

20 November 2025

FROM: Solidarity Trade Union

TO:

The Honourable Minister of Health

REGARDING: Proposed Regulation of Somatology Under the AHPCSA

Honourable Minister Dr Motsoaledi,

Solidarity hereby submits the attached formal written response regarding the proposed statutory regulation of Somatology under the Allied Health Professions Council of South Africa (AHPCSA).

Following public notice of the proposal, there has been a significant response from stakeholders across the somatology, aesthetics, beauty and wellness sectors. The matter has also received public attention through media coverage and discussions across multiple professional and industry platforms. Practitioners, employers, training institutions, and emerging professionals have expressed substantial concern regarding the potential implications of the regulatory model as currently framed.

As part of our engagement process, Solidarity has facilitated sector-wide dialogue and collected written input from affected parties. These reflect real-world operational realities, potential labour-market consequences, and the importance of existing qualifications and pathways within the National Qualifications Framework.

In addition to this letter and the formal submission, we have also communicated with the Minister of Trade, Industry and Competition and the Minister of Employment and Labour to ensure that all relevant government portfolios are made aware of the potential socio-economic implications should these proposed regulations be implemented.

Our submission supports the principles of public protection, ethical practice, and professional standards. However, we respectfully request that the regulatory process be paused to allow for:



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1. A full socio-economic impact assessment
2. Inclusive and extensive consultation with affected stakeholders
3. Consideration of alternative and proportional regulatory models that do not risk unintended harm to existing businesses, workers, students or qualifications

We remain committed to constructive participation in a collaborative and evidence-based process to ensure that any eventual regulatory framework is fair, practical, lawful, and aligned with South Africa's broader employment and skills development priorities.

We hereby request acknowledgement of receipt of this letter and welcome the opportunity for further engagement.

Respectfully submitted,

Johan Roos

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On behalf of Solidarity and affected industry stakeholders

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