

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

Response from Chinese Medicine and Acupuncture Society of Australia (CMASA)

(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?

We, Chinese Medicine & Acupuncture Society of Australia Ltd (CMASA) have carefully considered the impact which the revised Guidelines for Safe Chinese Herbal Medicine Practice (the Guidelines) could have on patients and its Chinese Medicine practitioners.

The new Guidelines change the terms of reference from “herbs” to “medicinal ingredients”, so CMASA is opposing this change.

Reason: The problem that the Chinese medicine profession is now facing is the bastardisation of Chinese herbal medicine by the West, where biomedicine becomes reductionist such that Chinese herbs work only because of their active biomedicine constituents/medicinal ingredients, rather than on the foundations “Yin-Yang, Five-Elements, Four Properties and Five Tastes, Ascending and Descending theory” (阴阳五行、四气五味、升降浮沉理论). Chinese herbal medicine never works in such way of “medicinal ingredients” during its thousand’s years of history.

The rationale of traditional Chinese herbal medicine is extremely complex and difficult to analyse. Current levels of the cognition of traditional Chinese herbal medicine are not enough to fully understand and master all “medicinal ingredients”. If it is mandatory to use “medicinal ingredients” to regulate the use of traditional Chinese herbal medicine, then its use will become greatly restricted. Such mandates create an opportunity for “unscientific” criticism from opponents of traditional Chinese herbal medicine, who only base their arguments on “medicinal ingredients”.

Also, the experience of using manufactured Chinese herbal medicines (中成药) is a typical example from the past. Many commonly used manufactured Chinese herbal medicines have been severely restricted by the Therapeutic Goods Administration (TGA) in the past few years because some of the medicinal ingredients do not meet the requirements of the TGA. If the future use of Chinese herbal medicines is to be similarly regulated, as seen with our experience of manufactured Chinese herbal medicines in the past few years, similar restrictions may also occur with other Chinese herbal medicines. Traditional Chinese medicine practitioners will face the dilemma that fewer and fewer Chinese herbal medicines will be available to them due to these future TGA constraints.

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?

No. The new guideline is not clear in the definition of Chinese Herbs. Changing the terminology of Chinese Herbal Medicine to “Medicine” will give a false impression if Chinese Herbal Medicine is the same as “Western Chemical-based medicine”. This will make sure that we are using Herbal terms rather than Western Pharmacology.

we are not seeing the possibility of further streamlining of herbs prescription protocols, to improve practitioner’s efficiency and to reduce the burden of such time consuming requirements that are associated with herbal medicine dispensing as regulated by the Guidelines. We believe that these Guidelines must be more practical to adopt and enforce.

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?

The revised draft Guidelines cover all the necessary aspects for safe Chinese herbal medicine practice.

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, the Guidelines are not only practical to implement and sufficient for safe prescription writing, labelling and dispensing of Chinese herbal medicines; they also protect the public and give enough information to other health practitioners.

But there is confusion in an example of a prescription: “To be divided into three packets”.
The standard dosage of any prescription is for one package’s weight. The custom of dispensing herbs is to write each packet’s weight usage first, then we write how many packets are to be dispensed in total. Not “To be divided into three packets”.

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?

A five-year review period is acceptable, but if an interim review and revision is required, it must be done before the end of the five-year review period.

Question Six: Do you have any other comments?

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

CMASA is asking any decision maker of CMBA who sets future Chinese Medicine regulations or policies to thoroughly understand what really Chinese medicine is, to appreciate the law that governing Chinese medicine, to respect its unique theoretical characteristics of Chinese herbal medicine.
CMBA Board needs to let senior TCM practitioners, including CMASA members, to get involved in the Board's policy-decision making process in the future.
Blindly using the management method of Western medicine to regulate and control the practice of Chinese medicine is to be stopped.
Thanks kindly for your consideration and understanding.