

## Consultation on draft guidelines for safe Chinese herbal medicine practice

28 May 2014

### Responses to consultation questions

Please provide your feedback as a Word document (not PDF) by email to [chinesemedicineconsultation@ahpra.gov.au](mailto:chinesemedicineconsultation@ahpra.gov.au) by close of business on Wednesday, 23 July 2014.

#### Stakeholder Details

If you wish to include background information about your organisation please provide this as a separate word document (not PDF).

<b>Practitioner's name</b>
Cathy Fu
<b>Contact information</b> (please include contact person's name and email address)

#### Your responses to consultation questions

<p><b>Guidelines for safe Chinese herbal medicine practice</b></p> <p><i>Please provide your responses to any or all questions in the blank boxes below</i></p>
<p>1. Do you agree that these guidelines apply to all medicines prescribed and/or dispensed by Chinese medicine practitioners?</p> <p>No, I do not agree on. I suggest to use with Pinyin and Chinese characters, and with the pharmaceutical name or botanical name in addition only under the circumstances of different herbs with same pinyin, but different Chinese characters.</p>
<p>2. TGA nomenclature guidelines require the botanical name to be used for herbal products in manufactured medicines. Pinyin and/or Chinese characters are more commonly used for Chinese herbal medicine prescription writing and dispensing. The use of Chinese characters alone makes it difficult for patients and other health practitioners to understand what medicine the patient is taking. For Chinese herbal medicine prescription writing, do you agree that pinyin or the pharmaceutical name should be used as an alternative to the botanical name, with the addition of Chinese characters where necessary?</p> <p>Is this guideline practical to implement?</p> <p>If you disagree, what alternatives do you suggest?</p> <p>I agree that pinyin with the addition of Chinese characters should be used at all times as an alternative to the pharmaceutical name and the botanical name. However, if this guideline is used as it is without amendment, it is impossible to implement because of the high percentage of registered Chinese medicine practitioners and Chinese Medicine dispensers with language conditioned registration. It is unfair to</p>

accept the language conditioned registration before, later then enforce any guidelines contradict to the conditions.

Prescriptions and labelling should be in consistence with Pinyin and Chinese characters at all times, and with the pharmaceutical name or botanical name in addition only under the circumstances of different herbs with same pinyin, and different Chinese characters.

3. Zhao et al (2006) identified that up to 27 per cent of Chinese herbs are sourced from multiple species, making it impossible to accurately identify the species used if the herb is identified only by pinyin, Chinese characters or pharmaceutical name. Best practice is to label herbs supplied to a patient by the botanical name to allow for accurate reference to drug-herb interaction databases, accurate tracking of potential adverse events and the informed use of evidence from pharmacological research.

Do you agree that herbs should be labelled according to their botanical name?

If not what alternative do you recommend to address these safety issues and remove ambiguity in labelling?

No, I do not agree in using botanical names in labelling all herbs as it is not a practical practice and does not make sense. Any draft guidelines should have a wide related variety and extended academic references.

According to the question, 27% of Chinese herbs are sourced from multiple species, instead of finding ways to overcome the possible ambiguity of the 27%, the guideline is expanding the issue three folds (to 73%) which cause more confusions and chaos.

Chinese name	Pinyin name	Common Name	Pharmaceutical (Latinised) name	Genus	Botanical name (Genus and species)	Source species in Chinese
百合 (1)	Baihe	Lily Bulb	Lilii Bulbus	<i>Lilium</i>	<i>Lilium brownii</i> <i>var. viridulum</i>	百合
百合 (2) 卷丹	<del>Baihe</del> Juan Dan	Lily Bulb	Lilii Bulbus	<i>Lilium</i>	<i>Lilium lancifolium</i>	卷丹
百合 (3) 细叶百合	<del>Baihe</del> XiYe Baihe.	Lily Bulb	Lilii Bulbus	<i>Lilium</i>	<i>Lilium pumilum</i>	细叶百合

Prescriptions and labelling should be in consistence with Pinyin and Chinese characters at all times, and with the pharmaceutical name or botanical name in addition only under the circumstances of different herbs with same pinyin, and different Chinese characters.

