



ANZCA

FPM

4 September 2026

Kirsty White
Chief Operating Officer
Australian Medical Council (AMC)

Via email: recognition@amc.org.au

CEO

Australian and New Zealand
College of Anaesthetists

Dear Kirsty,

Proposed revisions to the Guidelines for the Recognition of Medical Specialties and Fields of Specialty Practice under the National Law

Thank you for opportunity to provide feedback on this revised guideline. The Australian and New Zealand College of Anaesthetists (ANZCA) supports the clearer delineation of the process for considering proposals for new specialties and fields of specialty practice. The inclusion of flow charts and clearer descriptions of the roles and decision-making responsibilities of the various bodies involved improves transparency and will assist stakeholders in understanding the process and requirements.

ANZCA supports maintaining a high threshold for the introduction of new specialties. Contemporary patient care often involves complex conditions that require coordinated care across multiple medical specialties. While specialist expertise is essential, increasing fragmentation of the medical workforce can create additional challenges for coordinating care and navigating the health system for patients and their families. It is therefore appropriate that proposals for new specialties demonstrate a clear public benefit that outweighs any potential risks of further siloing of healthcare delivery.

The term 'workforce mobility' is used a number of times through the document. The term may be interpreted in a number of ways and for different purposes, including the ability of specialists to move between geographical locations (for example, metropolitan, regional and rural settings), between healthcare settings (public, private and community-based care), or between related scopes of practice and service models. Clarifying the intended meaning and how workforce mobility will be assessed would assist applicants and stakeholders in understanding this criterion and ensuring proposals appropriately consider workforce flexibility and service accessibility.

In Appendix 1, Item 4 (Existing Professional Standards), ANZCA notes the reference to continuing professional development (CPD) alongside education and training programs. Given the importance of CPD in maintaining specialist competence and supporting lifelong learning, ANZCA recommends that CPD be explicitly recognised as an integral component of any proposal for a new specialty or field of specialty practice and considered alongside educational and training requirements.

In Appendix 1, Item 5 (Impact), ANZCA recommends that consultation requirements extend beyond colleges with an identified overlap in scope of practice. Modern healthcare is highly interconnected, with patient care delivered across multiple specialties working collaboratively. Changes affecting one specialty can have broader implications across the health system, including workforce, training, service delivery and patient care. For this reason, ANZCA considers that all specialist medical colleges should be consulted as part

of the assessment process to ensure potential impacts are fully understood and considered.

Overall, ANZCA supports the intent of the guidance and its focus on ensuring that any proposal for a new specialty or field of specialty practice demonstrates a clear benefit to patients, the health system and the community.

Yours sincerely

A handwritten signature in black ink, consisting of a stylized 'L' followed by a horizontal line.

Dr Lance Emerson
Chief Executive Officer