

Cosmetic Crisis

## Inside the Botox black market: Leaked messages reveal ‘illegal’ trading network

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By Clay Lucas and Henrietta Cook

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**A**t 7.48am on Christmas Day in 2020, a desperate plea pinged in a WhatsApp group for nurses subscribing to Australia’s largest cosmetic injectables telehealth company.

The owner of a Geelong skin clinic was frantically trying to buy anti-wrinkle drugs from her peers, an act prohibited under Australian medication laws.

“Very unethical, I know,” she wrote. “But I am open over the Christmas/New Year period and have been left with nothing as the past week we have been inundated. I thought I had enough stock. Please don’t judge me.”

The post was shared to a WhatsApp group for nurses and clinics using the services of injectables company Fresh Clinics, and it triggered swift offers of help. One nurse in South Melbourne replied nine minutes later, offering to supply the drug that day.

It was not an isolated exchange. It’s also illegal.

An investigation by this masthead has unearthed hundreds of WhatsApp messages showing nurses subscribed to Fresh Clinics asking their peers to buy, borrow, or swap prescription-only anti-wrinkle medications, including Botox, Dysport and Xeomin.

Under Australian law these Schedule 4 drugs can only be supplied by licensed wholesalers to authorised prescribers or pharmacists, to safeguard patient safety and control the movement of drugs.

The WhatsApp messages used varied terminology — buy, borrow, sell, grab — but the effect was the same: restricted drugs changing hands outside formal supply channels, arranged via encrypted group chats.

Requests were often met with near-instant offers, highlighting how quickly supply could be sourced through the informal networks.

“Hey guys! Anyone have a spare vial (Dysport or Botox) I can grab asap?” a Melbourne-based nurse wrote in December 2023. “I’m willing to travel anywhere in Melbourne. I’ve already ordered but it didn’t come on time for my patients tomorrow! Would appreciate it heaps.”

Replies arrived within minutes – offers to help out from Melbourne suburbs Frankston, Williams Landing and Blackburn.

“Does anyone have two vials of Botox I could buy off them? I have 3 days left in clinic before going away for 3 months and don’t want to leave anything sitting in my fridge,” said another in an April 2023 exchange.

In one November 2023 exchange, a nurse asked: “Hi team, does anyone stock [cosmetic filler] Sculptra? Can I buy one off you please?” The co-owner of Fresh Clinics, John Holbrook, responds: “You can’t on-sell it. But we can assist to move it across clinics.”

Other nurses offered to sell stock they no longer needed: “I made an order in error – would anyone like to buy some Botox?” a nurse wrote in June 2023. “I can grab some off you,” another replied. “Yes pls!” added a third quickly.

## **Regulators scramble as black market thrives**

As telehealth fuels the expansion of Australia’s booming \$4 billion injectables industry, regulators are scrambling to roll out changes to protect patients.

Asked to respond to the messages, a Victorian Health Department spokeswoman said: “The trading of Schedule 4 medicines between clinics is not lawful.”

A NSW Health spokesman likewise said the medications could only be obtained by an authorised practitioner and could not be resupplied.

Fresh Clinics does not directly employ the nurses working in the injectables clinics. The clinics are independent businesses which pay a subscription to Fresh Clinics to access doctors and medicines.

There is no suggestion Fresh Clinics has broken the law, and in a statement it said it had done nothing wrong.

“Fresh Clinics ensures that all stock transfers between clinics comply with the latest federal and state regulations,” a spokeswoman said.

Dr Christopher Rudge, a lecturer in health practitioner law at the University of Sydney, reviewed the WhatsApp messages and said they illustrated unlawful trading and created an untraceable supply chain.

“These communications illustrate an unlawful black market for prescription-only cosmetic medicines,” he said. “The system loses integrity, meaning that any harmed patients will struggle to obtain a remedy.”

## Fresh Clinics: Built for speed

Under the Fresh Clinics model, nurses, operating as independent businesses, consult with clients, then request a remote video review by a Fresh Clinics doctor, who issues a script. The nurse administers the treatment.

Fresh charges a per patient fee – usually \$25 – and also leaves nurses to handle ordering, storage and administration of the medication.

The model was designed for flexibility. But many doctors who practise in-person medicine argue it removes critical points of clinical oversight.

In March this year, this masthead revealed that some [Fresh Clinics doctor consultations](#) lasted as little as 52 seconds before a script was approved. Following that investigation, new rules released in June by Australia's health practitioner watchdog included tighter rules for first-time patients and restrictions on issuing high-speed telehealth scripts.

## Internal warnings: 'These can't be onsold'

Federal law prohibits the unauthorised sale or transfer of Schedule 4 medicines. Prescription-only drugs must be distributed by licensed wholesalers to authorised practitioners, not traded peer to peer.

Fresh Clinics staff were aware of this. In March 2022 the company's clinical director replied to a nurse post: "These can't be onsold ... onselling of a schedule medication is illegal."

Co-founder John Delaney was more direct when fielding questions via a different WhatsApp forum in April this year: "Wholesalers can only sell to a doctor, nurse practitioner or pharmacist."

