



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
PO Box 6100
Parliament House
Canberra ACT 2600
Australia
Email: eewr.sen@aph.gov.au

Re: Submission Number 102 – Australian Veterinary Association (AVA)

Dear Dr Batge,

We have recently become aware of a submission by the Australian Veterinary Association (AVA) to the Senate Education, Employment and Workplace Relations Committee Enquiry into Industry Skills Councils (Submission 102).

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 40 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. Many members hold qualifications at degree level. 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. Other equine dental associations represent an estimated 70 dentists in Australia. In addition there are an un-qualified number of people performing a range of dental procedures Australia wide who are not affiliated with any association.

Although the AVA senate submission responds to the enquiries scope on a broad basis around the development of the paraprofessional industry we note they highlight their arguments primarily by reference to the current situation regarding equine dentistry national competency development currently being undertaken by ISC Agrifood Skills Australia. Our response relates to the Senate enquiries terms of reference in relation to the *role and effectiveness* of Agrifood Skills Australia in the *operation of the national training system* through their development of these competencies and also *related matters*.

We would like to make the following comments regarding specific comments from AVA's submission to the Enquiry-

These Special Interest groups (AVA) cover a broad range of veterinary interests in all livestock species, horses.....Many veterinarians work with or alongside paraprofessionals in their daily routines.

The AVA has a vital interest in the activities and training of Para-professionals¹

Our industries interest in our activities and the training within our industry is undeniable as we have been working in consultation with ISC AgriFood Skills for 4 years on the development of national competencies for equine dentistry after advice from the NSW Department of Primary Industries in 2006.

The AAED Inc respects the skills and training of veterinarians and supports a consultative approach to equine dentists and veterinarians working in the field to benefit equine welfare

The AAED Inc believes however that the AVA is using this senate enquiry as a political strategy to further delay the development of national competencies for equine dentistry being managed by ISC AgriFood Skills Australia.

The AAED Inc believes that the AVA has a “*vital interest in the activities and training of Para-professionals*” because the AVA does not want to see the successful development and formalising of a paraprofessional equine dental industry which is **independent** of veterinary control. The AAED Inc believes that the non veterinary equine dental industry provides services which are in direct competition to veterinarians who have a “*special interest*” in and potential to gain financially in this area. It is the AVA's charter to represent the interests of those members performing equine dentistry.

The AAED Inc believes that ISC AgriFood Skills Australia has at all times attempted to involve and engage the AVA and their associated representative groups such as the Equine Veterinarians Australia, Australian Veterinary Dental Society and also the Australian College of Veterinary Surgeons but that their involvement has been half hearted and less than constructive as a result of a political agenda. All four of these groups recently refused to support draft competencies for either the Cert IV or Diploma level qualifications for equine dentistry and any feedback thus far has been negative, un- constructive and has hindered the work of ISC AgriFood Skills Australia to progress competency development.

We are concerned that continued tactics to delay the ISC Agrifood Skills Australia equine dental continuous improvement project will result in the project failing to be completed on time. If this occurs then the AVA and its associated organisations will have access to world class competencies for equine dentistry while the current working arrangements in Australia would continue to be anti competitive and in the veterinary interests.

¹ AVA senate submission Pg1

4. Whether Para-professionals are accredited, licensed and accountable².

Accreditation, licensing and accountability are the driving reasons behind our industries work with ISC AgriFood Skills toward the development and formalisation of national competencies in equine dentistry

Non veterinary equine dentists have been servicing the equine industry for hundreds of years. Skills and knowledge related to equine dentistry has been developed historically and formalized since before veterinary colleges were in existence. The development of national competencies is required to formalize the current day training and course content from around the world to conform to the requirements of the Australian Quality Training Framework and provide much deserved professional recognition for the non vet equine dental industry. This AQTF training will provide opportunities for rural and regional Australia to access much needed standardized services across all states of Australia. The public and equine welfare will benefit as a result through development and formalisation of an existing industry while ensuring that the intent of State Anti Competition Policy and the Trade Practices Act 1974 requirements are provided for.

