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**From:** [REDACTED]  
**Sent:** Tuesday, 25 June 2019 11:11 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments

To The Executive Officer, Medical,  
AHPRA,  
GPO Box 9958,  
Melbourne 3001.

Dear Sir/Madam,

I am writing to you to request that we keep Option 1 as the preferred option for the Medical Board.

I have found current conventional medical practices lacking in certain areas of patient treatment, with no solutions offered outside the box.

I am a parent of a child diagnosed with Graves Disease at the early age of 14, and after 2 years of conventional treatment from an endocrinologist, with regular blood tests, her thyroid antibodies would not decrease even when testing had shown that the thyroid was no longer over active. I was offered two options for my child by the endocrinologist, stay on the thyroid suppressing medication for the rest of her life or have the radioactive iodine treatment, and have the thyroid hormone for the rest of her life. Both options were not acceptable to me, considering that my daughter was only 16 years old and that this would be a lifelong decision.

It was suggested to me by friends and family, that I consult an Integrative Doctor, as there were apparently other options that I was not at that point in time aware of. The fabulous Integrative/Complementary medical Doctor we consulted began a new treatment regime for my daughter and her thyroid antibodies began to decrease significantly within 3 months of the new treatment regime, and every subsequent blood test would show a reduction of the thyroid antibodies. By 12 months, her thyroid antibodies were reduced down to what is considered normal levels. We would not be at this level if it wasn't for the Integrative Doctor, and my daughter has not had to have the thyroid suppressing medication in over 18 months. In fact with the new treatment regime that she has, she does not suffer all the coughs, colds and viruses that the rest of the family have had over the past 2 years.

I would really urge you to adopt Option 1 as I would like be able to choose my treatment options for both myself and my family.

Yours Sincerely,

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, 15 April 2019 2:31 PM  
**To:** medboardconsultation  
**Subject:** Freedom of choice for health care

I wish to have my Doctor to be able to give me a choice. I use alternative medicine, and have been using it for 30 years.

My husband is 97 and has also has been using alternative medications for over 30 years.

I am allergic to some medications and find alternative medications are most helpful to me and this where my Doctor needs the freedom to advise on alternatives.

I do not want to be dictated to or told by some who doesn't know me, as to what supplements I can tolerate.

I feel this if it goes ahead would be a backward step.

[REDACTED]



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**From:** [REDACTED]  
**Sent:** Wednesday, 26 June 2019 2:42 PM  
**To:** medboardconsultation  
**Subject:** medical practioner guidelines

We wish to bring to the attention of Medical Board how important it is for our family to have a Dr who practices Naturopathy as well as medicine.

Health and the health of ourselves, our aged parents Children and Grandchildren is so much better by introducing the wisdom of Naturopathy from our Doctor.

A Few examples, My Husband suffered reflux, Nexium was damageing to him.

However Probotics solved the problem.

Two Grand children suffering depression, are so much better with the use of correct vitamins.

The use of natural oils for massage helps My Very Crippled Mother.

Skin and complexion improvements are notice by many who take advice of a Dr who does both medical and naturopathy.

Its a big advancement for patients to be saved from some of the damaging drugs handed out so freely.

High Blood Pressure was reduced by diet instead of pills.

This is but a few examples why We feel Doctors can practice both forms of health.

Thank You [REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 4 April 2019 9:28 AM  
**To:** medboardconsultation  
**Subject:** Grouping of unconventional medicines

Good morning,

It has been brought to my attention that there's a risk that integrative medicine may be grouped with "unconventional" or "emerging treatments". As an individual and as a parent who has benefitted greatly from integrative medicine, I feel deeply concerned and alarmed. The only explanation for doing something like this would be out of ignorance.

Before starting my son (now 14) at age six on KPU, we were in and out of the GP constantly with asthma attacks. He's been put on an asthma plan by one of our GPs whereby the school was administering ventolin up to three times throughout the day. The ventolin and flixotide was having side effects of anxiety, oral thrush and eczema. But these side effects were nothing compared to another asthma medication prescribed to him when he was 3-4 years old. Singulair. I became very concerned when my tiny child started talking to me about how he wanted to be dead, experiencing terrible nightmares, shaking with anxiety and seeming to hallucinate. Fortunately for me, I linked the medication as a possible cause. Of course, the dangerous effects of this "approved" and "credible" medication are now well publicised. All my friends' kids with asthma were on the same drug at the time and when I rang around to tell them to take their kids off straight away, they reported similar noticings in their children. One of those mothers still thanks me every time I see her.

So you can imagine my absolute relief through introducing KPU to my son that his previously constantly compromised immune system has strengthened and within six weeks of being on his integrative doctor's program we were able to reduce his ventolin and flixotide down to none. I remember him saying to me as I walked him up to school, "I don't know why mum, but I just have more energy lately". Oh, yes, and the constant meetings with the school about potential "red flags" around being high on the spectrum also stopped. He felt happier within himself and is growing up to be a much more resilient child.

Seeing my son's improvement, my husband also went to get tested for pyroles and also started the therapy. His change was incredible also. He was more confident, happy and performed better at his sports. Seeing both my son and husband's improvement, I also got tested. Turns out, I benefitted too.

Since all of this, whenever there's a health problem that arises that my local GPs can't fix, I make the effort to drive the 3 hour round trip to visit our incredible family integrative medical doctor.

Last year, our local GPs diagnosed my second son with a parasite. They prescribed the antibiotic Flaxyl twice to fix it. Turns out that is the standard recommended treatment, but sadly it's well documented that it doesn't work - in fact it can make it worse. Well, my son got MUCH worse. We had some incredibly dangerous moments with him. At the peak, he had six weeks off school. I thought there was nothing I could do. I had asked for a referral to a specialist, but I thought I'd visit our integrative medical doctor in the interim. Turned out, there was an antibiotic that worked - it just needed to be compounded and most standard GPs didn't know how to prescribe it. He got better and has been able to consistently attend school and resume all other sporting activities since. By the time we saw the paediatrician (who I actually considered reporting to the AMA for some very odd behaviours), he was already better.

I will always visit my local GP. I'll also always endeavour to seek out a specialist. I'm super grateful for the amazing hospital we have not far from here - they were amazing when one of my sons fractured his skull during a pogo stick accident, but when it comes to solving problems that aren't the run of the mill, nothing has helped me more than integrative medicine. Naturopaths, while well intending + often great at assisting with tips around diet adjustments,



are just not the same. Rather than group integrative doctors with complimentary medicine, perhaps you need to consider elevating them to a more “specialist” area of medicine.

My life and my family’s lives would not be the same today if it wasn’t for our integrative medical doctor and the additional support from our compounding pharmacist.

I’m happy to speak further on this topic.

Kind regards,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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**From:** [REDACTED]  
**Sent:** Friday, 12 April 2019 4:29 PM  
**To:** medboardconsultation  
**Subject:** Fwd: Fwd: Consultation on complementary and unconventional medicine and emerging treatments

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**Subject:**  
**Date:**  
**From:**  
**Reply-To:**  
**To:**

I apologise for making a mistake in the address. This email bounced back to me. [REDACTED]

----- Forwarded Message -----

**Subject:** Consultation on complementary and unconventional medicine and emerging treatments  
**Date:** Wed, 10 Apr 2019 15:16:24 +1000  
**From:** [REDACTED]  
**Reply-To:** [REDACTED]  
**To:** [medboardconsltation@ahpra.gov.au](mailto:medboardconsltation@ahpra.gov.au)

Dear Consultation Members

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

As an Australian citizen I believe I have the freedom of choice in the type of medical care that I use to address my chronic health issue of Lyme disease and its co-infections.

I am a 69 year old happily married woman. I have always been involved, active and fit, enjoying gym workouts and looking after a large steep garden until 4 years ago when I became very unwell, with strange and random symptoms, including a sudden revulsion to all meat which previously I've always enjoyed.

My lovely and long time GP was unable to diagnose my problem. I felt like a self-absorbed hypochondriac trying to describe the symptoms and how unwell I felt. It definitely wasn't depression, I love my life. Coming to no conclusion at all, and feeling miserable and mystified until my sister (who had just been listening to a radio interview about Lyme disease) encouraged me to investigate Lyme disease.

I researched online the Lyme Disease Association of Australia (LDAA), and the Australian Chronic Infectious Disease Society Guidelines (ACIDS). It was a breakthrough for me, both a relief but also quite frightening if I wasn't treated. Reading the LDAA's "What are the symptoms of Lyme disease?", I felt overwhelmingly relieved, and not alone. Suddenly I was reading symptoms I'd had difficulty describing. Amongst the most worrying symptoms I had was inexplicable feelings of rage. I had given up driving because of brain fog and an inability to make quick decisions. But now....hooray....I had a lead!

I had also had sensations of blackouts and faintness, resulting in all sorts of heart tests, and all leading nowhere as

no problem showed up! I told my GP I suspected I had Lyme. She was kindly sceptical but did send off for a blood test. It came back negative as I now know that the general laboratories here in Australia are not set up for testing for the Lyme bacteria and it's associated co-infections. These tests have always been sent to the US or Germany.

I emailed LDAA asking if they knew of a "Lyme aware GP" here on the [REDACTED]. They did! Three in fact.

I thank God for my "integrative doctor". I know I would be in dire straights otherwise.

I have now been diagnosed with three tick born bacteria....rickettsia, bartonella, and borreliosis (which is known outside Australia as the Lyme Disease). By the time of my diagnosis I had been ill for almost a year so it had become chronic. The treatment with anti-biotics is long and drawn out, with many sufferers taking years to recover.

I, my husband, family and friends are very relieved my mysterious illness has been solved and that I'm being treated. We're also very grateful to have my wonderful "Lyme aware" doctor right here on the [REDACTED]. I trust her. She attends conferences when she can, keeping up with the International scene of research, diagnosis and treatment of Lyme and it's associated co-infections. The US and Germany are at the forefront.

My illness originated here on the [REDACTED], where I was bitten by 'nymph' stage ticks in my garden.

I wonder how many other folk in Australia are suffering, undiagnosed. I suspect there are many....gardeners, bush walkers, campers, even our Defence Forces.....living with depression and anxiety because there's no diagnosis available for them....could PTSD be contributed to by these insidious tick bacteria?

I know if I had not been diagnosed, and now being treated, I would be getting worse and worse as my body was taken over by the bacteria. I would be costing the health system because I could possibly become disabled and need caring. I say this because I know of folk in a bad way physically and mentally after suffering undiagnosed Lyme for years.

In the light of my experience, TWO of the paragraphs in your draft guidelines trouble me (I have asterisked two points with my added comments):

"The draft guidelines aim to prevent harm that may occur directly from the complementary and unconventional medicine or emerging treatments or indirectly, from delays in accessing other treatments."\* "While some treatments may be beneficial, others may have no effect, the benefit may be uncertain, or the effect may be harmful physically, psychologically or financially." \*\*

Your "proposed definition that includes.....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."

\*Conventional medicine delayed my being diagnosed so condition became chronic. \*\* I'm sure you would agree that there is sometimes harm and addiction from recognized conventional medicine, such as addictions to pain killers and anti-depressants, both of which I'd be dependent on now if I hadn't had the correct diagnosis.

Yours sincerely

[REDACTED], [REDACTED]

Tel: [REDACTED]

Occupation: Homemaker

Date: 10th April 2019

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**From:** [REDACTED]  
**Sent:** Sunday, 30 June 2019 10:45 AM  
**To:** medboardconsultation  
**Subject:** Regulation of Medical Practitioners

Name: [REDACTED]

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

I have been suffering from:

H. Pylori (for over 5 years when first diagnosed, at an extreme level)  
Underactive Thyroid  
Stress/Depression (from relationship breakdown and being unemployed for over 9 months)  
Menopause

Conventional general practice has not been able to successfully treat my conditions (above) and bring me to a satisfactory outcome.

My conditions remained unchanged and 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 believe my health will deteriorate and have a continuing impact on my family, my work and my general wellbeing, possibly to a very detrimental level.

Concerned,

[REDACTED]  
30/06/19

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**From:** [REDACTED]  
**Sent:** Tuesday, 5 March 2019 6:53 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments.

To whom it may concern.

I am writing to submit my disappointment of the news the government will be banning doctors from treating patients with Lyme disease, currently my niece is suffering from the devastating disease.

She has been suffering from Lyme disease for the last four years and has suffered both financially as well as mentally. She has also travelled overseas to try and cure this debility disease.

The government can not and should not ignore that new illnesses are being discovered everyday and without unconventional medicine alot of Australians can be misdiagnosed and untreated.

Kind regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, 5 March 2019 5:01 PM  
**To:** medboardconsultation; [REDACTED]  
**Subject:** 'Consultation on complementary and unconventional medicine and emerging treatments'

Re: Consultation on complementary and unconventional medicine and emerging treatments

My name is [REDACTED] I would like like to make a submission to the Medical Board to not ban treatment for Tick born disease or complimentary treatments. I believe I my daughter would not be here had I not received treatment to heal and support my health.

I also believe that it is time that the Medical board offered more support for sufferers who have tick born disease as it is such a denial off treatment and due to the resistance of the Medical Board it has left me and many others isolated and desperate with this debilitating symptoms complex attributed to ticks.

Regards [REDACTED]

To Whom It May Concern,

I'm I sending in this submission as my  
27 year old niece contracted Lyme disease in the U.S.

Without help my niece would not be able to receive any treatment for her Lyme disease, which she is still trying to recover from.

Without this treatment She will have travel overseas, which she has done already. Which has already caused her tremendous emotional, physical and Financial stress.

Kindest Regards

[REDACTED]

## **Consultation document on complementary and unconventional medicine and emerging treatments.**

To the Executive Officer,  
Medical Board of Australia

My name is [REDACTED], I am 55 years of age.

Some of my main health issues are as follows,

- 1.Chronic pain** due to being involved in numerous car accidents. One of these accidents resulted in a C1-C2 atlanto axial joint fracture (hangmans fracture).
- 2.Damaged Lumbar spine, pars defect.**
- 3.Fibromyalgia**
- 4.Depression**
- 5.Labral hip tear**
- 6.Osteo arthritis** from top of spine to the bottom, in hands, feet, ankles, wrists, hips, knees
- 7.Sjogrens Syndrome**
- 8.Intolerances to salicylates amines and gluten.**
- 9.Herpes simplex, chronic**
- 10.Menopause**

As you can imagine the issues that I have had with all the above over the years, at times has been intolerable.

For the Chronic pain these are some of the tablets I have been on

120mg of slow release morphine daily  
20 panadeine forte per day  
Endone  
Tramadol  
Lyrica  
Prednisolone  
Osteo Panadol  
To name a few.

For some of the other issues

Zoloft  
Endep  
Famciclovir

The general prognosis for me was not good, not only with my physical and mental issues that I was going through. But with such high doses of any of the above tablets the side effects were horrific. Some of the detrimental effects that the drugs and ailments had on everything in my life are as follows. My marriage broke down, my judgement was impaired, I could no longer work, my self-confidence was shattered.



When I have an appointment with my Integrative Medical Doctor I am never rushed. There is no 10-minute time limit, which you generally get at the general practitioners. Surprising as it may seem he knows who I am and knows where we are in my treatment without me having to remind him. His knowledge is extensive, and luckily for me he thinks outside the box. With his help I have achieved more in the last 4 years than in the past 20 years.

Since working with my Integrative Medical doctor, he has blended conventional and complementary medicines. My pharmaceutical tablet intake is now only Osteo Panadol and a very reduced dose of Lyrica. No more side effects. I feel better, the pain levels have reduced quite dramatically. My mind is clearer, my ability to think has returned. I generally have a much brighter outlook on life. This has also been commented on by family and friends.

I don't believe that we should have different rules for conventional and integrative doctors, there should only be one set of practice guidelines that would cover both. Whether the doctor is conventional or integrative I believe that I have a right to my own choice of doctor. I can certainly make that decision on my own, without anyone else's help.

Without integrative medicine I do not know where I would be today. Do not take away my right to choose.

Yours Sincerely

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, 24 June 2019 11:04 AM  
**To:** medboardconsultation  
**Subject:** Fwd: Consultation on complementary and unconventional medicine and emerging treatments

I went to many conventional doctors trying to find out what was wrong with me, none were able to help. Some were hostile and unfeeling and seemed angry at me for presenting with something they didn't understand. When I went to an integrative medical doctor he picked up super fast on what was wrong with me. I am so thankful!! He helped save my life and the life of my family. He has been kind and persistent in his ongoing attempts to find me suitable treatments for serious conditions that were brought on by an exposure to microbial contamination. I was having serious haemorrhages, they could have finished my life at any moment. Please do not hinder those who are truly helping. Please if you will guide the medical profession you must also DO NO HARM. We need and want this approach, they have moved with science and understanding, they are not resting on their laurels with outdated teachings and information. They are doing good. Please support them!

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**From:** [REDACTED]  
**Sent:** Tuesday, 23 April 2019 2:35 PM  
**To:** medboardconsultation  
**Subject:** re: opposition to changes to code of conduct 2014

Attn to the Australian Health Practitioner Regulation Agency

Good afternoon

My name is [REDACTED] and I would like to voice my opinion the the proposed changes to the code of conduct 2014.

I have been seeing an Integrative Medical Practitioner for approx 12 years and would like the opportunity to continue doing so. I will briefly outline my reasons for this and the positive affects on my health it has been.

After being with non integrative Dr's in the past and the one prior to 2008 became very stale as to where to go next in the search to find a resolution to my illness I was suffering for approx 2.5 years. His comment to me, after referring me to many specialists, tests and scans, came to me with a comment..he stated, " you have been coming to me with the same symptoms for years now and unless you take the suggested prescribed medication , (antidepressants) then there is no more I can do for you!"

I was not depressed, I was sick! My symptoms were-: chronic fatigue, aches & pains, headaches, burning sensations, just to mention the main.

I was advised by a friend to visit the integrative GP that I'm still seeing today. After reading my files from previous noted discrepancies and acted on them also requesting further blood tests which revealed 4 other causes to my illness. With the aid of prescription medication and alternative medication I was back to my old happy healthy self within a few weeks!

Because I am sensitive to prescription drugs I am more than happy to try alternate medication which nine times out of ten work for me, not that I get ill much these days. In saying that, I am given prescription medication if they are required, IE- mild blood pressure tablets and antibiotics for bacterial infection if ever required.

I regularly take a hormone replacement compound troche and want to have that choice to do so as it works for me with no side effects.

Please do not de-regulate integrative medical practitioners as I thank God for mine!

With regards  
[REDACTED]



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**From:** [REDACTED]  
**Sent:** Friday, 28 June 2019 11:41 PM  
**To:** medboardconsultation  
**Subject:** Proposed new guidelines putting the Integrative Medicine Community at risk.

[REDACTED]

To The Medical Board of Australia,

I write to put forward my absolute belief that no new regulations are required for doctors practicing in the areas of Complimentary medicine and Integrative medicine.  
I have chosen to see Integrative medicine doctors because they were the only doctors who could help me with diagnosis and treatment for my autistic child. He was born in 1969 and had profound developmental problems. I found help for him almost always privately and piecemeal. Speech therapy followed by psychology, an eye clinic, and physiotherapy to help me teach him to shower and dress himself and to feed himself using cutlery and more. At eight years of age in 1978 I took him to an Integrative medical doctor who rapidly diagnosed lupus and coeliac disease. My son was put on an appropriate diet together with appropriate vitamin and mineral supplements and he has never looked back. He got a locksmith apprenticeship at seventeen years of age and is a qualified locksmith and worked in that trade for eight years. He then did an electrical trade apprenticeship and has worked in that trade for many years. He also has qualifications in radio broadcasting and used this trade when a volunteer in [REDACTED]. He is now fifty years of age and his life would have been very different if he had not been treated by an Integrative Medical doctor.  
I was diagnosed twenty five years ago with lupus by an Integrative Medical doctor and have managed this disease with diet and supplements, some of them from compounding chemists. I am seventy five years of age and at this stage I do not take any pharmaceutical drugs.  
We are not self medicated cranks, we do take our health seriously and we do take responsibility for our own health where we can do so. We are healthy fully functioning members of society who wish to continue to have the rights and freedom to be able to have our health monitored and managed by an Integrative Medical doctor.

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

There is what I would call Natural Medicine and there is Pharmaceutical Medicine and it's allied fields of surgery etc and I fail to see how these two forms of medical practice are not complementary and I fail to see how one form should threaten the integrity and validity of the other.

I find the terms 'Unconventional Medicine and Emerging Medicine' insulting and unrepresentative. They do not address the reality of Complementary Medicine or Integrative Medicine in any shape or form. In my opinion these terms are being used to discredit and manipulate and bully and I ask "what is it that you as The Medical Board of Australia get out of such behaviour, such endeavour? It smacks of oiling the pharmaceutical machine.  
I would appreciate acknowledgement of receipt of my email  
Yours sincerely

[REDACTED]

Copy of this letter have been sent to:  
Greg Hunt - The Federal Minister for Health & Dan Tehan - The Federal Member for Wannon and Federal Minister for Education & Louise Stanley - State Member for Ripon, Vic.  
&  
Jenny Mikakos - State Minister for Health, Vic.

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**From:** [REDACTED]  
**Sent:** Thursday, 27 June 2019 9:01 PM  
**To:** medboardconsultation  
**Subject:** Re: Consultation on complementary and unconventional medicine and emerging treatments

Subject: Consultation on complementary and unconventional medicine and emerging treatments

To Ahpra

I need the services provided by my integrative medicine doctor to prevent my body becoming inflamed due to mineral imbalances. This happened quite rapidly a few years ago and I am still suffering some of the ill effects. I have a condition not understood by regular GPs who can't treat something they don't understand in a regular 10 minute appointment.

I trust that you will allow the many people who require this sort of service for a myriad of reasons to continue to receive it. There is greater knowledge in the world about the many diseases acquired genetically or other ways than ever before and it's time more people were able to access this help in a timely manner. A little prevention of the progression of disease could save a lot of money being wasted on more treatments when things get worse.

Regards [REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 12 April 2019 4:42 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging

My name is [REDACTED], I am 68 years old and was diagnosed with Rheumatoid Arthritis in 2017. My local GP referred me to a Rheumatologist who prescribed me with Methotrexate. My research into that drug lead me to believe that it was not what I wanted to take. I read many books on the subject of Integrative Medicine from the USA and started to seek out a medical doctor in Australia who could treat me.

I was given urine and faeces tests which revealed I had an imbalance of gut bacteria and intestinal permeability. I was prescribed Naturopathic supplements and a clean diet of fresh food eliminating inflammatory foods and processed packaged foods. I also sought emotional counselling and started on a lifestyle of daily exercise. Non of the treatment was invasive or involved me taking pharmaceutical drugs so I avoided any side effects.

Now, in 2019, my last tests showed my intestinal permeability has improved greatly and I am free of the rheumatoid pain and stiffness. Once I could not walk without difficulty, dress myself, climb steps and now I am able to live a life free of pain. My local GP continues to be amazed by my improvement without the use of Methotrexate.

Friends and family notice improvement in my ability to function every time they see me. My integrative medicine doctor has saved me from a life of pain and dysfunction.

Regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, 12 May 2019 10:58 PM  
**To:** medboardconsultation  
**Subject:** Code of Conduct 2014

To whom it may concern

I would like to express my opposition to further changes or additions to the existing Code of Conduct 2014.

As a parent I place a critical value on the use of complementary health practices, in relation to the management of my children's health.

My daughter [REDACTED] has Autism Spectrum Disorder. As is the case for many parents in our position, we have explored a large number of different therapeutic paths. Ours included operational therapy, chiro, osteo, play based therapy and diet etc. As one would expect, each was successful to varying degrees.

We have never set out to either favour or disfavour complementary or "alternative health" treatments. What we have hoped for is to allow [REDACTED] to grow to her full potential and hopefully avoid the need for prescription medications ... Some of the treatments we have used have therefore also included homeopathy, kinesiology (to identify problem foods) and herbal medication.

One of [REDACTED] symptoms has been severe sensory issues. This has manifested in an inability to cope in many social and frequent, long and deep "meltdowns. The anxiety that results from these challenges has also led to prolonged behavioural issues including oppositional defiance, angeriness/violence and running away. These are common symptoms of ASD.

We can confidently attest to the success of herbal medications in bringing these issues firmly under control. Our level of confidence in the efficacy of this treatment is based on observation:

1. The initial response (and the scale of it) to the first dose.
2. Subsequent adjustments to dosage as the behavioural issues occasionally reappeared or flared up. These adjustments have been 100% successful in normalising her behaviour.

As parents, we can tell when she is responding to a treatment and when to discount the possibility of a false positive.

We have zero doubt that from a behavioural perspective, this treatment has been the game changer. [REDACTED] growth as a result has been phenomenal.

We have also closely monitored various health indicators for [REDACTED] with, and under the guidance of different practitioners. Our goal in this regard has been to understand the optimal diet for [REDACTED] and identify any factors that may be causing her physical discomfort. That monitoring identified an abnormal overgrowth in the "strep" gut bacteria. Herbal medication has also successfully brought this overgrowth under control, to the extent that its presence has normalised in her gut.

Thank you for taking the time to consider my submission and I urge you to allow us continued access to this treatment - our daughter's health and well being depends upon that access.

Yours sincerely  
[REDACTED]

**From:** [REDACTED]  
**To:** [medboardconsultation](#)  
**Subject:** Feedback re complementary medicine  
**Date:** Sunday, 28 April 2019 8:56:48 PM

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Hello,

I would like to voice my objection to changes to the Code of Conduct 2014. My family has been helped in so many ways with the advice of experienced health practitioners who use methods such as kinesiology, chiropractic techniques, osteopathy and herbal medications. I don't like to think of where our health would be without this valued advice and it would be a really disservice to our Australian community if other families were denied the increases in health we have seen as a direct result.

I have many examples but have chosen two for this submission but I have other examples if you would like more.

#### Result 1

7 years ago I was diagnosed with mucinous appendiceal neoplasms. At this time I had a 30cm ovarian tumour removed, plus a bowel resection and appendix removal. Chemotherapy was discussed (although not ultimately used) due to the high rate of recurrence of these tumours. My specialist told me there was nothing I could do except wait and see. It usually recurs within five years and I was told it would definitely recur in some form. It has been monitored frequently by my specialists over the last 7 years including regular colonoscopies, tumour marker tests and MRIs. In that time, I have seen many complementary practitioners such as kinesiologists, biomedical doctors, naturopaths, chiropractors. The tumours have not returned and the painful flareups that occurred in the first few years after diagnosis have completely subsided. The practitioners mainly worked on bacteria and inflammation. The specialist is very pleased and monitoring will reduce to an annual event. I am so grateful to have found people to help me achieve ultimate health and to be around to bring up my young family.

#### Result 2

My daughter had stomach pain and constant diarrhoea since a week after her birth. When she started on solid food the smallest piece of food would cause such acidity in her stools that a layer of skin would burn off her bottom and it was red raw and very painful. After 7 months of seeing doctors and specialists who helped us a lot with other parts of her health (such as reflux) we visited a naturopath. She recommended a probiotic which cleared up the loose stools in two weeks and [REDACTED] went on to be able to have a wide range of foods with no more acid stools. I even have the pictures. I wish I had been to see the naturopath earlier and feel dreadful that [REDACTED] was in such pain for so long when there was a solution available from an experienced practitioner who had seen this before. I can't imagine where she would be if we weren't able to sort this out and get her eating foods in a developmentally appropriate time.

