



Page 2: About your submission

Q1

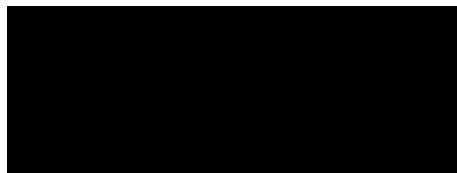
First name

Hayley

Q2

Last name

Hawkins



Q4

Are you primarily based in New Zealand or overseas?

Overseas,

If overseas, where?:

Australia

Q5

Company/organisation name

Australian Dental Council

Q6

Overseas accrediting or registration/licensing 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**Yes**

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

Q10

Please tell us why:

The Australian Dental Council (ADC) supports the proposed approach to remove unnecessary barriers and streamline registration for suitably trained overseas practitioners. We are supportive of reform that improves efficiency and workforce mobility while maintaining public safety.

As an accreditation authority, the ADC ensures dental practitioners meet the high standards expected in Australia. We recognise the practical benefit of removing unnecessary barriers and agree that a streamlined registration process strengthens workforce responsiveness and supports improved access to dental care.

The ADC recognises that, under the Trans-Tasman Mutual Recognition Arrangement, registered dental practitioners in either jurisdiction can work in both countries. The ADC notes there is a wider regulatory reform agenda and advocates for harmonised registration requirements across both countries. The ADC recommends the Dental Council (New Zealand) and the Dental Board of Australia (DBA) continue to collaborate on harmonised pathways to registration.

The ADC also notes the importance of clear, transparent and appropriate supervision requirements to support public safety, and considers this to be an important strength of all the pathways.

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

Q11**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:

The ADC agrees that the competent authority registration pathway recognises practitioners who have demonstrated their competence through practice in a recognised competent authority jurisdiction, even where their original qualifications are not accredited in that jurisdiction. This opens additional, appropriate routes to registration.

The ADC notes, however, the need to ensure that:

- Supervision requirements are applied consistently, and
- supervision processes are clearly articulated, transparent, and not unduly burdensome for practitioners or employers.

Again, the ADC considers the supervision requirement to be a strength of the proposal.

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

Q13

Support

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

Q14

Please tell us why:

The ADC supports this pathway in principle.

The ADC notes that the proposed approach aligns with similar frameworks used by the Medical Council New Zealand. Recognising dentists from jurisdictions with comparable regulatory systems and oral health outcomes is a reasonable and proportionate framework.

The ADC encourages DC(NZ) to maintain an ongoing review of the comparability list as health systems evolve and to ensure that supervisory expectations remain proportionate to risk.

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

Q15

Support

Do you support the introduction of the 'Teaching and research' pathway? [Click to learn more about the proposed pathway](#)

Q16

Please tell us why:

The ADC supports this pathway.

This pathway exists in Australia and introducing it may help strengthen the Trans-Tasman academic workforce and support quality oral health education in both countries, particularly in the context of global shortages of oral health academics. The limitation on independent clinical practice is appropriate and aligns with international approaches, including those in Australia.

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

Q17

Support

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

Please tell us why:

Australia does not require a medical degree for oral medicine specialist registration, and oral medicine programs embed relevant medical training and clinical experience within the postgraduate oral medicine curriculum. The proposal therefore allows greater alignment between Australian and New Zealand requirements and reduces unnecessary barriers to registration.

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

Q19

Support

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:

The ADC supports this change and again, this change aligns with the Dental Prosthetists profession in Australia.

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

Q21

Oppose

Do you support the proposed changes to the New Zealand registration examination requirements? Click to learn more about the proposed changes.

Q22

Please tell us why:

The ADC does not support the proposed changes.

Under the proposed changes, overseas trained dentists could enter New Zealand and obtain registration in scopes such as oral health therapy or dental hygiene. If they meet the proposed examination requirements, they may then seek recognition in Australia through Trans-Tasman Mutual Recognition.

This presents a direct regulatory risk.

The proposals represent a substantial departure from the regulatory framework that governs dental practice in Australia. Although these practitioners may have broader dental training, they would be permitted to practice in Australia only within the limited scopes defined for oral health therapists and dental hygienists.

This misalignment increases the likelihood of practitioners working outside their authorised scope once in Australia.

The Australian regulatory framework does not allow an individual trained as a dentist to undertake an assessment that results in registration in an alternate division, such as oral health therapy or dental hygiene.

The proposals would therefore create a significant regulatory inconsistency between New Zealand and Australia on a core principle of practitioner registration.

Page 12: Proposed administrative changes to the prescribed qualifications

Q23

Respondent skipped this question

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.

No further comments

Page 13: Proposed fees for the new registration pathways

Q25

No opinion/NA

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

Q26

Respondent skipped this question

Please tell us why or why not?

Page 14: Thank you for your time

Q27

Respondent skipped this question

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