

## Individual responses (R-Z) to the Chinese Medicine Board of Australia public consultation on the revised Safe Chinese herbal medicine guidelines

### Response from Rachael Oi King Lau

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

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"I have read the revised Guidelines for Safe Chinese Herbal Medicine Practice (the Guidelines) over the last few weeks. I am opposing the wording change from "herbs" to "medicinal ingredient".

The Chinese medicine should follow 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.

If it is mandatory to use "medicinal ingredients" to regulate the use of traditional Chinese herbal medicine, then it is not real Chinese Medicine."

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

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

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"The revised draft guidelines cover all necessary aspects for safety Chinese Medicine practice."

Australian Health Practitioner Regulation Agency  
National Boards

GPO Box 9958 Melbourne VIC 3001 [Ahpra.gov.au](http://Ahpra.gov.au) 1300 419 495

Ahpra and the National Boards regulate these registered health professions: Aboriginal and Torres Strait Islander health practice, Chinese medicine, chiropractic, dental, medical, medical radiation practice, midwifery, nursing, occupational therapy, optometry, osteopathy, paramedicine, pharmacy, physiotherapy, podiatry and psychology.

**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?**

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

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

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## Response from Shifu Lu

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"Dear CMBA Board,

My thanks go to the CMBA Board for the opportunity to offer some feedback on ""Guidelines on safe Chinese herbal medicine practice."" . As a registered herbal medicine practitioner in Australia with AHPRA/CMBA for many years, I wish to convey the following important points to you.

According to the new guidelines, the term of ""herbs"" are now becoming to ""medicinal ingredients"" . Having carefully analysed this wording change and it's impact on patients and Chinese Medicine practitioners, I find it concerning and oppose it.

Reason:

1 The Chinese system of herbal medicine has a unique theory and a fundamental framework that it has successfully used over many centuries, if not thousands.

2 A Chinese medicine can't be judged simply by Western medicine and/or biomedicine's standard of ""medicinal ingredients.""

3 It is totally wrong and unacceptable to believe that Chinese herbs work only because of the active biomedicine constituents, and not because of the Yin-Yang, Five-Elements-Theory.

4 It is currently not possible to master all the ingredients of traditional Chinese medicine due to their complexity and difficulty to analyse. We lack the knowledge and skill to fully comprehend all the ingredients of traditional Chinese medicine.

5 The use of traditional Chinese medicine will be greatly restricted in the future if it is mandatory to use ""medical ingredients/medicinal ingredients"" to regulate its use. This will open the door to ""unscientific"" criticism from opponents who only offer a technical analysis only based on their arguments on ""medicinal ingredient"".

6 The experience of manufactured Chinese medicines (中成药) is a typical example. Many commonly used factory manufactured Chinese medicine in Australia has now been severely restricted by the TGA in the past few years. Simply some of the ""medicinal ingredients"" it contains do not meet the requirements of the TGA. It's a hard lesson to learn from the past.

7 Chinese herbal medicine /Chinese herbs must remain unchanged ( change the proposed ""medicine and medicinal ingredients "" into ""Traditional Chinese herbal medicines"" and "" Chinese herbs"" respectively).

In conclusion, I would like to remind the Board that we should all respect the unique theoretical characteristics of Chinese medicine when setting policy. We shouldn't blindly follow the management methodologies of Western medicine when managing and policing the practice of Chinese herbal medicine.

Thanks you kindly for your consideration and understanding."

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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."

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"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".

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

"I am asking any decision maker of CMBA to thoroughly understanding what Chinese medicine is, to appreciate the law that governing the Chinese herbal medicine, to respect the unique theoretical characteristics of Chinese herbal medicine. Any blindly usage the management method of Western medicine to regulate and control the practice of Chinese herbal medicine is to be stopped.

## Response from Terence Sun

(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?

Just wonder if the new policy to restrict the single herb use in the future

### 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?

Not agree, As mentioned above what is the outcome once it go through the revised. It could be harm to the individual raw herb use.

### 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?

Nil

### 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?

So far the herbs that not safety already have been used in Australia such as Ma Huang . FuZhi etc. if there is no implied to stop use any single raw herbs then it should be fine

### 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?

Agree

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

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

## Response from Tian Zhe Zhu

(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?

