



5th August, 2010.

The Committee Secretary  
Senate Education, Employment and Workplace Relations Committee  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Secretary,

### **Inquiry into Industry Skills Councils**

The Equine Dental Association (EDAA) is grateful for the opportunity to make a submission to the Education, Employment and Workplace Relations Committee with respect to their Inquiry into Industry Skills Councils.

### **Background information on the EDAA**

The Equine Dental Association of Australia currently has 35 members throughout Australia, all of whom earn a full time living as Professional Equine Dental Technicians. The role of dental technician is to deliver humane and cost effective dental maintenance to a wide variety of horses. As a result, members of the EDAA work with horses from some of the most famous stables and well known horse owners throughout Australia and overseas.

Members of the EDAA must have successfully completed the course- Certificate IV in Work Practices for Equine Dental Technicians 21805 VIC. This course is accredited with the Victorian Qualification Authority following National Guidelines and is delivered by the Registered Training Authority (RTO) South West TAFE. The course takes approximately 18 months to complete (full-time study) and currently trains 2 students at a time. This is well regarded as the most extensive training regime in the world today in comparison to most other courses which are as short as a few weeks long.<sup>1</sup>

All members make a full-time living working in co-operation with members of the Veterinary profession and other aligned health care providers whilst observing existing state laws, regulations and codes of practice. It is compulsory for members of the EDAA to be comprehensively insured and abide by the Constitution and Code of Conduct<sup>2</sup> of the EDAA.

Within Australia there are approximately 90 people who would make a full-time living as an equine dental technician<sup>3</sup> and a further 120 people who can only gain partial employment (due to geographical or economical constraints) or are semi-retired. This is a micro-industry which is highly competitive and one in which it is difficult to gain substantial market share due to its "fickled" nature.

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<sup>1</sup>"Hoofbeats" article by Wendy Elks

<sup>2</sup> EDAA Code of Conduct (Private & Confidential)

<sup>3</sup> Letter from the Edge

## **Response to the Terms of Reference of the Senate Inquiry into Industry Skills Council.**

**TOR (a)** The Equine Dental Association of Australia has many concerns over the recent AgriFood Skills Australia attempt to develop a National Qualification for Equine Dentistry. There has been no “environmental scan” carried out which would normally be the starting point for any training package development. This scan establishes the needs, current employment levels and projected employment potential of an industry. The main result of the ongoing development of a National Training Package should be to provide access to meaningful employment of people who undertake the required training. This is one industry where there is clearly no skills shortage. Therefore it is our view that development of this qualification represents a questionable use of public funds.

Apparently there have been many meetings since 2006 with other stake holders to develop a draft document. The EDAA has only attended one meeting in August 2008 and a recent telephone conference in June 2010. We have raised our concerns to the co-ordinator of the package development<sup>4</sup> and have written a further three letters to the CEO of AgriFood Skills with no response.

The EDAA represents approximately one third of the professionals who work in Australia and yet we have been excluded from most discussions about our industry and our concerns over the content of the proposed training package have been ignored.

**TOR (b)** Our attempts to communicate with AgriFood Skills have repeatedly failed. We cannot establish who AgriFood Skills are actually answerable to. The members of the EDAA contribute considerable taxes to the Federal Government and the money used in this venture is ultimately public money. Surely we must have some say over the future direction of our own industry especially when we represent such a large proportion of the working professionals and already successfully run a nationally accredited training course for this highly specialised career. The package development so far is neither collaborative nor inclusive and anything that has been developed shows a lack of thorough industry consultation.

**TOR (d)** The EDAA would like to know exactly how much public money has been spent so far in the National Training Package development for equine dentistry. We would also like to know if there is any tendering process for the engagement of consultants to develop the training packages on behalf of the AgriFood Skills Council. If AgriFood Skills Australia claim to look for the most value for money there must be some way of assessing this claim other than relying on self evaluation.

