

Dr Anne Tonkin
Chair, Medical Board of Australia
Ahpra
GPO BOX 9958
Melbourne VIC 3001
Via email: medboardconsultation@ahpra.gov.au

Dear Dr Tonkin,

Re: ASO Response – public consultation regulation of medical practitioners who provide cosmetic medical and surgical procedures.

Thank you for the opportunity to respond to the Medical Board of Australia’s public consultation on the ‘Regulation of medical practitioners who provide cosmetic medical and surgical procedures.’

The Australian Society of Ophthalmologists Ltd (ASO) is Australia’s peak medico-political body representing ophthalmologists and their patients. A key function of the ASO is to promote access to high quality eye care for all Australians. Membership of the ASO is made up of ophthalmologists, trainee ophthalmologists and ophthalmic staff in all states and territories across Australia.

The ASO supports the principle of formal endorsement for medical practitioners performing cosmetic surgery in the interests of patient safety. However, the ASO is concerned by the limited detail of how this endorsement model will function with existing AMC accredited surgical colleges.

The ASO also requests more information on proposed regulation to protect patients undergoing cosmetic procedures from non-medical practitioners.

Ophthalmologists are specialist eye surgeons and should be identified as such under the list of Medical Board approved specialty types, therefore entitling them the use of the title specialist ophthalmologist and eye surgeon, or oculoplastic surgeon. ASO addressed our concerns relating to the use of titles in the **Consultation Regulation Impact Statement** (Impact Statement) *Medical practitioners’ use of the title surgeon under the National Law*. The ASO awaits the Health Minister’s response to this review.

Ophthalmologist oculoplastic surgeons perform functional eye surgery including reconstructions, lesion removal and eye removal. They also perform cosmetic eye procedures and surgery more commonly blepharoplasty and ptosis.

Ophthalmologist oculoplastic surgeons are fellows of the Royal Australian College of Ophthalmologists (RANZCO) and have undertaken additional internationally recognised 1 or 2 year fellowships, often in the UK or US. They obtain specialised training and accreditation in peri-ocular plastic surgery (eyelid, orbit, tear duct system and facial cosmetic and reconstructive surgery).

Ophthalmologist oculoplastic surgeons are also members of the Australian and New Zealand Society of Ophthalmic Plastic Surgeons (ANZSOPS). Membership of this group requires completion of approved formal subspecialty fellowship training as well as contributions to peer reviewed publications.

Ophthalmologist oculoplastic surgeons may also be members of the Australasian Academy of Facial Plastic Surgery (AAFPS) which also has similar requirements.

The Royal Australian College of Ophthalmologists (RANZCO) should therefore be the only training body responsible for accrediting Ophthalmologists performing ophthalmic cosmetic surgery.

To ensure maximum patient safety and world class surgical standards, it should be mandatory for all providers that are endorsed for the training of cosmetic procedures and surgery to achieve AMC accreditation.

If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Peter Sumich', written in a cursive style.

Dr Peter Sumich

President

11 / 12/ 2022