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**From:** [REDACTED]  
**Sent:** Monday, 25 March 2019 2:05 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments

To whom it may concern,

I would like to voice my dissatisfaction, with the proposed policies, to ban complimentary medicines, striping us of our right to choose, and our natural born health care rights!!

It is absolutely outrageous, and despicable, and makes me think the liberal party and APRHA is taking to many pollical contributions from the pharmaceutical industry, who would be the only winner if the policy was to get through.

I am currently fighting cancer, I am using mainstream medical treatments, that were struggling to work, as was the evidence of my regularly tumour marker tests. As soon as I added in IV Vit C therapy, I have witnessed my tumour markers drop dramatically. It is truly helping!!!

This treatment works, which is probably why they are trying to shit it down!!

If this life saving therapy is taken off the market, there will be widespread discord, and disapproval, which I believe will point to massive corruption and collusion.

Please don't take this life saving treatment from me and other desperate patients. This makes no sense, and only benefits the pharmaceutical industry, why else would there be such a massive attack on natural health!!

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 17 April 2019 11:50 AM  
**To:** medboardconsultation  
**Subject:** Public Consultation Paper: Complementary and unconventional medicine and emerging treatments

To:  
[medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

Dear Sir/Madam,

I am emailing in response to the Public Consultation Paper: Complementary and unconventional medicine and emerging treatments, and to lodge my comments and concerns with AHPRA and the MBA.

For over thirty years I have worked as a Registered Nurse, and have worked with many doctors, surgeons and specialists. As a patient I have sought the advice of doctors over my adult life span, for myself and my children. I recall one instance where a GP did not listen to my concerns over my youngest child, and 24 hours later she required hospitalisation. Another GP who condescendingly patted my arm and advised me to go to the gym, when I was unwell with a viral illness. A further GP who expressed his disgust to me, that the requirement stipulated to all doctors at the surgery he worked at, was to spend a maximum of five minutes with each patient. He left that surgery soon thereafter.

To find a good GP is very difficult. And yet I did.

For over thirteen years I have been under the care of a GP who utilises an integrative approach. During this time I have found her to be informed, well read, approachable and professional at all times. I fully credit this doctor with managing my health and well being to the level that it is. I have gladly given her name to many people over the years, and am extremely thankful to have found such a caring, well informed doctor.

When I first saw this doctor I was struggling to walk, sit and stand for any length of time due to a herniated disc L3-4. I was in considerable pain and had sciatica down my left leg. As a result of this injury, I was also unemployed, anxious and depressed. This GP commenced prolotherapy, and within twelve weeks I began to feel an improvement in my symptoms. Over time I was able to return to work, gradually increasing my hours. Now thirteen years on, I am a full-time shift worker.

Some years ago I met a lady who had sustained a workplace back injury, similar in nature to mine. This lady was on a morphine pump, could hardly walk and was deeply depressed. It was a confronting moment for me.

There is no doubt my doctors expertise and care has positively impacted my health and well-being to the level it is. It cannot be understated how my life has been turned around. I have independence and a quality of life that I know I would not have had,

had I followed mainstream medical advice.

Along with this treatment I also am prescribed compounding medications, which have alleviated my menopause symptoms and are stabilising my hypothyroidism and Hashimotos Disease.

In all the years I have been a patient of this doctor, I do not have once instance where I felt concern for the level of care I was receiving. I gladly travel 2.5 hours to keep my appointments, knowing I will receive sound, Evidence-Based advice and care. I have the utmost respect for her, and am relieved to have such a knowledgeable, compassionate and amazing doctor.

In the big picture, we are all patients at some stage during our lives. No matter who we are or what our profession or standing in the community is, health challenges effect all. I, along with the person reading this email and all others, have the right to decide who we want to consult with. Fully accredited health professionals along with AHPRA registered doctors/specialists etc. who offer integrative services for which training has been undertaken, should be allowed to practice unhindered. We are a democratic country, and this surely is one of our democratic rights.

Yours sincerely,



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**From:** [REDACTED]  
**Sent:** Thursday, 27 June 2019 10:19 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

Medical Board of Australia,

I do not agree with the whole idea of proposed regulations. I am happy with my GP for simple treatments within brief consultations, but I want to go further with prevention and a deeper understanding of what I can do for myself and my family. My integrative medicine doctor provides me the time and knowledge to do that. This is how I have managed my families health for years. If I had not sought the help of integrative medicine on my particular health issue after 11 years of seeking several GP's advice to no avail, I would right now be very sick, if not dead. This is not because of GP incompetence, but because of the extra study and research integrative medicine doctors provide. Integrative medicine works and to put regulations on it is simply ignorant and irresponsible and again removing the rights of Australians to manage their health. Failing to listen to the Australian public on this highly important matter is unacceptable. 70% of Australians use integrative or complimentary medicine every year. That should tell you enough. It is what the people want. It is what is working for their health. What's more, integrative medicine is not a "fringe alternative medicine". It is fully qualified doctors with *extra* skills and training. Yet the Medical Board of Australia wants to effectively shut it down? Where is the logic in that? In doing so you will just force people to seek advice from overseas or Dr Google. I cannot help but believe there are hidden agendas here when the government takes more and more rights away from Australians regarding how to manage their health. Little by little wheedling it away. When the Medical Board of Australia includes members of the Friends of Science in Medicine, a political lobby group opposing Complementary Medicine and Integrative Medicine, there is a clear conflict of interest.

For a great country, we are going backwards in a deceitful, greedy and passive controlling manner. This will only be a detriment to the long term health of the Australian population causing future strain on the budget and other resources. Medical Board of Australia, why not work *together* with integrative medicine practitioners? Why not?

Sincerely,  
[REDACTED]  
Australian Citizen

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**From:** [REDACTED]  
**Sent:** Saturday, 11 May 2019 4:54 PM  
**To:** medboardconsultation  
**Subject:** Feedback-MBA consultation paper.

To Whom it May Concern,

I feel greatly outraged, disappointed and saddened that other people feel/ think that they are able to take my rights away as a sane and healthy person, to choose a Doctor of my choice-who happens to practice both traditional and alternative medicines.

I am so happy and blessed in the fact that I know my Doctor will treat me in what is most suitable for me , and, thus far for the conditions presented are:-

- I have suffered from hay fever, resulting in rashes, severe itching, facial swelling and more. I was diagnosed leaky gut and after following a detox diet and alternative medicines I am now free of these symptoms. These symptoms were very debilitating and distressing at the time!
- I also had extreme, challenging issues at work. With my Doctors massive support through the whole ongoing process, I am back at work now and all is well.
- I have had illnesses where I have needed traditional medicines, eg; antibiotics.
- I was advised and given an "anti pneumonia' Injection because of two cases I had earlier. Thus far great results.
- I am taking a troche for hormonal replacement therapy, again great results.
- I am successfully being treated for arthritis, I know this condition will never be eradicated but my pain management is fantastic.

Please don't take my choice of doctor away, it is not always easy to have good doctor, patient relationship, but I feel I have this and much more.

Kind Regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 4 April 2019 10:23 PM  
**To:** medboardconsultation  
**Subject:** My future rights

Regarding the public consultation on clearer  
regulation of medical practitioners who provide complementary and  
unconventional medicine and emerging treatments

As an Australian  
citizen I feel it's important that I have the freedom of choice in the  
type of medical care that I use to address my chronic health issues.

I have been suffering from : menopause symptoms and depression and weight gain.

Conventional medical doctors  
have not been able to successfully treat my condition and bring me to a  
satisfactory level of health.

Pharmaceuticals and the use of  
conventional methods simply did not work (and in some instances also delivered  
unwanted side-effects in my case) and, seemed to waste Medicare funds and  
resources.

It was only when I saw an  
integrative medical doctor who included lifestyle change, diet and supplements  
of vitamins and minerals to address my problems that my condition began to  
improve.

If I cannot see an integrative  
doctor, or the Doctor is restricted in what he or she is able to prescribe for  
me, I feel that my health will deteriorate and have a continuing impact on my  
family, my work, and my wellbeing.

Concerned,

Name:

[REDACTED]

Date: 4th April 2019

Occupation: Invigilator

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**From:** [REDACTED]  
**Sent:** Friday, 7 June 2019 8:54 AM  
**To:** medboardconsultation  
**Subject:** Concerned by proposed two tier changes.

Dear Sir/Madam,

I am writing to you to address the proposed changes to the current medical guidelines.

As a breast cancer patient, I have been blessed to be able to use a mixture of 'conventional' medicine such as chemotherapy, in conjunction with medication such as melatonin which my integrative GP recommended and have since been cured without the need for painful radiotherapy. Please do not deny others the rights and easy access to these life saving people, practices and information. The harder government and legislators make it to receive and implement a diverse range of health care practitioners and practices, the more we the people suffer and die because of it.

My exact concerns are as follows:

- The grouping of integrative medicine with 'unconventional medicine' and 'emerging treatments' may create the impression of being "fringe" rather than evidence-based
- That many of the terms used in the rationale such as 'unconventional medicine', 'inappropriate use' and 'emerging treatments' leads to ambiguity and uncertainty
- That the term 'complementary medicine' also includes access to traditional medicines
- No evidence produced in the discussion paper quantifies risk in practicing complementary or integrative medicine vs 'conventional' medicine
- That there was NO consultation with the Integrative Medicine or complementary medicine community before the document's release
- That the current Good Medical Practice: A Code of Conduct for Doctors in Australia already adequately regulates doctors' practise and protects patient safety. There is no need or justification for a two-tiered approach
- That the right of patients to determine their own medical care is under threat
- That the lack of clarity on how to determine what is 'conventional' versus 'unconventional' can be misused by people with professional differences of opinion which results in troublesome complaints.

As stated above, there is no need for change and every reason for alarm in regards to this proposal.

Thank you for your time and hopefully, your thoughtful consideration.

Warm regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 4 April 2019 3:43 PM  
**To:** medboardconsultation  
**Subject:** Re: Consultation on complementary and unconventional medicine and emerging treatment

To whom it may concern,

As an Australian Citizen, I demand my right and freedom to choose the type of medical care I require and that my chronically ill child requires.

I have been diagnosed by an Australian endocrinologist and a general practitioner with severe hypothyroidism - a known and accepted condition that requires ongoing medical treatment. I have been on prescription treatment for this condition for years; and the efficacy of this treatment has become diminished, which severely impacts my quality of life. I consulted an integrative general practitioner, who prescribed a compounding medication - this treatment has allowed me to feel better, and has improved my productivity and overall quality of life.

My teenage daughter has been diagnosed and is living with severe and debilitating M.E./CFS. She was diagnosed by a leading immunologist at a major hospital in [REDACTED] and the diagnosis was confirmed by a specialist pediatrician at the same hospital. Neither of these doctors is able to prescribe medication or offer treatment to alleviate symptoms, other than pain medication. We have consulted with both an integrative practitioner and a complementary therapist. My daughter is currently in their care. Some of her symptoms have improved dramatically; and she is able to attend school part time.

If restrictions and limitations were placed on integrative practitioners across-the-board, patients like us could suffer unnecessarily. We should have the right to choose our practitioners and our treatment. Suffering from a debilitating illness that is currently not treatable by conventional GPs / Specialists is a sentence no-one could possibly understand unless they walked a mile in our shoes! My daughter has gone from a vibrant, high-achieving student to one who is only able to attend school part time; one who has given up her passion of studying music; and one whose dream to continue on to University to study medicine may become a pipe dream if we were unable to access adequate care and explore emerging treatment options.

The failure to treat and support patients with medically diagnosed M.E./CFS will one day be known as one of the biggest travesties in medical history (similar to patients who were encouraged by ignorant doctors to smoke for health benefits!).

I urge you to reconsider the planned restrictions on integrative practitioners who are bound by the same oath that all qualified medical practitioners undertake.

Sincerely,

[REDACTED]

[REDACTED]



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**From:** [REDACTED]  
**Sent:** Saturday, 29 June 2019 3:37 AM  
**To:** medboardconsultation  
**Subject:** MBA consultation on complimentary & alternative medicine

I come from a family that has experienced severe mental health problems and the conventional medical treatment they received was of no avail.

I have not experienced the chronic condition that my father and brother experienced but some years ago I was diagnosed by my GP and made redundant with anxiety neurosis and only offered antidepressants as treatment.

I did not take this drug because of the severe side effects and lack of a long term solution which I saw in other patients.

This challenge prompted me to carry out extensive research into alternative and complementary medicine also known as integrative or holistic medicine the treatment from which has substantially alleviated my condition by addressing the cause.

There is no doubt in my mind about the high standards of those I consulted and I firmly believe these disciplines from qualified practitioners are playing a major health role and they should be encouraged to work in tandem with the mainstream medical profession for the benefit of all.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 21 March 2019 10:29 AM  
**To:** medboardconsultation  
**Subject:** Complementary medicine

Dear Sirs,

I am a woman of 61 years and STILL suffering from post menopausal symptoms. After trying numerous over the counter HRT (at aged 53) I found Premia 2.5mg and it changed my life. 6 years later my GP urged me to stop taking it, for various reasons. My symptoms returned with a vengeance and I was back to my GP. I then went through 3 years of horrendous mood changes, loss of libido (much to mine and my husbands detriment), lack of vitality, and general loss of interest in life, my plug had been pulled!

After much discussion with my partner and GP I decided to return to Premia 2.5, only to be told it had been withdrawn from the market worldwide...to say I was disappointed is an understatement. Again I tried numerous over the counter HRT's, with some causing me to lose an enormous amount of blood (not happened since I was 50), 10 kilo of weight gain, depression and more. I was at my wits end, when a friend suggested I see a Compound Dr and Pharmacy as she had. I must say what a breath of fresh air from a MALE Dr who not only cared enough about my symptoms, and understood them, but was willing to help me do something about it. He returned my body to an energised quality of life I enjoy today.

Of course this comes at a cost to me, and possibly out the reach of a lot of women my age because none of this is covered by either my Private Health (homeopathy and alternate medicine removed from my extras) or the PBS....why I ask you? Don't the Pharmaceutical companies make enough money!

I hope your board includes post menopausal women who may be sympathetic to my plight, if not, then the males need to speak to their wives regarding this under rated woman's issue.

Kind regards [REDACTED]

Sent from my iPad

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**From:** [REDACTED]  
**Sent:** Monday, 1 April 2019 12:06 PM  
**To:** medboardconsultation  
**Subject:** Feedback complementary medicine

To whom it may concern,

I would like to give some feedback hearing about the possible changes to the Code of Conduct 2014.

I have been seeking the help of complementary medicine throughout my life. It started in my twenties when I had persistent eczema from birth that was getting worse and worse. I went to a practitioner who practised Bioresonance. He checked my whole body, told me what had caused the eczema and told me what was out of balance in my body, he gave me some drops I had to take during the day and the eczema of 20+ years disappeared and never came back!

For easy issues I go to my GP but for more persistent issues I always go to a complementary health practitioner because they tend to look at the whole body and don't just focus on the issue. It is my experience that when the whole body, is taken in consideration together with diet and life style, many complex diseases can be healed.

I've seen a complementary health practitioner to lose some weight and ended up seeing her for half a year, losing 13 kilo and healing my liver and gut and ended up having so much energy at the end of it like I have never felt before in my life! Apart from giving me herbs and supplements to take, she gave me at times very strict dietary guidelines (most of which I am still following), and guidelines about exercise.

I'd like to add that I am quite a sceptical person by nature. I don't just believe anyone. I need to feel that I can trust them and need to experience results. Sometimes it takes a bit of searching and trying out different practitioners before I find the right one. I am very happy with the ones I am seeing at the moment for my leaky gut. They are both trained as a GP and have qualifications in different types of complementary medicine. I can see the progress I am making through regular lab tests that are confirming my experience of my symptoms getting less. My skin is looking much better, I am have allergic reactions anymore, I have more energy, no more pain around joints, no more pain in my gut, feeling more optimistic and I am just overall feeling so much better!

And if I start to feel less good I usually can relate that to food choices that weren't as good, or sleeping too little, or not exercising enough, etc. I feel I am more in control of how I feel now and I have more tools and knowledge how to self-regulate.

For me it is extremely important to have the choice of a wide range of different practitioners. I sincerely hope that this will be the case in the future and that there won't be any regulations to stop this.

Kind regards,  
[REDACTED]

 Save a tree. Don't print this e-mail unless it's really necessary

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**From:** [REDACTED]  
**Sent:** Friday, 28 June 2019 2:54 PM  
**To:** medboardconsultation  
**Subject:** My Choice for treatment decided by my team - me and my Integrative Medical Doctor

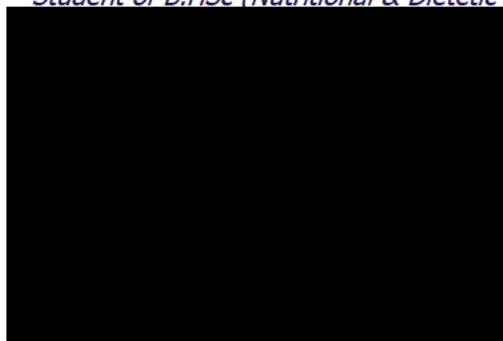
I choose Option 1: "no new regulations are required for doctors practicing in the areas of complementary medicine and integrative medicine". Research has shown that the patient history is the most important tool for diagnosis (<https://www.ncbi.nlm.nih.gov/pubmed/29769039>) and the standard medical model of ten minute consultations renders this impossible. I want to be in control of my own health and wellness and that of my family and this includes a doctor who can choose from both medical, drug, and non-medical and non-drug therapies on the basis of what is the most suitable treatment and not based on a regulatory framework imposed on the mass population. I also believe in the 'house-keeping' preventative paradigm of complementary medicine to ensure minimal requirement for symptom based drug interventions in the future. There are situations where a brief consultation is all that is required, but then there are other circumstances that require an extended consultation and the expertise of an Integrative Medical Practitioner to provide this. Last year I was extremely unwell after exposure to mould, and the GP I consulted had no knowledge of the adverse health effects of mould other than the exacerbation of asthma and was unable to provide me with the treatment I needed. Upon attending an Integrative Medical Practitioner, I was able to provide an extensive patient history, spent over an hour discussing the onset and effects of the cluster of symptoms I had been experiencing resulting in a range of treatments that enabled me to recover and heal.

There is no health based need to remove the ability for registered doctors to practice complementary or integrative medicine. The drive to change the current regulations that have in place all the required safety mechanisms is coming from the political lobby group opposing complementary medicine in the push to increase the public's reliance on drug based therapy which benefits the Pharmaceutical companies but not the health and wellness of the general public. The Medical Board of Australia (MBA) should be a truly independent body regulating for the wellness of the public and not under the direct control of political interest groups pushing profit over health. I call for the secrecy and lack of disclosure by the MBA to end, and the lobby groups involved in the MBA to be removed and for the effectiveness of complementary and integrative medical practices for a patient to be decided upon by the patient in consultation with their Integrative Medical Doctor.

Warm regards,

[REDACTED]

*Accredited Mould Technician*  
*Student of Adv.Dip Building Biology*  
*Student of B.HSc (Nutritional & Dietetic Medicine)*



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**From:** [REDACTED]  
**Sent:** Monday, 11 March 2019 12:18 PM  
**To:** medboardconsultation  
**Cc:** [REDACTED]  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments.

As an Australian citizen I feel it is crucial to have Freedom of Choice with complimentary and unconventional medicine when consulting an integrative GP or alternative health professional.

My son almost died at 5.5 months of age from a condition that was rare and unseen by most health care/professional/providers. To the point the hospital/mainstream nearly missed his diagnosis. The recovery took 12 months from that date and it was only because we choose to see an integrative GP that he was able to recover to where he is today. His monitoring is ongoing, and he has many side affects from the pharmaceutical drugs/antibiotics he was give over the 12 months. These side affects are ignored by main stream GP's and only because we see an amazing integrative GP his health has improved greatly.

The integrative GP has performed/ordered GUT tests, suggested dietary changes and supplements of vitamins and minerals and homeopathy. The results have been astounding and life changing.

Where a mainstream GP do not even recognize or acknowledge the symptoms.

No one size suits all and this is so very evident when carers look and believe in practices that have been around for decades. BIG PHARMA and or MAINSTREAM MEDICINE does not have to write to dictate the only way to recovery is with pharmaceutical medication with hundreds of side effects. You would think the medical 'Industry' would wake up to this bandage medicine. The world is getting sicker not healthier. Pharmaceuticals did not work and delivered unwanted side effects; wasting Medicare funds and resources.

I cannot even begin to imagine the impact on our family if our incredible integrative GP had not been there for us over the past 6 years to nurture and help our child recover.

Signed by  
[REDACTED]

11 March 2019

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**From:** [REDACTED]  
**Sent:** Friday, 5 April 2019 9:55 AM  
**To:** medboardconsultation  
**Subject:** Medical Board Submission

## **Medical Board Submission**

Regarding the public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments

As an Australian citizen I feel it's important that I have the freedom of choice in the type of medical care that I use to address my chronic health issues.

I have been suffering from Post Menopausal symptoms, depression, lethargy, lack of motivation, plus some other issues.

Conventional medical doctors have not been able to successfully treat my condition and bring me to a satisfactory level of health.

I am not prepared to use normal pharmaceutical hormone replacement therapy. There are known side effects including breast cancer. My own sister was taking HRT and within 6 months was diagnosed with breast cancer. Not only did her treatment cost the government money for her HRT but also a huge amount trying to save her life from breast cancer. What a waste of resources and taxpayers, ie my money! Natural hormones as prescribed by my doctor do better than HRT drugs and cost much less.

If I cannot see an integrative doctor, or the Doctor is restricted in what he or she is able to prescribe for me, I feel that my health will deteriorate and have a continuing impact on my family, my work, and my wellbeing.

The government has already taken away my choice to see a naturopath and other alternative therapies by not allowing health insurance companies to give rebates. I am very angry about this. I am much healthier when I see alternative therapists and integrative doctors than a normal GP who just wants to keep writing script after script. Please do not tie the hands of those few doctors who look outside the box to improve the health of their patients. Is this all about the big Pharma companies? Do they have power over the government? Doesn't the government want the Australian people to be healthier? It seems that anyone who might actually benefit the health of people, the government is trying to shut down!!

I pay tax, my husband and children all pay tax. We all vote and we will show how we feel at the polling booths on election day.

We want to be able to see who we believe will benefit our health and not have our government tell us who we can or can't see.

Very concerned,

[REDACTED]

[REDACTED]



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**From:** [REDACTED]  
**Sent:** Thursday, 6 June 2019 12:28 PM  
**To:** medboardconsultation  
**Subject:** submission

RE: Public consultation on complementary and unconventional medicine and emerging treatments.

Dear Medical Board of Australia,

I have read your Public Consultation paper and am writing to advocate for 'Option 1 - Retain the status quo of providing general guidance about the Board's expectations of medical practitioners who provide complementary and unconventional medicine and emerging treatments via the Board's approved code of conduct'.

I have been living with ME/CFS for 26 years and I have never been offered any treatment from any of the many General Practitioners I have seen.

I have had slight improvement with alternative therapies. Even though they have not "cured" me they have provided not only some relief but hope. I was close to being bed bound 10 years ago. Without alternative therapies I may have lost hope and continued to have a life not worth living.

Alternative therapies prevent health from worsening through treatment and education thereby saving the public health system from further costs.

There is also the consideration of choice. Living in a democratic country we should be allowed to choose our treatments. Not all conventional treatments are safe but they are still allowed.

Thank-you for the opportunity to hear my views supporting Option 1 and greater inclusion of complementary medicine as a valid and effective approach to improving health and well-being.

Yours sincerely

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, 9 April 2019 12:55 PM  
**To:** medboardconsultation  
**Subject:** Complementary Medicines

Dear Sir/Madam,

My 38 year old niece has Lyme Disease. She contracted this in London in 2008. It took many years to diagnose why she had severely deteriorating cognitive skills.

She needed to resign from her job. She could not remember how to get home from where she was and finally was bedridden.

She was lucky enough to find a doctor who would treat her with complementary medicine.

She was also lucky to be able to afford this.

She and I both believe that if she had not been treated in this way, she would not be alive.

You are supposed to help heal people, not prevent them from living.  
Please reconsider your submission to strengthen guidelines around medical practitioners providing complementary medicine.

Thanking you,

[REDACTED].

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**From:** [REDACTED]  
**Sent:** Sunday, 19 May 2019 7:32 PM  
**To:** medboardconsultation  
**Subject:** Integrative Doctors Practice

To whom it may concern,

I am contacting you to express my concerns at the proposed restrictions to the practice of integrative and functional medicine doctors in Australia.

My health is a high priority for me, and my focus is on maintaining my health through good nutrition, exercise and relaxation. My preference is for minimally invasive techniques and minimal medicine use. My preference for this type of medical care is an informed choice.

I expect that my right to access the doctor of my choice to be upheld. I expect that my health cover should include benefits for using the services of my preferred doctor.

It is also important that these doctors should also be able to practice without restrictions placed on them , being duly trained.

Please protect my right to the care of my choice and the doctors rights to practice without further restriction.

I have used the services of functional doctors to assist with the maintenance of my parents health and the results have been very satisfying.

Kind regards,

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 10 April 2019 9:50 AM  
**To:** medboardconsultation  
**Subject:** Right to Health Care of your choice

To Whom it May Concern

Regarding the public consultation on clearer regulation of medical practitioners who provide complimentary and unconventional medicine and emerging treatments.

As an Australian citizen I feel it is important that I have the freedom of choice in the type of medical care that I use to address my chronic health issues.

I have been suffering from Co infections from Lyme Disease, a number of viruses, chronic fatigue and chronic inflammation due to toxic mold exposure.

Conventional medical doctors have not been able to treat my condition successfully and bring me to a satisfactory level of health.

Parmaceuticals and the use of conventional methods simply did not work ( and in some instance also delivered unwanted side effects in my case) and , seemed to waste Medicare fund and resources.

It was only when I saw an integrative medical doctor who included lifestyle and diet changes plus supplements of vitamins and minerals to address my health concerns that my condition began to improve.

If I cannot see an integrative doctor, or the doctor is restricted in what he or she is able to prescribe for me, I feel that my health will deteriorate and have a impact on my ability to function and my overall wellbeing.

I believe that society must allow this free choice of treatment as in my experience I feel that I would have been dead or extremely disabled by now if I hadn't have found these type of doctors.

Regards

[REDACTED]  
10th April 2019

25<sup>th</sup> April 2019

Medical Board of Australia

As an Australian citizen, I should have the right to choose what methods I use to address my chronic health issues. I have been suffering from recurrent thrush.

I started treatment with conventional medical doctors which were unable to successfully treat my condition. Using a GP prescribing pharmaceuticals and the use of conventional methods simply did not work and seems to waste far more Medicare funds and resources.

Until I saw an integrative medical doctor who included lifestyle changes, diet and supplements to address my problems my condition remained unchanged and became more chronic. The difference is an integrative medical doctor looks at the underlying issues and addresses these issues where as a conventional medical doctor only treats the symptoms without treating the underlying issues.