**TOR (g)** The EDAA has tried to remain a constructive participant in the development of a National Training Package for equine dentistry however there is little communication from AgrFood Skills. Our concerns over some of the proposed content of the Training Package especially in relation to performing quasi-veterinary procedures and potentially compromising horse welfare and longevity have been ignored. What should be a straight forward process of identifying the required skills to be a professional equine dental technician has evolved into a multi-faceted service provider who is a pseudo veterinarian, saddle fitter, myofunctional therapist, horse trainer, soundness expert and dentist.

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<sup>4</sup> Letter to Michelle Jackson September 2008

This has been a long winded and undoubtedly very costly process with no anticipated agreed outcome for the association, which also questions the contribution of the qualification to animal welfare issues. Many of the proposed competencies in the Training Package are procedures which are already regulated by existing State Acts, Regulations and Codes of Practice yet the proposed document gives lip service to the claim of observing existing State Acts of Parliament. The document is contradictory, poorly written and although it will exist in an "Animal Welfare" package there are several proposed procedures which have no scientific basis. The main purpose of routine dental care for horses is to improve their longevity and wellbeing. The implementation of the proposed Training Package would create an oversupply of equine dental technicians with a skills set that would not necessarily improve the well being of the horse.

In conclusion the EDAA is extremely concerned about the outcomes from the Training Package development. The process so far has been poorly managed from our perspective and we have not been included in much of the consultation. We would happily send a suitable representative to appear at the Senate Inquiry.

Yours faithfully,

**EQUINE DENTAL ASSOCIATION OF AUSTRALIA INC.**

**Mark Burnell**  
**President**

Addendums:

1. "Hoofbeats" article by Wendy Elks
2. EDAA Code of Conduct (Private & Confidential) – Separate Attachment
3. Letter from the Edge
4. Letter to Project Co-ordinator, Michelle Jackson Sept 2008



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**EDAA submission to Inquiry into Industry Skills Councils : Addendum 2**

**Equine Dental Association of Australia Inc.**

**Code of Conduct  
Is Private & Confidential  
And attached as a separate document**

**Bureau of Animal Welfare,  
Draft Code of Practice for  
the Welfare of Horses  
Revision Number 1, Sept 2008.**

Even the Bureau of Animal Welfare have weighed into the debate with their draft Victorian Horse Welfare Code of Practice in which they are recommending the following:

*A person must not provide any dental treatment to a horse that causes damage or injury to the horse, or results in inability of the horse to eat.*

*Use of motorised tools on horses' teeth must only be performed with the horse adequately sedated under veterinary supervision.*

*Drugs used for sedation must be administered or dispensed by a veterinary practitioner.*

*A person must not attempt a category of dental procedure that they are not competent to perform as defined in Appendix 5-Dental procedures.*

believes there is a shift, albeit gradual, towards this methodology. "About 60 percent of my work these days is WOM."

Following a lifetime involvement with horses in a variety of disciplines, current Victorian Thoroughbred owner/trainer, Miranda Cox is convinced that a well maintained mouth is essential to a horse eating efficiently and maximising its performance under saddle. "I have always used equine dentists who use hand tools because I have found this to be an effective way of achieving a well maintained mouth with the least intrusion to the horse both mentally and physically.

"I would not try WOM as I am not interested in switching to a method requiring sedation, more time and more expense than the method I currently use."

Sydney 2000 Olympic eventer and current equestrian eventer and coach, Amanda Howell says equine dental health is extremely important in maintaining the health and well being, and ultimately the performance of your horse. Whilst she still uses a traditional equine dentist, in the last two years she has started to use the WOM methodology more often, but only performed by a vet. "My vet and I discussed the pros and cons of both methods and I now believe that the use of power tools in combination with sedation performed by a vet who specializes in this form of dentistry is my preferred choice."

Equine dentist Ian Wharton used the traditional method for many years. He is now a total convert to WOM dentistry believing traditional dentistry does not work. "WOM is about balancing the horse's mouth by reducing and aligning incisor teeth if necessary, removing ramps and wolf teeth

all so the horse can chew more effectively with its molars".

