

23 January 2026

Marie MacKay

Chief Executive

Dental Council (New Zealand)

Level 7, 22 The Terrace

Wellington 6011

Email: marie.mckay@dcnz.org.nz

Kia ora Marie,

Re: Consultation on three new proposed registration pathways for overseas practitioners and updates to existing prescribed qualifications

Thank you for the opportunity to provide feedback on the new proposed registration pathways for overseas practitioners. I am making this submission on behalf of the University of Otago Faculty of Dentistry in my capacity as Deputy Dean (Clinical).

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

Yes, the proposed changes will provide new pathways to registration for suitably trained overseas practitioners who currently need to undertake either an individual assessment or a registration examination to gain registration. This will reduce barriers to registration that are currently experienced by suitably trained overseas practitioners, with a process that appears to protect public health and safety as the potential risk associated with the registration pathway increases. The Faculty of Dentistry also welcomes the introduction of the Teaching and Research registration pathway. The Faculty consider that this pathway will provide a mechanism to enable suitably trained, qualified and experienced overseas practitioners to supervise in teaching clinics under the supervision of an appropriate Faculty supervisor who may not have otherwise been able to, because, for example, they are awaiting the outcome of a registration application in another pathway.

2. Do you support the introduction of the 'Competent authority - registration' pathway?

The Faculty supports this registration pathway. Although the competent authority registration pathway exists in part as the existing overseas prescribed qualification pathway, it will recognise applicants who hold full (unrestricted) registration with a competent authority(s) and have been successfully practising clinically there for a period of time, even if their primary qualification is not from a competent authority, and even if they don't hold a prescribed qualification. This pathway recognises those practitioners who have been competently practising with a competent authority. It may also open up registration

Office of the Head of Faculty

PO Box 56, Dunedin, New Zealand.

Tel +64 3 479 7122 • Email karl.lyons@otago.ac.nz • Web www.otago.ac.nz

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opportunities across the range of oral health professions for practitioners who have been successfully practising, are currently registered with a recognised competent authority, and have the specified recent clinical experience.

3. Do you support the introduction of the 'Comparable health system' pathway for dentists?

Yes, the Faculty supports the introduction of this pathway, noting that it is currently proposed only for dentists to apply for registration in the General Dental Practice scope of practice. It would be helpful to know more about the 'Dental Practice in New Zealand' module, which aims to orient practitioners to the New Zealand healthcare system, regulatory and practising environment, and how this will help applicants adapt to dental practice in New Zealand. Additionally, as registrants won't have been registered by a recognised competent authority, it is unclear from the consultation document how direct onsite supervision will be carried out.

4. Do you support the introduction of the 'Teaching and Research' pathway?

There is a recognised global shortage of dental academics, and oral health tertiary education in New Zealand is hampered by the requirement that clinicians involved in clinical learning and teaching, as well as in research that involves the provision of oral health care to patients, be registered under an existing scope of practice. For these reasons, the Faculty strongly supports this registration pathway and notes that the "Teaching and Research pathway" proposed has been available in Australia for some time and has been very successful. The Faculty acknowledges that the University of Otago would be one of the New Zealand education institutions that would not only benefit from the registration pathway, but would also be responsible for offering employment to potential applicants, and would also be responsible for providing permanent supervision.

5. 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?

Yes, the Faculty supports 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. The Faculty also supports the submission made by the Faculty of Dentistry Oral Medicine specialists.

The Faculty agrees with their submission that:

- The historic rationale for the requirement of a medical degree is outdated, as it has been shown in every other country in the world that a dental degree, a medical degree and a qualification in Oral Medicine are not necessary for safe and competent practice of Oral Medicine;
- The requirement for a second undergraduate degree in medicine has created a barrier to training, with a direct impact on New Zealand's access to Oral Medicine services.
- Requiring those interested in pursuing training as an Oral Medicine specialist to undertake a second undergraduate degree (in medicine) imposes a significant financial burden and risks that they could instead pursue training in a medical specialty.
- Removing the requirement for a medical degree would enhance equity of access to training in Oral Medicine by removing the need to undertake a second undergraduate degree (in medicine).
- Alignment with the current Australian model, which does not require an undergraduate degree in medicine, is appropriate and evidence-based, as the Australian model has shown that graduates from an Oral Medicine training programme are safe and competent to practice without a degree in medicine.
- Further to this, Trans-Tasman equivalence and recognition are essential for equity reasons, and it is important to ensure that the pathway to training in Oral Medicine in Australia and New Zealand is the same or similar. Without alignment between Australian and New Zealand Oral Medicine training requirements, New Zealand is at a disadvantage.

