



Patron: H.R.H. The Prince of Wales

# ROYAL AUSTRALASIAN COLLEGE OF SURGEONS

ABN 29 004 167 766

College of Surgeons' Gardens, 250 – 290 Spring Street,  
East Melbourne VIC 3002  
Telephone +61 3 9276 7404 Facsimile +61 3 9249 1208  
E-Mail: [college.president@surgeons.org](mailto:college.president@surgeons.org)

## OFFICE OF THE PRESIDENT

Professor David Watters

22 June 2015

Dr Joanna Flynn AM  
Chair, Medical Board of Australia  
G.P.O. Box 9958  
Melbourne VIC 3001

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

Dear Dr Flynn

### **Re: Medical Board of Australia 'Consultation – Registered medical practitioners who provide cosmetic medical and surgical procedures'**

Thank you for providing the Royal Australasian College of Surgeons with an opportunity to review the above Public Consultation Paper and Regulatory Impact Statement.

The College strongly supports continued efforts to provide more comprehensive principles and guidelines in the area of cosmetic medical and surgical procedures. We have reviewed the options detailed within the Consultation Paper and Regulatory Impact Statement and endorse Option 3 as the most appropriate.

In particular we are in agreement that:

- Current guidance should be strengthened through new practice specific guidelines that clearly articulate the Board's expectations of medical practitioners.
- A consistent mandatory 'cooling off period' be instituted.
- The Medical Board address the inconsistency in state-based legislation (or absence thereof) with the provision of a nationally consistent standard to be applied for cosmetic procedures on patients under 18 years of age.
- The title 'Surgeon' should only be used by a medical practitioner with an AMC recognised qualification in surgery.

The above consultation has also been reviewed by the Australian Society of Plastic Surgeons. We would like to affirm the additional comments made in their submission.

We look forward to contributing further to future consultations on this topic.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Watters'.

Professor David Watters OBE  
**President**