



Mrs. Elena Santiago CID
Director General
CEN-CENELEC Management Center
Avenue Marnix 17, 1000 Brussels

Knokke, March 16, 2018

Dear Mrs Santiago

As president of the European Association of Aesthetic Plastic Surgery Societies (EASAPS) I represent all the plastic surgeons with an interest in aesthetic procedures. On behalf of them, I am writing you to express our worry concerning the meeting on March 20th about the safety issues with laser, peeling, micro needling and radio frequency in the proposed Beautician standard Pre-EN 16708.

The purpose of this letter is to make you aware of the very serious concerns the medical community has expressed to CEN about acknowledging these 4 technologies to non-medical personnel.

In our opinion the main purpose of producing a standard in the aesthetic field is to protect the patient and not protect the industry for whom this standard may be highly profitable. Germany is protesting our claim for a defective standard and Germany is represented in TC 409 by a laser machine manufacturer?! This cannot be a coincidence.

We have been working for years trying to guarantee maximum patient safety, on behalf of all stakeholders: doctors, patients, clinic owners, government representatives even when it is against our personal interests. We believe that the aforementioned treatments have critical safety problems, easily creditable through medical documentation. We know that if these treatments can be performed by non-medical personnel, the health consequences will be very serious. "A sanitary crisis is waiting to happen" has been stated by prof. Sir Bruce Keogh in his final report on the Review of the Regulation of Cosmetic Interventions for the Department of Health in the UK. Most of these treatments have been addressed in EN 16844 so it is surprising to see them in a different standard for other actors. It is also surprising to see that CEN allows a standard to be proposed that does not even follow other established standards such as those on sterilization. The beautician standard clearly does not understand the difference between disinfection and sterilization which is the reason for a second claim against a defective standard. So far we have not had any reply of CEN on this second claim.

We believe that estheticians are trained to perform other type of procedures than the proposed advanced treatments that are clearly medical. It is not appropriate to have a standard that states that they can perform procedures that have been reported as possibly harmful by numerous sources, both legal and medical.

Therefore, we ask you to reconsider this important matter in the name of good practice and to guarantee the excellence of European standards preventing that purely medical treatments (laser,

peelings, microneedeling and radiofrequency) are included in a standard or technical specification that allows them to be performed by non-medical personnel.

This position is supported by many other scientific medical organizations throughout Europe and the world.

In the event that BT-CEN decides to allow the Beautician standard to be published with the advanced treatments included or in adnex as Technical Specification, and without correcting the disparity between disinfection and sterilization, we will be obliged to take the necessary actions to combat above mentioned standard or technical specification.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'I. van Heijningen', with a large, stylized flourish above the name.

Ivar van Heijningen
President EASAPS

http://www.easaps.org/?page_id=27