

# Medicines in beauty treatment/cosmetic businesses

Medicines and Poisons Act 2019 – December 2024

## Cosmetic injectables

Medicines commonly associated with beauty treatment/cosmetic businesses include the cosmetic injectables **botulinum toxin** (sold under the brand names Botox® and Dysport®) and **dermal fillers** such as collagen, hyaluronic acid and polylactic acid.

These substances are classified as Schedule 4 (**S4**) “prescription only” medicines and are regulated in Queensland under the *Medicines and Poisons Act 2019* (**MPA**) and the Medicines and Poisons (Medicines) Regulation 2021 (**MPMR**).

Where S4 cosmetic injectables are intended to be used in beauty treatment/cosmetic businesses, this must be done in accordance with the medicines regulatory scheme set out in the MPA and MPMR.

This factsheet provides guidance on the buying, storage and use of these S4 cosmetic injectables. For information on other medicines or in other settings, see the Queensland Health webpage: [Medicines and Poisons Act fact sheets and supporting documents](#).

## Authorisations for prescribing and administering S4 cosmetic injectables

In a beauty treatment/cosmetic business setting, the only persons who can prescribe S4 cosmetic injectables are medical practitioners or nurse practitioners (authorised prescribers).

Note that in Queensland, the term ‘prescribe’ includes writing a prescription for a specific patient to be dispensed by a pharmacist; making a written prescription on a patient medication chart for a registered nurse to administer; or giving an oral prescription to a registered nurse to administer a medicine to a patient the prescriber has assessed.

Before writing or giving an oral prescription for a patient of a beauty treatment/cosmetic business, an authorised prescriber must assess the intended medicine to be **reasonably necessary for the therapeutic treatment** of the patient. This means they must assess **each individual patient** to determine the therapeutic medicine requirements for that patient.

If a prescription for dispensing is written for the patient, then the patient will need to take the prescription to a pharmacist to be dispensed. The cosmetic injectable can then be used in accordance with the instructions on the dispensing label, for example, it can be taken back to the clinic and administered by a registered nurse according to the instructions on the dispensing label.

If the prescription is for administration of the cosmetic injectable to the patient, then the authorised prescriber must ensure that such administration will be by a person authorised to administer the scheduled medicine, for example a registered nurse or enrolled nurse (noting enrolled nurses can only administer a medicine under the supervision of a medical practitioner or registered nurse). Administration by the authorised person must be in accordance with the instructions on the prescription.

For any S4 prescriptions, either for dispensing or for administration, the prescription must contain the details required under the MPMR for a lawful prescription. For more information please refer to the [Writing lawful prescriptions](#) factsheet.

## Standing Orders

Standing orders **cannot** be used for the administration of cosmetic injectables to patients by registered nurses in a beauty treatment/cosmetic business.

Under the MPMR, the use of a standing order is limited to certain circumstances, including at an institution such as an aged care facility, hospital, prison or detention centre. Refer to the [Standing orders](#) factsheet for further information.

## Buying S4 cosmetic injectables

Only a medical practitioner or a nurse practitioner may buy S4 medicines, including cosmetic injectables in a beauty treatment/cosmetic business, and only in accordance with the MPMR.

**It is unlawful for registered nurses, enrolled nurses, admin staff or other unauthorised persons to buy cosmetic injectables for a beauty treatment/cosmetic business, even 'on behalf of' or 'with the approval of' a doctor or nurse practitioner.**

This means such persons **cannot** place a purchase order with a medicine wholesaler or pharmacist for the supply of the S4 medicines, including sending an electronic order under the medical practitioner or nurse practitioner's name or account. Furthermore, doctors and nurse practitioners that do not work for the beauty treatment/cosmetic business also cannot purchase medicines on behalf of the business. This **MUST** be done by the medical practitioner or nurse practitioner working for the business.

The medical practitioner or the nurse practitioner must complete the purchase order themselves and must sign the purchase order if it is a paper purchase order. If the medical

practitioner or nurse practitioner sends a purchase order to a supplier using an electronic system, then they can use a unique identifier in the purchase order. For example, where the buyer has a unique username or account number set up with the supplier, this can be shown on the purchase order when the buyer uses a secure ordering website.