I hope this shows how such advice is helping average families and hence the wider



community.

Thank you



24/6/2019



To the medical Board.

re: public consultation for unconventional  
medicine & emerging treatment.  
Option 2.

In December 2007 I was bitten on my face  
by a white tail spider. I attended [redacted]  
Hospital & many GPs, Dermatologists, microbiologist  
and Rheumatologist. I wasn't given a meaningful  
diagnosis, over the next 6 years. By this time I  
had many symptom of Lyme like disease.  
only <sup>given</sup> short term antibiotics, when I finished courses  
and  
^ When off antibiotics, I was continually suffering  
Pain & fatigue and recurrent infections <sup>(6)</sup> and a  
return of ulceration & infections in the effected  
areas of my body. This continued and I became  
to ill to leave my house.

I first saw Dr [redacted] in 2013. He started  
treating me after clinically diagnosing me with  
"Lyme like disease". I have been receiving  
antibiotic, (long term) therapy. I have had a  
marked improvement with majority of symptoms  
and hav'nt had a recurring infection <sup>gradually</sup>  
Symptoms  
decrease  
and improve

I cannot overstate the importance  
to my body & continued health improvement  
and quality of life, that Dr [redacted] is able to  
continue being able to give required long term  
antibiotic therapies.

He is the only Dr that has helped me long term.  
Thank you for your consideration.  
[redacted] [redacted] [redacted]

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**From:** [REDACTED]  
**Sent:** Thursday, 27 June 2019 7:50 AM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

To whom it may concern,

I am writing to offer my support for patient access to complementary and integrative medicine, keeping the status quo and rejecting a separate set of guidelines for your doctor. The right for individuals to have choice in medical care is important. After years of suffering, an integrative approach has been the only thing that has transformed my husband's mental health issues.

I choose 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.

Warm Regards,

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 5 April 2019 5:04 PM  
**To:** medboardconsultation  
**Subject:** CENSORSHIP OF INTEGRATIVE MEDICINE

## 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 menopausal systems eg cystitis, hot flushes, no energy, vaginal dryness that was very painful and affected my relationship with my partner. Feeling depressed and hopeless. It was affecting my whole body. ( Since taking my natural hormones all these symptoms have gone).

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 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 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.

Very concerned.

[REDACTED]

5/4/19

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**From:** [REDACTED]  
**Sent:** Friday, 3 May 2019 8:07 AM  
**To:** medboardconsultation  
**Cc:** [REDACTED]  
**Subject:** opposition to changes to the existing Code Of Conduct 2014

Dear Sir/ Madam

I am writing to you re a very urgent and serious matter, which concerns my right to choose the practitioner and treatment of my choice, and my right to have the highest attainable standard of care as per the World Health Constitution of 1946

i In February 2018 the MBA put out some new proposed guidelines for doctors practising complementary practices, which aims to redefine what safe medical practise is in Australia .These proposed new guidelines ( which were published WITHOUT consultation from any intergrative or complementary medical practioners or acedemics in the field of intergrative medicine ), propose to have the potential to seriously restrict and suppress the use of intergrative and complementary medicine in australia .

The new proposed guidelines imply that there are dangers in all complementary medical practise .I find this implication grossly unnecessary and untrue .There is no proof that there is any risk , and thus changes to the current guidelines are unnecessary, as the current guidelines are sufficient .

What is the rationale , for these new proposed guidelines ?

Why they been developed without involving any intergrative practioners ?

Intergrative medicine is safe ,natural and wholistic. It is a healing orientated medicine . It considers every aspect of the persons lifestyle and it is backed by scientific evidence . There is no proof that there is any risk , and indeed the risk of complementary therapies is low , as the aim is to use less pharmaceuticals..Adverse effects from pharmaceuticals , often cause admission to hospital and death ( p8)-McKinsey and company. Strength in unity: The promise of global standards in healthcare October 2012);

There are over 70 universities in the USA that are involved in the consortium of intergrative health .These universities are embracing intergrative teachings , where as here in Australia , it seems that there are efforts to suppress complementary therapies . For example, people who choose to go to a complementary therapist , can no longer recieve a rebate from thier private health fund , and now the proposed changes to the guidelines for alternative practioners.

Intergrative medicine is being increasingly incorporated in medicine .Up to 30 percent of doctors use some form of complementary therapies.Surveys of the last decade show this to be the case.If complementary therapies / doctors / practioners are not around then the public's ONLY option , will be conventional and approved doctors and conventional medicine.Therefore the MBA s s claim," that it will not limit a patients right to choose their healthcare violates this right .Taking away people s choice is a violation of people's rights ( articles 18 and 19 of the international covenant on economic and social rights and cov on civil and political rights - ratified by australia in 1995 ) i wish to exercise my right under the australian charter of healthcare 2007/8 to be included in decisions about my healthcare , and choose the practioner and treatment of my choice .

I am an educated and informed member of the public . I am a Registered Nurse of many years of experience . i am opposed to further changes or additions to the existing code of conduct of 2014, and to the current guidelines i do not want my healthcare choices , nor those of others, limited to having conventional medicine choices only .I consider this proposal to be an absolute step backwards in medicine , and I am appalled it's even being considered.

As a nurse( general/ occupational health and mental health trained ) I have seen many people improve with complementary and nutritional medicine , where conventional medicine has failed them. I have clearly seen and heard from my clients how a complementary and holistic approach has benefited them .Cancer patients who have not improved with conventional medicine, improve and are often cured with complementary therapies .

I work within the field of indigenous health , which I feel passionate about .. Many indigenous people suffer from early onset chronic disease. Intergrative medicine has the potential to prevent chronic disease close the gap and improve the health outcomes for aboriginal people

My sister ,and also a very good friend of mine.. both of whom would most likely be bed bound without the support of intergrative doctors nutritional // complementary medicine and practises.. Both have had thier lives turned around.by complementary medicine.This is two people close to me in my life .. How many others are out there , and have had a similar experience. with thier loved ones ?

My GP is an intergrative Doctor. There is such a demand for intergrative Doctors that I i waited 2 years on her waiting list ,, to become one of her patients.. I was seeking a more holistic approach to my medical care , which conventional medicine does not allow for. The wait , to become one of her patients was well worth it . I am extremely satisfied with myGPs care and I find her highly professional and principled , with diagnostic skills second to none .At no time does my GP substitute essential conventional treatment or investigations, where and when they are necessary

. The benefits of having an intergrative Doctor , and consulting with her about my health needs has been such a bonus to my health and has helped me time and time again regain the road of wellness.I also have had regular consults with a registered naturopath , who has also helped me back on to the path of wellness. Before my treatment I was on the way to having a chronic illness .The study by Prof Stephen Myers proves the benefits of naturopathy ( Feb 2019 - Southern Cross University ) and validates my own personal experience , of intergrative/ complementary medicine .

Without having the freedom to choose practioners who use intergrative / complementary therapies, I feel quite sure that I wouldn't have the excellent health that I have today , which allows me to live, work and function as an active member of the community .

Yours

[Redacted Signature]

I have cc d my local MP into this letter cc my local mayor cc the Secretary of the Dept of Health

To the Medical Board of Australia,

I am writing to provide you with feedback as to why I suggest Option 1 would be the best outcome for your proposal. Based on my own personal experience, I strongly support that the current status quo regarding general practitioners practicing alternative medicine be retained. For the purpose of this submission, I will be alternating with the terms 'alternative' and 'integrative' medicine.

I do not agree with the nature and extent of the issues identified in relation to medical practitioners who provide 'complementary and unconventional medicine and emerging treatments'. In fact, the treatments offered by alternative medical practitioners are sometimes the only option people have for managing their illnesses. This is not to say that alternative medicine should override conventional medicine or that it is somewhat superior, rather that conventional and alternative medicine can and should go hand in hand. Additionally, people should be given the choice as to how they want to be medically treated.

In 2010, I was diagnosed with rheumatoid arthritis at the age of 21 which was well managed with conventional medicine until I was 28. After having my second child, my arthritis had flared quite badly and my medication was no longer effective. I was in a tough situation as my Rheumatologist had informed me that no other medicines were safe to take during breastfeeding or during any future pregnancies. This left me with no other option than to see if an integrative general practitioner would be able to help me. By undergoing alternative treatments such as diet change, herbal medicines and supplements, my symptoms have greatly improved within the last 4 months and I have now been able to return to work and perform everyday activities with ease. It should be noted though, that I am also still taking my previous medication prescribed to me by my Rheumatologist. As I stated earlier, this is a great example of how both conventional and alternative treatments can complement each other.

Furthermore, I was impressed by the amount of time my integrative general practitioner was able to spend with me during my appointments. I was never satisfied with my rushed 10-minute appointments with my Rheumatologist. In fact, I felt quite exploited due to the amount of money I was spending for a 10-minute appointment with my specialist. Yes, my alternative general practitioner charged more, but my appointments were much longer hence much more value for money.

There are many more people who have had positive experiences with alternative medicine and also many people I know who have had negative experiences with conventional medicine. We need to be given the freedom of choice as to how we want to address any health issues we may have. What works for one person will not work for all.

Hence, I do not support any proposed restrictions on alternative medicine or emerging treatments. The public consultation paper does not take into account all the positive experiences people have had with integrative general practitioners. It also doesn't take into account all the negative experiences people have had with conventional general practitioners. I suggest to take these people into account because although it is unfortunate some people have been reported to have negative experiences with alternative treatments, they may very well be a minority.

I ask that you take my submission into consideration as I believe Option 1 will be the best course of action. Option 2 would only strip people of their rights to access all that alternative medicine has to offer.

Yours sincerely,



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**From:** [REDACTED]  
**Sent:** Sunday, 30 June 2019 1:39 PM  
**To:** medboardconsultation  
**Cc:** [REDACTED]  
**Subject:** Public consultation on complementary & unconventional medicine & emerging treatments

Begin forwarded message:

**From:** [REDACTED]  
**Date:** 27 June 2019 at 1:37:48 am AEST  
**To:** [REDACTED]  
**Subject:** Med board

I have found most GPs to be quite efficient at solving simple straightforward health problems. However, when asked to interpret a large number of malaise symptoms they appear non-plussed. This is possibly because it's too complicated to solve in a standard 20 minutes consultation. One GP told me she'd prefer to deal with clearly defined illnesses which had established treatments. I thanked her for her straightforwardness and assured her that given that I was unwell that was the sort of illness I'd prefer to have. She recommended a doctor who treated complex health problems.

The recommended doctor questioned me about symptoms for over an hour then ordered tests. In subsequent consultations he prescribed both pharmaceuticals and vitamins. My symptoms improved greatly. Since then we review my treatment as symptoms change from time to time. This has resulted in better quality of life for me. Over the years I have seen several doctors who "specialise" in integrative medicine. They are more knowledgeable than most GPs about conditions like CFS and fibromyalgia and able to distinguish them from Addison's disease.

Given that many people will choose to take vitamins anyway it would be better for them to get advice from someone with relevant training like an integrative medicine doctor.

Integrative and Preventative Medicine should be made a specialist training. It clearly requires more study and an aptitude for complex problem solving. Also, more time is required for this task and the higher rebates of specialists would ease the financial burden of those who have complex or chronic health problems. It would also help those who want to use preventative medicine to optimise their health and maintain their independence for longer.

Certainly, it is unfair to make some doctors to do more administrative work and then pass the cost of this onto their patients. Either all doctors should have to do these onerous requirements or none. Does it really benefit the health system to increase the amount of administrative activity?

It beggars belief that the Medical Board of Australia would choose to prevent the use of emerging medicine. Does this mean that if a cure for cancer or multiple sclerosis were discovered tomorrow you would prevent it's use?

Medical and scientific research is largely funded by the taxpayers, either directly or indirectly, and therefore they are entitled to benefit from it.



Furthermore, the training doctors receive qualifies them to assess which advances in the peer reviewed scientific literature that are appropriate to utilise.

Quite separately, it is an abuse of human rights to deprive people of any available treatment which will help their health.

From my own experience, one of the tests requested by an integrative doctor for me was positive for

pyroluria. This condition is managed with several vitamin supplements and made a significant improvement in my health. If knowledge of the pyroluria had emerged earlier I would have been able to work for a few years longer.

Another example is a physicist I know who also sees an integrative doctor was tested for positive for MTHFR and now takes a vitamin supplement which has cured her CFS.

Another woman, who had been diagnosed with CFS for 17 years, was tested positive for Borrelia and cured of CFS with a course of antibiotics. The medical profession in this country appears to have a blind spot regarding Lyme Disease. Surprisingly since it's worldwide and people travel frequently.

Preventing integrative medicine doctors from treating this type of health problems is likely to result in more people on the disability pension and needing more support services.

Choosing not to treat tickbourne disease is cruel and costly to this country in terms of human suffering and the potentially enormous financial burden to this country for the following reasons.

Ticks carry more bacteria than any other arthropod vector because their immune system is weaker. Borrelia is worldwide (including in migratory birds in Antarctica) and it has been with us for thousands of years. Deer, rats and mice can carry Borrelia and are hosts to ticks.

The first deer were brought to this country from Britain in 1803. There followed many other importations, of which, 6 species remain from Europe, Asia and America. These, mostly feral, deer are widespread across most of Australia and every time there's a bushfire they scatter further.

Rats and mice came to this country with the First Fleet and subsequent shipping. Rats brought the plague to this country which, fortunately, was eliminated successfully.

It is extremely unlikely that we avoided importing Borrelia and it's co-infections by the route just described. But even if, by some miracle, we had it wouldn't matter because a new species of Borrelia has been found in Australian native animals.

In addition to this, it is now thought that Borrelia could be transmitted between people. And people are travelling internationally more than ever.

Borrelia is immunosuppressive and frequently responds poorly to treatment. It can produce painful and debilitating symptoms. It robs people of life's opportunities and often makes them a burden on social services.

Borrelia has been linked to the development of Alzheimer's disease. These reasons should convince you that it is worth treating tickbourne illnesses if only for financial reasons.

The presence of deer in this country is potentially a problem for an additional reason. Chronic Wasting Disease (CWD) in deer is thought to be caused by prions and has appeared separately in America, Norway, Finland and Sweden. Some research suggested the actual cause could be bacterial. This is a further concern which should not be ignored because there is evidence CWD can be transmitted to monkeys and mice and therefore possibly to humans.

References for the above information can be supplied if required.



To: the Australian Health Practitioner Regulation Agency

To whom it may concern,

I am writing to voice my opposition to further changes or additions to the existing Code of Conduct 2014. The health practitioners – Integrative GPs, Homeopathic GPs, Naturopaths, Nutritionists, Chiropractors/Osteopaths I have seen for my health issues have been so vital to my well being over the last 30 plus years.

Starting with a GP trained in homeopathy who looked after my general health from my teens till after I had my two children – offering practical advice as well as administering general care, immunising my children but doing it safely with homeopathic drops to accompany the vaccination to prevent complications. Splitting up the dosages so as not to overload the body and checking them over to make sure they were healthy before administering the vaccine.

More recently, in the last 12 years I have had thyroid problems. I visited a GP 12 years ago with allergy symptoms – they ran some tests and it turned out I had Graves Disease (overactive thyroid). I was sent for scans and to an Endocrinologist. That endocrinologist told me I would have to take medication that would have side effects, that eventually I would either have to have my thyroid removed or take a nuclear capsule to destroy the thyroid, and that I would be on medication for the rest of my life. Oh, and I would also go psychotic! I left there absolutely freaked out and anxious and depressed. I cried for a week.

Fortunately, I was able to find an Integrative GP who had a lot of experience with thyroid issues. She assured me that even though my levels were high, they were not as high as other patients she had treated successfully. Through a diet change (removal of gluten and dairy and adding foods which help to lower the thyroid level such as fermented soy, almonds, uncooked broccoli and cauliflower) and herbs to calm the overactive thyroid, plus supplements and vitamins to support my thyroid, and overall changes to heal my leaky gut, I was back to normal thyroid levels in 9 months! All of this without pharmaceutical drugs!!

Many years later, due to huge stress levels in my personal life, an 8 week course of antibiotics for a nasty tick bite and (as my previous practitioner had moved away and the local GPs available were not willing to check my antibodies, Free T3 and T4 etc, for adequate thyroid care) I was again diagnosed with thyroid issues – this time with Hashimotos Thyroiditis, through blood tests a nutritionist had asked a GP to run. On being able to contact my previous integrative practitioner, she was again able to reverse my high level of antibodies through supplementation and diet changes (this time for an underactive thyroid). I was back within normal levels within 30 days! Again without pharmaceuticals!!

Due to more stress – getting remarried, buying a house, getting used to a blended family etc, I developed fatigue due to low DHEA. A new integrative practitioner did the right blood tests and gut screening tests to know where my body was at. She helped me again with herbs to balance the bad bacteria in my gut, advised me about exercise and diet and stress management/counselling to deal with my anxiety and stress load. Supplementation of herbs for my adrenals and thyroid (which are affected equally in these circumstances) and vitamins for support of my endocrine system helped to raise my very low levels of DHEA and kept my thyroid at a normal level.

All of these practitioners have taught me about nutrition and lifestyle choices which I have been able to pass on and use in feeding my family and friends. They have all reaped the benefits of better health and lifestyle choices accordingly. I am now able to manage my own health with occasional check ups to monitor my progress. I believe it is very important to be responsible for our own health.

Over the years I have seen many GPs who have never asked me what was going on in my life, about my stress or previous illnesses. They have never asked about my diet or tried to find out what had caused the illness in the first place. Their only “go to” was to treat with antibiotics or prescription drugs to treat the symptoms, all of which are not cures for illnesses, just masks for underlying issues.

In this country we have the right to choose our government; the choice to abort our unborn children; to marry someone of the same gender. We live in a democracy not a communist country, therefore, we should have the right to choose who administers health care to us and how they do that. We should also have the right to have the highest attainable standard of health as a fundamental right. This right is recognised by the World Health Organisation Constitution (1946), not to mention the Australian Charter of Healthcare (2007-8) which allows us the right to be included in decisions about our healthcare.

These naturally trained practitioners – some medical doctors with extra training, some naturopaths (who have a much higher level of knowledge in treating acute illnesses than most GPs I’ve been to), chiropractors, osteopaths, herbalists – all have a place in the health industry. In my opinion they are the “highest standard of health care”. GPs are very helpful when it comes to pap smears and vaccinations (although more care should be given when vaccinating children) and ordering tests and referring to specialists. Doctors in hospitals are amazing and well trained in saving lives and surgical procedures. They all have a place.

If only medical doctors had the extra training in nutrition and diet, natural means of healing over antibiotics (which destroy the good gut bacteria and cause issues such as autoimmune conditions), if only they looked at the whole of a person and their lifestyle and helped people to make good life choices. Of course, there are some wonderfully trained GPs who do extra study into these things but they are few and far between.

These natural practitioners DO have that training. They know all about nutrition and how it heals the body. They know about herbal and vitamin supplements and how they can benefit and heal the body. They know about exercise protocols and good breathing habits which affect the body. They know what tests to order to find underlying issues and how to address those. They look deeply into conditions that GPs refer patients to specialists for. They are highly educated in their field with many years of study (and ongoing study to keep up to date with new research and products). They know about toxins in the environment which lead to disease. They give practical and helpful information to their clients/patients, and, we as their patients/clients see first hand those benefits and the healing in our bodies.

We need more of these doctors and practitioners as they are so hard to find and I know I would rather go to a natural practitioner that looks for the reason behind my ailment. These practitioners have changed my life and my health. Please do the right thing and keep allowing them to help us. We would all be a lot sicker and unhealthy without them.

I believe that GPs and natural practitioners should work together, each with their own specialties and knowledge, to compliment each other instead of being suspicious and ignorant of each other. This would be of great benefit to us as their patients.

## CONSULTATION ON COMPLEMENTARY AND UNCONVENTIONAL MEDICINE AND EMERGING TREATMENTS

SUBMISSION 12 June 2019

I have had problems with my health for a very long time, with nothing addressed until I found Dr [REDACTED]. Concerned with my symptoms from the 1980s on, I consulted with many doctors – GPs and specialists (such as gastroenterologists and endocrinologists). I received no help for my problems. The diagnosis which I eventually received in the mid 1990s was irritable bowel syndrome and fibromyalgia – a manifestly insufficient diagnosis. On my first consultation with a GP in 1988 about my aching all over, he said “You have a low pain threshold.” My symptoms of pain and debilitation continued. The personal cost due to lack of diagnosis and appropriate treatment for my condition was considerable, both financially and psychologically.

The first help I ever received for my condition – approximately 30 years after the onset of symptoms – was from Integrative GP, Dr [REDACTED]. When I said, on my first consultation, “The bloating is getting me down”, she said to me, “This is your lucky day. I can help you. I have done extra study.” Dr [REDACTED] is a member of the Australasian College of Nutritional and Environmental Medicine. At last I gained an adequate diagnosis. I had been struggling with a blastocystis hominis infection for a very long time. Antibiotics got rid of the infection, and the nutritional supplements have ameliorated the long term effects. The results of these treatments are phenomenal. Before the treatment, I was really ill, with no energy. After several years of treatment, I feel a great deal better, and I have been able to do some things I have always wanted to do – I have published two books, and I am continuing to write. This is a great contrast with all those years when I was going downhill steadily, with worsening health. Dr [REDACTED] has also helped with some other underlying health problems – eg. a problem with methylation. The treatment is long term and I am continuing to gradually feel better. Dr [REDACTED] has recently referred me to a nutritionist who is also helping me to reduce the long term effects of my illness.

I advise the Medical Board to stay with the first option concerning complementary and unconventional medicine and emerging treatments – i.e. maintain the status quo. From Dr [REDACTED] I have received only help and guidance, for which I am very grateful. I have neither been exploited nor detected any conflict of interest. She explains everything to me very well. She has good knowledge and skills; indeed, a medical student is occasionally present during the consultation. I am very pleased and relieved to see that doctors are now being taught about blastocystosis and other similar health issues. I do not have any problems with patient assessment, informed consent or with treatment and advertising.

Yours faithfully,

[REDACTED]

My name is [REDACTED] and I have been fortunate enough to have been given my life back after being treated for a long term illness by Dr [REDACTED] from [REDACTED]. This is my journey to recovery after an illness that the medical profession could not identify or treat successfully.

When I was 18, I was rushed to hospital with suspected appendicitis after experiencing severe pain on the right side of my stomach. After many tests, it was concluded that it was not appendicitis and when they had the pain under control, I was advised to go to my GP for further investigation. A couple of months later the pain was back, but more intense. Each time I went back to the GP, who would give me pain-killers and then sent on my way. The pains would subside when taking the meds, but it was no answer as to why it kept happening. I would finish the treatment that was prescribed, and within weeks would be back at either my GP or hospital. The GP was concerned as it was becoming more intense and different symptoms were presenting. I had started to shake vigorously and vomit with the pain, and one side of my body was red to look at and hot to touch, so she started to send me for different tests to eliminate different things. She had told me that if it got too unbearable that I should go straight to the hospital ED.

The next year or so, saw me get sent to a range of doctors as she was now baffled as to what was happening. She seemed to think that I had an infection internally and would give me antibiotics for a week, which would fix it for a week or two, but then it came back with vengeance. This continued on and off for the next five years. One episode that took me straight to the hospital saw me admitted when the doctors witnesses a severe rigor attack. I couldn't control the vomiting, as the pains were so intense. I was put on a drip and given intervenes medication and several tests were run over a period of days. They got the pain under control and said that I had a major infection internally but could not work out what. After a few days, I was sent home with more antibiotics and pain-killers. Once again, when everything wore off – a few weeks later the pains and more symptoms presented. By now I was shaking constantly in pain and when the pain became so intense I would spend ages vomiting. I had become sensitive to light and sound, the right side only of my body would swell and glow red on my ear, hand, knee and foot. I had rashes appear and my skin had turned horrible. I had started to slur words and on some days had to lay completely still under a blanket with no noise. My body was burning and my head felt like it was in a vice (that is the only way that I could explain the pain that had developed in my head).

By now, I had been sent to many doctors and tested for many things; gynecology, cardiology, immunology, infectious disease, urology as different and more symptoms presented. There was never any explanation or result that would lead to a solution and I would constantly be told that the bloods were not quite right and I would be prescribed another one-week course of antibiotics and given strong pain-killers. All this treatment did was give me short term relief whilst taking it, but as soon as I'd finish the treatment, it was only a matter of time that the pain would be back and more intense and often new symptoms would present.

After seeing a news report on the news regarding a Lyme-like disease from a tick bite – it reminded me that I had a tick in my stomach for over 24 hours all those years ago. I went back to my GP and asked if it was possible that I may have that. I explained that all those years ago when I was 18, I had a tick in my stomach for over 24 hours and that another local doctor removed it. It was quickly dismissed, and I was told that we do not have that disease here and it was media sensationalism. I asked that just as a process of elimination, if I could I be tested – simply to rule it out. I was told that they do not do the test here.

The next year saw me take a spiral turn downwards. Once a very driven, independent career orientated young lady, just about to make it into the media career of my dreams I was now lucky to get through a day without pain or vomiting. My GP offered to give me different medications that would normally be used for depression after suggesting it was all in my head. This was my lowest point as I had physical evidence that could be seen and felt by many doctors with their own eyes. I had endured many tests and passed from profession to profession to no avail.

After watching me endure the pain and fight for a solution for so long, my family were deeply concerned as I was no longer able to function properly. They were desperate to help me after a major episode saw me unable to get out of bed. I was curled up in the fetal position, shaking terribly in pain and saying I did not know how much more of this I could take.

My mum went to my GP in tears and pleaded for help – to be told she did not know what to do for me. My mother discussed the fact that I had a tick in my stomach for over 24 hours when I was 18 and asked was it at all possible that I have an infection possibly similar to Lyme, as so many of my symptoms were similar and all the treatments and tests to date had failed to identify let alone cure what was wrong with me. She was told that they won't even tests for it here.

Long story short:

In desperation and much research, we discovered Dr. [REDACTED]. He had a waiting list of 3 months or more, but my family were desperate and they pleaded for him to see me sooner. He agreed and I was sent for tests before seeing him 3 weeks later. After tests were sent all over the world, it was concluded that that many of my symptoms were in fact similar to Lyme and that there was no instant fix. Dr. [REDACTED] explained very clearly to me, that it would take 3-4 years to get all the different bacteria's that had manifested in my body out. I was going to get worse before I got better, but he felt confident that he could fix me. He was going to treat me with a combination of conventional and natural medicines. At this point I had a decision to make as to whether I was going to continue on the path I had been on for the past 8 years and had become chronically worse and now being offered mental health medication and literally told that I had to live with it.....or trust this



new doctor who was confident he could give me back at least some quality of life as long as I could see the treatment through. I had already lost most of my 20's and the career of my choice. I couldn't see how things were going to change by staying on the path I had been on for so long, so for me there was only one choice.

Dr. [REDACTED] explained that it could take as long as 3-4 years to be free of my symptoms. After six months of feeling worse at the beginning of treatment, I finally started to feel better. My treatment was changed along the way and Dr. [REDACTED] kept a close eye on me giving me more and more confidence that there would be happy days ahead. True to his word it took another 3 years of treatment before I was off all the medication and I was feeling great. After being medication and symptom free for over a year – I had an episode that yet again took me to hospital. I woke one morning to half my face paralyzed in patches. I was admitted to hospital with suspected Bells' Palsy. I remained in hospital for a week or so as the medical profession were concerned, as my paralysis did not present as true Bells'. I was paralyzed in a zig-zag down my face and neck rather than down one side. Once again, it baffled the medical profession until an intern had said he had seen this once before....on a patient that had a disease similar to Lyme disease. As soon as I heard this, I explained that Dr. [REDACTED] had treated me previously for Lyme-like symptoms with great success. I was released after a week or so and Dr. [REDACTED] once again put me at ease and was able to get me feeling and looking good after a few short weeks of treatment.

