

Inquiry into the Animal Care and Protection Amendment Bill 2022

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Too Whom it May Concern

A Case for Recognition of Non-Veterinary Equine Dentists

31/05/22

I am an Equine Dentist who holds a Cert IV in Equine Dentistry which was gained from the TAFE/University of Western Sydney.

In my view there are areas of conflict in the Animal Care and Welfare legislation. As legislation is not my area of expertise, I will happily accept any help and advice regarding the subject. There are number of actions which are in conflict with Hilmer recommendations. Namely restricting trade by way of monopolisation and freedom of choice is nonexistent.

I will be placing my views as suggestions.

We hear regularly "do no harm", that is a wonderful mantra however that is not always the case as there are restrictions in place which prevent the mantra from being carried out in full. These restrictions will be greatly minimised by granting special exceptions with a criterion. These criterion can be achieved with education. When considering the above issues, a process already exists with health. In health we have *RIPERN nurses and *Nurse Practitioners these people work with in the Health Act guide lines. In animal care we have *Pound keepers and *Deer breeders.

For Equine Dentists an avenue for sedation will be a great help. With sedation a great number of problems will not be relevant

Harm under current legislation

Working with horses - on the lower end of the scale we have the compliant happy horse however on the other end we have the non-compliant fractious horse. On the upper end of this scale the possibilities of harm to horse and human are great and there is a need to manage this risk to an acceptable limit.

Regarding Equine Dentistry there are two forms of harm which are constantly monitored and managed by the dental practitioner to reduce harm. The situation becomes very grave when a fractious and dangerous horse is encountered *Harm to horse *Harm to handlers and practitioner not to mention the mental harm to the horse. With sedation this situation can be managed and the risk mitigated.

Harm for the horses, at one end of the scale there is severe stress, resulting in a very traumatic experience or maimed by injury. On the other end of the scale an injury resulting in a euthanized horse.

Harm to the practitioner and or handlers there are a myriad of personal injuries, one cannot imagine, can occur with an uncontrolled fractious horse.

With regard to working with fractious horses the following Qld Acts are treated in a derelict manner. As we are not 100% sure of the horse's actions during the dental consultation.

*Work Place Health and Safety Act 2011 *Animal Care and Protection Act 2001

There is no need to go back to the barbaric days of the light horse era of restraining with ropes and hobbles, in extreme cases throwing the horse on the ground.

The Proposal to Address the Harm

These situations can be controlled - harm reduced, made safe with procedures performed on these dangerous horses by having them relaxed and stress free. This can be achieved by the legal use of sedation for the Non-Veterinary Equine Dentist. The Non-Veterinary Dentist is well on the way with having been trained to the Cert IV standard. The way forward here is to be qualified and registered for the legal use of sedation.

Regarding the Non-Veterinary Equine Dentists if they have a formal structure to comply with, the black markets involved with equine dentistry will be greatly diminished. The reason for this black-market reduction, nearly all people will enjoy a peace of mind of being involved with a formal legal structure and be compliant to acts and legislation.

By having these restrictions modified the public will have a freedom of choice. The issues which Hilmer identified will be addressed hence the Non-Veterinary Equine Dentists can trade without impediments, the Competition and Consumer Act 2010 Part IV Restrictive Trade Practices will be adequately complied with.

As the Non-Veterinary Equine Dentists are now restricted with their dental practice, this is clearly outside Hilmer's guide lines. Restricting trade by way of monopolisation, we have a situation of market control. The monopolisation can be rectified by training and registering the Non-Veterinary Equine Dentists, this situation will give the general public a freedom of choice of which they do not have at the moment.

With training and qualification, the Non-Veterinary Equine Dentist will be compliant with the Health Act regarding Schedule 4 drugs.

Guidance to recognised integrity

CertIV trained and qualified in Equine Dentistry and delivered by Recognised Training Organisation in Australia, this exists.

WWAED. Code of conduct (Only a suggestion)

WWAED. Standard of Practice. (Only a suggestion)

Disciplinary Procedures for Non-Veterinary Dentists: - Covered under the Animal Welfare Act.

Qualification is maintained by way of recognised, Continued Learning

Professional organisation WWAED. (AusAsia) (Only suggestion)

Legislation which is current

Australia:-

*RIPERN nurses:-(Rural Isolated Endorsed Registered Nurse). These nurses are registered within the human medical fields. Their registrations allow them to carry, prescribe and administer S4 drugs including S8.

*Nurse Practitioners:-In the human medical fields these nurses are (Registered) trained and qualified to perform medical procedures which are performed by medical practitioners. (Doctors).

*Pound keepers

*Deer Breeders

United Kingdom:-

*BEVA (British Equine Veterinary Association)

Sedation use and competency

Include the sedation unit with the CertIV or have a separate short course for the training of administering and storing the sedation. With the CertIV qualification and or training, the holder will be recognised for registration for administering, storing and possession for sedation drugs.

There is a need for the administration of S4 type sedatives to be included in the qualification for Equine Dentistry. So that the practicing Equine Dentist is educated for the 'Necessary Specific Knowledge to Administer and Sedative the Horse of which they are working with.

A great deal of my work is in remote Qld. Some of these places are over an hour plus and more quite regularly from the nearest vet, or only have an attending vet in town one day a week or never. Organising a vet to come out and sedate horses is not only a poor use of their time and skill, but also expensive for the client. Even in the Veterinary field there are specialists. There is a lot to be said for the knowledge gained from doing something every day, that is Non-Veterinary Equine Dentists.

Another avenue for harm which is very common in these remote areas, insufficient dental work performed as a great deal of Dentists can only do what the horse allows, and they cannot do what dental work is needed because the horse is too fractious and dangerous. For me personally and which is such a sad outcome, "Just wish him all the best". This is not a good outcome.

As the Non-Veterinary dentist are not trained surgeons there will be no need for an anaesthetists unit within the curriculum - just sedation. My suggestion at this point there will no need for surgery as the non-veterinary dentists have no surgery qualifications.

The registered user of the sedation may need to keep a log book of frequency and use of the sedation, suggestion for a way forward.

Discussion regarding power instruments

Power instruments. This is a great avenue for harm. For a start there is a need for a set of national governing principals covering the use of power instruments, no exemptions. The principals of use and the types and makes of power instrument are so broad, the subject of power cannot be covered in a short duration, there needs to be practical experience involved with this subject.

(A personal view: - there is a great need for anatomy revision) "View of Author".

There needs to be a situation where one can compare apples with apples as *techniques *views *instruments are so varied.

There is a thorough need for an education system delivered by a national education structure as there are a great number of urban myths and misconceptions regarding power instruments.

I believe no one should be exempt.

If you need more information or clarify points, please do not hesitate to contact me on the above address of phone.

Thank you reading my views.