4 i and ii ³

The AAED Inc supports the AVA call for protection of the public through accountability and a regulatory board for non vet equine dentists. This can not become a reality until the equine dental competencies drafted and managed by ISC AgriFood Skills proceed to validation stage thus allowing registered training organisations to develop/ upgrade course curriculum. This will allow up skilling and formalisation of equine dentist's skills and experience across the country including the recognition of prior learning. This outcome will be a clear example of the effectiveness of ISC AgriFood Skills Australia. It is a pity the AVA does not seem to understand the processes involved and appear to be slowing and delaying competency development which will then allow for one outcome they say is of concern to them.

We vehemently oppose however the management of professional/qualified equine dentists by existing vet boards. We believe this is anti competitive as there would be vet board members providing the same equine dental services as the dentists they would be regulating. We believe that a Western Australian veterinary practitioner's board member and her role in the delivery of the short five day post graduate course for vets is a clear example of this (see attachment 1 confidential). Veterinary Practitioners Boards are also open to influence by veterinarian associations. (Refer to attachment 5 confidential)

Draft competencies for equine dentistry which have been developed by ISC AgriFood in consultation with state regulators and stakeholders reflect the need for adherence to legislation where relevant.

The successful completion of the ISC AgriFood Skills Australia equine dentistry continuous improvement project and delivery of AQTF training will allow qualified equine dentists to obtain the appropriate insurances to cover procedures they perform thus eliminating this key AVA concern for accountability and protection of the public. Equine dentists will continue to be accountable under existing legislation such as the Prevention of Cruelty to Animals Act and Animal Welfare legislation.

² AVA senate submission Pg2

³ AVA senate submission Pg2

4 iii Veterinarians are registered and controlled by veterinary practitioners 'boards. The public has assurance of training, accreditation and statutory oversight. Veterinarians can be investigated and disciplined in the event of incompetence or malpractice. They are required to undertake extensive continuing education to maintain registration to practice all veterinary procedures, including equine dentistry⁴

The AVA appears to have confused legislation and policy here. Yes, vet boards register and control vets who have completed formal studies which gives the public certain assurances. It is only AVA policy however which appears to support all vet compulsory attendance of continuing education in relation to equine dentistry.

The Australian Veterinary Post Graduate course is delivered as a short 5 day course and contains a vast amount of information with no nationally recognised competency based assessment for the practical use of power tools or the skills learned as is provided for in the draft competencies under development by the ISC AgriFood Skills Australia. Wet labs designed to provide additional practical experience for vets are being delivered in conjunction with veterinarians from overseas. Some of these vets have been at the forefront of lobbying overseas for legislation to ensure non vets either can not perform dentistry or must operate under the direction of a vet. Australian vets involved in working with these overseas vet dentists and delivering post grad training for a fee are also members of the veterinary associations currently resisting and slowing the work of ISC AgriFood Skills to develop Australian competencies for non vets.

5. The development and delivery of training programs.

i. Expert and professional input is required to develop the list of competencies to achieve the desired standard. Lay persons need guidance by professional experts in each area of study in the development of competencies and also in the teaching of these programs.⁵

The AAED Inc believes the above comment is both arrogant and misinformed.

ISC AgriFood Skills Australia and the Equine Dental National Reference Group have received some feedback from Australian vet boards and State Regulators that the content of the Draft Diploma level qualification for equine dentistry would be suitable for a graduate veterinarian to complete. Interestingly, the competencies have been drafted after job role analysis and scoping work by ISC AgriFood Skills Australia which reflects international standards and procedures for work performed by non vets around the world.

The AAED Inc believes there has been negligible constructive input into the competencies to date from the veterinary organisations which are also training vets in equine dentistry and that this is due to a desire to slow the process and increase their ability to control the development and operation of the industry.

⁴ AVA senate submission Pg2

⁵ AVA senate submission Pg2

After competency development is finalised by ISC AgriFood Skills Australia course curriculum/s will be required to be altered/developed in consultation with appropriate experts from both the veterinary and non veterinary fields. Course curriculum designers will be free to engage the services of veterinarians and non vet industry experts. Curriculum will have to meet and provide for the outcomes specified in the national competencies. This is the whole point of competency based training and Australia's National Vocational Education Training Scheme, a fact which the AVA does not seem to fully understand

The above statement implies that vets alone are "expert and professional" in the field of equine dentistry. Historically this has not been the case. (Refer to attachment 2 – confidential)

The AAED Inc believes the AVA wants to increase the amount of influence they have over the development of the competencies currently under development by the ISC AgriFood Skills Australia in an attempt to restrict the level of dentistry and procedures which can be performed by a non vet. This will protect the interest of veterinarians who would like to educate themselves to "specialize" in equine dentistry.