When I look back at my journey to date, I am not sure I would be here right now if Dr. [REDACTED] had not agreed to see me then treat me. I will be forever grateful to this man as he has not only given me back my life, I now have an understanding that it is so important for our bodies to be in optimum shapes to be able to allow conventional medicines and treatments to work. For me the long-term combination of conventional and natural medicines was the solution to peeling back the layers of an illness that was crippling me.

I am now medication and symptom free, and have a very successful corporate career. It would be a great injustice if the medical board stripped the rights of people to have access to doctors such Dr. [REDACTED] and the options he and his colleagues can provide.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, 2 April 2019 8:31 AM  
**To:** medboardconsultation  
**Subject:** Banning Integrative Health

Since becoming severely ill it has been made clear to me that Australia is run by pharmaceutical companies and anybody who has their hands in there pockets.

Who is going to stand up for sick Australians? People that struggle everyday too just make ends meet and keep themselves off the streets, I'm really hoping that hero we need will be the Australian Medical Board. I want to believe that someone on the larger scale cares about us and we're not completely alone.

Because I'll tell you the only people that have cared about me enough to help me is Integrative Health professionals.

I honestly don't know how to put into words where I would be without them, because I honestly don't know.

If I'm honest it would end with me on the streets and that would literally kill me.

I have severe Chronic Fatigue Syndrome at the age of 29.

My maximum amount of hours I can work per week is 15hrs, I can no longer take part in the gym like I did religiously prior to getting sick.

Non integrative health professionals have done nothing more then offer me sleeping tablets.

When I raised the fact I would then not be able to function due to the adding toxicity and exacerbating my brain fog, I was then offered 'the drugs they give students to stay awake'.....

This would make me severely unwell, I wouldn't be able to work at all and would then be a burden on the welfare system and not be to pay for my treatment.

I'd end up bed ridden at 29.

How is it fair that that would be my quality of life because someone else doesn't understand or doesn't want to accept the benefits of integrative health.

I really can't express how much trouble I would be in without integrative health.

'Unconventional medicine' (although it seems a lot more logical then conventional options) is the only option I have in order to get better and have a normal life in which I can work, eat, wash, just do the normal things others take for granted.

'Conventional medicine' and Pharmaceuticals are not the answer for everyone.

Unconventional health care professionals are the only ones who did the required tests to find out the core of my condition and the treatment I need.

I was nothing but 'fobbed off" my conventional medical health professionals. Imagine how that would feel when al of a sudden you're so sick you can't get out of bed.

We knew nothing about Cancer until research was done and the findings of the research was accepted.



Why is this not the same? Research has been done all over the world to confirm 'Unconventional medicine' is all that is available to help someone like me.

I just ask that people of the board think, how would you feel if this was you or child? and the only treatment that was helping was in threat of being taken away.

Without Medicare I would not be able to afford my treatment and it would be horrible.

I would like to suggest the Medical Board consider and decide on option 2 of these changes - Option being -

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 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.

I hope the above makes sense, I have a lot of issues with cognitive tasks and brain function due to my condition.

Please don't hesitate to contact me if required,  
I can be reached on this email.

[REDACTED]

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**From:****Sent:****To:**[REDACTED]  
Tuesday, 2 April 2019 9:05 AM

medboardconsultation

I am writing to you with concerns. My daughter has struggled continuously for a lengthy period. After seeing several Drs with no diagnosis. We were at our wits end. Each dr says they had no idea why she was struggling and there was nothing wrong. Watching what my daughter has gone through is heartbreaking. Late last year, we finally got a diagnosis, she has severe chronic fatigue. This is a constant struggle with the resources available. Finally she has been able to access some help with extreme costs to herself. From working full time and being a very active person. She now can no longer live the lifestyle she was a custom to. She now even struggles to work 5 hours a day 5 days a week. Regularly only manages 3 days at the most. She has had to get her income protection approved to get her by. She is trying to get some of her superannuation to help pay for the dr and treatment she so desperately needs to help get better. She had tried everything they have asked of her even changing her already health diet. I am heartbroken watching her daily struggles just to get through each day. Please help my daughter and others like her

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**From:** [REDACTED]  
**Sent:** Monday, 8 April 2019 5:28 PM  
**To:** medboardconsultation  
**Subject:** 'Public consultation on complementary and unconventional medicine and emerging treatments'

To whom it may concern

**I support Option 1 to retain the status quo.**

My name is [REDACTED]  
I have the following diagnoses:  
major depression and anxiety  
fibromyalgia  
ME/CFS  
Postural Orthostatic Tachycardic Syndrome

I have benefited from conventional medicine but was still left very unwell. My consultation with 2 other doctors who practice unconventional medicine and integrated medicine have helped me enormously.

I have been prescribed the drug Lamogtrigine off label for many of the symptoms of Fibromyalgia Syndrome and ME/CFS. It has helped regulate energy levels and mood, reduced pain and improved sleep.  
The Integrated Dr I've seen for the last 3 years or so has prescribed supplements and herbs which have reduced the severity of symptoms and improved my quality of life.

Both these doctors have long consultations so they can consider the complex nature of the chronic conditions. I have not been able to find this holistic approach in conventional medicine.

In addition I support the AIMA letter to the MBA and the 5 concerns they have listed:

- 1 The proposed guidelines are unnecessary.
- 2 The guidelines do not conform to COAG principles for best practice regulation.
- 3 The scope of the proposed guidelines is poorly defined creating ambiguity and uncertainty.
- 4 The amalgamation of three disparate groups into one definition is not scientific.
- 5 There has been a lack of procedural fairness in the development of the proposed guidelines.

Thank you for your consideration

Regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 22 February 2019 7:14 PM  
**To:** medboardconsultation  
**Subject:** Integrative Medicine

To whom it may concern:

I am in the US but planning a lengthy visit with friends in Sidney. I heard that the country is considering a ban on Integrative Medicine. I am very disturbed and worried at the prospect of not finding a doctor (if I need one) who can prescribe LDN and supplements for my Ulcerative Colitis. For the last 30+ years since I was first diagnosed, I have not gotten any relief from the standard meds and suffered horrible side effects.

Finally, I sought help from an Integrative Practitioner and I feel so much better. For the past year I have followed an anti-inflammatory diet with supplements and LDN. It has made a huge difference in my life. I have the freedom to travel and experience a social life without worrying about an urgent need to relieve myself, as I did previously. Please consider that millions of people around the world are being treated without harmful drugs and saw improved health as a result. Sometimes, the gentle treatment is the most effective means to heal a myriad of diseases .

Thank you,  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 13 March 2019 7:44 AM  
**To:** medboardconsultation  
**Subject:** Integrative GPs and their current functions

To whom it may concern,

A friend of mine has spent years being sick and is finally getting the help she needs and is feeling a lot better through seeing an integrative GP. I'm not sure why the functions of integrative GPs is being looked at, I can only put it down to big pharma companies pulling their weight and gaining an even bigger foothold in the market.

I personally have had a lot of success throughout my whole life with holistic health, in conjunction with conventional medicine. It saddens me and makes me angry and quite fearful of the future with so many changes coming in to stop a lot of these practices which cause nobody any harm and help so many people, including my friend and myself.

Please leave integrative GPs and their current functions alone. So many lives will be effected by this change including my friend who won't be able to get the medicine she needs, the medicine which has been having great results for her. There is no sound reason to bring in these changes.

Kind Regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, 5 March 2019 9:41 PM  
**To:** [REDACTED]; 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:

- 'Hereditary' High LDL Cholesterol - was told this was hereditary and statins was my only option - WRONG - I just needed to change my diet
- Graves Disease - After being prescribed statins I returned complaining of what I thought was liver cramping, I was unable to pick up my baby, wash my feet, fasten my shoes and to get used to it because I would be on medication for the rest of my life - WRONG, now via an integrated GP I am in remission and a few supplements keep my thyroid happy & healthy.
- Misdiagnosed Streptococcus -  
=VISIT 1 - sores in throat, told to gargle with salt waters - WRONG it was strep throat.  
= VISIT 2 - All over rash, told it was post viral rash - WRONG it was streptococcus  
= VISIT 3 - Woke 2am turning in bed, couldn't move my hips for several hours and ended up with 5 cracked teeth - finally sent for blood tests & heart scan. Was told I had post strep arthritis and given steroids  
= VISIT 4 - Depressed, Upset, Couldn't speak/function - was told to stop taking the steroids immediately!! DID NOT RETURN TO THIS DR AND WILL NEVER SEE ANOTHER CONVENTIONAL DR AS LONG AS I LIVE.

Listening to patients is paramount and conventional GP's sadly do not listen/care!!

Currently I feel alive... Happy/Healthy and absolutely no health issues at all ALL THANKS TO MY INTEGRATED GP. Please do not take my life line away, I am an older mum to two young children and I want to be around for as long as I possibly can, I can not do this without an integrated GP - in my opinion this is how all GP's should work, not just a robot who doesn't listen and just seems to dismiss me or prescribe medication I don't need.

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 always delivered unwanted side-effects 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:

Concerned,

Name: [REDACTED]

Signature: [REDACTED]

Date: 5/3/19

Occupation: RMT

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**From:** [REDACTED]  
**Sent:** Sunday, 30 June 2019 7:32 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

I choose Option 1...that no new regulations are required for doctors practising in the areas of Complementary Medicine and Integrative Medicine.

I believe the current guidelines appropriately protect patients and their safety, and that 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. I am most concerned that any change will compromise my ability to access the healthcare of my choice.

I personally wouldn't know where I would be today without Integrative Medicine. Conventional medicine failed me in many areas, as I found some doctors to be too tunnel-visioned and happy with the bandaid approach, without getting to the root cause of my problems and providing me with answers. My health was literally going down the toilet before I first heard of Integrative Medicine. To find a fully qualified doctor whose skills and additional medical training included Integrative Medicine, and to discover a wider range of diagnostic and treatment options, was a godsend for me, and has not only transformed my health and wellbeing, but has then had a very positive impact on my family dynamics. For me, having the option to be able to choose both Complementary and Integrative medicine methods, hand in hand with Conventional methods for simple treatments within brief consultations, is so vital. I want to be able to go further with prevention and a deeper understanding of what I can do for myself, to be and feel the healthiest me I can be. Not all of us respond in the same way to the same medicines, methods and treatments. I have nearly died from taking a couple of medications that I was prescribed from a specialist my conventional GP referred me to. I believe I have the right to co-design my treatment, to be able to find what works for me as an individual.

I find it most concerning that there seems to have been no consumer/patient input into your draft guidelines/regulations. This lack of patient input seems to totally disregard the idea of patient choice. The question of how effective Complementary Medicine and Integrative Medicine is should be a decision entirely left to me. I know what works and what makes me feel better and what doesn't. Noone else can tell me any different.

I find it very disturbing that the Medical Board of Australia includes members of the Friends of Science in Medicine, who are a political lobby group that oppose Complementary Medicine and Integrative Medicine. This is a clear conflict of interest. The Medical Board of



Australia should immediately 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 absolutely no transparency in consultation process. The Medical Board of Australia has acted in a cloak of secrecy and a failure to disclose the details of why the new regulations. This to me is very unsafe!

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**From:** [REDACTED]  
**Sent:** Wednesday, 13 March 2019 8:23 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments'

We totally support medicos who are holistic and use integrative medicine!!! My husband had been seriously ill with anxiety and depression as a veteran, hospitalised a number of times over the last three years. The psychiatrists didn't really help, it was a holistic doctor using complementary medicines that got him well and found physical issues that no other doctor had considered or looked at. The same doctor helped my doctor with an issue she had, and fortunately found her iodine levels were completely skewed. Discovered just before she fell pregnant thus avoiding serious issues with the baby. I also know of an endocrinologist who referred a patient to this same doctor because he had given up on trying to get levels right for the past two years. She had corrected their levels within 3 months using complementary medicines. The "usual" doctor should not be so narrow minded to think only scripted drugs are useful. I am appalled that doctors like this could possibly be restricted!

[REDACTED]

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

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

Two years ago our granddaughter, [REDACTED], was a healthy, happy young woman, with no history of health problems. She was employed by 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.

[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 granddaughter [REDACTED] was misdiagnosed time after time as her health rapidly deteriorated and our family 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 our entire family felt, on finding an integrative practitioner who was able to provide appropriate healthcare, was immeasurable.

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.



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**From:** [REDACTED]  
**Sent:** Saturday, 22 June 2019 12:36 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

Dear AHPRA

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

I have chosen to see Integrative Medicine doctors because conventional medicine has provided no answers about why I am sick with ME/CFS, Fibromyalgia and Chronic Inflammatory Response Syndrome (CIRS), neither have they provided good treatments for these conditions.

One of the conditions I suffer from is Chronic Inflammatory Response Syndrome (CIRS) due to water-damaged buildings. Only integrative practitioners have helped me with this condition, a condition which the House of Representatives undertook an inquiry in last year. The final report by the inquiry can be found at [https://www.aph.gov.au/Parliamentary\\_Business/Committees/House/Health\\_Aged\\_Care\\_and\\_Sport/BiotoxinIllnesses/Report](https://www.aph.gov.au/Parliamentary_Business/Committees/House/Health_Aged_Care_and_Sport/BiotoxinIllnesses/Report)

The submission I wrote for the community group Toxic Mould Support Australia, to the inquiry can be found here:

[REDACTED]

From the Chair's forward: "The Committee has put forward recommendations aimed at supporting medical professionals to identify, diagnose, treat, and/or support patients with complex and/or unexplained conditions such as CIRS. Clinical guidelines, outlining a clear path for medical practitioners to follow, could assist in this regard."

Until this happens the vast majority of conventional medical professionals will not be able to diagnose or treat this condition and other complex chronic illnesses.

Kind regards,

[REDACTED]

## **Consultation on complementary and unconventional medicine and emerging treatments**

I wish to express my concerns about proposed changes in regulating practitioners using complimentary and integrative medicines. I have had support from two doctors who practice in this area, complementing each other in their care of me. Both of them regularly share of their recent learnings from having been at professional conferences where recent evidence-based findings are shared.

I believe I have benefitted enormously from their input. When I first started with my doctor about 10yrs ago, my gut health improved dramatically and many symptoms rapidly disappeared. She is well-informed about the kinds of testing that may be helpful e.g. Testing the balance of gut organisms, then treating to ensure the most beneficial balance of gut organisms, a process which has led to dramatic improvements in my gut health. "Normal" GPs aren't trained to use these kind of tests. She has used vitamin and other supplements to improve my health, using evidenced-based blood testing e.g. To ensure the balance of copper and zinc are at an optimal level. She has also supported my husband who now has early dementia. Without her support over the past few years, I believe he could well have been in a nursing home already.

From my experience, I am concerned at the possibility of integrative medicine being linked with "unconventional" medicine. It may be a different approach but this approach is rigorously researched and promises much more holistic solutions to health issues.

  
Terrey Hills NSW



[Redacted Address]

Date: 19 May, 2019

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TO WHOM IT MAY CONCERN.

My Name is [Redacted], and I have a Daughter, [Redacted] who has suffered for 19 years with a serious illness that no Doctor or Specialist, to this date, has been able to cure or diminish.

It was distressing to her, and her Family, to hear her coughing with long bouts at a time for many years and being unable to have enough energy to leave the house more than an hour every few weeks. There appeared no remedy available from traditional Doctors and Specialists.

It was only in the last 3 years when [Redacted] has been under the care of an Integrative Doctor, that she has found some relief from her persistent coughing, and consequently, has more energy to undertake some basic daily living activities that we all take for granted.

That doctor has given [Redacted] a new lease of life, which we, as her Parents, can only be extremely grateful.

If, as we understand it, there is a move afoot to limit and control what Integrative Doctors can prescribe, then it appears that our hopes for [Redacted] to eventually be cured, or at least be stabilized, by her Integrative Doctor, will be sorely dashed.

We, as Parents of a beautiful Daughter, who has suffered so long without a cure in sight, strongly urge those in Authority, NOT to limit the things that her Integrative Doctor can prescribe. In this way, we can hold out hope for a remedy that will bring much joy to [Redacted] her Parents, and our whole Family.

Sincerely,

[Redacted Signature]



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**From:** [REDACTED]  
**Sent:** Friday, 17 May 2019 12:37 PM  
**To:** medboardconsultation  
**Subject:** Integrative Doctors

To whom it may concern,

I am emailing to express my concern as I understand you are looking to limit and control what Integrative Doctors can prescribe and by doing this, are therefore looking to control and monitor their practice. As someone who regularly sees an Integrative Doctor, I have seen great improvement to my long term illness (having seen no such improvements from my regular GP) I feel that this is a significant limitation on my rights to seek appropriate medical care and attention that I desperately need. There is no other medical professional (knowledge or advice) who has achieved this level of success with my condition over the last 19 years ( and I have seen many)

If I no longer have access to my Integrative Doctor's knowledge, experience and support - I strongly believe that my quality of life and ability will be greatly diminished for the remainder of my life. It is very distressing and DAMAGING to my health to hear that there is a possibility of losing access to my Integrative Doctor who has been instrumental in improving my health.

I want to continue to improve my health in this manner until I am fully recovered.

I'd appreciate it if you didn't limit my Integrative Doctor in any way, to allow for my total recovery.

Many thanks for your consideration.

Kind Regards  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, 17 March 2019 9:54 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

To whom it may concern

As an Australian citizen/resident 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:

- Constipation
- Thyroid Goitre
- Adrenal Fatigue and
- General Fatigue

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) 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 mineral to address my problem 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 my health will deteriorate and have a continuing impact on my family, my work and my wellbeing.

Concerned  
It's all about having a choice  
Name: [REDACTED]  
Signature: [REDACTED]  
Date 17/03/2019

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**From:** [REDACTED]  
**Sent:** Monday, 1 April 2019 8:07 PM  
**To:** medboardconsultation  
**Subject:** Integrative Medicine Drs

I think the AMA should look at the damage they do to their patients.

40yrs back in the Illawarra raising a daughter i turned to Natural Health 30yrs ago because all local Drs did was was her on antibiotics/antihistamines every 3 months, scarred her with hospitalisation for removal of whatever.

After being hospitalised in a local ED & transferred to a male cardiac ward for 4days/nights, with a different medical team daily, who repeatedly asked the same questions, never once agreeing what caused my fainting episode that took me to Hospital, having painful catheters left in causing bruising, wrong tape used causing allergic reaction on skin, woken every few hours to have blood pressure taken, which was normal each time, temperature the same, no pain at any time anywhere, except for what they did to me in Hospital, i would opt for Integrative Medicine/Natural Health anytime.

I received an Email middle of my 5 days in Hospital, from a Medical Dr in Florida stating he always used Magnesium with his patients, instead of anticoagulants and beta blockers, which the Hospital put me on, including anti coagulant injections in the stomach which caused massive bruising (see attached).

I was already on an organic magnesium at home and taken salmon oil capsules daily.

Tell me which you would prefer! Patients should always have their choice.

[REDACTED]

Age 70

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**From:** [REDACTED]  
**Sent:** Tuesday, 9 April 2019 7:31 AM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

Having turned to Natural Health 30yrs ago because of the medical treatment of my daughter through primary school, antibiotics/antihistamines every 3 months and an unnecessary hospitalisation for removal of wart like pimples, the more i see of medical the more i prefer alternative therapies.

It is our god given right to choose the treatments we need and to remove the natural therapies from Health Funds is wrong.

Functional medicine can and should always be the patients choice and no Dr should be discredited for practicing in this way.

TTAC Truth About Cancer shows the way.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 26 June 2019 3:31 PM  
**To:** medboardconsultation  
**Subject:** Proposed changes to complimentary treatments with qualified health practitioners in Australia

I am appalled at the proposed changes by AHPRA with regard to the above.

I turned to Natural Health 30yrs ago and will always be my preferred choice of care.

You cannot and must not do this to Health Care in Australia, would be shameful of you!

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 26 April 2019 7:51 AM  
**To:** medboardconsultation  
**Subject:** Medical Board Submission

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: Hashimoto disease, Hyperthyroidism and menopause

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,

[REDACTED]

26/04/2019

To MBA

I'm a male aged 44 and have been seeing an integrative medicine Doctor for the last 18 months. I have had many issues over the last 3-4 year but symptoms appeared sporadically before that. The main issue was fatigue. I struggled to stand for even short periods, could no longer do outdoor activities that I was used to. I used to surf and fish frequently and paddle my kayak 15km in the open ocean. I was just about house bound. I sort help through conventional GP's, up to 5 over a period 2 years. I'd sort a new GP every time the doctor said they didn't know how to help me. I found this very distressing, I thought a GP would at least be able to point me in the right direction, I was wrong. I finally went back to a new GP who sent me for more blood tests this time, testosterone was tested. My testosterone was found to quite low a likely source of my fatigue.

My next point of call was my local endocrinologist where my bloods were tested again and found I had a mid- range PSA. I did challenge her in some of her thoughts on testosterone therapy and high PSA, which I read up on extensively. These were rejected categorically. I could not start form of testosterone therapy until my prostate was checked. I had a prostate biopsy that was found to be clear, this was performed by the urologist. Upon getting my results from the urologist, he suggested there was no need to go back and see the endocrinologist "just get your GP to prescribe testogel", was his exact quote. Looking back I think this was terrible advice given to me and cost me much more time being sick. I checked my T and E after I started testogel, noticed my feet had swollen up and were red. I have not returned to that endocrinologist or urologist. They work out of the same practice and are husband and wife. At this point I was totally lost, I had lost faith in GP's knowledge, and seemed like the specialist I saw were 10 years behind current medical studies I was seeing from the US and elsewhere.

More reading online I found a doctor that specialises in male hormone replacement. I saw him and found he mirrored my thoughts and the information I found online. Over a period of 12 months I got my testosterone and oestradiol back to good levels. This helped my fatigue but I seemed to plateau and go backwards again. This is when I found an integrative medicine Doctor. The whole experience was great, long consultations meant we could go back over everything that has happened and explore other factors such as diet, injuries and infections. My first appointment was 1.5 hours. He was the first doctor that actually gave me a physical examination. This is shocking after I had been to 5 GP's, the most they done was do a blood pressure check. Through some faecal and blood tests, I found that I had immune responses to dairy and oats, I ate dairy every day, and oats couple times a week. The doctor also gave me a diet to follow, I lost 12 kilograms and my stomach is the best it has been in my life. I believe this may have been to root of my issues. The doctor had found pain in the upper right quadrant. He said this may have been caused by some inflammation in that area. This went away in about 4 weeks after starting the diet. No dairy, organic meat and large rainbow salads. No bread, flour and sugar. I no longer drink and have no bad hunger pains. I'll stick to this diet for the rest of my life. This diet has also helped my mental health, while going through the up's and downs of trying to find answers, my mental health had dropped.

My current state is about 85%, without the doctor's help I'd still be around 30%. I still have some issues with my thyroid, my doctor was trying to sort out. He is currently deregistered because of the issues you have with integrative medicine. You have done a disservice to all his patients, now I'm stuck again, I'll have to find a doctor with his knowledge, that won't be easy. I have nothing but positive outcomes from my time seeing this doctor. I have taken some mineral supplements that I have no issues with or side effects. I have had to travel to [REDACTED] to see this doctor from [REDACTED] 3-4 times, but these costs are well worth it because I'd still be on the GP merry go round.



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**From:** [REDACTED]  
**Sent:** Saturday, 4 May 2019 11:26 AM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

To whom it may concern,

**I am registering my dismay and disgust at the current attack on integrative medical practitioners.**

**Integrative medical doctors combine the best of conventional and complementary medicine into clinical practice to do preventive medicine, manage complex illness, and care for patients for whom conventional medicine has failed or even harmed.**

I have sought out integrative doctors for myself and my family. These doctors have invested countless hours and their own money in learning and integrating new skills, becoming knowledgeable in nutritional and environmental factors that influence health, accessing up to the minute research and information that puts them in a position where we have a chance to work out why illnesses and imbalances are arising and how to mitigate or reverse the damage and recreate health.

I am a pharmacist. It was only after abandoning conventional doctors and automatic prescriptions, and educating myself with the help of functional doctors and integrative practitioners was I able to clear up allergic rhinitis, allergies to animals and plants, manage food allergies, fatigue, overweight, irritable bowel, depression. Many of these conditions were previously exacerbated by the advice and treatment of conventional doctors who are dictated to by Big Pharma. They are often the last to hear about and or embrace new science, new discoveries and new treatments – except for those pushed by the pharmaceutical companies.

There is a health crisis and you are making it worse by denying correlation and causation that questions your authority.

**Integrative medical doctors combine the best of conventional and complementary medicine into clinical practice to do preventive medicine, manage complex illness, and care for patients for whom conventional medicine has failed or even harmed.**

The only stakeholders who would benefit from limiting the scope of integrative and functional medicine practitioners are the pharmaceutical companies and medical establishment who are determined to dictate “rules” of medicine rather than allowing doctors to practice the basic principles i.e. considering every patient’s unique presentation, make-up, situation and providing the most appropriate care, advice, support and treatment that might involve something other than drugs and/or surgery.

I have sought out integrative doctors for myself and my family. These doctors have invested countless hours and their own money in learning and integrating new skills, becoming knowledgeable in nutritional and environmental factors that influence health, accessing up to the minute research and information that puts them in a position where we have a chance to work out why illnesses and imbalances are arising and how to mitigate or reverse the damage and recreate health.

**Integrative medical doctors combine the best of conventional and complementary medicine into clinical practice to do preventive medicine, manage complex illness, and care for patients for whom conventional medicine has failed or even harmed.**

Imposing a new set of guidelines on their practice would in effect create a two tier medical system, with different guidelines for 'conventional doctors' and 'integrative doctors'. The first step, in any form of political bullying, is to create a division where none should exist. Doctors involved in **There should be only ONE set of good practice guidelines that ALL doctors should follow.**

**Integrative medical doctors combine the best of conventional and complementary medicine into clinical practice to do preventive medicine, manage complex illness, and care for patients for whom conventional medicine has failed or even harmed.**

The MBA regulations group "complementary and unconventional medicine and emerging therapies" into a single definition. This is unreasonable and unjustifiable within a scientific framework. Such a definition has a political motive to separate the perceived good doctors who follow conventional medicine from the bad doctors that question the boundaries of conventional medicine. Doctors who practice complementary medicine within Integrative Medicine have nothing in common with "unconventional medicine" or "emerging therapies". It is estimated that one third of Australian GPs utilise some aspects of complementary medicine within their medical practice, so it could even be argued that this is current conventional medicine.

Integrative Medicine is arguably the safest type of Medicine, and the only way to make a case that it needs additional regulation is by linking it with unsafe practices.

Integrative Medicine doctors are educated beyond the usual general practice training to address prevention, chronic degenerative diseases, nutritional and lifestyle-related illness and disability. These are the conditions that take time that the average doctor does not have readily available, leaving many patients unsatisfied and inadequately treated within conventional 10-minute medicine. Integrative Medicine doctors have an important role in the community of managing such conditions using safe and effective complementary medicine approaches when conventional medicine is unable to help.

