

06.03.24

Via email: AhpraConsultation@ahpra.gov.au

Re: Public consultation on draft guidelines for non-surgical cosmetic procedures

The Royal Australasian College of Surgeons supports the Australian Society of Plastic Surgeons (ASPS) submission concerning improving regulation of non-surgical cosmetic procedures, focusing on facilities, medicines, non-registered practitioners, and advertising. RACS agrees with ASPS that current regulations are insufficient and propose stricter guidelines, especially for non-medical practitioners. Key concerns include:

1. **Vague language:** Terms like "encouraged to provide procedures" lack enforceability.
2. **Inadequate mental health assessment:** ASPS suggests amending the term "assessment" for psychological conditions, considering the limitations of non-medical professionals.
3. **Unclear regulations for businesses:** Responsibility for advertising by entities like optician chains needs clarification.
4. **Non-compliance with existing regulations:** Stricter enforcement of existing rules on medication use and advertising is necessary.

Overall, ASPS emphasises the need for comprehensive regulations to protect public safety and build trust in the industry.



Furthermore, RACS would also like to include the following-

1. **Facilities and non-surgical cosmetic procedures:** Any licensing scheme for non-surgical cosmetic procedures must strike a balance between protecting the public and building confidence in the safety of the aesthetic industry, while respecting consumer choice and encouraging innovation. All procedures have some risks and can lead to serious complications if not correctly done. These risks are greater where the person carrying out the procedure is not sufficiently knowledgeable or trained, where they use unregulated products, or when the procedure is carried out at unsuitable facilities.
2. **The draft guidelines are questionable around this area:** Section 13.2 uses the phrase 'encouraged to provide procedures' when stating where health practitioners should be performing non-surgical cosmetic procedures. This is an unsatisfactory clause as it has no power to be enforced.

Sincerely,



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President**



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Chair, Health Policy & Advocacy Committee**

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