



Page 2: About your submission

Q1

First name

Gareth

Q2

Last name

McMurdo



Q4

New Zealand

Are you primarily based in New Zealand or overseas?

Q5

Company/organisation name

New Zealand Institute of Dental Technologists

Q6

Professional body

In what capacity are you making this submission?

Page 3: About your submission

Q7

Respondent skipped this question

What is your profession?

Q8 Respondent skipped this question

Please enter your Dental Council Person ID, if applicable

Page 4: Proposed registration pathways

Q9 Somewhat

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

Q10

Please tell us why:

NZIDT agrees that the proposed changes may reduce barriers for suitably trained overseas practitioners. However, barrier reduction must not come at the expense of qualification integrity, workforce development, or the long-term viability of smaller professions. NZIDT is concerned that the cumulative effect of the proposals, particularly when considered alongside increased levies and fees, may be perceived as lowering entry thresholds while increasing the cost burden on the existing workforce.

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

Q11 Partially 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:

NZIDT acknowledges that the Competent Authority Registration pathway is more constrained than it may appear at first reading, particularly when the eligibility criteria and footnotes are read together.

The requirement for current, full, unrestricted registration with a Council-recognised competent authority, combined with extended recent practice requirements, provides an important safeguard. NZIDT considers it essential that this distinction is clearly communicated to avoid misconceptions that the pathway represents unrestricted or automatic entry to registration.

Dental Technology vs Clinical Dental Technology

NZIDT recognises that, under the current regulatory framework, individuals may undertake dental technology work in New Zealand provided they do not use the protected title of "dental technician", and that registration in the dental technology scope primarily functions as a mechanism for title protection rather than an exclusive right to practise.

Clinical dental technology, however, represents a significantly higher level of responsibility and public risk. NZIDT notes that entry to the New Zealand accredited clinical dental technology programme remains qualification- and experience-based, with consistently more applicants than available places. This academic screening process currently provides a critical safeguard.

NZIDT expresses caution regarding any expansion of the Clinical Dental Technology Competent Authority Registration pathway beyond Australia and recommends that any such expansion be staged, evidence-based, and subject to ongoing workforce monitoring.

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

Q13

No opinion/NA

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

Q14

Respondent skipped this question

Please tell us why:

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

Q15

No opinion/NA

Do you support the introduction of the 'Teaching and research' pathway?Click to learn more about the proposed pathway

Q16

Respondent skipped this question

Please tell us why:

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

Q17

No opinion/NA

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

Respondent skipped this question

Please tell us why:

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

Q19

Oppose

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:

NZIDT recognises that, under the current regulatory framework, individuals may undertake dental technology work in New Zealand provided they do not use the protected title of “dental technician”, and that registration in the dental technology scope primarily functions as a mechanism for title protection rather than an exclusive right to practise.

Clinical dental technology, however, represents a significantly higher level of responsibility and public risk. NZIDT notes that entry to the New Zealand accredited clinical dental technology programme remains qualification- and experience-based, with consistently more applicants than available places. This academic screening process currently provides a critical safeguard.

NZIDT expresses caution regarding any expansion of the Clinical Dental Technology Competent Authority Registration pathway beyond Australia and recommends that any such expansion be staged, evidence-based, and subject to ongoing workforce monitoring. NZIDT has carefully considered the proposal to remove the requirement to be registered in the dental technology scope of practice prior to registering in clinical dental technology.

NZIDT’s primary lens in responding to this proposal is patient welfare and public safety, rather than administrative consistency or workforce convenience.

While clinical dental technology is recognised as a standalone profession under the HPCAA, NZIDT considers that the prerequisite of dental technology registration has played an important role in formally recognising the foundational technical competence that underpins safe clinical practice. Clinical decision-making in this scope relies not only on chairside skills, but on deep technical judgement developed through dental technology training and professional accountability.

NZIDT is concerned that removing this prerequisite as a regulatory default risks weakening the system-wide safeguards that protect patients over the long term. While entry to the New Zealand accredited clinical dental technology programme is currently qualification- and experience-based, NZIDT considers that patient safety should not rely solely on academic gatekeeping by a single institution. Regulatory settings should reinforce foundational competence explicitly, rather than assume it will always be adequately assessed elsewhere.

NZIDT also notes that the Council has acknowledged concerns regarding the long-term financial sustainability of the dental technology profession and other smaller professions with decreasing or stagnant numbers. NZIDT considers that removing formal regulatory recognition of dental technology as the foundational pathway into clinical dental technology may unintentionally exacerbate these sustainability risks, with downstream impacts on workforce capability and patient care.

Accordingly, NZIDT does not support removal of the prerequisite in its current form. If Council proceeds with this change, NZIDT strongly recommends that alternative safeguards be clearly articulated within the prescribed qualifications or registration policy to ensure that:

- foundational dental technology competence is explicitly recognised;
- patient welfare remains central to registration decisions; and
- responsibility for assuring competence is not shifted entirely away from the regulatory framework.

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

Q21

No opinion/NA

Do you support the proposed changes to the New Zealand registration examination requirements? [Click to learn more about the proposed changes.](#)

Q22

Respondent skipped this question

Please tell us why:

Page 12: Proposed administrative changes to the prescribed qualifications

Q23

Clinical dental technology

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.

NZIDT acknowledges the user-pays principle underpinning the proposed fees. However, the Institute is concerned about the cumulative impact of increased levies, expanded regulatory monitoring costs, and pathway changes on smaller professions with limited practitioner numbers.

NZIDT encourages the Council to consider how fee setting, workforce planning, and qualification recognition interact, particularly in relation to professions already identified as having sustainability challenges.

6. Conclusion

NZIDT supports transparency, proportionality, and workforce sustainability. The Institute asks that the Council proceed cautiously with changes affecting clinical dental technology registration, explicitly protect the value of formal dental technology qualifications, and continue meaningful engagement with the profession as these proposals are refined and implemented.

NZIDT remains committed to working constructively with the Dental Council of New Zealand to ensure safe, sustainable, and high-quality oral health services for the New Zealand public.

Page 13: Proposed fees for the new registration pathways

Q25

No

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

Q26

Please tell us why or why not?

NZIDT acknowledges the user-pays principle underpinning the proposed fees. However, the Institute is concerned about the cumulative impact of increased levies, expanded regulatory monitoring costs, and pathway changes on smaller professions with limited practitioner numbers.

NZIDT encourages the Council to consider how fee setting, workforce planning, and qualification recognition interact, particularly in relation to professions already identified as having sustainability challenges.

Page 14: Thank you for your time

Q27

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

The New Zealand Institute of Dental Technologists (NZIDT) supports the Dental Council of New Zealand's objectives of improving workforce sustainability, reducing unnecessary regulatory barriers, and applying proportionate, risk-based regulation in accordance with sections 12 and 13 of the Health Practitioners Competence Assurance Act 2003 (HPCAA).

NZIDT supports improved transparency and clarity in registration pathways and recognises the need to address workforce pressures across the oral health sector. However, NZIDT has significant concerns regarding the potential devaluation of formal dental technology qualifications, the long-term sustainability of the dental technology workforce, and the risk that certain proposed changes may unintentionally undermine patient welfare over time.

This submission focuses on the proposals most relevant to dental technology and clinical dental technology and is offered constructively to support public safety, professional standards, and a sustainable New Zealand workforce.
