

Health practitioner regulator gets tough on cosmetic injectable industry to protect patient safety

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Business and Industry Regulation

Tue 3 Jun 2025 at 6:29am



Nurses and dentists have been operating in the cosmetic injectable industry for years without being required to undertake any formal additional education or training. (*Unsplash: Sam Moghadam*)

In short:

AHPRA is tightening guidelines for dentists and nurses performing cosmetic injectables.

Further education and training for health practitioners will be required, as well as changes to advertising.

What's next?

From September, nurses will be required to complete a set period of 12 months' full-time practice before expanding their scope to include non-surgical cosmetic procedures.

The Australian health practitioner regulator has introduced sweeping new guidelines for dentists and nurses performing non-surgical cosmetic injectable procedures, in a bid to better protect the public from players putting profits ahead of patient safety.

The new rules released by the Australian Health Practitioner Regulation Agency (AHPRA) today mandate further education and training before healthcare practitioners can perform cosmetic procedures like botox and filler injections.

They also introduce minimum periods of experience required for nurses wanting to work with injectables.

Nurses and dentists have been operating in the billion dollar cosmetic injectable industry for years without being required to undertake any formal additional education or training, before injecting patients with neurotoxins like botox.

While many have become highly skilled at the practice, there's concern clearer rules are needed for those wanting to enter the industry to ensure they have enough training.



AHPRA CEO Justin Untersteiner said not all cosmetic injectors would be happy with the tighter rules. (*Unsplash: Sam Moghadam*)

Under the changes, advertisements will be required to include the details of the registered practitioner performing the procedures. Testimonials from social media influencers will be banned, along with targeted advertising of cosmetic procedures to minors.

AHPRA CEO Justin Untersteiner said not all cosmetic injectors would be happy with the tighter rules and expected some would choose to leave the industry under the changes.

"There will be others who have to modify their business models, and modify their practices to meet these guidelines," he said.

"This is a growing industry and I've got to say, what we do see in some cases is that there are people out there putting profit before patient safety."

Nurses and dentists have until September to prepare for the changes and ensure they are compliant with the new guidelines, which align with those already in place for doctors.

"[After that] we will be identifying those that are doing the wrong thing and we will take action where we need to," he said.

There's been a recent spate of cases of non-registered practitioners and clinics using off-brand or out-of-date dermal fillers and botox on patients leading to multiple hospitalisations after patients became ill with botulism.

The NSW Health Care Complaints Commission (HCCC) [warned patients of a Sydney cosmetic clinic to be tested for blood borne viruses](#) after finding evidence that non-registered staff were injecting patients with dermal fillers and botox.

Enforcement action around the country

The new federal guidelines are the latest salvo from state and federal regulators, who have been cracking down on cosmetic injectable providers, throwing some clinics into chaos as they scramble to ensure they comply with regulations.

Many injectable businesses around the country are run by nurses who do the injecting, and often hold supplies of prescription fillers and anti-wrinkle injections like botox on site, and arrange telehealth consults for their patients so doctors can remotely prescribe the products.

Recent guidance released in Queensland has made it clear the practice isn't legal unless the nurse is a Nurse Practitioner with prescribing rights and additional qualifications, or there's a doctor on site.



Many businesses hold injections like botox on site, and doctors prescribe the products remotely. (Pexels: Jonathan Borba)

State pharmaceutical and poisons regulators in both NSW and Queensland have also been conducting compliance checks on clinics, monitoring the possession and storage of schedule 4 medications like botox and fillers.

AHPRA said it was concerned some telehealth practitioners weren't meeting their professional obligations, after media reports revealed patients were sometimes being issued botox scripts in less than a minute.

The new guidance from AHPRA reinforced practitioners were responsible for understanding relevant state and federal drugs and poisons laws, and that those who prescribed cosmetic injectables were still responsible for the patients, regardless of whether or not they performed the procedure.

