

Medicines in beauty treatment/cosmetic businesses

Medicines and Poisons Act 2019 (Qld) – 15 April 2025

Cosmetic injectables

Following the initial release of this Queensland Health fact sheet in December 2024, and subsequent engagement with industry, this fact sheet has been revised to further clarify the obligations of cosmetic injectables clinics, online service providers and wholesalers.

To clarify, there have been no changes to the legislation mentioned in this fact sheet since September 2021 that are relevant to the scenarios outlined.

Medicines commonly associated with beauty treatment/cosmetic businesses include the cosmetic injectables **botulinum toxin** (sold under the brand names Botox® and Dysport®) and **dermal fillers** such as collagen, hyaluronic acid and polylactic acid. These substances are classified as Schedule 4 (**S4**) 'prescription only' medicines and are regulated in Queensland under the *Medicines and Poisons Act 2019* (Qld) (**MPA**) and the Medicines and Poisons (Medicines) Regulation 2021 (Qld) (**MPMR**).

This fact sheet provides guidance on the buying, storage and use of S4 cosmetic injectable medicines in Queensland in accordance with the regulatory scheme in the MPA and MPMR.

Key messages

- Registered Nurses (RNs) are not authorised to buy S4 cosmetic injectable medicines.
- Only a medical practitioner (doctor) or nurse practitioner (NP) can buy S4 cosmetic injectable medicines to hold as stock for use at a clinic where they will exercise exclusive custody and control over the stock of S4 medicines (or joint custody and control only with another doctor or NP).
- RNs are only permitted to possess S4 cosmetic injectable medicines for a purpose mentioned in the table in Schedule 7, Part 3, s 11 of the MPMR, including administering a medicine on a prescription, or in accordance with its approved label.

In all cases, doctors, NPs and RNs must only work within their scope of practice. Prescribers must ensure that RNs acting on their prescriptions have the necessary competencies to do so.

Reference is made to the term 'stock' throughout this fact sheet.

It is important to note that as per Schedule 1 of the MPA, **stock** means—
(a) a regulated substance that is intended for supplying a place or a person who is authorised to carry out a regulated activity with the substance; or
(b) a regulated substance that is not sold or dispensed to a particular person.

This means that a reference to 'stock' of medicine, does not include a medicine that has been dispensed for an individual person.

Authorisations for prescribing and administering S4 cosmetic injectables

In a beauty treatment/cosmetic business setting, the only persons who can prescribe S4 cosmetic injectables are doctors or NPs (collectively referred to as 'authorised prescribers').

Note that in Queensland the term 'prescribe' (defined in the MPA), for a person the authorised prescriber has assessed, includes:

- writing a prescription for a person to be dispensed by a pharmacist or doctor;
- making a written prescription, for example on a medication chart prescription, for an RN to administer; or
- giving an oral prescription to an RN to administer a medicine to a particular person.

An authorised prescriber must assess the intended medicine to be reasonably necessary for the therapeutic treatment of each individual client of a beauty treatment/cosmetic business before writing or giving an oral prescription for the client.

Key Points:

1. If a prescription for dispensing an S4 cosmetic injectable medicine is written for a client, then the medicine will need to be dispensed by a doctor or pharmacist on presentation of the prescription.
2. The S4 cosmetic injectable medicine can then be used in accordance with the instructions on the dispensing label.
3. If an authorised prescriber provides an oral prescription for administration of an S4 cosmetic injectable medicine to a client, then the authorised prescriber must ensure that the prescription is only given to a person authorised to dispense or administer the medicine, for example to an RN or enrolled nurse to administer (noting enrolled nurses can only administer a medicine under the supervision of a doctor or RN).

4. In all cases, administration of the medicine must be done in accordance with the instructions detailed in the prescription or on the dispensing label.
5. For any S4 prescriptions, either for dispensing or for administration, the prescription must contain the details required under Chapter 4, Part 6 of the MPMR for a lawful prescription. For more information please refer to the [Writing lawful prescriptions](#) fact sheet.

Standing Orders

What is a standing order?

Schedule 1 of the MPA defines a 'standing order' as follows:

"standing order, for a medicine, means a document authorising the medicine to be administered or given as a treatment dose at a stated place or in stated circumstances."

Under the MPMR, the use of a standing order is limited to certain circumstances, including at an institution such as an aged care facility, hospital, prison or detention centre. For more information, please refer to the [Standing orders](#) fact sheet.

Standing orders cannot be used for the administration of cosmetic injectables to clients by RNs in a beauty treatment/cosmetic business.

Buying S4 cosmetic injectables

Only doctors or NPs may buy stock of S4 cosmetic injectable medicines for use at a beauty treatment/cosmetic business, and only in accordance with the MPMR.

It is important to note that in Queensland, 'buying' a regulated substance [defined in section 22 of the MPA] includes:

- a) 'giving a purchase order' for the cosmetic injectables, such as when stock is ordered through an app or website and payment is made to a service provider or pharmaceutical company; or
- b) 'attempting to obtain the substance'.

Under s 22(b) of the MPA, whether a person is offering or providing consideration in exchange for a regulated substance, is not determinative of whether a person is buying a regulated substance.

