



Feedback on Proposed Comparable Health Systems Pathway for Overseas Dental Practitioners

To Consultations <Consultations@dcnz.org.nz>

Dear Dental Council of New Zealand Team,

I am writing to provide feedback on the proposed "Comparable Health Systems" registration pathway for overseas dentists, and I would like to first acknowledge DCNZ's efforts in creating alternative, more flexible pathways that recognise overseas training and experience while maintaining patient safety in New Zealand.

I strongly support the principle behind the Comparable Health Systems pathway. However, I would like to raise a concern regarding the proposed requirement that applicants must have completed at least 33 months of clinical practice (working 20 hours or more per week) within the 48 months immediately prior to application.

A number of internationally trained dentists from recognised jurisdictions, including Hong Kong and the UK, have already relocated to Canada to pursue the NDEB Equivalency Process, which has historically been the only viable pathway to dentist registration in New Zealand. The NDEB equivalency process is lengthy, complex, and typically takes several years to complete. During this period, many dentists inevitably experience gaps or reductions in clinical hours, not due to disengagement from the profession, but because they are actively undertaking examinations, preparation courses, and regulatory requirements aimed specifically at achieving New Zealand registration eligibility.

In this context, applying a strict "33 out of 48 months" recent clinical experience requirement may unintentionally disadvantage dentists who have been proactively and legitimately working towards New Zealand registration through the NDEB pathway. This could be perceived as inequitable, particularly as these individuals committed to this route at a time when the Comparable Health Systems pathway was not yet available.

As a possible alternative or supplementary safeguard, I would respectfully suggest that DCNZ consider recognising relevant postgraduate dental qualifications, such as MRACDS(GDP) from Australia and MFDS from the UK, as part of the assessment framework. Comparable medical regulators, including the GMC (UK) and the Medical Board of Australia, have historically taken recognised postgraduate qualifications into account when assessing international medical graduates for registration pathways.

In exchange for such recognition, and to further strengthen patient safety, DCNZ could consider extending the period of supervised practice to 18–24 months for applicants entering through this pathway. This approach would balance public protection with fairness, acknowledge advanced postgraduate training, and recognise the realities of lengthy equivalency processes already endorsed by New Zealand.

Thank you for the opportunity to contribute to this consultation. I appreciate DCNZ's openness to stakeholder feedback and its ongoing commitment to developing robust, fair, and forward-looking registration pathways for the dental workforce.

Regards,
Albert Yip