If the proposed regulations go through, doctors practising safe and effective Integrative Medicine may find themselves breaching the regulations, and subject to disciplinary action from the Board's regulatory branch, AHPRA, including deregistration.

This is not acceptable and how it would very much adversely impact me, my family and my choice of healthcare provider.

Regards,



B Pharm

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**From:** [REDACTED]  
**Sent:** Sunday, 30 June 2019 11:22 AM  
**To:** medboardconsultation  
**Subject:** Complementary Medicine

Hi there,

I am not quite sure who I am addressing this to, but my name is [REDACTED] and I am a firm believer in complementary or unconventional medicine.  
I should start with how I got into this stuff;

When I was 16 or 17 I started to get very drained from everyday life. It started with just being tired after school, struggling to do homework and making sure I was getting early nights. But soon I was sleeping 12 hours a night, waking up exhausted and after school taking 2 hour naps to wake up, eat and go back to bed.

I can't even begin to explain the profound impact my fatigue had on me and the people around me. I began to lose weight very quickly, and by Christmas time 2017 I was 48kg (for some perspective I am 172 cm tall). I could not complete any work after school, I could not participate in sports training, study groups and much more. By lunch time I would be hunched over my desk struggling to keep awake. It was so bad my teachers would open empty classrooms to let me lie in the dark, they wouldn't expect any work from me regardless of whether or not I had the "doctor's certificate" my school required. This was all because I could see and they could see, how effected I was by my chronic fatigue.

Lucky for me, my mother had a similar experience and had seen a doctor that specialised in "unconventional" medicine. He performed the standard tests on my thyroid which came up with nothing. To hear that everything was normal made me want to cry, because I knew, and everyone around me knew it wasn't. But he went further than a regular GP would and tested for the presence of specific hormones in my body, and it was discovered that I had low levels of T3 and reverse T3.

When he started me on the T3 supplements I can honestly say to you it changed my life. I was well aware that the treatment was considered a supplement and that it posed risks, like any normal treatment. But taking the step to see a practitioner who specialised in unconventional medicine has been the single best decision I have ever made. I now play sport, am active, work hard at my uni degree and have the energy to invest time into my friends and family.

I cannot stress enough that people need the power to make decisions for themselves, every medical treatment comes with possible risk and reward, and to weigh these out and form one's own decision is integral to medicine. How can medicine evolve without this process? I know that without this process I would not be able to be the happy and healthy person I am today. Please, do not take this opportunity away from others. Please don't take it away from me.

Sincerely,  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 12 April 2019 4:25 PM  
**To:** medboardconsultation  
**Subject:** Regulation of medical practitioners who provide complementary therapies/integrative care

Dear Sir/Madam,

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: food intolerance's, thyroid problems and migraines. In the past my children have also had several health problems successfully treated by an integrative doctor.

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 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 well being.

Freedom of choice in medical care is the basis of every democratic society-please ensure this remains in Australia or I fear for our future health and that of my children and future grandchildren.

Concerned Australian,

[REDACTED]

12/04/2019

## Medical Board Submission

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

As an Australia 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 hashimoto's disease, allergies, digestive disorders since my early twenties.

Conventional medical doctors have not been able to successfully treat my conditions, I have taken a variety of prescription medications including thyroxine, HRT, anti-inflammatory drugs, anti-viral drugs. While some of these relieved symptoms for a short time the end result was unwanted side effects and the need to go off the prescription taking me back to the beginning again.

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

If I cannot see an integrative doctor or there is a limitation to the available prescriptions my health will be seriously compromised and will deteriorate as before. As a business owner and member of a large family it will impact all – family, work and wellbeing. I am well for the first time in 20 years, freedom of choice is of utmost importance to me.

Regards

[REDACTED]

13/4/19

24 March 2019

## Submission to the Medical Board of Australia

I make this submission in support of integrative medical professionals being able to practise in Australia and the assistance and treatment they provide to my beautiful friend in her health battles, [REDACTED]

I met [REDACTED] in 2004 and we have been friends since then. In 2015, [REDACTED] became unwell after returning from a trip to the United States of America. Over 47 doctors/specialists, multiple incorrect diagnoses' and treatment, over two years later, and after posting blood to America to be tested, [REDACTED] was diagnosed with Lyme Disease. Finally, an answer...

Since then, I have lost one of my closest friends (for now at least). She does not get to enjoy her life and make new experiences like myself and other 27 years olds do. The disease she has is debilitating, to say the least. She has experienced intense and excruciating pain, hallucinations, migraines, extreme nausea, fatigue and the dreaded, HERX reactions, not to mention having to stick huge needles in her body every day.

As a result of this disease not being recognised in Australia, [REDACTED] had to travel overseas for treatment and assistance. First to Cypress for ozone therapy and then to Malaysia (twice) for hyperthermia treatment, when your body is heated up to extreme and dangerous temperatures. [REDACTED] has spent thousands and thousands of dollars to access treatment and it's not over yet. She continues to spend about \$5,000.00 **PER MONTH** on the medication she requires on her battle to get better. Medication she is able to access with the assistance of integrative medical professionals.

[REDACTED] is one of the strongest and resilient people I know. The treatment that [REDACTED] receives with the assistance and ongoing support of integrative medical professionals is a necessity for her to continue her journey of killing this horrible disease, getting to good health and moving forward with her life. It gives her hope of a bright and healthy future.

[REDACTED] is not alone. This is just one story and there are many others out there who need integrative doctors for treatment of Lyme Disease and other diseases not recognised in Australia or diseases which require unconventional treatment. Nurses and doctors, and the public generally, are uninformed about these diseases. If the doctors in Australia were able to recognise [REDACTED] symptoms and diagnose her sooner, perhaps she wouldn't be where she is today. These people deserve access to treatment, in their home country.

I want my friend back. If the already limited treatment that is currently available to [REDACTED] is taken away from her, I am not sure how this will be possible. Therefore, in my submission, medical professionals, and the incredible treatment they provide to my friend [REDACTED] and many other people, should not be prohibited from practising in Australia.

[REDACTED]  
[REDACTED] Australia

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**From:** [REDACTED]  
**Sent:** Friday, 28 June 2019 1:22 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments

I support option 1.

In my case a GP tried to diagnose me with depression because of unrelenting exhaustion and ongoing fatigue. I would not accept this and after seeing several GP's finally found a integrative Dr who took the time to properly consult with me and ended up ordering tests that found Ross River Virus, Hypothyroidism and Adrenal insufficiency. If I had listened to the first dr I would be on anti depressants and still no better. A 10 min consult to a under pressure GP is not the answer to better health.

- 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

Regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 30 May 2019 12:47 PM  
**To:** medboardconsultation  
**Subject:** Denying freedom of choice

I am almost 85 years of age. I still play good tennis(with people, some of whom are 20 years younger). I am able to compete, AND look 20 years younger because of the assistance and treatment I have received throughout the years from complementary/integrative doctors, and for that matter, naturopath AND "Standard" doctors,and my own efforts.

I inherited less than helpful genes which has led me to have an absolute OVERLOAD OF CALCIUM IN MY ARTERIES, plus VERY HIGH HOMOCYSTEINE.(This can lead to dementia)

Because of my treatments I now have cleared arteries and so far have a VERY clear mind. I am mindful of everything I eat,AND, you may **have forgotten BUT Hippocrates said ..."LET FOOD BE THY MEDICINE"**

**He was SO right!!** Unfortunately, it is not easy to find food not tainted with pesticides, water without fluoride etc,etc.

**It is ALL ABOUT MONEY.**

BEcause people ARE able to consult with other than standard physicians it saves the taxpayer a great deal of money. There are no deductions allowed in the tax system for costs borne by individual taxpayers for "natural" treatments provided **by these saviours.**

***For instance, I thought "DO NO HARM"was still a current protocol!!!! It obviously, and sometimes criminally, is not!***

The medical establishment SHOULD be adding ascorbic acid when providing chemotherapy to patients. **Even I know that this would-No.1-alleviate the horrible after symptoms, and No.2-assist the chemo to do a better job!!**

So why is the profession NOT doing this?. **THEY ARE DELIBERATELY HARMING patients by withholding this treatment** just because -what? You do not want to admit you are wrong or ignorant ?????!You are not keeping up with the latest science?You don't care ?

I know a lot of it is not individual doctors fault. They have been indoctrinated and possibly bribed by the pharmaceutical industry. My own father was a country doctor and a master surgeon That was in another era when health care was a vocation-not a licence to make money(Not everyone is included in that.-there still are some very good doctors who have OPEN mind!!)

**Lastly, I WANT THE FREEDOM TO MAKE MY OWN CHOICES-FOR BETTER OR FOR WORSE. ARE WE STILL A DEMOCRATIC COUNTRY OR ARE WE NOT???**

**Surely there must be some people in your organization who are enlightened????????**

**Why would so called professionals deny treatments that WORK??**

**You** possibly know this already, but doctors in the US go to Germany for cancer treatment because hey know that the old cut/ burn/,poison/routine now over 50 years old, for the most part does not work.Germany, it seems, is more enlightened than the USA?

So where would YOU go for treatment for this insidious disease?And others.

It seems that a lot of people now want to turn us all into Socialists or Communists-I sincerely hope this is not the case in this seeming effort to deny a portion of the population effective, but different, methods of healing.



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**From:** [REDACTED]  
**Sent:** Friday, 1 March 2019 12:23 PM  
**To:** medboardconsultation  
**Subject:** Consultation on Complementary and unconventional medicine and emerging treatments

1<sup>st</sup> March 2019

TO WHOM IT MAY CONCERN

**Consultation on Complementary and Unconventional Medicine  
and Emerging Treatments.**

Name: [REDACTED] (Retired)

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

I have been suffering from Myalgic Encephalomyelitis (Chronic Fatigue Syndrome – diagnosed at Newcastle University), Fibromyalgia and Adrenal Fatigue.

Conventional medicine has not been able to help my condition. However, after seeing an integrative medical practitioner, who included diet, supplements, prolotherapy, my condition improved.

This condition is ongoing so I need to see an integrative medical practitioner at regular intervals. I have been helped by the integrative doctor to the degree that I can manage my condition with his help and therefore play a part of volunteering in the local community.

If it is not possible to consult an integrative doctor, I feel my health will decline having an impact on my wellbeing.

Yours faithfully

[REDACTED]  
1.3.2019

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

**Who are you?** I'm a 38-year-old female. Email address is [REDACTED]

**What are your main long-term health problems?**

Chronic Fatigue Immune Deficiency Syndrome (CFIDS) and Fibromyalgia - brought on by severe gut infections that I contracted whilst living in South-East Asia as a teenager. I have been recovering for over 10 years. My immune system was so bad that I was having to take antibiotics for a variety of infections every two months and spent most of my days in bed. My stomach was always bloated, and was in immense pain – no matter what I ate or avoided. I was exhausted most of the time and did not have a social life and could not work and was deeply depressed. I now live a normal life after finding my integrative doctor 3 years ago. I am now no longer a sick person and do not identify with having CFIDS or Fibro and my immune system is greatly improved. I do not have bloating. I do not have any pain. I can eat mostly whatever I wasn't but choose to avoid gluten and dairy when I can. I have an amazing social life, work life and am back at university studying again after 20 years. I am not depressed any longer and wake up feeling excited about the days events. But for the 7 years prior to this I was none of these things.

**What treatment did you undertake before you found an integrative health practitioner?** I took many broad spectrum antibiotics and completely changed my diet cutting out gluten, wheat, dairy. I also followed the GAPS diet recommended by my gastroenterologist. When I had a colonoscopy, the gastroenterologist said he found nothing strange in my bowels and to just take probiotics....which of course I did. Nothing changed. The regular stool sample tests for parasites and bad bacteria offered to me by the gastroenterologist, immunologist and regular GP's picked up NOTHING.

**Describe what changed in your treatment when you found an integrative health practitioner. Also Describe the effects of that treatment, including side effects, and the impact on your physical and mental health.**

The first thing that took place was that I did a stool test that I had never heard of before that could only be offered by specific integrative doctors. I heard about this doctor and this gut test from a colleague who had greatly improved from Lupus and was no longer on any steroids due to seeing this doctor.

The new stool test showed that I was riddled with bad bacteria from south-east Asia as well as some parasites, and that my gut microbiome was in complete dysbiosis. The doctor immediately put me on a gut health protocol that involved specific herbs, supplements and a compound antibiotic (made at a compound pharmacy) which I began a few weeks later. Initially the die-off was very difficult. But by the end of the first month of this protocol I noticed a big shift in my energy levels. After the second, third and fourth gut protocols (with all of the same antibiotics and supplements), I was back at work casually and began to do house chores and grocery shopping which I had not done for 7 years and relied on my husband to do most housekeeping.

Over the last three years since finding my integrative doctor I have conducted 6 gut protocols and am onto the 7<sup>th</sup> one now. My health has completely turned around. I live a normal life. I am studying uni full time and working part time. I can do the groceries, catch up with friends for dinner and do the housework. I can exercise and now run 5 kms a few times a week. This is no joke – I am a completely different person and now have an amazing quality of life.

My family and friends now have the old person back they once knew. My husband doesn't have to carry such a heavy load and is enjoying life much more. We are enjoying life together now. I am so lucky that he stuck with me through all of it. I am a much better daughter, wife and friend as I have energy to give back and have energy to have fun again and enjoy life in this beautiful country.

**Emphasize any positive qualities about the standard of care from the medical practitioner.**

My integrative doctor gave me 45 min – 1 hour appointments at every consultation. He took the time to really study my gut test results and other blood tests as well to find the correct solution to my problem. He listened to me when I was crying in his office saying I didn't think I could go on...and he told me that he believed me and that it wasn't in my head and that he would help me get better and get my life back. I felt so relieved that I had finally found a practitioner that was going to invest time in my case and fix me.

All of the other GP's I saw, the immunologists and the gastroenterologists said the tests showed nothing, therefore there was nothing wrong with me and they suggested I take antidepressants and do more exercise. But they were doing the wrong tests and prescribing the wrong antibiotics for me which only made me sicker and made my immune system worse.

**FINAL NOTE:** Please Please Please don't shut down integrative medicine and other alternative therapies. I know so many people that have benefited from this type of practice. And whilst western medicine is very helpful and effective for acute conditions and emergencies and serious diseases, it did not help me for my chronic immune system issues or chronic fatigue syndrome or my chronic gut microbiome dysbiosis. There has to be a place for all types of practice – the body is a complex system and a one stop shop is not always for every one.

Sincerely,

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**From:** [REDACTED]  
**Sent:** Sunday, 24 March 2019 2:57 PM  
**To:** medboardconsultation  
**Subject:** complementary and unconventional and emerging medicine

To Whom it may concern

My name is [REDACTED] and I live in NSW.

My daughter has suffered from Chronic fatigue for now 3 years. After lots of doctors she saw, didn't believe in her illness we finally found someone who is willing to think outside the box and try and incorporate different types of medicine which are slowly shifting things for my daughter. She uses alternative supplements to complement her "normal" drugs that for example treat her POTS symptoms. I value the choice I have to choose different approaches where simple medicines or no medicines have failed my daughter before.

I would really like to see that the board accepts Integrative Medicine that doctors use to treat patients like my daughter. Therefore I'd like that patients like my daughter get increased Medicare rebates to help with the enormous cost and the cost fulfilling the new regulations.

Kind regards  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 28 June 2019 8:55 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 on different occasions and for different members of my family chosen to see integrative or complimentary medical practitioners. I also see a regular GP for small issues but turn to intergrative medical to manage my families overall health. The general health services do not provide the kind of in-depth, holistic treatment and management of my health that I prefer.

For example my daughter was fully supported by our integrative doctor to manage a range of behavioural and physiological issues that other Drs were unwilling to acknowledge let alone treat. She is now a happy healthy and well adjusted child.

I feel that having access to integrative medicine with the knowledge that such practitioners have the medical training as well as the ability to see beyond an illness to the whole person Is the best way to be healthy long term.

I want the right to seek out the quality of medical care I want and can only find through integrative medicine and I want it to remain accessible.

I do not believe the MBA is being transparent enough with their case against integrative medical practices. As a consumer we have right to know what and why integrative medicine is being challenged in this way especially when there does not appear to be evidence put forth for adverse risk.

Regards  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, 7 April 2019 3:03 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments

I am utterly disgusted by this attempt to discredit Intergrational Practitioners.

As someone who has had Chronic Fatigue/ME for close to 20 years, this feels like a big slap in the face to those in the chronically ill community.

I am a member of a Chronic Fatigue support group and there is a huge amount of support for these kinds of practitioners, who have made a great difference in quality of life for many members. We are sick of being dismissed by arrogant conservative western medicine practitioners, many of whom deny the very existence of CFS/ME at great detriment to our mental health.

This is the way of future medicine. Please stop dragging us backwards and taking away our choices.

Sincerely,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Saturday, 29 June 2019 5:14 PM  
**To:** medboardconsultation  
**Subject:** CONSULTATION ON COMPLEMENTARY AND UNCONVENTIONAL MEDICINE AND EMERGING TREATMENTS

Dear Executive officer,

I am writing to request that the MBA does introduce new legislation to have separate guidelines for Integrative Medicine (IM) doctors to conventional medical (CM) doctors.

It is important that IM doctors and CM doctors have the same guidelines. Only IM doctor can be expert witness in court for EHS victims, and only IM doctors can successfully treat EHS patients.

EHS is a global crisis, and our community needs these health professionals.

Integrative Medicine also saves lives when Conventional medicine has failed. CM doctors not trained in nutrition, lifestyle and prevention and are not able to treat the whole person.

There is no evidence of harm from IM. We should have the freedom to choose our own doctor

Thank you,

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 15 March 2019 10:07 AM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

To whom it may concern

Im writing in regard to the public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments.

I have a very high level of breast cancer in my family and my regular GP suggested I go to an integrative doctor for personally compounded hormones specific to my particular hormone deficiency. She informed me that anything she could prescribe me was synthetic and not up to the standard of personally compounded hormones.

I have also completely reversed my Hashimoto's or under active thyroid through changing diet and to gluten free, dairy free and increasing my seafood intake. I am extremely proud of the fact that I have achieved this without drugs. I feel that simply taking medication would not have been able to successfully treat my condition and give me the satisfactory level of health I have today.

I think I have the right to choose whether I cure myself through conventional or nonconventional methods of treatments. Sometimes treating the cause and not simply masking the symptoms with pharmaceutical drugs with harmful side effects, is better for certain people. Not to mention a waste of medical funds and resources.

We the patients of Australia have the right to choose how we cure our bodies, not the medical board. Laws and regulations are here to protect us - the governed, not you the medical board - the governors.

Thank you for your consideration of my application.

Kind regards

[REDACTED]

Language teacher &  
Pilates instructor

15/03/19



**From:** [REDACTED]  
**To:** [medboardconsultation](#)  
**Subject:** To whom this may concern  
**Date:** Wednesday, 13 March 2019 10:51:51 AM

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I am emailing to express my concern that you are looking to limit and control what integrative Doctors can prescribe and, by doing this, are therefore looking to control and monitor their practice.

As someone who regularly sees an integrative Doctor, with great success and improvements to my illnesses, having seen no such success from my regular GP, I feel that this is an abhorrent limitation on my rights to seek the appropriate medical attention. To put these limitations in place is to not only deny my individual rights, but will also deny thousands of other patients their rights to appropriate treatment and also to those professionals who worked very hard to gain their accreditation in their respected field.

I have been to so many GP and most of the time they are quick to prescribe an antibiotic or steroids without going into detail of my problem. Majority of the time the problem reappears as soon as the antibiotics or steroids wear off. I got so much relief from an integrative doctor as it is an all-round treatment of my problem rather than a Band-Aid solution that wears off within days.

Even specialists offer band aid solutions that are of no use. Recently my family member went to a skin specialist for a skin issue. He paid him around \$350.00 only to be prescribed steroids that wore off within days. The skin disorder remained and we were out of pocket by \$350. So if you want to monitor a medical practice I suggest you should start with specialists and their high charging practices.

It is my integrative doctor that helps me manage my illness. Without the integrative doctors I would be in a bad state. I hope you consider my application and not control or stop their practice.

Regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, 25 June 2019 10:35 PM  
**To:** medboardconsultation  
**Subject:** Re: To whom this may concern

I am emailing to express my concern that you are looking to limit and control what integrative Doctors can prescribe and, by doing this, are therefore looking to control and monitor their practice.

As someone who regularly sees an integrative Doctor, with great success and improvements to my illnesses, having seen no such success from my regular GP, I feel that this is an abhorrent limitation on my rights to seek the appropriate medical attention. To put these limitations in place is to not only deny my individual rights, but will also deny thousands of other patients their rights to appropriate treatment and also to those professionals who worked very hard to gain their accreditation in their respected field.

I have been to so many GP and most of the time they are quick to prescribe an antibiotic or steroids without going into detail of my problem. Majority of the time the problem reappears as soon as the antibiotics or steroids wear off. I got so much relief from an integrative doctor as it is an all-round treatment of my problem rather than a Band-Aid solution that wears off within days.

It is my integrative doctor that helps me manage my illness. Without the integrative doctors I would be in a bad state. I hope you consider my application and not control or stop their practice.

Regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, 24 February 2019 8:45 AM  
**To:** medboardconsultation  
**Subject:** To whom this may concern

Hi,

I am emailing to express my concern that you are looking to limit and control what integrative Doctors can prescribe and, by doing this, are therefore looking to control and monitor their practice.

As someone who regularly sees an integrative Doctor, with great success and improvements to my illnesses, having seen no such success from my regular GP, I feel that this is an abhorrent limitation on my rights to seek the appropriate medical attention. To put these limitations in place is to not only deny my individual rights, but will also deny thousands of other patients their rights to appropriate treatment and also to those professionals who worked very hard to gain their accreditations in their respected field.

The integrative doctors have helped me bring down my illnesses and now I am able to continue with my day to day life, without my integrative doctors and their prescriptions I am likely to end up again in a hospital for months.

Please let the integrative doctors continue what they are doing to the human service.

Kind Regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 5 April 2019 12:57 PM  
**To:** medboardconsultation  
**Subject:** threat to integrative medicine

I am deeply upset, and sick to my core to read you plan to impose censorship of health giving integrative medicine in Australia

I have lyme disease, caught in this country by a tick in Qld, taken out by a dr in this country but my support for the illness by a general GP is 'it doesn't exist' or they ALL try and give me anti-depressants – I knew that wouldn't help. The road has been tough enough without looking like you are crazy with a failing body.

I eventually found an integrated doctor that understood the symptoms and what was required to increase my wellness. Slowly I have been improving by increasing my immunity to be strong enough to kill off the lyme and co-infections and mold. I would never have improved in this country without these doctors.. without them it would be treatment overseas would have been my only option – and that is plain crazy.

PLEASE PLEASE PLEASE support our wonderful integrated doctors, as people are becoming sicker with more mystery illnesses we need to support them

I hope your response will be favourable.



## **Feedback on the Medical Board of Australia's consultation on the regulation of practitioners who provide complementary and unconventional medicine and emerging treatments**

My name is [REDACTED]. I am 66 years old and I live on [REDACTED] in Queensland. I am happy for this personal information to be placed on the record.

In 2016 I was doing contract work as an adult trainer in [REDACTED]. About June that year I began suffering heavy fatigue and mental exhaustion even though my work load was very light at the time. The fatigue become so great that I found it necessary to eventually stop work and retire. I had suffered a similar condition while living in [REDACTED] in 2014. At this time I consulted a range of regular medical practitioners including GPs, a psychiatrist, and a specialist in male health as well as a psychologist and a naturopath. Even though I was given numerous blood and urine and other tests, none of the regular medical practitioners were able to give a diagnosis. I became very concerned with the lack of medical professionalism that I experienced. Some of the practitioners offered me anti-depressants without any explanation or diagnosis. Eventually I came to the conclusion that regular medical practitioners lacked the necessary training and knowledge to treat me.

Instead I followed the advice of a naturopath in relation to diet and supplements. Eight months later I felt well enough to return to work in [REDACTED]. However, in 2016, I found my earlier condition of physical and mental fatigue had returned and it was much worse.

This time I decided to find a doctor who specialised in treating my particular condition and who worked with the whole body including a chemical free diet, gut and immune system and whose knowledge and treatment was not restricted to pharmaceuticals and drugs and where consultations are not limited to 10 or 20 minutes. I found such a doctor who gave me extensive tests and diagnosed me as having Chronic inflammatory Response Syndrome. Following 14 months of treatment with a range of very strong non-pharmaceutical supplements, special diet and detoxing program, I am now well on the way to full recovery.

In relation to the Medical Board's proposal:

1. I am very concerned that any restrictions might be placed on medical practitioners who use non-pharmaceutical treatments. This would severely restrict treatment of patients like myself suffering chronic illnesses as so few doctors have sufficient training in the use of non-pharmaceutical supplements nutrition, the gut, the immune system and environmental factors such as chemicals and mould.

2. I greatly value the treatment I received from a doctor who took a holistic approach to treating my chronic illness and used minimal drugs and other pharmaceuticals.
3. I was impressed with the lengthy (1-2 hour) consultations with my doctor regarding options, merits and potential problems. I had never experienced this quality of service with a standard GP. I was also referred to training and seminars on my condition over the internet.
4. In this day and age where doctors have so little training in nutrition, the gut and the immune system as well as environmental factors, I believe that people should have the right to choose their own medical practitioner without intervention by the MBA.
5. My preferred choice of outcome is:

Option 1, retain the status quo

If the Medical Board decides to choose Option 2, for greater regulation, this should be modified from the current proposal, to ensure that:

- It applies to all medical practitioners with the same onus of exhaustive exposition of all treatment options, research etc.
- 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.

Thank you for this opportunity to make this submission.

[REDACTED]

[REDACTED]

27 June 2019

Dr. S. O'Dwyer  
MBA  
PO BOX 9958

Dear Dr. O'Dwyer

I write in support of patient access to integrative and complementary medicine and doctors' right to provide it.

Two of my personal experiences: I have had extensive benefit for multiple conditions over the years. When diagnosed with a spastic colon in the 1980s I was severely affected over an extensive period. It was like I had a solid broom handle across my abdomen under my belly button. Then I had the good fortune to be referred to a doctor who provided acupuncture treatment. After just ONE session my colon began to function again. It was literally like turning on a machine!

When suffering back pain so severe that I could not even hold a wallet or lift one wet singlet out of the washing machine, I received multiple physiotherapy sessions from more than one therapist – with some reduction in pain. However, I found that the only REAL relief I received was after being referred for reflexology treatments. I enjoyed 7 hours of pain relief after each treatment!

I write to urge for the maintenance of the current guidelines where patients can learn about / be referred for these and other complementary therapies and integrative medicines. Apart from the benefit they can offer patients, CHOICE is very empowering.

Professional experience: I am a speech pathologist and have heard incredible testimonials from parents whose children have been successfully treated by Dr., [REDACTED] a GP trained in Biomedicine. She practices both conventional and holistic medicine in the management of autism, gut disorders, behaviour and sensory issues at the [REDACTED].

Regularly I see the dramatic improvement in behaviour (e.g. severe tantruming) after a client receives dietary advice (e.g. removal of sugar from the diet.)

I consent to my submission being published.

Kind regards  
[REDACTED]  
[REDACTED]



60418338277094

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**From:** [REDACTED]  
**Sent:** Sunday, 30 June 2019 4:42 PM  
**To:** medboardconsultation  
**Subject:** Fw: Consultation on complementary and unconventional medicine and emerging treatments

I choose Option 1...

