



16 May 2023

Emeritus Professor Anne Tonkin  
Medical Board of Australia Secretariat  
Australian Health Practitioner Regulation Agency  
GPO Box 9958  
Melbourne VIC 3001  
Via email: [medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

Dear Professor Tonkin,

**Re: Implementation of *Guidelines for registered medical practitioners who perform cosmetic medical and surgical procedures***

I am writing to raise concerns about the referral requirement in the *Advance Copy of the Guidelines for registered medical practitioners who perform cosmetic surgery and procedures*, effective from 1 July 2023. Section 2.1 states:

*All patients seeking cosmetic surgery must have a referral, preferably from their usual general practitioner or if that is not possible, from another general practitioner or other specialist medical practitioner. The referring medical practitioner must work independently of the medical practitioner who will perform the surgery and must not perform cosmetic surgery or non-surgical cosmetic procedures themselves.*

There are many instances where it would be important and valuable for patients to consult with their GP. However, we do not support a blanket mandate.

GPs do not usually 'refer' people for a cosmetic procedure, they refer people on for an opinion/management regarding a particular health concern. A referral could be interpreted by the patient as an endorsement of the procedure, or of the clinician, which of course it is not. Examples when a consultation will be valuable include:

- To ensure relevant patient information has been updated, in order to convey important medical information to the referred clinician. Especially important for people with existing medical conditions.
- To counsel patients, particularly for patients under 18 years of age. We recommend some procedures, such as female genital cosmetic surgery, should be delayed until after 18 years of age with an appropriate cooling off period. The RACGP has produced a resource for GPs, [Female genital cosmetic surgery: a resource for general practitioners and other health](#)



[professionals](#), and recommends that people under 18 asking about female genital cosmetic surgery should be referred to a specialist adolescent gynaecologist

- To assess the patient for underlying psychological conditions (such as body dysmorphic disorder) as it may render them unsuitable for the procedure.
- Where suspected, to ask the patient about family violence or intimate partner violence, and if the patient is being coerced into the procedure. GPs are often the first point of contact for patients experiencing family or intimate partner violence.

As such, ahead of this upcoming change, the RACGP seeks clarity from the Medical Board on its reasons for mandating this requirement, and would appreciate a discussion on whether there is opportunity for this recommendation to be amended. We are aware of the [FAQs document for GP](#) referral. We would also like to understand what further plans are in place to support GPs in this role and ensure patients have an understanding of these requirements and the meaning of a referral in this situation. For any enquiries regarding this letter, or to arrange a meeting please contact Stephan Groombridge, National Manager, Practice management, Standards and Quality Care on 03 8699 0544 or [stephan.groombridge@racgp.org.au](mailto:stephan.groombridge@racgp.org.au).

I look forward to hearing from you.

Yours sincerely

Dr Nicole Higgins  
President