The current draft competencies at Cert IV and Diploma level contain procedures which accurately reflect the job role, are supported by existing legislation in Australia and encourage the development of professional relations between the equine dentists and the veterinarian.

6. Arrangements for consultation with the veterinary professionals to monitor the standard of students completing the training packages⁶

Again the AVA assumes that it is the veterinary industry alone that has the skills and experience to monitor equine dentistry training. The AAED Inc expects that training will be delivered where necessary in consultation with members of the veterinary industry who are open to working in consultation with the non vet industry and not in direct competition.

AVA representatives at a recent National Reference Group meeting admitted that a graduate degree does not equate to "competency" to perform equine dentistry and that a post graduate course is required. The current post graduate course is delivered by veterinarians who have not been assessed by any industry recognised competency based system such as offered by the International Association of Equine Dentistry (IAED) which is the worlds largest dental association representing both vets and non vets. The World Wide Association also has blind testing procedures in place to ensure fair testing. Many non vets are involved in assessing the competency of vets in equine dentistry around the world.

i. Wide variations in the abilities of persons who complete certification and diploma level courses must be prevented with appropriate assessment protocols.

The AAED Inc fully supports appropriate assessment protocols based on competency. The non vet industry has access to skills and testing procedures which are far more developed than the current requirements for veterinarians who attend a fee paying 5 day short course

How are the wide variations in the abilities of veterinarians who complete a short post graduate course provided for by the Equine Veterinarian Association? Again the AVA does not seem to understand Australian competency based VET or the role which Industry Skills Councils play in the development of competencies which allow course delivery within the AQTF.

⁶ AVA senate submission Pg2

ii. Lack of quality assurance across the various training providers is a risk factor.

Again the AVA does not seem to understand the Australian competency based VET system. Post competency finalisation by ISC AgriFood Skills Australia, any courses developed must be delivered by Registered Training Organisations. RTO's must adhere to strict quality assurance requirements for course delivery, assessment, administration and record keeping.

iii. Schemes designed for non-professionals need to be based on training programs following consultation with industry and skilled professionals.

Equine Dentistry competency development by ISC AgriFood Skills Australia has been undertaken by consultation with industry and skilled professionals for 4 years. The AVA has resisted involvement and any input into the development process by them has in our opinion been based on the un-realistic expectation that they alone are capable of performing, training or assessing equine dentistry. The project timetable for completion is close and they only now appear to be interested in being involved. They are currently hindering the positive and successful completion of the project. We believe this is because the AVA has a conflict of interest in their dual role of protecting the interests of the veterinary equine dentists they represent and providing input into the development of competencies which will allow non veterinarians to be qualified within the AQTF and compete with their members on a more level playing field.

7. There are demands for access to scheduled poisons.⁷

The Draft competencies proposed by ISC AgriFood Skills Australia DO NOT currently contain a sedation unit which would allow an equine dentist to be trained to sedate independently. ISC AgriFood Skills Australia removed the proposed sedation unit in 2009 at the insistence of the AVA. Any reference to sedation in the current draft competencies relates to the need for a dentist to work in consultation with a veterinarian where legally required.

Dentistry and power tools can be legally performed and used across Australia by non vets currently with NO minimum standards for training or assessment. Sedation is required for OH&S and also animal welfare when power equipment is used.

The administration of sedation for equine dentistry is currently primarily the responsibility of a veterinarian. This means that a dentist and their client wishing to undertake dentistry on a horse is reliant on the services of a veterinarian who may or may not be in direct competition with the dentists for the services being provided. Vets who are in direct competition with a dentist can refuse to sedate, or undercut the dentist on dental services and also provide sedation concurrently. Currently, the public who employ a non vet dentist are forced to pay for the services of both the dentist and the veterinarian which means higher costs and greater inconvenience. Many clients and dentists are frustrated and annoyed at the monopoly which veterinarians have in this area. We believe that this situation does not serve the interests of the public or equine welfare as horses are not receiving the level of care they should due to the often unworkable nature of this arrangement.