When buying a stock of S4 cosmetic injectable medicines:

1. For a paper purchase order, the doctor or the NP must complete and sign the purchase order themselves.
2. If the doctor or NP sends a purchase order to a supplier using an electronic system, they can use a unique identifier in the purchase order. For example, where the buyer has a unique username or account number set up with the supplier, this can be shown on the purchase order when the buyer uses a secure ordering website.

No other person can use this unique username or account number to buy medicines on that secure ordering system e.g. an RN does not have an authorisation to buy S4 cosmetic injectable medicines and cannot do so on behalf of a doctor or NP.

Where the stock of medicine is to be delivered, the purchase order must state—

- (i) the street address of the buyer; or
- (ii) an authorised place at which the buyer is authorised to possess the stock.

This means stock can only be delivered to a place where the authorised buyer, such as a doctor or NP, is authorised to possess the stock.

Furthermore, doctors and NPs cannot buy stock of S4 medicines on behalf of beauty treatment/cosmetic businesses in circumstances where RNs, enrolled nurses, administrative staff, or other unauthorised persons will have custody or control of the stock of S4 medicines upon delivery.

Doing so constitutes a supply (as per the MPA and MPMR) of the cosmetic injectables from the doctor or NP to the unauthorised persons at the cosmetic injectables clinic. This is the case even if there are contractual obligations not to access the stock of S4 medicines.

In Queensland, 'supply' [defined in section 24 of the MPA] means to sell or give the medicine (in this case cosmetic injectables) to a person, but does not include administering the medicine.

The quantity of the medicine supplied is immaterial, as is whether or not the medicine is supplied by indirect means.

This means that actions that may be considered by some doctors and NPs to be 'buying' medicines for, or on behalf of, a clinic, including arranging for cosmetic injectables to be delivered at a 'remote' nurse-led cosmetic injectables clinic, actually amount to 'supply' under the MPA and MPMR; which is not permitted.

Doctors and NPs are not approved persons to supply a stock of cosmetic injectables for use at cosmetic injectables clinics where they will not have exclusive custody and control over the stock, including where cosmetic injectables are supplied 'on consignment'.

Importantly, under the MPA, 'buying' is a separate type of action to 'supply', and this distinction is relevant for beauty treatment/cosmetic businesses to ensure they are compliant with the MPA and MPMR.

Supplying S4 cosmetic injectables

A supplier, such as a licensed medicine wholesaler or a pharmacist, can only supply S4 cosmetic injectables to a person who is authorised under the MPMR to buy the medicines.

Under the MPMR, a buyer who is authorised to ‘give a purchase order’ may send the purchase order to a supplier. Buying by giving a purchase order must be compliant with the requirements outlined in **sections 48 to 53 of the MPMR**.

The supplier also has requirements that must be met before they can supply on a purchase order, as outlined in sections 54 to 62 of the MPMR. For supply of S4 cosmetic injectables, these include that the supplier must:

- Have a reasonable belief that the buyer—
 - (i) is authorised under the MPA to give a purchase order or otherwise buy the stock; or
 - (ii) is permitted under a corresponding law or another law to obtain the stock; and
- obtain a compliant purchase order for the stock from the buyer.

Possession and storage of S4 cosmetic injectables

The storage of S4 cosmetic injectable medicines at a clinic where RNs have custody or control of them, either jointly or independently, results in RNs being considered to be in possession of the S4 cosmetic injectables.

Authority for RNs to possess S4 medicines is limited by schedule 7 of the MPMR.

RNs are only permitted to possess S4 cosmetic injectable medicines for a purpose mentioned in the table in Schedule 7, Part 3, s 11 of the MPMR, including administering a medicine on a prescription, or in accordance with its approved label. Authorities given to RNs under the ‘extended practice authority called Registered Nurses’ do not include authorities relevant to cosmetic injectable medicines.

This means that RNs are not approved persons authorised to be in possession of a **stock** of S4 cosmetic injectables, either individually or jointly with other persons who are authorised to be in possession of a stock of S4 cosmetic injectables, including on a ‘consignment’ basis.

Appointment of medicine store establisher and medicine store manager

Under the MPMR, where medicines are stored in a ‘shared clinic’ [defined in section 195 of the MPMR], being a place where more than one person will be possessing the stored medicines to use for supply or administration, the person in charge of the shared clinic must appoint, in writing, an appropriately qualified person as a medicine store establisher. NB: If a different person possesses the same stock of medicines at the place on another day or time, this is still considered to be a shared clinic.

An appropriately qualified person should be a person who is authorised to possess the medicines such as a doctor or NP. The medicine store establisher’s responsibilities are to establish and maintain a medicine store for storing S4 medicines (and S2 or S3 medicines) at

the shared clinic. The person in charge of the shared clinic must also appoint, **in writing**, a medicine store manager.

If the place only has a 'sole practitioner' who is authorised to possess and administer the medicines (i.e. a doctor or NP), then that practitioner is the medicine store establisher and the medicine store manager for that place.

