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To: [Cosmetic Surgery Review](#)
Subject: Submission to the independent review on cosmetic surgery
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[image002.png](#)
[image003.png](#)
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[Medical practitioners' use of the title surgeon under the National Law - cosigned ADA, ADC and RACDS.pdf](#)

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Dear Secretariat

The ADA has recently made a submission to the Use of the title surgeon by medical practitioners in the Health Regulation National Law conducted by the NRAS Review implementation Project team on behalf of Health Ministers.

We note that the Consultation paper on the Independent review of the regulation of health practitioners in cosmetic surgery recognises that there are a vast array of cosmetic procedures and treatments being undertaken in the community by registered practitioners such as dentists. Further it notes, that while not directly part of the terms of references of the review, learnings from the review may have broader relevance for the National Scheme. The ADA therefore thought it was relevant to share with the panel the joint submission from the ADA, the Royal Australasian College of Dental Surgeons and the Australian Dental Association to the NRAS review so that the concerns outlined might also be considered as part of this process.

Please do not hesitate to get in touch with me should you require any further information.

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In the spirit of reconciliation, the Australian Dental Association acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

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29 March 2022

The Manager
NRAS Review Implementation Project Team
50 Lonsdale St
Melbourne VIC 3000

By email: [REDACTED]

Dear Sir or Madam,

Re: Medical practitioners' use of the title surgeon under the National Law

Thank you for inviting the Australian Dental Association (ADA) to provide feedback on the Consultation Regulation Impact Statement: *Use of the title 'surgeon' by medical practitioners in the Health Practitioner Regulation National Law*, published December 2021 (RIS).

In preparing this document, the ADA consulted the Australian Dental Council (ADC) and the Royal Australasian College of Dental Surgeons (RACDS). Both organisations have endorsed its contents.

About us

The ADA is the peak representative body for dentists in Australia. Our 17,000 members include dentists who work across both the public and private sectors, across 14 specialty areas of practice, in education and research roles, and dentistry students currently completing their entry-to-practice qualification.

The ADC works to protect the health and safety of the public by ensuring dental practitioners meet the high standards required of dental professionals in Australia. It is an independent accreditation authority assigned the accreditation functions for the dental professions by the Dental Board of Australia under the National Registration and Accreditation Scheme (NRAS).

The RACDS is a member-based organisation comprising more than 3,000 dentists and surgeons from Australasia and beyond. A not-for-profit organisation, its aim and purpose is to provide a community for exceptional dentists to gain access to ongoing development of their clinical skills, forge a supportive network of peers, mentors and mentees, and promote the improvement of oral health in the community.

Context for our comments

We appreciate health ministers' interest in consulting on medical practitioners' use of the title surgeon, including cosmetic surgeon, under the Health Practitioner Regulation National Law. We understand consumers may experience confusion around the use of title surgeon, notably in the field of cosmetic surgery.

We note that the RIS focuses on cosmetic surgery performed by medical practitioners and does not explore surgery that is performed by dentists.

Our comments herein are limited mainly to aspects directly relevant to the dentist profession.

Dental surgeons

Dentists are commonly known as dental surgeons and this title reflects their education and training. To practice, dentists complete accredited degrees including Bachelor of Dental Surgery (BDS) or Doctor of Dental Surgery (DDS) in Australia, or programs of studies overseas that are recognised as equivalent by the Dental Board of Australia. Dentists have sufficient skills, knowledge, and competence to perform dental surgery on graduation.

The term dental surgeon is also in regular use amongst the dental profession and public in Australia and overseas. Referring to a dental practice as a dental surgery is similarly usual.

Much of the work dentists perform can be classified as surgery. i.e., periapical, and periodontal surgery, extractions, implants, endodontics, and even simple operative dentistry which involves removal and restoration of diseased tissue. Dentists also perform cosmetic procedures, including the use of dermal fillers and anti-wrinkle injectables.

Restricting the title surgeon under the National Law

It is important to recognise that the title surgeon is not limited to medical practitioners. The specialties of oral surgery and oral and maxillofacial surgery, as noted in the RIS, are recognised with protected titles. We are concerned that restricting the title surgeon under the National Law could affect most dentists, who currently refer to themselves as dental surgeons.

Because dentists are trained in surgical procedures from a registration perspective, they should retain an entitlement to refer to themselves as dental surgeons; via the establishment of protected title(s) if that were to become necessary.

Effects of restricting the title surgeon on outbound cosmetic medical tourism

We note the concerns raised in the RIS on the potential to increase cosmetic medical tourism and this is an issue that also concerns us. Many Australians have travelled abroad¹ for dental treatment, without fully appreciating risks involved with being treated outside Australia.

Treatment may be cheaper overseas, but consumers may not understand the importance of considering the potential complications and adverse outcomes that could need to be addressed after returning to Australia. In some cases, dental products used overseas are not approved for use in Australia, and if follow-up treatment is required, those products might need to be removed and the whole procedure redone.

We consider that dental treatment for Australian residents is best completed in Australia, where they can be assured of the safety and quality standards in place, and of accessibility to follow-up care. NRAS may like to consider if a similar position is appropriate for cosmetic surgery.

¹ Prior to the outbreak of COVID-19

Concluding remarks

We support consumers' rights to understand cosmetic surgeons' qualifications. The public is likely to be influenced by or misconstrue the significance of the term surgeon and may not understand a practitioner's qualifications, experience, or skills. The public is also likely to be influenced by marketing strategies promoted via social media.

We believe there should be greater transparency around the training and qualifications of practitioners who perform surgical procedures.

However, we are concerned about unintended consequences that could flow within the dental profession from restricting the use of the title surgeon. Accordingly, if the NRAS project team intends to recommend, or health ministers decide to pursue such an approach, we emphasise the need for targeted further consultation with our organisations to ensure there are no unintended consequences for dental surgeons.

The ADA is happy to expand on any or all the comments provided. Should you have any questions, please do not hesitate to contact [REDACTED], ADA Chief Executive Officer, on [REDACTED].

Yours sincerely



Dr R Mark Hutton
President



Prof Ian Meyers OAM
President



Royal Australasian College
of Dental Surgeons
Let knowledge conquer disease



Professor Chris Peck
Chair