Integrative medicine changed my life. I was on the brink of resigning from my career due to living with chronic migraine that I had been professionally diagnosed with by my GP. Conventional medicine did nothing but make me dopey. I had never even heard of integrative medicine until I started following pages on Facebook by other chronically ill people where I started hearing "integrative medicine" discussed so I asked what was it? I was urged to look online for a Dr close to me who practiced in this medicine, I was very sceptical but I was desperate. So I did, found a few and looked at their web sites and rang one who I deemed the most professional. I already knew I had the MTHFR gene mutation after a blood test was requested by a naturopath I had been seeing a few years earlier and my gp just shrugged his shoulders and said "so what" no evidence blah blah blah but until I saw this Dr and had further blood tests ran that I didn't realise how badly it was affecting me. I am now on mostly Metagenics brand supplements that support my deficiencies and see a neurologist for Botox treatment every 3 months. I am really happy to say I have turned my life around from working only part time to now full time in a position with far greater responsibilities that I had ever been able to handle before. I'm not cured, migraine is a disease but mine is under great control as long as I take my supplements, eat super healthy and get more than the average amount of rest. I have changed gp and rarely need one, but my integrative dr and neurologist are my life lines, no doubt about it. My neurologist also knew my migraines were linked to something else going on in my body and is super pleased how I have improved and hopes to have me off Botox and on a monthly injection if it can get passed by the government but that's another story. It's all about the money to the government after all, not really about the human life.

[REDACTED]



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**From:** [REDACTED]  
**Sent:** Tuesday, 12 March 2019 7:05 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

As an Australian citizen living in a democratic country, I feel I have the right to choose which methods I use when attempting to solve my chronic health issues .  
After all I thought freedom of choice was what democracy was all about .

Complementary medicine has been far more beneficial to me when treating chronic health issues than so called conventional medicine .

Why would the use of medical drugs be our only option when there are much safer and cheaper options available?

Surely it would be much better and cheaper to have people treated with natural therapy to improve their health than risking the side effects of medical drugs when there is a better way . Of course there are times when medical drugs are called for .

As Hippocrates the father of medicine said to doctors treating unwell people, " First do no harm " and "Let food be thy medicine "

When taking this Hippocratic oath, surely doctors have a duty to abide by the oath they have taken and to use natural medicines when this is the safer course to follow .

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 27 June 2019 10:50 PM  
**To:** medboardconsultation  
**Subject:** Public submission

Dear people at Ahpra.  
I just heard of this so please excuse the format.

In 2014 I managed to get influenza b & as a result a dose of the genuine nasty cfs.

As a result of that I have met with various medical people. Sadly most did not do well.

1) The average doctor could be replaced by a intelligent high school graduate who has completed a advanced 1st aid course.  
2) The mental health service, insecure people trying to make the mentally healthy feel inadequate, suggesting drugs & quite possibly creating real problems where there were none in exchange for medicare \$s & whoever else is gullible enough to pay them ( this particular organization was investigated & prosecuted by medicare some years back for overservicing & in this regard I am waiting for a callback from Ahpra)

3) With particular interest on influenza (& others) , from my personal experience the current situation with the flu is to be very much expected. I was very surprised with the slackness experienced in my case. This probably starts off with the public health service department (protocols) ,the pathology & doctors. We should be grateful that the situation is not a whole lot worse.

4) A few decades ago I rang the [REDACTED] dept of public health regarding heart problems as a result of more sedentary life styles. They actually passed the comment to the [REDACTED] heart research who to their credit rang me (& maybe not to their credit) said there are no problems, today there is a big push to address heart problems which might have been avoided if some were not asleep at the wheel.

5) The mental health industry, what can one say in a positive way ?

Not a lot. Decades ago I was invited (by a friend who is a pshc nurse) to a party of trainee pshc nurses, my first question/impression was "are these the patients or those who care for them".

I have only ever met (recently) a mental health worker/nurse who appeared to be sane (the nurse was caring for a old friend who's situation has been made a whole lot worse by so called well meaning people. Sadly my friend & her supporters do not like this person who is one of the few who has enough integrity to do the right thing by her & the system.

Mental health workers in general have to many bad deeds under there belts for the situation to remain as is, it needs a lot more regulation supervised by mature professionals who are not directly involved in the industry, are on any mind altering drugs or seeing a mental health professional for personal reasons. In addition any health professional who is on mind altering drugs (my mental health nurse friend will hate & say very colorful words about me) should be suspended until the drugs are out of their system. Their protection for malpractice should be considerably reduced & prison terms apply if they are found to have behaved in a irresponsible manner.

To many lives have been ruined by nutters (at best) masquerading as mental health professionals.

With cfs Chronic Fatigue Syndrome. Much research (sadly a lot of repeated duplication) has been done. Latest a proven link in how calcium process in the body has been disrupted.

But a incredibly simple thing with which we have the technology to do quite easily.

Take a sufferer of cfs (various types) put them next to a non sufferer, feed them the same stuff for a few weeks to clear the systems, then start getting them to do exercise whilst measuring the inputs & outputs contents & % (stool, urine, exhalations, blood to body weight.

Cbt, graded exercise can't work, it is a impossibility, it's like trying to talk a currently available vehicle with a flat battery & fuel system blockage out of a bog. Incredibly funny & sad at the same time.

It does not say complimentary things about those responsible. The practice has gone on far to long with no effective outcomes, it questions if those responsible are of "reasonable/average" intelligence.



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**From:** [REDACTED]  
**Sent:** Thursday, 11 April 2019 10:49 PM  
**To:** medboardconsultation  
**Subject:** Submission to the "Regulations governing the practice of Complementary and Unconventional and Emerging Medicines"

Dear Sir/Madam,

I have recently heard about the proposed strict new regulations governing "Complementary and Unconventional and Emerging Medicines"

It appears that those Doctors practicing Integrative Medicine will have increased administrative costs, some will cease practicing Integrative Medicine and the end result will be governed by supply and demand, resulting in increased charges to patients and less patient choice. The need to implement new stricter procedures for Doctors using Integrative Methods, implies that the Board considers existing regulations for all practicing Doctors is not strict enough. The proposed stricter regulations governing only Doctors practicing Integrative Medical procedures is discriminatory.

All patients want the services they chose, to be safe. However, antidotal evidence I have read indicates that integrative medicine has not caused a higher level of complaints than conventional medicine and sometimes is less dangerous than where conventional medicine goes wrong.

I started using alternative medicine in conjunction with conventional medicine in 1959 when I was 20 years old. I damaged my right knee playing field hockey. On the third visit, to a recommended surgeon, he proposed a knee operation. In those days there was a distinct chance of ending up with a stiff knee so I visited a chiropractor and after 5 treatments I was back playing hockey – my knee is still functional at age 79.

In my mid-twenties I took up ultra marathon running, studied privately the impact of nutrition and life style on health. From then till this day, I have found that conventional doctors look to prescribing pharmacological therapies, without reviewing general lifestyle and nutrition.

When needed I choose to visit a Medically Registered Doctor who practices Unconventional and Emerging Medicines and value its' availability as I experience very good results. The doctor I usually visits provides discussion, options for treatment and their relative merits and potential problems.

Almost 2 years ago I had a bad motor vehicle accident and the treatment I received in the [REDACTED] from conventional Doctors was excellent. I am strongly of the view that under normal circumstance a patient should have the right to choose the method of treatment. Research goes on at a hectic pace and new and improved approaches to leading a healthy life through nutrition, lifestyle, treatments, etc., are being discovered every day.

My preferred choice of outcome is:

- To retain the status quo.

If option 2 is chosen by the Medical Board, then the Board should ensure that:

- The changes and onus of exhaustive expositions of treatment options, research etc., apply equally to all medical practitioners.
- That Integrative Medicine, Complementary, Unconventional or Emerging Medicines, be recognized as a Specialty for Medicare rebates.

Thank you for the opportunity to comment,

Your sincerely,  
[REDACTED]

To -

10<sup>th</sup> June 2019

The Executive Officer

Medical

AHPRA

GPO Box 9958

Melbourne VIC 3001

### **Medical Board of Australia Submission RE Integrative Medicine**

I am an Australian citizen and live in NSW. I am 44 years old and I am concerned about the proposal to place restrictions on Medical Practitioners who use Complementary or Unconventional or Emerging Medicine as part of their treatment modality and in turn reduce an individual's choice of successful treatment options and freedom to use these.

I have suffered with Chronic Fatigue Syndrome since I was 12 years old and have battled with severe fatigue, headaches, nausea, chronic infections, muscle pain, brain fog, anxiety and depression. I sought Complementary medicine with various Integrative Medical Doctors and Practitioners when regular main stream doctors said that they could not do anything else to help my symptoms. I was housebound, unable to work or care for my family and had a poor quality of life. During the time that I was under the care of a regular mainstream doctors and specialists, I tried many pharmaceuticals, some of which had terrible side effects, and made me feel worse.

I have been extremely happy with the level of care, concern and professionalism I have received from my Integrative Practitioners. I have always been given information regarding treatment options, test and have used various Complementary, Unconventional and Emerging Medicines of my choice with great success. I have always had the benefits explained as well as rare potential side effects outlined and it has been through my informed decision that I have chosen these treatment options. Many of my symptoms have been reduced with vitamin supplements and natural therapies combined with conventional and emerging medicines that my Integrative Medical Practitioners have prescribed or recommended. Currently I am able to be an actively involved in my children's lives and be in a supportive role to my husband. I am significantly better than I was compared to when the regular main stream doctors said they could do no more. I believe my health would dramatically decline if I was unable to access these treatments from my Integrative Medical Practitioner and it would place a huge drain on those who would need to care for me.

Integrative Medicine is a specialised area of medicine and one that needs to be protected to allow the Medical Practitioners who have studied these areas in depth to continue to provide a specialised area for patients who choose to seek these options. I believe it is very important for Australians to have the right and freedom to choose treatment options of their choice and not be forced into an orthodox pharmaceutical model only.

My preferred outcome would be Option 1, retain the status quo. I believe that there is already an avenue for patients to address concerns and complaints that arise from issues with any Medical

Practitioner, not just Integrative Medical Practitioners, and that this is an adequate for all Medical Practitioners.

Should the Medical Board decide to choose option 2 then I feel that the conditions should apply to ALL medical Practitioners, not just a selective few who practice Integrative Medicine as I do not agree with a separate set of rules for one modality. I also believe that the Medical Board needs to accept that Integrative Medicine comprising of Complementary or Unconventional or Emerging Medicine as well as using conventional medicine and it needs to be recognised as a Speciality in order to allow increased Medicare rebates to help cover the increased costs of fulfilling the new regulations.

Kind regards,

[REDACTED]

## Medical Board Submission

1. Do you agree with the proposed term 'complementary and unconventional medicine and emerging treatments'?

If not, what term should be used and how should it be defined?

No! Why should an alternative to big pharma treatment be labelled "unconventional"? For many years now it has been referred to as an "alternative" to what you deem to be conventional because you have deemed conventional to be safe.

2. Do you agree with the proposed definition of complementary and unconventional medicine and emerging treatments – '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.'

If not, how should it be defined?

There again, you are using the term "conventional" because you believe it to be so. Many illnesses, particularly chronic illness cannot be helped by "conventional" medicine and in fact, in the case of opioids can cause more harm than good, especially when they lead to addiction. Which actually goes against the creed to "do not harm". Many of these difficult to treat illnesses can be helped quite successfully with an "integrative" approach if there is scientific evidence to validate the use of a treatment. Doctor's should have the freedom to "think outside the conventional box" when it comes to treating all persons. Just because a treatment doesn't fit into your box, that does not mean it should not be tried if there is evidence to back their diagnosis up.

3. Do you agree with the nature and extent of the issues identified in relation to medical practitioners who provide 'complementary and unconventional medicine and emerging treatments'?

I believe no doctor would consider "alternative" medicine if they didn't believe it would help, just as no doctor would withhold treatment with "conventional" medicine if they didn't believe it would help. The doctors that use this type of therapy generally spend more time getting to know their patient than most do with a 10 minute consult and a prescription pad. If the practitioner has a scientific reason to treat alternatively then they should have the freedom to do this. In most cases, these doctors are more knowledgeable than their 5 minute medicine counterparts... Why should the Medical Board or the TGA have the right to dictate how they choose to approach the therapy or treatment they wish to use?

4. Are there other concerns with the practice of 'complementary and unconventional medicine and emerging treatments' by medical practitioners that the Board has not identified?

No – if a doctor has a scientific reason to treat a patient then they should not be hindered in doing so.

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

All doctors should be held accountable regardless of what type of medicine they use to treat their patients.

6. Is there other evidence and data available that could help inform the Board's proposals?

My concern is that the Board only considers "conventional" medicine to be adequate and of use. I think it is more a failure on the Board's part to keep up with emerging scientific evidence that validates the use of integrative therapy. I am a sufferer of ME/CFS and have benefited greatly from the use of Low Dose Naltrexone in my disease. It has improved my level of functioning and has given me the chance to experience a better quality of life. Take for instance the benefit that children with Epilepsy are having with the use of Medicinal Cannabis, it has been a life changing treatment for many. Why is it so hard for patients suffering to access these drugs that clearly have a beneficial therapeutic effect? To ignore the scientific research and data on just these two drugs for example is tantamount to "doing harm".

7. Is the current regulation (i.e. the Board's *Good medical practice*) of medical practitioners who provide complementary and unconventional medicine and emerging treatments (option one) adequate to address the issues identified and protect patients?

YES. Option one is adequate. It is already incredibly difficult for people suffering especially with chronic health conditions who have exhausted every avenue of "conventional" medicine to find practitioners who are willing to educate themselves more in treating patients in an alternative way to 5 minute medicine. Please do not take away a doctors ability and willingness to "think outside the box" and go above and beyond to help the people most at need in our community. For me personally, my journey and experience seeing an integrative practitioner has been literally lifesaving. He gave me back HOPE for a better life...without that, people most in need and at a loss for options, desperately take their own life, when all avenues are lost to them.

Option 2 is limiting for patients such as myself with chronic health conditions. I for one would be far worse off if I were unable to choose freely an alternative to conventional medicine. All it has had to offer me is psychiatric meds for my debilitating condition, none of which are very useful. I believe most doctors want to do the right thing by their patients...so why limit and restrict them more? For too long Big pharma has had a free ride, not all the answers to life's questions can be found in a prescription pad. It's time we looked further afield for answers and by doing that it will lessen the overall financial burden to our community if we can get sick people active again.

8. Would guidelines for medical practitioners, issued by the Medical Board (option two) address the issues identified in this area of medicine?

NO! It only limits doctors to be confined within the claustrophobic walls of Big Pharma.

9. The Board seeks feedback on the draft guidelines (option two) – are there elements of the draft guidelines that should be amended? Is there additional guidance that should be included?

10. Are there other options for addressing the concerns that the Board has not identified?

YES. Listen to the practitioners and the people, you have already had to extend the time frame of this submission process. Please don't be close minded in your consideration of our voices and appeals for fairness.

11. Which option do you think best addresses the issues identified in relation to medical practitioners who provide complementary and unconventional medicine and emerging treatments?

☐ 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.

Option one is more suited to help the chronically ill, allow them options for better health care, there are other options to improving health than a prescription pad. Allow these doctors to continue practicing for the good of the chronically ill and for the good of the country.



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**From:** [REDACTED]  
**Sent:** Friday, 28 June 2019 7:02 PM  
**To:** medboardconsultation  
**Subject:** Regulation of Medical Practitioners

**Importance:** High

**Name:** [REDACTED]  
**Occupation:** Travel Industry

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 suffer from many illness like thyroid / hashimoto's which bring many debilitating symptoms and I have pyrrole blood disorder.

Conventional general practice has not been able to successfully treat my conditions and bring me any kind of satisfactory outcome. In most cases after following a conventional GP's advice it made me feel worse and my symptoms were more severe and I certainly have not experienced healing from any of my conditions under the advise of a standard GP.

When I consulted a integrative medical doctor they looked at all my symptoms and conditions and helped me understand what I need to do from lifestyle/ diet perspective. And were also able to help me gain more control of my health through supplements and complimentary therapies.

If I cannot see an integrative Doctor, I feel that my health would definitely deteriorate and have a continuing impact on my family, work and my general wellbeing.

Without integrative Doctors it would put such a huge burden on conventional GP's and hospitals, as there wouldn't be an avenue to heal or learn ways to manage symptoms effectively.

I appreciate you looking into this.

Kind Regards,

[REDACTED]

28/6/2019

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

**From:** [REDACTED]

**My main health problem has been my thyroid and ferritin levels**

**Prior to seeing Dr. [REDACTED] I was totally unaware of the poor levels and the potential problems. Since Dr. [REDACTED] investigation, I have seen my GP who organised for blood tests to be done at my request and the feedback was " Dr .... has revised your result dated 17/04/2019 and made the comment: Blood results are acceptable. No reply". I am no doctor however comparing the results with previous results and the reference level, it is clear to me that both of these functions are not functioning.**

**Going to Dr. [REDACTED] has totally opened my awareness to my body's behaviour and its status especially that I am 65 years of age when the importance of my body's function is paramount.**

**My son introduced my husband and myself to Dr. [REDACTED] some 5 years ago and his treatment. For me I have only seen improvement in the balance of my overall health / detect any disorders / etc.**

**Based on what I mentioned above the feedback from my GP whilst [REDACTED] [REDACTED] I will be seeking the assistance of an integrative health practitioner.**

**I am angry to think that I have to look beyond my preferred health practitioner based on a complaint by an unqualified person. I am disadvantaged here and the [REDACTED] has a domino effect on many many people.**

Submit, by email, directly to **The Medical Board of Australia**.  
The email address is [medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

**Important Note:**

The email needs to be titled

**“Consultation on complementary and unconventional medicine and emerging treatments.”**

NOTE: On the website <https://integrativemedicinefreedomofchoice.com>

**For those who would like the convenience there is a form set up on this site that can be completed, with an option to attach a document, so that when you click *submit* it will go directly to the Medical Board of Australia.**

**Always cc a copy to yourself.**

**You could send a copy to your local politician and to the Health Minister and Shadow Health Minister to ensure they are aware of this major proposal to limit health care choice in Australia.**

**You can also post the submission in by mail to:**

**Executive Officer,  
Medical Board of Australia,  
AHPRA,  
GPO Box 9958  
Melbourne VIC 3001**

Remember it is recommended to keep to an ideal maximum submission length of 2 pages. This will make for a powerful concise case history.

The focus of your submission should be the journey you have taken to improved health highlighting the positive impact from using an integrative medicine doctors.

The MBA proposal will have a ripple effect on all of our lives if nothing is done and it is allowed to succeed. Everyone will be negatively affected by the proposed changes of this consultation paper.

**Remember to pass this knowledge on to other persons and get them to ACT NOW!**

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**From:** [REDACTED]  
**Sent:** Sunday, 14 April 2019 10:04 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 freedom of choice in the type of medical care that I use to address my chronic health issues.

I have been suffering from Alopecia areata, a form of Autoimmune Disease.

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.

I have suffered with Alopecia for 4 years, in that time I have been offered anti depressants, heavy duty painkillers and steroid creams, all subsidised by my health care card, and/or the Australian health care system.

I received no or very little relief from the majority of these medicines and no change in my condition. Within 2 years of taking the newly emerging drug Naltrexone, my hair has finally begun to grow back. My muscle pain is very mild and my mood is much improved. My Doctor recommended extra physical activity, counsellor appointments, low dose Naltrexone treatments and natural hormones from a compounding chemist to aid the symptoms of menopause.

I am very happy with my treatment and elated that my hair may grow back after 4 years this is apparently very unlikely.

It would be extremely unfortunate if such clear relief was not available to the majority of Australians and at a fraction of the cost of treatment recommended by regular Apathic Doctors using highly subsidised pharmaceuticals.

Deeply concerned,

[REDACTED]

[REDACTED]

[REDACTED]

14 April 2019

## Medical Board Submission

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

I am gravely concerned that there is a growing transition away from complimentary medicine, to untried and mostly untested conventional medicine.

I am aghast that at medical school, treatment of ailments is only about symptoms and not cause, and this plays firmly into the hands of large pharma which profits from ill health.

Enough is enough. China is a great example of why alternate medicine should be complimentary with conventional, as the Chinese community has a completely opposing view to us of medicine. And still, they are a healthier race, and only suffer ill health increases when they are exposed to our lifestyle, foods and medicines.

In the latin phrase, *res ipsa locitur*, "the facts speak for themselves"

Prior to accessing complimentary medicine, I was very unwell, and had multiple ulcers.

As an Australian citizen I feel it is important that I have the freedom of choice in the type of medical care that I have access to, and us, to treat my health issues.


Conventional medicine does not have all the answers, never has, and never will, history has taught us this much.

I have seen my life maintain a very high level of lifestyle and fitness, whilst I maintain a very active work life balance. I attribute this to complimentary medicine.

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

Concerned,

Name: 

Signature: .....  .

Date: 24 June 2019

Occupation: CEO/Lawyer

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**From:** [REDACTED]  
**Sent:** Thursday, 4 April 2019 3:24 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments.  
**Attachments:** PPublic consultation on integrative medical practitioners

My first major concern is this "public consultation" has not been made very public, depriving people of an opportunity to respond.

As an Australian citizen I regard my freedom of choice in the type of medical care I chose to receive for my health issues as an absolute right.

Conventional medical doctors had been unsuccessful in treating my menopausal symptoms, which were quite severe, with their pharmaceuticals and had actually caused dangerous unwanted side-effects.

It was only after being treated by an integrative medical practitioner, who advised me on lifestyle changes, diet and supplements of vitamins and minerals, that I regained my enjoyment of life and no side effects.

If integrative practitioners are restricted in what they are able to prescribe, my health, and I am sure, the health of many people, will once again revert back to my previous state and impact on my health, my family and wellbeing.

I deserve to be allowed the right to continue in the informed choices I make in relation to my own medical treatments and do not understand why these are, possibly, being taken when so many

informed and intelligent Australians have successfully been treated by integrative medical practitioners.

Name: [REDACTED]

Signature:

Date:

## MEDICAL BOARD SUBMISSION

### Re: Public Consultation on Clearer Regulation of Medical Practitioners who Provide Complementary & Unconventional Medicine & Emerging Treatments

I'm terribly concerned, if not horrified, that my freedom of choice in the type of medical care I can access could be compromised and restricted as my current GP has completely revolutionised my health.

I am 51 years old but since my early teens, suffered from severe constipation, acne, brain fog and was 10kg overweight. I sought help from numerous GPs over the years for the above but was told to 'eat more fibre' and sent to a dermatologist to address my skin where I was prescribed a couple of different nasty medications which I took for years.

It wasn't until I was 40 I started seeing my current nutritional and environmental GP who turned my health completely around. He diagnosed that I was chronically hypothyroid, had a severe gluten and dairy intolerance and subsequently my gut was mess. Also, my husband and I leading up to this point, had been trying, unsuccessfully for a decade, to fall pregnant.

I learnt from him the importance of diet and that we are what we eat. I learnt my infertility was a result of my hypothyroidism, which was most likely caused by the gluten intolerance and my acne was caused by diet & gut, particularly dairy and sugar.

I saw significant changes in my health within a year of changing my diet and using good quality supplements and now 10 years on am slim, fitter and have more energy than I did in my 20s. My skin is clear (and often complimented on which I never dreamed would happen!), my thyroid is happy and I'm constipation free.

I never get colds or flus and my immunity is so strong I was recently able to fight off a severe tick bite without any intervention and am currently recovering from Ross River Fever which only resulted in acute symptoms for a couple of days. I was back running 5kms within a fortnight. I literally am a different person.

I was unable to have children, the most devastating consequence of my health journey, no thanks to conventional GPs and specialists, as sadly, the real help I got came too late.

I have virtually no respect for conventional GPs who do not treat the cause but offer only bandaid solutions in the form of drugs and I am mortified how my health will suffer if I can no longer access a doctor like my current one. It is beyond belief that you are considering the regressive reforms you are. Unbelievable.

You would do well to heed the founder of your profession: Let food be thy medicine and medicine be thy food. How wise he was!

Concerned, ~

[REDACTED]

(Dip T; C. Dec)

21 June 2019



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**From:** [REDACTED]  
**Sent:** Sunday, 16 June 2019 7:07 PM  
**To:** medboardconsultation  
**Subject:** 'Consultation on complementary and unconventional medicine and emerging treatments'

Dear Sir/Madam,

I write regarding 'Public consultation on complementary and unconventional medicine and emerging treatments', a topic of great interest to me due to my chronic health issues.

Over the past five years I have consulted several registered medical practitioners who either refer their patients to complementary and/or unconventional treatments or offer such services themselves. In all my dealings with such doctors I have had only the best experience possible, and their recommendations have resulted in considerable improvement of my conditions which have been determined to be "permanent, chronic and irreversible". Had I accepted and adhered to conventional treatments offered by the majority of doctors (which would have included surgery and large doses of conventional anti-inflammatories and painkillers), I would have developed a life-long dependency on conventional drugs, had serious side-effects (as described by several of my friends who undertook such treatments for similar conditions), and possibly ended up with permanent nerve damage on top of the existing conditions. It is largely owing to the complementary medicine approach by two doctors I consulted (out of 13) that I can now live a relatively normal life. The treatments they recommended included herbal medicines and supplements (including natural anti-inflammatories), acupuncture, psychological support for pain management, massage, chiropractic and applied kinesiology treatments, physiotherapy, and encouraged yoga and daily meditation, all of which combined to significantly improve my medical conditions without any deleterious side-effects or life-long dependency on conventional drugs.

In addition to this, I would like to make the following points regarding some of the key issues mentioned in the Medical Board of Australia proposal:

1. Conflict of interest: In my experience, this can occur also in cases of doctors and specialists who do not offer any complementary or unconventional treatments. For instance, I was offered a surgical treatment by a specialist who hoped I would undergo the proposed surgery in his own practice rather than within the public health care system (thus resulting in direct financial benefit to this doctor), which was justified by "a long waiting list" in public hospitals. In the end, by not following this specialist's advice at all, I was able to entirely resolve one of my conditions using unconventional methods suggested by an open-minded GP and avoided a potentially crippling surgery.
2. Prescription of "compounded products... that have been manufactured in bulk rather than to meet an individual's needs": Practitioners who offer or recommend unconventional treatments usually have a much more detailed understanding of their patients' conditions and their possible causes and effects of various therapies than the ones who stick only to the conventional Western medicine approach. The former are able to offer a much more personalised and individualised diagnoses and treatments to their patients than the latter.
3. Practitioners using "an identical treatment approach, including unconventional investigation and prescribing for most or all patients, and failing to make a proper diagnosis of each patient's specific condition." This actually commonly occurs in the medical practice of GPs who do not offer any alternative treatments, and is therefore an unfair criticism of doctors who endorse complementary and/or unconventional treatments.
4. Vulnerability of patients "at risk of exploitation and unnecessarily exposed to risk of harm". There have been cases of conventional medical practitioners who have abused their power

and position to take advantage of their patients (e.g. by sexual molestation and even rape). Practising unconventional methods is not a “prerequisite” for such breaches of trust and the Code of Ethics to occur. See also my comment under 1.

