled dentists from comparable systems.
