

# AHPRA and TGA Advertising Rules for Aesthetic Clinics: A Practical Guide

Australian aesthetic clinic advertising is governed by two regulators at once: AHPRA governs the practitioner and how the service is promoted, and the TGA governs the product, which means most cosmetic injectables, as prescription-only medicines, cannot be advertised to the public at all.

Written by Mitchell Kwan, an aesthetic clinic marketing consultant based in Perth, Western Australia, who builds AHPRA-compliant campaigns for aesthetic clinics. He ran his own clinic's marketing through the two shifts that broke most online advice: the TGA's 7 March 2024 tightening on injectable language and AHPRA's 2 September 2025 non-surgical regime.

## Who the rules apply to

- Section 133 of the National Law binds whoever controls the advertising content. The clinic entity carries responsibility, not only the practitioner.
- AHPRA's higher-risk non-surgical cosmetic guideline took effect 2 September 2025 and binds all registered health practitioners, nurses and dentists included. The earlier cosmetic surgery guidelines (1 July 2023) applied to registered medical practitioners.
- A clinic is responsible for content produced by influencers, ambassadors, and marketing agencies. Liability can sit with more than one party at once.

## The big prohibitions

- **Testimonials for regulated health services.** A banned testimonial is praise about the clinical side: the reason for treatment, the treatment itself, or the outcome and skill of the practitioner. Liking, replying to, screenshotting, or re-sharing a patient's clinical praise counts as using a testimonial. AHPRA recommends disabling reviews, comments, and tagging on pages the clinic controls.
- **Advertising prescription-only substances.** Most cosmetic injectables are Schedule 4 and cannot be advertised to the public. No brand names, substance names, nicknames, abbreviations, or hashtags. Since the TGA's 7 March 2024 tightening, generic terms like "anti-wrinkle injections" and "dermal fillers" are no longer expressly permitted where a reasonable consumer reads them as promoting a prescription medicine. Publishing injectable prices, per unit or total, is treated as advertising the product. A booking system that lets the public self-select a prescription-only treatment can itself be the breach.
- **Before and after photos without the required conditions.** Genuine patients of that practitioner who had that procedure, no filters or retouching, a prominent outcomes-vary warning, the "after" image not the most prominent or first, a note of how long after it was taken, and never anyone under 18.
- **Therapeutic and misleading claims.** Advertising is judged on its overall impression, including what it omits. Words like "safe", "effective", "risk-free", or "pain-free" without acknowledging risks count as misleading. Manufactured urgency around someone's health breaches the rule against encouraging unnecessary use.
- **Penalties.** Up to \$60,000 per offence for an individual and \$120,000 for a company, and a breach can be treated as professional misconduct.

## What clinics can do

- Advertise the consultation and the concern it addresses, not the treatment or the product.
- Use non-clinical reviews: clean clinic, friendly team, easy booking, clear communication.
- Market energy-based and non-scheduled treatments, where the rules are far more permissive.
- Put visible terms on every offer: expiry, eligibility, what is included.

- Be specific inside the consultation. Individualised clinical advice to a clinic's own patient is not advertising, so the product can be named and discussed in the room.

## **Common Meta ads failure modes for clinics**

- Ad copy or hashtags that name or hint at a prescription-only injectable.
- Price-led injectable offers in the ad or on the landing page.
- A booking flow behind the ad that lets the patient self-select the prescription treatment or see its price.
- Clinical testimonials sitting in the comments of a boosted post the clinic controls.
- Higher-risk cosmetic ads on social media not classified as adult content, a concrete setup step required since 2 September 2025.
- Old posts with brand hashtags left live. Historical posts are not grandfathered.

## **Disclaimer**

This is practical guidance for clinic owners, not legal advice. The rules moved twice in 18 months and can move again. Check the current AHPRA advertising guidelines and the TGA's cosmetic injectables FAQ before relying on any specific wording, and get advice from a health-law specialist for anything contested. The full source-linked version lives at <https://mitchellkwan.com/insights/ahpra-tga-advertising-rules-aesthetic-clinics>