

29 January 2026

Dental Council New Zealand
Level 7, 22 The Terrace
Wellington 6011

Via email: consultations@dcnz.org.nz

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

Lumino The Dentists (“Lumino”) welcomes the opportunity to make a submission to the Dental Council New Zealand (“DCNZ”) consultation on new registration pathways for overseas practitioners, and updates to existing prescribed qualifications.

Lumino is New Zealand’s largest network of dentistry providers, providing general, paediatric, restorative and specialist dentistry services. With 120 practices and mobile treatment centres located across New Zealand, we provide dental care to more than 260,000 Kiwis every year. Lumino works with more than 360 independent and employed dental services providers to provide dental services from Kaitaia down to Invercargill.

Lumino is a material part of the oral healthcare system in New Zealand, providing an estimated 15-20% of care provided across the country. We know the importance of good oral healthcare and its overall impact on personal and community wellbeing and we are committed to providing these services across the country.

The status quo

New Zealand is facing a chronic shortage of dentists and oral health professionals.

Data from Health New Zealand suggests that there is a shortage of 380 dentists nationwide,¹ with the issue particularly profound in lower socio-economic communities and rural areas.

A number of Lumino’s practices are no longer able to accept new patients because of this shortage of dental professionals. Our Oamaru practice has been without a dentist for 15 months since our long-standing clinician there retired, meaning the current patient base is not able to be serviced.

In Invercargill we have two vacancies for dentists that have been open for more than 12 months. With limited alternatives in these locations, patients are forced to travel long distances for care, or go without. These shortages are unsustainable over the longer term.

¹ <https://info.health.nz/about-us/what-we-do/planning-and-performance/health-workforce-planning/health-workforce-plan-2024-detailed-analysis-and-data/workforce-plan-profession-specific-analysis/health-workforce-plan-dentistry-analysis>

Not having enough dentists also means the dentists that we do have are overworked. Research by the New Zealand Dental Association in 2022 found that 38% of urban and suburban dentists, and 61% of dentists in rural areas, reported their workloads as being greater than they would like. This leads to poor mental health and burnout with these dentists eventually leaving the workforce, making the workforce shortages even worse.

The solution

The key to increasing the number of highly skilled dental practitioners in New Zealand is two-fold, requiring an increase in domestically trained dentists as well as attracting highly skilled practitioners from overseas.

Domestic place numbers at the University of Otago's dentistry programme are capped at 60 places, a cap that has not been meaningfully increased for more than 20 years despite a significant increase in New Zealand's population over that time.

We would support any advocacy efforts by DCNZ towards increasing this cap to encourage more New Zealand students to become dentists.

Attracting highly skilled dental practitioners from overseas is also critical to addressing the shortfall and making sure that New Zealanders can promptly access the oral healthcare services they need.

We agree that improving the efficiency of DCNZ's registration pathways is integral to attracting more overseas qualified dental practitioners to come to New Zealand.

Right now, clinicians from the majority of countries have to undertake a difficult, time consuming and expensive DCNZ assessment process in order to emigrate to New Zealand. This process costs approximately \$10,000, takes 12-18 months, is reliant on hard copy forms and materials (which are difficult to manage from overseas), and comes with little guidance on what is required.

Candidates often face long, uncertain delays after submitting their applications to DCNZ, before being failed for minor issues or a lack of clear instructions. This has become a disincentive for skilled overseas clinicians considering New Zealand as a place to practice.

The timeframe for registration is compounded by the often sequential step of then seeking an immigration visa and employment offer.

Proposed registration pathways

1. Overall, do you believe the proposed changes outlined in this document will help reduce barriers to registration for suitably trained overseas practitioners and why?

Lumino supports DCNZ's work to make New Zealand more attractive to suitably trained overseas dental practitioners by making the registration pathways more efficient.

We support the three new pathways which appear to strike an appropriate balance between maximising the number of dental professionals who can bring their skills and experience to New Zealand, while also ensuring that only those with the highest levels of skill are accepted, to ensure quality and patient safety.

In addition, Lumino recommends the following:

- DCNZ should modernise the application process to provide a more streamlined experience for applicants. Accepting applications by email or online is one obvious way DCNZ could streamline the process, improve efficiency and effectiveness, and make it easier for applicants who are overseas to participate.
- DCNZ should introduce target processing timeframes which would give applicants greater certainty of when they are likely to receive a result on their application. We note that Medical Council of New Zealand (“MCNZ”) has recently introduced “fast-track” registration pathways for doctors from the UK, Ireland and Australia, committing to processing their applications within 20 working days.
- DCNZ should provide transparency to the sector around their rejection rates and processing timeframes, so that the sector can understand how long it is likely to take to process an application and the requirements an applicant needs in order to be successful.
- DCNZ should revise and update the prescribed qualifications under the “Competent authority - qualification” pathway to include qualifications completed more recently, and qualifications earned in more countries with comparable education systems.

A number of the prescribed qualifications require the holder to have obtained them more than 25 years ago, meaning many of these potential candidates will be becoming ineligible for New Zealand residence visas due to the requirement that a candidate be aged 55 years or younger.

- DCNZ should ensure that the “Dental practice in New Zealand” module includes an English language competency assessment, to make sure these dentists are able to safely communicate with their patients in New Zealand.

2. Do you support the introduction of the ‘Competent authority registration’ pathway and why?

Lumino supports the introduction of the ‘Competent authority registration’ pathway. This pathway would support those who are registered with DCNZ’s equivalents in Australia, Ireland, the United Kingdom, Canada or the United States, and have recent clinical experience, to become registered in New Zealand.

