I would like to register my strong opposition to proposed changes to the dental register to register all dentists, dental therapists, dental hygienists, dental technicians and oral health therapists under the single category of "dental practitioner".

I am a registered specialist with the Dental & Medical Boards of Australia in the specialty of Oral & Maxillofacial Surgery. In my own experience there is a great deal of confusion in the public as to the already existing differentiations between allied dental professionals, general dentists and different types of dental specialist. To change the register to include allied professionals within the general term "dental practitioner" will further confuse the issue and possibly lead to harm.

All of these professional groups are necessary to the provision of a high quality of dental care in the community. However, the training of these different groups is vastly different. To diminish the role of the general dentist in the team approach is a retrograde step. In my view this will lead to poorer quality of patient care. I do not see that this will result in a reduction of costs to the community for several reasons:

- the cost of obtaining any of these qualifications continues to rise significantly and practitioners are unlikely to manage debt if they cannot continue to run a profitable practice
- there is no likelihood that dental therapists etc would charge any less than a general dentist for the same services (I think there is ample evidence to support this)
- there is likely to be an increasing trend for provision of cosmetic procedures rather than preventive and restorative care (as this is where profits can be made in a saturated market, and in terms of services such as bleaching does not require advanced training)
- fringe practices are likely to increase; where an increased number of practitioners are within a market I feel that you will find an increasing amount of unproven therapies being offered for various conditions such as TMD and OSA at significant cost to the patient

I do not think that dental therapists should be allowed to provide care to all age groups. It may have been acceptable to have this group of professionals restoring deciduous teeth under immediate supervision of a general dentist but the increased scope of practice is unnecessary especially given the flood of new dental graduates who have the advanced training to make global diagnoses and treatment plans for ALL patients.

I cannot fathom the suggestion to allow dental technicians to provide implant retained overdentures independently. Who maintains these implants? Will the prosthetist provide periodontal care?

The standing of the dental profession is already diminished by the inability to provide quality care at an affordable price. We are seeing an increasing proportion of the community who have either no private health cover or inadequate health cover. Public dentistry in Queensland is in a parlous state and is available to very few people and provides almost no preventative or general restorative treatment. The rebates provided by the private insurers make it very difficult to sustain a practice and this is only becoming worse.

The proposed changes seem to offer nothing in terms of an improved outcome for individual patients or the community as a whole. The proposed changes seem more about complete deregulation of the dental workforce whereby it becomes incredibly hard to control standards of care. Whilst this may be aimed at reducing costs to the community I feel that it will have the opposite effect.

Yours Sincerely

Alistair Reid BDS MBBS FRACDS(OMS)