No issues or effects. All recommendations are practical and useful.

### 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?

All helpful and clear.

### 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?

None.

### 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?

The guidelines practical and sufficient.

### 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 i agree.

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

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

No.



## Response from Victor Wu

(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?

"I have read the revised Guidelines for Safe Chinese Herbal Medicine Practice (the Guidelines) over the last few weeks. I am opposing the wording change from "herbs" to "medicinal ingredient". The Chinese medicine should follow 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. If it is mandatory to use ""medicinal ingredients"" to regulate the use of traditional Chinese herbal medicine, then it is not real Chinese Medicine."

### 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. I 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?

Yes, the guidelines are practical to implement and sufficient for safe prescription writing, labelling, and dispensing of Chinese herbal medicines. It also protects the public and give enough information to the other health practitioners.

### 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?

**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 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?**

I am asking any decision maker of CMBA to thoroughly understanding what Chinese medicine is, to appreciate the law that governing the Chinese herbal medicine, to respect the unique theoretical characteristics of Chinese herbal medicine. Any blindly usage the management method of Western medicine to regulate and control the practice of Chinese herbal medicine is to be stopped.

## Response from Vida Lee Hung-Yin Wang

(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?

"I have read the revised Guidelines for Safe Chinese Herbal Medicine Practice (the Guidelines) over the last few weeks. I am opposing the wording change from "herbs" to "medicinal ingredient".

The Chinese medicine should follow 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.

If it is mandatory to use ""medicinal ingredients"" to regulate the use of traditional Chinese herbal medicine, then it is not real Chinese Medicine."

### 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?

"The draft revised CMBA guidelines have some issues. 1 "Use of alcohol-based rubs"  
Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water.

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate."

### 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 necessary aspects for safety Chinese 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 practical to implement and sufficient for safe prescription writing, labelling, and dispensing of Chinese herbal medicines. It also protects the public and give enough information to the other health practitioners."

**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 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?**

I am asking any decision maker of CMBA to thoroughly understanding what Chinese medicine is, to appreciate the law that governing the Chinese herbal medicine, to respect the unique theoretical characteristics of Chinese herbal medicine. Any blindly usage the management method of Western medicine to regulate and control the practice of Chinese herbal medicine is to be stopped.

## Response from Wei hua sun

(Note: All responses have been reproduced as provided and have not been edited or otherwise altered. This response has been translated by the Board using Google translate.)

### 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?

针灸最新修正安全指南，存在不少影响我们执业的实际问题。例如：针灸操作时需要穿短袖衣服等规定。

Google translate:

The latest revision of the safety guidelines for acupuncture and moxibustion has many practical problems that affect our practice. For example, it is required to wear short-sleeved clothes during acupuncture operations.

### 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?

中草药部分将Herbs一词改成了Medicinal Lngredients药用化学成分等。

Google translate:

The Chinese herbal medicine section changed the word Herbs to Medicinal Ingredients and other medicinal chemical components.

### 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?

这些重要改变，有部分对我们的执业产生即时影响。

Google translate:

Some of these important changes had an immediate impact on our 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?**

部分会在今后逐渐影响到我们中医行业，存在一定的危险性。

Google translation:

Some of them will gradually affect our Chinese medicine industry in the future, and there is a certain danger.

**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?**

如果不加以改正，中医在澳大利亚的生存和发展都会受到威胁！

Google translation:

If it is not corrected, the survival and development of Chinese medicine in Australia will be threatened!

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

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

没有

Google translation:

No

## Response from Xiang Xin Huang

(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?

"I have read the revised Guidelines for Safe Chinese Herbal Medicine Practice (the Guidelines) over the last few weeks. I am opposing the wording change from "herbs" to "medicinal ingredient".

The Chinese medicine should follow 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.

If it is mandatory to use ""medicinal ingredients"" to regulate the use of traditional Chinese herbal medicine, then it is not real Chinese Medicine."

### 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. I 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 necessary aspects for safety Chinese 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 practical to implement and sufficient for safe prescription writing, labelling, and dispensing of Chinese herbal medicines. It also protects the public and give enough information to the other health practitioners."