It is my intent to continue seeing an integrative medical doctor as my health has improved and I now have a better understanding of my body and know how to maintain my wellbeing. I trust the Medical Board of Australia will make the correct decisions and allow the integrative medical doctors to practice and utilise their knowledge to treat the Australian public.

Regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, 13 May 2019 10:31 AM  
**To:** medboardconsultation  
**Subject:** Public consultation on complimentary medicine and emerging treatments

To whom it may concern

Please consider this letter a formal submission in response to the Medical Board of Australia's proposal to strengthen the guidelines surrounding medical practitioners who provide complementary and unconventional medicine. I am highly concerned at these proposed changes and do not agree with them for reasons which I will attempt to outline below.

Specifically, it is alarming that once again Lyme Disease (or Lyme-Like and associated tick borne illnesses) has been called out as an area of concern. It is disappointing to see that Australia is so far behind the latest peer reviewed research in this area, and even more shocking that the Medical Board intend on creating a set of guidelines which will more than likely restrict our highly capable doctors from practising good health care, which is not entirely based on outdated options that come from large pharmaceutical and insurance companies.

I cannot thank my doctors enough for the risks they take on themselves with Boards such as yours that are continually putting up road blocks when it is quite clear to the majority of patients, that the combined allopathic/complementary treatment protocols work.

Imposing an increase in restrictions through changes to the guidelines will almost certainly stifle innovation and advancement of medical treatment options available in this country, and not just pertaining to Lyme Disease, but to other chronic and disabling illnesses also. Australia's medical system will slip even further down the rankings than it already is. Perhaps we should look to progressive countries such as Switzerland who are doing the complete opposite and are encouraging the use of complementary medicines?

I have personally used Complementary, Unconventional and Emerging Medicine and I highly value its availability and I am very happy with its practice. My treating doctor already provides discussion about options for treatment and their relative merits and potential problems. I value free choice in making decisions regarding my own personal medical treatment. My adult son, who has been sick and unable to work for 4.5 years, has a diagnosis for Lyme disease, from a test that had to be sent overseas. He has more success with treatments from alternative therapies than with regular doctors who are too quick to prescribe drugs that have done more harm than good.

The suggestion of strengthened guidelines is far too controlled, an attack on my human right to seek any treatment I choose (which has worked). Whether you agree or not with the diagnoses, the treatment plans, it is not the Medical Board's decision to hold my future at jeopardy because of its own antiquated ideology.

As such, my preferred choice of the proposed outcomes is to retain the status quo, otherwise fellow sufferers will only have the option of travelling overseas, where they are at even greater risk of complications. Australia is not a third world country, and my expectation is that I should be able to attain the treatment of my choice, here at home.

Moreover, if the Medical Board eventually decides to implement Option 2 (greater regulation) I demand that: it applies to ALL medical practitioners with the same onus of exhaustive exposition of all treatment options, research etc; and that the Board accept that integrative medicine, utilising Complementary or Unconventional or Emerging Medicines well as conventional medicine, will be recognised as a Speciality, in order to allow increased Medicare rebates to help cover the increased costs of fulfilling the new regulations.

Your sincerely  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, 5 March 2019 9:08 AM  
**To:** medboardconsultation  
**Subject:** Medical Board Submission - natural therapies

Regarding the public consultation on clearer regulation of medical practitioners who provide complimentary and unconventional medicine and emerging treatments

As an Australian citizen/resident I feel it's important that I have the freedom of choice in the type of medical care that I use to address my chronic health issues.

I have been suffering from: menopause

Conventional medical doctors have not been able to successfully treat my condition and bring me to a satisfactory level of health.

Pharmaceuticals and the use of conventional methods simply did not work and delivered unwanted side-effects. It was only when I saw an integrative medical doctor who included lifestyle change, diet and supplements of vitamins and minerals to address my problems that my condition began to improve.

If I cannot see an integrative doctor, or the Doctor is restricted in what he is able to prescribe for me, I feel that my health will deteriorate and have a continuing impact on my family, my work, and my wellbeing.

People need to be able to have a choice as to who they see and Doctors should be able to have a choice as to what they can offer for the overall wellness of their patients.

[REDACTED]  
5/3/2018

Social Media Manager



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**From:** [REDACTED]  
**Sent:** Monday, 15 April 2019 3:59 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

Dear Sir/Madam

I am aware that there is a public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments.

I am an Australian citizen who has had the good fortune of living overseas for twenty-six years in 4 other countries. I have now been back in Australia for over two years. During this time I was diagnosed with Hypothyroidism and Adrenal Fatigue. My experience in trying to heal myself with the help of conventional doctors has been extremely disappointing. However, when consulting with complementary/integrative doctors, who have spent the time to get to the root cause of the condition, and put together a healing plan, I was able to start the journey to improving my health.

Visiting many GP's and specialists over the years, who do not have the time or training in nutrition and the many lifestyle changes that can help a patient, was a waste of my time and, no doubt, the medical systems' resources.

I now visit a functional medical doctor, as does the rest of my family, and we have found this to be invaluable for our health and wellbeing.

If we are not able to visit with a integrative/functional doctor, or the doctor is restricted in what he or she is able to prescribe for me, I feel very strongly that the health of my family will be impacted.

I am a strong believer in looking to good practice rather than having to re-invent the wheel. May I suggest that looking to successful functional medical practices and their benefits in other countries would clearly show the health and financial benefits to following such a course in Australia.

Thank you and kind regards

[REDACTED]



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**From:** [REDACTED]  
**Sent:** Thursday, 4 April 2019 3:08 PM  
**To:** medboardconsultation@[REDACTED]  
[REDACTED]  
**Subject:** Proposed Changes to Complementary and Unconventional Medicine & Emerging Treatments

To:  
Directors of the Medical Board,  
Federal Minister for Health, Greg Hunt  
Federal Shadow Minister for Health, Catherine King  
NSW State Minister of Health, Mr Brad Hazzard,  
NSW State Shadow Minister for Health, Mr Walt Secord,

I write to you all today re *consultation on complementary and unconventional medicine and emerging treatments and the proposed changes* which will cause major life changing issues for someone like me and the millions of others that suffer with autoimmune and thyroid conditions that most 'conventional' medicos don't seem to understand or let alone are able to treat. When will those making decisions on our behalf, without consultation, understand that there are millions of people like me who rely on integrated doctors and medicines? Not wanting to sound too dramatic – but our lives truly depend on it.

As someone who has spent hundreds of thousands of dollars and been shuffled through the "conventional" medical route, visiting local GPs, doctors, specialists, professors and numerous other so called "specialists in their field" searching for answers and treatment to an autoimmune problem – a condition that turned my life upside down - was one of the most frustrating, depressing and in some case infuriating times of my life. For 20 years I followed 'conventional' doctor's instructions (many of which contradicted the ones prior), took antibiotics that were prescribed (actually did more damage) and wasn't getting better – if anything I was getting worse.

Of course when you are unwell, everyone has their "special guru", and let me tell you I had tried EVERYTHING and EVERYONE. I had all but given up hope, however one doctors name Dr [REDACTED] (MB.BS, FACNEM) kept coming up – she apparently was having incredible success with varied conditions, so I thought, OK this is the last one. Again, I went on yet another waiting list – and thank god I did ... because she immediately took an interest - she studied my folder (*I kept all my records and results from years past*) of where I had been, what tests I had already had and she told me that it wasn't in my head and I wasn't going mad, that I was in fact "very sick". Within 10 minutes of us talking and her reading my file – she said – oh you have LUPUS? She found that LUPUS was found in my blood tests back in 2012, however I was never told. This went untreated and NO OTHER DOCTOR/SPECIALIST/PROFESSOR seen in the interim who had viewed (nor not) the same file had picked it up!

She didn't give me a script and shuffle me out of the door within fifteen minutes asking me come back in 3 months – no this DOCTOR actually listened, consoled and made a plan of action that we both agreed with. I went for several more tests and followed her plan and within EIGHT WEEKS, my life started to dramatically change and I started to feel a new kind of normal – like I used to feel when I was in my early twenties. I lost weight, woke up in the morning with a spring in my step, clear head, my muscles didn't ache as much, my brain fog and depression was lifted and I actually had energy which lasted more than two hours for the first time in 20 years. I could actually go for a walk like normal people and not have to come home and go back to bed. In other words, [REDACTED] not only changed my life – she saved it. She took the time to find out what was going on and then explained to me what was happening and why my body was behaving this way.

Being treated by an integrated doctor and having compounding medicines which work, has saved my life. The only downside is that most of my blood tests (which through a conventional doctor would be covered) and medicines (which for me - are essential) are not covered by Medicare or even my top tier health funds.

Perhaps the government and medical board could become more open minded and see that yes there are millions of people who actually benefit from these integration specialists who take the time to diagnosis properly; the compounding chemists who create the medicines tailored specifically for you so you can indeed heal and get well again, because these are the true heroes. The big pharmaceutical companies don't care or understand ... they just think of the money.

So here are my concerns:

- The grouping of integrative medicine with 'unconventional medicine' and 'emerging treatments' may create the impression of being "fringe" rather than evidence-based
- That many of the terms used in the rationale such as 'unconventional medicine', 'inappropriate use' and 'emerging treatments' leads to ambiguity and uncertainty
- That the term 'complementary medicine' also includes access to traditional medicines
- No evidence produced in the discussion paper quantifies risk in practicing complementary or integrative medicine vs 'conventional' medicine
- That there was NO consultation with the Integrative Medicine or complementary medicine community before the document's release
- That the current Good Medical Practice: A Code of Conduct for Doctors in Australia already adequately regulates doctors' practise and protects patient safety. There is no need or justification for a two-tiered approach
- That the right of patients to determine their own medical care is under threat – especially in my case
- That the lack of clarity on how to determine what is 'conventional' versus 'unconventional' can be misused by people with professional differences of opinion which results in troublesome complaints
- So called 'conventional' doctors - especially GPs generally appear to be overbooked therefore not able to give you the proper time to diagnose and treat you.

Perhaps you would consider:

- Everyone is different ... millions of people benefit from integrative medicine and doctors
- What can we do as a government to SUPPORT these professionals and their patients – benefits, rebates, etc.
- Subsidise some of their testing so others can afford to have it done and reach an answer so much faster.
- Subsidise some of the compounding medicines that are made making such a huge difference with autism, thyroid, autoimmune issues, depression, mental illness and the list goes on.
- Start supporting the Integrative Medical professionals instead of crucifying them

Or perhaps, just imagine, god forbid, one of your family or children suddenly became incredibly ill and for years and years you drag this person through the “conventional system” of doctors, specialists, professors and all their other university mates your doctor can think of – not forgetting that the local GP gets the results and has to write the referrals each time – to be told that it may be a viral infection or worst still “that it’s in your loved one’s mind”.

I am sure, that if you weren’t getting any results and your loved one wasn’t a typical text book case – *which many of us are not* – and they weren’t getting any better but a lot, lot worst ... you would certainly start seeking help from elsewhere. Thankfully, ‘integrated doctors’ take the time to find out what was wrong with you and actually suggest treatment plans where you started seeing results. I guarantee then ... you would think ...

- Why didn’t we go there sooner? Then you will be asking yourself ...
- What the hell is our Government and the Medical Association thinking – why aren’t we celebrating the achievements of these PROFESSIONALS?
- Why aren’t they discussing ways in which they can help with subsidises and processes that can support these PROFESSIONALS who are clearly making a massive difference to people’s lives?
- And worst still, why is the Government trying to punish these PROFESSIONALS and in turn their patients?

I know I will probably never get a response to my letter, but I do hope that as a tax payer and citizen of this great country that my opinion counts and that you will all consider my questions and support these PROFESSIONALS who are doing incredible work to help the people like me who need it.

Yours sincerely,

[Redacted Signature]

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**From:** [REDACTED]  
**Sent:** Tuesday, 12 March 2019 7:12 PM  
**To:** medboardconsultation  
**Subject:** Complimentary medication

I am really disappointed that you are doing this I take compound low dose naltrexone I have hashimottos and I also take a small dose of tertroxine before I started these I couldn't get out of bed most days when I did I got as far as the couch I couldn't get to work everyday so I was in jeopardy of losing my job which mental I would have lost my house since taking theses extra medications my life has turned round a hundred percent please think about the devastating consequences you will inflict on the patients that relay on theses meds just to live normal lives everyday if I go back to where I was before them I might as well not live because that was not a life it was just an existence

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**From:** [REDACTED]  
**Sent:** Wednesday, 20 March 2019 9:02 AM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

Hello,

I have autoimmune disease - Hashimotos Thyroiditis. I received treatment for several years from my conventional medicine GP. The treatment consisted only of taking synthetic thyroid supplements. Despite taking these tablets, I didn't feel well. I had chronic fatigue, depression and severe hair loss. I sought second and third opinions from other conventional GPs and received the same advice. They said all I can do is take the synthetic thyroid tablets. They said I should be feeling fine because my TSH levels were now in the normal range. However my thyroid antibodies were getting higher and higher and nothing was being done to address this. My thyroid was being destroyed by my immune system.

I went to see an integrative doctor. She put me on a gluten free diet, prescribed me T3 hormone supplement and reduced my synthetic thyroid hormone dose. She took other steps to heal my gut, such as consuming bone broth, taking a course of erythromycin to combat strep, and taking a course of probiotics.

Over a period of 12 months, following the integrative doctor's program, my thyroid antibodies reduced to almost zero. I have all the blood tests to prove this. My immune system is no longer attacking my thyroid and all those unpleasant symptoms have disappeared (chronic fatigue, depression, hair loss etc).

I'm disappointed that my conventional GP's weren't able to help me with my Hashimotos Thyroiditis. I still continue to see conventional GPs for all issues except my autoimmune disease. They let me down in that area of my health. Thank goodness integrative medicine was there to help. I'm a busy mum who works full time and I need to be healthy.

I rely on integrative medicine to function normally every day.

Kind regards,  
[REDACTED]

# Submission - Consultation on complementary and unconventional medicine and emerging treatments

## Introduction and Preferred Option

My views on this matter are based on my own experiences as a patient of both conventional GPs, and 'holistic' GPs who provide complementary and unconventional medicine; the experiences of close family members; and my wide, in-depth reading and learning (over many years) about various health related issues.

Regarding the regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments, I believe there is already sufficient regulation, and that further strengthening regulation would most likely result in less choices for patients, less innovation, and ultimately poorer health outcomes for many people who have benefited from complementary and unconventional medicine and emerging treatments. So in my view, the Medical Board of Australia should adopt Option 1, rather than their preferred Option 2. Some of the reasons for my view will be outlined in this submission.

## Review of salient points in the Discussion Paper

Regarding "**Consumer expenditure**" and "**Issues and concerns ...**" - on p6 of the discussion paper it states that "A large proportion of consumers (more than two-thirds), report using complementary medicines" and that "the use of complementary and unconventional medicine and emerging treatments is increasing ...". Surely this is evidence that consumers are finding these medicines and treatments beneficial, which suggests that further regulation is unwarranted.

Other "**Issues and concerns ...**" stated on p6 include: "patients are being offered treatments for which the safety and efficacy are not known"; and "While there may be benefits - treatment and therapies may also have no effect, the benefit may be uncertain, or the effect may potentially be harmful. The harm can be physical, psychological and/or financial"; and "The lines between research and commercial advancement can be blurred and conflicts of interest can arise if the provider has a financial interest in the product or service being offered." These accusations apply equally, if not more so, to conventional medical treatment for the following reasons:

- So called "evidence based medicine" is compromised due to a significant level of fraud and manipulation in clinical trials and "scientific" studies. This makes a mockery of the claim on p6 of the discussion paper that "Patients don't have the usual protections where clinical trials have not been undertaken." For example: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4340084/> and <https://onlinelibrary.wiley.com/doi/full/10.1111/jep.12147> and <https://www.ncbi.nlm.nih.gov/pubmed/24088143> and <https://ethicalnag.org/2009/11/09/nejm-editor/>
- Vested interests strongly influence medical research and practice. For example: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5765617/> and <https://blogs.scientificamerican.com/guest-blog/can-the-source-of-funding-for-medical-research-affect-the-results/> and <https://www.nps.org.au/australian-prescriber/articles/bad-pharma-how-drug-companies-mislead-doctors-and-harm-patients> and <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4046551/> and <https://www.globalresearch.ca/big-pharma-and-the-money-making-business-of-medicine/5485017>

- Iatrogenic disorders and deaths are rampant. Though most evidence relates to the USA, and Australian statistics are difficult to find, Australian medical practice is heavily influenced by US medical authorities, so it is highly likely the statistics here would also be cause for concern:  
<https://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;db=CHAMBER;id=chamber/hansardr/2010-02-03/0216;query=id:chamber/hansardr/2010-02-03/0000> and <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4923397/> and <https://www.bmj.com/content/353/bmj.i2139> and [www.webdc.com/pdfs/deathbymedicine.pdf](http://www.webdc.com/pdfs/deathbymedicine.pdf) and <https://www.bmj.com/content/344/bmj.e3989> and [www.asanet.org/sites/default/files/savvy/footnotes/nov14/prescription\\_1114.html](http://www.asanet.org/sites/default/files/savvy/footnotes/nov14/prescription_1114.html)
- Out of pocket expenses for Australian patients undergoing conventional medical treatment can be devastating:  
[https://www.abc.net.au/news/2018-04-05/medical-treatment-out-of-pocket-costs-top-\\$10k-study-finds/9619344](https://www.abc.net.au/news/2018-04-05/medical-treatment-out-of-pocket-costs-top-$10k-study-finds/9619344) and <https://www.abc.net.au/news/health/2018-05-28/how-out-of-pocket-medical-costs-can-get-out-of-control/9592792> and [The Out of Pocket Costs in Australian Healthcare - Aph.gov.au](http://TheOutofPocketCostsinAustralianHealthcare-Aph.gov.au).

Regarding "**Concerns as to practices ...**" on p8 of the discussion paper - specifically the following:

Concerns about inadequate consent including:

- known risks not fully disclosed
- potential lack of benefit not communicated clearly
- unsupported claims of efficacy and safety
- false claims of benefit

Again, these accusations apply equally to doctors who practice conventional medicine - as has been my own experience, one instance of which will be described under **Personal and Family Health Care Experiences** below.

In fact, time constraints on conventional GP appointments would limit the time available to adequately discuss such issues. Furthermore, based on the fact that clinical trials are often fraudulent, in many cases doctors would be unaware of all the risks; or that claims of benefit and efficacy are actually unsupported.

Inadequate consent has even led to litigation in Australia:

<https://www.mja.com.au/journal/2011/195/6/when-informed-consent-goes-poorly-descriptive-study-medical-negligence-claims>

Excerpt: Of nearly 10 000 Australian medicolegal cases resolved in the 7 years 2002–2008, around one in 30 medical negligence claims and one in nine conciliated complaints included allegations of problems with informed consent.

Also on p8, regarding "**Poor patient management ...**" - specifically the following:

- inadequate or inappropriate testing or investigation
- missed, incorrect, or delayed diagnosis
- delayed or inadequate referral to appropriate specialists
- inadequate or inappropriate follow-up/monitoring or review
- inadequate co-ordination of care - failed to obtain medical history from the patient's existing treating practitioners

Once again, these accusations apply equally to doctors who practice conventional medicine. In fact, my father has experienced all of the above, aspects of which will be briefly described under **Personal and Family Health Care Experiences** below.

Regarding "**Adverse events data**" on p10 of the discussion paper, under-reporting of adverse events is also common in conventional medicine: <https://www.ncbi.nlm.nih.gov/pubmed/16689555>. Considering the alarming statistics on iatrogenic harm to patients outlined above, this under-reporting in conventional medicine is of serious concern - whereas with complementary medicine, reported adverse events tend to be far fewer and usually less damaging, so such under-reporting would most likely be of far less consequence.

Regarding the **National Health and Medical Research Council's** review of homeopathy cited on p14 of the discussion paper, it has been found this review is flawed and biased: <https://www.yourhealthyourchoice.com.au/news-features/science-fact-or-fiction-nhmrc-admits-they-did-not-use-accepted-scientific-methods-2/> and <http://www.nhmrchomeopathy.com/procedural.html> and <https://www.homeopathyoz.org/blog/292-facts-about-the-nhmrc-homeopathy-review>

The NHMRC's most recent review of water fluoridation was also criticised as being flawed and biased: <http://fluoridealert.org/wp-content/uploads/fan-australia.nhmrc-fluoridation-critique-8-3-17-1.pdf>

This does not engender much confidence in other NHMRC reviews of natural therapies.

## **Personal and Family Health Care Experiences**

I must admit, I have become increasingly disillusioned with aspects of conventional medicine. Without going into great detail, following are some of the reasons for this.

My father's health suffered significantly some years ago, and again last year, due to misdiagnoses of serious health conditions - in both cases by several GPs and in the first case by several medical specialists as well. In the first case, based on my own general knowledge, I told him that his symptoms sounded similar to leukaemia, wondering why doctors hadn't investigated this possibility. Eventually my suspicions were confirmed, but not till my father had become very frail and ill. He credits his recovery to following dietary advice and taking supplements advised by a herbalist, in addition to the conventional treatment.

In the second case my niece, an occupational therapist, suspected my father was suffering from whooping cough, but two GPs he saw, and several doctors at the hospital where he was admitted, told him it wasn't whooping cough. It was only when he finally insisted on being tested (by which time he had recovered somewhat with the use of supplements recommended by a natural therapist) that it was found that he did indeed have whooping cough.

In 2011 my brother-in-law died as a direct result of medical negligence. My sister had neither the financial resources, nor the strength to take legal action. Besides, particularly in Queensland where this occurred, the likelihood of getting justice in such cases is slim, because doctors are reluctant to give evidence against other doctors: <https://www.lawyersweekly.com.au/sme-law/22738-qld-patients-victims-of-unfair-medical-negligence-legal-process>



Several years ago our daughter had what could be described as a 'nervous breakdown,' after she had developed symptoms similar to multiple sclerosis. When various tests showed nothing out of the ordinary, her GP prescribed Serepax, which our daughter stopped taking because of the side effects she experienced, and because it wasn't helping improve her 'multiple sclerosis-like' symptoms. I persuaded her to visit a holistic doctor, who suspected Pyroluria - a condition unknown to most conventional doctors - and which a urine test confirmed she has. The holistic GP prescribed a regimen of supplements tailored to her needs, and after about 8 weeks of treatment our daughter fully recovered. Some time later she decided to stop taking the supplements, and soon thereafter had a relapse. After getting back onto the supplements, she recovered again. Pyroluria cannot be treated with drugs. If it weren't for the holistic GP's knowledge, our daughter would likely be taking dangerous psychiatric drugs now, instead of a range of natural supplements.

In my case, due to elevated cholesterol my conventional GP prescribed Lipitor. But as I had read some books and several studies that revealed the risks of taking statin drugs; that studies supporting statins are flawed (if not fraudulent); that the risk of death from heart disease is not significantly reduced by taking statins; that cholesterol is needed for various bodily functions; and a recent study that showed women with higher cholesterol tend to live longer, I refused to take them. At no point in the consultation did my doctor inform me of the lack of substantial evidence of real benefits of taking statin drugs, or of the risks, other than possible muscular problems.

Then I decided to see a holistic GP. What a different experience that was - well worth the extra cost. Time was taken to look thoroughly at my overall health history, as well as my lifestyle, and the impact of toxins I had been exposed to during my working career. Due to my elevated cholesterol my new doctor thought it wise to have a calcium score test done. This showed I had zero calcification, thus vindicating my decision not to take statin drugs.

My health has improved since making some minor dietary changes and taking a range of natural supplements, on the advice of my holistic doctor. At 65 years of age, I rarely need to visit a doctor, am not taking any prescription drugs, and therefore am not a drain on the health system. Had I not done my own research and decided to change GPs, who knows what drugs I might be taking now, and what they might be doing to my health.

## **Impression gleaned from the Discussion Paper and Draft Guidelines**

Overall, the materials provided regarding this public consultation give the impression that the Medical Board is trying to clamp down on medical practitioners who don't toe the line of conventional medical practice. The reasons given for this smack of hypocrisy, because the accusations levelled at medical practitioners who practice outside what is regarded as the norm, usually apply equally to conventional medical practice, as shown in the evidence provided above. This appears to me, based on what I have observed for some years now, to be part of an agenda by conventional medical authorities (aided in many instances by the mainstream media) to discredit natural therapies, and any treatments outside conventional medical practice; and to completely control which medical treatments are authorised.

## **Conclusion**

Despite assurances to the contrary on p18 of the discussion paper, I suspect if option 2 is adopted by the Medical Board consumer choice **would** be reduced; medical practitioners' practice **would** be restricted; there **would** be cost increases for medical practitioners and consumers; and innovation **would** be stifled. As for not restricting "[existing, accepted practice that may fall within the definition of complementary and unconventional medicine and emerging treatments](#)" - if the Board's definition of "accepted practice" is guided by the



biased views of the NHMRC, then it is likely practices that many consumers have found helpful **would** be restricted, and their health would suffer.

Already the NHMRC's actions have led to the removal of various natural therapies from private health insurance - yet there has not been a lowering of premiums to compensate. Quite the contrary. This has made many consumers and practitioners angry, because it will ultimately cost consumers more to continue using those therapies, and natural therapists will lose business as a result. Is it too cynical to suggest that perhaps that was the aim?

Ultimately however, the greatest danger that I see if option 2 is adopted is that innovation **will be** stifled; and with growing epidemics of cancer, auto-immune diseases, diabetes and autism, despite everything conventional medicine has to offer, that would be a tragedy and a crime.

[REDACTED]

[REDACTED]

Submitted: 11th April, 2019

**From:** [REDACTED]  
**To:** [medboardconsultation](#)  
**Subject:** MBA Consultation paper  
**Date:** Tuesday, 19 March 2019 11:08:37 AM  
**Attachments:** [REDACTED]

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Hi

I would like to voice my concerns regards the MBA Consultation Paper in February which is Aim to tighten guidelines to redefine 'safe medical practice' basically ruling out alternate complementary medicine & gaining the power to de-regulate an medical practitioner who speaks or steps outside your guideline.

We do not live in North Korea or a 3<sup>rd</sup> world country, so suggest keep freedom of choice alive. Conventional Medicine is needed but it is not the sole answer & neither is Alternate or unconventional medicines but together make up an overall health system this country needs.

I have personally seen 1<sup>st</sup> hand the huge benefits Alternate medicines & practices can give. My son who what diagnosed with Autism at the age of 2, a very sick little boy lost in his own world spinning wheels for hour & days on end, unable to interact or go into public. Through a combination of 8 years of naturopathy or intense alternate therapy we learnt in the States, our son is a different child, he is off the spectrum & in a main stream school, very happy, healthy, functioning boy. Please do not take it upon yourself to take the choice away for others,

Regards

[REDACTED]

[REDACTED]

## Medical Board Submission

Regarding the public consultation on clearer regulation of medical practitioners who provide complementary and integrative medicine and emerging treatments.

As an Australian citizen I feel it is vital that I have freedom of choice in the type of medical care I have to address my health issues

Some of my medical conditions include chronic arthritis, spinal stenosis and digestive issues.