Finally, not changing will have significant implications for the future of the specialty in New Zealand and for the provision of clinical services.

6. Do you support removing the requirement to register in dental technology before registering in clinical dental technology?

Yes, the Faculty supports removing the requirement to be registered in the scope of practice of Dental Technology to register in the scope of practice of Clinical Dental Technology. The two disciplines are distinct and have separate scopes of practice, and being able to practice safely and competently within the scope of Clinical Dental Technology is not contingent upon being able to practice safely and competently within the scope of Dental Technology. Indeed, it is possible for a Clinical Dental Technician to practice safely and competently without the need to practice in the Dental Technology scope of practice.

7. Do you support the proposed changes to the New Zealand registration examination requirements?

The Faculty notes that some USA licensing examinations have moved entirely to a theory-based assessment and do not have a practical psychomotor clinical skills assessment, which is a significant change from the mode of USA licensing examinations when they were gazetted in New Zealand, and from that of other gazetted registration/licensing examinations that are accepted. The Faculty therefore supports including in the Gazette that USA registration/licensing examinations for applicants who do not have a prescribed qualification must include a psychomotor clinical skills assessment.

The Faculty also notes that since July 2015, when the National Dental Examining Board of Canada took over administering the NZDREX on behalf of the Dental Council, no clinical skills assessment has been conducted in New Zealand. This is a potential barrier for overseas dentists taking the examination pathway, as, to date, every dentist who has taken this pathway has had to travel overseas for at least one component of the registration examination process. For this reason, the Faculty recommends a review of the NZDREX process to ensure that the change to the National Dental Examining Board of Canada-administered exam has not created a barrier for overseas-trained dentists who are not eligible for registration in New Zealand through any other pathway.

For the dental hygiene, dental therapy and oral health therapy examinations, the Faculty supports opening the examination back up to candidates who hold a dental degree, but would like to have more information about the administration of this examination pathway, including who provides this examination, and how and where the examination is undertaken.

8. 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?
 - a. Please tell us your feedback. When discussing multiple scopes, please indicate clearly which scope of practice you are referring to in your comment.

The Faculty supports the proposed administrative changes to the prescribed qualifications for the scopes of practice, as reflected in the draft Gazette notices. However, we question why applicants seeking registration through the examination pathway for the specialties of endodontics, oral and maxillofacial surgery, oral medicine, oral pathology, oral surgery, orthodontics, paediatric dentistry, periodontics, prosthodontics, and special needs dentistry are required to complete only two years or more of full-time equivalent postgraduate training. This appears to be outdated. We note that when some specialties were originally gazetted in New Zealand, the training length was 2 years; however, the standard training length for all the specialties above is now 3 years of full-time equivalent postgraduate training (noting that oral and maxillofacial surgery is longer).

The Faculty would also like to know whether the competencies to be published in the draft New Zealand Gazette for Teaching and Research, which pertain to the relevant dental discipline, will have their publication dates updated? Will the final version of the New Zealand Gazette for Teaching and Research include the proposed administrative changes to the prescribed qualifications for the scopes of practice included in this consultation (if they are approved)? Or will it still reflect the draft Gazette notice for Teaching and Research that contains the current competencies as published in the New Zealand Gazette?

9. Do you find the proposed fees for the new registration pathways reasonable?

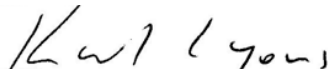
The Faculty understands that registration is a cost-recovery activity under the 'user pays' fee-setting principle and agrees that the fees for the proposed registration pathways should be set at a rate that recovers only the costs incurred to evaluate the applications.

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

The Faculty supports the Cultural Competency framework for the New Zealand context and acknowledges the proposed introduction of the "Dental Practice in New Zealand" module. This module aims to orient practitioners to the New Zealand healthcare system, its culture, regulatory environment, and the practice setting. It is noted that the proposed module is intended as an orientation course rather than an assessment of one's ability to provide culturally safe, holistic care suitable to our context. Our oral health professionals, students, and patients do need oral health practitioners who understand and can demonstrate best practices for New Zealand's diverse patient population. We do not believe that an online assessment is sufficient. Therefore, the Faculty would like to learn more about the "Dental Practice in New Zealand" module and how it will assist applicants in adapting to dental practice in New Zealand.

Thank you again for the opportunity to provide feedback. If you have any questions, please do let me know.

Ngā mihi,

A handwritten signature in black ink, appearing to read 'Karl Lyons', written in a cursive style.

Karl Lyons