Education helped Ian realise that everything he had done as a traditional equine dentist, using hand tools, knocking some rough edges off here and there just to keep a horse comfortable had been a complete waste of time because he didn't understand the function of the horse's mouth.

Dr Graham Jeffrey of the Cranbourne Equine Hospital and Referral Centre, acknowledges that traditional dentists can do less damage than WOM practitioners because of the tools they use. "I think it's not so much about what they do but more often what they don't do.

The sharp points which are what traditional dentists treat are only the beginning of a problem which may include various forms of pathology that can develop over time in the mouth and if not rectified can result in infection, gingivitis, involvement of the periodontal ligaments and subsequent loss of teeth. The horse's chewing cycle is compromised resulting in pain and discomfort for the horse, weight loss, poor digestion and poor performance. A WOM practitioner really needs to understand pharmacology, radiology and anatomy and how all these factors fit together.

For further information visit:  
Equine Dental Association of Australia Inc  
[www.equinedental.com.au](http://www.equinedental.com.au)  
College of Equine Dentistry Australia  
[www.equinedentistry.com.au](http://www.equinedentistry.com.au)  
International Association of Equine Dentists  
[www.iaedonline.com](http://www.iaedonline.com)  
Department of Primary Industries  
[www.dpi.vic.gov.au](http://www.dpi.vic.gov.au) (for Draft Horse Welfare Code)  
Advanced Equine Dentistry  
[www.advancedequinedentistry.com.au](http://www.advancedequinedentistry.com.au)



Any lay person can become an equine dentist without qualification, however it is gradually developing into a specialist field despite still being in relatively early stages. Veterinarians have always studied and carried out dentistry as part of their training, but an increased understanding of the importance of dental care to a horse's welfare and performance means there is a growing demand - and need - for specialist equine dentists.

The craft of equine dentistry has traditionally been learned by apprenticeship, much like blacksmithing (in most countries this is still almost completely the case). Today, there are various equine dental colleges and organisations around the world - typically run privately rather than in conjunction with equine hospitals or universities - offering a range of qualifications. A quick Web search shows that syllabuses vary greatly in competency requirements and topics studied as well as training length - some for as little as a few weeks! It's therefore not unreasonable to assume that, as in

## Dental Education and Training

other new and unregulated therapies, there may be broadly varying results, with opportunities for inexperienced or incompetent people to practice this important procedure on horses - which have no choice but to submit.

For veterinary surgeons that wish to further develop their dentistry skills, courses available range from short intensive courses - just a few days - to longer post-graduate studies.

The more advanced 'non veterinary' colleges around the world require hundreds of hours of field experience, study and training before even the first level of experience can be gained. Additionally, though not a direct comparison, human dental qualifications take seven years. Therefore it may be argued that a weekend or intensive course is not likely to be sufficient.

Most importantly, up until very recently, there has been no nationally recognised accreditation available for the profession. As such, equine dentistry has not been a licensed occupation. A number of leading equine dentistry organisations and associations have worked toward identifying and establishing essential skills and knowledge required for a national accreditation resulting in just one, offered by the Equine Dental Association of Australia (EDAA).

The EDAA is the oldest horse dentist association

in Australia and is now the only accredited training organisation recognised by a university and the racing industry. EDAA members are the only fully nationally accredited and insured horse dentists in Australia. Completion of the course (through the University of Melbourne, or more recently, Racing Victoria) gains Certificate IV in Work Practices for Equine Dental Technicians. The course length is approximately 15 -18months (or one year full time) and is comprised of lectures, field trips, practicum's and extensive supervised industry experience in traditional methods (EDAA does not endorse the use of power tools for equine dentistry). To complete the course, a full fee of approximately \$20,000 and a full set of tools and equipment is required by the final assessment, at the cost of the trainee. Students learn the different aspects of dental technician practices, horsemanship, customer service and business management. For more information visit [www.racingvictoria.net.au](http://www.racingvictoria.net.au) or call 03 9258 4332.

