

Template for comments and secretariat observations

Date: 20 th January 2014 (IMO) Irish Medical Organisation	Document: CEN/TC 403 N 176 Aesthetic Non-surgical Medical Services
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1	2	(3)	4	5	(6)	(7)
MB ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted
Ire IMO	Page 5 - Introduction		GE	<p>The Irish Medical Organisation (IMO) is opposed to the developments of healthcare standards at CEN. The IMO maintain that standards for healthcare services should be developed, implemented and monitored by the relevant competent authorities in consultation with the medical profession so as to ensure the highest standards of care. All European and International medical professional bodies are opposed to the development of healthcare standards at CEN. Attached please find Council Resolution on Standardisation in Medical Practice and Patient Safety issued by the World Medical Association (WMA) at its General Assembly in Fortaleza in October 2013.</p> <p>The IMO recognises the urgent need to regulate for the provision of aesthetic surgery and non-surgery services at National level in many EU member states including Ireland. However the IMO and all European Medical Organisations believe that the development of standards by CEN, the European industrial standards body, is a poor substitution for adequate national regulation.</p> <p>There is a general concern from the medical profession in regarding the introduction of such specific standards to medical procedures. Not only is education and training far from being harmonized throughout the EU medical training, resources, equipment and even specialties themselves differ significantly around the EU. Currently, the disparities between Member State's medical education and training, along with resources and facilities are too great to provide such universal standards that have been developed by CEN and not by the profession</p>	The Irish Medical Organisation strongly opposes this standard and recommends that CEN stop work on this standard immediately.	

1 **MB** = Member body (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

NOTE Columns 1, 2, 4, 5 are compulsory.

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				<p>itself. There is a risk that European Standards are set at the lowest common denominator undermining the efforts of national bodies to ensure the highest quality of care.</p> <p>Healthcare standards must be developed by national competent authorities in consultation with the medical profession and take into account medical training, resources and the organisation of health care services in each member state.</p> <p>There is support at EU level for the development of European Standards for Healthcare as stated in the Council of the European Union issued Recommendation 2009/C151/01 on Patient Safety. However a more appropriate forum for the development of health care standards must be found at European level that promotes the high quality care and patient safety across Europe and ensures that standards are developed by competent authorities in consultation with the medical profession.</p>		

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