



ANZCA
FPM

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Medical Board of Australia

Via email: medboardconsultation@ahpra.gov.au

Dear Medical Board,

Public consultation on competent authority pathway to general registration for international medical graduates – ANZCA feedback

The Australian and New Zealand College of Anaesthetists (ANZCA) appreciates the opportunity to provide feedback on this consultation. ANZCA supports measures that enhance transparency, consistency and public confidence in registration processes while maintaining robust standards for patient safety and quality of care.

General comments

ANZCA supports the proposal to formalise the Competent Authority pathway through a registration standard. The proposed approach improves clarity, transparency and consistency by aligning the pathway with the Health Practitioner Regulation National Law and providing a clear regulatory framework for eligibility and registration requirements. We agree that formally documenting requirements that have historically existed through policy and guidance materials will increase certainty for applicants, employers and regulators.

ANZCA also supports the proposal to require completion of a Board-approved orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education. These requirements contribute to safe and culturally responsive practice and are consistent with broader regulatory expectations for medical practitioners entering the Australian health system.

Areas of general support

ANZCA supports efforts to streamline Medical Board of Australia and Australian Health Practitioner Regulation Agency (Ahpra) processes where the objectives of registration can be reliably met through equivalent assessment and supervised practice arrangements in jurisdictions with well-established and comparable regulatory systems, particularly New Zealand, the United Kingdom and Ireland.

We acknowledge that the educational assessment component of the Competent Authority pathway is generally robust. In many competent authority jurisdictions, the equivalent of the Australian Medical Council (AMC) examination is demonstrated either through graduation from a medical program accredited by a trusted regulatory body or through successful completion of a national licensing examination for international graduates, such as the Professional and Linguistic Assessments Board (PLAB) examination in the United Kingdom or the New Zealand Registration Examination (NZREX). This provides a reasonable basis for recognising equivalence in medical knowledge and clinical assessment.

Similarly, ANZCA supports recognition of supervised practice requirements that are demonstrably equivalent to the Australian internship model, including:

- Foundation Year 1 in the United Kingdom,
- the New Zealand rotating internship, including multiple accredited clinical attachments, and
- the Irish internship year.

These programs provide broad-based supervised clinical exposure across a range of disciplines and support the development of foundational clinical judgement and professional practice skills expected of practitioners seeking general registration.

Importance of broad-based internship experience

However, ANZCA has reservations regarding the proposed increase in flexibility once eligibility extends beyond New Zealand, the United Kingdom and Ireland, particularly in relation to the supervised practice component.

While the educational assessment component may be broadly comparable across a number of jurisdictions, there is substantially greater variability in the nature and scope of internship-equivalent training. ANZCA considers that a fundamental objective of general registration should be demonstration that a medical practitioner has completed at least one year of supervised postgraduate clinical practice across a range of medical disciplines, including exposure to general medicine and surgery.

This broad-based experience remains critically important. Australian patients increasingly present with multiple chronic conditions affecting several body systems. Doctors entering general registration should therefore possess a holistic understanding of patient care and the management of complex, multisystem disease rather than training confined largely to a single specialty or organ system.

ANZCA notes that:

- In **Canada**, the required 12 months of postgraduate education or residency training may occur within a single specialty stream because specialty residency commences immediately following graduation.
- In the **United States**, eligibility is based on completion of a minimum of two years of accredited graduate medical education, which similarly begins directly after medical school and may not provide broad internship-style rotations across a variety of clinical disciplines.
- Under the proposed changes for the **United Kingdom**, applicants may qualify following 12 months of supervised training that is described as an internship equivalent, but without explicit requirements regarding the breadth of clinical experience.

While these pathways may appropriately demonstrate medical competence in their local contexts, ANZCA is not convinced they consistently replicate the breadth of training historically associated with internship and early postgraduate practice in Australia and New Zealand.

Concerns regarding offshore internships

ANZCA is also concerned about the proposed recognition of eligible offshore internships under Categories A and B. The consultation paper proposes that completion of a GMC-affiliated offshore Foundation Year 1 program, together with 12 months' practice in the United Kingdom or another competent authority country, may satisfy eligibility requirements.

While we recognise that these offshore programs are quality assured through the General Medical Council framework, ANZCA considers that additional safeguards may be warranted.

In particular, the requirement for a subsequent 12 months of practice in the United Kingdom or another competent authority country does not clearly specify:

- the nature of the clinical practice undertaken,
- the breadth of clinical exposure,
- the level of supervision provided, or
- whether the practice is equivalent to internship-level experience across multiple disciplines.

Without greater specificity, there is a risk that practitioners could satisfy pathway requirements through experience that is substantially narrower than that traditionally expected of doctors entering general registration in Australia.

Maintaining the reliability of the Competent Authority pathway

The Competent Authority pathway has historically been regarded as a reliable and efficient pathway because it relies on trusted jurisdictions with demonstrably comparable education, assessment and supervised practice arrangements. ANZCA supports reasonable flexibility where equivalence can be clearly demonstrated. However, we caution against incremental expansion of eligibility criteria that may reduce confidence in the pathway's comparability and reliability.

There must remain a clear threshold at which the complexity and variability of an applicant's educational and clinical training history make assessment through the Standard pathway more appropriate. The Standard pathway provides additional verification and assessment mechanisms that may be necessary where equivalence cannot be confidently established.

Accordingly, ANZCA encourages the Board to:

1. Maintain clear and rigorous requirements concerning internship-equivalent clinical experiences.
2. Explicitly define minimum expectations regarding breadth of clinical exposure and supervision for recognised offshore internships and subsequent practice periods.
3. Continue to require evidence of broad-based supervised postgraduate training across multiple clinical disciplines as a prerequisite for general registration.
4. Consider whether applicants whose internship-equivalent experience differs significantly from the Australian model should instead progress through the Standard pathway.

Conclusion

ANZCA supports the formalisation of the Competent Authority pathway, the proposed registration standard, the requirement for orientation to the Australian healthcare system, and Aboriginal and Torres Strait Islander cultural safety education. ANZCA also supports streamlining registration processes where equivalence can be clearly demonstrated through established and trusted regulatory systems.

However, we encourage the Board to proceed cautiously with proposed expansions to Categories A and B involving offshore internships and more flexible supervised practice arrangements. Ensuring that all applicants for general registration have completed broad-based supervised postgraduate clinical experience remains essential to maintaining public safety, professional standards and confidence in the Competent Authority pathway.

Thank you for considering ANZCA's submission.

Yours sincerely,



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