**Footnote:** At the time of printing, the Northern Territory Veterinary Surgeons Act is being reviewed, which may mean that only vets will be able to perform dentistry. Horse dentists with many years experience would no longer be allowed to perform this process. If successful, it is feared that this policy will transfer across the country.

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**EDAA submission to Inquiry into Industry Skills Councils : Addendum 3**



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Att: Mark Burnell  
President of:  
Equine Dental Association of Australia

Dear Mark

Further to our discussion of last week regarding information which may help with the EDAA's submission to the AgriFoodSkills Council, I have gone through our data base to ascertain the number of lay dentist's and Veterinary practitioner's who would and could be deriving a full time income from Equine dental work, and those that perform equine dentistry on a part time basis or as part of another service with the equine industry.

As you are aware our business supplies product all over the world and we are the largest supplier of equine dental equipment in Australia. Over the last 9 years we have made it our aim to learn more about who does equine dental work and how.

Our data base has nearly 300 people or business's whom we supply, or have made inquiry regarding our dental products, of this number we could with some certainty say that there would be between 80 to 100 of these making a stand alone income from equine dentistry in Australia. The number of people doing dentistry as part time or add on to there business's is harder to gauge, but that could also run into the same sort of numbers, if not more. This is our data base only and we make no comment on there training or skill levels in this industry.

Also there are several other business's providing training and supplying equipment in Australia, there data bases could also show more dentists or vets making a living with in this industry that do not appear on our system.

I hope this information is of use to you and your colleagues in making decision's regarding this important industry

Sincerely

Tim McMahon  
The Edge Equine



**EDAA submission to Inquiry into Industry Skills councils : Addendum 4**

**COPY**

5<sup>th</sup> September, 2008.

Ms Michelle Jackson  
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Equine Dental Technician Industry Reference Group  
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CREMORNE NSW 2090

Email : [mjackson@allevents.com.au](mailto:mjackson@allevents.com.au)

Dear Michelle,

Peter Beck (President Equine Dental Association of Australia inc.) and I were present at a meeting on Saturday the 23<sup>rd</sup> of August at Richmond TAFE believing we were to participate in a Reference Group for the development of National Training Standards for Equine Dental Technicians. Instead, we were present at a vague course writing exercise for which a lot of the suggested content we cannot support, do not endorse and had no part in the development of.

The ultimate emphasis of the proposed document from this meeting does not have the best interests of horse welfare, the profession of Equine Dentistry, the rights of horse owners nor the continued positive working relationship of the Veterinary Profession at heart. There are many components which are similar to the Equine Dental Association of Australia Course: 21805 VIC Certificate IV in Work Practices for Equine Dental Technicians. This is a Nationally Accredited Course.

However there are some proposed units of competency which are of grave concern to the Committee and Membership of the Equine Dental Association of Australia. In particular, we are concerned with the suggested ability of Equine Dental Technicians to carry, prescribe and administer sedatives, tranquilisers, nerve blocks and reversing agents! For any State Department of Primary Industry to permit lay-people the free access to this array of drugs would take a major reworking of the respective Drug Act and the Veterinary Act, which we believe is an unlikely scenario. This could potentially compromise the role and public perception of the Equine Dental Technician. There may be existing permission for lay-people to have access to this group of drugs (National Deer Velvet Accreditation Scheme) but that is hardly an opportunity to draw a parallel to the role of a service provider such as an Equine Dental Technician. The reason the other attendees at the Industry Review Group wish to have access to the restricted drugs is also questionable. In order to perform any procedure on any animal there must be an obvious benefit to the ongoing welfare of the animal being treated. This should be done with the hindsight of solid scientific evidence. Where is the scientific data supporting their claims that what they intend to do to a sedated horse will improve its longevity?

