

FAQ - Medicines in beauty treatment/cosmetic businesses

15 April 2025

Frequently Asked Questions

1. Has there been a change in legislation?

There have been no changes to the *Medicines and Poisons Act 2019* (Qld) (MPA) and Medicines and Poisons (Medicines) Regulation 2021 (Qld) (MPMR) relevant to medicines used in the cosmetic industry, since these laws commenced in September 2021.

2. If there hasn't been any change to the legislation, why has this factsheet been published now?

During routine compliance activities undertaken by Queensland Health, it became evident that further guidance for the industry was required.

A fact sheet was released in December 2024 to support industry to better understand the requirements of the existing legislative framework in Queensland.

Following subsequent engagement with industry, a revised fact sheet has been published to clarify some aspects of the legislation and provide details of compliant business models.

3. Why are these controls in place?

The controls around medicines are in place to prevent harm to the public by ensuring they are managed in an appropriate, effective and safe way. This is reflective of the purposes of the MPA.

4. Will clinics who are not compliant be told to close immediately?

Queensland Health understands that some instances of non-compliance in the industry are not necessarily deliberate. In the first instance, depending on the severity of the non-compliance, our approach will be to educate clinics on how to become compliant.

5. What do clinics need to do?

Clinics should ensure they are meeting the requirements of the legislation.

The revised factsheet provides additional guidance on permitted activities and compliant business models. If any more information is required, clinics can engage with Queensland Health for further guidance and support to achieve compliance.



6. Can registered nurses (RNs) buy stock of Schedule 4 (S4) medicines for use at their beauty treatment/cosmetic businesses/clinics?

No, RNs are not authorised under the legislation to buy stock of S4 medicines for these businesses/clinics.

RNs are authorised under the MPMR to buy medicines listed in the Extended Practice Authority called 'Registered Nurses', however, this does not include S4 medicines used for beauty treatment/cosmetic businesses/clinics.

7. Can RNs or administrative staff order, request, or arrange for stock of S4 medicines to be delivered to a clinic via third-party websites or applications, including directly with a wholesaler? What if no payment is made?

No, the action of 'ordering' S4 medicines constitutes buying of the S4 medicines under the MPA, because it is attempting to obtain the medicine, whether or not payment is made.

RNs are not authorised to buy stock of S4 medicines for their clinics, and administrative staff are not authorised to buy stock of S4 medicines.

8. Can doctors who are not physically practising at a clinic buy stock of S4 medicines for that clinic?

No, doctors cannot buy stock of S4 medicines for a clinic where they do not have exclusive custody and control of the medicines. Doing so would constitute supplying the S4 medicines to persons, such as RNs, who are not authorised to buy the S4 medicines, or to possess the S4 medicines as stock.

9. Do I need to have a doctor at my clinic? Can telehealth be used for prescribing?

The MPA and MPMR do not prohibit doctors and Nurse Practitioners (NPs) from consulting with clients via telehealth, including if the doctor or NP subsequently lawfully prescribes S4 medicines for the clients they consult with.

The revised factsheet provides additional guidance on permitted activities and compliant business models.

10. How can cosmetic injectable medicines be dispensed in Queensland?

'Dispense' means to sell a medicine on prescription, and in Queensland only pharmacists and medical practitioners (doctors) are authorised to dispense cosmetic injectable medicines.

Medicines can only be dispensed from lawfully obtained stock, which in Queensland means stock bought on a purchase order.

Dispensing of medicines in Queensland must be compliant with Chapter 4, Part 8 of the MPMR, including dispensing on a lawful prescription. Dispensed medicines must also have a label affixed that meets the requirements for a dispensing label in the Commonwealth Poisons Standard, Appendix L.

There may be other restrictions in other States or Territories and there may also be professional practice limitations.

11. Other States allow RNs to possess a stock of medicine in their clinics, why is it different in Queensland?

Each State and Territory has its own laws that govern how medicines must be handled in that State or Territory. Queensland's MPA and MPMR detail the authorities and limitations relevant to regulated substances placed on different health professionals in Queensland.

In Queensland, RNs cannot possess a stock of S4 medicines for use in their clinics.

However, RNs may hold individually dispensed medicines for individual clients.

12. What is Queensland Health doing now?

Queensland Health will continue to engage with industry to develop a greater understanding of the issues and compliant practises.

We are committed to working closely with industry to support clinics, wholesalers and prescribers to achieve compliance.

Further information

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