It is proposed that an authority on the authentication of CMM be established, as a physical institution and/or as an electronic database.

4. Are the labelling requirements practical to implement?

The draft, as it is, is unjust and not practical. It will cause more confusions at clinical practice and distract practitioners' attention and time from patients which contradict to both the profession's and CMBA's mission of protecting public safety.

5. Is the required information for prescriptions appropriate?

no

6. Do you agree with the circumstances in which a medicine may be supplied for self-medication?

Yes

7. Do you agree with the limited role of dispensary assistants as outlined in section 5 of the guidelines?

Yes

8. Are there any additional requirements which should apply to the management of a Chinese herbal dispensary?

Yes

9. Does the sample label and prescription assist in understanding the requirements set out in the guidelines? Should any other examples be used?

The sample is a good way to help in understanding the requirements. (Yes.) The Board should give as many samples as possible for all other guideline to avoid any misunderstanding and misinterpreting of the worded guidelines. A good example is CPD guideline with a very clear CPD portfolio sample.
<b>10. Taken as a whole, are the guidelines practical to implement and sufficient for safe practice?</b>
No
<b>11. Is the content flow and structure of the guideline helpful, clear, relevant and workable?</b>
No, the content of the draft guideline is not helpful and unclear due to following: 1/ The example used in in appendix 5 is inappropriate (please refer to question 3) 2/ In question 3 “Zhao et al (2006) identified that up to 27 per cent of Chinese herbs are sourced from multiple species, making it impossible to accurately identify the species used if the herb is identified only by pinyin, Chinese characters or pharmaceutical name.” The reference should be attached for submission reference, as it is very hard to get the full version of the article online. 3/ In option 3, the draft stated “The experience of the CMBRV was that approximately 15 per cent of complaints involved herbal practice issues.” The original of the data should be attached and made easier for practitioners and public to assess for general justification.
<b>12. Is there any content that needs to be changed or deleted?</b>
Yes, as stated per above questions.
<b>13. Is there anything missing that needs to be added?</b>
Yes, as stated per above questions.
<b>14. Do you agree with the proposed 12-month transition period and if so is this period adequate?</b>
Before asking individual practitioner if the proposed 12-month transition period is adequate, Chinese Medicine Board of Australia should ask all Australian Chinese Medicine universities and Schools with approved course if 12 month transition is adequate for them to abolish the use of Pinyin in all the herbal related courses, as all sound and logical minds would agree that it is of course inadequate.
<b>15. Should the review period for the guidelines be two, three or five years?</b>
All reviews should be in consistence with other guideline review, ie 3 years.
<b>16. Do you have any other comments on the draft guideline?</b>
By asking only the small population of the law abiding registered Chinese medicine practitioners to comply with the sky high new labelling guideline for protecting public safety without putting any Chinese herbal medicine regulation in place, clearly stating only Chinese Medicine practitioners with proper educational and training background are legitimate prescribers/dispensers of Chinese herbal medicine, is unjust and an act of putting the cart in front of the horse .  Public safety is always at very big risk before a regulation is in place restricting the usage of Chinese herbal medicine by other unregulated professionals such as naturopath and rhizotomist, and even western doctors, dentist and pharmacists, massage therapists with limited or without any proper Chinese herbal medicine education and training background.  In attachment B, second Board assessment in the matter of “the proposal would result in unnecessary restriction of competition among health practitioners”; from my opinion is definitely YES, that the implementation of the original draft guideline would resulted in unnecessary restrictions of competition, not among the Chinese medicine profession, but with other professions with unregulated use of Chinese herbal medicine. Law abiding regulated Chinese medicine practitioners will be discriminated in the keen competition with other unregulated professions.

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