

To: The Honourable Dr. Pakishe Aaron Motsaoleli

Minister of Health

Private Bag X828

Pretoria, 0001

South Africa

Email: minister@health.gov.za

Subject: Request for Consideration and Engagement Regarding the Regulation of
Somatology Under the Allied Health Professions Council of South Africa

Dear Minister Motsaoleli,

On behalf of Solidarity, a registered trade union representing professionals across various sectors in South Africa—including the somatology and wellness industry—we wish to offer a constructive submission regarding the proposal to register somatology under the Allied Health Professions Council of South Africa (AHPCSA), which we understand has been referred to your office for final consideration.

We write not in opposition to regulation per se, but to advocate for a regulatory approach that is consultative, evidence-based, economically sustainable, and legally sound. Our concern is not with the principle of regulation, but with ensuring that any future framework is fit for purpose and does not unintentionally disrupt employment, small businesses, or the broader ecosystem of professional practice within somatology.

1. The Need for Guided Regulation, Not Rushed Intervention

Solidarity supports professional regulation where it enhances public safety, ensures ethical standards, and protects the integrity of professions. However, we believe that the current proposal

lacks sufficient clarity, stakeholder alignment, and economic impact assessment. In its current form, the move to register somatology under the AHPCSA risks imposing a disproportionate administrative and financial burden on practitioners and business owners—many of whom are women, youth, and small-scale entrepreneurs.

We therefore urge the Department of Health to approach this matter strategically, with a view to guiding regulation, rather than enforcing a one-size-fits-all model derived from clinical or medical contexts that may not fully reflect the diverse realities of the somatology sector.

2. Existing Industry Frameworks Must Be Acknowledged

The somatology and beauty therapy industry has been functioning under existing institutional and labour structures for decades. These include:

- The National Bargaining Council for Hairdressing, Cosmetology, Beauty and Skincare, which regulates employment conditions and minimum wages;
- A network of professional bodies such as SAAHSP, which uphold ethical conduct, scope of practice standards, and CPD requirements;
- Accredited training institutions (both private and public) offering qualifications and short courses in line with SAQA and CHE frameworks;
- Product houses and short-course providers that support ongoing education and clinical product usage through non-statutory frameworks;
- A robust ecosystem of entrepreneurial salons and clinics—often multidisciplinary—employing staff under labour legislation and operating in accordance with health and safety regulations.

A regulatory model that does not account for these frameworks risks duplicating oversight, confusing compliance, and weakening the industry's ability to operate efficiently and legally.

3. Current Gaps That Require Targeted Attention

We acknowledge that the sector faces challenges, including:

- Unqualified or untrained individuals operating without oversight in high-risk procedures (e.g., advanced aesthetic treatments);
- Workplace exploitation, especially of young graduates, which is better addressed through labour enforcement and bargaining council interventions;
- Inconsistent training standards across providers, which can be improved through standardization within existing NQF-based frameworks;
- A lack of clear differentiation between beauty therapy and clinical aesthetics, which could be clarified through a revised scope of practice model.

However, these gaps should be addressed through tailored solutions, not through blanket reclassification that places all somatologists under a clinical health professions framework.

4. Request for Ministerial Engagement and Collaborative Process

Given the complexity and potential consequences of this regulatory shift, Solidarity respectfully requests that:

- A formal impact assessment be commissioned to evaluate the employment, training, and economic effects of registration;
- The Minister consider postponing any gazetted registration until such time as a working group—including government, labour, educational, and professional stakeholders—has been convened;
- The Department of Health pursue dual-path regulation options where appropriate: e.g., separating clinical aesthetics from general beauty practice, and allowing professional bodies to retain oversight over non-medical wellness treatments;

- Transitional provisions be developed in consultation with stakeholders to protect existing practitioners, business owners, and training institutions.

We are committed to working collaboratively with the Department, the AHPCSA, and other stakeholders to co-develop a responsible, context-sensitive, and enforceable regulatory approach.

We thank you for your attention to this matter and trust that the voices of industry practitioners, employers, and labour representatives will be heard as part of your deliberation.

Yours sincerely,



Johan Roos

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