



The Medical Board of Australia (MBA) has released a [public consultation paper](#) to seek feedback on options for clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments.

Why is this consultation occurring?

The MBA state that an additional guidance document may be required for medical practitioners to support safe practice and ensure safeguards for patients, due to concerns raised by stakeholders about this area of practice.

Current status:

The MBA are proposing the following definition for consultation purposes: “Complementary and unconventional medicine and emerging treatments include any assessment, diagnostic technique or procedure, diagnosis, practice,³ medicine, therapy or treatment that is not usually considered to be part of conventional medicine, whether used in addition to, or instead of, conventional medicine. This includes unconventional use of approved medical devices and therapies”.

Complementary Medicines Australia Position

The CMA does not support the Medical Board of Australia developing a separate guideline for medical practitioners who provide complementary medicine advice (CM). The rationale of grouping CMs, a system based in evidence and a valid integrative form of healthcare with ‘unconventional medicine’ and ‘emerging treatments’ is incongruous. The current ‘Good Medical Practice Code of Conduct’ should remain the principle basis to support safe practices and safeguards to patients.

1. Complementary medicines¹ regulated by the Therapeutic Goods Administration (TGA) are low-risk under the therapeutic goods regulatory framework and must be articulated separately from treatments or other alternative therapies.
2. CMA supports the World Health Organisations’ (WHO) direction which is to “*ensure consumers of traditional and complementary medicines (T&CM) can make informed choices about self-health care. A key indicator of this being “improved communication between conventional medicine practitioners and their patients about T&CM use”*².

¹ Complementary medicines, for the purpose of this consultation, should be defined as, medicinal products containing such ingredients as certain herbs, vitamins and minerals, nutritional supplements, homoeopathic medicines and aromatherapy products and are regulated as medicines by the Therapeutic Goods Administration (TGA) under the [Therapeutic Goods Act 1989](#)

² *World Health Organisation Traditional Medicine Strategy 2014-2023*



3. CMA supports the Medical Board of Australia's current 'Good Medical Practice Code of Conduct' for Doctors in Australia as the basis for providing good patient care, including when providing complementary medicine related advice to patients.
4. The code appropriately highlights that there are many ways to practise medicine in Australia, reflecting a linguistically and culturally diverse society, of which the core tasks of medicine are caring for people who are unwell and seeking to keep people well.
5. The consultation discussion document groups complementary medicines as not "within the domains of conventional medicine", however, with more than two thirds of the Australian population using these medicines as part of their self-care³, they make up an integral and complementing aspect of the overall health picture. CMA supports that complementary medicines are taken on the advice of a healthcare professional and, along with other medicines, monitored regularly.
6. The current code provides suitable guidance around areas of concern that the consultation paper seeks to address, including:
 - Decisions about access to medical care** - supports that Doctors decisions about patients' access to medical care needs to be free from bias and discrimination.
 - 3.2 Doctor-patient Partnership** - high standards of professional conduct involve encouraging and supporting patients in caring for themselves and managing their health. Encouraging and supporting patients to be well informed about their health and to use this information wisely when they are making decisions.
 - 3.3 Effective communication** - an important part of the doctor–patient relationship involves listening to patients, asking for and respecting their views about their health, and responding to their concerns and preferences. This includes, encouraging patients to talk about their condition and how they are currently managing it, including any other health advice they have received, any prescriptions or other medication they have been prescribed and any other conventional, alternative or complementary therapies they are using. Other relevant sections include: 8.11 conflict of interest, 4.3 Delegation, referral and handover for areas such as practising outside area of expertise

Recommendation: That the Medical Board of Australia maintains the current 'Good Medical Practice Code of Conduct' for Doctors in Australia as a basis for providing good patient care, including when providing complementary medicine advice to patients.

Public consultation on complementary and unconventional medicine and emerging treatments to the medboardconsultation@ahpra.gov.au closes, **12 May 2019**.

³ A survey of 1015 Australians by YouGov Galaxy for NPS MedicineWise, July 2018.

NPS Medicinewise, NPS Annual Consumer Surveys: Findings about complementary medicines use, 2018, available at: <http://www.nps.org.au/about-us/what-we-do/our-research/complementary-medicines/nps-consumer-survey-cms-use-findings>