



SENATE INQUIRY INTO INDUSTRY SKILLS COUNCILS

31 August 2010

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

Dear Dr Batge

Re: Response to Submission No: 61

AgriFood Skills Australia (AgriFood) wishes to submit the following response in relation to Submission 61 from the Equine Dental Association of Australia (EDAA) to the Senate Education, Employment and Workplace Relations Committee Inquiry into Industry Skills Councils. The purpose is to clarify some areas contained in Submission No. 61 which could be misleading.

1. Need for National Training/Work Standards for Equine Dental Providers

The development of Nationally Endorsed Qualifications will provide necessary standards to assess the competency of providers and in turn provide standards by which suitably trained and qualified providers could be registered/regulated.

In 2006 a request was received by AgriFood Skills Australia to undertake work to include Equine Dental Qualifications in a National Training Package.

This request was supported by the NSW Department of Primary Industry as the department required the development of nationally endorsed training standards in order to progress the establishment of an industry accreditation scheme for equine dental providers under the national framework.

As part of the environmental scan non-endorsed training programs and one post-graduate veterinary distance education program in equine dentistry were identified in Australia. The *RIRDC Horse Industry: Contributing to the Australian Economy 2001* report conservatively estimated there are over 700,000 domesticated and 300,000 feral horses in Australia. The report also identified that equine dental services required on average two visits per year per domesticated horse (up to 4 for performance horses). Data to establish the current number of Equine Dental Practitioners was very hard to quantify, due to the disparate nature of the profession, the range of industry associations in Australia and non-aligned practitioners.

Support for national training standards development was also provided from a range of other stakeholders, including horse owners, veterinarians, Equine Dental industry associations, racing training authorities and enterprises etc.

In September 2006, Michele Jackson (Project Consultant appointed by AgriFood) met with the current EDAA President, Mr Burnell in Melbourne to discuss the establishment of national training

package qualifications in equine dentistry. At this time Mr Burnell voiced no concerns regarding national qualifications. He confirmed the current work of EDAA to develop a privately copyrighted Victorian accredited course, which in itself indicated that consistent training standards for the industry were lacking.

Research findings such as those presented in *Equine Dentistry in Victoria*, University of Melbourne 2007 (industry mentor: EDAA President, Mark Burnell) are precisely the reason that Nationally Endorsed Training Standards are required.

Extract: "Qualifications appear 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 seem 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".

The EDAA submission quoted: '*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*'. Whereas the University of Melbourne 2007 report noted:

"Availability of "top notch horse savvy dentists" may be a problem and as one client commented that "they are very busy which points to there not being enough dentists". Although there are practitioners operating throughout Victoria, the fact is that many clients prefer to use dental technicians over veterinarians. With 54% of dental technicians treating on average over 50 horses per week and reaching their limits with the number of horses they can physically do these facts may actually point to a need for more practitioners."

2. Certificate IV in Work Practices for Equine Dental Technicians (Victorian accredited)

This is a private course - copyrighted to the EDAA and not a nationally endorsed qualification under the Australian Qualifications Training Framework. The cost for students to undertake this course is \$20,000. As a privately copyrighted and accredited course it is not available for other Registered Training Organisations to include on their scope, therefore limiting access by potential candidates to training and/or recognition of prior learning processes.

Upon endorsement of national training standards, under the current State policy, this private course will not be re-accredited.

3. Consultation processes

AgriFood has in place a Procurement Policy (<http://www.agrifoodskills.net.au/contact-us/consultants-panel/>) for the engagement of consultants. This policy works through a select pool of non-exclusive providers for consultancy services to AgriFood. The Equine Dental Project Consultant has been engaged by AgriFood, on a stage-by-stage basis, under this policy.

Initial development work began in June 2008 through an Industry Reference Group (IRG) drawn from the following associations:

- International Association of Equine Dentistry (Aus Chapter)
- World-Wide Association of Equine Dentistry
- Association of Equine Dental Practitioners (Aus)
- The Equine Dental Association of Australia (EDAA)

All IRG members were provided with the same lead time notification of IRG meetings. Mr Burnell was provided the same opportunity to participate as other industry members. He was advised of the purpose of each meeting and the tight timeframe imposed on the consultants to complete this stage of the project.

Two weeks prior to the first IRG meeting, the consultant contacted Mr Burnell and discussed the possibility of accessing the EDAA Victorian privately accredited course content as the basis for the development of the National Training Standards. This possibility was declined by Mr Burnell; other

IRG members however did provide information on Australian and overseas equine dental courses and accreditation programs.

A second meeting was held on 23rd August 2008 to review the proposed qualification structure and confirm specific technical content for units of competency. While Mr Burnell attended this meeting and had the opportunity to voice his concerns, these were not raised until the receipt of the September 2008 letter (referred to in Submission 61) to the Project Consultant.

During the later half of 2008 and throughout 2009, further consultation was conducted initially with the Australian Equine Veterinary Association and then with selected representatives nominated by the national Australian Veterinary Association. During this process AgriFood made the decision to work with a small working party to progress the development work to such a point where it could be released to the Industry Reference Group members and for wider stakeholder consideration.

In November 2009, AgriFood wrote to all relevant State and Territory Departments of Primary Industries to request assistance in ensuring appropriate alignment of the draft qualifications and units of competency across state and territory regulatory requirements.

Following finalisation of the draft qualification materials, a National Reference Group (NRG) was established in May 2010 including Mr Burnell as the EDAA representative. The draft materials were released in June 2010 to the NRG members and all State and Territory Regulators for review and feedback by their networks.

Following this release the EDAA advised via letter in July 2010 they did not support the draft materials and were withdrawing from membership of the NRG.

4. Summary

AgriFood and/or the Project Consultant have responded to the letters received from the EDAA during the various stages of this project. At no stage have the EDAA provided any technical input and/or provided suggested amendments regarding the content of the draft materials. Although EDAA comments referring to the similarity between the Victorian course and the proposed units to be included in the national training package suggest that the draft materials are representing the views of most stakeholders in the development of nationally recognised equine dental qualifications.

In conclusion, and as this response indicates, there are a large number of stakeholders that have direct and indirect interest in the development of national Equine Dental qualifications. AgriFood has engaged in a staged process to progress this work and believe the final results will provide national training standards that support the required job outcomes.

AgriFood would be pleased to provide further information if required.

Yours sincerely

John Baker
Chair, **AgriFood Skills Australia**