

Raymond R. J. Peng  
Chinese Herbalist Acupuncture & Foot Massage Centre

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Ms Debra Gillick  
Executive Officer,  
Chinese Medicine Board of Australia  
AHPRA  
GPO Box 9958, Melbourne, 3001

Email: [chinesemedicineconsultation@ahpra.gov.au](mailto:chinesemedicineconsultation@ahpra.gov.au)  
Subject: Mandatory registration standards

Dear Ms Gillick

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**Re: Submission on the Mandatory Registration Standards and the Grandparenting Arrangements**

I am writing in regard to the above matter. I would like to thank the Chinese Medicine Board of Australia (the Board) for the opportunity to express my opinion on the mandatory registration standards and grandparenting arrangements.

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I agree with and support the proposed mandatory registration standards and grandparenting arrangements in particular on "*The exemption arrangement for grandparented applicants*". I appreciate the consideration given by the Board on specific needs in making flexible arrangement on English requirements due to historical and uniqueness of the development of Chinese Medicine in Australia. I support the overall language requirements for post-grandparenting requirements but believe IELTS 6.5 or equivalent level should be adequate.

I also agree with and support the proposed Proof of Practice and Competence Applicants for a cupuncturist, C hinese he rbal pr actitioner a nd C hinese h erbal dispenser unde r t he h eading o f “Grandparenting registration s tandard”. T hose evidence requirements l isted on S chedule 1 a nd S chedule 2 are reasonable and acceptable.

I acknowledge that r egistration s hould not be considered a s an a ward or honour to anyone on t he basis of t heir contribution to t he development of C hinese medicine in Australia. Indeed, t he ultimate aim of statutory regulation for t he C hinese medicine profession is to protect t he public by setting up criteria so t hat only t hose practitioners w ho c ould demonstrate t heir kno wledge, competence and skills o f C hinese medicine are eligible for registration. Therefore, I believe t hat t he proposed mandatory r egistration s tandards a nd grandparenting a rrangements have met t he requirements.

I further s uggest t hat t he B oard s hould clearly define t he s cope of Acupuncture a nd C hinese he rbal m edicine on i ts r egistration s tandards. I strongly believe t hose w ho practise Japanese acupuncture, Myofascial dry needling, Ayurvedic (Indian) acupuncture, Korean oriental medicine, Japanese (Kampo) medicine, Natural medicine or herbal medicine s hould not be eligible to apply for registration of C hinese medicine as onl y **C hinese medicine profession** is i ncluded i n t he N ational Registration and Accreditation Scheme (NRAS).

In conclusion, t he proposed registration standards are well-designed, t hrough and balance t he need for t he protection of t he public a nd legitimacy of t he C hinese medicine practitioners w ho hold appropriate Australian a nd/or overseas qualifications or demonstrated t hemselves w ith competence of practice.

I hope t he Board will consider my suggestions.

Yours sincerely

Raymond R. J. Peng