Importantly, no other person can use this unique username or account number to buy on that secure ordering system on behalf of the buyer. For example, a registered nurse does not have an authorisation to buy S4 medicines and cannot do so on behalf of the authorised buyer.

Where the stock of medicine is to be delivered, the purchase order must state—

- (i) the street address of the buyer; or
- (ii) an authorised place at which the buyer is authorised to possess the stock.

This means stock can only be delivered to a place where the authorised buyer, such as a medical practitioner or a nurse practitioner, is physically practising from.

Doctors and nurse practitioners **cannot** buy stock for a place that they do not practice from, which includes locations for which telehealth is provided.

## Supplying S4 cosmetic injectables

A supplier, such as a licensed medicine wholesaler or a pharmacist, can only supply S4 cosmetic injectables to a person who is authorised under the MPMR to buy the medicines. Under the MPMR, the person will require the authority to 'give a purchase order', meaning they are specifically authorised to make a purchase order to be sent to a supplier. This must be compliant with the legislative requirements for purchase orders outlined in sections 48 to 53 of the MPMR.

The supplier has requirements that must be met before they can supply on a purchase order as outlined in sections 54 to 62 of the MPMR. For supply of S4 cosmetic injectables, these include that the supplier must:

- Have a reasonable belief that the buyer—
  - (i) is authorised under the legislation to give a purchase order or otherwise buy the stock; or
  - (ii) is permitted under a corresponding law or another law to obtain the stock; and
- obtain a compliant purchase order for the stock from the buyer.

## Storage of S4 medicines including cosmetic injectables

Under the MPMR, where medicines are stored in a *shared clinic*, being a place where more than one person will be possessing the stored medicines, the person in charge of the clinic must appoint a *medicines store establisher*. If a different person possesses the same stock of medicines at the place on another day or time, then this is considered to be a shared clinic.

For a shared clinic, the person in charge means the person with overall accountability for the place, and they must appoint **in writing** an appropriately qualified person to be the medicine store establisher. An appropriately qualified person would be a person who is authorised to possess and administer the medicines such as a medical practitioner, nurse practitioner or registered nurse. The medicine store establisher's responsibilities are to establish and maintain a medicine store for storing S4 medicines (and S2 or S3 medicines) at the place. The person in charge of the clinic must also appoint, **in writing**, a medicine store manager.

If the place only has a sole practitioner, then that practitioner is the medicines store establisher. A sole practitioner works at a place where they are the only person who will possess the medicines for independently practising a profession or performing a function at the place.

The medicine store establisher must take **all reasonable steps** to ensure the medicine store is established and maintained in a way that keeps the medicines in the store in accordance with the manufacturer's conditions for the medicines.

Each medicine store for a place must be in an area where the medicine store establisher reasonably believes a member of the public could not access the medicine store without being seen by a worker at the place. The medicines must only be taken from the medicine store when intended to be administered to a patient.

## Advertising of S4 cosmetic injectables

Advertising of S4 cosmetic injectables is **not permitted**. The Therapeutic Goods Administration (TGA) has strict controls on advertising.

Further information is available on the TGA page [Referring to cosmetic injectables in advertising](#).

## Buying and administering S2 and S3 medicines

At any premises where there **is not** an approved person administering medicines, namely a medical practitioner, nurse practitioner or registered nurse, no other persons can buy stock or administer S2 or S3 medicines, such as numbing creams that contain lidocaine. These are identified by a signal heading on the medicine's container that states 'Pharmacy Medicine', which means it is an S2 medicine or 'Pharmacist Only Medicine', which means it is an S3 medicine.

## Infection control requirements

Persons who operate a beauty treatment/cosmetic business have obligations under the *Public Health (Infection Control for Personal Appearance Services) Act 2003* to minimise the risk of infection. Refer to [Personal appearance services | Queensland Health](#) for further information.

Where cosmetic injectables are provided as a service from a health-care facility, operators are required to comply with Chapter 4 of the *Public Health Act 2005*, including having an infection control management plan. Refer to [Infection control management plans | Queensland Health](#) for further information.

## Further information

Contact the Medicines Approvals and Regulation Unit (MARU): [MARU@health.qld.gov.au](mailto:MARU@health.qld.gov.au)