I have been prescribed a range of conventional pharmaceuticals over the years which were not completely successful and frequently delivered unwanted side effects. It was only when I saw an integrative medical doctor who included lifestyle change, diet and supplements of vitamins and minerals to address my problems that my condition began to improve. To this end I have actually been able to stop using some of the pharmaceuticals I had been taking for years.

Restricting my ability to see an integrative doctor, or if my Doctor is restricted in what he or she is able to prescribe for me will lead to a deterioration in my health and wellbeing. I am extremely concerned by what I see as an infringement of my rights to use the medications which my doctor and I deem to be most efficacious to maintaining and improving my health.

Concerned

[REDACTED]

13/4/2019

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**From:** [REDACTED]  
**Sent:** Wednesday, 10 April 2019 4:01 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments.

Consultation on complementary and unconventional medicine and emerging treatments.

I choose option one. Please retain the Status Quo.

As I Have adrenal Fatigue and my son has Chronic Fatigue, and a daughter with anxiety and Depression. We all have used alternative means to help these illnesses. Conventional Medicine has not helped us at all.

As an ex Registered Nurse I have seen first hand the damage of conventional medicine in the hospital setting and in the community.

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**From:** [REDACTED]  
**Sent:** Thursday, 27 June 2019 7:19 AM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

Hello,

I wish to tell my story in the hope that it will provide insight into why Integrative Medicine Doctors should be permitted to keep practising in the manner that they do.

I chose to see an integrative medicine doctor because I just didn't feel right. Despite a CT scan of my abdomen and visits to various GPs who would spend all of five minutes with me, I was not satisfied that there was nothing wrong. I was tired, I had terrible night sweats and mild bloating. Doctors put my symptoms down to menopause. I actually thought I had adrenal fatigue and I went in search of a doctor that might be open to my self diagnosis.

A friend recommended an IM doctor. He was expensive and I filled in a long form and waited weeks to see him. When I did see him he spent 1.5 hours with me. He was the first doctor that actually physically examined my stomach area and he recommended I have an abdominal ultrasound. I didn't for a minute think there was anything wrong with that area but after the ultrasound I was told I needed a CT scan. I was still in disbelief that anything could be wrong inside my abdomen as I had had the same CT scan 18 months prior with the all clear.

The CT scan, however, revealed a lesion near my stomach. When they compared my previous scan (performed by another radiology practice) the lesion was also seen on that scan, meaning that it had been missed 18 months earlier. It had also increased in size from the earlier scan.

Things moved very swiftly from there and ultimately surgeons removed a 3 cm malignant gastrointestinal stromal tumour (GIST) together with a section of my stomach. All the way through my IM doctor kept in contact with me and told me of supplements to take prior to and after the surgery.

GISTs are rare and unpredictable tumours. Most people do not find out they have a GIST until it is too late. I was very, very lucky that my IM doctor listened to me and examined my stomach. This is a simple step that regular doctors had failed to take, I believe, due to making assumptions, not listening to a patient who does not feel right, and rushing to get me out as quickly as possible. It would have been easy for my IM doctor to dismiss my concerns and rely on the fact that a CT scan had been performed only 18 months earlier, but of course we now know the GIST was missed on that scan.

My IM doctor was vigilant, patient, thorough and he thought outside the box. Those factors, I believe, saved my life and I will be forever grateful to my IM doctor. I was only 51 at the time of diagnosis.

My IM doctor continues to monitor me post surgery running thorough blood tests and recommending changes to my diet and supplements. There is a risk of future cancer but I take great comfort in the fact that I feel somebody truly has my back and I am now doing everything I can to prevent a relapse. He is not a quack or a witch Doctor. He is a medical doctor who still used his skills and medical science to ultimately diagnose me.

I would be absolutely devastated if my IM doctor could no longer continue to practice in the manner that he does. I strongly believe there needs to be an alternative for those that have searched far and wide in the medical community to find an answer to their health concerns. It truly is a matter of life or death for some of us.

Regards  
[REDACTED]

## **Submission to the Medical Board of Australia: 30/6/2019**

### **On Complementary and unconventional medicine and emerging treatments.**

I am 77. I want to talk from my experience of illness and the medical system amongst my family and other people I know.

1. There are some people in the community who are well and almost never need a doctor.
2. The majority of the population are well most of the time, and need a doctor when they get sick or injured. They are treated adequately by the medical system and eventually get better.
3. Some people have clearly defined long term illnesses such as diabetes, cancer, MS, heart disease, rheumatoid arthritis etc. They will have a specialist who knows a lot about their illness overseeing their treatments.
4. Some people have chronic illness, which could be extremely disabling, but is not able to be diagnosed into any of the known categories of illness. There is no specialist which matches their set of symptoms, which might manifest in many systems in their body. They have had countless tests and investigations finding nothing much. They may have had a history of referral to various specialists who have each said that there is nothing wrong in their specialist area, although they acknowledge that the person is very sick. Their GPs will do their best with pain management and other symptom management. They will often be offered the option of anti-depressants to help them through each day. (There are some who are correctly diagnosed with mental illness who respond well to psychiatric treatments and rightfully belong to group 3, but others who are incorrectly diagnosed who rightfully belong to group 4.)

The latter two groups (3 and 4) will seek out integrative doctors. The former two groups (group 1 and 2) hold most of the positions of power and decision making in our society and may not be aware of the importance of integrative doctors for some people.

Group 3 will often implement healthy lifestyle changes (exercise, good diet, stress reduction). In addition, they may have acupuncture if they find it helps, meditation and yoga, and will go to an integrative doctor and develop a regime of supplements. They will continue with these if they help. Most will continue to see their mainstream specialist on a regular basis and use the medication which is specifically designed for their condition.

Group 4 people are the most dependent on integrative doctors because nobody else in mainstream medicine knows how to deal with them. They have been dropped into the doctors "too hard basket". Good integrative doctors are in demand. Many sick people try to get into one, but can't because there are not enough of them. In my experience, they have a much wider set of tools. They are more likely to be aware of what treatments are being used overseas (in US or Europe) and they are more knowledgeable about the impact of supplements and new therapies. They have built up experience in treating people with complex undefined illnesses including CFS and Lyme like illness. I have also found my integrated doctors particularly sound in their knowledge and application of mainstream treatments. The integrative doctors I have had dealings with have always started with a comprehensive list of mainstream diagnostic tests and investigations (more so than other GPs I have dealt with).

I would like to address the list of concerns listed in your discussion paper.

1. **Safety and efficacy. I think it is really important to separate the issue of safety from the issues of efficacy.** If there is anything unsafe about a treatment or supplement we should know about it. (For example could it cause a heart attack or stir up a dormant cancer?) Government controlled safety assessments such as those carried out by TGA are important and should be continued. However, I would be willing to try something which is safe but may not work, but would hesitate to try something which is unsafe but likely to work.
2. **Unnecessary or ineffective treatments.** Picture a person from group 4 who has an ill defined illness which is having a devastating impact on their life, making them unable to work or even look after themselves. The evidence based treatments are not available because the research has not been done at the level the medical profession would like. This kind of research is expensive and cannot be done without substantial funding. So does the patient wait for years for that evidence to appear, or do they try something which has some lower level of evidence, or has seen to have worked for some people. You might be lucky, or you might have spent money and got no results. Anything is better for the soul than sitting around saying I can't try anything until they are absolutely sure it is effective. It should be the patient's right to make decisions about this type of treatment. After all, healthy people pay money to bungee jump or gamble or drink alcohol and we don't stop them. Why do we try to control what sick people spend their money on. TGA approval for treatments is good for common diagnoses and the establishment of what drugs are to be highly subsidised. However, it is not appropriate for illnesses in Group 4 where the illness is insufficiently defined to gather the supporting evidence.
3. **What is evidence based and who is interpreting what is evidence based?** Some of the treatments offered by integrative doctors are considered to be evidence based in other countries (such as Germany, USA) but not here. For instance, the range for disease free TSH in Germany has a lower cut off than here in Australia. In Germany my husband and daughter were considered to be hypo-thyroid but not here. When our integrative doctor treated my husband with thyroxin (very carefully and safely) he went from sleeping 18 hours per day to sleeping 12 hours per day. We were both aware that hypothyroidism was not his main problem, but the treatment made a big difference to his quality of life.
4. **In accordance with therapeutic guidelines.** After the Senate Inquiry into Lyme like illness, it was agreed that a team of medical professionals would develop guidelines for its treatment. My thoughts were that this is such a complex issue with so many variables and unknowns. Lyme like illness can be caused by varieties of Borrelia plus co-infections such as Babesia, Bartonella and Rickettsia. Each one needs different treatments, and each one has different ways of going dormant. Some people with Borrelia have an immune system which keeps it under control and others don't. Some have no symptoms until some kind of stress prevents their immune system from dealing with it and they become sick again after seemingly successful treatment. Guidelines can be good, provided they acknowledge the complexity and the need to treat different cases differently without hard and fast rules.
5. **Accepted treatments provided beyond the accepted indications.** See above – complex situations require more complex treatments, and accepted indications usually apply to the average person with a clearly defined illness, and do not cater well for flare ups when treatment was stopped too soon. This would apply to antibiotic treatments, and there are many cases where inadequate treatment for a particular person has a detrimental impact.
6. **Stem Cells.** I am not involved in this, but I would think that funding centres of excellence in two or more capital cities with enough doctors to service the Australian community, so that people with diseases such as MS which have some evidence of being improved in overseas studies, can be treatment earlier in their stage of disease progress. The centre of excellence

should be able to try out treatments which have the beginnings of evidence provided they are safe. If people have a centre of excellence they can get into, they are less likely to be travelling to places like Russia or backyard doctors for such treatments. The core of doctors in the centres should be documenting their experiences and eventually training other doctors to work in other cities. Do we really want Australia to be a backwater in medical treatment because we are too concerned that a treatment might be ineffective.

7. **Access to herbs, supplements and compounded medication.** If access to various herbal supplements and compounded medications is prevented or made more difficult, it would be harder for people with Lyme like illness to wean off antibiotics. The usual path when stopping antibiotics is to change over to herbal microbials, and if this pathway was removed or made too difficult, people would need to stay on antibiotics for longer. Compounding medications have been an important part of my family's treatments over the years. Compounded medications have been a way of obtaining a lower dose of something, or a gentler alternative to a pharmaceutical drug, or alternative means of administration.

Integrative doctors are GPs, not officially specialists, but they have a body of knowledge and skills which should be treasured by the medical profession. There is a high community demand for them, and people with long term ill-defined illnesses are terrified of losing their support because some of the treatments they provided, while sometimes only partially effective, are the only thing that makes their life tolerable. The medical profession should be made aware that suicide is one of the biggest risks for people who are so sick with illnesses which are not acknowledged.

My fear is that, with new guidelines specifically for integrative doctors and their alternative treatments, they will get sick of the increased red tape and intrusive scrutiny and will give up. After all, there are much, much easier ways of making money. I have seen this happen in the teaching profession where experienced high quality teachers retire/resign early because they are sick of the administrative load – the endless detailed report writing, the endless pointless scrutiny. What would my family do if we lost our integrative doctors? We would do whatever it takes to obtain the treatments which we have found worked for us – google searches, buying online, even smuggling. However, losing the medical supervision for these treatments would make them less safe and we would lose the guidance in new avenues of treatment. A lot of people travel overseas for treatments not available here, but my daughter is too sick to travel.

This submission is a cry from the heart for those with serious disabling illness who rely on integrative doctors and their treatments. If these doctors are not treated with more respect and support they will give up because it requires too much personal sacrifice on their part and they will opt for an easier life.

██████████, aged 77, resident of ACT.

PS.

My preferred option is option 1 (retain the status quo). No additional scrutiny should be necessary.

I think the medical board could consider a specialist status for integrative doctors. This would clarify the relationship between a patient's ordinary GP (mainstream) and their integrative doctor (who may reside in a different city.)

I think the medical board could look at way to make integrative treatments more affordable.



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**From:** [REDACTED]  
**Sent:** Sunday, 10 March 2019 10:35 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments

Re: Public consultation on complementary and unconventional medicine and emerging treatments

To whom it may concern,

I have recently been informed about the governments intention to regulate services in the Integrative Medical field. I'm am writing to you as a patient that has seen many benefits from the combination of conventional and alternative therapies for treatment for chronic anxiety disorder.

At 15 years old (I'm now 36) I was placed on the SSRI drug Aropax to 'treat' my symptoms of severe anxiety/agoraphobia. I was on it for nearly 13 years. In this time my body had built up a tolerance to the drug and withdrawal as well as trialing other treatments caused great distress and anxiety, far in excess to my original condition. I suffered multiple nervous breakdowns as a result of the treatment failure. I was very sick yet mainstream GP's either wanted to increase my dose (which would have only made things worse) or put me onto anther drug that wouldn't have treated the root cause of my symptoms. I found the medication would only act as a 'band-aid' to mask underlying issues. I knew I had to find another alternative.

By the Grace of God I was introduced to my current GP who uses natural/alternative treatments as well as conventional methods to treat his patients for a variety of issues. I'm currently on an Amino-acid protocol, developed in the USA, that has slowly restored my health and allowed me to improve my health. I went from being completely housebound to now being able to drive again and go out and about and claim back some of my life. I went from NOT being able to go to sleep for 2-3 days to now being able to get about 6-8 hours of decent sleep most nights.

My husband and I have spend a lot of our own money on these treatments as most of them are not covered by medicare, but the results have been worth every cent. I am certainly not the only patient who has benefitted from such treatments and therapies and I've loved to see them used more often. Patients should have the right to choose the treatments and therapies from the information provided that they consider are best for them. I just ask that you please consider mine and the thousands of other patients that rely of this field of medicine, to continue to have access to our treatments. I am worried that if these regulations are implemented it will greatly impact my choice as a patient.

Thank you for taking the time to read my letter of appeal,

[REDACTED]  
Integrative Medical Patient

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**From:** [REDACTED]  
**Sent:** Saturday, 29 June 2019 1:32 AM  
**To:** medboardconsultation  
**Subject:** Concern about changes

To Whom It May Concern,

I choose Option 1 no new regulations are required for doctors practising in the areas of complementary medicine and integrative medicine.

About twenty nine years ago I had began having extreme problems with my gut, I could not keep weight on and struggled to eat food without having a reaction. I saw many doctors and the issue was put down to Irritable bowel syndrome with no reason for this occurring. Gradually things got worse even though I limited foods eg dairy, MSG. Many other issues occurred - rashes on my face, back and through my hair; hair loss; severe gut pain; unable to sleep due to the pain, osteoporosis.

I tried alternative medicine with some assistance. Then 7 years ago someone suggested an Integrative doctor. After blood tests for many items it was found my zinc, B6 and magnesium were very low and my copper was high. From then I began taking supplements and gradually I began to feel normal. I started the journey back to good health and healing my gut. My integrative doctors have been my life savers before them I couldn't function normally. I now take supplements which replaces the nutrients which my body cannot absorb readily due to my malabsorption problems. They have taken time to gradually address all of my problems as the older I get the ramifications of not absorbing nutrients has taken its toll. My normal doctor is very supportive of me seeing an integrative doctor and I prefer these non-drug approaches as this is what my body requires. For twenty two years I had not had any success with normal doctors so I'm so thankful for the choice to use integrative doctors. As this is a hereditary condition my children have also been diagnosed and they should have the choice to see integrative doctors when they need to.

I feel there is no demonstrated need to regulate Complementary Medicine or Integrative Medicine. These are safe practices that need no further regulation. I do hope the changes will not affect our choice to use these doctors.

Regards  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, 7 April 2019 11:44 AM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

To The Medical Board of Australia,

I am writing to you today to provide feedback in regards to medical practitioners who provide complementary and unconventional medicine.

As a citizen and resident of Australia, I feel I should have the right to choose what methods I use to address my health issues. I have been suffering constant discomfort and issues throughout various parts of my body (including stomach, legs, breast, mouth) amongst other physical issues. Conventional medical doctors have not been able to successfully treat and find a cure to my conditions and bring me to a satisfactory outcome.

Using a G.P. prescribing pharmaceuticals and the use of conventional methods that simply did not work (and in some instances gave unwanted side-effects) seems to waste far more Medicare funds and resources.

Before I saw an integrative medical doctor, who included lifestyle change, diet and supplements to address my problems, my issues remained unchanged.

If I cannot see an integrative doctor, I feel that my health will deteriorate and have a continuing impact on myself, my family and my well-being. Moreover, I feel that my right to medical freedom is being taken away. I also feel it will be a step towards segregation and discrimination for the people of Australia who choose alternate medical methods.

Concerned citizen,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 10 April 2019 9:46 PM  
**To:** medboardconsultation  
**Subject:** Submission to the Medical Board of Australia

>  
> To The Executive Officer  
> My name is [REDACTED] I am 66 years old and live in New South Wales.  
> I am writing to voice my concern that there are at present proposals to create a strict new set of regulations governing the practice of " Complimentary and Unconventional and Emerging Medicine."  
> I have been interested in health and well being since I was 16 years  
> old, and over the course of my life I have been blessed with good health, but on the occasions I have been unwell, or ill, I have sought to consult with practitioners who have offered alternative therapies, as well as mainstream diagnostic tests, etc.  
> During the last six years, I have been involved in a long and  
> adversarial Family Court matter. This involved my daughter and my grandson, and we were trapped in this highly stressful legal maze, as well as the trauma that was experienced by us, due to Court Orders forcing my grandson to be separated from his mother to attend contact visits.  
> During this time, my health, and my daughter's health seriously deteriorated.  
> The prolonged, chronic and relentless stress on our nervous systems, and our bodies was dreadful.  
> If, over the last few years, we had not been able to consult with a Doctor who specialised in Integrative Medicine, I honestly don't know what our fate would have been.  
> I also was consulting with a GP, a person who I greatly respect, who is a very good Doctor, yet it was the Integrative Medicine Doctor who was really able to assist me back on to a path of health.  
> My health picture had become very complex and without the level of expertise and understanding of the Integrative Medicine GP, I know I would still be desperately searching for answers to my health issues.  
> I am enormously grateful and very happy with the availability of accessing this type of practice.  
> I have always been able to have helpful discussions about treatment options and their merits or potential problems. I have always been informed and considered in the creation of any individual treatment plans.  
> And I greatly value having the freedom to make these choices for my own health and well being. I had become chronically ill , and was not getting better. Due to my ability to chose my medical options for myself, and be able to access an Integrative Medicine practitioner, I am now becoming well again.  
> My preferred option is Option 1, to retain the status quo.  
> If the medical board decides to choose Option 2, for greater  
> regulation, that it be modified from the current proposal to ensure 1.  
> That it applies to ALL medical practitioners with the same onus of  
> exhaustive exposition of all treatment options, research, etc and 2. That the Board accept that Integrative Medicine, utilising Complimentary Medicine, as well as conventional medicine, be recognised as a Speciality, in order to allow increased Medicare rebates to help cover the increased costs of fulfilling the new regulations I sincerely urge you to consider the inequity of the proposed change to the regulations, and to acknowledge the important role Integrative Medicine practitioners perform, in treating those individuals with chronic health issues, emerging 21st century conditions, such as auto-immune responses, and complex health problems which are beyond the scope of even the most gifted of mainstream GP's.  
>  
> [REDACTED]  
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>

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**From:** [REDACTED]  
**Sent:** Tuesday, 9 April 2019 12:18 AM  
**To:** medboardconsultation  
**Subject:** To The Executive Officer.

To whom it may concern,

My name is [REDACTED] I'm 35 and live in N.S.W.

I am a single mother, I have a son who is on the autism spectrum.

I am his full time Carer.

I have used complementary medicine in my sons and my own health care and value it greatly and the positive role it plays in our lives.

I am happy with the information our doctors have given us in terms of discussing options for our individual treatments and our individual needs and also the benefits and possible problems. I have always felt informed and included in these open discussions. Our GP and my sons paediatrician have always provided us with an excellent level of care and I greatly value their time as it is so very important that I stay fit and healthy so I can best look after my son and his complex needs.

My sons health and so many aspects of his autism has been wonderfully addressed and supported by our doctors. My son has made so much progress in the past few years and not only is this fantastic for him and his future it is also his good health and well-being that makes my role as his mother and full-time carer so much more manageable, joyful and fulfilling.

I have a rare medical condition that has benefited greatly from the use of emerging medicine and I am so grateful that I was able to access complementary medicine as it has played a huge role in giving me my health back.

As a single mother of a special needs child it is very important for our health not only now but into the future that I am able to easily and affordably access these areas of emerging medicine that have given my family such relief and opened up so many possibilities for myself and my son.

My son and I are now thriving and our health has been enormously supported by the wonderful doctors and naturopaths that I have been able to access.

My preferred choice of outcome is: option 1, retain the status quo.

If the medical board eventually decides to choose option 2.

I would urge that it be modified from the current proposal, to ensure

1. That it applies to ALL medical practitioners with the same onus of exhaustive exposition of all treatment options, research etc and
2. That the Board accept that integrative Medicine, utilising Completely or Unconventional or Emerging Medicine, be recognised as a Specialty, in order to allow increased Medicare rebates to help cover the increased costs of fulfilling the new regulations.

I please ask that you retain the status quo (option 1.) as I know how much positive impact our current doctors have had on our health.

I would be happy to discuss this further if need be.

Kind Regards,

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 21 March 2019 12:48 PM  
**To:** medboardconsultation  
**Subject:** Freedom of choice

To whom it may concern

Please do not restrict the choices that I have by restricting natural / alternative medicine.

I currently go to a Dr who is very open to helping me stay healthy that doesn't include taking pharmaceutical medication and I would like to keep it that way !

I think that all Drs should have more knowledge about nutrition and natural alternatives .... this should be encouraged not punished!

The pharmaceutical companies have their place and so does natural / alternative medicine !

It shows you how far we have gone from nature when we have to call it "alternative " It is my right as a human to make choices about my body and my Dr should have the same rights and choices!

Sincerely [REDACTED]

Brown snake bite survivor - pharmaceutical medicine saved my life but left me in a mess it was natural alternative medicine that gave me my life back after I was then abandoned by Mainstream Drs

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**From:** [REDACTED]  
**Sent:** Saturday, 6 April 2019 1:02 PM  
**To:** medboardconsultation  
**Subject:** Regulation of Medical Practitioners

To whom it may concern,

I, [REDACTED], as an Australian citizen feel that I should have the right to choose which methods I use to address my chronic health issues.

I have been suffering from: Hashimotos & Pernicious Anaemia for nearly 30 years now.

I have been seen by specialist and GP's for my condition all these years with little or no results. I was taking the highest dose possible of thyroxin, as my thyroid had basically given up. As a last resort I consulted a integrative medical doctor about 5 years ago. She included in her treatment lifestyle change and diet change plus supplements. Please note I still consult my GP who also monitors my thyroid and can't believe the change. Since then I've been able to function normally running a very busy home plus working as an accounts clerk.

If I cannot continue to see my integrative doctor, I feel my health will deteriorate back to what it was. That is lying on a couch most of the day, unable to function normally. This naturally will have a huge impact on my family, my work and my wellbeing.

Kind Regards

[REDACTED]



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**From:** [REDACTED]  
**Sent:** Sunday, 16 June 2019 12:22 PM  
**To:** medboardconsultation  
**Subject:** Support for Integrative Medicine

I am a 68 year old female and have been a patient of an Integrative doctor for the past 5 years after diagnosis of breast cancer. During that time I have also had regular appointments with the breast surgeon and an oncologist. While both the surgeon and oncologist were professional, efficient and personable and I have no complaints about their service there was no scope to discuss or investigate any other issues regarding my overall health. I continued seeing a general practitioner during that time and still do for basic checkups or the occasional infection.

The Integrative doctor dealt with some serious side effects of the drug I was taking with professionalism and care, allowing the time for discussion and investigation through specific pathology testing. Some of the tests were looking at deficiencies that could lead to ill health. I believe that the Integrative doctor looks more broadly at a patient and also focuses on prevention of possible ill health. I believe this can reduce health costs for both patients and the health system. I see Integrative doctors as Medical specialists and value their place in the medical system. As such I believe that Integrative doctors should be covered by Medicare rebates and be supported in their continuing service.

Yours sincerely,  
[REDACTED] NSW

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**From:** [REDACTED]  
**Sent:** Wednesday, 10 April 2019 3:25 PM  
**To:** medboardconsultation  
**Subject:** Code of Conduct 2014 sent 10.4.2019

To Whom it may concern

I am writing to express my satisfaction with the current Code of Conduct.

My experiences are as follows.

I saw my naturopath who suggested sensibly that she thought my thyroid function needed checking by a doctor. I had a blood test and my female GP picked up that I had an underactive thyroid. She has prescribed both alternative vitamins and conventional medicine for this complaint.

Using more tests she also found out that I have a double dose (from both parents) of MTHFR and she prescribed more pills of an alternative type.

The regular bouts of depression which had dogged me for decades has largely disappeared.

I am therefore grateful for both naturopathy and a conventional medical doctor who uses other alternative pills at times.

I strongly feel that no changes need be made to the current Code of Conduct and that people should be free to choose both conventional and alternative types of treatment.

Yours sincerely

[REDACTED]



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**From:** [REDACTED]  
**Sent:** Monday, 18 March 2019 7:23 PM  
**To:** medboardconsultation  
**Subject:** Submission Medical Board of Australia

The Executive Officer  
Medical  
AHPRA  
GPO Box 9958  
Melbourne 3001

Dear Sir, Madam,

My name is [REDACTED] and I was born on [REDACTED] and I am a resident of NSW.  
I suffer from the serious illness Multiple Chemical Sensitivities which encompasses many chronic illnesses and I have used Complementary Medicine and I value its availability and am happy with its practise.  
I use mostly herbal medications when needed as I cannot take most allopathic drugs as antibiotics etc as these can cause serious side effects from which I may die.

My doctor provides discussions about options for treatment and their relative merits and potential problems.

My preferred choice of the outcome is Option 1 to retain the status quo.  
If the Medical Board eventually decides to choose Option 2 for greater regulation, then that this be modified from the current position to ensure that;  
a- it applies to all medical practitioners with the same onus of exhaustive exposition of all treatment options, research etc and  
b- that the Board accept that Integrative Medicine, utilising Complementary or Unconventional or Emerging Medicine as well as conventional medicine be recognised as a Speciality in order to allow increased Medicare rebates to help cover the increased costs of fulfilling the new regulations.

Yours sincerely,  
Signed; [REDACTED]  
Date; 18/3/19.

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**From:** [REDACTED]  
**Sent:** Sunday, 17 March 2019 4:36 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

To the Medical Board of Australia,

I wish to write in support of Option 1 - Retain the status quo of providing general guidance about the Board's expectations of medical practitioners who provide complementary and unconventional medicine and emerging treatments via the Board's approved code of conduct.

The proposed changes under Option 2 would leave myself and many others with under-recognised or poorly understood health conditions, with very limited treatment or management options. This could have a significant negative impact on our quality of life and illness trajectories.

