



ANZCA
FPM

*Te Whare Tohu o
Te Hau Whakaora*

24 September 2025

Te Kaunihera Rata o Aotearoa

Medical Council of New Zealand

By email: policy@mcnz.org.nz

Tēnā koe

Consultation - Regulating doctors performing cosmetic procedures.

Te Whare Tohu o Te Hau Whakaora | The Australian and New Zealand College of Anaesthetists (ANZCA), which includes the Faculty of Pain Medicine (FPM) thanks you for the opportunity to provide feedback on proposed changes to regulating doctors performing cosmetic procedures. The college has consulted with our national committees (National Committee NZ and FPM NZ) and education and policy advisors in Australia and Aotearoa.

ANZCA understands the rationale for, and supports, separating the information in the current Statement on Cosmetic Procedures into the revised draft Statement on doctors performing cosmetic procedures (the Statement) and draft Policy on the training and expertise necessary for doctors to safely perform cosmetic procedures (the Policy). The College is satisfied that the proposal keeps this area of practice (where mortality and morbidity have been related to poor practitioner skill and lack of broader understanding of post-surgical complications) narrowly defined. ANZCA supports the proposal, with the brief additions relating to anaesthesia/sedation as recommended below. We also note public health concerns, particularly with risks of infection, in the appearance industry and, as yet, unsuccessful attempts to regulate 'grey' areas. We make two suggestions in relation to these.

Recommendation 1

Although comprising only a small area of practice for ANZCA fellows, cosmetic surgical procedures occasionally require general anaesthesia but commonly employ sedation and/or analgesia. ANZCA therefore strongly **recommends** strengthening the proposal in relation to anaesthesia in both documents.

Regulations should be clear about the competencies and skills required to provide safe sedation or anaesthesia for patients undergoing cosmetic procedures as highlighted by the Medical Practitioners Disciplinary Tribunal's prosecution of Dr Ian Scott Little for the fatal outcome of his failure to provide safe anaesthesia for a chemical peel¹. ANZCA's PG09 (G) Guideline on procedural sedation 2023² which covers standards of care for health professionals providing sedation, should be specifically referenced in the Policy document.

We suggest that clause 5 under **Cosmetic procedures**, could be modified to include a separate subclause (5 b) specific to the risks of anaesthesia.

In the Statement, under **Informed consent**, we suggest adding "including from anaesthesia, sedation and analgesia" to 9.d. Risks and possible complications.

¹ Little v MPDT (2002) 211/02/92C.

² Australian and New Zealand College of Anaesthetists. PG09 Guideline on Procedural Sedation [Internet]. 2023. Available from: [Review P9 \(1996\)](#)

Recommendation 2

Local anaesthetic systemic toxicity (LAST) is a potential risk when administering large volumes of local anaesthetic, especially when injected in close proximity to vascular structures. While rare, the fact that LAST episodes can occur despite proper technique, makes it essential that the practitioner understands maximal doses of the different local anaesthetic agents and is able to recognise the early signs and symptoms of LAST. ANZCA **recommends** that the Policy includes a statement to this effect.

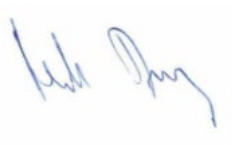
Further comment

Due to concerns with rates of infection, we suggest the Policy should specify sound infection control procedures.

Although Botox is a medication, and not strictly part of this consultation, we draw your attention to an issue raised by the FPM chairs. In the past, and particularly in Australia, Botox has been used by some pain specialists to treat migraines, with varying degrees of compliance with treatment protocols. FPM's recommendation is that use of Botox for therapeutic purposes, for example for migraines, should be specifically excluded from cosmetic procedures.

We trust the above is useful and thank you again for the opportunity to provide feedback on the proposed regulatory changes.

Nāku noa, nā



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