5. Inadequate consent: Again, I can say from my own experience that doctors who practice conventional medicine seem more likely to fail to fully disclose risks of proposed treatments or communicate any potential lack of benefit to their patients rather than the doctors who are open to alternative approaches. The former seem to feel “protected” by the established system which has been offering the same treatments to most patients over many years despite some of these treatments having serious side-effects or not being suited to individual needs.
6. Poor patient management: For one of my conditions I received three wrong referrals (to specialists who did not specialise in my condition) from a GP who insisted that I accept conventional treatments he offered without even having proper and full diagnoses of my compounded medical conditions. When I reported back to him that none of the three specialists he referred me to specialised in my specific conditions, he even failed to follow this up and correct his electronic database. Another conventional rehabilitation specialist at a public hospital refused to acknowledge the seriousness of my medical conditions and refer me for appropriate and necessary investigation, at the time when I was in most pain and particularly vulnerable. This was in sharp contrast to the two GPs who supported complementary and unconventional treatments and immediately referred me for necessary conventional medical diagnoses and then expertly designed appropriate alternative treatments.

I am concerned that the proposed Option 2 which would introduce more scrutiny of complementary/unconventional medicine practitioners may result in lack of options for patients such as myself who either prefer alternative treatments to conventional Western medicine or have no choice left in the selection of treatments that work for them where all options of conventional medicines and treatments have been exhausted, have had serious side-effects, and/or have nothing more to offer. While it is regrettable that some doctors may misuse their authority when offering alternative diagnostic or healing methods to their patients (especially if this is done for financial or other gain), I believe that they are in the minority and that most medical practitioners who offer complementary and/or unconventional medicines and treatments do so with their patients’ best interest at heart. The proposal states that: “The [Option 2] guidelines are expected to have a minimal regulatory impost.” This is not the case, as many medical professionals may feel intimidated and indirectly scrutinised regarding complementary and unconventional medicine which they now prescribe and/or offer, to the point where they may feel reluctant to prescribe them to their patients in the future.

I support Option 1 which would enable medical professionals to maintain their current status in relation to their practice of unconventional medical diagnoses and treatments.

I support Option 2 only in cases of cosmetic (e.g. anti-ageing, beautification) and new and emergin treatments due to their potential safety risks and side-effects (e.g. botox and other anti-ageing treatments which contain toxic and harmful ingredients of which the general public is usually not aware). Such unnecessary treatments (except in cases of disfigurement caused by accidents wher such treatments assist the patient in both physical recovery and re-gaining psychological reassurance and self-esteem) often place patients to undue risk, offer no health benefit, and functia as profit-making enterprises.

Thank you for considering my submission.

Kind regards,

[REDACTED]



Dear Dr Tonkins

I read with interest the article regarding the MBA's proposal to tighten regulations on nutritional supplements and natural therapies in the article on ABC news

I would suggest as the Chairperson of the MBA to begin by first cleaning up your registered Medical practitioners overprescribing of medications to the general public which has reached epidemic proportion.

I work at a GP practice and I see the carnage daily:

Older patients being overprescribed drugs with incorrect date of birth, Incorrect names, incorrect dosages.

My daughter was a victim of being overprescribed 100 antibiotics at one go for a "Strep" throat infection if it wasn't for the foresight of the chemist who alerted her that she did not need so many and saved the situation.

Patients in the Old age homes being kept like zombies being overprescribed drugs.

At the moment the medical profession in Australia is moving towards the American style of overprescribing. You go to the GP they send you for all unnecessary blood test, scans etc and the older patients are the worst hit as they are being given the run around. And yes because Medicare foots the bill the "Oldies" are being used as scapegoats. The oldies are called in for health assessment test \$ 200/- paid by Medicare, Diabetes test another \$ 200/- so why would you want anyone to stay healthy when the system is being milked and the medical profession is the CASH COW. And the general public are unaware of the situation.

There is a place for both alternative therapies and nutritional supplements to be used side by side with allopathic medicine.

I am sure you are aware that some of the alternative therapies have been handed down from ancient civilisation and do work. Why is our western society so riddled with cancer than the Eastern civilisation.

Most complimentary therapist have a duty of care and a high level of ethics in comparison to the medical practitioners, I am fully aware as I have partaken of both and can vouch for it. But at the end of the day a patient is responsible for their own decision and the consequences

Most of our foods these days are genetically modified and lack the correct nutrients required by our bodies, I am sure you are aware of the situation. IBS and all sorts of gluten related problems have skyrocketed. I am sure you would agree with me that some of us do require nutritional supplements like fish oil and calcium supplements.

At the end of the day it is a patient's choice as to the therapy they choose after they have made a full assessment of the situation and with the assistance of their GP. I do believe there are some patients that do not read the instructions and over prescribe themselves and for those few that do I think it is callous to put a blanket ban for the rest.

I would suggest putting some thought into this knee-jerk reaction especially coming from a senior member of the Medical Board like yourself.

Kind regards



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**From:** [REDACTED]  
**Sent:** Sunday, 14 April 2019 6:46 PM  
**To:** medboardconsultation  
**Subject:** Complementary & alternative medicine

TO WHOM IT MAY CONCERN

I suffer from a number of medical conditions which have been treated by conventional and integrative practitioners. The side effects of some of prescribed pharmaceuticals have been severe and in some cases created other complex issues unrelated to my original (conventional) diagnosis. The best results I have had have been those prescribed by my integrative medical doctor. I believe this is the best approach for me as I have experienced relief from my symptoms using a variety of approaches recommended by my doctor which include both conventional and integrative approaches including diet and carefully calibrated supplements.

I believe it is my right as an Australian citizen to choose the type of treatment which is best for me. If I'm unable to go to my integrative medical doctor, my health will be compromised. In the 21C this is unnecessary; this is an unacceptable outcome for my health and wellbeing.

Should you wish to discuss the particulars of my medical history, I am prepared to make all diagnoses, reports and treatments available to you for review.

Yours faithfully

[REDACTED]

Occupation: Director - English Language Centre, [REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, 25 March 2019 4:49 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments'

I am against further restrictions on complimentary and alternative supplements. If it wasn't for such treatments, and if I had to rely on mainstream prescription medicines I would be living from one side affect to another, alternating from prednisone to methotrexate to NSAIDs for my autoimmune conditions, with all the awful side effects. With supplements and low dose naltrexone (an emerging treatment) I am a fully functioning member of society, without deteriorating bones or gastric problems. I Without these "alternative" substances I would be in sad shape.

PLEASE do not restrict my carefully constructed treatment.

Thank you

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 24 May 2019 12:47 PM  
**To:** medboardconsultation  
**Subject:** Proposed revised guidelines on unconventional and emerging therapies

I am personally concerned by and oppose the revised guidelines for integrative/functional medicine.

Traditional medicine places heavy focus on treating symptoms which is an essential first step when patients are suffering. However when an individual wishes to treat the underlying cause of their symptoms, for example inflammation, traditional medicine leaves a vast gap. Traditional medicine's use of diet and nutrition plays a secondary role to treatment with drugs as the long term solution. Integrative or functional medicine looks at genetic, environmental, and lifestyle factors that can influence long-term health and complex chronic disease.

I personally, as well as many others I know within my work and personal circles, have benefited significantly from integrative medicine. Traditional medicine had been treating my inflammatory responses to dairy (gut and ENT) with drugs which resulted in no cure and multiple side effects. Integrative medicine fully resolved all inflammation and symptoms through dietary modifications. Without integrative medicine my health would be poor and I would be costing tax payers money through both treatments and subsidized medication. In many long term health presentations there is an underlying root cause resulting from genetics, diet, or lifestyle.

Please do not proceed with proposed guidelines that will cause harm to integrative medicine.

Regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 6 March 2019 8:08 PM  
**To:** medboardconsultation  
**Subject:** Medical Board Submission

Attn : Medical Board Submission's

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 **Chronic fatigue syndrome (CFS)**, also known as Myalgic Encephalitis (ME), is an illness that affects the nervous system.

It causes extreme **fatigue** that cannot be explained by any other medical condition.

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,

[REDACTED]



Date: 06/03/2019  
Occupation: IT Consultant



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**From:** [REDACTED]  
**Sent:** Wednesday, 26 June 2019 10:10 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments  
**Importance:** High

Dear Sir/Madam

I am a 60 year old male with severe arthritis My medical practitioner prescribed voltaren tablets over time my stomach became red raw with an enormous amount of pain.

I have been treated with complementary medicine for many years now to help me with my arthritis and many other alignments with great success and little to no side effects. Whenever I visit most GP'S they tell me it's all in the mind, complementary medicine's do not work. My body tells me if something is helping me or not. I thank God every morning I get out of bed to be relieved from my pain not completely but to a manageable degree which gives me increased mobility and helped me remain employed to provide for my family.

I believe you should leave the Complementary medical Practitioners/Doctors practise as they already do, as outlined in option 1 (**Do not introduce new regulations**) on page 2 of the proposal

It makes me cranky when I see some of these Doll bludgers who have nothing wrong with them loafing around. And here I am 60 year old diagnosed with severe arthritis and never missed a day's work and still have to provide for my family, thanks to God I have access to complementary medicine. Please do not take it away from us.

Yours Sincerely

[REDACTED]

[REDACTED]

28 March 2019

**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:

- Lyme Disease, contracted in Europe and confirmed by multiple blood tests inside and outside of Australia
- Hashimoto's Thyroiditis
- Mould toxicity
- Autism
- Pyroluria
- Multiple food intolerances

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

The treatment of Lyme disease is a controversial and emerging field. In my experience, many Australian medical doctors are guided by research that is over 10 years old. My symptoms are persistent and crippling. They affect my ability to earn an income, participate in social activities, or experience any joy in life.

In Australia I have been told that 'Chronic Lyme Disease does not exist'. I have blood work from several laboratories inside and outside of Australia, taken both before and after antibiotic treatment that say to the contrary.

Anyone with knowledge of the principles of empirical science will understand that we cannot prove that something does not exist. There will always be phenomena that we have not yet discovered or do not yet understand.

As a postgraduate, science-educated citizen of a democratic country who has accessed the latest research papers on Lyme Disease, I wish to exercise my right to choice. I currently choose an integrative medical doctor who reads the latest research, discusses the pros and cons of various treatments, and treats me accordingly. In addition, I have access to a university library and do my own research.

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 well being. I may need to drain my financial resources to seek treatment overseas in countries like the USA and in the UK, where I will access specialists that are experienced and up-to-date in the treatment of my health conditions.

In addition:

- Whilst I am sick, I cannot pay taxes or support my children to the degree that I wish. I cannot give them the kind of experiences that challenge them and expand their world view. I cannot be the kind of role model that I would like to be.
- Whilst I do not want my choices to be reduced, I would value a rating system for supplements. I do believe that supplements should contain enough active ingredient to be effective, and that the product should match the claims on the box.
- Any new regulations should apply to ALL medical practitioners, with the same onus of exhaustive exposition of all treatment options, research etc.
- Integrative Medicine, including complementary, unconventional or emerging medicine as well as conventional medicine, should be recognised as a speciality. Medicare rebates should be increased in recognition of the specialty status of integrative medicine and to help cover the increased costs of fulfilling the new regulations.

Yours faithfully,



Occupation: Web designer

I wish to express some opinions on the Medical Board of Australia's desire to impose greater regulations on doctors who practice integrated treatments including complementary and alternative medicines.

Complementary medicine as used by a trained practitioner, is not only safe and effective with fewer or no side effects and no deleterious results for patients, but also much cheaper than allopathic medicine. I am not saying it should replace allopathic medicine, which can be very effective very quickly, but rather that in many instances integrated medical care can be more effective. I would like you to know how my family has been fortunate to have had great help from this medicine when 'normal' medicine failed:

1. I was unable to stay awake and this impacted on my family and work. After months of testing, doctors told me that there was nothing wrong and I should simply keep up as normal a life as possible. I then attended a naturopath who worked out what my problem was and in one month I was well again, and the problem has not returned in over thirty years.
2. My daughter gained over 40 kilos in one year. Endocrinologists agreed that she had a severe hormonal imbalance but said that they could spend a lifetime of research without finding the actual cause and therefore could not offer treatment. In desperation I took her to a complementary medicine practitioner, who, using supplements and diet, helped her lose 35 kilos over the following 6 months.
3. I was diagnosed with a hypothyroid and diabetes but decided not to go with conventional treatment. Instead I used complementary medicine and both conditions were controlled. Unfortunately after some time life circumstances changed and precluded continued use. (Lack of money. Though natural therapies are much cheaper than allopathic, they are not government subsidised so they are much more expensive for the user.) However, following general treatments I was able to control the conditions for about eight years, when the conditions deteriorated. I now take conventional treatment which is extremely expensive but affordable because it is government subsidised. It is not as effective as the natural therapy and has long-term undesirable side effects.

I could give many more examples but this should suffice to explain why I think it would be wrong to impose heavier regulations on doctors who endeavour to give their patients a wholistic, effective, non-dangerous solution to their medical problems.

Doctors who practice integrated medicine help their patients while lowering the burden of costs to the community. They encourage patients to be pro-active in their care and to make efforts to maintain their health through good diet and living choices.

Complementary medicine works or it would not have such a wide following. It is older than now-conventional treatments and does not have a mortality rate. Many current medicines are based on natural medicine or consist of synthesized active ingredients in concentrated forms with the addition of traces of solvents used in the manufacturing processes and can be deleterious to patients.

It would be interesting to know how many “integrated medical doctors” are on the Board to give expert opinions on what these doctors are doing.

Obviously I would choose option 1. The time, effort and cost of putting together this consultation paper would have been better spent in lobbying to put complementary medicine on the PBS, cheaper for taxpayers, healthier for patients.

It seems to me that rather than imposing more regulations to make it more difficult for doctors to practice integrative medicine, it would be in the interests of society to encourage more doctors to train in and use integrative medicine in their day-to-day practises.



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**From:** [REDACTED]  
**Sent:** Saturday, 6 April 2019 11:04 AM  
**To:** medboardconsultation  
**Subject:** My Freedom of Choice in Medical care for Chronic health issues

## 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 :

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 well being.

My Anxiety level is high just reading about this and worries me what will happen.

Menopause is just one big thing that affects so many women in such a negative way, and the treatments available from usual doctors

either do not help, or are not available to some of us.

Please Please Please don't close down these options.. that have, and do help so many people, including myself.

Deeply Concerned,

[REDACTED],

[REDACTED]

Date:

\_\_\_\_ 06 \_\_\_\_ / \_\_\_\_ April \_\_\_\_ / \_\_\_\_ 2019 \_\_\_\_

Pensioner

*Sincerely,*

[REDACTED]

**From:** [REDACTED]  
**To:** [medboardconsultation](#)  
**Subject:** Patient Submission regarding regulation of integrative and complementary medical practitioners  
**Date:** Thursday, 20 June 2019 11:52:59 AM  
**Attachments:** [Making-a-Patient-submission.pdf](#)  
[Public Consultation letter.docx](#)

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To whom it may concern,

I would like to make a patient submission and choose option 1 with regards to Integrative and complementary medical practitioners.

\*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.

Make it Personal

Prior to seeking care from a Integrative and complementary medical practitioner my health was poor. I had dizzy spells, nausea and generally felt fatigued.

I had been advised I was looking at a lifetime of taking Thyroxin to correct my thyroid antibodies. By seeking appropriate care and guidance I have been able to change the way I approach life, including diet and supplements to ensure a healthy wellbeing.

As a result of great care, I demand the right to choose my preferred mode of medical care.

Please also see attached.

Warm Regards,

[REDACTED]



## **Public Consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments**

**To:** The Medical Board of Australia

**From:** [REDACTED]

**Telephone:** [REDACTED]

**E-mail:** [REDACTED]

**Date:** 20/06/2019

### **Consultation**

I, Cara Stewart, appreciate the opportunity to participate in providing comments on the Medical Board of Australia's recent public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments.

It is noteworthy the MBA has undertaken an open and transparent consultation with all stakeholders to allow a considered and impartial document to be produced. I support the MBA continuing with its current code of Good Medical Practice, rather than producing an additional guideline document as an outcome of this consultation.

#### ***Question 1 – Do you agree with the proposed term 'complementary and unconventional medicine and emerging treatments'? If not, what term should be used and how should it be defined?***

- Grouping the practice of integrative medicine (IM) with phrases 'unconventional medicine' and 'emerging treatments' implies that IM is fringe rather than an evidence-based and vital adjunct within the practice of healthcare.
- Grouping three disparate areas together in this proposal – complementary, unconventional and emerging is not scientific, and incorrectly aligns each area with the same degree of potential harm or risk.
- The inclusion of the umbrella term 'complementary medicine' in the proposed guidelines without an accepted definition presents a further problem. Internationally-recognised and nationally accepted definitions should be used in the proposed document being consulted on by the MBA. The definitions should be agreed to be government and key stakeholders from representative industry bodies such as the Therapeutic Goods Administration (TGA), Complementary Medicines Australia (CMA), the National Institute of Complementary Medicines (NICM) and the Australasian Integrative Medicine Association (AIMA). Current definitions include:

#### **Definition of complementary medicines by the Therapeutic Goods Administration (TGA)<sup>1</sup>**

*In Australia, medicinal products containing such ingredients as herbs, vitamins, minerals, nutritional supplements, homoeopathic and certain aromatherapy preparations are referred to as 'complementary medicines' and are regulated as medicines under the Therapeutic Goods Act 1989.*

## **Definition of traditional and complementary medicine by the World Health Organization (WHO)<sup>2</sup>**

### **Traditional medicine (TM):**

*Traditional medicine has a long history. It is the sum total of the knowledge, skill, and practices based on the theories, beliefs, and experiences indigenous to different cultures, whether explicable or not, used in the maintenance of health as well as in the prevention, diagnosis, improvement or treatment of physical and mental illness.*

### **Complementary medicine (CM):**

*The terms “complementary medicine” or “alternative medicine” refer to a broad set of healthcare practices that are not part of that country’s own tradition or conventional medicine and are not fully integrated into the dominant healthcare system. They are used interchangeably with traditional medicine in some countries.*

### **Traditional and complementary medicine (T&CM):**

*T&CM merges the terms TM and CM, encompassing products, practices and practitioners.*

## **Definition of Integrative Medicine by Australasian Integrative Medicine Association (AIMA).<sup>3</sup>**

*Integrative medicine is a philosophy of healthcare with a focus on individual patient care. It combines the best of conventional Western medicine with evidence-based complementary medicine and therapies.*

*Integrative Medicine reaffirms the importance of the relationship between practitioner and patient, focuses on the whole person, is informed by evidence, and makes use of all appropriate therapeutic approaches, health care professionals and disciplines to achieve optimal health and healing.*

*It takes into account the physical, psychological, social and spiritual wellbeing of the person with the aim of using the most appropriate, safe and evidence-based treatments available.*

- There are many definitions of “integrative” and “complementary” healthcare, but all involve bringing conventional and complementary approaches together in a coordinated way. These definitions should be considered to be harmonious with national and international terminology.

## **Question 2 – Do you agree with the proposed definition of ‘complementary and unconventional medicine and emerging treatments’?**

- These terms ‘unconventional medicine’, ‘inappropriate use’ and ‘emerging treatments’ are not adequately defined which creates ambiguity and uncertainty.
- The term ‘complementary medicine’ also includes access to traditional medicines which is defined as a basic human right in Australia and by the World Health Organization.
- The amalgamation of three disparate groups into a single definition incorrectly implies they have many commonalities, which they do not. The only apparent component of the definition that provides cohesion is that the MBA sees these practices as non-conventional. This makes the definition political and therefore not scientific as it revolves around the concept of what evidence based medicine is in this age of evidence-based practice.

- More than two thirds of the Australian population use complementary medicines as a part of their self-care,<sup>4</sup> and it's estimated that one third of general practitioners incorporate some aspects of complementary medicine within their medical practice, therefore it could be argued that this constitutes current conventional medicine. The MBA would need to define conventional medicine to ascertain if this political definition has validity. The lack of clarity on how to determine what is 'conventional' versus 'unconventional' can be misused by people with professional differences of opinion.

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

- The terminology used should be nationally and internationally accepted, and agreed to amongst various industry stakeholders as outlined in response to Question 1. This assists in adopting a standardised process that can be transferred across different states and territories of Australia as well as internationally. Such standardised terms provides ease of communication across different frontiers.

***Question 3 – Do you agree with the nature and the extent of the issues identified in relation to natural medicine practitioners who provide 'complementary and unconventional medicine and emerging treatments'?***

- There is no evidence produced in the discussion paper that quantifies risk or relative risk in practicing complementary medicines.

- Complementary medicines as defined in response to question 2, are regulated by the TGA and are low-risk under the therapeutic goods regulatory framework<sup>5</sup> and must be articulated separately from treatments or other alternative therapies for the purposes of this consultation.

- The reporting of Adverse Drug Responses (ADRs) via the Therapeutic Goods Administration shows that only 1% of ADRs are from complementary medicines, suggesting that the relative risk is low and does not warrant the proposed guidelines. These figures are reflective of similar patterns of adverse events reported in Singapore (considered by the TGA to be a comparable overseas regulator). According to a retrospective study of reported adverse events due to complementary health products between 2010 and 2016, only 0.6% were associated with complementary health products – with the remainder linked to chemical drugs, vaccines and biological drugs. This further reinforces the relative low risk of these forms of therapies.<sup>6</sup>

- The World Health Organization's Traditional Medicine Strategy 2014-2023 devotes attention to prioritising health services and systems including traditional and complementary medicine practices and practitioners.<sup>7</sup> Therefore the proposed guidelines could be perceived as being contradictory to the aims and objectives of the WHO strategy, violating the human rights of all Australians, particularly indigenous peoples.

***Question 5 – Are safeguards needed for patients who seek complementary and unconventional medicine and emerging treatments?***

- All aspects of the proposed guidelines are adequately covered through the existing "Good Medical Practice: A Code of Conduct for Doctors in Australia" as seen by the detailed analysis in Appendix 1,

performed by the Australasian Integrative Medicine Association (AIMA) and included in their letter to Dr Anne Tonkin on 20th March, 2019.

- The structure of the proposed guidelines which specifically divides the scope of intent into “guidance for all registered medical practitioners” and then “Guidance for registered medical practitioners who provide complementary and unconventional and emerging treatments’ creates a two-tiered divisive system which is open to being challenged, onerous, restrictive and anti-competitive. This may in turn, impact service availability, additional costs to the patient, and restriction of consumer choice.
- A review conducted by the Australasian Research Centre in Complementary and Integrative Medicine, based at the University of Technology Sydney, determined that two thirds of complementary medicine users don’t inform their healthcare provider about their use.<sup>8</sup> This was linked to the patient’s perception of the level of knowledge and acceptance by their healthcare provider, and to their fear of being judged. By enforcing an additional set of guidelines the implication is that these therapies are ‘unconventional’ which could serve to further perpetuate this consumer concern. This in turn, presents safety implications whereby the lack of disclosure could lead to unwanted side effects, nutrient/herb/drug interactions, or reduced treatment effectiveness. These are all risks that can be easily managed if the patient feels comfortable and is encouraged to share their use with all of their healthcare professionals. As the code highlights there are many ways to practice medicine in Australia, reflecting a linguistically and culturally diverse society of which the core tasks of medicine are caring for people who are unwell and seeking to keep people well.

***Question 6 – Is there other evidence or data that may help inform the Board’s proposals?***

There is additional concern that the proposed guidelines have not been developed in conformance with COAG principles for best practice regulation as there is no evidence presented in these guidelines on the ‘magnitude (scale and scope) of the problem’, there is no demonstration that the current guidelines are inadequate nor any cogent argument given as to the need for additional regulation. Also of concern is the Board’s attempt to pre-justify a preferred solution stating ‘the Board prefers Option 2’.

**Conclusion**

We support that the current regulation (i.e. the Board’s Good Medical Practice) of medical practitioners who provide complementary and unconventional medicines and emerging treatments (option 1) is adequate to address the issues identified and protect patients. The proposed guidelines are unnecessary and provide no added value in terms of patient safety or clarity of practice for doctors.

I appreciate the MBA consideration of the points I have raised in this document and look forward to a positive outcome where the final document represents the comments and concerns from all stakeholders including those shared here.

1. Therapeutic Goods Administration. An overview of the regulation of complementary medicines in Australia. Available from: <http://www.tga.gov.au/industry/cm-basics-regulation-overview.htm>
2. World Health Organization (WHO). WHO traditional medicine strategy: 2014-2023. Geneva, Switzerland 2013. Available from <http://www.who.int/medicines/areas/traditional/definitions/en/>
3. Australasian Integrative Medicine Association. What is Integrative Medicine? Available from <https://www.aima.net.au/what-is-integrative-medicine/>
4. NPS Medicinewise, NPA Annual Consumer Surveys: Findings about complementary medicine use, 2008, available at: <http://www.nps.org.au/about-us/what-we-do/our-research/complementary-medicines/npsconsumer-survey-cms-use-findings>
5. Therapeutic Goods Administration. An overview of the regulation of complementary medicines in Australia. Available from: <http://www.tga.gov.au/industry/cm-basics-regulation-overview.htm>
6. Xu Y, Dhavalkumar N, et al. Retrospective study of reported adverse events due to complementary health products in Singapore from 2010 to 2016. *Front Med (Lausanne)* 2018;5:167.
7. World Health Organisation (WHO). WHO traditional medicine strategy: 2014-2023. Geneva, Switzerland 2013. Available from [http://apps.who.int/iris/bitstream/10665/92455/1/9789241506090\\_eng.pdf](http://apps.who.int/iris/bitstream/10665/92455/1/9789241506090_eng.pdf)
8. Foley H, Steele A, Cramer H, Wardle J, and Adams J. Disclosure of complementary medicine use to medical providers: a systematic review and meta-analysis. *Scientific Reports*. 2019;9: 1573.

# PATIENT SUBMISSIONS

## Advice to patients about the MBA public consultation

### Make a submission

It is important that the MBA hear how vital integrating care is to patients. Patient submissions should focus on why access to complementary and integrative medicine is vital to your health/wellbeing.

### Make it Personal

Personal stories are powerful and memorable. You can:

**Explain** what your health was like before you found the integrative approach

**Outline** difficulties you had in getting appropriate care

**Describe** how an integrative approach has transformed your health/wellbeing

**Demand** the right to choose your preferred mode of medical care.

### Protect your doctor

Submissions should not include:

- Your doctor's name
- Specifics of treatments

### Choose Option 1

The MBA asks you to choose between keeping the status quo - Option 1 - and introducing the new guidelines - Option 2. Please clearly choose Option 1.

## MBA Public Consultation



If, like many patients, you are concerned that the introduction of a new set of guidelines for your doctor will compromise your ability to access the healthcare of your choice you can make a submission to the MBA.

The new guidelines look like a direct attack on doctors and patients who choose an integrative approach to their care. Should these guidelines be adopted they could impact on patient choice and safety particularly as they may fail to align with the Australian Commission on Quality and Safety in Health Care's *Patient Charter of Rights*.

In this era of championing patient-centred care and the right of the patient to co-design their treatment it is troubling that there seems to have been no consumer/patient input into these draft guidelines. Given that around 75% of Australians choose to integrate their health care this lack of patient input does not respect the patient and disregards the notion of patient choice.

Safety is a primary concern for AIMA and for all doctors. We believe that 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.

For more on the proposed guidelines visit:  
[www.medicalboard.gov.au/news/current-consultations](http://www.medicalboard.gov.au/news/current-consultations)

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**From:** [REDACTED]  
**Sent:** Monday, 1 July 2019 1:32 AM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

This is my submission in response to the Medical Board of Australia seeking feedback on consultation on complementary and unconventional medicine and emerging treatments. I am employed as an Environmental Maintainer by a local metropolitan council in [REDACTED], working in and maintaining coastal, wetland and natural bushland reserves in my local area.