Chronic Fatigue Syndrome/Myalgic Encephalomyelitis (CFS/ME) alone is thought to affect almost 4% of the Australian population (<https://emerge.org.au/mecfs/gets-mecfs/#.XI3YdSgzY2w>) and many are dependent upon complimentary or unconventional medicine and emerging treatments to manage the condition. The denial of complimentary or unconventional medicine and emerging treatments to these people would create significant burden on the health system, and see greater numbers of people dependent on human services and/or NDIS.

Regards,

[REDACTED]



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**From:** [REDACTED]  
**Sent:** Tuesday, 19 March 2019 9:29 AM  
**To:** medboardconsultation  
**Subject:** The MBA Proposal - please do not go ahead without considering the below

To whom it may concern

**Re the MBA redefining what is “safe” medical practice and deregulating medical practitioners who speak about “unconventional” practices.**

While I agree that there are some shonky operators of complementary medicine who need to be removed from the system, it is ABSOLUTELY CRITICAL that the redefinition not happen as currently proposed. Please please please do not do this.

We currently see a GP who also practices naturopathy and other complementary medicines who has produced AMAZING RESULTS FOR OUR 4 YEAR OLD GIRL AND THOUSANDS OF OTHERS due to her holistic approach combining standard MBA medicine with other forms. She will no longer be able to run her business. Our child and many others will suffer immensely.

My daughter had a serious eating disorder which led to serious learning difficulties and significant physical health issues. This holistic GP has made a massive improvement to the point that our daughter now eats all food types, has no learning difficulties and excellent physical health. This would ABSOLUTELY NOT HAVE BEEN POSSIBLE had your new regime already come into effect. There is no doubt at all that this holistic GP is 100% the cause of her improvement.

I would LOVE to have the opportunity to talk to someone about this before you go ahead. Please call me at any time on any day on [REDACTED] or email back.

Yours sincerely

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, 30 June 2019 6:07 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments  
**Attachments:** GENERIC LIST of DX March 19.docx

Dear Sir/Madam  
I choose Option 1.

I choose to use complementary medicine and integrative medicine because I have complex chronic diagnosed health conditions that are not treated or managed well by most other general practitioners. In 1996 my excellent GP told me, "[REDACTED], you have a very unusual body'" after receiving blood tests back, He did not know how to treat me.

I have attended excellent and caring integrative medicine doctors since then. Without them, I would be not functioning and in immeasurable pain. I am categorised as permanently disabled. My consultations are lengthy and can involve treatments as required.

My conditions are both genetic and neuroautoimmune and include:

**Diagnoses in no particular order**

**Asterisk denotes term is explained at the end of this section.**

**\*Ehlers-Danlos syndrome** [REDACTED] (geneticist) 2015  
[REDACTED] (rheumatologist 2015)

**\*Cancer: Lymphoma (CTCL)**  
[REDACTED] 2012 (dermatologist)  
[REDACTED] (dermatologist) 2012

**Grover's Disease**  
[REDACTED] 2015

**Gut dysmotility and food intolerances** [REDACTED] (dermatologist) 2015  
[REDACTED] 1995 (gastroenterologist [REDACTED])  
[REDACTED] 2016 (gastroenterologist [REDACTED])

**Gastroparesis**  
[REDACTED] (gastroenterologist)  
[REDACTED] 2014

**\*ME/CFS**  
[REDACTED] 1988,  
[REDACTED] 1985,  
[REDACTED] 2006  
[REDACTED], Mitochondrial Specialist [REDACTED] (2016)

**Mitochondrial Dysfunction**  
[REDACTED] 2012.  
[REDACTED] 2015  
[REDACTED] neurologist [REDACTED] 2016

**\*POTS/NMH/OI**  
[REDACTED] 1995,  
[REDACTED] 2006,  
[REDACTED] 2015

**Osteoarthritis**  
[REDACTED], Physiotherapist, fascia treatment  
[REDACTED], Physiotherapist Thumb joint specialist

**MCAS possible**  
[REDACTED] (2016)

**\*EDS** Ehlers-Danlos syndrome –type 3/hypermobility

**\*Lymphoma CTCL/MF** cutaneous T Cell Lymphoma, mycosis fungoides

**\*ME/CFS** Myalgic encephalomyelitis/chronic fatigue syndrome

**\*POTS/NMH/OI** Postural orthostatic tachycardia syndrome/Neurally mediated tachycardia syndrome/orthostatic intolerance

**\*MCAS/D Mast cell activation syndrome/disorder**

I work with my doctors to understand more about my illnesses and to discuss treatment options that are open to me. This way I can help myself and also help my family who is responsible for looking after me. I have been harmed many times by conventional medical treatment and this is never satisfactory for the doctor or for me. I am reactive to many conventional drugs and I am a patient whom many some doctors do not want to take me on because they feel they cannot help me. Currently I am on an absolute minimum of drugs which would not be the case if I did not have access to doctors who have the knowledge I seek and treatments that have been and continue to be vital to me.

I have concerns about the proposed regulations because there is no need for the regulation proposed; safety is the main concern and concerns about the effectiveness of my treatments should be my decision. After 38 years surviving this I am more skilled than most doctors I meet – often I have been thanked by these doctors for my communication with them about living with conditions that makes them wonder how they would cope; the Medical Board of Australia included members of the Friends of Science in Medicine, a political lobby group opposing Complementary Medicine and Integrative Medicine. This is a clear conflict of interest. The Medical Board of Australia should cancel the current consultation and go back to the start with all current and past members of the Friends of Science in Medicine lobby group excluded from Board participation; lack of transparency in the process. The Medical Board of Australia has acted in secrecy and FOI requests of the origin of these processes has been denied or redacted.

Australia can do better but our brightest and best doctors need to be future leaders; instead Australian medical practices will revert to being the laughing stock they were 40 years ago.

Kind regards

[Redacted signature]

During my recent bout of  
non Hodgson cancer & a  
knee replacement I used both ACP, CA, 2012

## How to make a submission to the MEDICAL BOARD of AUSTRALIA

REGULARLY

Individually written letters carry far more weight than a copied format. We thus ask you to write your own submission and to:

Email it to [medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

Or mail it to The Executive Officer  
Medical  
AHPRA  
GPO Box 9958  
Melbourne 3001



NB Send as soon as possible. Submissions are due to close on 12<sup>th</sup> April 2019

We suggest that in your submission you should:

- 1 State your name and age and state of residency
- 2 Make known your interest and concern and preferred outcome. Issues that you may specifically wish to mention could include:
  - YES a. That you have used Complementary or Unconventional or Emerging Medicine and that you value its availability and are happy with its practice.
  - YES b. That your Doctor already provides discussion about options for treatment and their relative merits and potential problems.
  - YES c. That you value free choice in making your decisions over your medical treatment.
  - d. That your preferred choice of outcomes is:
    - i. Option 1, retain the status quo
    - ii. That if the Medical Board eventually decides to choose Option 2, for greater regulation, that it be modified from the current proposal, to ensure

YES 1. That it applies to ALL medical practitioners with the same onus of exhaustive exposition of all treatment options, research etc, and

YES 2. That the Board accept that Integrative Medicine, utilising Complementary or Unconventional or Emerging Medicine as well as conventional medicine, be recognised as a Speciality, in order to allow increased Medicare rebates to help cover the increased costs of fulfilling the new regulations.

- 3 Please do not state the name of your own Integrative Medical Practitioner

Signed by .....

Dated .....

78 YES

NSW



## IMPORTANT NOTICE to all patients

*The Medical Board of Australia is proposing to create a strict new set of regulations governing the practice of "Complementary and Unconventional and Emerging Medicine"*

The effect of these proposed Regulations will be to significantly increase the burden of paperwork on Integrative Medical Practitioners, and so to increase the cost to patients of consultations. Furthermore, there is almost certainly going to be a reduction of medical practitioners willing to practice Integrative Medicine and there will be an increase number of cases to deregister practitioners who are willing to continue practicing in this specialised area of medicine.

The net effect of these regulations will be to increase the cost and reduce the free choice of patients to see registered Medical Practitioners for specialised advice and treatment with an Integrative medical approach using the best of both orthodox and natural therapies with the latest research.

The stated reason for making these changes is that there have been some complaints from some patients about the standard of care of a few particular practitioners. What is not stated is that these complaints are no more frequent, and generally with less severe outcomes, than complaints against other modalities of medical practice. There is also no case made for why such rare occurrences cannot continue to be dealt with under the existing guidelines for good medical practice.

The unstated reason stems from a bias against the use of non-pharmacological therapies, as well as against progressive ideas in emerging medicine, irrespective of the latest research findings. There are specific aims to limit the treatment of Tick-borne diseases such as Lyme disease, as well as to limit the use of Acupuncture and Stem cell therapies.

The new regulations will create a discriminatory regime of double standards within medical practice where one group of medical practitioners must practice under a stricter set of guidelines than the rest of medical practitioners.

We urge you to protect your rights, and especially the right of those of you who can least afford it, to have access to the medical treatment of your choice, including the professional and ethical use of Complementary and Unconventional and Emerging Medicine. The Medical Board has released a discussion paper and called for Public consultation and submissions to AHPRA. Follow this link:

<https://www.medicalboard.gov.au/documents/default.aspx?record=WD19%2f27929&dbid=AP&chksum=4BA8Vsiz0Pdd6%2fHOcv9NdQ%3d%3d>

We ask you to send a personal letter supporting the continuation of the current existing guidelines for medical practice to the Australian Health Practitioners Regulatory Authority as soon as possible (submissions close by 12<sup>th</sup> April 2019) You may also chose to send the same letter to your local member of the Commonwealth Parliament.

With much appreciation

Your Integrative Medical Practitioner

**Title: Submission to MBA consultation on complementary and unconventional medicine and emerging treatments.**

Our names are [REDACTED] and we are based in [REDACTED], we can be contacted on [REDACTED]

Two years ago our daughter, [REDACTED], was a healthy, happy young woman, with no history of health problems. She was employed by the [REDACTED], as the [REDACTED] [REDACTED] had a supportive family, a wide circle of friends, a successful career and played an active role in her community.

Shortly after staying in a friend's water damaged home, [REDACTED] developed a number of unspecified, multi-system symptoms. These escalated over time to the point where she became chronically fatigued, suffered from severe digestive symptoms, cognitive issues and hypersensitivity. Over the past two years her symptoms have included: nausea, dysphagia, irritable bowel, reflux, bloating, food intolerances, stomach cramps, severe weight loss, fatigue, cognitive issues, shortness of breath, dizziness, blurred vision and hypersensitivity to medications. She moved home to Australia shortly after her symptoms developed, mistakenly believing she would receive better healthcare at home.

[REDACTED] was eventually diagnosed with chronic inflammatory response syndrome (CIRS) or biotoxin illness as a result of exposure to toxic mould. Because it took over eighteen months for her to receive a diagnosis, she also developed the following co-morbid conditions: heavy metal toxicity, gastroparesis and multiple chemical sensitivity.

Before she came under the care of an integrative general practitioner, she saw over eighteen different health professionals who were unable to help. During this time, we watched, as [REDACTED] lost over twenty kilos and was unable to stabilize her weight loss, at her lowest point her body mass index was 13.

While trying to access adequate healthcare through Australia's mainstream medical system, [REDACTED] was prescribed a number of different medications and undertook several different tests. These medications and tests ranged from being completely ineffective to catastrophic to her health. The medications she tried during this period included: H2 blockers, proton pump inhibitors, non-steroidal anti-inflammatories, anti-fungals and painkillers. A gastroenterologist had her complete a number of invasive tests, including a barium swallow. This test induced her severe weight loss, food intolerances and digestive symptoms.

[REDACTED] kept detailed notes while her health deteriorated and spoke clearly and intelligently about her symptoms and condition. In spite of this, and even though her symptoms were clearly very physical, we watched as she was repeatedly dismissed, or questioned about her mental state by the general practitioners and specialists she saw. The treatment she received from mainstream medicine was unethical and negligent. We sat in many of these appointments with her and clearly saw her concerns being dismissed and her condition misunderstood.

[REDACTED] health started to turn around when she found an excellent integrative practitioner. Being based in [REDACTED], there were no integrative doctors on the [REDACTED] who were equipped to deal with the severity of her complex, chronic illness. As a result, she consulted with this doctor via zoom and he worked collaboratively with another doctor based in [REDACTED] who we could see in person.

The integrative practitioner listened to [REDACTED] experience and took a patient-centric approach to coordinating her healthcare. He took a very detailed health history and ordered a number of tests to identify the underlying issues contributing to her ill health. As a result of this testing, he was able to determine that mould toxicity was the underlying trigger and mercury toxicity was contributing to her

problems. Importantly, instead of trying to classify [REDACTED] condition, this doctor took an individualized approach to unravelling her complex health problems.

By the time [REDACTED] saw this doctor, she was extremely sensitive to any medications, supplements, chemicals and changes to her diet or food intake. As a result, this GP took the most careful, considered approach to [REDACTED] treatment. He supported her to trial one treatment option at a time and encouraged her to start everything in tiny doses because she was so hypersensitive.

Five months after she started consulting with this doctor [REDACTED] weight loss had stabilized and some of her most debilitating symptoms began resolving. The impact this had on [REDACTED] quality of life was immeasurable. As a result of his efforts her fatigue, cognitive issues, shortness of breath, dizziness and blurred vision have largely resolved. In real terms, this means she is able to participate more fully in life, spend time with my friends and maintain a professional career. While she has improved physically, the impacts on her mental health have been very positive, as she no longer feels hopeless, abandoned or socially isolated.

My husband and I watched in horror as our beautiful eldest daughter [REDACTED] was misdiagnosed time after time as her health rapidly deteriorated and we were unable to find anyone to help her. We could not understand how this was possible in a first-world country like Australia. The relief we all felt, on finding an integrative practitioner who was able to provide appropriate healthcare, was indescribable.

In [REDACTED] situation, where mainstream medicine did not have the knowledge, understanding or tools to provide appropriate healthcare, integrative medicine saved her life. She is passionate about sharing her story with others, and advocating for a change in the system. She has written about her story hereL

[REDACTED]

We strongly recommend that **option one** is adopted as part of this consultation, to retain the status quo of providing general guidance about expectations of medical practitioners who provide complementary and unconventional medicine and emerging treatments via the Board's approved code of conduct.

[REDACTED]

**Title: Submission to MBA consultation on complementary and unconventional medicine and emerging treatments.**

My name is [REDACTED], I am 33 years old and based in [REDACTED], I can be contacted at [REDACTED]

Two years ago I was a healthy, happy young woman, with no history of health problems. I was employed by the [REDACTED]  
[REDACTED] I had a supportive family, a wide circle of friends, a successful career and played an active role in my community.

Shortly after staying in a friend's water damaged home, I developed a number of unspecified, multi-system symptoms. These escalated over time to the point where I became chronically fatigued, suffered from severe digestive symptoms, cognitive issues and hypersensitivity. Over the past two years my symptoms have included: nausea, dysphagia, irritable bowel, reflux, bloating, food intolerances, stomach cramps, severe weight loss, fatigue, cognitive issues, shortness of breath, dizziness, blurred vision and hypersensitivity to medications. I moved home to Australia shortly after my symptoms developed, mistakenly believing I would receive better healthcare at home.

I was eventually diagnosed with chronic inflammatory response syndrome (CIRS) or biotoxin illness as a result of exposure to toxic mould. Because it took over eighteen months for me to receive a diagnosis, I also developed the following co-morbid conditions: heavy metal toxicity, gastroparesis and multiple chemical sensitivity.

Before I came under the care of an integrative general practitioner, I saw over eighteen different health professionals who were unable to help. During this time, I lost over twenty kilos and was unable to stabilize my weight loss, at my lowest point my body mass index was 13.

While trying to access adequate healthcare through Australia's mainstream medical system, I was prescribed a number of different medications and undertook several different tests. These medications and tests ranged from being completely ineffective to catastrophic to my health. The medications I tried during this period include: H2 blockers, proton pump inhibitors, non-steroidal anti-inflammatories, anti-fungals and painkillers. A gastroenterologist had me complete a number of invasive tests, including a barium swallow. This test induced my severe weight loss, food intolerances and digestive symptoms.

Unsurprisingly, with my professional background in communications and media, I kept detailed notes while my health deteriorated and spoke clearly and concisely about my symptoms and condition. In spite of this, and even though my symptoms were clearly physical, I was repeatedly dismissed, or questioned about my mental state by the mainstream general practitioners and specialists I saw. The treatment I received from mainstream medicine was unethical and negligent.

My health started to turn around when I found an excellent integrative practitioner. Based in [REDACTED] [REDACTED] there were no integrative doctors on the [REDACTED] who were equipped to deal with the severity of my complex, chronic illness. As a result, I consulted with an integrative doctor via zoom and he worked collaboratively with another doctor based in [REDACTED] who I could see in person.

The integrative practitioner listened to my experience and took a patient-centric approach to coordinating my healthcare. He took a very detailed health history and ordered a number of tests to identify the underlying issues contributing to my ill health. As a result of this testing, he was able to determine that mould toxicity was the underlying trigger and mercury toxicity was contributing to my problems.



Importantly, when my condition didn't fit into a neat little box, this doctor dedicated himself to investigating my complex problems. He took an individualized approach to my case, acknowledging that every patient requires a different, personalized approach.

By the time I saw this doctor, I was extremely sensitive to any medications, supplements, chemicals and changes to my diet or food intake. As a result, this GP took the most careful, considered approach to my treatment. He supported me to trial one treatment option at a time and encouraged me to start everything in tiny doses because I was so hypersensitive. Every action we took was carefully discussed and considered, to ensure the benefits outweighed the risks. This is in contrast to my experience with mainstream medicine, where very little consideration was given to how medications or tests could potentially make my condition worse.

Five months after I started consulting with this doctor my weight loss stabilized and some of my most debilitating symptoms began resolving. The impact this had on my quality of life was immeasurable. As a result of his efforts my fatigue, cognitive issues, shortness of breath, dizziness and blurred vision have largely resolved. In real terms, this means I am able to participate more fully in life, spend time with my friends and maintain a professional career. While I have improved physically, the impacts on my mental health have been very positive, as I no longer feels hopeless, abandoned or socially isolated.

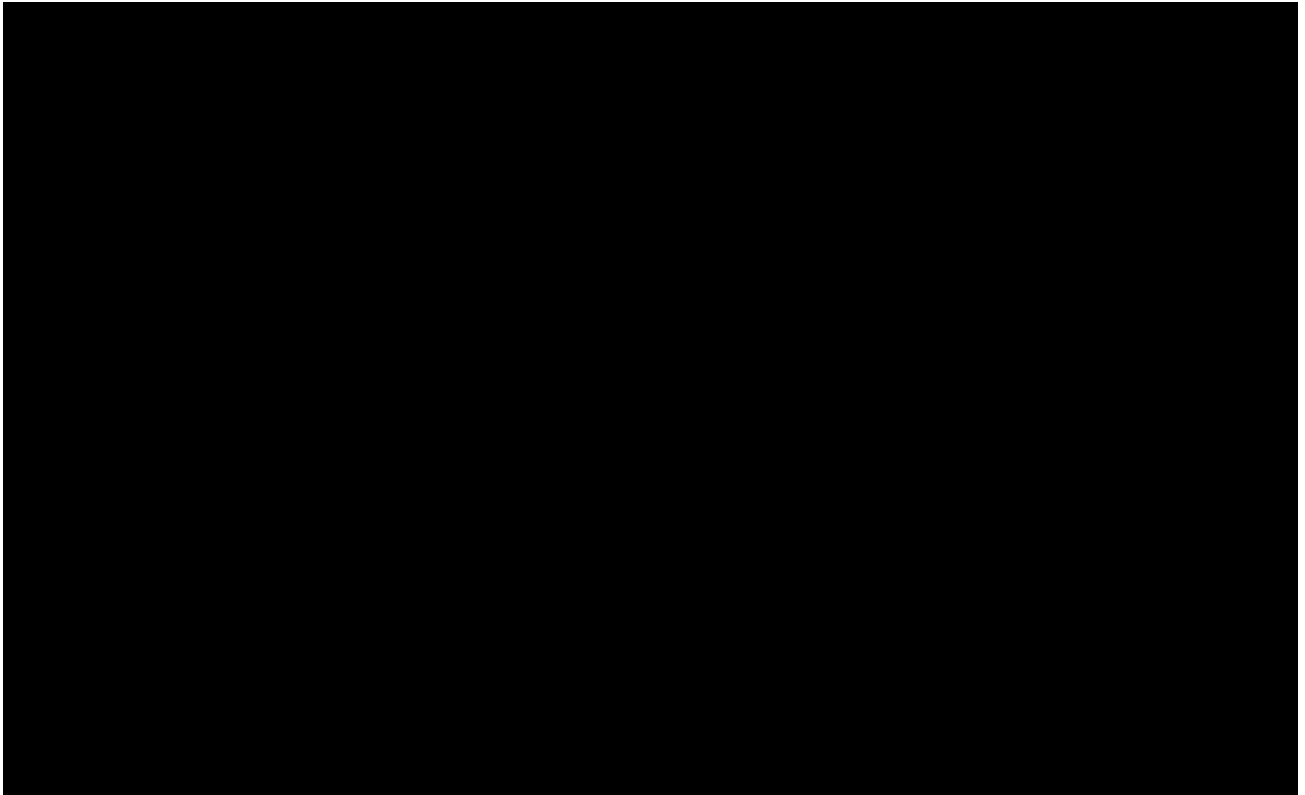
I can't speak for my family and friends, but I know that it was terrifying for them to watch as my health deteriorated so rapidly. My parents in particular, could not understand how it was possible for me to receive so little appropriate medical help in a first-world country like Australia. The relief everyone felt, on finding an doctor who was able to identify what was wrong, and provide appropriate healthcare, has made an enormous difference to our family.

In my situation, where mainstream medicine did not have the knowledge, understanding or tools to provide appropriate healthcare, integrative medicine saved my life. I believe all doctors should be educated to understand environmental illness and complex, chronic health conditions, as part of their medical training. Every Australian, regardless of their financial position, deserves access to basic healthcare. If the doctors I saw when I first became ill, were equipped to recognize and treat environmental illness, my life would be completely different today, because my illness would have been diagnosed and treated early on, instead of being left to spiral out of control.

I am passionate about sharing my story with others, and advocating for systemic change. I have written about my story here: [REDACTED]

I strongly recommend that **option one** is adopted as part of this consultation, to retain the status quo of providing general guidance about expectations of medical practitioners who provide complementary and unconventional medicine and emerging treatments via the Board's approved code of conduct.

In addition, I encourage the Medical Board of Australia to take a proactive approach to improving patient outcomes for the large number of Australians suffering from environmental illness. This would be a positive use of their time, energy and resources and I believe, would contribute to future-proofing Australia's healthcare system.



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**From:** [REDACTED]  
**Sent:** Sunday, 30 June 2019 2:30 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

I choose Option 1..I don't believe that any new regulations are required in order for doctors to practise in the areas of complementary medicine and integrative medicine.

It is important to me to be able to be involved in my medical care. I want to be able to choose a doctor that can take the time required in consultations .to understand all aspects of my medical needs. I have found that my integrative medicine doctor is well able to do this. This, combined with the additional medical training that my integrative medicine doctor has, gives me the type of care that is best suited to my needs.

Where possible, I prefer non drug approaches for managing my health or any illnesses. I find that an integrative medicine doctor is best suited to my needs in this.

For simple treatments where a brief consultation is appropriate I am happy to go to my GP. However when it comes to deeper health needs, and prevention I find that my integrative medicine doctor is much more able to meet these needs. This is both from a time perspective and a knowledge perspective.

Over many years, and when raising my children, I experienced times when my GP did not have any answers or treatments that were applicable to the situation. My integrative medicine doctor is much more equipped in these situations to work through what is going on and come up with a suitable treatment plan.

One example of this is when I had a ten year old who was unable to stand or walk for six months. After my GP and the hospital ran many tests they were unable to discover the reason why and had no other treatments or support to offer. With the help of complementary and integrative medicine my child was able to overcome this problem. To this end it is very important to me that my integrative medicine doctor is able to continue to practice without any further restrictions being placed on them.

I find that with the support of my integrative medicine doctor I am able to achieve a greater level of health than without that support. I am unable to gain that type of support in a 10 minute GP consultation.

The proposed regulations concern me on a number of fronts. Complementary medicine and integrative medicine are safe practices. There is no need for any greater regulation than currently exists. There is no evidence that shows a need for any further regulation.

Safety is the only concern of the Medical Board of Australia. There is no issue of safety here. How effective others feel complementary medicine and integrative medicine are should not be an issue for the Board. It should be up to me to decide what type of practitioner I

choose to attend. It is important to me that integrative medicine doctors are still available for me to choose them when i desire.

I have not been able to find any clear and valid reasons why the Medical Board of Australia wants to have these new regulations. I find the lack of openness around this very concerning.

Again I would like to say that I choose option 1. I believe that it is my right to be able to choose the type of medical services that are best suited to me. Many times I have found that that is an integrative medicine doctor.

[REDACTED]



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**From:** [REDACTED]  
**Sent:** Thursday, 27 June 2019 10:32 PM  
**To:** medboardconsultation  
**Subject:** I CHOOSE OPTION 1

To whom it concerns,

I choose Option 1: no new regulations are required for doctors practising in the areas of complementary medicine and integrative medicine and I do not accept the whole idea of the proposed regulations.

The Australian medical system failed me when I was very sick and I was forced to seek help from integrative medicine and complimentary therapies.....I even spent in excess of 40k going overseas for the help of integrative doctors and with all the help and recommendations and treatments from all these modalities I finally recovered and became well and and healed. My life is now beautiful, thanks to alternative, integrative, complimentary medicine.

I have concerns about the proposed regulations because there is absolutely no demonstrated need to regulate Complementary Medicine or Integrative Medicine. These are safe practices that need no further regulation.

The people of Australia deserve the right to choose how they are treated when in a health crisis.

I trust the right decision will be made here we deserve it.

Regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 4 April 2019 10:39 AM  
**To:** medboardconsultation

### Medical Board Submission

As an Australian citizen/resident I feel it's important that I have the freedom of choice in the type of medical care that I use to address my chronic health issues.

I have been suffering from : Chronic Menopausal Symptoms

Conventional medical doctors have not been able to successfully treat my condition(s) and bring me to a satisfactory level of health.

Pharmaceuticals and the use of conventional methods simply did not work (and in some instances also delivered unwanted side-effects in my case) and, seemed to waste Medicare funds and resources.

It was only when I saw an integrative medical doctor who included lifestyle change, diet and supplements of vitamins and minerals to address my problems that my condition began to improve.

If I cannot see an integrative doctor, or the Doctor is restricted in what he or she is able to prescribe for me, I feel that my health will deteriorate and have a continuing impact on my family, my work, and my wellbeing.

Additional notes:

I don't believe the Government has the right to deny us the opportunity to choose alternative medicines, unless they are being paid off by the big Pharmaceutical companies for their own greedy agendas. Pumping the people full of addictive drugs to keep the population medicated???

