

28 June 2019

Executive Officer, Medical
Australian Health Practitioner Regulation Agency

By email to: medboardconsultation@ahpra.gov.au

Dear Executive Officer

Re: Public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) is the principal organisation representing the medical speciality of psychiatry in Australia and New Zealand and is responsible for training, educating and representing psychiatrists on policy issues. The RANZCP represents more than 6500 members, including more than 4500 qualified psychiatrists, and is guided on policy matters by a range of expert committees including the Committee for Evidence Based Practice. Delivering effective, appropriate and evidence-based care are core concerns for psychiatrists.

The RANZCP welcomes this opportunity to provide feedback on the regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments. It is the RANZCP's view that the current regulations are appropriate and do not require any changes at this time. However, we do agree that strengthened guidelines may provide greater clarity to medical practitioners wishing to practice complementary and unconventional medicine and to their patients. The RANZCP cautions against making any changes to the regulations which may increase the regulatory burden on medical practitioners.

In view of the above the RANZCP supports strengthening the current educational guidance for medical practitioners who practice complementary and unconventional medicine. At present the proposed definition of complementary and unconventional medicine and emerging treatments is very broad and may stifle the ongoing development of treatments. The RANZCP also affirms that emerging treatments, which are conducted in an appropriately supervised and safe manner, should not be categorised in the same field as unconventional and complementary medicines, as this may discourage innovation in treatment regimes.

Importantly, medical practitioners must ensure patients give informed consent to any emerging or unconventional treatments. Furthermore, practitioners must always provide sufficient information and divulge any pecuniary or other interests to the patient.

If you would like to discuss any of the issues raised in the submission, please contact [REDACTED]
[REDACTED] Executive Manager, Practice, Policy and Partnerships via [REDACTED]
or by phone on [REDACTED]

Yours faithfully

[REDACTED]
/ Associate Professor John Allan
President

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