⁷ AVA senate submission Pg2

There is legal provision and precedent for non veterinarians to be authorised to access and administer scheduled poisons under some current legislation in Australia. Horse owners, council pound staff, RSPCA staff, deer velveters, horse trainers and equine dentists are all able to be “trained” and gain access to relevant scheduled drugs for specific uses in different states of Australia

The WA guidelines for equine dentistry are the most progressive in Australia regarding their ability for non vets to be “authorised” to perform certain procedures but are also a clear example of why regulation of equine dentists by vet boards is anti competitive in nature. This provision for “authorisation” exists in a number of state vet acts. Currently in WA non vets can be “authorised” to perform certain procedures including sedation for equine dentistry and equine dental procedures. The “training” for sedation is minimal and the draft sedation unit **removed** from the ISC AgriFood Skills Australia draft competencies after AVA objection exceeded by far any current requirements for training.

In Western Australia non vet dentists are required to be “sponsored” by a vet and the vet is held accountable for the actions/ work etc of the dentist. The vet has access to all client/ business records of the dentist. If a vet is not agreeable to “sponsoring” a non vet to perform dentistry or sedation then the dentist is unable to operate within the board’s guidelines even though they may have clients wishing to employ their services. Vets who are performing dentistry are unlikely to sponsor a non vet and vets can decide to “sponsor” for dentistry alone and not sedation. This requires the dentist to be reliant on vet sedation services which protects the vet’s income potential. This is effectively giving the veterinary profession the “first slice of the pie” and is anti competitive. Dentists wishing to perform dentistry and sedation legally are required to find a vet who is “agreeable” to them operating and who is **not** interested in delivering dental or sedation services themselves.

The AAED Inc believes that the AVA is using the Senate Enquiry into industry skills Councils to create a platform of support for their resistance to the work being conducted by the ISC AgriFood Skills Australia in developing competencies for equine dentistry. In particular we believe that concerns raised relating to scheduled drugs are the result of a desire to restrict any further access by trained non veterinarians to the access and administration of sedation for dentistry. This would effectively protect their members from competition in this area.

It is in the AVA’s interest to attempt to influence the training package content in their favour as their industry is acutely aware that changes to legislation as result of Trade Practises Act 1974 and anti competition policy is not supportive of a monopolisation of services by their industry (Refer attachment Three Confidential Pg 7-14)

*A case study in point is the recent process directed toward development of a Certificate IV Equine dentistry package:*⁸

The draft competencies produced by the ISC AgriFood Skills Australia are for both Certificate IV and also a **Diploma** level qualification to cover the more advanced procedures currently performed around the world by non vets

*Some important facts in equine dentistry:*⁹

- Equine dentistry has been performed at basic level for many years by persons trained by apprenticeship or personal experience without any formal oversight. These persons have performed a physical task using basic tools such as rasps to remove sharp points that develop on horse teeth. Some times they cause lacerations or other trauma.*
- in recent times great advances have been made in understanding the dental needs of horses.*
- there has been a surge in the use of power driven instruments to treat a greater range of abnormalities as with human dentistry.*
- Such instruments can very rapidly cause life-threatening damage to the oral cavity, bones and the health of horses, and affect their ability to masticate feed.*

The non vet equine industry has been a major force in the understanding and development of equine dental procedures and instrumentation over many decades. The non vet industry has taught the veterinary fraternity many skills relating to advanced dentistry. Australian Universities have historically used non vets to lecture to their undergraduates in equine dentistry. This was before key veterinary industry representatives “came up to speed” on equine dentistry by travelling overseas as many non vets had done before them. Veterinarians have attended non vet schools overseas and sourced training overseas to learn the practical skills required to perform both manual and power tool dentistry. The International Association Equine Dentistry is the world’s largest equine dental association and their certification program is the same for vets and non vets. (Refer attachment Four Confidential)

