

**Submission on the
Draft Veterinary Practice Regulation 2006 and
Regulatory Impact Statement**



AUSTRALIAN EQUINE DENTAL PRACTICE

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1. BACKGROUND

I make this representation as an equine dentist who has practised for the past 25 years. I have operated the business of the Australian Equine Dental Practice for that time and have trained associate equine dentists who operate independent practices in various parts of Australia. In more recent years I have trained equine dentists, including several who received Certificates from the University of Melbourne based on their skill level. Others that I have trained include a veterinarian from Hungary and a human dentist/implantologist from Dubai.

I have been regular lecturer for the RSPCA Education department at their Victorian head office in Burwood. Other venues where lectures have been conducted are Goulburn Ovens Tafe Wangaratta, National Environment Centre Albury and numerous clubs and institutions. I have official ties with a number of veterinary clinics which are known as our treatment centres.

2. EFFECT OF PROPOSED REGULATION

- a. Part 2 Clause 4 (1) **“Examination of or attendance on any animal”**
“the examination or attendance etc.... ” An example of this would be to open the horse’s mouth and conclude that a horse had stomatitis (inflammation of the mouth). This would become an offence under the Act. Even looking for a laceration in the mouth would constitute an offence. Likewise, even a farrier using pincers to see if there was pain in the foot would constitute an offence. As a horse owner I would object to the latter being prevented from doing so.
- b. Part 2 Clause 4 (1) (d) (xi) **“the performing of dental procedures other than tooth cleaning and rasping”** This means about a page full of procedures, no matter how small, are no longer allowed. For example: Removing a temporary front tooth that is loose is not permitted even

though there may be a proliferation of putrid feed lodged underneath it. Molar caps and wolf teeth- ditto. Removing feed from a deep diastema- ditto. I would not even be allowed to apply disinfectant or salt to a cut cheek. As well as that, all the senior equine veterinarians who I work with, cannot have me extracting permanent molars anymore.

Veterinarians often lack the strength, experience and equipment to facilitate efficient removals. That means more extractions from the outside through the jaw bone or even the sinus with all the complication risks that have been well-documented. For the benefit of the horse? Definitely not! For some veterinarians insistent on massive operations it has the pleasant side-effect of generating substantial revenue.

- c. Part 2 Clause 4 (1) (f) **“insertion of anything into certain body cavities” “the carrying out of any treatment, procedure or test....”**
This means I could not use a pair of tweezers to remove grass seeds from alongside a tooth or from a salivary duct opening. It would require a vet but in practice it would mean the horse will go without professional care. It does not benefit the welfare of the horse.
- d. Furthermore, other points have been raised by the Association of Equine Dental Practitioners; as a member I strongly support the submission made by the secretary on our behalf.

I encourage you to have a look at the RIRDC Survey 'Australian veterinarians working with horses - Survey Key Points. It will make it clear that further benefits should not be extended to those who have long ago forsaken the dental related well-being of horses because: “..they do not learn and offer good additional skills..” or “..One practical in 5 years of veterinary training is understandably insufficient training” or “...too lazy to do teeth...”

I need to emphasize that there are many fabulous equine veterinarians who take a rational approach and accept individuals on their merit. However, this is inadequate and I support regulation by means of the Equine Dental Practitioners Board and a system of licensing with annual renewals. This will give the public as well as veterinarians an excellent avenue to select accredited persons.

Finally, any decision you make must primarily take into account the welfare of the horse and those best qualified or experienced should serve them in a competitive but regulated environment. Turning the clock back to dark days of protectionism will not foster excellence, only high prices. I support high standards of equine dentistry by setting high qualifying standards, accreditation and licensing of all operators through that instituted by the Association of Equine Dental Practitioners.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Peter Borgdorff', written in a cursive style.

Peter Borgdorff, certified equine dentist

Australian Equine Dental Practice