



CHINESE MEDICINE & ACUPUNCTURE SOCIETY OF AUSTRALIA LTD

1F 23 John Street Cabramatta NSW 2166 **Email:** cmasatcm@hotmail.com **Tel:** +61 2 9727 6831

Dr Harry Yu Wu (CM)
1F 23 John Street
Cabramatta NSW 2166
Email: president@CMASA.org.au
Tel: +61 2 9727 6831

04-April-2021

Executive Officer
Medical, Ahpra
GPO Box 9958
Melbourne 3001

To Whom It May Concern

Dear Sir/Madam

Thank you for giving the opportunity to the general public to share their comments on the draft. On behalf of our association, I would like to give our feedback to the questions raised as followed:

- 1. From your perspective, how is the current standard working?*

Compared to the qualification standard recognized by Chinese Medicine Board of Australia (CMBA), the current standard is insufficient to protect the health benefits of the general public who are seeking acupuncture services.
- 2. Is the content and structure of the draft revised standard helpful, clear, relevant and more workable than the current standard?*

The draft revised standard might be more workable than the current one, but it has not changed the situation that the benefits of the general public have been compromised by both standards.
- 3. Is there any content that needs to be changed, added or deleted in the draft revised standard?*

As mentioned above, the Medical Board (MBA) should follow the same standard which was set up by CMBA to endorse GPs to practise acupuncture.
- 4. Are there any impacts for patients and consumers, particularly vulnerable members of the community that have not been considered in the draft revised standard?*

Yes, if they are using acupuncture services.
- 5. Are there any impacts for Aboriginal and Torres Strait Islander Peoples that have not been considered in the draft revised standard?*

Yes, if they are using acupuncture services.

6. *Do you have any other comments on the draft revised standard?*

6.1 The accreditation standards set up by either MBA or CMBA for those who want to practise acupuncture in Australia should be the same, therefore the safety and service quality of the general public will not be compromised. Non-CMBA registered medical practitioners should follow the same accreditation standards, which include:

- 1) Bachelor's degree in Chinese medicine or acupuncture
- 2) Passing the Chinese Medicine Board's registration qualification examination
- 3) 20 hours of CPD per year

6.2 Compared to Conventional Medicine, Acupuncture is far beyond just putting a needle into an anatomical spot or a trigger point. Without proper understanding of Chinese Medicine theory and pattern differentiation, without sufficient training in needle technique, the practitioner won't be able to provide authentic Acupuncture. Consider that the current accreditation standard is that GPs who complete an acupuncture-training course of only 270 hours can be registered as medical acupuncturists by the MBA, while CMBA registered acupuncturists are required to get four-five years' full time study and training, the difference of requirements between these two groups is significant.

6.3 We strongly recommend the MBA to consider raising the accreditation standard to the same level of the CMBA's to protect consumers' benefit. If one "Acupuncturist" got his title after 4 years' training while another "Acupuncturist" got his title after 270 hours' training, this will likely cause confusion and misunderstanding to the consumers.

Regards

Sincerely Yours



Dr. Harry Yu Wu (CM)

President,

Chinese Medicine and Acupuncture Society of Australia (CMASA)