We support the level of safeguard that DCNZ is proposing for this pathway, including the registration being contingent on a six-month period of oversight from a DCNZ-approved practitioner. We would however like to see more detail from DCNZ on how many of these DCNZ-approved practitioners there will be, and where in the country they will be located.

It is also unclear whether these DCNZ-approved practitioners would need to be on-site at the practice with the new dentist, or whether they could perform this oversight role remotely. We note that under current DCNZ regulations, supervision and oversight roles are unpaid, unless the supervisor and the dentist negotiate their own private arrangement. This can make it difficult to find dentists who are willing to perform these oversight / mentorship roles.

Without sufficient supply of DCNZ-approved practitioners, there is a risk that this requirement becomes a practical bottleneck to increasing New Zealand's supply of highly trained dental practitioners.

We ask that DCNZ consider this risk and provide mitigations before introducing this oversight requirement.

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

Lumino supports the introduction of the 'Comparable health system' pathway. This pathway would apply to dentists only and recognise dentists who are registered and practising in countries with a comparable health system infrastructure, population health outcomes, and health regulatory frameworks.

Allowing dentists from 21 countries with comparable health systems to come to New Zealand would dramatically expand the catchment area that Lumino is able to hire from, allowing us to more easily address the significant shortage of dentists our network and our industry is experiencing across the country.

We note that MCNZ considers three more health systems to be comparable with New Zealand's - Chile, Luxembourg and the Republic of Croatia. Lumino submits that these countries should also be included in DCNZ's list of comparable health systems to avoid dentists coming from these countries being unfairly penalised.

Lumino also has queries around the availability of DCNZ-approved supervisor and the process by which a dental practitioner can become DCNZ-approved. Given that applicants using this pathway require a DCNZ-approved practitioner to be available to supervise them on-site for 12-months, it is most likely that the best person to provide this supervision would be another dentist with full registration already employed at the practice.

Lumino recommends the following:

- DCNZ should include Chile, Luxembourg and the Republic of Croatia on the list of comparable health systems, bringing DCNZ's list of comparable health systems into parity with MCNZ's list.
- The process for becoming a DCNZ-approved supervisor should be straightforward and inexpensive, allowing DCNZ to verify the seniority and experience of the supervisor commensurate with the role they will be expected to perform, while also preventing this requirement from becoming a bottleneck to bringing in highly skilled dental professionals from overseas.

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

Lumino supports the introduction of the 'Teaching and research' pathway, which will help to bolster the training of New Zealand's future dental workforce.

This pathway would be particularly useful in the context of any efforts to increase the cap on the number of domestic students who study dentistry at the University of Otago each year. An increase in students would necessarily require an increase in teaching staff, which could be facilitated through this pathway.

We understand that teaching institutions are experiencing a shortage of teaching staff, and that the University of Otago has had to drop some courses including maxillofacial and paediatric dentistry, due to lack of faculty. Making it easier to bring highly skilled dental professionals to New Zealand for the purpose of teaching and research should go some way to alleviating this particular shortage. It should also help to ensure AUT's Oral Health programme is able to operate fully staffed.

Proposed changes to existing prescribed qualifications

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, and why?

Lumino does not engage many oral medicine specialists and so this point is not directly relevant to our practice.

However, Lumino generally supports DCNZ taking steps to bring New Zealand into line with comparable health systems. This allows New Zealand to take maximum advantage of the global workforce and prevents our dental care system from being considered out-of-step with comparable systems internationally.

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

Lumino supports DCNZ's proposal to streamline the registration of clinical dental technicians by removing the existing requirement that they first register as general dental technicians.

We agree with DCNZ's assessment that this change will remove unnecessary registration barriers to becoming a clinical dental technician, without posing any significant risk.

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

Lumino agrees that practical assessments are an important part of a dentist's training, and agrees with DCNZ's proposal to make sure that those who are seeking to come to New Zealand have the requisite hands-on knowledge and skills to do their jobs.

We therefore support DCNZ's proposal to require applicants coming from the United States to have completed a psychomotor clinical skills assessment.

Lumino also supports DCNZ's proposal to enable dentists to again sit dental hygiene, dental therapy and oral health therapy examinations, should they desire to do so.

As regards the USA licensing examinations issue, Lumino recognises the importance of dentists who wish to come to New Zealand having considerable hands-on experience to make sure they have the skills to do their jobs safely and effectively and agrees that, for those who are seeking to use their licensure exam as evidence of their capability as a dentist, that licensure exam should have a hands-on component.

For the avoidance of doubt, we do not believe this restriction should be placed on those who are seeking to use the "Competent authority – registration" pathway. If a dentist is seeking to come to New Zealand from the United States, with CODA accreditation, and having practised there successfully for at least 33 of the past 48 months, we believe that experience should be more instructive as to their competence as a dentist than their licensure examination.

8. Do you have feedback on the proposed administrative changes to the prescribed qualifications for any of the scopes of practice, as reflected in the draft gazette notices? Please include which scope of practice/s your feedback relates to.

As emphasised earlier in our submission, Lumino requests that DCNZ revise and update the prescribed qualifications listed under the "Competent authority -

qualification" pathway to include qualifications completed more recently, and qualifications earned in more countries with comparable education systems.

A number of the prescribed qualifications require the holder to have obtained them more than 25 years ago, meaning many of these potential candidates will be becoming ineligible for New Zealand residence visas due to the requirement that a candidate be aged 55 years or younger.

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

Yes, Lumino considers the proposed fees for the new registration pathways to be reasonable. We note these are considerably cheaper than the costs incurred by applicants going through the existing pathways to registration for overseas trained practitioners.

Conclusion

Thank you for taking the time to consider our submission. Please do not hesitate to get in touch if you have any questions.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "CK".

Craig Kirkland
General Manager
Lumino