**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?

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

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

"I am asking any decision maker of CMBA to thoroughly understanding what Chinese medicine is, to appreciate the law that governing the Chinese herbal medicine, to respect the unique theoretical characteristics of Chinese herbal medicine. Any blindly usage the management method of Western medicine to regulate and control the practice of Chinese herbal medicine is to be stopped.



## Response from Xiao Ping Yu

(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?

"I have read the revised Guidelines for Safe Chinese Herbal Medicine Practice (the Guidelines) over the last few weeks. I am opposing the wording change from "herbs" to "medicinal ingredient".

The Chinese medicine should follow 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.

If it is mandatory to use ""medicinal ingredients"" to regulate the use of traditional Chinese herbal medicine, then it is not real Chinese Medicine."

### 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. I 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 necessary aspects for safety Chinese 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 practical to implement and sufficient for safe prescription writing, labelling, and dispensing of Chinese herbal medicines. It also protects the public and give enough information to the other health practitioners.

**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 I agree.

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

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

I hope that every decision-maker of CMBA has a thorough understanding of what Chinese medicine is, and understands the characteristics of Chinese herbal medicine and the unique theoretical characteristics of Chinese herbal medicine. Any use of western medicine management methods to regulate and control the practice of Chinese herbal medicine is not conducive to the development of Chinese medicine in Australia

## Response from XiaoDan Huang

(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?

"I have read the revised Guidelines for Safe Chinese Herbal Medicine Practice (the Guidelines) over the last few weeks. I am opposing the wording change from "herbs" to "medicinal ingredient".

The Chinese medicine should follow 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.

If it is mandatory to use ""medicinal ingredients"" to regulate the use of traditional Chinese herbal medicine, then it is not real Chinese Medicine."

### 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. I 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 necessary aspects for safety Chinese 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 practical to implement and sufficient for safe prescription writing, labelling, and dispensing of Chinese herbal medicines. It also protects the public and give enough information to the other health practitioners."

**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 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?**

"I am asking any decision maker of CMBA to thoroughly understanding what Chinese medicine is, to appreciate the law that governing the Chinese herbal medicine, to respect the unique theoretical characteristics of Chinese herbal medicine. Any blindly usage the management method of Western medicine to regulate and control the practice of Chinese herbal medicine is to be stopped.

## Response from Xiaowen LI

(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?

"I have read the revised Guidelines for Safe Chinese Herbal Medicine Practice (the Guidelines) over the last few weeks. I am opposing the wording change from "herbs" to "medicinal ingredient".

The Chinese medicine should follow 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.

If it is mandatory to use ""medicinal ingredients"" to regulate the use of traditional Chinese herbal medicine, then it is not real Chinese Medicine."

### 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. I 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 necessary aspects for safety Chinese 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 practical to implement and sufficient for safe prescription writing, labelling, and dispensing of Chinese herbal medicines. It also protects the public and give enough information to the other health practitioners."

**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 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?**

"I am asking any decision maker of CMBA to thoroughly understanding what Chinese medicine is, to appreciate the law that governing the Chinese herbal medicine, to respect the unique theoretical characteristics of Chinese herbal medicine. Any blindly usage the management method of Western medicine to regulate and control the practice of Chinese herbal medicine is to be stopped.

## Response from Ye Lu

(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?

No

### 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

### 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

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

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

No

## Response from Yong Di Tu

(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?

"Herbs has been used for thousands of years and it will be used for tens of thousands of years"

### 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?

"Medicinal ingredients should be called on those chemically extracted and concentrated products like artemisinin."

### 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?

"Ma huang is a very important herb to treat Lung problem and should be allowed for qualified practitioner, the amount can be registered "

### 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?

Ok

### 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?

Good



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

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

Thanks for your work

## Response from Yong Lei

(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?

"I have read the revised Guidelines for Safe Chinese Herbal Medicine Practice (the Guidelines) over the last few weeks. I am opposing the wording change from "herbs" to "medicinal ingredient".

The Chinese medicine should follow 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.

If it is mandatory to use ""medicinal ingredients"" to regulate the use of traditional Chinese herbal medicine, then it is not real Chinese Medicine."

### 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. I 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?

### 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?

NO

**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, five years is reasonable

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

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

CMBA should provide a Chinese version for the revised guideline. Please Do not forget you are playing with Chinese Medicine.

