

4 September 2026

Dr Ken Clark
Tumuaki | Chair
Te Kaunihera Rata o Aotearoa | Medical Council of New Zealand

Tēnā koe Dr Clark

Re - Draft Policy for doctors who wish to perform cosmetic procedures

Thank your correspondence on 12 August regarding the revised draft of the *Policy for doctors who wish to perform cosmetic procedures (August 2026)*. We appreciate the Council's on-going engagement on this matter, and it was positive to see the presentation on this work at your Annual Meeting with Medical Colleges and Stakeholders on 18 August.

Since receiving the revised draft, we have met with the New Zealand Association of Plastic Surgeons (NZAPS) and Australasian Society of Aesthetic Plastic Surgeons (ASAPS) to review the changes. Our organisations agreed the revised draft represents significant progress over the 2017 policy and wanted to acknowledge the positive and constructive engagement from the Council throughout this consultation process.

Before the draft is finalised, RACS has a number of recommendations for consideration by Council. We have also seen copies of both NZAPS' and ASAPS' submissions to MCNZ on this recent draft, and endorse their feedback, particularly where it overlaps with our own.

The overarching purpose of this policy is to protect patient safety by ensuring procedures are performed by doctors with the appropriate degree of training and experience. In general, we support the use of the four-category framework to recognise risk and dictate the degree of training required for each category of procedure. However we believe Category A, which represents complex surgical procedures and presents the highest degree of risk to patient safety, would benefit from some additional clarity given that doctors registered in the vocational scope of dermatology may perform some, but not all, procedures in this class.

Clause 16 of the draft policy specifies that a doctor registered in the vocational scope of dermatology may perform non-visceral and non-structural complex surgical cosmetic procedures under certain conditions. We believe the addition of the word "only" to this clause would better clarify the boundaries under which Category A procedures may be performed. For example:

*A doctor registered in the vocational scope of dermatology may **only** perform non-visceral, non-structural complex surgical cosmetic procedures. The doctor must also:*

- a. Have completed Council-approved surgical cosmetic procedures training and had a Council-approved extension to their scope of practice; or*
- b. Be participating in Council-approved surgical cosmetic procedures training and performs Category A cosmetic procedures only as part of that training*

We believe the policy would also benefit from providing clearer guidance on the distinction between structural and non-structural, and visceral and non-visceral, procedures. We agree with the Council that including a definitive list of procedures would be impractical; however, we believe that including definitions on non/structural and non/visceral procedures, along with examples of procedures which fall into each of these definitions, would provide greater clarity and improve the interpretation of the policy without being unnecessarily burdensome. ASAPS' submission included a similar proposal which we would support as a starting point for developing these principles.

Finally, Clause 9 provides the expectations for a doctor operating within an extended scope of practice, including a statement that the doctor must be participating in a CPD programme approved by the Council. We believe that this requirement would be strengthened by explicitly stating that this CPD programme must be relevant to the extended scope that the doctor is working in. We would also invite further information on how these CPD programmes related to the extended scope of practice will be accredited by the Council. RACS would be happy to be actively involved as part of that accreditation process.

We appreciate the Council's on-going engagement on this issue and look forward to seeing the final version of this policy.

Nāku noa, nā

Dr Sharon English FRACS
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