



Australian Government
Department of Health and Ageing

DEPUTY SECRETARY

Mr Gavin Jones
Director
Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 520
MELBOURNE VIC 3001

Dear Mr Jones

RE: TACKIT 35146 - Australasian College of Cosmetic Surgeons application for authorisation A91106

Thank you for the opportunity to make a submission on the above application for authorisation. Currently, the Australasian College of Cosmetic Surgeons (ACCS), and the proposed specialty of Cosmetic Medical Practice are not recognised either under Schedule 4, Health Insurance Regulations, 1975, or on the *AMC List of Australian Medical Specialties*. An application for the latter is currently under consideration by the Recognition of Medical Specialties Advisory Committee of the Australian Medical Council (AMC). If this is successful, they would then be required to apply to the Specialist Education Accreditation Committee of AMC to be accredited as the provider of standards, training and certification in this proposed specialty.

It is our belief that the likely public benefit of the proposed arrangements would only accrue if the above recognition of the specialty and of ACCS as the provider of standards, training and certification was confirmed.

There is also a risk that if authorisation was granted prior to the recognition and accreditation processes being complete, that this might be construed as a form of recognition of ACCS and the proposed specialty, placing undue and inappropriate pressure on the AMC's processes.

Therefore, at this stage we believe the authorisation should not be approved, but may be reconsidered if their application for recognition and subsequent accreditation is successful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Kalisch', written in a cursive style.

David Kalisch
Deputy Secretary
15 December 2008