



**AUSTRALIAN DENTAL
ASSOCIATION INC.**

Incorporated in the ACT ARBN 131 755 989

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All Correspondence to:
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7 November 2014

Dr Chris Bourke MLA
Chair
Standing Committee on Health, Ageing, Community and Social Services
ACT Legislative Assembly
GPO Box 1020
Canberra ACT 2601

By email: committees@parliament.act.gov.au

Dear Dr Bourke

Re: Inquiry into sourcing and supply of dental appliances and related products

Thank you for your letter dated 19 August 2014 inviting the Australian Dental Association (ADA) to contribute to the ACT Legislative Assembly's inquiry into the sourcing and supply of dental prostheses.

The ADA notes the terms of reference of the inquiry but rather than respond to each of these individually, wishes to provide the following general advice.

As recorded by the Dental Board of Australia in its June 2014 quarterly statistics report, there are 285 dentists and 15 dental prosthetists registered to practice in the ACT. There are no current data on the number of dental technicians or dental laboratories located in the ACT.

Australian dental laboratories are regulated by the business constraints of Federal, State and Local Government legislation. These regulations address occupational health and safety, infection control, quality of materials used and waste management.

The ADA is aware that some Australian dental laboratories and dentists source custom-made dental prostheses and appliances from overseas and that the constraints applying to Australian dental laboratories may not apply to overseas laboratories. However, there are many overseas laboratories that do comply with ISO standards. Also there are some custom-made dental prostheses options only available from overseas laboratories and manufacturers.

The ADA believes in relation to custom-made dental prostheses and appliances, the health and safety of the patient is paramount. As stated in ADA Policy Statement 6.12 *Custom-Made Dental Prostheses and Appliances*, the ADA acknowledges that dentists and dental prosthetists have a responsibility to ensure all materials used in such devices comply with Therapeutics Goods (Medical Devices) Regulations 2002 and its amendments (TGR 2002). Under the registration requirements dentists and dental prosthetists as independent practitioners are responsible for all treatment they provide to patients including the fitting of custom-made dental prostheses and appliances.

Similarly, dental laboratories and suppliers of custom-made dental prostheses and appliances have a responsibility to ensure and guarantee that laboratory work complies with TGR 2002 and all materials used in custom-made dental prostheses and appliances, wherever sourced, must comply with standards published by the International Organisation for Standardisation. The ADA also recommends that the origins of all dental prostheses and appliances should be identified.

Australian Governments support free-trade agreements and universal application of competition policy. Currently, there is no reported evidence that the ADA is aware of to suggest the quality of products used in dental prostheses and appliances differs depending on whether or not it was supplied in Australia or sourced from an overseas supplier.

The ADA is also aware some Australian laboratories are sending their work offshore even though they are Australian registered companies and the ADA is not aware of any complaints from dentists in relation to the quality of products used.

The responsibility for ensuring a prostheses is fit for purpose clearly rests with the dentist but the Standing Committee may wish to consider a recommendation placing an onus on the laboratory to declare to a dentist if a prostheses was made overseas.

However, the Standing Committee must be mindful of the implications of such a recommendation. The cost of dental materials is a significant factor in the production of prostheses and appliances so care must be taken not to introduce a system that will increase the cost for consumers especially when there is no firm evidence to indicate the current system is not protecting patients.

Representatives from the Australian Dental Association can be available to participate in a hearing if required. Please contact ADA CEO, Mr Robert Boyd-Boland ceo@ada.org.au or 02 9906 4412, if you require any further information.

Yours sincerely,

A handwritten signature in black ink that reads "K Alexander". The signature is written in a cursive, flowing style.

Dr Karin Alexander
President