Veterinarians and their related legislation have traditionally not seen equine dentistry as an area of interest due to the historically physical and dangerous nature of the work. This is reflected in the legislation across Australia which makes equine dentistry exempt from being an act of veterinary science. Veterinarians have traditionally been poorly trained in equine dentistry. Their interest has been renewed in recent years as a result of the increased use of power equipment and sedation which makes the work easier physically, safer and more financially rewarding. (Refer to attachment 2 – confidential)

Most power equipment for dentistry on the market today has been developed and designed by non veterinarians. Our industry is able to legally use power tools currently without any standardized training. Instruments can be purchased off the internet by persons with no training. The draft competencies clearly provide for training to minimize or eliminate risks attached to power tool use. Competencies managed by ISC Agrifood Skills Australia will provide for a qualification which will provide for practitioners to access appropriate insurances. This will protect the public rights and provide dentists with the same protections afforded to a trained veterinarian who performs procedures with “risk”.

⁸ AVA senate submission Pg3

⁹ AVA senate submission Pg3

It has been the hard work of ISC AgriFood Skills Australia in conjunction with industry which has resulted in the development of draft competencies for equine dentistry. These will raise the standard of training Australia wide and result in improved animal welfare outcomes while providing the public with freedom to choose their equine practitioner. If the AAED Inc did not want to benefit animal welfare by improved standards and training our members could continue to work legally under existing legislation, without having pursued the development of national competencies through ISC AgriFood Skills Australia who have the appropriate mandate.

The AVA, being the peak body representing veterinarians in Australia, has been a participant in the consultation process to develop such a course in equine dental procedures for non-veterinarians.¹⁰

AVA policy and their associated bodies in Australia do not support equine dentistry performed by any one other than a veterinarian. “The Australian Veterinary Association, along with Equine Veterinarians Australia and the Australian Veterinary Dental Society, believes equine dentistry is an important branch of veterinary medicine which should only be performed by a registered veterinarian”¹¹. The AAED Inc believes they have been an un-willing participant in the consultation process and have no genuine desire to work cooperatively with ISC AgriFood Skills Australia or our industry to develop national competencies which reflect the true job role performed by professional equine dentists.

The AVA represents veterinarians that perform the bulk of equine dentistry in Australia and has access to specialist expertise that can be called upon for informed comment.¹²

This issue would logically not be such a contentious political issue if the “bulk” of equine dentistry was performed by vets.

By the AVA’s own admission in a recent NRG meeting, a graduate veterinarian is not properly trained in their degree to perform equine dentistry. This means all vets must complete a short post graduate course with no competency based assessment for the significant level of practical skills required. This course has only been running for a few years.

With an estimated 1.2 million horses used for racing, equestrian sports, recreation and meat products in Australia¹³ The AVA has no grounds to suggest they perform the bulk of dentistry in Australia and while they no doubt have some specialist expertise relating to equine dentistry it is unfortunate that those same veterinarians are likely to be competing for the same clients as a professional equine dentist with good training and an established dental business.

Many vets in the field work in consultation with our members each day for sedation and other services. Our members report that many vets have no interest in performing equine dentistry and are happy to refer to a dentist. It is also our understanding that some veterinarians who support the development of national standards and training for non vets are too intimidated to speak out or are not members of the AVA and they have no regard for their policies.

¹⁰ AVA senate submission Pg3

¹¹ <http://eva.ava.com.au/dental-faqs>

¹² AVA senate submission Pg3

¹³ R & D Plan for the Equine Industry Program 2002-2006

Summary

We believe the AVA is overstating both their involvement in the industry and their right to dictate the development of competencies for equine dentistry. The role of ISC AgriFood Skills Australia to develop these competencies has been continually challenged and thwarted by the AVA. This has resulted in wasted time, money and staff resources while delaying the development of world class competencies which will benefit the public, the equine industry and most importantly the horse.

The AAED Inc has 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 however we continue to be frustrated by the negative actions of the AVA.

The AAED Inc believes ISC Agrifood Skills Australia is a more than effective body for the development of national competencies relating to the Animal Care and Management training packages. ISC Agrifood is fulfilling a vital and effective role in the operation of the National training System.

The AAED Inc would be happy to provide evidence in person to the senate enquiry regarding the Australian Veterinary Associations' submission and the contents of this letter should this be considered necessary.

Regards

The Australasian Association for Equine Dentistry Inc
25th September 2010