In March 2017 whilst undertaking weed control amongst revegetation in a local wetland area, I sustained over 50 tick bites and removed 3 ticks which I took photographs of. I sought medical treatment from my local GP and had two days off work which was covered by Workers Compensation under my Employers Insurance Company. However, over the ensuing 10 months my health dramatically declined and through clinical assessment of my symptoms and blood test results from Arminlabs in Germany, I was diagnosed with Lyme disease. Given my ongoing ill health and diagnosis of Lyme disease, my original Workers Compensation was reopened. However, after acknowledging my diagnosis, the Insurance Company refused my workers compensation claim stating that Lyme disease is not recognised in Australia.

I am a patient under the care of a Lyme disease aware Doctor who prescribes antibiotic and complementary treatment. Since commencing my treatment in February 2018 there has been a marked improvement in my health and dramatic reduction in my symptoms. Whilst I am fortunate that I am still able to work full time, there are still days when I am too sick to go to work for which I am not paid. Most evenings and on weekends I rest up at home conserving my energy so that I am able to get through the following day/week at work. This has had a profound impact on my family and friends and my quality of life, but my treatment is expensive and I need to work to be able to afford my ongoing treatment.

The economic and social burden of Lyme disease to the Government is immense through family breakdowns, health care costs, loss of taxation revenue through less income, loss of superannuation through unpaid time off work and dependence on social security payments and social housing.

I am outraged that the Medical Board of Australia does not recognise Lyme disease and Lyme-like illness in Australia and it is because of this stance, that many doctors are unwilling to treat patients for Lyme for fear of punitive action from the relevant authorities. If doctors were taught how to recognise Lyme symptoms and referred patients to experienced practitioners, I would have been prescribed antibiotic treatment when I was first bitten by the ticks which would have cured me and stopped the *Borrelia* infection from spreading throughout my body.

I conclude that the Medical Board of Australia should stop the discrimination against Lyme disease patients and should discard option 2 in the discussion paper and continue with option 1 of the current guidelines.

Regards  
[REDACTED]

I am both a natural therapies provider and patient. Over the years I have had many adverse reactions to pharmaceutical medication, including allergies to both penicillin and sulphur-based drugs. I also suffered many auto-immune like conditions as a child, teenager and early adult. My weight was a constant struggle. After the birth of my first son my health deteriorated greatly. It had been a traumatic birth, resulting in an emergency caesarean after a very long and stilted labour. I had many drugs administered to me during this time. My body responded negatively, I experienced lumps on my lower legs and after many doctor's visits the diagnosis of Systemic Lupus was being discussed. My decision to follow my instincts and return to my natural health care practitioner was life-transforming. Over the next 12 plus years following this direction has seen all symptoms disappear (that happened within the first 12 months), I have lost 30kgs, at nearly 45 years old I am in the best physical and mental health of my life. I display no auto-immune like symptoms, I am running half-marathons, managing a successful business and managing the demands of a growing family, continue to study and follow my passions and have not required ANY pharmaceutical medication in over 5 years (this includes paracetamol). And the best thing that I know not many people in our community can claim - I am truly happy. My health gives me confidence and vitality and the ability to enjoy life to the fullest.

Over the past 3 years I have started educating myself down the path of functional and integrative medicine. Finally the science to back up what I knew to be true for my own life. This is why I am constantly amazed at the lack of proper dissemination of this information and the regular misinformation given to the general public. While ignorance may excuse the general public it deeply saddens me to confront the truth of this misinformation in the professional medical communities. Money and greed are driving a very clear agenda of removing people's basic rights to choose how to look after their own bodies. It will (as we are already seeing) have devastating effects on people's health and completely undermine the very useful acute medical care system that we do have in this country. Our health care system is clearly under stress and it is not designed to manage the chronic life-style driven health issues we are now seeing with all too much regularity. For Australia to continue to deny the evidence-based and clearly effective modalities in natural / functional and integrative medicine will have devastating effects on our community for the profit of big Pharma.

We are already seeing a divide between the health of those that follow the western medical approach and those that choose the integrative / natural approach. I saw this very clearly in my own health and will not have my right to choose my health care removed!



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**From:** [REDACTED]  
**Sent:** Tuesday, 26 March 2019 7:12 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complimentary and unconventional medicine and emerging treatments.

Hello,

I am writing in regards to hearing that Natural Medicine Doctors are being shut down or losing their right to practice.

My experience with Natural Medicine Doctors has been incredible. Where mainstream medicine has failed me (especially with chronic illness) & it almost always has... & I would say was the cause of my chronic illness experiences escalating, having access to natural medicine doctors has been a godsend & has put me back on the path to healing.

Whilst I know it's not in the best interest of pharmaceutical companies for people to heal & get their lives back, I know it is in the best interest of Humanity for people to heal & be healthy, & provided there is a Human Reading this I know that deep down you know this is true.

Natural Medicine is just that 'Natural' meaning it is natural to our bodies & it works. As I am sure you know it's been around for thousands of years with civilizations that's thrived. Herbal medicine, Natural Eating (Organic food), Natural Healing modalities of massage, sound therapy, & other forms of healing are just that 'Natural'.

I'm sure whoever is reading this Knows this, but let's be real, What do we want... happy & healthy humans & Children... or pharmaceuticals dividends?!

I know this could be irrelevant but I just want to say, come on, let's be humans & not robots. What you choose to do with this email does Matter, & I Hope you acknowledge the individual message from A real Human who is Really healing because of natural medicine.

Thank you,

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, 23 April 2019 8:56 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments.

To the Executive Officer of the Australian Medical Board,

My name is [REDACTED]. I am a 41 year old male living in Sydney.

I have been fighting with fatigue, poor memory recall, mental malaise, and varying degrees of depression since being in teens. It took me until my late 20s to realise that this was not normal and did not have to continue.

I had seen many doctors to try to work out why I was fighting these symptoms, and had no real progress with a recovery. The process of doing blood work and being told that the results are within the normal ranges would make many doctors leave it there and say that it's just the way I was, and there was nothing to help me. I believed this for many years.

In my mid thirties I began taking anti-depressants. This did have a positive effect on the depression, but not the general malaise and mental faculty difficulty that I was feeling. I was exercising regularly and eating a balanced diet, but not feeling well and energised.

When I began seeing an integrative practitioner, I continued with anti-depressants, and added vitamin and mineral supplements (made by a compounding pharmacy) prescribed by my new practitioner. I also underwent a gut cleanse and detox.

A few weeks into treatment I began to feel less fatigued and foggy. I found my memory was more reliable as well. I had more energy, motivation, and confidence. My family and friends began positively commenting on my newfound energy and vitality. In fact, all of my relationships improved. I became much more present and available for those around me, both mentally and physically.

My life has turned around since seeing an integrative practitioner. I was made aware of many different blood tests, stool tests and urine tests than I've ever heard of. The results of methodically working through these available tests meant that we found the missing treatments that a conventional doctor may not have been aware of, or if they were, had never suggested this course of action to me.

Through my experience, I can wholly endorse complementary and unconventional medicine, and emerging treatments. It is often the last port of call for patients, as conventional medicines have not been enough.

Thank you for your time.

Sincerely,

[REDACTED].

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**From:** [REDACTED]  
**Sent:** Saturday, 13 April 2019 4:23 PM  
**To:** medboardconsultation  
**Cc:** [REDACTED]  
**Subject:** Consultation on complementary and unconventional medicine and emerging

Medical Board Submission

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

As an 53 year old female 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:

Allergies and irritable bowel issues along with hormonal imbalances causing unhealthy symptoms leading into menopause

Conventional medical doctors have not been able to successfully treat my condition(s) and bring me to a satisfactory level of health. In fact they went so far as to say 'it is just part of getting older'

A quick snapshot –

6yrs ago out of the blue I developed a severe anaphylactic response to marsh fly bites after never being bothered before. When I consulted my GP at the time (I was 48) asking why would this happen now after never having that response previously. The reply was I kid you not was just getting older it happens. I was told to always have strong antihistamine on hand that is it. The same GP also said he could provide me with anti-depressants to ease the irritable bowel symptoms. Not once did they consider looking for the cause. It was only through the efforts of integrative medicine that we were able to identify why it was occurring and set about changing lifestyle habits that I can now be bitten and have no severe reaction except mild itchiness and redness. It was a 2 year journey to get to this result but one I am happy to have been led down. As it turned out I 'killed 2 birds with one stone' as it also corrected my bowel issues by highlighting nutritional deficiencies causing part of the problem. The integrative method treats the whole person, mind, body and spirit as stress was one of the influencing factors also. Through recommended practices by my integrative GP (that I went out of my way to sought out, it was a 4hr round trip from my home at the time), I was also able to (through natural not synthetic means) identify hormonal imbalance by paying for more appropriate hormonal testing than currently provided by Medicare to fine tune my hormones. I have maintained the changes adopted and am a healthy soon to be 54yo .

Pharmaceuticals and the use of conventional methods simply did not work but not only that, treating the cause was never raised only treating the symptom seemed to be important and this seems to me to be a waste of Medicare funds and resources. I went through the usual colonoscopy and endoscopy procedures and was told I have irritable bowel when I asked what they found to diagnose that the regular GP said nothing was found so that's why I have irritable bowel. I was very disillusioned with the Medicare system and sought out alternatives, firstly through my own research which then lead me to find an integrative doctor. 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. It was so refreshing to have a doctor willing to take the time to get to the bottom of my issues. Today my issues are all under control and I feel secure in the knowledge that this type of GP is available to assist should I or any of my family need it. Please do not take this option away there is too much good work happening, there is so much to be gained in all disciplines working together for better patient outcomes. If you are truly committed to the health of individuals this is the way forward.

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 as I age will deteriorate as will the impact it will have on those close to me.

Concerned,



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**From:** [REDACTED]  
**Sent:** Tuesday, 25 June 2019 12:31 PM  
**To:** medboardconsultation

Hey,

I would like to see the use of complementary medicine and normal medicine be used by doctors of their choice. Both kinds of medicines should be able to work together and help people.

We should be able to have a freedom of choice as to the kind of treatment we would like or need. There is nothing wrong in having a choice. Times have changed so much, where there was only medical doctors, now we have both, they should be able to work together and help one another.

I know a bit about choice as I went to a doctor about depression and I was put on medication with side effects. I have been on them for 10 years or more and every time I try to come off them I have a very hard time. If I had of gotten complementary I would not of have side affect and would be able to come off no issues.

Please think well, let them both work together letting people have freedom of choice.

Thank you for your time

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, 8 April 2019 1:16 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments

Good afternoon

I write with grave concern in relation to the Medical Board of Australia's move for greater regulation of the Complimentary or Unconventional or Emerging Medicine practitioners, clinics and pharmacies.

I currently reside in the [REDACTED] and consult with an integrative general practitioner (who also uses conventional practice) based in [REDACTED]. I value this field of medicine and am immensely happy with the practice and the quality of care delivered under its banner. I find this field's empirical approach to disease and illness testing, screening and management reassuring, balanced, methodical and highly successful.

After suffering from a number of chronic illnesses for around 20 years and being turned away by no less than seven conventional general practitioners and specialists, this practitioner has reversed three of my chronic illnesses, and is currently treating my other two chronic illnesses (one of which I'll need to manage for the rest of my life) with great success.

My integrative general practitioner discusses options for treatment, each treatment's relative merits and potential problems. This person always opts for the most conservative treatment route in the first instance, prescribing small doses and working up to optimal doses based on consultation around symptoms and empirical approaches to testing.

Prior to seeing this practitioner, I was unable to walk, drive or care for my daughter. Some days, I couldn't read or speak because my cognitive function was so impaired. I was down to nine foods I could safely eat without having a massive autoimmune reaction. This was hugely confronting for a career-minded, academic with undergraduate and postgraduate qualifications under my belt. All this because conventional practitioners weren't trained well enough to do their jobs, didn't listen to their patient, and didn't take a holistic nor empirical approach to treatment. Now, I am back in the workforce full time (read: and paying taxes 😊), can eat a wider range of foods, can drive my own car and care for my daughter without assistance.

My preferred choice of outcomes in this matter is option 1 – to maintain the status quo, allowing people whom the conventional medical system failed time and again – for decades – pursue lines of medical treatment that are indeed effective and have given them their lives back.

Should the Medical Board decide to choose Option 2 – for greater regulation – I implore you to modify the current proposal to

1. ensure that it applies to all medical practitioners with the same onus of exhaustive exposition of all treatment options, research and testing
2. That the Board accept that integrative medicine, utilising Complimentary 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.

Kind regards  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, 12 March 2019 4:02 PM  
**To:** medboardconsultation  
**Subject:** Please dont restrict doctors!

Hello,

My daughter was unwell for 3 years, and if it wasn't for the knowledge and wisdom of our physician, and her referral to a chiropractor/ kinesiologist, my daughter would still be suffering. We need alternative therapies. Allopathic medicine has its place, and i am so grateful for it, but please allow doctors to practice alternative therapies also, it helps so many!

In health and wellness,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, 30 June 2019 8:19 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments

To whom it may concern:

I am making a submission to the Public consultation on complementary and unconventional medicine and emerging treatments.

I have had issues with chronic fatigue since I was a child, after 2 malaria infections and a number of other parasites acquired through international travel my health was a mess. I had chronic fatigue and could barely function. I went to a number of local GPs who could offer me no help or treatment post-malaria and who offered no treatment for the other parasites. It was not until I consulted with an Integrative Practitioner that I regained my ability to work and to function normally. I have recovered from chronic fatigue and gone on to have a family. I don't think this would be possible without the help of an integrative practitioner. Therefore 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 want to be involved in my own and my family's care and this requires time in consultations and 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 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.
- Regards

[REDACTED]

Medical Board of Australia  
GPO Box 9958  
Melbourne VIC 3001



11<sup>th</sup> April 2019

I am strongly opposed to the intention of the Medical Board to implement tighter regulations and restrictions on integrative medical doctors/practitioners. Doctors who practice “complementary and unconventional medicine” are the only doctors that have been able to help me to live a normal and functional life with a chronic illness which I have lived with for 26 years. When I first became ill, I went to countless conventional doctors and specialists looking for answers as to why. After 3 years, I still had no diagnosis or explanation, no relief and I was given endless pharmaceutical drugs which only made my condition worsen. I even endured painful, unnecessary surgeries not to mention the emotional pain of being told I was faking my illness. However, integrative doctors offered me solutions and through nutritional and herbal supplementation and homeopathic remedies among others, my quality of life dramatically improved. I also improved further when I was diagnosed with multiple stealth chronic infections (Lyme-like illness and co-infections) and was given long-term antibiotic and anti-parasitic pharmaceuticals to treat them. After such treatment, very distressing and debilitating symptoms that I had lived with for more than 20 years disappeared. There are endless stories out there similar to mine. Australian citizens deserve to have the choice to receive treatment from these practitioners and to not have the choice is taking away our rights to effective healthcare.

Embracing complementary and unconventional medicine and encouraging all doctors to incorporate them into their practice (instead of the other way around) makes more sense, as there are many people like me, falling through the cracks of conventional medicine’s strict boundaries and flaws. It is likely it would reduce the government’s financial healthcare burden and would result in physically and emotionally healthier Australian citizens. That should be the Medical Board’s primary goal. Further restrictions will not achieve that goal and I am bitterly disappointed and outraged at the suggestion to do so.

Sincerely,

 BSc

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**From:** [REDACTED]  
**Sent:** Wednesday, 27 March 2019 10:51 AM  
**To:** medboardconsultation  
**Cc:** [REDACTED]  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

Submission to MBA Consultation document on complementary and unconventional medicine and emerging treatments.

My name is [REDACTED], I am a 53 year old female who suffered from severe depression for years. In seeing “normal” doctors I was constantly given more antidepressants and then found I was developing other health issues and was advised to go on the contraceptive pill and have a hysterectomy amongst other ill advice. I started developing severe skin rashes and was given cortisone creams – I had aches and pains all over and was severely unwell. I was advised in my 20’s by doctors and a psychiatrist that I had no alternative other than to be on severe antidepressants for the rest of my life.

I went to an integrative health practitioner who took different blood tests and put me on nutritionals and advised I changed my diet. I immediately started to feel better and as I felt better and better I went off all medication I found all my other issues disappeared as well. I have now been totally healed – for years and am constantly improving health wise. I have also seen a holistic dentist which has also helped significantly. My family and friends also note huge benefits and have all consulted the integrative health practitioner, especially 2 of my children who had similar issues and this has helped them enormously. Now my parents are also going to see her as well as friends. We are finding it is hard to get into see her as she is so busy.

The standard of care, time and support given by this integrative doctor is incredible. I feel blessed to have found her and cannot believe that the Medicine Board would consider restricting doctors who work this way, they should be encouraged and supported. I also find it amazing to see how much sicker people look in standard practices rather than integrative ones where they are actually healing.

Kind Regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, 29 April 2019 6:03 PM  
**To:** medboardconsultation  
**Subject:** Submission to MBA Consultation document on complementary and unconventional medicine and emerging treatments

My name is [REDACTED] I can be contacted at [REDACTED] My son [REDACTED] (now 17 yrs old) suffered a Traumatic Brain Injury in June 2016. He suffered significant injury to his right frontal lobe and diffused injuries throughout his brain including his temporal lobe, hippocampus and hypothalamus. [REDACTED] had to have a double craniotomy and cranioplasty. As a result of this surgery he now also suffers hydrocephalus and has a VP shunt.

He was in intensive care for 23 days and hospitalised at Sydney Children's for a total of 8 weeks. He had to re-learn to talk, walk, bath and eat by himself again through intensive speech therapy, occupational therapy and physiotherapy. As a result of his injury he suffered significant issues with memory, impulsivity, elevated moods, ability to remain focused, fatigue and overall executive function.

We intensively researched complimentary therapies and implemented to [REDACTED] diet supplementary vitamins and minerals to assist his recovery. He began a specialised training regime to assist his neural and motor functions, along with integrative physiotherapy. Determined to try anything to improve the quality of his life we were referred by a friend to Dr [REDACTED] in November 2016.

Dr [REDACTED] recommended several strategies and protocols for [REDACTED] to implement in his day to day life regarding diet, sleep and supplements. Within a week of starting these protocols, including diet adjustments and supplements, [REDACTED] switched back on. From being near unresponsive and fatigued with poor communication abilities he could look people in the eye and remember basic day to day activities, his memory and mood improved amongst other things.

Twelve months after [REDACTED] accident, [REDACTED] Neurosurgeon and the Brain Rehabilitation team expressed their amazement at how well he was recovering considering the significance of his injuries.

I can confidently say his improvement is directly related to Dr [REDACTED] protocols and strategies. Our first visit with Dr [REDACTED] identified [REDACTED] as pre-diabetic. This would never have been picked up by his traditional medical team, perhaps until it was too late. Dr [REDACTED] again adjusted his diet, sleep patterns and supplements to address this. It is something we are constantly monitoring with Dr [REDACTED] as the protocols with his Brain Rehabilitation team do not regularly monitor his health through blood tests.

Dr [REDACTED] understanding and knowledge of brain function has transformed [REDACTED] recovery. Dr [REDACTED] has always been particularly thorough and taken time to explain all facets of his protocols and the science behind them. We have been told by [REDACTED] traditional medical practitioners that we could expect to see improvement up to two years and then he would plateau. Following Dr [REDACTED] protocols [REDACTED] continues to improve in brain function area such as cognitive memory, flexibility, focus and executive function. Dr [REDACTED] has been monitoring his brain function improvement through CNS Vital Sign Reporting by measuring components of his brain function. [REDACTED] is still improving nearly three years after his accident. This measurement is not available with his traditional medical team.

We never expected to be living this life with our son. It has put incredible strain and stress on our immediate and extended family. [REDACTED] suffered significant social and friendship losses as a result of his accident. The continued improvement for [REDACTED] is now allowing him to function at some normal level with his peers. My husband and I live in the hope that [REDACTED] will be able to live independently one day. We feel the lifelong strategies and protocols offered to [REDACTED] under Dr [REDACTED] will help him achieve this.

Our observations from living in the hospital system, seeing children with injury or disease affecting brain function and living with our own brain injured child, have led us to firmly believe that [REDACTED] is in a much better position following Dr [REDACTED] protocols than he would be without. It is our choice to use integrative complementary

medicine for our son's mental health and physical well being. Traditional Medicine can no longer provide any alternative options for [REDACTED] ongoing recovery. He would truly be disadvantaged if this option was no longer available to him.

I thank you for your consideration.

Kind Regards

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 10 April 2019 5:40 PM  
**To:** medboardconsultation  
**Subject:** Lyme Disease

Executive Officer  
Medical – AHPRA  
GPO Box 9958  
Melbourne Vic 3001

RE: PUBLIC CONSULTATION ON COMPLIMENTARY MEDICINE AND EMERGING TREATMENTS.

To whom it may concerns.

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 than 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.

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. 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 Family and friends who use Complementary, Unconventional and Emerging Medicine and I highly value its availability and I am very happy with its practice. Treating doctors already provide 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.

The suggestion of strengthened guidelines is far too controlled, an attack on my human right to seek any treatment I choose to use with my chosen health professional. 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 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 expectations is that we as Australians should be able to attain the treatment of our choice, here at home.

I have a Niece with Lyme Disease and it is very hard to watch her loosing weight, having seizures and ( as well as being a Nurse and helping people yet she cant get help from the Medical Board.) trying to be a mum and bring up a family of as well. It breaks my heart to think she can not get the help she needs because of Arrogance and stupidity.

Yours Sincerely

[REDACTED]  
10<sup>th</sup> April 2019

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**From:** [REDACTED]  
**Sent:** Thursday, 27 June 2019 4:32 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 Conventional medicine provided no answers as to why my son was sick and 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 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 Chair has said this publicly.

Questions about how effective Complementary Medicine and Integrative Medicine is should be a decision left to me.

Yours Sincerely

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, 9 April 2019 9:17 PM  
**To:** medboardconsultation; [REDACTED]  
**Subject:** Medical Board Submission

**Dear Sir/Madam**

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

As an Australian born 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 am female, 71 years old, having had breast cancer 3 years ago which involved 2 surgeries and 30 radiation treatments. Since then I have suffered various health and medical problems the worst of which is very severe vaginal atrophy which causes intense lower abdominal pain 24 hrs a day, and the painful dryness. This is one of those never spoken of medical issues that plague women.

This was diagnosed after many tests, and surgical procedure by a gynecologist. He then put me on a trial of a product Strata RXT usually used for radiation dermatitis, for many months, but with no good effect. His trial ended.

I was then prescribed Ovestin Cream by my breast surgeon but I had very severe pain & also in the veins of my inner thighs, so had to stop using it. She then prescribed Vagifem Low and I had the same effect. She recommended Mona Lisa Touch treatments a number of times but as I told her, at \$600 per treatment x at least 3 maybe 4 treatments was well out of my Age Pension payment range.

I also was prescribed DHEA in troche form, but after 2 days I had a reaction in my mouth & lips that the pharmacist said I was allergic to it. So that was stopped.

Finally I was so desperate last year that I borrowed funds from my son and had 3 Mona Lisa treatments by a different gynecologist, that worked for 2 months then the pain came back. So I had another treatment which only lasted another 2 months. I do have to top private health insurance but this is not covered and also not by Medicare.

Note: The first gynecologist also said 'there's a lot of misinformation about HRT out there', and he prescribed HRT but was in tablet form which I didnt want to take after advice at the [REDACTED].

Last week following my annual mammogram & ultrasound my breast surgeon told me that there are now discussions around the medical profession that Mona Lisa treatments should not be given!! I have spent huge amounts of money and time, wasted energy, long painful stressful times with nothing conventional working.

The only avenue left for me was to go to my GP who prescribes compound HRT in troche form and I have been taking that now for several months with good effect.



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

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 lifestyle, my relationship, and my wellbeing.

I am very concerned for my future.

Thank You

[REDACTED]

[REDACTED]

[REDACTED]


As an Australian Citizen I feel it is my right to have freedom of choice regarding the type of medical treatment I can choose to address my health issues. For 52 years I suffered as an undiagnosed coeliac due to the failure of conventional doctors to correctly diagnose my symptoms and as a result I incurred Hashimoto's disease and had miscarriages and stillborn babies as well as many other problems.

Main stream doctors have even now been unable to treat my health issues successfully and bring me to a place where I can enjoy some quality of life. For many years pharmaceutical and conventional methods failed and my health continued to deteriorate and it was not until I became desperate enough to pursue unconventional medicine that my health improved and I began to see the light at the end of the tunnel.

I would like to emphasise that it was not until I found an integrative doctor who included lifestyle changes, diet and supplements of quality vitamins and minerals that my conditions began to improve.

If I cannot continue to see an integrative doctor because such doctor is restricted in what he is able to prescribe for me I know my health will again deteriorate and continue to impact my family and my wellbeing. Do you fully comprehend the seriousness of these proposed restriction you are contemplating imposing will have on so many people who are being helped by the doctors you are planning to shut down by such narrow minded attitudes and I wonder how much influence the pharmaceutical companies are having on this proposal.

Australia is a free country and to enjoy those freedoms I don't think any Medical Board has the right to restrict my choice of doctor or means of enjoying quality of life including good health.



14/3/19

Australian Health Practitioner Regulation Agency  
[medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

16<sup>th</sup> April, 2019

To Whom It May Concern,

I am writing this submission regarding the Medical Board of Australia having released a consultation paper in February that aims to redefine what is safe medical practise in Australia. The paper is responding to what it views as emerging and unconventional medicine and implies such dangers apply to all complimentary medicine.

My wife and I feel that this is a personal attack on our choices of medical treatment which pharmaceutical drugs cannot address. My wife was prescribed statins for her high cholesterol which after a short period, created so much pain that she could not take it anymore and also did not lower her blood pressure. In consultation with our medical practitioner, she advised her to try Bergamot. After taking Bergamot for a number of weeks we were surprised that her cholesterol readings started to drop and has worked effectively ever since.

My personal experience is with arthritic knees. I went to see an orthopaedic surgeon to see if an arthroscope would relieve my symptoms. He suggested to me that a knee replacement was imminent and that they do not give anyone over 60 an arthroscope anymore because of a buildup of arthritis at that age. I was not happy with that prognosis so I approached my GP to seek an alternative view. Her suggestion was to try Prolotherapy which I have since done with remarkable results. I have since had it done to my back and neck, again with remarkable results. I no longer have to take such a large amount of pain management.

I feel like this is an attack perpetrated by the pharmaceutical industry to limit the amount of options outside of the products they produce (which more often than not dull the pain and cure nothing). A great example of their overreach is medical cannabis. It has been proven extremely effective on patients which do not respond to pharmaceutical medicine and yet the government keeps dragging its heels due to the people lobbying government on behalf of large pharmaceutical interests.

In the past if ever I had flu like symptoms, my best option was to take Codral cold and flu tablets. This was always effective for me in clearing the symptoms before they became a full blown flu. In the last 18 months, they have been removed from shelves (because they were too effective) and replaced with a totally useless product which now has no pseudoephedrine in it which was effective at eliminating flu symptoms.

I feel that if the Medical Board of Australia are left unchecked, I will have no effective treatment for my wife or myself in our elderly years because of a clandestine attempt by the Medical Board of Australia to undermine the effective use of complimentary medicine and the standover tactics that threaten our most effective medical practitioners.

