

Thank you for the opportunity to comment during the “rule making” process on this rather crucial matter affecting the safe provision of dental healthcare services to our community. I believe that private general dental practices in New Zealand provide a significant percentage of oral healthcare to our community. The operators of GDPs and their professional staff feel under represented at policy/regulation level and their concerns about the practical and economic viability of private GD practice are at best unheard. That said I have welcomed this draft of this IPC supplement as a practical and workable set of protocols. I was pleasantly surprised to see comment about “supply chain” difficulties and environmental impact of generated waste being considered. These are real world issues we are facing daily.

The IPC supplement I’m sure will be getting some “polish” before implementation. I would like to see some consideration for the following:

- A definition with examples of what a “Fluid resistant gown” is, and is not.
- HVE...there is overwhelming evidence that reducing aerosols at the source is as or more effective than extractors, ACHs, filters and PPE. HVE use cannot be emphasized enough for general dentistry but also for dental hygiene practice where the operator is often working solo. I can tell you this is taking some working out and is going to greatly affect the provision of dental hygiene services by solo operators.
- Fig 2 of the draft: We will be using this flow chart to script our screening, interviewing and emails to patients. The box “Presentation of a valid My Vax Pass” should include “or a valid negative <72hr PCR test” to simplify the conversations.

I look forward to receive and work with the final document.

Thank you again for your hard work and the early insight to the upcoming changes. I am looking forward to being considered and consulted with on the matter of “Room ventilation” requirements.

Yours sincerely

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