## Response from Yu Hsu

(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?

Current Guideline provides clear instructions for my professional practice. It ensures the safety, security, and right for both my clients and for myself I am very satisfied with current guideline

### 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?

I understand the revised guideline aiming to improve our current practice environment; However, I strongly believe that the term "medical ingredients" for replacing the term "herbs" is inappropriate. Because it may be very confusing when comparing to Western medical ingredients. Therefore, I would like to request board to utilised other term instead of "medical ingredients"

### 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?

N/A

### 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, me and my clients feel safe and secure with the clear label for Chinese medicine formulas.

### 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, the practical guideline should adapt the latest research and provides recommendations for best practice.

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

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

Big thank you to the chinese medicine board for all the time and effort spent in creating better practice environment for all practitioners and clients.

## Response from Yu Zheng

(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?

"I have read the revised Guidelines for Safe Chinese Herbal Medicine Practice (the Guidelines) over the last few weeks. I am opposing the wording change from "herbs" to "medicinal ingredient".

The Chinese medicine should follow 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.

If it is mandatory to use ""medicinal ingredients"" to regulate the use of traditional Chinese herbal medicine, then it is not real Chinese Medicine."

### 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. I 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 necessary aspects for safety Chinese 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 practical to implement and sufficient for safe prescription writing, labelling, and dispensing of Chinese herbal medicines. It also protects the public and give enough information to the other health practitioners."

**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 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?**

"I am asking any decision maker of CMBA to thoroughly understanding what Chinese medicine is, to appreciate the law that governing the Chinese herbal medicine, to respect the unique theoretical characteristics of Chinese herbal medicine. Any blindly usage the management method of Western medicine to regulate and control the practice of Chinese herbal medicine is to be stopped.

## Response from Yuan Chen

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### 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?

The term, medicinal ingredients when used to refer to herbs is ambiguous and more sound like Western medicine or pharmaceutical compounds of Western medicines. Therefore, it is not accurate and it is wrong for medicinal ingredients to be used to replace the term herbs and it can't represent the true meaning of herbs which are carefully applied in practice based on the sophisticated TCM theory and after going through a thorough diagnostic process with clients. Although each herb contains medicinal ingredients with associated pharmaceutical compounds that can be identified through modern pharmacological studies, herbs by no means are equivalent to medicinal ingredients and can't be simply referred to as medicinal ingredients on a whole. The proposal for medicinal ingredients to replace herbs is unjustified, unwise and is an unnecessary item of revision for the current guideline. The proposed guideline indicates the term medicinal ingredients pertain to a broader meaning than herbs, but the actual fact is that herbs and the complex chemical compounds of each herb are much broader and more complex than a single or a series of medicinal ingredients when used to refer to a single herb. I strongly oppose the proposed change for medicinal ingredients to replace the term herb.

### 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?

"The proposed guidelines are clear and relevant except for the plan to change the term herb to medicinal ingredients. Herbs mean herbs which are different from medicinal ingredients which can include many other products such as Western Medications, vitamins, etc.

The proposed guideline describes ""make a clearer distinction between individualised formulations prepared from raw or prepared medicinal ingredients and those prepared from extracts such as granules"".

What specifically does this proposal imply? Does it mean that practitioners need to specify/indicate on the prescription as to which form of herbs has been prescribed for the patient, whether being the raw herbs, manufactured patent herbs, or the granulated herbs? and provide relevant instructions to clients on preparing and taking the prescribed herbs? if this is the proposal, I can confirm that such practice has been implemented in the current guideline as far as I am aware of, and at least I am implementing this in my daily herbal medicine practice at all times. If this is not what I described, then what does it imply? please provide an example or elaborate it further to make it clear. "

### 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?



**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?**

The guidelines will ensure safe Chinese Herbal Medicine practice except for the proposed change from herbs to medicinal ingredients which will not work out and will be very confusing when used to describe herbs. Please consider abandoning this proposed change.

**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?**

I agree with the current reviewing regime, perhaps a longer reviewing interval such as every 10 years would be sufficient unless there are substantial changes to the use of herbs in Chinese Herbal Medicine practice.

