



ANZCA
FPM

4 April 2022

NRAS Review Implementation Project Team
Victorian Department of Health
50 Lonsdale Street
Melbourne VIC 3000

By email: NRAS.Consultation@health.vic.gov.au

Dear NRAS Review Implementation Project Team

Use of the title 'surgeon' by medical practitioners in the Health Practitioner Regulation National Law

Thank you for the opportunity for the Australian and New Zealand College of Anaesthetists (ANZCA) to provide feedback on the Health Council's Consultation Regulation Impact Statement: Use of the title 'surgeon' by medical practitioners.

ANZCA, including the Faculty of Pain Medicine (FPM), is committed to setting the highest standards of clinical practice in the fields of anaesthesia, perioperative medicine and pain medicine. As one of the largest medical colleges in Australia, ANZCA is responsible for the postgraduate training programs of anaesthetists and specialist pain medicine physicians, in addition to promoting best practice and ongoing continuous improvement that contributes to a high quality health system.

Our college holds the view that in the context of medicine, the title "surgeon" should only be used by those who have undertaken specialist training in surgery. A patient attending a practitioner who calls themselves a surgeon has the right to assume that the practitioner has met specified training requirements.

Similarly, the term "cosmetic surgeon" should be able to be used only by those medical practitioners who have undertaken a well-defined, recognised, and ideally AMC-accredited cosmetic surgical training program, and who also undertake continuing professional development within that specialty. An appropriate authority would need to assess the curriculum/training.

Sedation and/or analgesia are commonly employed for surgical procedures by a range of health practitioners with diverse qualifications and training, including anaesthetists and other medical practitioners. Our professional documents seek to support uniform standards for high quality and safe administration of local anaesthesia, major regional anaesthesia, analgesia administered without sedation, general anaesthesia techniques, and procedural sedation and/or analgesia by all appropriately qualified health practitioners in Australia and New Zealand.

In addition to practitioners carrying out cosmetic surgical procedures having undertaken appropriate training, practitioners providing anaesthesia, sedation or analgesia as part of a cosmetic surgical procedures must be appropriately qualified and trained.

Surgery and anaesthesia for patients in Australia and New Zealand is increasingly safe. There is an increasing proportion of cases in which patients' pre-existing medical conditions may have contributed to harm. Similarly, older patients and those with worse physical status are more likely to suffer complications.

ANZCA is currently leading the development of a collaborative, integrated and effective model of perioperative medicine. An emphasis on perioperative medicine enables practitioners to work collaboratively to optimise perioperative management of patients at high risk, including for patients seeking cosmetic surgical procedures.

For all surgery, including cosmetic surgery, the impact of comorbidities and chronic conditions on surgical outcomes highlights the important role multidisciplinary teams can play in preoperative shared decision making and co-ordination of perioperative care from initial surgical assessment and preoperative optimisation through to postoperative follow up, including ongoing specialist and primary care.

With regard to the four main options in response to the issues identified in the Regulation Impact Statement, ANZCA supports restricting the title 'surgeon' under the National Law, and for feedback to be sought on which practitioners should be eligible to use the title. Such clarity would benefit patient understanding of the training and competency of the practitioner offering to provide a cosmetic surgery procedure.

Thank you again for the opportunity to comment on the Consultation Regulation Impact Statement. Should you require any further information, please do not hesitate to contact ANZCA policy staff in the first instance at policy@anzca.edu.au.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'David Story'.

Professor David Story
Chair, Safety and Quality Committee