



AUSTRALIAN DENTAL  
ASSOCIATION INC.

75 Lithgow Street St Leonards NSW 2065  
Postal Address  
PO Box 520 St Leonards NSW 1590  
Telephone (02) 9906 4412  
Facsimile Executive (02) 9906 4736  
Administration (02) 9906 4676  
Publications (02) 9906 4917  
E-mail [adainc@ada.org.au](mailto:adainc@ada.org.au)  
Website [www.ada.org.au](http://www.ada.org.au)

26 April 2006

Productivity Commission  
Standards and Accreditation Study  
Productivity Commission  
PO Box 80  
Belconnen ACT 2616  
Email: [standards@pc.gov.au](mailto:standards@pc.gov.au)

**Re: Productivity Commission Research Study – Standards and Accreditation**

The Australian Dental Association (ADA) is pleased to respond to the Productivity Commission's request for submissions to its study into the relationship between the Australian Government and Standards Australia and the National Association of Testing Authorities, Australia (NATA). The ADA's comments specifically relate to Standards Australia.

The Australian Dental Association Inc. (ADA) represents approximately 9,500 registered dental practitioners in Australia, which is over 90% of all dentists. The primary objective of the ADA is to encourage the improvement of the health of the public and to promote the art and science of dentistry.

As the professional body representing dentists in Australia, the ADA has been an active participant in the promotion of standards by providing representation to assist Standards Australia to develop standards.

The ADA is concerned that the mode of operation of Standards Australia is somewhat at odds with what such organisations should seek achieve. The ADA believes that Standards Australia – theoretically created to improve the welfare of the community – is being hindered in achieving this objective by virtue of their 'privatisation' (or required mode of operation) and its desire to maintain profitability.

Standards Australia provides a valuable service in the creation of standards which the ADA assumes are designed to provide benchmarks for certain practices. Such benchmarks are developed to lift standards of practice to a level higher than those that currently exist. With this in mind the ADA is critical

of the way in which the contents of the standards are made available to the public or sectors of the community desirous of utilising them.

For example, if we consider AS/NZS 4187: 'Cleaning, disinfecting and sterilizing reusable medical and surgical instruments and equipment, and maintenance of associated environments in health care facilities': the ADA and its members made a significant contribution to the development of this standard. Such service is provided to encourage the improvement of the health of the public and to promote the art and science of dentistry, as is consistent with the very objectives of the ADA. The ADA and its members provided this contribution freely and without any monetary receipt. This standard provides criteria for infection control to be followed by dentists. If the standard creates, as it no doubt aspired to do, a new and desired benchmark for such practice, the ADA questions whether its is necessary for dentists, registration boards and others to be required to purchase such standards.

If the motive for the creation of standards is to improve practices then every effort should be made to ensure this occurs. The ADA objects to the creation of barriers to achieve this and believes standards should be made available at no cost to those that need to be guided by them. Currently, members of the ADA – who contributed freely to the development of the standard – are being required to outlay funds to ensure full compliance of their practices. The need to purchase standards no doubt arises as the structure of Standards Australia requires financial return. The ADA questions why this motive should exist in an organisation that has at its essence the altruistic objective of improving standards for the community.

The ADA suggests that either greater recognition should be provided to persons and/or organisations who donate their time to the creation of the standards or alternatively the delivery of the contents of the standards be more readily and freely available to the users of the standards. Otherwise the ADA sees that organisations such as Standards Australia are not fulfilling the reason for their existence.

Yours sincerely,

[signed]

**Authorised by  
W J O'Reilly  
Federal President**