

Submission on Overseas Dentist Registration Pathways – Perspective from Southeast Asia

To Consultations <Consultations@dcnz.org.nz>

Dear Dental Council of New Zealand,

I am writing to provide feedback on the 2025 consultation regarding proposed overseas dentist registration pathways, particularly from the perspective of dentists trained and practising in Southeast Asia.

I commend the Dental Council for recognising the current and projected shortages in the dental workforce and for proposing new pathways that aim to balance workforce needs with public safety. The intent to streamline registration while maintaining high standards is both timely and important.

However, I wish to respectfully raise a concern regarding the current definition of "comparable health systems" and "equivalent jurisdictions," which appear to be limited largely to high-income countries. While regulatory equivalence is essential, this approach may inadvertently exclude a substantial number of highly competent dentists from regions such as Southeast Asia, where dental education, postgraduate training, and clinical exposure are often robust and intensive.

In many Southeast Asian countries, including Indonesia, dental schools are nationally accredited, curricula are aligned with international standards, and graduates typically gain extensive hands-on clinical experience due to high patient volumes and diverse case complexity. In addition, a growing number of dentists from this region hold recognised postgraduate qualifications, specialist training, and years of independent clinical practice.

Given the Council's objective of addressing workforce shortages, particularly in underserved and rural areas, I respectfully suggest consideration of the following:

- Greater emphasis on **individual practitioner competence**, including postgraduate qualifications, specialist training, and demonstrated scope of practice, rather than reliance on country-level equivalence alone.
- The introduction of **structured bridging or provisional pathways** for dentists from non-listed jurisdictions, incorporating supervised practice, targeted assessments, or competency-based evaluations.
- A transparent and regularly reviewed framework that recognises regions with strong clinical training environments, even if their broader health systems differ structurally from New Zealand's.

Such measures could enhance fairness, widen the pool of qualified applicants, and allow New Zealand to benefit from experienced dentists who are clinically prepared and motivated to contribute to the

healthcare system, while continuing to safeguard patient safety.

Thank you for the opportunity to participate in this consultation. I appreciate the Council's consideration of these perspectives and its ongoing work to develop a sustainable and inclusive registration framework.

Yours sincerely,

Joseph