



PRESIDENT

**Dr Genevieve Goulding**  
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AUSTRALIAN AND NEW ZEALAND  
COLLEGE OF ANAESTHETISTS

ABN 82 055 042 852

*Advancing anaesthesia,  
improving patient care*

14 May 2015

Dr Joanna Flynn  
Chair  
Medical Board of Australia  
GPO Box 9958  
Melbourne VIC 3001

Email: [medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

Dear Dr Flynn

**Re: Public consultation – *Registered medical practitioners who provide cosmetic medical and surgical procedures***

Thank you for your invitation to make a submission in relation to the above public consultation.

The Australian and New Zealand College of Anaesthetists (ANZCA), including the Faculty of Pain Medicine, is committed to high standards of clinical practice in the fields of anaesthesia and pain medicine. As the education and training body responsible for the postgraduate training programs of anaesthesia and pain medicine for Australia, New Zealand and parts of Asia, we believe in ongoing continuous improvement and strive to ensure our programs represent best practice and contribute to a high quality health system.

The College's mission is to ensure that all Australian's have access to high quality and safe anaesthesia and perioperative care.

### **General Comments**

ANZCA has reviewed the consultation paper and commends the Board on developing a comprehensive document that is firmly focused on protecting consumer rights in relation to cosmetic and surgical procedures. This is an area of considerable concern to the College, highlighted by a recent case of major morbidity in a patient undergoing a cosmetic procedure under local anaesthesia and sedation in a stand-alone facility. To this end we have entered into discussions with the Australasian College of Cosmetic Surgery to address concerns shared by both Colleges.

As a medical College it would be inappropriate for ANZCA to speak on behalf of consumer groups. Therefore we have not addressed the specific questions in the paper. However we would like to make the follow comments:

### *Assessment*

The consultation document is focussed on psychological assessment but physical assessment is equally as important. As identified, the procedures are entirely elective and usually initiated and requested by the

consumer without referral from a GP who would have knowledge of the patient's general health. It cannot be assumed that all patients presenting for cosmetic procedures are young and "fit".

ANZCA recommends that the issue of physical assessment prior to the provision of a surgical or medical procedure is explicitly addressed in the document.

#### *Risk of anaesthesia*

In addition to surgical risks and complications, informed consent must also include provision of information regarding the risks of local anaesthesia, sedation and general anaesthesia when administered. No procedure is risk free and even provision of local anaesthesia alone can have potentially life-threatening complications in healthy individuals.

#### *Regulation of facilities*

Cosmetic procedures are generally performed outside the public health system. Regardless of the regulation and licensing of the facility, patient safety is paramount. The ANZCA Professional Standard pertaining to provision of sedation or analgesia for surgical procedures (PS09 Guidelines on Sedation and/or Analgesia for Diagnostic and Interventional Medical, Dental or Surgical Procedures) is referenced by the Medical Board of Australia and should apply in all facilities. This has implications for appropriate training and numbers of healthcare personnel. Appropriate monitoring and resuscitation equipment needs to be available where any form of sedation is administered.

If anaesthesia is to be provided, ANZCA Professional Standard *PS55 Recommendations on Minimum Facilities for Safe Administration of Anaesthesia in Operating Suites and Other Anaesthetising Locations*, should be used to inform practice.

#### **Preferred Option**

ANZCA believes the option which best addresses the problem of consumers making rushed decisions to have cosmetic procedures without adequate information is **Option three** – Strengthen current guidance for medical practitioners providing cosmetic medical and surgical procedures through new, practice-specific guidelines that clearly articulate the Board's expectations of medical practitioners

Thank you for the opportunity to provide feedback. Should you require any further information, please contact Jonathon Kruger, General Manager, Policy, via email [jkruger@anzca.edu.au](mailto:jkruger@anzca.edu.au) or telephone +61 3 8517 5341.

Kind Regards



Genevieve Goulding  
President



Phillipa Hore  
Chair – ANZCA Safety and Quality Committee