



# The Australasian Association for Equine Dentistry Incorporated

Promote and Pursue Worlds Best Practise in Equine Dentistry

Committee Secretary  
Dr Shona Batge  
Senate Education, Employment and Workplace Relations Committee  
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Australia  
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## Re: Submission Number 61- EDAA Inc. Mark Burnell

Dear Dr Batge,

We have recently become aware of a submission by the EDAAInc President, Mr. Mark Burnell to the Senate Education, Employment and Workplace Relations Committee Enquiry into Industry Skills Councils.

The Australasian Association for Equine Dentistry Inc (AAED Inc) is a not for profit incorporated Association with the primary function of pursuing the development of National Accreditation and Australian Quality Training Framework (AQTF) competency based training for Equine Dental Providers in Australia.

The AAEDInc currently represent 38 members who reflect a broad spectrum of full time, part time and student equine dentists, with members living or working in every state and territory of Australia. Members have received training at a variety of facilities both within Australia and also overseas. The AAEDInc has working relations with both the World Wide Association of Equine Dentistry – Australasia Inc and also the International Association for Equine Dentistry which together have some 300 plus members world wide including both veterinarians and non veterinarians.

We would like to make the following comments regarding Mr. Burnell's letter to the Enquiry –

1/ The Victorian registered Certificate IV course delivered by Mr. Burnell is a privately owned course costing \$20,000 per student to complete with only 2 new students each year. The EDAAInc web site has been advertising the course as “nationally accredited” however this is not correct. There is no current **nationally accredited** course for equine dentistry in Australia.

2/ Mr. Burnell's claims that the course takes “approximately 18mths to complete” are explained more clearly by the Course details found on the EDAA web site which state: “There is an on-campus component of approximately eight weeks, followed by 230 days of industry experience.”

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<sup>1</sup> <http://www.equinedental.com.au/course.htm>

3/ The development of national competencies in equine dentistry will mean Mr. Burnell's course as it exists will become obsolete when its registration in Victoria comes up for renewal. He will be required to upgrade his course to meet the national competency standards at no doubt some significant expense and inconvenience.

**The AAED Inc is of the opinion that there is a conflict of interest with Mr. Burnell criticising the development of a national qualification while controlling the course delivered in Victoria.**

4/ In 2004 Mr. Burnell was invited to a meeting held in Brisbane to discuss the need for industry unity and the development of national training standards. At this point and to date he has refused to be involved with the process. We believe he has been obstructive in the development of National Accreditation from the outset and has provided very little if any constructive input.

We also note that representatives from the veterinary industry were also invited and involved in the 2004 meetings.

5/ Mr. Burnell's statistics regarding equine dentist's numbers and the industries potential in Australia are dubious.

The Rural Industries Research and Development Corporation R&D plan 2002- 2006 says there "is around 1.2 million horses used for racing, equestrian sports, recreation and meat products in Australia. The equestrian federation has 500 registered clubs, 13800 members and 28500 registered horses. Sixty thousand young Australians are members of pony clubs. More than one million horses are kept on Australian farms and those in metropolitan areas provide a major demand for livestock feed.

These brief statistics indicate the significance of industry and community involvement. A recent study by RIRDC estimated that the contribution to GDP of the horse industry is over 6.3 billion and if volunteer labor is included the contribution of the industry to GDP is almost \$8 billion. 2

The letter included in Mr. Burnell's submission from Edge Equine to support his statistics on instruments sold and potential numbers of dentists is also questionable. Some of our full time member dentists have never even heard of Edge Equine preferring to source their equipment from alternative manufacturers or have instruments made to order. There are many equine dental equipment suppliers world wide. Tim McMahon from The Edge Equine also noted in his letter that there were several other suppliers in Australia apart from his own. His estimates of full time and part time dentists is questionable

6/ The AAEDInc notes that Mr. Burnell has refused to provide the project consultant with details regarding the content of his course and yet he is complaining that he has not been consulted in the development of the current draft competencies. The competencies are reflective of skills; experience and course content from within Australia and around the world and do not reflect the content of any one course. The AAEDInc believes that the draft competencies reflect world's best practice in both the standard and types of procedures currently undertaken by equine dentists around the world. The AAEDInc is of the opinion that Mr. Burnell's current course produces dentists who are trained to deliver only very basic maintenance procedures compared to worlds best practice standards.

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<sup>2</sup> R & D Plan for the Equine Industry Program 2002-2006

7/We note that the EDAAInc has withheld their “Code of Conduct” as confidential information. We also note that the EDAAInc has no current “Standard of Practice” outlining standards of work to be performed by their graduate Cert IV dentists. The AAED Inc does have a current Standard of Practice the content of which is closely reflected in the draft competencies at Cert IV and Diploma level. This current “Standard” was initially developed by the non veterinary industry over 25 years ago. Changes have been made as and when necessary to reflect current knowledge and procedures. The standards have stood the test of time and scrutiny by the Horse industry and Dental profession.

8/ Mr. Burnell’s submission letter states that “there are several proposed procedures which have no scientific basis” There are no procedures contained in the draft competencies which are not being performed by non veterinarian’s and veterinarians alike around the world. There are no procedures in the draft Certificate IV competencies that can not be performed legally by successful students in its current form. There are some ‘restricted acts of veterinary science’ within the units of competency for the Diploma that is deemed essential for a modern equine dental practice.

9/ We would like it noted that we have no complaints regarding the management or handling of the development process by Agrifood Skills Australia to date. We can only commend the staff involved so far.

10/ The AAED Inc would be happy to provide a representative to provide evidence to the senate enquiry regarding Mr. Burnell’s submission and the contents of this letter should this be considered necessary.

Kind Regards

Sue Combridge  
**President**