02 October 2024 Dr Anne Tonkin AO

Chair Medical Board of Australia



Dear Dr Tonkin,

Re: The title of Oral surgeon

According to the Health Ministers Meeting Communique 16 August 2024, "Health Ministers have agreed to refer the use of the title 'Oral Surgeon' to the AHPRA for consideration and advice, to ensure patients and consumers have a clear understanding of the skills and qualifications of the practitioners providing them care."

We assume that the advice AHPRA would be considering on this matter would include advice from the medical Board of Australia, and hence this letter.

The Council of Procedural Specialists (COPS) is committed to the maintenance of appropriate standards of medical and surgical training and accreditation.

As you are aware the issue regarding the use of the term 'surgeon' has recently been investigated in regard to medical practitioners who are not trained as surgeons (not holding a medical surgical fellowship) performing cosmetic surgery procedures.

However, the inquiry by the Qld Parliament did not include investigation of the use of the term surgeon by non-medical practitioners, such as podiatric and oral surgeons. COPS believes that this was an omission in the parliamentary inquiry's desire to act in the interest of protection of the public.

If use of the title surgeon by medically qualified non-surgically trained medical practitioners is confusing to the public, surely the use of the title surgeon by non-medically trained health professionals would be equally confusing and misleading.

For this reason, COPS believes that only those with a medical surgical fellowship awarded by a surgical training program accredited by the AMC should be entitled to use the title surgeon in regard to any procedure involving intervention into the body by surgical means.

The Council of Procedural Specialists makes the following recommendations to protect the public.

- 1. That the title 'oral surgeon' be withdrawn, as it is obvious that a member of the public would have considerable difficulty distinguishing between the qualifications of an 'Oral surgeon' and an 'Oral & Maxillofacial surgeon'.
- 2. COPS has no recommendation as to what an alternative title should be, other than that it should not include the word 'surgeon'.

COPS maintains that surgery should be performed by practitioners who have a comprehensive education in whole body systems and competencies in surgery which have been recognised by a surgical training program accredited by the AMC. This would be consistent with recent changes in cosmetic surgery designed to ensure that the public is not misled by titles which imply that AMC accredited medical and surgical training has been completed when it has not.

Thank you for consideration of our correspondence on this important issue.

Yours sincerely,

A/Prof David Scott OAM

Chair, Council of Procedural Specialists



Mr Stephen Milgate AM

CEO, Council of Procedural Specialists