Yet elsewhere, other staff advised workarounds. In 2021, co-founder John Holbrook wrote to one nurse: "Hi [name removed], it's not legal for you guys to onsell medication. But [Fresh Clinics staffer] can help out seeing if there's somewhere that Dysport can be borrowed and replaced from."

That "borrow and replace" system was sometimes formalised, other times not. In one message, the company's head of clinical training advised a nurse: "Let us know who you end up getting product from and we will invoice you and send out replacement to the nurse who loans the product."

The nurse responded: "Thanks so much, for sure 'sell' was probably the wrong word to use as I know you guys reimbursed the lender with product."

## Airtasker driver, Kmart Esky

It was May 2021, and a senior Fresh Clinics manager was on the hunt for a new delivery driver. She proposed the company "load a new job every day onto Airtasker with the anticipated jobs for the day".

Then, she posted a job on Airtasker for a driver to deliver for an “aesthetic supply company” at \$840 per week. “Own vehicle necessary,” the ad said.

The job went to Shah, a part-time driver who also delivered auto spare parts. He told this masthead he didn’t know what was in the boxes he would drop off to clinics, just that they were packed professionally.

“Some of them were very urgent, some weren’t,” said Shah, who declined to give his surname. “I just put extra ice inside the Esky. So I had to get the ice ... and I just put it in my car.”

A staff message to Shah from that time reads: “Have you bought the Esky?” Shah replied: “Buying it now in Kmart Broadway.”

Approached about this and other issues raised in WhatsApp messages, the Therapeutic Goods Administration declined to comment, saying responsibility rested with states and the Australian Health Practitioner Regulation Agency. That agency, in turn, referred queries to state health authorities.

Cosmetic physician Ronald Feiner, the medical dean of the Australasian College of Cosmetic Surgery and Medicine, said transporting botulinum toxin, commonly known by the brand name Botox, in an Esky put patient safety at risk.

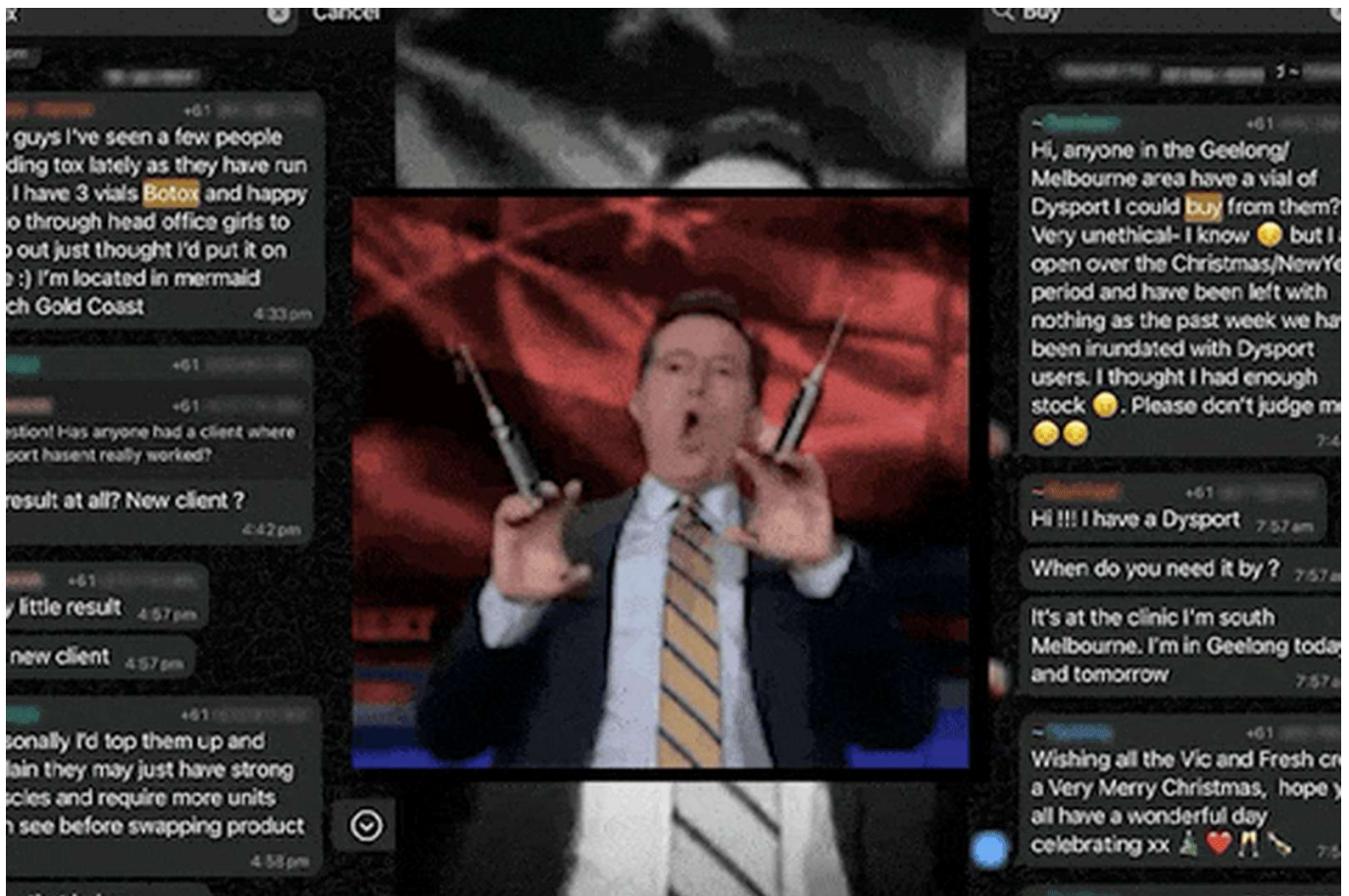
He said the substance must be stored at stable, cold temperatures – usually between 2 to 8 degrees – in order to be effective. Improper handling could compromise product quality and increase the risk of infection and tissue damage, Feiner said.

