



Mutual Recognition Schemes

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The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 5800 members, and branches in each state and territory. DAA is a leader in nutrition and advocates for better food, better health, and wellbeing for all. DAA appreciates the opportunity to provide feedback on the Mutual Recognition Schemes Issues Paper by the Australian Government Productivity Commission.

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DAA interest in this consultation

DAA is the peak body for dietitians in Australia. DAA accredits university training courses in Australia and is the assessing authority for dietitians trained overseas who seek to work in Australia.

The Accredited Practising Dietitian (APD) program is the foundation of DAA as a self regulated profession with 98 percent of eligible members participating in the program. The APD credential is recognised by Medicare, the Department of Veterans Affairs, private health funds and for access to the Healthcare Identifiers Service.

APDs in Australia practise at a level commensurate with other leading countries including Canada, Britain, the United States of America, and New Zealand. As an organisation DAA contributes significantly to international dietetic practice through the International Confederation of Dietetic Associations and through other collaborations, such as *Practise Based Evidence in Nutrition (PEN)* dynamic knowledge translation subscription service.

Recommendations

DAA contends that professions which are self regulated at a level similar to that of Australian Health Practitioner Regulation Agency should enjoy the same government support to pursue mutual recognition as do the professions registered in Australia.

Discussion

DAA has successfully developed and maintained mutual recognition schemes, starting with New Zealand in 2007, and followed by Canada in 2012. The Association has also opened discussions with dietetic authorities in other countries.

Benefits to dietetic profession in Australia

One of the benefits of mutual recognition is that it facilitates recruitment of senior practitioners to positions in Australia with training and experience which is relevant to Australia. Historically recruitment to senior positions in hospital settings has been difficult, and more recently in academic settings due to the increasing number of universities offering dietetic training courses in Australia and lack of APDs at the required level to lead dietetic training. Overseas employers value the skills and knowledge of Australian APDs, and readily employ APDs when they are available.

Individual dietitians benefit by having less costly, onerous and lengthy processes to satisfy where mutual recognition is available as has been the case in Canada. Conversely and in the absence of mutual recognition, dietitians wishing to work in California must undertake part-time study for approximately one year, compete for a place in and complete an internship of 6 – 9 months, and successfully sit the Registered Dietitian examination. [As a non resident](#) this would cost approximately \$20,000 per year.

Mutual recognition with New Zealand

DAA and the New Zealand Dietitians Board entered into a Voluntary Relationship Charter for the Mutual Recognition of Dietetic Standards in 2007. This Charter means that Australian APDs and New Zealand Registered Dietitians with an Annual Practising Certificate will now be eligible to work in either country by completing a simple application process. A total of 45 New Zealand Registered Dietitians have successfully applied for practice in Australia, with 44 of these joining the APD program. There was a spike of applications in 2011 after the Christchurch earthquake.

More detail on mutual recognition with New Zealand is available on the [DAA website](#).

Mutual recognition with Canada

In 2012 DAA and nine of the ten provincial dietetic regulatory bodies of Canada, referred to as the Alliance of Canadian Dietetic Regulatory Bodies, entered into a Charter to mutually recognise dietitians who are registered or credentialed in Australia and Canada.

The Mutual Recognition Voluntary Relationship Charter applies to dietitians with full APD status in Australia, and Registered Dietitians in Canada who hold a current General or Full Certificate of Registration and who have practised as a dietitian for at least twelve months.

More detail on mutual recognition with Canada is available on the [DAA website](#).

Coregulatory, de facto and negative occupational licensing

The discussion paper states that “mutual recognition clearly applies to occupations that are covered by legislative licensing schemes, there is some uncertainty about whether or not this includes forms of occupational regulation with no statutory registration authority, such as coregulatory, de facto and negative licensing arrangements.”

The dietetic profession in Australia is self regulated, rather than being regulated under the Australian Health Practitioner Regulation Agency. The implementation of the National Registration and Accreditation Scheme has had a number of untoward consequences for the dietetic profession, and similarly self regulated professions, which operate at a level similar to those registered under the Australian Health Practitioner Regulation Agency. The uncertainty for mutual recognition purposes described in this paper appears to be yet another untoward consequence for professions which represent approximately 25 percent of the Australian healthcare workforce.

Through rigorous self regulation over more than 20 years, DAA has demonstrated an ability to provide assurance for the public about safety and quality, and has ensured workforce mobility within Australia. More recently it successfully negotiated arrangements for mutual recognition internationally, even where dietitians in other countries are registered by legislation. In New Zealand this was less complex, as the authority concerned was a single entity, the New Zealand Dietetic Board. However, in Canada a more complex situation required negotiation with ten provincial bodies.

DAA contends that professions which are self regulated at a level similar to that of Australian Health Practitioner Regulation Agency should enjoy the same government support to pursue mutual recognition as do the professions registered in Australia. This support would include thorough knowledge of the health professional regulation environment by agents of the Australian Government, and access to funding opportunities to defray the costs of establishing mutual recognition arrangements.

Costs

The cost to professional bodies of establishing mutual recognition includes professional time to thoroughly investigate aspects of academic preparation and professional experience for both parties entering mutual recognition, international communication, international travel for meetings, and legal advice.

Automatic mutual recognition

Negotiating mutual recognition arrangements can be complex and lengthy in the experience of DAA, even where goodwill prevails and the level of practice in each country is considered to be at a similar level. It is important that processes for mutual recognition ensure that individual practitioners are able to satisfy the requirements for safe and competent practice, and that risks to public safety have been adequately addressed.

DAA has been the assessing authority for the Australian Government for dietitians trained overseas for a number of years. This has provided insight into various levels of practice due to various standards of academic preparation and professional experience in other countries. This has implications for public safety and for this reasons DAA is not supportive of automatic mutual recognition.