Concerned,

Name:

[REDACTED]

Signature:

\_\_\_\_\_

Date:

\_\_4\_\_/\_4\_\_/\_2019\_\_

Occupation:

\_\_\_\_\_(optional)

Please submit to:

[medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

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**From:** [REDACTED]  
**Sent:** Sunday, 9 June 2019 8:52 PM  
**To:** medboardconsultation  
**Subject:** Submission on Consultation on complementary and unconventional medicine and emerging treatments

Dear members of the MBA,

I am writing to you with personal concerns regarding the 'Consultation on complementary and unconventional medicine and emerging treatments' that is currently taking place.

I am deeply concerned that if the proposed new guidelines are adopted, a two-tiered system may arise that threatens Integrative Medicine (IM) and unreasonably targets practitioners. My concerns extend to the following:

- The grouping of integrative medicine with 'unconventional medicine' and 'emerging treatments' may create the impression of being "fringe" rather than evidence-based
- That many of the terms used in the rationale such as 'unconventional medicine', 'inappropriate use' and 'emerging treatments' leads to ambiguity and uncertainty
- That the term 'complementary medicine' also includes access to traditional medicines
- No evidence produced in the discussion paper quantifies risk in practicing complementary or integrative medicine vs 'conventional' medicine
- That there was NO consultation with the Integrative Medicine or complementary medicine community before the document's release
- That the current Good Medical Practice: A Code of Conduct for Doctors in Australia already adequately regulates doctors' practise and protects patient safety. There is no need or justification for a two-tiered approach
- That the right of patients to determine their own medical care is under threat
- That the lack of clarity on how to determine what is 'conventional' versus 'unconventional' can be misused by people with professional differences of opinion which results in troublesome complaints

Why do I care?

Four years ago i suffered from severe digestive problems including chronic reflux which left me seriously ill. After consulting several GP's and no progress I was recommended to my Integrative Medicine professional, who recommended me for tests for Pyrrole disorder. The results came back supporting his suspicions and he immediately prescribed me daily supplements which brought me back into balance and completely cured my chronic illness. My IM doctor cured me and saved me from a life of pain and misery. My point in writing to you is to highlight the scientific, research-based investigations my IM doctor undertook in sending me for highly specialised tests for a condition that other GP's had no knowledge of.

There was absolutely nothing unconventional about my IM doctors approach, he used sound, scientific medical experience to diagnose and treat my illness. The phrase Integrative Medicine describes his open mind and enormous experience in treating a condition other doctors did not even recognise with specialised tests at established pathologists, a methodology which was neither 'emerging' or 'unconventional'.

My IM doctor saved me and if a two-tier system is adopted, others who need help in seeking robust, research-based alternatives may not be so fortunate.

Regards  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, 8 April 2019 8:41 PM  
**To:** medboardconsultation  
**Subject:** 'Consultation on complimentary and unconventional medicine and emerging treatments'

As an Australian Citizen I should have the right to choose who and what methods I use to treat my health issues.

I have been a clear example of what happens when a Doctor just prescribes drugs to fix health issues.

Approximately 5 years ago I went to my local G.P. with reflux. I was prescribed some tablets, although they did help with the reflux, I started to show other symptoms, I had constant joint pain, after seeing the Doctor again and with another set of tablets, I continued with both lots. It wasn't long before more symptoms and more tablets continued. Until I felt I was having a breakdown, and was in tears all the time. Not the type of condition a working 60 year old at the time needs. By this time I was on tablets for reflux, tablets for joint pain, tablets for erectile disfunction and now looking at tablets for my nerves.

After seeing an integrative Doctor, and a change of diet I now take no tablets at all, had this not have happened who knows what I would be treated for by now, with the amount of medication no doubt something for a stomach complaint if not stomach cancer.

This type of medicine is not caring for the people of Australia, it is making them sicker. This then is putting further pressure on a health care system that is already at its limits. The only ones benefiting from this is the Doctors and the pharmaceutical companies.

If I could not see an integrative medical practitioner I feel my health would deteriorate, impacting on all aspects of my life.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, 7 April 2019 5:37 PM  
**To:** medboardconsultation  
**Subject:** "Consultation on complementary and unconventional medicine and emerging treatments"

As an Australian citizen I feel I have the right to choose what methods I use to address my own health conditions.

Using G.P. prescribed pharmaceuticals and conventional methods that simply do not work, with many of them giving unwanted side effects , that just lead to more drugs and more side effects.

these methods do not have our countries health and well being at heart, they are only wasting far more of our National health schemes resources, by using more of the money allocated for Medicare,

and filling our Doctors waiting rooms and hospitals with people, who started out with minor complaints, that in a lot of instances, could have easily been treated by a integrative Doctor, thus eliminating all the side effects ,

that are common with pharmaceuticals.

Many years ago, I was extremely sick, and after spending at least 18 months, trying to find a Doctor who would listen, and not just prescribe packet after packet of useless drugs, I finally found an integrative medical practitioner,

who not only listened, discovered that I was suffering from an overload of mercury. I had my amalgam fillings removed and treated with natural medicines.

Had I not found this Doctor I feel I would still be in the debilitating state I was in, and no doubt on welfare as I was unable to function. Not only did the condition cause me a great deal of pain and discomfort,

I also suffered from depression, mainly due to the fact that after each trip to a Doctor I felt that I was not looked at as a patient but just dollar signs from both the Doctors and no doubt the Big drug companies.

I find it very hard to understand how Australian medical professionals can even think that this type of medicine should be removed, and our choices taken away from us. As the rest of the world embraces

integrative medicine we are trying to remove it. Is this showing that our decision makers for the health and well being of this countries population are ignorant to the changing face of medicine or just plain arrogant.

Concerned Citizen

[REDACTED]

**From:** [REDACTED]  
**To:** [medboardconsultation](#)  
**Subject:** Urgent  
**Date:** Friday, 29 March 2019 4:04:45 PM

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I speak for those of us who would be too sick to work without the help of conventional medicine. PLEASE READ ON.

In my late thirties I developed the tick borne illnesses, Rickettsia and Lyme's disease and despite a positive reading on my initial test, through antibiotics and herbs, my integrative doctor was able to clear the bacteria out of my body and get a negative reading on the Rickettsia, tick born illness. I would be unable to work without the help of this Integrative doctor.

As a child I was given too many antibiotics which affected my immune system. In high school I developed Glandular Fever and Chronic Fatigue which only an Integrative Doctor was able to cure.

The most positive experience of conventional medicine was during the birth of my first child. I was extremely grateful for the invention of epidurals and induction drips and the fact that they could be given simultaneously! I had a wonderful experience of giving birth to my first child and I'll be forever grateful to conventional medicine for that.

My twins (boy and girl) reacted badly to their immunisations. Both got blood in their poo right after the immunisations and my son's severe reaction to the immunisations occurred after the twins weaned themselves. His head circumference went from 25th percentile to 75th percentile in 6 weeks.

Thankfully my Integrative Doctor came to the rescue and insisted that I relactate. I am so grateful for the provision of having my Integrative doctor discover the way to get my son on the pathway to have a natural, normal and healthy digestive and neurological function.

I'd like to talk to you in person as your policy if carried out in entirety will destroy my health and my son's health.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, 30 June 2019 3:53 PM  
**To:** medboardconsultation  
**Subject:** Consultation on contemporary and unconventional medicine and emerging treatments

I strongly believe there is a place & need for both traditional western medicine which with advanced scientific research treats medical symptoms & traditional eastern medicine which with hundreds of years of authentic tradition treats the cause.

In particular my daughter, myself & my whole family benefit from Integrative health professionals.

Eldest daughter has a history of difficult to manage anxiety manifesting in the form of anorexia & OCD from age 12-19

3 hospital admissions

Adverse reaction to anti depressants -Zoloft, fluvuxotine, sertraline, fluvuxotine & anti psychotics - olanzapine ... lucky to be alive

Suicidal for 2 years 17-19 on a small dose of Zoloft

At age 19 Life turned around when we found an integrative health professional who had the thorough education in many modalities. I put the success of the treatment down to her ability to treat my daughter holistically - by communication/ connection/ the trust she built/ quality supplements & herbs. The treatment started with long consultations & is now very much self managed with herbs & supplements, no pharmaceutical medication has been needed. Only out of adverse reaction experiences @ a very young age did we know that medication was not a solution for her due to resulting unsafe emotional & physical behaviours. Saying that I believe in many anxiety/ depression cases, the right medication can be beneficial in helping mental health however optimal is short term then weaning if a person has had good support & learned how to manage their condition.

I strongly disagree with taking away freedom of choice for Health in a democratic country.

Becoming fully informed and educated in all healthcare modalities will minimise fear.

Take money, profit and greed out of the equation and may the Medical Board's true heartfelt intention be to help all people to be well rippling out to community & country.



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**From:** [REDACTED]  
**Sent:** Friday, 28 June 2019 9:19 AM  
**To:** medboardconsultation  
**Subject:** My concerns

Dear Sir/Madam,

I have very serious concerns with the new laws and regulations starting to circulate around the integrative medicine. I have a son who has been suffering for many years with serious health issues and the "conventional medicine" was unable to help us. After spending over \$26,000 one year to try to get to the bottom of his condition we did turn to integrative medicine and it helped us with managing his symptoms and gave him some better quality of life. I am seriously disappointed with the recent changes and attacks on integrative medicine and my serious concerns are below:

- The grouping of integrative medicine with 'unconventional medicine' and 'emerging treatments' may create the impression of being "fringe" rather than evidence-based
- That many of the terms used in the rationale such as 'unconventional medicine', 'inappropriate use' and 'emerging treatments' leads to ambiguity and uncertainty
- That the term 'complementary medicine' also includes access to traditional medicines
- No evidence produced in the discussion paper quantifies risk in practicing complementary or integrative medicine vs 'conventional' medicine
- That there was NO consultation with the Integrative Medicine or complementary medicine community before the document's release
- That the current Good Medical Practice: A Code of Conduct for Doctors in Australia already adequately regulates doctors' practise and protects patient safety. There is no need or justification for a two-tiered approach
- That the right of patients to determine their own medical care is under threat
- That the lack of clarity on how to determine what is 'conventional' versus 'unconventional' can be misused by people with professional differences of opinion which results in troublesome complaints.

I would like to stand by my belief that there is place on all traditional and natural medicine and conventional medicine and medicine should integrate all treatments available based on the individual needs of a person requiring the treatment.

Warm regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 28 June 2019 8:07 AM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

To whom it may concern,

I am writing regarding the consultation on complementary and unconventional medicine. I have significant concerns that the guidelines threaten my ability as a consumer to engage in evidence-based, traditional, holistic and integrative medicine that have helped me so much in managing my chronic illnesses, that "mainstream" medicine were not able to help me at all with, despite years of multiple doctors and multiple "maintstream" modalities.

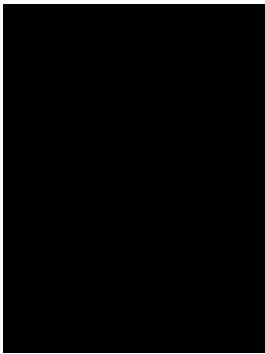
My specific concerns are:

- The grouping of integrative medicine with 'unconventional medicine' and 'emerging treatments', which may create the impression of being "fringe" rather than evidence-based;
- That many of the terms used in the rationale such as 'unconventional medicine', 'inappropriate use' and 'emerging treatments' leads to ambiguity and uncertainty of all, and is misinforming;
- That the term 'complementary medicine' also includes access to traditional medicines;
- No evidence produced in the discussion paper quantifies risk in practicing complementary or integrative medicine vs 'conventional' medicine;
- That there was NO consultation with the Integrative Medicine or complementary medicine community before the document's release - this is disgraceful, as all stakeholders have a right to submit consultation and have input into the development of a system that impacts them and their customers (of which I am one);
- That the current Good Medical Practice: A Code of Conduct for Doctors in Australia already adequately regulates doctors' practise and protects patient safety. There is no need or justification for a two-tiered approach;
- That the right of patients to determine their own medical care is under threat;
- That the lack of clarity on how to determine what is 'conventional' versus 'unconventional' can be misused by people with professional differences of opinion which results in troublesome complaints - the reality is that the medical community does not agree with each other within their own areas of speciality and expertise - let alone the expectation for the whole medical community to be in wholesome agreement across the board over other medical and alternate medical professions. We should not be trying to silo people of differing professions, and allow consumers to make decisions based on what is right for their individual circumstances.

My rights as a consumer of various medical approaches (including mainstream medicine), creating an integrative medicinal approach have helped me immeasurably. Please don't make it harder for me, my family and friends, as well as your family and friends to access the tailored help they need.

Warmest Regards,

[REDACTED]



[Redacted text block]

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**From:** [REDACTED]  
**Sent:** Friday, 28 June 2019 12:15 PM  
**To:** medboardconsultation  
**Subject:** MBA consumer submissions

**Dear sir,**

I am a nurse and a patient who has used complementary therapies. I understand u r currently accepting submissions about their use and how much GP 's are involved in this .

I strongly support option 1!

This is for several reasons . ...

1/ at work I experienced a life threatening injury. This also had some medical complications surrounding it which no specialist (and I saw many) picked up, they kept blaming the injury or finding other weird excuses which were completely wrong and wasted a lot of my time and money. If it was not for a naturopath, I would not be here today! Not only that with a variety of alternative treatments I am far better than anyone ever thought I would be ! Many of these were suggested by my GP! To whom I am forever grateful!

2/ like all practitioners there are some good and bad complementary therapists, if u have a GP who has an interest in this area, they can guide their patients to quality care and warn them when they see something potentially dangerous and know when to report dangerous practices which the patient won't be aware of! They also know more about the complementary medications, their side effects and drug interactions, which is really helpful.

3/ patients who see Specialist and GP's who use or have good knowledge in alternative therapies are more likely to open about their treatments. If u have a GP who scoffs when the patient says they r trying ... or taking .... will likely get the patient to close up and either the patient won't tell them they are trying something different . This can then cause unknown drug interactions . From a nurse perspective it also causes patients to be less trusting and have less respect for their doctor!

4/ I for one would not see a specialist or a GP not open to the option of complementary medicines and treatment as many treatments now have good research around them. Half of them have developed because western medicine either had no answers or refused to admit the condition even existed. Eg. Chronic fatigue, IBS and SIBO. Why be so Arrogant to ignore evidence based research just because u did not learn about it at med school?

I travel 40 mins each way just to see an integrative GP. They r so popular now, that many have waiting lists ! It is what patients want.

5/ complementary therapies play a massive part in chronic pain therapy these days now we have finally realised narcotics are not the answer for long term pain relief !

6/ after all herbs are where our western drugs come from in the first place !

7/ people have a right to choose what sort of medicine and treatment they would like. Having a doctor direct and guide these decisions is vital! Some patients get the wrong advice and then in ignorance choose some way out unproven extreme treatments . It is far easier to steer these patients in the right direction if u can meet them half way.

We need to keep the status quo and I reject a separate set of guidelines for doctors using and recommending complementary therapies! We need to support doctors using or recommending complementary therapies. A lot of hard work goes into training doctors ( well the ones in my hospital anyway) getting them to justify every choice they make, to think critically to understand which is a good research paper and what is not. If u think more guidelines are needed for them to make decisions on this perhaps u should reassess your training. They r like children, if u teach them well and they have understood . The ground work is set for life. If u make the guidelines too strict, patients will be driven away from western doctors and move towards solely alternative treatments , which we all know can sometimes be disastrous!

Thank you for reading my email, and considering my point of view.

I wish you well

Kind regards

[Redacted signature]

[Redacted contact information]

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**From:** [REDACTED]  
**Sent:** Sunday, 30 June 2019 8:48 PM  
**To:** medboardconsultation  
**Subject:** Alternative and emerging medicine

Having contracted a severe chemical insult in the workplace I consulted several eminent medical professionals who gave no positive outlook at the time or on going I was far from pleased and after some consideration consulted a group of practitioners who employed alternative therapies the outlook was good and I made a reasonable recovery from what mainstream medicine deemed to be a lost cause and for which they offered no positive outlook. I wish to advise that without the wisdom of the group of alternative treating Doctors I would have suffered a very agonising demise. I was indeed extremely displeased to note that one of the initial Dr that was consulted appeared on TV recently and urged the removal of many so called alternative medicines from sale along with the treating professionals that use these techniques which flies in the face of ancient tried and true traditional Chinese medicine and Homeopathy, that has served HRH Queen Elizabeth 2nd and her family and for many decades and I suggest that these alternative treatments remain on sale without fear of reprisal from mainstream Medicine which appear to view such things through a very narrow tunnel indeed and I suggest that the inquiry gather information from people who have been dismissed by mainstream medicine and that have fallen by the way side as a result. Signed [REDACTED]

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**From:** [REDACTED]  
**Sent:** Saturday, 16 March 2019 2:51 AM  
**To:** medboardconsultation  
**Subject:** Public consultation on clearer regulation of medical practitioners on complementary and unconventional medicine and emerging treatments

To whom it may concern

i will do the best i can with this but having ME myself presses me to respond. I have had ME for over 30 years and no treatment has come my way so i feel this consultation is very backward. Most of my progress over the years has been due to herbalism. I am a self taught herbalist and have worked for herbalist/natural practitioners in the past. I did this before i had ME so was versed in what to do after the initial period where i was bedridden for a few years. At that point i could do nothing as i was not verbal during that time or able to get about to access anything. Once i started to be able to and access the welfare system as the money/saving ran out i proceeded to getting a diagnosis(had vaguely heard of ME but they were investigating a few other things back then)....as i said befo0re there was no treatment. I was offered skin prick tests and a diet change. I did all of that and it made some difference but not much. Most of my progress has been when i worked in exchange for treatment for a herbalist that also at that time taught at a couple of natural therapy schools. I was very poor at the job but started to make progress with the herbal formulas her gave me. After 6 months i could read leaflets again and after a year i could form logical sentences when talking. My digestion started to improve and so many other things. I am far from any cure but having a quality of life is my goal. I also started physiotherapy some years ago, cycling with an ebike and doing some pilates with a machine that i purchased. I have had extensive training in pilates prior to getting ME, i pushed the GP to get me into physio for a few weeks to teach muscles to work again after being bedridden for 10 years and eventually the ebike got me about. I had numerous obstacles during this time which started about 9 years ago. All this comes with a lot of pain and is not achievable with everyone that has ME. Yes now with the internet and social media us patients do talk to each other. I find this who document a travesty. I have been poo poosed on numerous occasions by doctors about my use of herbal products and yet you all offer nothing? For the pain, for the impairment, for anything. I dont take synthetic preparations though as i have the tendency for infections, reactions or thrush. Noth that anything is ever offered. In 30 years!!!! So this whole restriction is ridiculous. I know there are doctors out there that are practicing herbalism or other forms of natural therapies on patients that have ME and i applaud them. I wish one of them had a practice near me so i could access them. In closing how do expect people to have a better quality of life or get well if you restrict a doctor? Doctors are supposed to heal.

[REDACTED]

To whom it concerns,

I have used integrative medicine (IM) since 2016, and would be in a much worse-off state today if it was not for my integrative Doctor, who delved into my health issues from a holistic perspective, and found an underlying thyroid disorder that was not picked up by **2 Endocrinologists**. I was told by one endocrinologist that I was “just fat now”, after I had gained 12 kilograms in 3 weeks, which is a clear issue. Their only option was to prescribe phentermine for weight loss, despite me knowing that there was something else affecting me. They refused a fT3 and fT4 blood test, despite a family history of hypothyroidism, as my TSH was “within range”. It was only after my integrative practitioner ordered these tests that I was diagnosed with severe hypothyroidism. This month I have finally been deemed euthyroid, after trialling many different doses of thyroxine, and subsequently having to be prescribed compounded T3. I do believe that the therapeutic guidelines should be followed in all patients, but it is when these guidelines fail that integrative medicine, such as compounding T3 can save lives. I do not plan on ceasing the services of my integrative medical practitioner, and would be at a serious loss if I had to do so. I use these health services alongside conventional doctors and specialists, and have found the most benefit from doing so.

As a final year pharmacy student, I have a vast array of knowledge in regard to medications and disease states. I strongly believe that IM and IM practitioners have a strong role to play in the diagnosis and treatment of patients in our health system. I believe that finding the root cause of issues, as most IM doctors do, can lead to better outcomes for patients, and for the health care system as a whole. It is well-established that prescribing cascades are commonplace in every day medicine. Although sometimes unavoidable, I do believe that there are many cases in which they can be avoided, and that by finding the root cause of health issues, patient and PBS money can be saved.

In addition to this, HCPs are taught to “treat the patient, not the number”, and personalising medications (via. compounding and other non-conventional methods) can achieve this, while still providing the appropriate evidence-based health care.

I do believe that IM has a strong place in our health care system, and that it should complement the work of primary health care professionals. I do not believe that it should replace conventional medicine altogether, but IM practitioners should not be penalised for the work they do alongside other health care professionals.

Another point which may be of interest is the plague of social media influencers who have NO qualifications yet claim to be “holistic health experts”. In my opinion, it is THESE people who need regulating – the people who have direct contact with the public and youth of today. They are sponsored by companies for many of their posts and cite YouTube as “research”. They have no scope of practice, and thus seem to have free reign on what content and “advice” they produce and put out to the public.

If a medically trained professional expands their body of knowledge and provides IM, I believe that they have the skills and awareness to do so. It is the people on Instagram and YouTube with over 1 million vulnerable followers who are the real issue, and I believe that this is where the attention of the Board should be focussed.



I am looking forward to working within my scope of practice as a Pharmacist, and am eager to do so alongside IM practitioners, in order to provide holistic health care for my patients in both a hospital and community setting.

To conclude, I support Option 1: Retain the status quo of providing general guidance about the Board's expectations of medical practitioners who provide complementary and unconventional medicine and emerging treatments via the Board's approved code of conduct.

**From:** [REDACTED]  
**To:** [medboardconsultation](#)  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments  
**Date:** Sunday, 30 June 2019 3:18:52 PM

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Dear AHPRA,

Very disappointed in your unprecedented act of questioning how functional medical doctors practice in this country. I support option 1 where the current regulations are sufficient to regulate current practices. The proposed guidelines are unnecessary and provide no added value in terms of patient safety or clarity of practice for doctors.

I was trained at [REDACTED] University years ago, at a time where autism was mentioned for about 10 minutes in a lecture by a psychiatrist in passing.

Even now, autism is diagnosed by how many ticks you get from the DSM-V manual.

Is autism really just a psychiatric disorder or is it multifactorial in its causes?

We didnt have the opportunity to learn that at medical school, definitely not when I graduated in 1995.

I chose upon myself to educated myself more since then as I have 2 children on the spectrum. Has conventional medicine helped them much up to this point? Yes, in terms of diagnosing and labelling the child. Yes in terms of providing remediation for 'symptoms' such as poor speech, emotional regulation where we refer them on to speech therapists, OTs and the likes.

Does it address the root causes of ASD (and other chronic illnesses for that matter)? Does it address epigenetic causes? Dietary intolerances? Heavy metal issues and viral infections, among others?

I have to humbly admit that i have helped a lot of kids and their parents with 'undiagnosed bad behaviour' just with dietary changes alone!

I am currently undergoing certification with the Institute of Functional Medicine. I attend regular functional medicine conferences organised by ACNEM and other functional medicine providers. It is an ongoing learning process. I dont just address autism now, I work on patients with other chronic illnesses that sometimes conventional medicine have no answers for.

There are reputable Medical Colleges (eg ACNEM) and associations (IFM) striving hard to maintain the integrity of Lifestyle medicine (encompassing of Integrative and Complementary medicine). In an era where more and more countries are supporting Integrative approaches like France, Germany and the USA, it is only regressive to control or banish evidence-based complementary and nutritional medicine just because there are other non-evidence-based alternative therapies that should be regulated better.

Thanks and regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 27 June 2019 12:25 PM  
**To:** medboardconsultation  
**Subject:** Complimentary medicine regulation

Hi,

I am writing this email to voice my concern over regulation to medical practitioners who provide complementary medicine.

First of all let me start by stating that "so called" alternative medicine is what has been around for thousands of years. Conventional medicine has been around only for hundreds of years. While conventional practices are fantastic in acute care, long term health care benefits from a combination of the two streams.

The focus of Western or complimentary medicines is to simply treat the symptoms now. A treatment is more than just fixing symptoms - it should be a treatment that fixes the whole person not just the underlying symptoms. My GI was prescribing a strong drug with serious side effects and I asked him what are the side effects and what happens in five years? He told me his job is to fix me now and not think of what happens in five years down the line. A relation between a doctor and a patient is based on trust and the duty of care extends long after the patient has left his or her care.

Evidence-based medicine or conventional medicines assumes one treatment suits all. It attempts to define a universal "best practice," based on large randomised controlled trials and meta analyses. No two patients are the same, no two interactions will be the same.

Now to say that complimentary medicines are not evidence based is wrong. It has been tried and tested by many and passed down to generations. Of course, it hasn't been tested in a lab with controlled trials but that does not mean millions of people around the world are wrong.

The best health systems combine the two streams - conventional and alternative. Many of us have got a massage every now and then. A massage increases blood flow and relaxes the body. A simple alternative treatment for a complex problem. It is a well known fact that acupuncture works alongside conventional medicines to relieve mental health problems. Evaluating the efficacy of acupuncture in depressed mood and other mental health problems poses many methodological challenges because of differences in the severity of mental, emotional, and physical symptoms.

Integrating alternative into conventional treatments has been successful in many countries like China, South Africa and many of the Asian countries and Europe. The cancer success rate in China combining the two therapies has a better outcome than the conventional treatments alone. That also means treatments for patients can be individualised instead of focussing on 'One treatment fits all'.

Please do not place restrictions on integrative doctors. Rather it is time to bring the two treatments together into the mainstreams. I have a wonderful integrative doctor who I trust and has given my health back. So please consider the emails from everyday Australians who have chronic diseases and are trying their best to survive every day.

Regards,  
B

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**From:** [REDACTED]  
**Sent:** Friday, 5 April 2019 2:24 PM  
**To:** medboardconsultation  
**Subject:** consultation on complementary and unconventional medicine and emerging treatments.

5/04/19

Medical Board Submission,  
**Regarding the public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments.**

As an Australian citizen I feel that my medical freedom and freedom of choice is part of a free and democratic society. My wife has suffered recently with severe debilitating fatigue and neurological disorders, as a result of spinal surgery. A Neuro-surgeon told her he had "absolutely no idea" and then charged us \$290! You say that you are concerned about people financially investing in treatments that are not evidence based, I financially invested in an appointment which was a complete waste of my time and money. Without a choice in practitioner, without the option for help and guidance which does not involve pharmaceuticals and more surgery what is my wife supposed to do? Give up work? Go on disability allowance? How is she supposed to function when conventional as you term it is no idea? I am unsure when Pharmaceuticals became the only choice in health? When did AHPRA and the medical board decide that their doctors were only allowed to be pharmacists or surgeons? The amount of evidence supporting non pharmaceutical treatments is overwhelming and therefore I can only assume this attempt to quash such treatments is instigated by the pharmaceutical industry attempting to get more control in a market that they already have unhealthy monopoly on.

