



Chinese Medicine Industry Council of Australia Ltd

澳大利亞中藥行業聯合會

ABN 83 140 585 342

Suite 604, 309 Pitt Street, Sydney, NSW 2000 [www.cmic-us.org.au](http://www.cmic-us.org.au)

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Chinese medicine board of Australia

AHPRA

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***RE: Submission on the Draft Guidelines for safe Chinese herbal medicine practice***

Dear Ms Debra Gillick and CMBA Board members

Following our submission on 13 Feb 2014 on the preliminary consultation for the subject matter, on behalf of the members of CMIC, I would like to submit our comments and suggestions again for the proposed guidelines.

We appreciate and value CMBA's initiative for developing a guideline to promote the safe practice of Chinese herbal medicine in Australia, however, the existing industrial practice together with its safety history record, the majority of educational background for the registered Chinese medicine practitioners under the Grand-parenting scheme and Australian multi-cultural circumstances should all be taken into account.

As a whole, some of the critical proposals are far beyond the expectation of the profession and neither practical nor necessary for the safety concerns, and some may potentially cause extra confusion and impose unnecessary burdens to registered Chinese medicine practitioners and their business. The most important concerns are outlined as below:

1. We DO NOT agree that these guidelines apply to ALL Chinese herbal medicines prescribed and /or dispensed by Chinese medicine practitioners. It should apply to "extemporaneous" Chinese herbal medicines (including raw herbs and granules) only. For manufactured and listed medicines, the TGA has a comprehensive guidelines in place and no dual regulator is required or necessary;

In addition, we DO NOT agree that this guideline DOES NOT apply to herbal retailers who sell Chinese herbal products. This is because those Chinese herbal products are a broader term which may include Chinese herbal medicines and extemporaneous medicines preparation. In this case, the Chinese herbal products retailers could freely "prepare or make up" the herbal medicines outside the guidelines and, as in turn the public safety could not be efficiently protected.



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2. TGA nomenclature by using botanical names for manufactured medicine should not apply to Chinese medicine practitioners' practice. It is totally a different industry and profession with different identification mechanism.

We suggest and support either one of Chinese characters, Pinyin, or pharmaceutical names should be used in writing prescription depending on their patient's need, and encourage those who only writing Chinese characters to have a Pinyin-learning plan in place to provide Pinyin translation where patient or any third party required. Botanical names should be an option or additional use when confusions may occur.

3. We DO NOT agree that herbs should be labelled according to their botanical names. It is beyond the capacity of Chinese medicine practitioner's profession and in addition, it is not in line with international practice where Chinese medicine practice is also regulated.

The labelling content for dispensing should be greatly simplified. We neither believes nor supports that are necessary for dispensers to write/label each of herbal names again on the packs after dispensing. **The alternative and simple way is to attach a copy of their signed prescription based on which they dispensed onto the whole pack of multi dose of herbs after dispensing.**

In conclusion, it is good to develop a comprehensive guideline for the whole industry - not only for the registered Chinese medicine practitioners. However, it may be too premature or unnecessary to implement some practice and concept that the pharmacist does because of the fact of different level of risks associated under the Australian Therapeutic Goods Act 1989.

There will be a great impact anticipated on practitioners and their business if the proposal fully implemented without being overhauled, particularly, for nomenclature and label content required for dispensing and writing prescriptions. Further information and rationales will be presented and discussed on the upcoming meeting scheduled on 28 July 2014 in Sydney.

I look forward to meeting you soon.

Sincerely your,

Max Ma, President  
For and on behalf of CMIC