



ANZCA
FPM

9 December 2022

Dr Anne Tonkin
Chair, Medical Board of Australia

By email: medboardconsultation@ahpra.gov.au

Dear Dr Tonkin

Regulation of medical practitioners who provide cosmetic medical and surgical procedures

Thank you for the opportunity for the Australian and New Zealand College of Anaesthetists (ANZCA) to provide feedback on the regulation of medical practitioners who provide cosmetic medical and surgical procedures.

ANZCA, including the Faculty of Pain Medicine (FPM), is committed to setting the highest standards of clinical practice in the fields of anaesthesia, perioperative medicine, and pain medicine. As one of the largest medical colleges in Australia, ANZCA is responsible for the postgraduate training programs of anaesthetists and specialist pain medicine physicians, in addition to promoting best practice and ongoing continuous improvement that contributes to a high-quality health system.

We note that assessment of patient suitability addresses motivation and psychological concerns, however physical assessment, and identification of individual risk factors for patients undergoing sedation or anaesthesia should be incorporated to reflect holistic patient assessment. We also recommend that responsibility for assessing, discussing, and managing medical risks be addressed by cosmetic surgery practitioners as it is unlikely to be covered in the GP referral. A discussion of the risks of local anaesthesia, sedation, or general anaesthesia should also be included in consent as appropriate.

Our main feedback for the documents relating to cosmetic surgery is it should acknowledge inclusion of a reference to ANZCA's [PG09\(G\) Guideline on procedural sedation 2022](#) document for all sedation as it is relevant to cosmetic surgery. More considerations are required in the regulations given to the competencies and skills required to provide sedation or anaesthesia for patients undergoing major cosmetic procedures.

Thank you again for the opportunity to comment on the regulation of medical practitioners who provide cosmetic medical and surgical procedures. Should you require any further input, please do not hesitate to contact ANZCA's policy staff at policy@anzca.edu.au.

Yours sincerely

Associate Professor Joanna Sutherland
Chair, Safety and Quality Committee

Public consultation - Submission

Regulation of medical practitioners who provide cosmetic medical and surgical procedures

14 November 2022

The Medical Board of Australia (the Board) is consulting on three documents aimed at regulating aspects of cosmetic surgery. These documents have been developed following an independent review of the regulation of medical practitioners who perform cosmetic surgery that raised serious concerns about the cosmetic surgery sector.

You are invited to provide feedback on the following documents:

1. Draft *Registration standard: Endorsement of registration for cosmetic surgery for registered medical practitioners*
2. Draft revised *Guidelines for medical practitioners who perform cosmetic medical and surgical procedures*
3. Draft *Guidelines for medical practitioners who advertise cosmetic surgery*

This submission form is intended for **organisations and registered health practitioners**.

Patients and consumers are welcome to provide feedback here however, there is an online submission form with specific questions for consumers available on the Board's [current consultations page](#).

The consultation paper, including the three documents, is available on the [Board's website](#).

Submissions can be emailed to medboardconsultation@ahpra.gov.au.

The closing date for submissions is 11 December 2022.

Definition

Cosmetic medical and surgical procedures (as defined in the Medical Board's *Guidelines for registered medical practitioners who perform cosmetic medical and surgical procedures*) are operations and other procedures that revise or change the appearance, colour, texture, structure or position of normal bodily features with the dominant purpose of achieving what the patient perceives to be a more desirable appearance.

Major cosmetic medical and surgical procedures ('cosmetic surgery') is defined as procedures which involve cutting beneath the skin. Examples include; breast augmentation, abdominoplasty, rhinoplasty, blepharoplasty, surgical face lifts, cosmetic genital surgery, and liposuction and fat transfer.

Publication of submissions

Published submissions will include the names of the individuals and/or the organisations that made them, unless confidentiality is expressly requested.

Your details

Name: [REDACTED]

Organisation (if applicable): Australian and New Zealand College of Anaesthetists (ANZCA)

Are you making a submission as?

- An organisation

Do you work in the cosmetic surgery/procedures sector?

- Yes – I work in the area but do not provide surgery or procedures (e.g. practice manager, non-clinical employee)

For medical practitioners, what type of medical registration do you have?

- Specialist registration only – Specialty (optional): Anaesthesia

Do you give permission to publish your submission?

- Yes, with my name

Feedback on draft Registration standard

This section asks for feedback on the *Draft Registration standard: Endorsement of registration for cosmetic surgery for registered medical practitioners*.

The details of the requirements for endorsement are in the [draft registration standard](#).

1. Are the requirements for endorsement appropriate?

2. Are the requirements for endorsement clear?

3. Is anything missing?

Feedback on draft revised Cosmetic Guidelines

This section asks for feedback on the Board's proposed changes to its 2016 *Guidelines for medical practitioners who perform cosmetic medical and surgical procedures*.

The details of the revised guidance are in the [draft revised Cosmetic Guidelines](#).

4. Are the proposed changes to the Cosmetic Guidelines appropriate?

The Australian and New Zealand College of Anaesthetists (ANZCA) supports the proposed changes, in the interests of safety of patients and the public, especially:

- The requirement for practitioners to undertake AMC training.
- Mandated referral from a GP.
- The requirement for any "major" cosmetic surgery to be performed in an accredited facility (to comply with National Standards) regardless of jurisdictional regulations.

5. Does splitting the guidance into sections for major and for minor cosmetic procedures make the guidance clearer?

Classification of procedures into minor and major cosmetic procedure does add clarity to the guidance, however it leaves room for interpretation by practitioners to determine procedures as minor. ANZCA believes that further granularity in the classification may be required to allow for appropriate and targeted risk stratification of procedures. For example, liposuction is defined as a 'major' procedure without further description of the volume of lipoaspirate.

6. Are the draft Cosmetic Guidelines and the Board's expectations of medical practitioners clear?

7. Do you support the requirement for a GP referral for all patients seeking major cosmetic surgery?

Section 2, Assessment of Patient Suitability addresses motivation and psychological concerns, however physical assessment, and identification of individual risk factors for patients undergoing sedation or anaesthesia should be incorporated to reflect holistic patient assessment. Responsibility for assessing, discussing, and managing medical risks will still need to be addressed by cosmetic surgery practitioners as it may not be covered in the GP referral. Consent should also specifically include a discussion of the risks of local anaesthesia, sedation, or general anaesthesia as appropriate.

8. Do you support the requirement for major cosmetic surgery to be undertaken in an accredited facility?

9. Is anything missing?

More consideration is required in the regulations with regard to the competencies and skills required to provide sedation or anaesthesia for patients undergoing major cosmetic procedures. ANZCA recommend inclusion of a reference to ANZCA's [PG09\(G\) Guideline on procedural sedation 2022](#) document for all sedation as it is relevant to cosmetic surgery.

Feedback on draft Advertising Guidelines

This section asks for feedback on guidelines for advertising cosmetic surgery.

The Board's current *Guidelines for medical practitioners who perform cosmetic medical and surgical procedures* (2016) include a section on 'Advertising and marketing'.

The Board is proposing standalone *Guidelines for medical practitioners who advertise cosmetic surgery* because of the influential role of advertising in the cosmetic surgery sector.

The details of the advertising guidance are in the [draft Advertising Guidelines](#).

10. Is the guidance in the draft Advertising Guidelines appropriate?

11. Are the draft Advertising Guidelines and the Board's expectations of medical practitioners clear?

12. Is anything missing?

Additional comments

13. Do you have any other comments about cosmetic surgery regulation?