



SUBMISSION TO THE
PROPOSED VETERINARY PRACTICE REGULATION 2006 UNDER
THE VETERINARY PRACTICE ACT 2003

by the
**ASSOCIATION OF EQUINE DENTAL PRACTITIONERS
(AUST) INCORPORATED**

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Preliminary Note

The Association has members throughout Australia and has several members who conduct practices in NSW. Advice about the proposed Regulation was received at the eleventh hour, giving us less than 2 weeks to prepare this submission and liaise with our members. It is for that reason we did not address all points of the proposed Regulation in detail.

1. INTRODUCTION

Historically, the filing of equine teeth and tending to other oral disorders has been conducted by a variety of people, some were experienced and knowledgeable, many were not. Over the past hundred years or so there has been less and less veterinary involvement in equine dental treatment and public education. Indeed, a 2003 survey by the RIRDC contains ample reflections that highlight reasons why equine veterinarians had not pursued gaining equine dental treatment skills nor intended to pursue them in future.

In recent times more veterinarians and so-called equine dental technicians have taken up adapted industrial power tools which require sedation. The introduction of power tools is often combined with expensive courses commonly lasting as little as 2 days or 2 weeks. This illustrates the fact there is money in 'new age' equine dentistry. Some veterinary tutors proclaim ease of use, convenience and are even actively involved in marketing power equipment which suggests questionable ethics. Astonishingly, it has been reported that as little as two minutes of power grinding without water cooling can irreversibly damage the tooth pulp (G. Baker, Uni. of Ill.) Many trained dentists and

more experienced veterinarians frown on the use of power tools and the sedation of every patient. There are currently 2 equine dentistry schools in Victoria who do not advocate the routine use of power equipment. If high speed diamond cutters are used continuous water cooling is to be applied.

Many veterinarians testify that undergraduate education in equine dentistry is extremely deficient and does not even equip a veterinary surgeon for basic equine dental procedures. Compare this to the 5 months theoretical and practical training (preceding industry experience) which is now considered a standard for certified equine dentists in the south of Australia. It is the minimum standard required for graduates requiring membership of the Association of Equine Dental Practitioners (Aust).

However, we need little debate about the substantial role a veterinarian can play in collaborative patient management. Much suffering of the horse is prevented when professionals in different fields work together. There are many such examples that testify to the success of such 'patient comes first' processes.

2. OBJECTIVES

The welfare of the horse must come first. Legislation must provide a workable solution to facilitate those properly trained to be continuously scrutinized in the performance of their duties. The proposed legislation fails to safeguard horse welfare and is not a reflection of reality. The blunt 'all vets are trained to do teeth' leaves horses prone to become victims of the unskilled. We have averted many a court case by placating owners who had unrealistic expectations and found serious issues went unaddressed. We strongly support veterinarians who operate within the bounds of their knowledge and each of our members has built extensive networks based on exceptional horse care and professional respect. Assisting owners making a correct choice is now also being

addressed by the our Association.

3. EQUINE DENTAL PRACTITIONERS BOARD

The Association of Equine Dental Practitioners (Aust) has instituted a process which provides for a governing body, the Equine Dental Practitioners Board, for which we are currently calling candidates. Those being invited include equine dentists, veterinarians, RSPCA delegates, Australian Veterinary Dental Society members and senior judicial officers. The seven member Board will govern the process of initial examination and the annual licensing of equine dental practitioners. It will also oversee annual member evaluations to ensure adherence to the Code of Practice as established by our Association. It will also have a range of sanctions available to it. Suitably experienced or qualified equine dentists and veterinarians may apply for examination and licensing. Licenced members will never be able to perform surgical procedures or administer drugs unless they are registered veterinary practitioners. Licensed members may only operate within clearly defined pain threshold guidelines.

The operation of the Board will ensure treatment integrity within a framework of collaboration with other professionals such as veterinarians who do not wish to become licensed but focus on other equine care instead. It will also channel educational processes and research grants.