The guidelines also mandate written information must be given to the patient, including the health practitioner who prescribed the cosmetic injectable, the practitioner who performed the procedure, details of the

products used, what aftercare was needed, and who is responsible for coordinating the patient's care.

Injections that can 'create real harm'

From September, nurses will be required to complete a set period of 12 months of full-time practice before expanding their scope to include non-surgical cosmetic procedures.

The guidelines state further education will be necessary for those practitioners wanting to work with cosmetic injectables.

Those practitioners will need training in anatomy and physiology, education in assessing patients for suitability for the procedure, and both theoretical and hands-on training in the specific procedure being offered.



Mr Untersteiner says the new rules are "really making it crystal clear" about what the industry expects for cosmetic injectable procedures. *(Supplied: AHPRA)*

While AHPRA CEO Justin Untersteiner said there had always been an obligation for practitioners to ensure they had appropriate skills, the new rules were "really making it crystal clear" about what it expected for those sorts of procedures.

"That will likely require specific training around facial anatomy or physiology and I can tell you that is not a weekend course, this is proper training that will be required," Mr Untersteiner said.

He said the regulator had heard multiple cases of permanent irreversible facial nerve damage as well as potentially life-threatening strokes from cosmetic injectables.

"What we're talking about here is not just going in and having a facial...we're talking about some kind of injection that goes underneath the skin and can create real harm," he said.

"All registered health practitioners are responsible for ensuring they are sufficiently educated, trained and competent to safely undertake any cosmetic procedure they may perform."

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Nursing and Midwifery Board of Australia chair, Veronica Casey, welcomed the new guidelines and said the safety of the Australian public was paramount.

"These types of procedures are undertaken every day and can have serious consequences if not done correctly," she said.

"No practitioner should put their bottom line ahead of patient welfare, and these guidelines place the focus

squarely on the safety of those in their care."

The new AHPRA regulations outline that "registered health practitioners must also disclose any financial interests that could be perceived as influencing the advice they provide to people about cosmetic procedures".

Some doctors and nurses working in cosmetic injectable clinics operate on commission-based models, meaning the more work done or greater the volume of product injected, the more money they stand to make from a consultation.

But whether commission-based models need to be disclosed to patients will be subject to clinician's judgement and assessed by the regulator on a "case-by-case basis".

Ban on dancing, music in advertising

It is illegal to advertise almost all prescription medications or related services including cosmetic injectables, with the Therapeutic Goods Administration (TGA) responsible for regulation.

Despite this, cosmetic clinics have been widely flouting advertising rules for years on social media and their own websites.

The TGA said it had recently sent around 100 "targeted guidance letters" to providers in the cosmetic injectables industry, following identification of alleged non-compliance and that more will follow "in the coming weeks".

The agency said in a statement that last financial year it submitted over 12,000 requests for removal to social media platforms over the alleged unlawful advertising of therapeutic goods, including "over 2,500 advertisements relating to cosmetic injectable products".

The AHPRA guidelines now state any imagery used in advertising of higher-risk cosmetic procedures must be focused on information or education, citing concerns advertising was promoting the "trivialization and

glamourisation" of cosmetic procedures to vulnerable patients, especially on social media.

Examples of features more likely to be considered entertainment included imagery like music, dancing, singing, or comedic comments.

It comes almost four years after a joint [ABC and Sydney Morning Herald investigation](#) revealed a shocking video of two doctors dancing while performing liposuction on an unconscious patient, which led to a crackdown on the cosmetic surgery industry.

Under the new injectables guidelines there will be a total ban on targeted advertising towards patients under 18, as well as a mandatory seven-day cooling off period between the first consultation and any procedures for minors.

Patients considering cosmetic injectables have been encouraged to check if a health practitioner is registered on the Australian Health Practitioners Regulation Agency website.

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Posted Tue 3 Jun 2025 at 6:29am, updated Tue 3 Jun 2025 at 7:15am