A sole practitioner is a person who works at a place where they are the only person who will possess the medicines for independently practising a profession or performing a function at the place.

The medicine store establisher must take **all reasonable steps** to ensure the medicine store, used for the storage of medicines, is established and maintained in a way that keeps the medicines in the store in accordance with the manufacturer's conditions for the medicines.

Each medicine store for a place must be in an area where the medicine store establisher reasonably believes a member of the public could not access the medicine store without being seen by a worker at the place. The medicines must only be taken from the medicine store when intended to be administered to a client.

Permitted business models

The following pathways are permitted under the MPA and MPMR to obtain and use medicines in cosmetic injectables clinics:

A. Where a doctor or NP has exclusive custody and control of S4 medicines at a clinic or joint custody and control of S4 medicines at a clinic with another doctor or NP

1. The doctor or NP may buy S4 medicines to hold as stock for use at that clinic.
2. Following consultation with a client, the doctor or NP may prescribe an S4 cosmetic injectable medicine for:
 - a. administration by a person authorised to administer the medicine, for example, an RN;
 - b. dispensing by a person authorised to dispense the medicine (a doctor or a pharmacist), which does not include a NP or an RN.

Key points:

- Only a doctor or NP can buy S4 cosmetic injectable medicines to hold as stock for use at a clinic where they will exercise exclusive custody and control over the stock of S4 medicines (or joint custody and control only with another doctor or NP).
- RNs are not authorised to buy S4 cosmetic injectable medicines.

- Doctors and NPs working remotely cannot buy a stock of S4 cosmetic injectable medicines for a nurse-led cosmetic injectables clinic. This action constitutes a 'supply' of the medicines from the doctor or NP to the RNs at the clinic. This is not authorised under the MPA and MPMR because doctors and NPs are not authorised to supply stock and RNs are not authorised to buy this stock. This will be the case even if there are contractual obligations not to access the stock of S4 medicines.
- If the prescription authorises administering the S4 cosmetic injectable medicine, an RN will be authorised to possess the S4 cosmetic injectable medicine only for the purpose of administering the S4 cosmetic injectable medicine to that individual client and must administer the medicine in accordance with the prescription.
- If the prescription authorises dispensing the S4 cosmetic injectable medicine, once it has been dispensed, it may subsequently be administered by a person who is authorised to administer the medicine, including an RN, in accordance with the dispensing label.

B. Where a doctor or NP provides services to a nurse-led cosmetic injectables clinic from a 'remote' location (using dispensed S4 cosmetic injectable medicines)

1. Following consultation with a client, which may include telehealth consultation, a doctor or NP may prescribe an S4 cosmetic injectable medicine for dispensing only.
2. The S4 cosmetic injectable medicine may be dispensed by any doctor or pharmacist and taken/sent to the nurse-led clinic.
3. The dispensed S4 cosmetic injectable medicine may subsequently be administered by a person at that clinic who is authorised to administer the medicine, including an RN, in accordance with the dispensing label.

Key points:

- In these circumstances, only dispensed medicines (those that have been dispensed by a doctor or pharmacist) can be held at the clinic for the purpose of being administered in accordance with the dispensing label.
- The RN at the nurse-led cosmetic injectables clinic will be authorised to possess the dispensed S4 cosmetic injectable medicine for the purpose of administering the medicine to an individual client in accordance with the dispensing label.

In summary, to be compliant with the MPA and MPMR, cosmetic injectables clinics are only authorised to hold S4 cosmetic injectable medicines at the clinic by either:

- a) **Engaging a doctor or NP who practices their profession at the clinic and is authorised to buy and hold 'stock' of the S4 cosmetic injectable medicines, and who will exercise exclusive custody and control of S4 medicines (or joint custody and control only with another doctor or NP).**

OR

b) If using a 'remote' online/telehealth service provider for doctor or NP consultations, only have S4 cosmetic injectable medicines on hand which have been dispensed for each individual client of the clinic, following consultation with a doctor or NP.

Other important information

Advertising of S4 cosmetic injectables

Advertising of S4 cosmetic injectables is not permitted. The Therapeutic Goods Administration (TGA) has strict controls on advertising.

Further information is available on the TGA page [Referring to cosmetic injectables in advertising](#).

Buying and administering S2 and S3 medicines

At any premises where there **is not** an approved person administering medicines, namely a doctor, NP or RN, no other persons can buy stock or administer S2 or S3 medicines, such as numbing creams that contain lidocaine.

These are identified by a signal heading on the medicine's container that states 'Pharmacy Medicine', which means it is an S2 medicine or 'Pharmacist Only Medicine', which means it is an S3 medicine.

Infection control requirements

Persons who operate a beauty treatment/cosmetic business also have legislative obligations under the *Public Health (Infection Control for Personal Appearance Services) Act 2003* (Qld) to minimise the risk of infection.

Refer to [Personal appearance services | Queensland Health](#) for further information.

Where cosmetic injectables are provided as a service from a health-care facility, operators are required to comply with Chapter 4 of the *Public Health Act 2005* (Qld), including having an infection control management plan.

Refer to [Infection control management plans | Queensland Health](#) for further information.

Further information

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