



**National Council of  
Women of New Zealand**

Te Kaunihera  
Wahine O Aotearoa

National Office  
Level 4 Central House  
26 Brandon Street  
PO Box 25-498  
Wellington 6146  
(04) 473 7623  
www.ncwnz.org.nz

4 April 2007

S07.19

**Submission to the Medical Council of New Zealand on the Draft Statement  
on Cosmetic Procedures**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 42 nationally organised societies. NCWNZ has 31 branches throughout the country to which women from 150 societies are affiliated. NCWNZ also represents a number of individual women. The Council's function is to serve women, the family and the community at local, national and international levels through research, study, discussion and action.

The main provisions of the Draft Statement on Cosmetic procedures were circulated to the membership for discussion. Given the substance of the Draft Statement and the interests of NCWNZ it is greatly regretted that more time was not allowed for consultation. This response is based on the responses of fifty five women from five branches.

NCWNZ fully supports the general thrust of the Draft Statement, especially regarding the need for adequate training, supervision, auditing retraining and up-dating of health practitioners involved in cosmetic procedures. NCWNZ members commended the sections on advertising and promotion (8-10), obtaining consent (11-6), providing care (17-19) and audit review (20).

**NCWNZ makes specific comments on the following sections of the Draft Statement:**

**The Purpose of the Statement:**

*Footnote 1* restricts the provisions of the Draft Statement to doctors only. The Medical Council should be concerned with anyone administering health care relating to cosmetic procedures. Therefore the classes of health practitioners who are not doctors and who have professional associations should be named in the Draft Statement for the better information of patients and clients, and this important warning should not be provided in small print in a footnote where it may be missed by readers.

**Expectation of Training, Skill and Expertise:**

7) There is a contradiction in this section when read with 7, category 3. In 6, treatment is to be provided only by doctors but in 7, category 3, others such as nurses may provide treatment. These sections need clarification.

**The Categorisation System:**

*Category 3* was a matter of concern to NCWNZ members who cited examples of mole removals and varicose vein treatments having gone wrong, including the much publicised Christchurch face peel which lead to the death of a patient.

This section needs much more definition and explanation, perhaps with fewer procedures being placed in category 3.





Listing and categorising the types of procedure is valuable but in its current format, the division between Categories B and C constitutes a grey area because the doctor or another health worker must make a judgement about the severity of the problem and possible consequences of treatment. The demarcation between Category 2 and 3 should be much clearer to doctors and patients. If this is not practical there should be just two categories.

There should always be adequate after-care, facilities and trained personnel ready should a procedure go wrong for a particular patient. Category C appears not to be adequately covered for misadventure.

NCWNZ notes with approval the proposal to review the Draft Statement in 2012 and hopes that full records of all complaints and misadventures will be kept and the date for review brought forward if it is deemed necessary because of complaints.

Thank you for setting up standards for cosmetic procedures and for providing this opportunity for NCWNZ to comment on the Draft Statement on Cosmetic Procedures.

Christine Low  
**President**

Frances Townsend  
**Convener Education Standing Committee**