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

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

## Response from Yue Hua Sun

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"I have read the revised Guidelines for Safe Chinese Herbal Medicine Practice (the Guidelines) over the last few weeks. I am opposing the wording change from "herbs" to "medicinal ingredient".

The Chinese medicine should follow 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.

If it is mandatory to use ""medicinal ingredients"" to regulate the use of traditional Chinese herbal medicine, then it is not real Chinese Medicine."

### 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. I believe that these Guidelines must be more practical to adopt and enforce.

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The revised draft guidelines cover all necessary aspects for safety Chinese Medicine practice.

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**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 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?**

"I am asking any decision maker of CMBA to thoroughly understanding what Chinese medicine is, to appreciate the law that governing the Chinese herbal medicine, to respect the unique theoretical characteristics of Chinese herbal medicine. Any blindly usage the management method of Western medicine to regulate and control the practice of Chinese herbal medicine is to be stopped.

## Response from Yueping Li

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## Response from Yuet Lung Kwok

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## Response from Yun Chen

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The Chinese medicine should follow 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.

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## Response from Yuru Hou

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The Chinese medicine should follow 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.

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## Response from Yvonne Yao

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### 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?**

According to the new guidelines, the term of "herbs" are now becoming to "medicinal ingredients". I oppose to this change. Due to the lack of the definition of these two terms, there is no way to evaluate the scope change and impact. Suggests to keep the original term "herbs" and add "medicinal ingredients" as the additional scope.

### 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, it is unclear. There is no detail explanation of critical terminology change, no clear scope definition of each term, and no detail impact evaluated

### 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 scope of "herbs" and the scope of "medicinal ingredients" are missing. Why the change is proposed, what is the supporting evidence to make this change?

### 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?**

Please involve CM practitioners and patients at the early stage of drafting such kind of guideline. The current process only collects feedback at very late stage from the focus groups, which causes numerous issues in the future implementation.

**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?**

No, the guideline is immature and lacks of sufficient participation of focus groups such as CM practitioners and patients.It should be reviewed annually and remove any mistake in.a timely manners.

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

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

suggest to create a scheme how to support CM practitioners to contributing to public health.

## Response from Zhankui Wang

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## Response from Zhanlin Feng

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The Chinese medicine should follow 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.

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## Response from Zhao Chen

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"“herb ” “herbal” are the words I want to use.  
Not the medical ingredients."

### 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?

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Five years is too long

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

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## Response from Zhen Ye Rong

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"According to the new guidelines, the term of ""herbs"" are now becoming to ""medicinal ingredients"". Having carefully analysed this wording change and it's impact on patients and Chinese Medicine practitioners, I find it concerning and oppose it.

Reason:

1 The Chinese system of herbal medicine has a unique theory and a fundamental framework that it has successfully used over many centuries, if not thousands.

2 A Chinese medicine can't be judged simply by Western medicine and/or biomedicine's standard of ""medicinal ingredients.""

3 It is totally wrong and unacceptable to believe that Chinese herbs work only because of the active biomedicine constituents, and not because of the Yin-Yang, Five-Elements-Theory.

4 It is currently not possible to master all the ingredients of traditional Chinese medicine due to their complexity and difficulty to analyse. We lack the knowledge and skill to fully comprehend all the ingredients of traditional Chinese medicine.

5 The use of traditional Chinese medicine will be greatly restricted in the future if it is mandatory to use ""medical ingredients/medicinal ingredients"" to regulate its use. This will open the door to ""unscientific"" criticism from opponents who only offer a technical analysis only based on their arguments on ""medicinal ingredient"".

6 The experience of manufactured Chinese medicines (中成药) is a typical example. Many commonly used factory manufactured Chinese medicine in Australia has now been severely restricted by the TGA in the past few years. Simply some of the ""medicinal ingredients"" it contains do not meet the requirements of the TGA. It's a hard lesson to learn from the past.

### 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?

### 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?

**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?

**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?

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

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

"In conclusion, I would like to remind the Board that we should all respect the unique theoretical characteristics of Chinese medicine when setting policy. We shouldn't blindly follow the management methodologies of Western medicine when managing and policing the practice of Chinese herbal medicine.

Thanks you kindly for your consideration and understanding."