The Environmental Scan is meant to explain the rationale for the profession. The complete answers to many obvious questions should be given :

- How many horses are there?
- Why do people want their horse's teeth done?
- Who works in this industry?
- How many are full-time?
- How many are part-time?
- What does the term full-time and part-time entail?
- What qualifications or training is currently available?
- Who provides this training?
- How long is this training?
- Is this training Nationally Accredited?
- Is the training conducted at a Registered Training Organisation using Accredited Trainers and Assessors?
- What is the through-put of all the training programs?
- What are the employment opportunities for those who complete any training?
- What number of practising Equine Dental Technicians could the Horse Industry sustain?

The Environmental Scan should use published research documents such as : 'Equine Dentistry in Victoria' by Amy Holland 242306; University of Melbourne 2007, and approach instrument supply companies such as "The Edge" from Bendigo, Victoria. to gain a true indication of who is currently working in the industry. The role of the part-time Equine Dental Technician needs to be established but they should not be consulted in the formulation of any guidelines for this industry. From the documentation which I have received from you so far I can see no evidence of any substantial Environmental Scanning and the Equine Dental Association of Australia has not received any requests from your group to provide any information.

A functional analysis which is representative of the Equine Dental Technicians Industry is essential before any course writing can begin. It is important that the Reference Group speaks on behalf of the whole industry of Equine Dental Technicians, and in particular practitioners who earn a full time living from the profession. Due to the short notice of meetings and insufficient lead-time to read course material and meeting documentation, Peter Beck and I have only been able to attend one meeting! Does the Representative Group want to see a majority of full-time practising Equine Dental Technicians?

Further consultation with representatives from horse training and owning organisations, the Veterinary Profession, the Department of Primary Industry and the Bureau of Animal Welfare should be undertaken before you claim the Functional Analysis has been validated by the Horse Industry at large.



To quote Amy Holland 242306, the author of "Equine Dentistry in Victoria" University of Melbourne, 2007.

From page 63

**RECOMMENDATIONS TO THE INDUSTRY**

Qualification appears to be one of the biggest problems facing the industry by the number of responses by both clients and practitioners. Regulation of those practicing dentistry also seemed to be a big issue. Clients felt there are "still too many uneducated people and ignorant Vets handling dentistry" and the industry "needs to be regulated so only qualified people are allowed to perform". One client believed that we "need to have an easily available list of qualified/reputable people so people can ensure they use someone that will do a good job, not just a 'back-yard' dentist". A practitioner felt that the problem comprised of "dentists who say they have a qualification and in fact it's not recognised, backyard horse dentists and qualified horse dentists performing substandard work".

Where is the Functional Analysis of this project?

In conclusion the Committee and Members of the Equine Dental Association of Australia do not collaborate with many of the positions taken by a large part of the Review Panel. The skills and Knowledge Profile does not give a representative view of the major service providers in this profession. Our membership provides routine dental care to huge number of horses within Australia. We work as much as possible in co-operation and collaboration with many other professionals within the Horse Industry including Veterinarians, Trainers, Coaches and Nutritionists. The direction this Training Package is taking does not reflect what is happening to the majority of horses in Australia and it would be misrepresenting the views of the Equine Dental Association of Australia to present the findings of the Review Panel and claim we played any large part in their content. I have included a list of other Bodies and Government Departments who I believe should know of our position regarding the work done by the Industry Review Panel.

Yours faithfully,

**EQUINE DENTAL ASSOCIATION OF AUSTRALIA INC.**

**Mark Burnell.**

**Course Coordinator & Vice-President**

cc : Dr. Barry Smyth (AHIC President)  
Dr. Dave Rendell (AVA President)  
Dr. Steve Tait (BAW, DPI Vic)  
Arthur Blewitt (AFSC)  
Carrie Roche (DEEWR)  
Jim Aliferis (DPI NSW)  
Julie Feidler (AFSC)