

Organisation response to the Chinese Medicine Board of Australia public consultation on the revised Guidelines for safe Chinese herbal medicine practice

**Response from Australian Acupuncture and Chinese Medicine Association**

(Note: All responses have been reproduced as provided and have not been edited or otherwise altered.)

**Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?**

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

None apparent

**Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant?**

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

Yes, they are helpful, clear and relevant and the recommended changes to terminology such as medicinal ingredients rather than herbs make the guidelines more contemporary and in keeping with being a registered allied health profession

**Question Three: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?**

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Four: Taken as a whole, are the guidelines practical to implement and sufficient for safe prescription writing, labelling and dispensing of Chinese herbal medicines?**

Response provided to the question: Taken as a whole, are the guidelines practical to implement and sufficient for safe prescription writing, labelling and dispensing of Chinese herbal medicine?

Yes

**Question Five: The Board is proposing a five-year review period of the guidelines. Do you agree?**

Response provided to the question: The Board is proposing a five-year review period of the guidelines. Do you agree?

Yes, this would be an appropriate time frame as amendments could always be added earlier if necessary

**Question Six: Do you have any other comments?**

Response provided to the question: Do you have any other comments?

Reiterating that the changes make the document contemporary and in keeping with being a registered allied health profession. Not within the scope of the CMBA but rather the TGA- an added layer to public safety would be suppliers of Chinese herbal products noting the batch number and expiry date of manufactured/patent herbal formulas they sell and the practitioner to whom they have sold the product. This would be another avenue of contact in case of a product recall.