



Health and Disability Commissioner
Te Toihau Hauora, Hauātanga

8 October 2007

Michael Thorn
Policy Analyst and Researcher
Medical Council of New Zealand
PO Box 11649
WELLINGTON

By e-mail: mthorn@mcnz.org.nz

Dear Michael

Draft statement on cosmetic procedures

Further to my letter of 19 July 2007, I note that the Medical Council is due to meet this week to discuss the final draft of the statement on cosmetic procedures.

Dr Daniel Fleming from the Australasian College of Cosmetic Surgeons (ACCS) has contacted HDC because he is concerned that category 1 procedures are being restricted to surgeons with FRACS qualifications and doctors who have completed their advanced surgical training through ACCS will not be able to perform these procedures.

We have advised Dr Fleming that it is the Council's role to set scopes of practice and competency standards and that HDC has only been involved in this process by making submissions. However, Dr Fleming has brought these issues to our attention because he believes a monopoly over cosmetic procedures will not encourage quality improvements in cosmetic procedures, contrary to the public interest.

My understanding of category 1 is that it is restricted to doctors who:

- have a relevant surgical scope of practice;
- have taken individual responsibility to obtain the necessary training, expertise and experience in the relevant procedure; and
- have had their competence to perform the procedure independently assessed, as part of a fellowship or the equivalent.

I understand from Dr Fleming that doctors who are certified by ACCS have undergone three years of basic surgical training, followed by two years in an advanced surgical training programme in cosmetic procedures. You will recall that I commented on the need for these types of cosmetic subspecialty training programmes in my 22 March 2007 submission.

It would appear, however, that ACCS has not yet been approved as an Australasian postgraduate qualification that would allow doctors to apply for a vocational scope of practice in New Zealand. Dr Fleming is therefore concerned that doctors with this qualification will not be able to show that they have a “surgical scope of practice” for the purposes of undertaking category 1 procedures.

You have confirmed that the Council is still considering these issues but that doctors in this category will still be entitled to perform category 1 procedures in New Zealand provided they are in a collegial relationship and that the Royal Australasian College of Surgeons will be responsible for providing nominees for this purpose.

I agree that these are issues that warrant further consideration to find a suitable arrangement until there is a recognized scope of practice for cosmetic surgery in New Zealand.

Yours sincerely



Ron Paterson
Health and Disability Commissioner