My family personally needs an integrative doctor and do not want that doctor to be limited in what they can test for or prescribe. However I write this letter with little hope of it making any difference as the evidence suggests AHPRA and the AMA will do as they please under the guise of public safety.

Yours faithfully

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 27 February 2019 12:53 AM  
**To:** medboardconsultation  
**Subject:** Integrative Medicine

To Whom It May Concern

It has come to my attention that there is a need for those of us who rely on these Drs to stay alive, to stand up and be counted. If you take away our integrative Drs and medicine, you will be responsible for our suffering and deaths. If you do this, you will be setting medicine back to the dark ages. If you can live with this, please go ahead. You will be remembered along with some very dark people in history.

Make our medical system the best in the world. Help us stay alive with less suffering.

Kind Regards

[REDACTED]

## Regulation of Medical Practitioners

Name: [REDACTED]

Occupation: Mother, Teacher Aide

Today is well past the cut-off date for submissions. I acknowledge that, and know that my submission doesn't count towards the consultation paper.

However, I felt led to write anyway, because my health doesn't have a cut-off date, and neither should my right to consult with the medical practitioner of my choice.

I am a woman of 38 years of age. I have had three children, all healthy, and throughout most of my 38 years I have seen a variety of 'medical practitioners'. I have been told many things about my health, but in the end it boiled down to this:

"Your thyroid is within normal functioning range, your iron levels are fine. Is your life stressful? Is there something you can do to get more rest?"

This was the advice given me from a normal GP, not once, not twice. In fact, more than 10 times. One doctor even told me to drink more coffee.

Conventional medicine fails to look at the entirety of my body – body, mind, spirit, lifestyle, diet. Just like this consultation paper will never see the full benefits of integrative medicine.

But I leave you with this thought.

I am feeling well now that I have seen a doctor that includes supplementary medicine, holistic methods and lifestyle changes alongside the knowledge and expertise of a regular GP.

I regret that I did not submit this letter on time to be counted, but more than that, I am scared to think that the Medical Board of Australia is trying to refuse the general public the right to see a qualified GP who uses integrative medicine to help their patients.

Because the alternative is worse. The results will be devastating. Instead of trained physicians, you will leave us to seek alternative treatments outside of the GP circle, seeking help from 'practitioners' of dubious ability to combat chronic ongoing health problems that the normal GP is not willing or able to contend with.

You will open the doors for a torrent of 'medicine' to be offered to helpless, sick, chronically ill people, by untrained 'practitioners'.

Really? Let the integrative doctors do their doctoring, and let those that seek their help, get well using their methods. Everyone has the right to see which ever doctor they please. Please don't take away my health. Please don't take away my future.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 28 June 2019 4:54 PM  
**To:** medboardconsultation  
**Subject:** I Choose Option 1

Dear MBA

I choose **Option 1**: “no new regulations are required for doctors practising in the areas of complementary medicine and integrative medicine.”

My family sees Integrative Medicine doctors because conventional medicine offered very little help with autoimmune diseases affecting two members of my family. These integrative doctors have qualifications beyond those of conventional doctors and they spend the time required to find out what lead to the autoimmune diseases developing and offered treatments which not only address the symptoms, but the root causes of the diseases as well.

I prefer to use natural approaches for managing my family’s health instead of pharmaceuticals. They have less toxic side effects and have been very helpful in getting our health back on track.

I have concerns about the proposed regulations to regulate Complementary Medicine or Integrative Medicine. These are safe practices that need no further regulation. I have found Complementary Medicine to be very effective and believe the system should be left as it is.

In addition:

- The Medical Board of Australia includes members of the Friends of Science in Medicine, a political lobby group opposing Complementary Medicine and Integrative Medicine. This is a clear conflict of interest. The Medical Board of Australia should cancel the current consultation, and go back to the start with all current and past members of the Friends of Science in Medicine lobby group excluded from Board participation.
- There has been no transparency in consultation process. Freedom of Information requests as to how these proposals originated have been denied or redacted. The Medical Board of Australia has acted in secrecy and a failure to disclose the details of why the new regulations.

Kind regards





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**From:** [REDACTED]  
**Sent:** Wednesday, 27 March 2019 1:14 AM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments

Hi, I'd like to let you know how integrative/Functional Doctors saved my life and allowed me to have a full active working life that would not have been possible had I remained on Thyroxine medication.

I was diagnosed with hashimotos in Victoria around 20 yrs ago and the Dr prescribed me 50mcg Thyroxine, however I don't remember being told it was hashimotos, I think I was told it was just a thyroid issue, but then again I was really sick and don't remember too much at that time. I saw a little Improvement but was still very sick so I was sent to an endocrinologist who upped my Thyroxine to 200mcg a day. I was kept on this level until I moved to [REDACTED] when I was 45 yrs old. With a new stressful job, I became really sick, really struggling to get out of bed each day. I bought a book in Big W whose front cover read "even though your Thyroid tests are normal you still feel sick". I read that book cover to cover and went to my Dr and asked her about ordering the tests in the book which included free T3 free T4, Rt3 as well as TSH. The Dr said no and told me to get used to the way I was feeling as it was due to my age (45yrs) and that I needed to lose weight even though I walked the dog each day and walked up and down hills at work each day. I cried all the way home. I have worked in the welfare industry most of my life and had worked with children with disabilities and their families. When I got home I realised that I needed help big time as I couldn't operate in my life at the level I was. I couldn't think straight, I was putting on weight, not eating as I always felt full, constipated really bad and sleeping a lot but not feeling refreshed at all upon waking. I realised that support groups know all the best Drs in the area of need. I contacted the Thyroid support group who were able to send me a list of Drs who could help me. My first angel Dr, introduced me to thyroid extract after ordering the correct tests to see what was happening. I felt like a new person for about 3 years and then I started to feel unwell again. My Dr had resigned and moved to another position within the government. I was devastated, so went back to the support network who gave me the updated list and I found my 2nd angel Dr. when I let her know how I was feeling she ordered more blood tests and found that I wasn't converting my T4 into my cells and she prescribed me T3. This was the game changer that has helped me be as healthy as I can be with this disease. Hashimotos is a complicated autoimmune disease that effects every organ, tissue & cell in the body and it's an ongoing battle to keep on top as it effects Vitamin D, B levels, iron, selenium and the list goes on. In the last 12 mths I have gone from a full time Manager travelling long distance in a very stressful job to part time as the stress was impacting on my health and my autoimmune disease. Again I can't emphasise the difference of having access to medications other than Thyroxine has had on my life. I raised two children alone and put them through university, while working full time. I have been a tax payer my whole life and had I stayed on Thyroxine, I wouldn't have been able to achieve these things and been an active contributor to my community and society. Please recognise that not everyone can take Thyroxine as this only provides T4 but the body also needs T3 to convert into the cells. I recently went to see a local Dr with a good reputation to see if she could assist me with testing as she is closer to me than my current integrative Dr. I was really disappointed in her behaviour and after speaking with her, realised she had no idea and I would be going backwards in my treatment. I've lived with and completed a lot of research on this disease every day for 20 years. I can have a conversation with a Dr and know within a few moments the extent of their knowledge. Having the wrong Dr would have seen me on a disability pension and a burden on society. Had I not had the will and determination to get better to a point of functioning well as I could for my kids and myself. I hate to think where I'd be right now had I not found the wonderful Drs who ordered the right testing and then prescribed the right medications for me. I have found that functional medical doctors are expensive, however I'd prefer to pay more to be well and able to live a full life as the alternative would have been disability, a burden on society and a life of unfulfilled needs. I'm crying right now as I think of all the wonderful women out there who do not know about the integrative/functional Drs and whose lives are a living hell as they have only been prescribed Thyroxine and for those too sick who can't work and therefore don't have the financial means to access these Doctors.

Please heed my words.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 20 March 2019 6:09 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments

The consultation paper seeks answers to a variety of questions supporting the Board's preference for Option 2 - imposition of draft guidelines.

As a consumer of health services, I do not support that option for the following reasons:

#### **Limiting access to doctors**

There is already only a limited number of doctors who are prepared to work with patients who do not wish to pursue conventional treatment. A family member of mine elected not to follow recommended medical cancer treatment and their doctor then refused to see them, leaving them unsupported in the management of their medical condition. We need more supportive doctors who are prepared to work with patients to better understand a patient's preferred treatment options, not less.

It is likely that greater regulation will further reduce the number of doctors prepared to support patients to understand the courses of treatment they wish to explore. A patient's health should still be their own responsibility, being fully informed of the risks of treatment they are exploring. The current regulations provide some room for this to occur. There is no need for change.

The risk in reducing the number of doctors prepared to work with patients in this area is that people turn to 'Dr Google' to get answers, and find people like Belle Gibson who share their story (in that case fraudulently) and attract followers who copy what they say they did without any medical input.

*Are safeguards needed for patients who seek 'complementary and unconventional medicine and emerging treatments'?*

The discussion paper, through reference to Relevant Tribunal Decisions, has highlighted that the current regulations are sufficient to both identify and prosecute practitioners who fall outside expected standards of practice, without the imposition of further regulation.

There is no evidence that further regulation will reduce the instances of complaint about medical practitioners, or reduce risk to patients of integrative treatments. It will simply make less practitioners available to patients to inform them of risk associated with that treatment and leave patients little choice but to turn to 'health coaches' who have no medical qualifications whatsoever. The amount of consumer spending in this area highlights the risk to patients if medical practitioners are not available for consultation.

Issues of harm have been raised. This issues apply equally to conventional medicine. Thalidomide (conventional medicine) is a prime example. Much harm was caused despite clinical trials. This issues also disregard the impact and benefits that can arise from the placebo effect. No one treatment, conventional or non-conventional, is guaranteed for any patient because every person is different.

Medical practitioners need to be encouraged to review non-conventional therapies to better enable their patients to make informed decisions not be banned from even looking at non-conventional therapies.

A better option would be to support medical practitioners to help patients explore their preferred treatment options and to identify potential risks, and be a trust adviser during a difficult time, but not to persecute doctors for supporting patients who chose to undertake a non-conventional treatment.

A patient's freedom of choice should be respected, whether or not a practitioner agrees with that treatment. To reduce harm, is to support a patient in their journey.

Regards

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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**From:** [REDACTED]  
**Sent:** Monday, 11 March 2019 11:54 AM  
**To:** medboardconsultation  
**Subject:** 'Public consultation on complementary and unconventional medicine and emerging treatments'

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

To whom it may concern,

I am deeply concerned with the direction complementary medicine is being forced into in Australia at this point in time. This latest consultation, if it were done in the spirit of genuine inquiry and with integrity, would be welcomed. Unfortunately, given the way complementary modalities have been unjustly and unscientifically treated by the NHMRC (<https://releasethefirstreport.com/>) and other government departments, all trust in due process with honest outcomes has been destroyed.

It is with this attitude in mind that I would urge for holistic medical practitioners who practice natural modalities along with pharmaceutical medicine, to remain regulated under Option 1 - Retain the status quo of providing general guidance about the Board's expectations of medical practitioners who provide complementary and unconventional medicine and emerging treatments via the Board's approved code of conduct.

Holistic medical practitioners often have months' long waiting lists as they are very strongly referred by those who have found great benefit from treatment. Another reason holistic MD's must not be a target for government hostility is because the modalities these doctors practice help to fill the many existing treatment gaps present in conventional pharmaceutical medicine for many chronic diseases. Their patients have often searched unsuccessfully through endless conventional treatments until coming across one of these holistic MD's who literally change lives.

I myself have seen the benefits as my two boys have both suffered through various health issues which would never have been able to be resolved through conventional treatments. After holistic treatment including nutritional support, herbal and homeopathic treatment, both are very healthy, happy and well-adjusted kids. For a while when they were younger, I was worried they would end up chronically ill for their entire lives. Had I chosen the conventional route, we would have been living a nightmare of suppressive pharmaceutical treatments which would not have improved anything at all but masked their symptoms and contributed to their ill health with the gamut of side effects pharmaceuticals come with.

Not only did I reduce the load on the already overwhelmed Medicare system by seeing a holistic doctor, I have also potentially reduced any future load on the system as they will not need lifelong pharmaceutical treatment. Is this not something the Australian government would want to support, like Switzerland and many other countries? A collaborative approach seems much more sensible when looking at the maintenance and development of health in anybody, especially given that pharmaceutical medicine is now the third leading cause of death.

The only conclusions I can make is that corruption runs far deeper than I ever imagined and therefore my trust (and many others' trust) in this system is completely broken. Please decide based on the value holistic medical practitioners give to their patients, rather than bow to pressure from corporate interests which do not have the best interests for Australians at heart. Australia needs holistic MD's who offer their clients the best of both worlds, without being regulated out of existence.

Regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 7 June 2019 6:50 AM  
**To:** medboardconsultation  
**Subject:** Re: Consultation on complementary and unconventional medicines

To whom it may concern,

I am very concerned to hear that there is an attempt to censor integrative and complementary medicines in Australia and I am wondering what I can do to help keep these practices in place.

After years of coping with array of person medical problems including the following:

- issues relating to the birth of my child and emergency medical procedure (fully inverted uterus) leading to a complex set of hormone and other unusual muscular issues
- early onset menopause leading to years of hormone imbalances
- problems with arthritis, bursitis and other joint issues formed from overuse and occasional falls, ie: shoulders, knees, feet and neck
- hereditary issues relating to thyroid problems
- other stress related issues impacting my adrenals, and other systems

I spent years searching for traditional medical doctors to help with these issues and was constantly frustrated and appalled at the basic knowledge and lack of willingness to think outside the square when it was often obvious (even to me) that the standard accepted procedures were not working for everyone and that a lot of these issues seem sit outside of the standard medical model.

I finally heard about an integrated doctor who immediately showed an extraordinary wealth of knowledge about the issues I had, and comprehensive and common sense systems and procedures in place in order to find the root cause of my issues. This was an extraordinary breakthrough for me and gave me great relief both medically and emotionally. To be truly listened to in such a respectful way was something I had not experienced.

My integrative doctor found quite complex causes for my issues and has over time fixed these issues. Since then I have since been to two other integrative doctors who also seem to share the same passion for their work and quite a different practice that incorporates a far more respectful, interested care along with the desire to find root causes. They often have a significant knowledge in specialised areas along with all of the normal standard techniques found with more traditional medicine.

These doctors have also introduced me to other therapies that gave me great physically relief and fixed my long term issues with joints without surgery.

At the same time I have continued to use traditional medical doctors for issues such as coughs and colds, stomach upsets, pap smears and occasional flu shot etc. and they have been great for these things. I just find if I need anything that is outside of basic medicine, there has been no interest and absolutely no service available.

Over the years I have also tried other medical practices such as Chinese Medicine, Chiropractics, Naturopathy, Kinesiology and an array of other services. From my life's experience I truly believe that all of us are different and need a range of different treatments to suit our many and various requirements, and therefore all of these practitioners have their place in society.

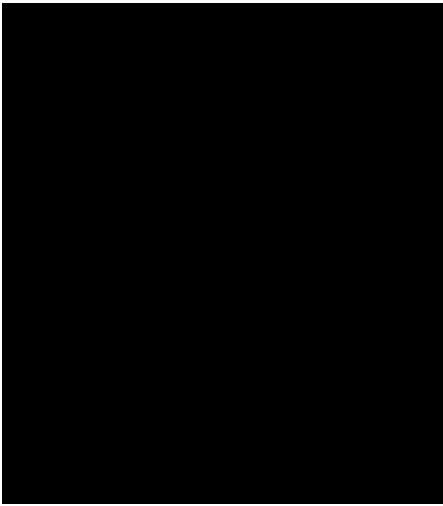
I am nearly 60 years old and have tried at least 40 traditional medical doctors and specialists over the years. I understand the need for both traditional and integrative medical practitioners in society and can speak highly of both the integrative doctors and the traditional medical doctors I have met. I can tell you though, that my body and my life would be far less problematic and in so much more pain if I had never found the integrative doctors.

Its crystal clear to me that the need for freedom of information and choice in these areas is vital and that it would be a backwards step to put heavy restrictions on these doctors and therapists. The opposite should be happening. All new ideas and therapies should be listened to and respected for what they may offer society. Obviously there needs to be guidelines in place to encourage consistency and truth, but you should all be working together for the good of us all, with open minds and a willingness to look outside of any box that proves to be limited or restrictive.

Warm regards,

[REDACTED]

[REDACTED]



## **Submission to MBA regarding Consultation on Contemporary and Unconventional Medicine and Emerging treatments:**

My name is [REDACTED]. I'm a 55 year old woman.

My email contact is: [REDACTED]

### **MY BACKGROUND**

I've previously worked as a Registered Nurse in hospital settings within both the public and private health systems in Australia. For some time I worked in both child and adult Intensive Care Units.

Thank you for the opportunity to contribute to this discussion.

### **COMMENT ON THE PROPOSED TERM**

- **I strongly disagree with the proposed term: 'complementary and unconventional medicine and emerging treatments.'**

This term is biased. It includes three distinct different areas or domains of activity which don't belong together and which should not be grouped together. It conflicts their meanings, actions and purposes. This lacks integrity, relevance and could be dangerous in practice.

It could also cross cultural boundaries and borders of belief regarding health and wellbeing practices and negatively impact the social determinants of health for whole groups of people who have diverse health and cultural needs, to prevent disease and maintain or find health. This term lacks cultural sensitivity towards people's personal health beliefs and opinions.

Australia is a signatory to the Universal Declaration of Human Rights which was declared by the United Nations general assembly 10/12/1948. Health rights and human rights are interlinked, as are the social determinants of health and wellbeing. Health and disease have a social construction in and across time. To me this means that any changes that impact a person's ability to access medical care, including Complementary medicine and Integrative medical care that is coherent with their cultural and health beliefs - needs to be well informed from a health care perspective that includes protections for patients' values and beliefs and does not impede their access to what they need to maintain their health and wellbeing ("Universal Declaration of Human Rights", 1948).

People such as me in the community - have diverse cultural, health and human rights that intersect within our unique genetic and cultural needs, and desires for specific types of medicines or care that support our health, and our informed health choices. Seeking out appropriate medical care according to our needs is our human and health right, and involves freedom of choice and opinion. It also involves patient privacy. The above term could in use violate many of these areas.

That as a consumer of Integrative medicine and as a patient of an Integrative medicine doctor; I've had to write this submission to defend the medicine of my choice and my access to it – which is world's best practice - to the Medical Board of Australia, while there is no

transparency about who the undisclosed stakeholders are in this debate – should demonstrate to you that this proposal violates patient privacy. This is unacceptable. Where are medical ethics in this debate exactly?

#### LIVED EXPERIENCE OF INTEGRATIVE MEDICINE USE

I've been a user of Complementary medicine since a child; parallel to using Conventional medicine as needed – usually to deal with acute problems such as infections that needed antibiotic treatment.

My first exposure to Integrative medicine was as a sick child age ten following an unidentifiable debilitating infection and six months out of school. The Integrative medical doctor made recommendations to my mother to remove me from the medical system and find practitioners of Complementary medicine to treat the post viral syndrome that the Integrative medicine doctor diagnosed, stating back then that conventional medicine had nothing to offer me. This advice was followed through with good effect and full recovery occurred with treatment being mostly nutritional medicine based.

Around 2002 I heard about the Australasian College of Nutritional and Environmental Medicine and sort out an Integrative medical doctor via their referral page. Since then I've utilised Integrative medicine and Integrative medicine doctors as needed to address complex medical and health challenges with good effect. This was usually after consulting a conventional medical doctor and being offered pharmaceutical medication alone for a health issue. I've found Integrative medicine doctors consistent use of nutritional medicine and in-depth pathology testing to be very helpful and informing. As a community they seem to be knowledgeable, well informed, innovative, forward thinking and many have the added value of lived experience that they bring to their Integrative medicine practices. Using Integrative medicine makes sense to me as a proactive way to minimise disease burden and find a path for returning the body to health. To me it's responsible health orientated medicine that's future medicine and leading edge. It makes sense too as a more sustainable form of medicine which intersects with life and the natural properties of life which underpin health and wellbeing.

#### INTEGRATIVE MEDICINE USE BENEFITS

I've found Integrative medicine to be very cost effective medicine due to it having high value in use, leading a person back towards health and contributing to outcomes that limit disease progression or promote remission – as has been my experience with an autoimmune disease, a neurodegenerative nervous system pathology, a complex stealth infection and a chronic inflammatory syndrome.

From a public health point of view this saves the health budget and flows onto economic benefits within society as well as improved quality of my life and improved overall health and wellbeing for me the patient and health consumer. This can involve considerable out of pocket expense to the patient initially however in terms of health recovery longer term it's totally worth it, not to stay chronically ill or get sicker and develop a more serious disease pathology.



## CONCLUSION

There seems to be a distinct lack of transparency in this consultation process that seems to me to be undemocratic and not patient orientated. To me this proposal is not well informed about the sociological context of health, especially within an environmental medicine and environmental illness/disease context and doesn't demonstrate a cohesive or functional understanding of what Integrative medicine is. I expect better than this from medicine, medical science and the MBA.

Integrative medicine practice is inclusive of Conventional medicine. It's not separate to it. It is an integrated approach which is evidence driven. Seeking to create division within the community of Australian medical doctors is disappointing. This is not in the patient interest.

Integrative medicine and Integrative medicine doctors serve the underserved patients; those with complex and chronic health challenges. Access to Complementary medicine and Integrative medicine are integral to the health recovery journey of many Integrative medicine patients as essential medical and healthcare life supports; often resultant to the medical neglect they've experienced within other areas of the healthcare system as very sick chronically ill people.

From a sociological perspective how these patients are treated and what their health outcomes are, flows on to affect the whole of our society. It touches each one of us as a community of people. Integrative medicine doctors providing leading edge care to this community of patients are in fact - supporting the option for a better level of health for everyone in our society, and also access to this option of better medical health.

In the face of what I see and have experienced personally in our health system, along with the fact that Integrative medicine has saved my life and at times been the only actual medical care available with an ability to recognise or address my health issues from a clinical medicine standpoint as informed enough to recognise what was going on for me; I fully support –

**OPTION 1: No new regulations are required for doctors practising in the areas of complementary medicine and integrative medicine.**

**Further, I request the Medical Board of Australia act responsibly in the patient interest - and redact the proposed term immediately.**

Please protect Integrative medicine. It's future medicine and in a climate changing world where our government is leaving this conversation out of the healthcare system, Integrative medicine and access to it could one day be pivotal to our survival as a population. Some of us have been blessed enough to have already lived this story via having caught the wave that's on the leading edge of climate change and which is spreading tick borne infections and diseases around the globe. Some people like me are only still living thanks to Integrative medicine and Integrative medicine doctors.

Sincerely,



## Reference

Universal Declaration of Human Rights. (1948). Retrieved from <https://www.un.org/en/universal-declaration-human-rights/>

██████████  
New South Wales

The Executive Officer  
Medical  
AHPRA  
GPO Box 9958  
Melbourne 3001



Dear Sir/Madam,

My name is ██████████ I am a full-time carer for my adult daughter who is 25 years old and largely confined to bed due to severe chronic fatigue, pain and relapsing fevers which started at 14 years of age. As she is too unwell and unable to concentrate for even short periods, I am writing on her behalf.

My daughter has been in the care of a local General Practitioner for most of her life. The GP has been unable to determine an obvious cause for my daughter's condition nor has she found a suitable treatment over many years to avoid the ultimate withdrawal from any semblance of a normal, active life for a young adult.

In our search for answers, we consulted an Integrative Medical Practitioner in November 2017. During the last 16 months, various tests have revealed some medical reasons for my daughter's condition, including a genetic mutation, which has allowed my daughter to be treated using conventional medication, vitamin supplement and nutritional supplement. The treatment has also included some complimentary options with herbs and lymph drainage massage. We have been very pleased with the availability and positive impact these have had on my daughter's condition. We are always given all the available options and information for treatment including complimentary options and have found the best results to be achieved with a combination of therapies.

The care my daughter has received has been a tremendous boost to her wellbeing and provided significant hope of recovery. The cost, whilst always a consideration, has been reasonable for the involved nature of the illness and treatment.

The Integrative physician has provided treatment and understanding of the issues that has not been available through our GP, Immunologist and other specialists.

The availability of treatment options to help chronically ill patients who have been unable to find suitable answers and treatment over many years from other doctors, has been absolutely vital to be able to move towards health and wellbeing.


Removal of such options would result in the abandonment of thousands of Australians who have struggled to find adequate acknowledgement and ongoing care due to the complexity and unusualness of their medical conditions.

Scrutiny of such practices in complimentary medicine and practices which combine conventional medical practice and complimentary medicine should, of course, be rigorous. Is should be just as rigorous as scrutiny of any medical practice but not especially targeted for a more onerous burden which could result in completely stifling any helpful treatment being available.

In my opinion, the treatments received by my daughter are highly specialised and I believe it should also be recognised as a speciality in order to allow best practise and knowledge sharing. If Integrative physicians are prevented from delivering their expert care to very sick patients I would like to point out that thousands of Australians would be abandoned and forced to rely on medical care which is too limited and under-resourced to meet their specific and often unusual treatment needs. Surely, as Australians, we should be able to access the specific health care each individual needs rather than being limited to the health care "most" people require. Many people fall outside those conditions which can be easily identified and managed.

Removing treatment options such as those offered by Integrative physicians will result in a loss of adequate and appropriate care and essentially a loss of hope for the most vulnerable patients. It would not represent progress, rather it would most certainly result in a step backwards to ignorance and intolerance of those with complex and unusual medical conditions.

As Australians, I believe we have the resources and capacity to embrace and encourage innovation in treatment which allows those patients in the grips of difficult, chronic and exhausting health conditions to be embraced, affirmed and ultimately treated with a view to recovery and return to a meaningful life.

  
24 May 2019

## Comments on the document

“Public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments”.

I am a patient with a number of complex and overlapping health issues which I have lived with for several decades. My overarching concern is that medical practitioners are increasingly working in a straightjacket which limits their ability to provide me with optimal health care. Furthermore over several decades of interacting with the medical system I have observed and indeed been subjected to conventional treatments which have seriously harmed me and which were not based on solid evidence. This includes unnecessary and harmful surgery.

In other cases conventional treatment was fortunately refused, as with my mother's refusal to take thalidomide while pregnant, which her doctor ridiculed her for at the time.

One observes in conventional medicine ongoing major sources of bias as documented extensively in the academic press.

These include the excessive role of pharmaceutical companies in deciding which research is done, and which studies are published and how studies are conducted, how data is 'cleaned up', their role in ongoing medical education, ghost written journal articles, and stacking of committees with 'friendly' members. Of course there are also p hacking and exploitation of the garden of forking paths, the bottom drawer effect, as well as outright fraud. Commercial interests also achieve undue sway in, e.g., dietary guidelines by use of funding of specific lines of research, “speaking fees” and “consulting fees” that influence opinion makers, “free” training, sponsorship to conferences, give-aways etc. We know what a large fraction of published findings are wrong and that a large proportion of meta-analyses are worthless (e.g. “Why Most Published Research Findings Are False” John P. A. Ioannidis and other related papers). Not least the medical literature is riddled with statistical illiteracy e.g. thinking a P value  $> 0.05$  shows no effect, or that a statistical association in an observational study demonstrates causation. “Corrections” are made to adjust for confounders with little understanding of whether this is valid, which it often is not (as one obvious example if you correct for something on the causal chain you make things worse, and correction typically ignores nonlinear effects which makes the results invalid).