4. SUMMARY

The Association strongly opposes introduction of the legislation in its current form. Much as we support malpractices being addressed, the proposed legislation is ill-conceived and should be re-drafted. As outlined in the preceding paragraphs, we cannot support a regulation that prevents suitably qualified persons from rendering essential

equine dental treatment procedures which have traditionally not been part of veterinary practice. Some of the treatment we currently render as equine dentists includes diagnostics such as evaluation of the bite surfaces and gingival health and treatment combined with removal of feed from gingival pockets, extraction of small tooth fragments, small wolf teeth and caps. We adhere to strict pain threshold guidelines.

5. RECOMMENDATIONS PART ONE

We ask the Committee to reject the legislation pertaining to equine dentistry in its current form on the following grounds:

- a. The statutory objectives of the Veterinary Practice Act 2003 are not being met in that they fail to promote animal welfare:
 - i. It negatively affects proper care by excluding many better trained and more experienced equine dental professionals.
 - ii. The vast majority of those proposed to be put in charge of equine dental care are not skilled in equine dentistry, due to lack of education and experience.
 - iii. It fails to outlaw the use of dangerous equipment or practices such as dental shears, molar cutting sliding bolts, Swayles mouth gags and the practice of suspending heads of sedated horses from the rafters.
- b. Inadequate stakeholder and public consultation.
 - i. As stakeholders we have had less than 2 weeks to examine the proposal. This has also been inadequate to encourage public input that we may have otherwise provided to you.
 - ii. We have not heard of any reports in equestrian magazines or letters to editors about the proposed Regulation. It would appear

to fall short of what is reasonably expected under Regulatory Impact Statement guidelines.

- c. The Act's statutory objectives are also not being met as it fails to provide a mechanism for informing the public about equine dental competencies required by those proposed to enact those competencies.
- d. Under the statutory objectives of the Veterinary Practice Act certain acceptable standards are required to be met, however:
 - i. There are no standards set for education. The veterinary profession has long acknowledged virtual absence of theory or practical education covering equine dentistry. This is unlikely to satisfy the horse-owning public and is therefore not in their interest. There will be serious concern for animal welfare.
 - ii. Standards are absent and veterinary operators are inadequately governed. Having a process where the quality control relies on complaints to be received from aggrieved members of the public does not come close to any international standards.
- e. Limiting equine dentistry by persons other than veterinarians to two basic procedures, namely filing and cleaning, effectively means:
 - i. Conscientious equine dentists who took their jobs seriously can no longer practice as they cannot render a comprehensive service nor can they file young horses which have caps about to be shed.
 - ii. This regulation will create a virtual veterinary monopoly. The rendering of these services by veterinarians, with their common sedation and use of power tools, will mean prices will increase by about 200%. A standard treatment now costs \$50- to \$60- and will cost between \$120- and \$250-. This is a reasonable estimate.
- f. It will affect international trade and local business activity. Several schools in Victoria have gained a reputation here and overseas and

graduates are sought after.

6. RECOMMENDATIONS PART TWO

The Association is putting in place regulation of equine dentistry by way of the Equine Dental Practitioners Board, Annual Licensing, Annual Quality Reviews and the Code of Practice.

The process by which this may be formalized in the Regulation could be:

- a. Removing Pt 2 Clause 4 (1)(d)(xi) from page 7 of the Draft
- b. Adding Pt 2 Clause 7 to read: "No person attending on a horse for the purpose of conducting oral or dental examination or undertaking dental or oral treatment shall be deemed to be conducting an act of veterinary science provided such person is Accredited by the Equine Dental Practitioners Board to perform such procedures."

Important: No person is permitted under those controls to perform anything other than procedures below a prescribed pain threshold. No non-veterinary surgeon may ever administer drugs. All other equine dental procedures are to be conducted with a veterinary surgeon in attendance, or by an EDPB accredited veterinary surgeon.

The controls proposed are similar to those that have been in operation among our members for a long time. We can provide a list a veterinary surgeons who can attest to the fact that this system of controls works extremely well.