“It is way below standard and unacceptable,” he said of the Esky transportation. “I wouldn’t accept products transported in that manner and I wouldn’t inject it into my patients. It is completely substandard.”

Feiner is also a co-ordinator at the International Master Course on Ageing Science, which hosts the world’s leading cosmetic dermatology and plastic surgery meeting and reviews cosmetic complications lodged by doctors from around the world.

He said the group reviewed a complication linked to botulinum toxin around once a week, and always questioned whether the substance was stored and transported correctly.

“Improper storage may lead to product degradation, which can cause infections and tissue damage,” he said. “This damage can lead to depressions in the skin like little finger compressions.”



This GIF of US TV host Stephen Colbert was posted in a chat between Fresh Clinics workers. MARIJA ERCEGOVAC

In addition, he said botulinum toxin stored at incorrect temperatures might be ineffective or wear off more quickly.

Other messages seen by this masthead showed Fresh Clinics staff sometimes also adopted a tone that minimised the seriousness of their work.

In a 2021 thread, the company's head of training posted a meme of American TV host Stephen Colbert waving oversized syringes, alongside a text discussing Fresh's \$25 telehealth consults now possible via the company's app. Her caption: "And we don't take any liability LOL."

In another exchange in one of the WhatsApp groups, when a nurse asked if unmixed Botox left out of the fridge could still be used, co-founder Holbrook responded: "It's good for use on yourself/family at a minimum."

## Fresh Clinics goes political

As scrutiny of the injectables industry has intensified in recent years, Fresh Clinics has become more politically active. In May federal lobbying firm Barton Deakin registered as its lobbyist, followed in June by Hawker Britton. In July, PR agency Sling & Stone registered as its third Canberra lobbyist.

Researcher Maddison Johnstone, from advocacy group Operation Redress, said the industry had undercut its own arguments about professionalism.

“It seems the industry has dabbled in the very thing it purports to be against when it suits their commercial interests. Patients deserve better – they pay through the nose and trust licensed clinics are prioritising their safety.”

In response to detailed questions from this masthead, a Fresh Clinics spokeswoman said the company’s “well-connected network of nurses and doctors” included “a private WhatsApp community where we share industry insights, tips, trends and regulatory updates and requirements”.

She said nurses co-ordinating stock transfers with doctor oversight “is consistent with long-standing medical practices, with some stock transfers co-ordinated via private messaging platforms. Fresh Clinics ensures that all stock transfers between clinics comply with the latest federal and state regulations.”

She said while some of the transfers appeared to be selling, swapping and trading, they were in fact not. “While some members may use varying degrees of terminology, Fresh Clinics monitors this channel and corrects any misused language where possible.”

A NSW Health spokesman said that under the state’s Poisons and Therapeutic Goods Act, cosmetic medicines like botulinum toxin can only be bought by an authorised practitioner, such as a doctor or nurse practitioner.

He stressed that these drugs “cannot be resupplied to another clinic or authorised practitioner”.

The NSW regulator warned that anyone suspected of breaking these laws would be investigated.

And, just as in Victoria, which said trading Schedule 4 medicines between clinics was not lawful, a Queensland Health Department spokeswoman said: “‘swapping’ or ‘borrowing’ Schedule 4 medicines amounts to ‘buy’ and ‘supply’, which is not permitted in Queensland unless authorised”.

Dr Christopher Rudge, who also reviewed the messages, said the behaviour constituted professional misconduct that could lead to a tribunal revoking a practitioner’s registration.

## **A system built for speed – not scrutiny**

The hundreds of WhatsApp screenshots seen by this masthead show clinic owners and nurses often operating with a sense of urgency to maintain supply.

And while senior staff at Fresh Clinics can be seen intervening on some exchanges to remind nurses not to on-sell products, the messages are otherwise devoid of references to bodies like



Researcher Maddison Johnstone.  
PAUL HARRIS

the TGA and state health laws, or consulting pharmacists.

The Christmas Day message at the start of this story from the Geelong clinic owner, who this masthead attempted unsuccessfully to contact, still stands out: “Very unethical, I know ... Please don’t judge me.”

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