Simplistic metrics are promoted as “best practice” in a way that detracts from patient care in general and my health in particular. “Normal” ranges for metabolic variables are decided upon based on unclear criteria and generally ignore the relationships between variables and the functioning of the body as an integrated system.

Even more than 150 years after the debacle of Ignaz Semmelweis, we still have a situation where doctors do not reliably wash their hands before treating patients. I was recently informed by an executive at a major hospital that only 70% of doctors at his hospital were reliably washing their hands when they should.

Thus I believe that the world of conventional medicine should get its own house in order before cracking down on others.

I see the proposal in the document as further exacerbating the problem of doctors being subjected to a straightjacket of standard of care that is often weakly linked to evidence and indeed is often contrary to the actual evidence when closely examined.

The proposed definition is problematic

“Complementary and unconventional medicine and emerging treatments include any assessment, diagnostic technique or procedure, diagnosis, practice, 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.”

This is a social definition and makes no reference to evidence or to any other rational criteria. It privileges a particular slice of medical practice for no specific reason. It should be replaced with a definition based on rational and objective criteria.

I also object to the title of the original document. The use of the term “clearer regulation” comes across to me as a sleazy euphemism. The clear intent, it appears to me, is “tighter regulation” and the committee should strive to be honest in my opinion.

Options

I favour option 1

“Option 1 - Retain the status quo of providing general guidance about the Board’s expectations of medical practitioners who provide complementary and unconventional medicine and emerging treatments via the Board’s approved code of conduct.”

This would continue to allow doctors some leeway to treat me as an whole individual patient as best they can without being hamstrung by often dubious “best practice” that often reflects commercial agendas more than evidence.

[REDACTED]  
26 June 2019

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Saturday, 29 June 2019 12:05 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

Dear Medical Board of Australia

No new regulations are required for doctors practising in the areas of complementary medicine and integrative medicine. I have chosen to see Integrative Medicine doctors because I have suffered from chronic, debilitating illness for many years. It has affected my ability to work, ended my career in the legal and academic work, and has had a severe impact on my home life. It was not until I came to Australia and saw a doctor practicing integrative medicine that I received diagnoses and real improvements in my multiple, complex health issues. Using conventional medicine as well as nutritional and supplementary therapies I have regained some quality of life and have been able to return to work, part time, and to contribute to society again. Without this help and intervention my physical, emotional, psychological and financial wellbeing would still be compromised, and my marriage would have been under considerable strain and it is not an exaggeration to say it possibly may not have survived.

Hence I want to be involved in my own and my family's care and this requires time in consultations an additional medical training that I found in my integrative medicine doctor.

Conventional medicine provided no answers about why I was sick and I needed medical care with a wider range of diagnostic and treatment options.

I have been harmed by conventional medical treatment, and needed to find other options.

I prefer non-drug approaches for managing my family's and my own health or illnesses.

I am happy with my GP for simple treatments within brief consultations, but I want to go further with prevention and a deeper understanding of what I can do for myself and my family. My integrative medicine doctor provides me the time and knowledge to do that.

I want more from my doctor. More time. More understanding of causes of illness. More power to understand the ways in which I can improve my health to reduce my need for drugs, surgery and medical appointments. My Integrative Medicine doctor provides these for me in a way that 10 minute consultations with doctors cannot.

I have concerns about the proposed regulations because:

There is no demonstrated need to regulate Complementary Medicine or Integrative Medicine. These are safe practices that need no further regulation.

The only concern of the Medical Board of Australia in this process is, and should be, safety. The Chair has said this publicly. Questions about how effective Complementary Medicine and Integrative Medicine is should be a decision left to me.

The Medical Board of Australia includes members of the Friends of Science in Medicine, a political lobby group opposing Complementary

Medicine and Integrative Medicine. This is a clear conflict of interest. The Medical Board of Australia should cancel the current consultation, and go back to the start with all current and past members of the Friends of Science in Medicine lobby group excluded from Board participation.

There has been no transparency in consultation process. Freedom of Information requests as to how these proposals originated have been denied or redacted. The Medical Board of Australia has acted in secrecy and a failure to disclose the details of why the new regulations.

Yours sincerely

A solid black rectangular box used to redact a signature.

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**From:** [REDACTED]  
**Sent:** Thursday, 7 March 2019 9:57 AM  
**To:** medboardconsultation  
**Subject:** REGULATION OF MEDICAL PRACTITIONERS

As an Australian citizen I feel that I should have the right to choose the methods I use to address my chronic health issues.

Conventional general practice has not been able to successfully treat my condition nor bring me to a satisfactory outcome.

My condition remained unchanged and gradually became more chronic until I consulted with an integrative medical doctor who included lifestyle change, diet and supplements to address my problems.

If I cannot see an integrative doctor, I feel my health will deteriorate and have a continuing impact on my family, work and my well being.

Concerned

[REDACTED]  
7 March, 2019



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**From:** [REDACTED]  
**Sent:** Friday, 12 April 2019 8:09 PM  
**To:** medboardconsultation  
**Subject:** URGENT MESSAGE REGARDING SAFE MEDICAL PRACTICE

TO WHOM IT MAY CONCERN

I am a 63 year old healthy working woman. I am feeling outraged at this "witch hunt" on complementary medicine. I have a practicing medical background but I have always further educated myself on alternative therapies as well.

This started 1980 when my child was extremely sick and the local doctor and paediatrician could not cure my baby over a 18 month period. I started to read and seek out further information to improve my daughters health. It was a combination of what I read and talking to a Pharmacist about what information I had gathered. The Pharmacist gave me a vitamin and mineral mixture especially made for her symptoms. Within TEN DAYS it cured her. I had a well and happy toddler!

This opened my eyes to looking at alternate therapy.

So over the next 40 years I have used Homeopathy and Vitamins and Minerals when appropriate to cure myself and family. Every time they have been successful and results have proved their effectiveness.

It was very difficult to source products 40 years ago. Now we have educated doctors who are thinking out of the box and further educating themselves on alternate therapies. These Doctors use their knowledge to decide whether to use traditional drugs or alternate therapies. We also have some excellent Practioner Brand of Vitamins and Minerals and Homeopathy. But unfortunately we have some Doctors who don't want to be open to patients having a choice on health care. This is not acceptable way of thinking. Homeopathy Vitamins and Minerals can do you no harm, as compared to the many patients that are so badly addicted to prescription drugs. When a drug has a side effect, the patient is just given another drug to compensate. The patient then becomes another poly pharmacy addict.

People who use alternate therapies are not a financial drain on the PBS.  
People who use alternate therapies are not clogging up doctors surgeries.  
People who use alternate therapies are not clogging up the Public Hospital System.

These people care about their health and take responsibility at getting well and keeping well.  
They all want a choice of their own health care.

In my own personal case I have had some great results. For example when my thyroid had nodules on and I had a hemithyroidectomy. The specialist prescribed Thyroxine for the rest of my life. I chose not to follow this path of regular blood tests and having to titrate the medication forever. I chose homeopathic and it balanced my part thyroid and it has functioned well for the last 20 years. When my husband thyroid went into hyperthyroiditis and the specialist wanted to radiate it (common practice) again we tried homeopathic with reversal of symptoms and within three days. Thus avoiding hospitalisation. There are many more instances over the years that minerals and vitamins have solved other conditions.

I beg of you to listen to the people who use these integrated medical practitioners and let the people make their own decisions in life.

Yours sincerely

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 7 June 2019 1:37 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments

To whom it may concern

I am writing to you

In regards to the changes you are trying to bring in about removing "unconventional medicine" that drs can give there patients.

I for one get very bad reactions

To your "normal" drugs you prescribe to patients to treat thing And do don't like to put anything chemically injuiced Or modified , made in a lab Into my body As it's not natural at all

So think that drs should have the choice to offer that if they patients ask for it

Kind regards [REDACTED]

AHPRA-MELBOURNE  
RECEIVED

01 JUL 2019

24 June 2019

Dear Executive Officer,

I am writing to you today regarding the Medical Board's review of complementary medicine. I am asking for you to step up to protect my health freedom, and the health freedom of my family.

I come from a family of mainstream medical supporter. My mother, Aunt and sister are all nurses and for many many years, I believed that science-based medicine had all the answer that were needed for my health and the health of my family. I am now a father of four children and my family values GPs who can supply us with information on both science-based choices and integrative, complimentary choices for our health. We have found over the years that each body within our household is different and requires different means of healthcare. In their lifetimes, my children have required both forms of medicine to assist them and having a doctor who has both a complimentary medical background and a mainstream medical background has proven to be a significant help to my children's health. I was surprised and extremely concerned and upset when elements of complementary medicine such as Naturopathy and Homeopathy were removed from our private health cover without any discussion or consultation with the consumer and I do not wish to see this occur again (this is another area I believe requires your review and support).

I wholeheartedly believe that both mainstream medical practices and complimentary medical practices work hand in hand, and my family would lose faith in the Australian medical board if our health freedom of choice was taken away. Many countries embrace both forms of medicine as standard practice. Our country is built on freedom; it states so in our national anthem, but if the medical board enforces changes to remove complimentary medicine from its medical practices, it is removing our freedom along with it. Or health freedom is just as much a right as our freedom of speech, our freedom of education, our freedom of religion, etc. Our health freedom should not be compromised but valued for what it does to support the whole and protected to support the vast array of individuals' needs.

It is in the best interest of the patrons of our country to continue to allow GPs to practice both mainstream, integrative and complimentary medicines. Please support this to continue and for my health freedom to be protected. I appreciate your time.

Yours Sincerely,



[REDACTED]  
[REDACTED]  
[REDACTED]

24 June 2019

Dear Executive Officer,

I am writing to you today regarding the Medical Board's review of complementary medicine. I am asking for you to step up to protect my health freedom, and the health freedom of my family.

My family values GPs who can supply us with information on both science-based choices and integrative, complimentary choices for our health. We have found over the years that each body within our household is different and requires different means of healthcare.

I am a mother of four children and would not have been able to have any of these children if I had of remained under science-based healthcare, which I did for many years. When integrative, complementary alternatives were presented by my GP, it took only 4 months to conceive after three year of following what I believed at the time was my only alternative with consistently heartbreaking results.

In their lifetimes, my children have required both forms of medicine to assist them and having a doctor who has both a complimentary medical background and a mainstream medical background has proven to be a significant help to my children's health. I was surprised and extremely concerned and upset when elements of complementary medicine such as Naturopathy and Homeopathy were removed from our private health cover without any discussion or consultation with the consumer and I do not wish to see this occur again (this is another area I believe requires your review and support).

I wholeheartedly believe that both mainstream medical practices and complimentary medical practices work hand in hand, and my family would lose faith in the Australian medical board if our health freedom of choice was taken away. Many countries embrace both forms of medicine as standard practice. Our country is built on freedom; it states so in our national anthem, but if the medical board enforces changes to remove complimentary medicine from its medical practices, it is removing our freedom along with it. Or health freedom is just as much a right as our freedom of speech, our freedom of education, our freedom of religion, etc. Our health freedom should not be compromised but valued for what it does to support the whole and protected to support the vast array of individuals' needs.

It is in the best interest of the patrons of our country to continue to allow GPs to practice both mainstream, integrative and complimentary medicines. Please support this to continue and for my health freedom to be protected. I appreciate your time.

Yours Sincerely,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 6 March 2019 8:15 PM  
**To:** medboardconsultation  
**Subject:** Regulation of Medical Practitioners

Dear Madam / Sir

As an Australian citizen I feel that I should have the right to choose which methods I use to address my chronic health issues.

I have been suffering from fatigue & immune dysfunction. Conventional general practice has not been able to successfully treat my conditions and bring me to a satisfactory outcome.

My condition remained unchanged and / or gradually became more chronic until I consulted with an integrative medical doctor who included lifestyle change, diet and supplements to address my problems.

If I cannot continue to see an integrative Doctor, I feel very strongly that my health will deteriorate and have a continuing impact on my family, my work and my well being.

I urge you to act in the best interest of healthcare and to not jeopardise this in protecting the interests of the pharmaceutical industry.

[REDACTED]



[REDACTED]

Executive Officer, Medical, AHPRA

GPO Box 9958

Melbourne,

Victoria 3001

Re “Clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments”.

Having read the public consultation paper, as a GP I am concerned both for my patients with disability, and for my own 2 now adult daughters. I do not personally dispense any integrative, complementary or alternative medicines, but I do specify brands I know to be manufactured under strict quality control, and who offer liquid alternatives for many of my teen and adult patients with disability who are still unable to swallow tablets or capsules.

My 2 adult daughters, one who already had disability, and the other previously well, at the age of 35 years, each developed severe muscle weakness, with visual difficulties, difficulty coping with noise, headaches and extreme tiredness. When my daughter with disability saw her neurologist after she went from running and roller skating independently to needing a wheelchair to prevent falls, and had marked difficulty swallowing, her neurologist discovered that she had carnitine deficiency. Her Endocrinologist started her on 9 capsules of carnitine per day, with gradual partial improvement, but because the diagnosis took a while to be made, she will not redevelop her earlier good motor skills.

My second daughter had gradual onset of severe tiredness, muscle weakness, severe headaches, and difficulty coping with more than minimal noise. For 2 years, until she commenced taking carnitine capsules, she was unable to drive at all because the eye movement brought on severe headaches, and she was unable to cope with the glare. Before that she had been regularly driving to work in the country, and back for her University studies. When she was so unwell, her University grades were not very good, but with further study she is now in her 2<sup>nd</sup> year of Graduate Medicine and doing well.

My worry for my patients with disability is that manufacture of the liquid preparations might become either unviable, or just too expensive for pensioners, reducing their quality of life, and that of people around them, particularly family.

For my own daughters, because carnitine is mostly used for body builders, it is not listed on the PBS even for carnitine deficiency. My worry is that the proposed changes might have wider impact than anticipated, and carnitine currently manufactured under strict controls may be discontinued. The clinical improvement, and blood levels of carnitine within the recommended range in both my daughters suggests that they are getting genuine carnitine. My worry is less ethical manufacturers who may only have little or no carnitine in their products. When a person lacks adequate carnitine the toxic wastes build up because the lack of carnitine prevents the transport of the fatty acid chains, eventually resulting in increasing muscle weakness and death. I don't want to lose my daughters.

I would like the option of retaining the status quo, with the Medical Board providing general guidance about its expectations of medical practitioners who provide complementary and unconventional medicine, and emerging treatments by means of its approved code of conduct.

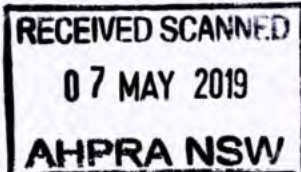
I am happy to provide further information if required.

Yours Sincerely

A solid black rectangular box used to redact the signature of the Specialist General Practitioner.

Specialist General Practitioner (Developmental Disability)





①

1st May 2019

Dear Madam/Sir,

I am very concerned with the opposition to menopausal women being able to access the use of Bio-Identical HRT with troches made by compound chemists.

Ten years ago I was suddenly suffering with about 23 severe hot flushes in 24 hrs. 3 during the night and roughly one every 1/2hr during my day and evening.

A "sick" feeling of dread would "wash" over me then the heat would start. It was distracting and embarrassing - with sweat running down my flushed face and neck. It was like being tormented.

I was losing sleep and becoming short tempered. It was stressful trying to camouflage these symptoms. I felt miserable.

Over the next 18 months I bought and tried every product available in the chemist, then the local Health Food Shop and then the supermarkets.

None of these creams and tablets worked for me.

Then my sister recommended her Specialist Doctor in [redacted]. He perscribed me Bio-Identical HRT troches "made to measure" for me (after urine and a blood test every 6 months) produced by a Compound Chemist.

PTO



(2)

1st May 2019

continued:-

I had to use up a sick day every 6 months to attend this doctor's surgery as [redacted] is almost 2 hrs drive away. It was worth it.

The doctor carefully instructed me; morning and evening to place  $\frac{1}{4}$  troche inside my mouth in the cheek pouch to allow the medication to be absorbed through the mouth lining.

Within 4 days all my symptoms began to fade then disappear completely.

I suffered no side affects.

I had my life back again. I was thrilled!

A couple of years later I discovered a local doctor - [redacted] - a specialist who also prescribed these "made to measure" hormone troches.

These days I only need  $\frac{1}{4}$  troche once a day based on my 24hr urine samples and regular blood tests.

I have regular mammograms, pap-smears and breast examinations.

I would be horrified to be told that I could no longer obtain these "made to measure" hormone troches.

I am 5ft 1 inch short; some women are 6 feet tall and weigh much more.

Yours sincerely

[redacted]

[redacted]

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**From:** [REDACTED]  
**Sent:** Friday, 15 March 2019 12:39 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments

Please help us who suffer from Hashimoto Hypothyroidism We rely on alternatives to just T4 as for the majority of us all this makes our blood test for TSH and T4 but when further tests are allowed you see that most of us suffer daily with the symptoms and require either T3 meds or NDT or a mix to help us have a better life as we aren't all the same and need our doctor to help us There is a Facebook group called Hashimoto Australia which has over 7thousand of other Australians who suffer and need more Gp's to help us and not just dismiss us anymore

Kind regards

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, 9 June 2019 6:47 PM  
**To:** medboardconsultation  
**Subject:** 'Consultation on complementary and unconventional medicine and emerging treatments'

Dear Medical Board of Australia,

I have been a patient of incredible and dedicated integrative / functional medical practitioners for decades which has kept me well due to living with chronic disease, because mainstream medical doctors with out the additional functional medical training could not help me. All they could do was give me medicine and not treat the cause of my illness. This only creates a burden on society and tax payers because this approach is not healing people it is making them reliant on medicines funded by government / tax payers. Why wouldn't you want people to heal the cause of their illness?

I am deeply concerned about any proposed changes to how medical doctors carry out their practice.

I believe any change creates a risk of serious harm to the public and would greatly impact my health and the health of tens of thousands of patients and the next generations to come!

*I vote for **option one** – Retain the status quo of providing general guidance about the Board's expectations of medical practitioners who provide complementary and unconventional medicine and emerging treatments via the Board's approved code of conduct.*

Yours sincerely [REDACTED]  
[REDACTED]  
[REDACTED]



8 March 2019

[medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

Dear Sir/Madam

**Public consultation on clearer regulation of medical practitioners on complementary and unconventional medicine and emerging treatments**

I am most concerned by Option 2.

There are many current conventional medical treatments that have arisen out of unconventional trial & error.

Many indigenous cultures & societies live with virtually no common/modern disease afflictions through the use of "traditional" or what might be regarded as complementary/alternative medicine.

Moreover, much of Europe, including eminent scientists & practitioners utilise so – called alternative & herbal medicine as well as non approved [in Australia] technical equipment to improve outcomes for chronic illness & cancer with documented success.

If all these methodologies were subject to Option 2 regulations, which we all know are sponsored by BIG Pharma, then the world would be an even sicker & poorer place.

Over regulation is a scourge of today's world & in this case it would deny an individuals freedom of choice by virtue of limiting medical practitioners legal ability to offer alternatives.

I can speak from experience where my wife died from breast cancer following the conventional path. In hindsight, I realise it was the chemo that killed her & robbed her of quality of life whilst emerging alternative treatments that are now being validated overseas may well have been more efficacious – certainly not as traumatic as chemotherapy.

To unnecessarily clamp down on well meaning, well educated medical professionals with a constant fear of losing their licence would be a travesty. We read all the time about conventional prescribed medications causing harm/death, way more than such occurrences with alternative treatments which are often safer & more gentle with less side effects.

I implore your morality on this issue & wonder if you had a loved one where conventional treatment was failing if you would want to be effectively denied promising alternatives?

Yours Sincerely



B.Com, M.Ec, CFP

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**From:** [REDACTED]  
**Sent:** Saturday, 29 June 2019 5:48 PM  
**To:** medboardconsultation  
**Subject:** Review of complementary and unconventional medicine and emerging treatments.

I write to submit my thoughts on this review.

2 of my family have chronic illnesses, not cured or treated effectively by traditional medicine - using drugs or any other modern treatments commonly prescribed by medical doctors.

That is, conventional medicine can only hope to treat and minimize the symptoms of their illnesses, and they routinely do not ask the question of WHY is this happening - what is the root cause of the illness we should be treating? We have tried all manner of unconventional and complementary medical tests and treatments, some have alleviated many of the symptoms and made life bearable. Other treatments had limited benefit, but nevertheless were not available through traditional General Practitioners. None of the successful tests or treatments were available from the GP either... In other words if we prevent those few doctors who are prepared to travel the journey of investigation with their long-term, chronically ill patients and try to find the root causes of the illnesses (such as ME/CFS which is not adequately understood and certainly not defined) then who will travel with us and assist us?

It is obvious, that all medicine was once unconventional - it was not normally accepted to cut up cadavas and research surgery and anatomy, but someone had to investigate the human form! Emerging treatments may well become conventional at some stage in the future, once proven effective. If those brave practitioners are prevented from investigating, then we have no-one left to help us.

Please do not stop them from doing their best - maybe you should consider joining with them in the research and investigation of why we suffer from these terrible, incurable, chronic illnesses instead!

Kind regards,

[REDACTED]

29/06/2019.

## Response to Public Consultation Paper: complementary and unconventional medicine and emerging therapies.

This submission to the Medical Board of Australia is based on my experience as a patient who has suffered with Myalgic Encephalomyelitis/Chronic Fatigue Syndrome (ME/CFS) for about 18 years.

### Conventional medicine has no answers

Conventional medicine has been at a complete loss to assist me over the course of my illness. It has become clear to me that the undergraduate training of GPs in Australia is woefully inadequate to deal with complex chronic conditions. In South Australia, there have been some brave, compassionate and dedicated medical practitioners with post graduate qualifications who have been prepared to think 'outside of the square' who have been of great assistance to me and the ME/CFS community. Some of these have called themselves 'Integrative Health Specialists'. All of these have been very scientific in their approach to my treatment, employing a **test – treat -retest (challenge then retest) approach** to my treatment, which has included taking my subjective experience into account.

They have challenged me to record many of my symptoms, to trial treatments that have some evidence base for an appropriate length of time and to cease treatments that have no functional impact on my symptoms. Many have had to look at international research and guidelines for information to guide them (for example, around blood test results and considering adequate levels of important vitamins, minerals and hormones to promote healing and health) as **Australian guidelines** appear to be either **based on resourcing levels** determined by governments or on particular pathology labs guidelines on what is 'normal', **rather than on the best available evidence**. Sometimes these practitioners have been **restricted in being able to retest for improved blood levels after a treatment trial due to the medical board's guidelines and therefore have had less objective information to inform their treatment plan**. They have constantly kept abreast of new or more comprehensive testing procedures, both nationally and internationally, that are well established but outside of the knowledge of most GPs. I have had few privately funded tests but all of the tests I have undertaken (private or Medicare funded) have provided very valuable information to explain my symptoms and inform my treatment. They have shown evidence of systemic metabolic disturbances / imbalances that have fluctuated over time as various systems have been affected. Most importantly, I have been listened to and the very real nature of my illness acknowledged.

### No Recognition of Emerging Illnesses

Suffering from a complex, multisystem, chronic illness that is poorly defined and researched and not even widely recognised as a 'real illness' by conventional medicine has been a very difficult journey. It's prevalence, as in 2018, is now considered to be much greater than the numbers who suffer with MS, Parkinson's or Breast cancer. The NHMRC is currently considering future research funding into ME/CFS, as the search for definitive biomarkers continues

by many specialists and researchers around the world. There is much hope that one day we will have the answers as to the biological causes of this illness and well-researched 'conventional' treatments will be available. **All emerging illnesses go through this phase** and it takes many, many years for the research to be funded, occur, be replicated and then for treatments to be developed and efficacy established. ***What happens to the patients who suffer with these previously unknown or poorly understood illnesses in the interim?***

Sadly history shows how patients (often women) suffering from other, now well researched and accepted, illnesses have been treated in the past because conventional medicine has not listened to them and had no answers for them. Patients with MS were thought to be suffering from 'hysteria' or malingering and committed to mental asylums. ME/CFS patients have been treated similarly. Many marriages fall apart and lives are ruined because conventional medicine supports the notion that this illness, that often strikes down previously healthy individuals, does not exist. Unfortunately this is exactly what is occurring in Australia at this time. **'Conventional medicine' can do much harm to patients with ME/CFS.**

#### **Conflicts of Interest in using evidence based practice – cost, research bias**

In my experience, a good GP or physician / specialist knows the limits of their own knowledge and seeks the expertise of other professionals in many other disciplines for the benefit of his patients. This is holistic medical care but indeed, as you have pointed out in your consultation paper, very expensive for patients. I agree that **greater communication** between all of the individuals treating a patient would be advantageous and may result in **better outcomes for patients**. This should be a necessary part of good practice and **the expense not passed onto patients**. Evidence based practice is indeed based on, not just the available research, but the everyday experience of the professional applying scientific principles or theories in their treatment of patients over many years, along with considering the individual patient's response, perspective and preferences.

It could be argued that there is considerable **conflict of interest** in much of the **research that occurs in this country**, with pharmaceutical and food manufacturing companies funding research, advertising and otherwise controlling information available to the public, and moving into the universities. Indeed, how much do certain elements of society control the practice of medicine in this country? It could also be argued that most mainstream GPs are benefiting financially from the illness of their patients and do not have any incentive to deal with chronic illness or health in a holistic way. Many GPs structure their practices around 15 min consults and are merely concerned with **prescribing drugs (recommended by pharmaceutical companies that also have a vested financial interest) that do not deal with the underlying causes of the illness**, just mask the effects, while ignoring a whole body of other research evidence into the augmentative therapeutic effects of nutritional supplements, impact of environmental toxins / heavy metals, interaction between systems in the body and other testing / treatment protocols. This ensures that patients will continue to return time after time to support the GP's income/lifestyle. Is this not also a



form of malpractice? **Who indeed does not benefit financially from those who are chronically ill?**

**Conventional medicine has caused me harm**, through its lack of knowledge, expertise, compassion and its inaction. Graded Exercise therapy was recommended to me early in my illness based on the PACE study which has since been discredited and is in fact potentially harmful for people with ME/CFS. I swam laps twice a week for an extended period. I believe this may have contributed to the long term nature of my illness. Graded Exercise therapy is still listed as a recommended treatment by the RACGP.

