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Emailed to: [chinesemedicineconsultation@ahpra.gov.au](mailto:chinesemedicineconsultation@ahpra.gov.au)  
Attn: Debra Gillick

Dear Debra,

### **Guidelines for safe Chinese herbal medicine practice**

Thank you for the opportunity to provide feedback on these draft Guidelines. My apologies for the delayed submission. I limit my feedback to overall comments.

Firstly, I wish to congratulate the Board on an outstanding and thorough set of guidelines that I am sure will assist safe delivery of Chinese herbal medicine (CHM) in Australia.

I agree with the label inclusions listed on pages 11 and 12. I would however, improve the exemplar labels that have been provided. Those on pages 23 and 24 do not quite make sense in how they comply with the document recommendations. Listing potential interactions (page 13) will be a challenge for most CM practitioners, especially without current data at hand. Overall, whilst many of these proposed labelling safeguards are critical and important to implement, there will be significant resistance from the community unless the Board facilitates this change process. My recommendation is that this is done through the provision of bilingual labelling software by an independent third party. This will require a software development period and of course, training and support for the inclusion of hardware and label printers in private practice, just as has occurred over time in pharmacy. This is no easy or cost free transition. In fact, PCs were provided free of charge on general practitioner desks when trying to get them to complete electronic health records for patients. A similar process may have to be considered to ensure the transition and appropriate labelling of Chinese herbal formulas. Even then, many personnel without IT comfort will be resistant to this change.

Finally, I recommend the period of implementation is extended, as the recommendations will be challenging to adopt for many to CHM practitioners within the proposed 12 months timeframe. I recommend the Board facilitate the transition by ensuring the availability of relevant bilingual labelling software. I am comfortable with a three year review period.

Congratulations again on an outstanding document.

Yours Sincerely,



Professor Alan Bensoussan  
Director

19 August 2014