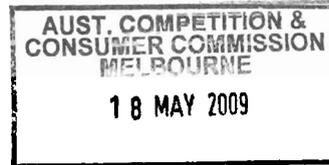
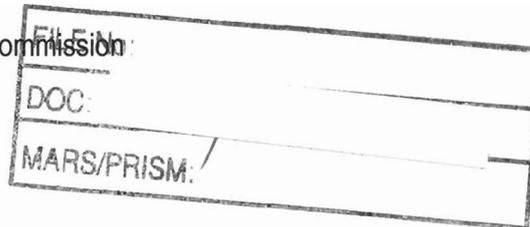


13 May 2009



Mr Gavin Jones
Director
Adjudication Branch
Australian Competition & Consumer Commission
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Dear Mr Jones,

**Australasian College of Cosmetic Surgery
Application for Authorisation A91106 – amended Code of Practice**

I am responding to your letter dated May 4 regarding the College's revised Code of Practice.

There has been much discussion in the submissions and at the Pre-decision Conference held on the proposed Code of Practice and the Bylaws; on its need and its relevance.

As previously stated the **APB** believes that voluntary codes of practice have an important role in professional bodies and industry associations in governing conduct, claims of expertise and behavioral expectations.

In our original submission the **APB** expressed its concern with section 2 of the original Code:

2. *Superlatives should be used with caution in descriptions of person or procedures, and should not suggest that practitioner is superior to other qualified practitioners either through training or performance of a skill unless that can be readily proven.*

Formerly the APB highlighted the objective nature of the word "superlative" and our concerns on the possible misuse of "discretionary claims of success etc".

I now believe that the reworded 2.3 provides improved meaning in the use of superlatives.

The Advertising and Promotion section of the ACCS Code will certainly assist to provide clarity to our Members when accepting and assessing advertisements from those offering cosmetic procedures, in light of the susceptibility and high expectations of consumers when procuring these services.

The **APB** does not believe that the advertising provisions would have an adverse impact or effect on competitive advertising.

Yours faithfully,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal line extending to the right.

**Lianne Richards
Executive Director**