I am well aware of the issues around practitioners supplying the goods that they prescribe and can see many sides to this debate. It can be an opportunity to make more money from clients and over prescribe. It can also be seen as a service to the customer, who then does not have the burden of having to source their own products from elsewhere and generally has no idea of the quality of the product they are buying. It can be advantageous to patients for **practitioners to be highly familiar with certain products and the evidence base behind them**, and being able to monitor their effectiveness with different patient groups. I understand nutritional supplements are better regulated here in Australia than in the US and it is important that patients know they are getting a quality product for their money. However these **supplements are much more expensive in Australia and some are just not available and this is an additional burden on patients**. If some were to be regulated such that they were dispensed/recommended by a practitioner only, this may help guide patients to make the best use of their money however it can also restrict the patients access to supplements that can significantly improve their symptoms by not having them freely available.

### **Do no Harm**

**Without access to these integrative or complementary specialists**, supplementary testing, compounded medicine, quality nutritional supplements, the international research available through the internet and the support of ME/CFS SA Inc., **my condition would likely be much worse**. It is highly likely I would have deteriorated over time and become housebound, unable to exercise or look after my children. I may have been in a lot more pain a lot earlier. I may have developed con-comittant problems such as obesity, diabetes or ambulatory issues. I would have been unable to work part time and therefore unable to contribute to the family's income over the last 18 years. I would be more dependant on Medicare and government pensions long term. There are still many questions around what the cause of my illness is and what the priorities for treatment are. The fact that I am managing as well as I am is the result of the **collaborative efforts of many great minds and empathic individuals** over the years to whom I owe an enormous debt.

Having professional people who are on your side and are prepared to journey with you and use their knowledge and experience to problem-solve with you, is a **very important protective factor for anyone with a chronic illness**. The practise of medicine is about much more than administering drugs or fitting

patients into predetermined boxes, it's about **empowering patients and creating wellness. Attempting to shut down or restrict the practise of these specialists would do great harm to me** and many others who suffer from chronic illness.

The medical board would do well to advocate more for those with chronic or multifaceted illnesses – to reduce the costs associated with chronic illness, to improve the professional development of all GPs, to encourage more efficacious models of practise for GPs, to improve access to newly developed testing and therapies in Australia, to advocate for good communication / team approaches between treating professionals, and promote research into little known but hugely disabling conditions like ME/CFS.

[REDACTED]

29/06/19

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**From:** [REDACTED]  
**Sent:** Thursday, 7 March 2019 12:41 PM  
**To:** medboardconsultation

To Whom It May Concern,

Regarding the public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments

As an Australian citizen/resident I feel it's important that I have the freedom of choice in the type of medical care that I use to address my chronic health issues.

I have been suffering from Psoriatic Arthritis, Carpal Tunnel, Bursitis, Joint Calcification, Peripheral Artery Disease, constant pain and no sleep amongst other things.

Conventional medical doctors have not been able to successfully treat my conditions and bring me to a satisfactory level of health.

Pharmaceuticals and the use of conventional methods simply did not work (and in some instances also delivered unwanted side-effects in my case) and, seemed to waste Medicare funds and resources.

It was recently when I saw an integrative medical doctor who included lifestyle change, diet and supplements of vitamins and minerals to address my problems that my condition has begun to improve.

I now cannot see him anymore as Medicate won't cover the testing and it is too expensive for me.

If I cannot see an integrative doctor, or the Doctor is restricted in what he or she is able to prescribe for me, I feel that my health will deteriorate and have a continuing impact on my family, my work, and my wellbeing.

Concerned,



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**From:** [REDACTED]  
**Sent:** Wednesday, 10 April 2019 3:08 PM  
**To:** medboardconsultation  
**Subject:** Proposed guidelines

Hello

I wish to voice my concerns over the consultation process to produce guidelines which potentially threatens to severely impact the practice of Integrative Medicine in Australia and negatively reduce the treatment options for many patients.

Listed below are some points to support my argument.

The grouping of integrative medicine with 'unconventional medicine' and 'emerging treatments' may create the impression of being "fringe" rather than evidence-based

Many of the terms used in the rationale such as 'unconventional medicine', 'inappropriate use' and 'emerging treatments' leads to ambiguity and uncertainty

The term 'complementary medicine' also includes access to traditional medicines

No evidence produced in the discussion paper quantifies risk in practicing complementary or integrative medicine vs 'conventional' medicine

There was NO consultation with the Integrative Medicine or complementary medicine community before the document's release

The current Good Medical Practice: A Code of Conduct for Doctors in Australia already adequately regulates doctors' practise and protects patient safety. There is no need or justification for a two-tiered approach

- The right of patients to determine their own medical care is under threat
- The lack of clarity on how to determine what is 'conventional' versus 'unconventional' can be misused by people with professional differences of opinion which results in troublesome complaints

I urge you to give these points full consideration during the consultation process.

Kind regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 11 April 2019 12:12 PM  
**To:** medboardconsultation  
**Subject:** Fw: Proposed guidelines

Further to my email yesterday, I add the following comments to highlight our family's specific reliance on Integrative Medicine practice and the availability of compounding pharmacies.,

My wife and daughter are both ill with chronic medical conditions which have not responded well to "conventional" medical treatments. Their immune systems are so severely compromised that they mostly always experience negative side effects from a range of prescription drugs which are meant to ameliorate their symptoms.

Before the advent of "Big Pharma" with their mass production of (often synthetic) drug therapies, pharmacology in the hands of the local pharmacist often relied on the "hands on" compounding of the prescribed medication.

I acknowledge that there is a need to identify and exclude practices that offer treatments which might loosely be referred to as "quackery", but cannot enunciate too strongly the point that a true practitioner of Integrative Medicine is not only university qualified (holding degrees M.B., B.S.), but is a doctor who has devoted countless years of study/research to further develop her/his understanding of human health in the context of the environment, thereby adopting a holistic approach to the provision of their services. The taking of an in-depth case history is an integral part of this approach, allowing a more "tailored" treatment strategy, which can include the prescription of medications compounded from natural, rather than synthetic ingredients (which had previously caused negative side effects for the patient) .

In the light of the information provided, I ask that your proposed guidelines be developed having given full consideration to the points I have made.

Thank you for your time.

Kind regards

[REDACTED]

----- Forwarded message -----

**From:** [REDACTED]  
**To:** [REDACTED]  
**Sent:** Wednesday, 10 April 2019, 3:17:32 pm AEST  
**Subject:** Fw: Proposed guidelines

----- Forwarded message -----

**From:** [REDACTED]  
**To:** "medboardconsultation@ahpra.gov.au" <medboardconsultation@ahpra.gov.au>  
**Sent:** Wednesday, 10 April 2019, 3:07:45 pm AEST  
**Subject:** Proposed guidelines

Hello

I wish to voice my concerns over the consultation process to produce guidelines which potentially threatens to severely impact the practice of Integrative Medicine in Australia and negatively reduce the treatment options for many patients.

Listed below are some points to support my argument.

The grouping of integrative medicine with 'unconventional medicine' and 'emerging treatments' may create the impression of being "fringe" rather than evidence-based

Many of the terms used in the rationale such as 'unconventional medicine', 'inappropriate use' and 'emerging treatments' leads to ambiguity and uncertainty

The term 'complementary medicine' also includes access to traditional medicines

No evidence produced in the discussion paper quantifies risk in practicing complementary or integrative medicine vs 'conventional' medicine

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- The right of patients to determine their own medical care is under threat
- The lack of clarity on how to determine what is 'conventional' versus 'unconventional' can be misused by people with professional differences of opinion which results in troublesome complaints

I urge you to give these points full consideration during the consultation process.

Kind regards

[Redacted Signature]

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**From:** [REDACTED]  
**Sent:** Saturday, 29 June 2019 6:43 PM  
**To:** medboardconsultation  
**Subject:** Fw: Consultation on complementary and unconventional medicine and emerging treatments

To: The Medical Board of Australia

I choose Option 1: "no new regulations are required for doctors practising in the areas of complementary medicine and integrative medicine."

I would simply not be alive today, had it not been for treatment I received from Integrated Medicine (IM) Practitioners and Complimentary Medicine. It is imperative the committee hears this and takes notice, as there are tens of thousands of Australians just like me. I know unequivocally, I would have died.

Please don't misinterpret my comments. I value the vital role conventional medicine plays in our well-being. It is excellent at treating acute/simple illnesses and traumas and giving immediate medical treatment to alleviate symptoms. In my experience however, **conventional medicine fails miserably at dealing effectively with chronic and/or complex ill health.**

Conventional Medicine simply doesn't afford the time that's needed, the knowledge, training, or holistic thinking that's required to *truly* help those battling chronic and/or complex illnesses. The conventional medical model often fails in diagnosing unexplained/mysterious ailments. It fails in its haste to treat symptoms with only pharmaceuticals. It fails to give adequate attention to nutrition, lifestyle or environmental factors. And it fails to provide sufficient prevention strategies or education.

The number of people using alternative approaches and complimentary medicine to help manage their health swells daily and there's a reason for that. The drug model is simply not working and new approaches to medical care are desperately needed. People are moving away from the "there's a pill for that" solution coming at the end of a 10-minute consult. People are wanting more from their doctors. Specifically, more time, more understanding of causes of illness. More power to understand the ways in which they can improve their health to reduce the need for drugs, surgery and medical appointments.

I have concerns about the proposed regulations for a number of reasons. Firstly, it's the conventional medicine model that needs re-working, not the integrative one. Safety is essential and the current guidelines which all doctors work under, appropriately protect patients. Adding a new set of regulations on top of the existing ones is likely to lead to confusion and will not provide any further protection for patients. *There is no demonstrated need to regulate*

*Complementary Medicine or Integrative Medicine. These are safe practices that need no further regulation.*

The other main area of concern is the unethical conflict of interest regarding board members.

The Medical Board of Australia includes members of the Friends of Science in Medicine, a political lobby group opposing Complementary Medicine and Integrative Medicine. *This is a clear conflict of interest!* The Medical Board of Australia should cancel the current consultation. It should start again with all current and past members of the Friends of Science in Medicine lobby group excluded from Board participation.

I am passionate about this topic because I literally owe my life to Integrated and Complimentary Medicine. Any hindrance to these modes of health care would have a such a devastating impact on so many of us that are experiencing chronic/complex ill health.

A brief background of my experience with Integrated Medicine:

I had suffered for years with excruciating pain, severe fatigue and a myriad of other debilitating symptoms that were progressively getting worse. Conventional doctors had given me the diagnoses of Chronic Fatigue Syndrome and Fibromyalgia accompanied with; "Sorry, we don't know the cause and there is no cure, here's some antidepressants and Lyrica". GP's offered no hope of recovery and harsh pharmaceuticals provided me with little relief. I could not endure the suffering much longer.

Thankfully, instead of ending my life I sort treatment with IM practitioners. The IM Practitioners and Naturopaths asked more comprehensive questions, did different and more extensive testing. More due diligence was given to analysing correlations between my symptoms and to search for the root causes. As a result, I was given new diagnoses and started on new treatments and protocols and that's when the shift happened. To my great relief, I finally started to see small improvements in my health and have hope again for the future.

One of the conditions I suffer from is Chronic Inflammatory Response Syndrome (CIRS) due to water-damaged buildings. I found no assistance at all from GP's or specialist for this condition. *Only Integrative Practitioners have helped.*

The IM approach to being healthy focuses on improving a patient's health in all areas of life, including nutrition, exercise, environment, work or school and mental health. Medical students and young doctors are starting to question aspects of the conventional approach and are keen to learn about other ways of treating patients and preventing disease. The field is growing rapidly, and Integrative Medicine provides a model for the future of Australian Medicine.

**Seriously, don't send us back into the dark ages, don't comprise a patient's ability to access the healthcare of their choice. Don't harm Australians by implementing unnecessary and convoluted regulations on Integrated and Complementary Medicine!**

Signed ... a very worried patient





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**From:** [REDACTED]  
**Sent:** Thursday, 27 June 2019 9:28 AM  
**To:** medboardconsultation  
**Subject:** Consultation on complimentary treatments

Dear sir

In 1999 after many, many months of trying to diagnose my health problems, my GP sent me to a Naturopath. After several blood analysis tests etc it was discovered I had several food intolerances and thyroid problems, amongst other conditions. The food intolerances were relatively Easy to control and my Doctor and Naturopath worked together in treating these and other conditions.

Unfortunately my thyroid couldn't be treated conventionally because I was within "normal" Range" set down the medical board.

After 20 years of working together with my GP and Naturopath, over many health issues, As I react to conventional medications, I still have thyroid issues but cannot access the Appropriate treatment my Naturopath, in consultation with my GP, would like to offer because Drs are NOT ALLOWED to prescribe Hormonal treatments according to the governing body. This I find incredible as they already DO for menopausal women.

I was under the impression doctor's assessed their patients on an individual basis and, Sometimes in consultation with others, chose the appropriate course of action for their patient.

The fact that over a period of time I have had GPs refer me to Naturopaths tells me the two can work together for the benefit of the patient and as natural medicines were being used centuries before now I cannot see why this pathway cannot be intergrated and used together in the future.

My heart specialist is also using complementary integrative medicines for blood pressure and cardiovascular health. Does that mean he won't be able to continue this treatment?

I am alarmed that Naturopaths, who are highly trained, certified and registered are being treated In such a way as to have their profession challenged. Sure get rid of the unregistered, shonky practitioners but please "don't throw the baby out with the water."

I have nothing but respect and confidence in both my GP and my Naturopath working together For a beneficial healthy outcome.

Please think carefully and consult with Naturopaths before bringing down your decision!!

Yours faithfully,  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, 30 June 2019 10:47 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

I choose Option 1: "no new regulations are required for doctors practising in the areas of complementary medicine and integrative medicine."

I have chosen to see Integrative Medicine doctors because I suffer from a number of complex and chronic health issues including Chronic Inflammatory Response Syndrome (CIRS) due to water-damaged buildings and multiple stealth infections, including tick-borne infections. Prior to seeing my first integrative doctor in 2016, I consulted with a number of conventional GPs and allied health professionals about my health issues, none of whom were able to effectively diagnose or treat me. It is only because of the knowledge and skills of the integrative doctors I have seen over the last three years, along with the extra time they have been willing to spend with me at appointments, that I now have a clear understanding of the root causes of the health issues I have been struggling with and am finally on the road to recovery.

Working with integrative doctors has enabled me to be far more involved in my own care. Integrative doctors have more in depth knowledge than conventional doctors about topics such as functional nutrition and gut health, and are able to effectively advise their patients on the many things they can do outside of appointments to support their recovery and prevent other health issues from arising in the future. The knowledge I have acquired from my current and previous integrative doctors has helped me feel more empowered and positive about my ability to influence my own recovery. This has improved not only my physical health but my mental health as well.

One of the many consequences of the health issues I am dealing with is an increased sensitivity to chemicals and pharmaceutical drugs. As a result, I much prefer non-drug approaches for managing my health. While the integrative practitioners I have seen are willing to prescribe pharmaceutical drugs when necessary, they have in most cases given me a choice between drugs and suitable non-drug alternatives. They have clearly explained the pros and cons of each so that I have been able to make an informed choice. In most cases, conventional doctors do not have knowledge of safe and natural alternatives to pharmaceutical drugs and are not in a position to offer patients with complex and chronic health issues anything other than drugs to help alleviate symptoms. I am far more interested in treating the root causes of my illnesses and making a full recovery than being on drugs for the rest of my life and dealing with unpleasant or harmful side effects.

While I'm happy to see my conventional GP for simple treatments and routine tests such as pap smears, my complex health issues require a much wider range of diagnostic and treatment options, not to mention longer appointment times, than my GP could ever hope to offer. Without access to integrative doctors and the tests and treatments they provide, I have no doubt that both my physical health and mental health would be considerably worse than they are, and that I would have long ago lost hope of ever making a full recovery and once again being a contributing and engaged member of society.

I have concerns about the proposed regulations because:

- There is no demonstrated need to regulate Complementary Medicine or Integrative Medicine. These are safe practices that need no further regulation.
- The only concern of the Medical Board of Australia in this process is, and should be, safety. The Chair has said this publicly. Questions about how effective Complementary Medicine and Integrative Medicine is should be a decision left to me.
- The Medical Board of Australia includes members of the Friends of Science in Medicine, a political lobby group opposing Complementary Medicine and Integrative Medicine. This is a clear conflict of interest. The Medical Board of Australia should cancel the current consultation, and go back to the start with all current and past members of the Friends of Science in Medicine lobby group excluded from Board participation.
- There has been no transparency in consultation process. Freedom of Information requests as to how these proposals originated have been denied or redacted. The Medical Board of Australia has acted in secrecy and a failure to disclose the details of why the new regulations.

Sincerely,

A solid black rectangular box used to redact the signature of the sender.

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**From:** [REDACTED]  
**Sent:** Tuesday, 30 April 2019 10:07 AM  
**To:** medboardconsultation  
**Subject:** Medical Board Submission

30.04.19

Good Morning

Regarding the public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments.  
As an Australian citizen I feel it's important that I have the freedom of choice in the type of medical care that I use to address my chronic health issues.  
I have been suffering from adrenal fatigue and conventional medical doctors have not been able to successfully treat my condition and bring me to a satisfactory level of health.

Pharmaceuticals and the use of conventional methods simply did not work and in some instances caused side effects and seemed to waste Medicare funds and resources.  
It was only when I saw an integrative medical doctor who included lifestyle changes, diet and supplements of vitamins and minerals to address my problems that my condition began to improve.

If I cannot see an integrative Doctor or the Doctor restricted in what he or she is able to prescribe for me, I feel that my health will once again deteriorate which in turn will impact my family my work and my general well-being.

Concerned citizen

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 7 March 2019 10:19 AM  
**To:** medboardconsultation  
**Subject:** REGULATION OF MEDICAL PRACTITIONERS

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**Subject:** REGULATION OF MEDICAL PRACTITIONERS

As an Australian citizen I feel that I should have the right to choose the methods I use to address my chronic health issues.

Conventional general practice has not been able to successfully treat my condition nor bring me to a satisfactory outcome.

My condition remained unchanged and gradually became more chronic until I consulted with an integrative medical doctor who included lifestyle change, diet and supplements to address my problems.

If I cannot see an integrative doctor, I feel my health will deteriorate and have a continuing impact on my family, work and my well being.

Concerned

[REDACTED]  
7 March, 2019

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**From:** [REDACTED]  
**Sent:** Tuesday, 5 March 2019 8:19 AM  
**To:** medboardconsultation  
**Subject:** Medical Board Submission

Medical Board Submission

Regarding the public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments

As an Australian citizen/resident I feel it's important that I have the freedom of choice in the type of medical care that I use to address my chronic health issues.

I have been suffering from Coeliac and other related Autoimmune diseases.

Conventional medical doctors have not been able to successfully treat my conditions and bring me to a satisfactory level of health.

Pharmaceuticals and the use of conventional methods simply did not work (and in some instances also delivered unwanted side-effects in my case) and, seemed to waste Medicare funds and resources. The honest truth here is it nearly destroyed me!

It was only when I saw an integrative medical doctor who included lifestyle change, diet and supplements of vitamins and minerals to address my problems that my condition began to improve.

If I cannot see an integrative doctor, or the Doctor is restricted in what he or she is able to prescribe for me, I feel that my health will deteriorate and have a continuing impact on my family, my work, and my wellbeing.

Signature: [REDACTED]

Date: 05/03/2019

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**From:** [REDACTED]  
**Sent:** Tuesday, 5 March 2019 5:55 PM  
**To:** medboardconsultation  
**Subject:** Medical Board Submission

Medical Board Submission

Regarding the public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments

As an Australian citizen I feel it's important that I have the freedom of choice in the type of medical care that I use to address my chronic health issues.

I have been suffering from: Arthritis and immune disorders

Conventional medical doctors have not been able to successfully treat my condition(s) and bring me to a satisfactory level of health.

Pharmaceuticals and the use of conventional methods simply did not work (and in some instances also delivered unwanted side-effects in my case) and, seemed to waste Medicare funds and resources.

It was only when I saw an integrative medical doctor who included lifestyle change, diet and supplements of vitamins and minerals to address my problems that my condition began to improve.

If I cannot see an integrative doctor, or the Doctor is restricted in what he or she is able to prescribe for me, I feel that my health will deteriorate and have a continuing impact on my family, my work, and my wellbeing.

Concerned,

Name: [REDACTED]

Signature: [REDACTED]

Date: \_\_05\_\_/\_03\_\_/\_2019\_\_

Occupation: \_\_\_\_\_(optional)



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**From:** [REDACTED]  
**Sent:** Tuesday, 9 April 2019 4:38 PM  
**To:** medboardconsultation  
**Subject:** Chronic illness

To whom it may concern,

I have suffered from severe fatigue and pain for over two years , the conventional GP has told me to go away and wait until I get better where as the functional GP's I have seen have been interested and caring enough to try and find the root cause of my reaction to a vaccine I had in Dec 2016 which has taken away my ability to work, travel or enjoy time with my family. I do not see any development in conventional medicine to treat chronic illness and only see evidence of symptom suppression using drugs. This surely is not the way forward for Doctors that must be continually frustrated with their lack of success in this area.

New developments with treatments and holistic approaches to treating chronic illness are surely the way forward and should, chronic and mystery type illnesses are increasing annually and a better approach to treating them is very much overdue.

Kind Regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, 14 April 2019 11:25 PM  
**To:** medboardconsultation  
**Cc:** [REDACTED]  
**Subject:** 'Consultation on complementary and unconventional medicine and emerging treatments'

**Consultation on complementary and unconventional medicine and emerging treatments**  
**Submission from Sharyn Low.**

To Whom it may concern:

I am [REDACTED], aged 64 and resident of NSW.

I wish to raise my concerns with the proposal for clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments.

I would prefer Option 1:

*Option 1 - Retain the status quo of providing general guidance about the Board's expectations of medical practitioners who provide complementary and unconventional medicine and emerging treatments via the Board's approved code of conduct.*

1. Background:

I am a sufferer of chronic complications and side effects of 'Lyme Like Illness' diagnosed in 2013 with 2 co infections:

- Confirmed diagnosis *Lyme borreliosis*, and *Babesiosis (B. duncani)* 29 July 2013 through IGeneX Laboratory CA, USA.
- Confirmed diagnosis *Mycoplasma fermentans* was made by Australian Biologics test July 2012.

Complementary and other therapies were critical to my treatment and recovery, specifically:

- long term antibiotics specific to *Borrelia* and 2 other co infections I had.
- Medical Advice on supplements to aid in healing and recovery, such as Pre and Post Biotics like 'Probex', 'Mutaflor' and Natural HRT Crème from Compounding Pharmacy as it is natural, tailored for me, and doesn't go through stomach and intestinal system.
- 'Pro Lo Therapy' injections to treat my damaged joints and ligaments. I have less pain overall, and more mobility in the joints treated.

These treatments have always been offered with full discussion of merits and problems; and used in conjunction with 'conventional' treatment methods. In my treatment, some conventional treatments were not successful or had more side effects.

2. My Doctor has always provided full information, discussed any diagnostic tests before being ordered, and used conventional treatment first. I have been happy to pay out of my own pocket additional expenses for alternate therapies and tests which are often not available under Medicare or private health insurance. I am also acutely aware that I am fortunate to have such a Doctor with the knowledge and experience, and that many patients are not so fortunate.
3. I believe patients should have the free choice of complementary and unconventional medicine and emerging treatments.

4. I am concerned that if the Medical Board of Australia (MBA) proposed regulation of medical practitioners providing complementary medicine - option 2 is adopted, many of the complementary therapies relied on by myself and many other patients might not be available.
5. The proposed regulation in Option 2 would impose additional administrative duties on to the medical profession so fewer Doctors would be likely to offer integrative complementary therapies. I believe it would increase the cost of medical care. Patients will suffer with their health and financial ability to pay.
6. I believe the medical profession should be encouraged and supported to inform themselves about complementary, alternate medicine and emerging treatments different to mainstream conventional treatments rather than regulated. The proposal for Option 2 is taking an academic view of medicine rather than real practitioner experience of dealing with emerging illnesses which academia has yet to understand, acknowledge and research.
7. The proposal is discriminatory - Why should some Doctors practice under a more strict regime of administration and regulation? Why should some patients who struggle to get medical treatment now be faced with less choice and more expensive medical care?
8. I would like to know about the 'complaints' received about complementary and alternate treatments – how do they compare to the rate of complaints for 'standard conventional care'? could these cases be dealt with under the existing measures for good medical practice?

**Please withdraw the option 2 proposal and retain the status quo – and our rights to choice and health care.**

Yours sincerely

[Redacted signature]

[Redacted signature]

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**From:** [REDACTED]  
**Sent:** Tuesday, 12 March 2019 3:54 PM  
**To:** medboardconsultation  
**Subject:** Restrictions on complimentary healing

To whom it may concern

Your proposal infringes upon the rights of educated people who choose to seek treatment outside the realm of your average gp.

Alternative therapies are rarely the first line of enquiry when health failures occur. It is usually in desperation that one turns to integrative medicine. Firstly it is expensive, secondly it usually requires extra effort on behalf of the patient. Please focus your attention on improving the health service to all Australians, and recognise that the current services are extremely limited with the 'there's a pill for that' type of solution, which does nothing to correct the cause of the problem, and is unnecessarily costly to the health care system and tax payer.

My health concerns are chronic in nature, and solutions have not been found in conventional medicine. By utilising 'alternative' treatments by qualified therapists at my own expense, I am able to continue working and paying tax and avoid being a liability to an already struggling social welfare system.

Please be brave and resist the bullying by pharmaceutical companies and medical professionals whose profits are contingent upon society's ill health. Let those who prefer to take a cocktail of medications continue to do so blindly, but please allow the rest of us who have researched and found solutions elsewhere the liberty to continue.

In closing, when I cast my vote, the party proposing this will be my last choice.

With kind regards

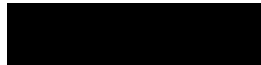
[REDACTED]

Sent from my iPad

## Regulation of Medical Practitioners

4/4/2019

Name:



Occupation: Business Owner

As an Australian citizen I feel I should have the right to choose what methods I use to address my health issues.

I have been suffering from a painful knee joint and lack of mobility in the knee.

Conventional medical doctors have not been able to successfully treat my pain or improve my mobility. Prescribed medication did not work and this seemed a waste of my time and Medicare funds.

However, once I saw an integrative medical doctor who included changes to my lifestyle, my diet and supplements to address my problem, my condition improved remarkably.

If I cannot see my integrative doctor, I feel my condition will deteriorate and have a continuing impact on my family, my work and my health.

A concerned citizen

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**From:** [REDACTED]  
**Sent:** Friday, 22 February 2019 2:06 PM  
**To:** medboardconsultation  
**Subject:** Regulation of Medical Practitioners

# Regulation of Medical Practitioners

As a tour operator and an Australian citizen I feel that I should have the right to choose which methods I use to address my chronic health issues.

I have been suffering from exposure to mould. The effects take many years of correction through integrative medicine

Conventional general practice has not been able to successfully treat my conditions and bring me to a satisfactory outcome.

My condition gradually became more chronic until I consulted with an integrative medical doctor who included lifestyle change, diet and supplements to address my problems.

If I cannot see an integrative doctor I feel that my health will deteriorate and have a continuing impact on my family, work and well-being.

Concerned,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]