Yours sincerely,

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

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**From:** [REDACTED]  
**Sent:** Tuesday, 9 April 2019 10:34 AM  
**To:** medboardconsultation

This email is to voice my opposition to further changes or additions to the existing code of conduct 2014. I was sick for many years before coming across my current intergrative medicine practitioner. Her holistic approach and blend of western and eastern medicine is the key to my current health and vitality. Through my healing process I have learnt to self manage my health using diet and supplementation and balanced western medicine when necessary. Treating the root cause of my disease and imbalance - rather than taking a pill for life only to mask or bandaid the ailment. This has had a positive impact on my family, work colleagues and community. Sharing wisdom on the holistic approach to health - giving people the ability to take the fundamental steps to manage their own health has a domino affect on everyone they are surrounded by. Without access to these intergrative and holistic practitioners - I believe it will not only have a negative effect on individuals but communities and society at large. Kind Regards [REDACTED].

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**From:** [REDACTED]  
**Sent:** Saturday, 29 June 2019 10:56 AM  
**To:** medboardconsultation  
**Subject:** Medical Board Submission

Hi,

Regarding the public consultation on clearer regulation of doctors and/or medical practitioners who provide complementary medicine

I believe that it's very important for me to have the freedom of choice in the type of medical care that I use to deal with my health issues.

My health issues include many food allergies since childhood that have wreaked havoc in my life.

Western allopathic medicine has not helped me at all.

I realise now that conventional medical doctors do not study nutrition and that they are only trained to treat sickness, not to promote health.

Pharmaceutical drugs have not helped at all and usually come with nasty side effects, wasting Medicare funds and resources.

Only since I have been getting treatment from a holistic medical doctor that my condition has improved, by implementing an improved diet, as well as supplements, vitamins and minerals specific to me.

If I can't see my holistic doctor then I think that my health may deteriorate, which would again result in more Medicare funds and resources being wasted.

I don't understand why you would want that to happen.

Wouldn't it be better for everyone to be healthy and happy?

My directive to you is to let holistic/integrative doctors do their thing free of harassment.

They are doing a great job in improving mine and other people's health.

That's what I want for everyone.

I wish that all doctors were holistic and integrative in their thinking and treatment of their patients.

Thanks

[REDACTED], of [REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, 11 March 2019 8:07 AM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments - a cancer survivor's story

To whom it may concern,

I write to you today to beg you do not over regulate the natural therapies industry. In fact I beg you to make access to natural therapists and in particular integrative medicine easier for Australians. Indeed natural therapies should be applicable for health insurance rebates.

I abhor seeing the argument against "alternative" (hate that word) medicine as "non evidence based," I am a breast cancer survivor who chose integrative medicine against mainstream medicine 12 years ago, and stand by my decision as the best and bravest thing I have ever done. Not once has anyone in mainstream medicine asked me to be part of a research study into the evidence of natural therapies working, despite the fact I'm living, breathing proof. I'm not sure how you can have evidence based research when the mainstream medical industry closes its eyes and ears to it.

Here is my story:

In 2006, at aged 36 and with a 2 year old son, I was diagnosed with invasive breast cancer. It hadn't spread but was an aggressive form.

I had surgery and radiotherapy. However I declined the chemotherapy which I was advised to take. At the time my immune system was at rock bottom. The thought of poisonous chemicals being thrown at my immune system to destroy it further made absolutely no sense to me, so I searched for a better option for my health.

Fortunately my search led me to integrative medicine which literally saved my life. I attended an amazing clinic in [REDACTED], Sydney and was put on a regime of immune boosting natural supplements. More importantly I was given Vitamin C by IV drips over a period of 3 months. Fortunately I had the finances behind me to help with my treatment. I feel such sadness for those that don't.

Within a couple of months my immune system was restored and my fitness, strength and overall physical health has been better in the last 12 years than in any other period of my life. I still take natural supplements and continue to choose natural therapies if I do fall ill.

One interesting twist in my story is that my breast surgeon asked me at a recent checkup what I do to stay healthy. He wanted to share this information with his other patients. What a tragedy that the information and treatment isn't readily available for his other patients.

I am an advocate for integrative medicine and utterly in fear of the control the pharmaceutical industry has over this government and the health of its citizens.

I would be more than delighted to provide more information face to face and be part of any panel of previously chronically ill patients, who have been cured in the natural health world, to tell their story to the media, government committees and so on.

This is a subject I am very passionate about. Integrative medicine not just saved my life, it has kept me healthy for 12 years, and continues to do so,

Incidentally, just a couple of weeks ago I had a terrible headache. I knew if I went to a GP they'd send me for an MRI no questions asked. Instead I saw a naturopath in my local pharmacy (free of charge) and she

diagnosed a sinus infection, and prescribed garlic tablets. My headaches went within days. That's a fact and evidence based. Need I say more??

I do hope you take my story, and the story of so many others in a similar position to mine, on board in your determinations. If you would like any further information please do not hesitate to contact me.

Kind regards

[REDACTED]

[REDACTED]



To Whom it May Concern

I am writing in support of the existing regulatory processes and guidelines that medical practitioners who provide complementary and emerging treatments work within.

**I do not see any need to place further restrictions on these practitioners.**

As one who has lived with debilitating Chronic Fatigue Syndrome (CFS) for twenty five years, and having had to cease fulltime employment at age 50 due to my symptoms, I rely more and more on complementary and integrative medical practices, along with emerging treatments, to deal with my myriad symptoms. Prior to my diagnosis of CFS in the year 2000, I had visited many mainstream General Practitioners and had tried numerous conventional medical interventions, with little to no success. Hence, I turned to other modalities to deal with my rapidly deteriorating health issues.

Complementary and integrative medicine has helped me greatly, largely by stabilising and in many cases, diminishing inflammation, pain, brain-fog, fatigue, melancholy, emotional disturbances, unrefreshed sleep, while promoting feelings of well-being. Without these modalities, I shudder to think what my life would be like!

Accordingly, I have used, or continue to use, the following treatments:

- Vitamin B-Complex, Vitamin B12, Vitamin C, Magnesium, Pyrrolquinilone quinone (PQQ), Coenzyme Q10/Ubiquinol, N-Acetyl Cysteine (NAC), Ox Bile (for digestion), Turmeric/Circumin, probiotics.
- Compounded supplements include: Palmitoylethanolamide (PEA), Low Dose Naltrexone (LDN), A "Poly Pill" containing Zinc, Selenium, Molybdenum, Silica, Copper, Manganese, Chromium, Pyridoxal – 5 – Phosphate (P5P), Dehydroepiandrosterone (DHEA).
- Intravenous VitaminC and Vitamin B12 have also been utilised.
- Advice on nutrition, lifestyle changes, healing modalities such as meditation and acupuncture, along with friendship and collegiality, have been an integral part of my visits to Complementary and Integrative practitioners. Their support has been vital in my coping with the many ongoing health challenges that CFS has brought to me.

Again, my health would rapidly deteriorate, if I was denied access to Complementary and Integrative medical treatments. I am deeply troubled considering such things, as my life would become unbearable without these. Moreover, it should be my choice as to what medical treatments I choose, not some distant regulatory body. This particularly, if I reside in a liberal-democratic nation, as Australia claims to be.

Consequently, I reiterate, the current regulation with the Medical Board is adequate to address any issues that may arise with a Complementary and Integrative Medical Doctor.

Yours sincerely

 PhD

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**From:** [REDACTED]  
**Sent:** Saturday, 15 June 2019 2:49 PM  
**To:** medboardconsultation  
**Subject:** Possible severe regulation of integrative medicine

Greetings

I am what my doctor calls "an outlier" . I have a bone marrow problem which doctors told me would result in my death within three years. That was 20 years ago this year and I am still alive and well. I believe that this is because I did not have the "regular" recommended treatment of a bone marrow transplant, but instead found an integrative medicine doctor who has been looking at other less drastic treatments, such as supplements, mindfulness and meditation. I have also a haematologist who is investigating the role of food absorption, vitamin deficiencies and mineral depletion in my case.

I am most grateful to them for their interest in my whole health and bothering to take the time and trouble to look behind the obvious symptoms.

I am asking that you do not impose restrictions on this type of medicine, but allow those doctors who are interested in this branch of medicine to continue to help those of us who seek their help.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 26 June 2019 11:14 AM  
**To:** medboardconsultation  
**Subject:** Public Consultation on complementary and unconventional medicine and emerging treatments

## **SUBMISSION**

I spent many years trying to solve my health problems with the “traditional” members of the medical profession.

Unfortunately, the problems were never solved, always being put down as psychological, with treatments that caused more problems.

I was very fortunate to be able to access an Integrative Medical Practitioner 30 years ago.

At that time my serious health issues were discussed, appraised, tests completed and a diagnosis made.

I had been exposed to highly toxic chemicals, primarily DDT, over a long period of time.

I was offered treatment, support and care by the Integrative Medical Practitioner, which I still receive to this day.

If the Medical Board of Australia insists on the new regulations, my access to the most suitable medical care for me will be taken away.

**I WANT AND NEED TO HAVE THE FREEDOM OF CHOICE OF THE MEDICAL PRACTITIONER WHO WILL BEST LOOK AFTER MY HEALTH AND WELLBEING**

[REDACTED]

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**From:**  
**Sent:**  
**To:**

[REDACTED]  
Thursday, 27 June 2019 5:53 PM  
medboardconsultation

Dear Medical Board

- 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 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 severely harmed by conventional medical treatment, and needed to find other options, hospitals weren't able to help me either and only traumatised me with their inadequate knowledge, dismissal and mistreatment.
  - 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.
- My integrative doctor was ONLY doctor who was able to diagnose CIRS - one of the conditions I suffer from as a result of living in waterdamage building - that gave me neurotoxicity. This was a lifesaver diagnosis as I got so disabled I was barely able to walk or talk. A national enquiry into biotoxin related illness through House of Representatives was looked into last year.
- Compounding medicines that actually make a difference to me are prescribed by integrative doctors.
- To shut down integrative practices is equivalent to just letting patients like me slowly die unknown. Prior to illness, I was studying a double degree and working part time at 19yo. Current conventional medicine has failed me over a decade. I want my life back! I want to be productive! I want to contribute to society. Patients who see these doctors want to get well and live because they been failed elsewhere and usually tried

countless treatments. We keep falling through medical gaps, driven beyond poverty but still have a drive to get well. Don't kill our hope in being alive when we are already struggling to survive, when these doctors have knowledge and treatments that are working where conventional medicine (cheaper options don't do anything).

- Kind regards,
- [REDACTED]
- 

P.S I am angry that medical system has already failed me, isolated me and provided no answers and now you are considering cutting off something that is almost equivalent to oxygen tank for me. It really breaks my heart this is happening in Australia. Apologies for emotional email.

4 April 2019



Medical Board of Australia  
GPO Box 9958  
Melbourne  
Victoria 3001

Dear Sir or Madam

**Public Consultation – Submission regarding Complementary Medicine**

Further to your call for submissions regarding the use of complementary medicine. I have a child who has autism spectrum disorder, specifically Asperger's syndrome. He has historically suffered from considerable anxiety, OCD issues, attention deficit and concentration problems in the classroom; with all of these issues culminating in significant behavioural problems in both the home and school environments.

Since 2010, he has been under the care of a paediatrician, in conjunction with his general practitioner. The paediatrician has prescribed him pharmaceutical medicine, with the general practitioner prescribing him nutritional supplements. Both doctors have worked in tandem, with the nutritional supplements not being an alternative to pharmacological therapy, rather a complement to them. Both therapies have worked together and I see that over time the nutritional medicines have aided and assisted the pharmaceutical approach.

When you have a child on the autism spectrum you are tempted to try anything. I am by my very nature a sceptical person, with a strong belief in the rational and possible, rather than looking for the next fad or miracle cure. The general practitioner's cautious approach has been faithful to the doctor's old adage of, first do no harm. It has been based on first principles and science. It is measured, conservative and evidence based. The medical care is based on the theories of the biochemistry of the brain, measured through blood and urine tests. It is not some magic pudding, based on wellness or magic potions. It has been centred on regular appointments, regular blood tests and periodic feedback from his school based on objective and measurable criteria.

When I look back to how my son was five years ago to today, I see significant improvements. We will never know if this would have happened anyway, as life isn't a controlled science experiment. However, I believe that the use of nutritional supplements has significantly benefited my child. Our son will always be different and have challenges. However today he shows no OCD behaviour, significantly reduced anxiety, improved concentration in the classroom and better academic results. He still has some resilience issues and has challenges managing interpersonal relationships, but overall he is a far more settled, happy and competent teenager.

I am sincerely grateful and appreciative of the work done by his general practitioner in the field of nutritional medicine and would be profoundly disappointed if we could not continue with this line of medical treatment.

Yours faithfully


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**From:** [REDACTED]  
**Sent:** Monday, 13 May 2019 8:10 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments

I have read the public discussion paper and would like to comment on the regulation of medical practitioners who provide complementary treatments.

I am both a Registered Nurse and a patient with a chronic disease.

As a nurse I am very familiar with the scope and practice of conventional medicine, for which I have the utmost respect. I recognise that it has been and still is essential in saving lives and managing disease to improve the quality of patient's lives, but I also recognise that it can have severe limitations.

As a patient with a chronic disease I am grateful that conventional medicine did help to manage some of the symptoms of the Hashimotos Thyroiditis that I have had for 9 years, but I am also very frustrated by it's limitations in understanding and managing this condition.

Prior to having Hashimotos, I was a very active wife, mother, employee and business owner. I played netball & tennis and had competed in Triathlons & long distance running.

At the worst points in this disease process, I have struggled to function on a day to day basis. Everything felt hard. I was so tired it was difficult to get out of bed each day & this affected my ability to look after my young children, manage our household and hold down employment. I had constant aching in my joints and muscles, I had chest infection after chest infection and was unable to exercise due to severe breathlessness. I had tightness in my chest always. I had sinusitis. I had bowel infections which caused me to lose weight that I could not afford to lose. I had what can only be described as brain fog (difficulty thinking, poor memory etc). I felt depressed & was exceptionally emotional, and my libido was affected. I was MISERABLE, and it dramatically affected my family as well.

At this time conventional medicine told me the only treatment available was Thyroxine (synthetic T4 hormone replacement) and that there was no treatment for the autoimmune cause of my under active thyroid. As you must be able to understand, this was very frustrating. I was not even 40 years old and carrying out normal, every tasks was impossible some days.

The thyroxine did help to an extent but it did not address many of the ongoing symptoms that I still had, and in desperation, I began to do my own research as no-one within conventional medicine seemed to be able to offer me any hope



or any practical tools for managing this dreadful condition, which was so dramatically impacting my life.

The short version of what followed is that I changed my diet in an attempt to heal my gut as I believed I had a leaky gut. I consulted a number of doctors and also a Naturopath with an interest in thyroid issues. I discussed other options for thyroid hormone replacement, and also the ongoing hormonal issues I had been having for around 30 years but not found any answer to from conventional doctors.

My bloods showed that although my T4 was within "normal" limits, my T3 was quite low. This is not routinely tested by conventional doctors. Saliva testing showed severe oestrogen dominance and very low progesterone and testosterone as well as issues with my adrenal glands, none of which had been picked up in blood hormone testing by Gp's over many years.

From there decided that I would like to try Natural Desiccated Thyroid Gland as it would give me additional thyroid hormones and not just the T4 provided by Thyroxine. I took some naturopathic formulations and also more recently started to take Low Dose Naltexone in an attempt to manage the inflammatory component of Hashimotos.

The changed diet, starting the NDT & naturopathic formulations & adding LDN has **revolutionised** my health.

Now, 9 years into the Hashimotos journey, life can still be tricky, but I can get out of bed in the mornings, I am not exhausted ALL of the time, I am able to exercise everyday including running, playing tennis & gym work. I no longer have aching joints and muscles constantly, I have not used a single puff of inhaler in 7 years (asthmatic since I was in my teens), nor have I had a single chest infection requiring antibiotics and steroid medications. Overall I am doing pretty well and although a small proportion of that can be attributed to conventional medicine, the majority of my improvement can be attributed to thinking outside the box with complementary or non-conventional treatments.

Unfortunately, there are not many doctors who are willing to prescribe Natural Dessicated Thyroid and as a consequence I have to travel a 5-6 hour round trip to get a prescription. I am not entirely clear as to why this reluctance exists but have been told that the AMA have not endorsed it despite thousands of patients feeling better on it. Whilst I respect that individual doctors must be comfortable with their decisions, this is certainly not making my life any easier.

I do appreciate that it is important for treatment of medical conditions etc to be adequately tested and protocols for managing disease to be based on evidence, but it is also important to listen to what patients are saying about how they actually feel as well as looking at bloods and other tests. There seem to be many patients with thyroid disease who are being told that their bloods are "normal" but they continue to feel unwell.

I would be very grateful, if you would take my view point into consideration, as I believe it represents the experience of many thyroid patients. I am a member of two thyroid support groups and my story is very common.

I have also considered the questions that you listed below:

1. Do you agree with the proposed term 'complementary and unconventional medicine and emerging treatments'? If not, what term should be used and how should it be defined? **I do not agree with the term 'complementary and unconventional medicine and emerging treatments'. I would prefer that 'complementary medicine' was used.**

2. Do you agree with the proposed definition of complementary and unconventional medicine and emerging treatments – 'any assessment, diagnostic technique or procedure, diagnosis, practice,<sup>4</sup> 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.' If not, how should it be defined? **I would define complementary medicine as a range of medical therapies that fall beyond the scope of conventional medicine but may be used alongside it in the treatment of disease and ill health.**

5. Are safeguards needed for patients who seek 'complementary and unconventional medicine and emerging treatments'? **I believe safeguards are important but need to be flexible enough not to disadvantage patients who are already accessing treatments which are working for them.**

6. Is there other evidence and data available that could help inform the Board's proposals? **I am unsure**

#### Options

7. Is the current regulation (i.e. the Board's Good medical practice) of medical practitioners who provide complementary and unconventional medicine and emerging treatments (option one) adequate to address the issues identified and protect patients? **Yes**

8. Would guidelines for medical practitioners, issued by the Medical Board (option two) address the issues identified in this area of medicine? **No, I believe this has the potential to adversely affect patient's and patient choice**

11. Which option do you think best addresses the issues identified in relation to medical practitioners who provide complementary and unconventional medicine and emerging treatments?

**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.**

Kind regards,

[Redacted signature]

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[Redacted signature]

[Redacted signature]

Submission to Medical Board of Australia  
Re: Complementary and Unconventional Medicine and Emerging Treatments

I would like to strongly advocate in support of Option 1 as identified by the Board. The status quo should be maintained.

My reasons for this are as follows:

In July 2010 I left my job due to chronic health issues. I was suffering with chronic pain and muscle spasm due to discs degenerating in my lower back. I also had depression and severe fatigue for which I had no satisfactory answers. The pain and fatigue interfered with my ability to concentrate and my short-term memory. The fatigue became so bad that I could barely drive home safely from work and once home, I had to sleep for two-three hours before being able to get on with normal tasks. I had to cut my work back to two days per week and spent my days off recovering.

In October 2010, I was *finally* diagnosed with Hashimoto's Thyroiditis by a local doctor. I was fifty-four at the time. Prior to this experience with one conscientious doctor - who made it her business to take extra time with patients - **NOT ONE** other doctor in the decades I had been complaining of fatigue and depression, had bothered checking my thyroid function. I was eventually placed on thyroxine. I had also been experiencing abdominal bloating and diarrhoea. I was tested for parasites, but testing was negative. Furthermore, as noted above, I had chronic back pain for which I finally had surgery in January 2012. I had an anterior fusion at L5/S1 and a total disc replacement at L4/5.

After moving from Sydney to the [REDACTED] in 2013, my health deteriorated and I was once more extremely fatigued and experiencing cognitive difficulties. I was also experiencing bouts of chronic diarrhoea, severe abdominal bloating, gastric pain and panic attacks.

I was referred to a gastroenterologist at [REDACTED] Hospital and after waiting ten months I had an endoscopy and a colonoscopy. The results of this testing were negative. Meanwhile, as the symptoms continued, I began attending a clinic of integrative medical practitioners who helped me to improve through the use of supplements and the elimination of gluten, soy and dairy from my diet. I was diagnosed with the parasite, *dientamoeba fragilis*, for which I was prescribed antibiotics, and the parasite was eliminated. It was also found that I have the gene for coeliac disease. As you are no doubt aware, autoimmune thyroiditis and coeliac disease can be comorbid. Although I have apparently not yet developed coeliac disease, I am now aware of the effects of gluten on my body and I avoid it. Furthermore, the effects of the ongoing chronic pain I was experiencing post-surgery were taken into account and I was advised to take bio-available magnesium as a muscle relaxant. I would never have known these things had I only attended conventional practitioners.

The upshot of all this is that I am very disillusioned with Australia's current medical system. Its emphasis is on quick patient turnover at the expense of patient wellbeing. Indeed, my lifelong experiences with conventional GPs have been less than edifying. GPs either don't have any answers to chronic or complex health issues or are not prepared to research the root causes. They have been trained to write prescriptions or refer to specialists, who themselves are frequently mired within a static medical model and not up to date with the latest research. Furthermore, patient education is simply not considered. I have never had hypotheses or explanations offered about my diagnoses from any conventional doctor I have yet seen. These I have had to research for myself. I've even been told to "check Dr Google"! It simply is not good enough!

However, integrative doctors concern themselves with illness prevention and treatment by advising on lifestyle interventions and doing thorough testing. They are aware of the best laboratories and how to interpret test results based on the latest guidelines. My experience with these doctors has given me direction and help in managing my chronic issues. I understand that medical research is not yet able to give a cure to many chronic or complex issues, but at least integrative GPs are aware of where the research is going. Conventional doctors are not. More than once, I have had to advise “garden variety GPs” (as I call them) about my issues and ask for appropriate medication or adjustments in medication. It’s appalling.

Therefore, I reiterate that integrative GPs must be allowed the freedom to practise medicine in the best way they see fit. If they are not getting things right, patients will soon catch on and stop attending their clinics. Patients who present to integrative medical practitioners are highly motivated to get well and they talk to each other. We know who is good and who isn’t!

So, please hands off integrative doctors. For many, many people, these doctors are the only hope they have.

Yours faithfully,

A black rectangular redaction box covering the signature of the author.

**From:** [REDACTED]  
**To:** [medboardconsultation](#)  
**Subject:** Thyroid Extract  
**Date:** Friday, 12 April 2019 11:51:21 AM  
**Attachments:** [image001.jpg](#)

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Dear Sir / Madam,

Concerning my thyroid and the use of synthetic drugs.

I tried all the different Thyroid medications for Hashimotos. They all worked affectively for a short time. Over a period of 1-3 months I would shrink back and would no longer be my happy self. Everybody thought I was depressed. I would get to the point of feeling so detached that I would just fall of the wagon and stop taking my medication. Within a week I would be myself again and get back on my medication and again the decline would eventuate. I was prescribed several different thyroid medications and all had the same effect on me. The worst I ever got was when I became suicidal.

I found a new doctor and she prescribed Thyroid Extract and life has been fabulous ever since approximately 10 years. I'm the same person I was pre Hashimotos on this medication.

Please allow this medication to continue without it my life will be very glum or nonexistent. These synthetic meds are not for me.

I would much prefer the cost of synthetic thyroid medication as the Thyroid Extract is so expensive but I have no choice.

Warm Regards,

[REDACTED]

[REDACTED]

[REDACTED]


[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



19 March 2019

The Executive Officer  
Medical  
AHPRA  
GPO BOX 9958  
MELBOURNE VIC 3001

Dear Sir/Madam,

I am writing to express my concern about the proposed changes to the regulations governing the practice of Complementary and Unconventional and Emerging Medicine. I believe that many Australians have benefitted from the expertise of Medical Doctors who have been willing to consider alternative ways to treat their patients, particularly when patients present with symptoms that do not easily fit within the diagnostic categories, or where their symptoms do not respond to conventional treatments. I believe an integrative approach to medicine is in the best interests of the such patients, and for Australian health consumers as a whole. For example, around twenty years ago I suffered from symptoms related to an intolerance of gluten. I saw a number of GPs who failed to diagnose this. I was referred to a Gastroenterologist, who suggested that I was lying about some of my symptoms, such as waking up to vomit at night, because it did not fit his diagnostic criteria for IBS given my colonoscopy/endoscopy revealed much inflammation, but no Coeliac disease. None of these conventional medical doctors were able to offer me a diagnosis or effective treatment. At this point I went in search of a more open-minded GP who practised an integrative approach to medicine. The result of further investigations, including eliminating foods and reintroducing them, was that I could not tolerate gluten, but was perfectly healthy without it. My point is: Twenty years ago, the concept of gluten intolerance was not accepted by the medical community generally. As a result, my symptoms were dismissed and left untreated. As I was vomiting a number of times a day, I was unable to work and a number of times I was admitted to hospital because of dehydration, at the expense of the taxpayer. It took a Medical Doctor with an integrative approach to medicine to diagnose and treat something that is now well known and accepted.

An overly restrictive policy towards complementary and unconventional and emerging medicine will hinder Australian medical practice, keeping it well behind the rest of the world in patient diagnosis and care. Legislating to restrict progressive approaches will directly and negatively impact the lives of Australians who unfortunately suffer from illnesses that are outside the current diagnostic categories or not well understood yet. It will limit access to

treatments that are viable, non-invasive, safe and often quite economic, leaving patients and their families to deal with the hardships of chronic illness.

It is my understanding that the number of complaints from patients that relate to practitioners who utilise integrative approaches to medicine are no more frequent than those related to practitioners of regular medicine, and in fact the consequences of adverse outcomes are generally less severe in the case of integrative approaches. There appears to be no substantial reason why these complaints cannot be dealt with under the existing guidelines for medical practice.

I believe the proposal for more restrictive regulation of the practice of complementary and unconventional and emerging medicine presents a backward step for medicine in Australia. It will put a heavier burden of paperwork onto integrative practitioners of medicine, leading to increased costs for the patient and a decrease in the number of these doctors. Patient access will become even more restricted, leading to worse outcomes overall and eventually a loss of patient choice over treatment. My integrative medicine doctors have always offered me choice over treatment approaches and fully explained the benefits and risks. Over the twenty plus years that I have accessed integrative approaches, I have had no reason to complain, whilst my experience with other medical practitioners has been less than optimal at times. My experience suggests that the majority of doctors practising integrative approaches take their responsibilities very seriously, making considerable efforts to research their approaches and offer the safest possible care to their patients.

In light of the above, I urge the Board to consider the impact of the proposed legislation changes and to look at alternative actions. My preferred option is that the proposed legislation is not adopted and that the current standards remain in place. Should the changes be adopted, another option would be to make integrative medicine a recognised speciality and increase Medicare rebates accordingly to cover the additional burden of fulfilling the new regulations.

Yours sincerely,

[REDACTED]

Age: 54 years, resident of NSW

Cc: Hon Paul Fletcher MP, Fax: [REDACTED]



**Submission to MBA Consultation document on complementary and unconventional medicine and emerging treatments.**

**May 2019**

**Female 53years** [REDACTED]

**My main long term health problems – have been** Digestion and Gut issues with Lymphatic, circulation issues that also affected my mental health.

**Treatment I undertook before I found an integrative health practitioner.**

In 2004 I undertook to deal with my health issues that had arisen since having my 2 children.

I did so by a number of visits to few medical practitioner's, but I was unable to find a doctor that would look at my symptoms in enough detail to find the correct direction to explore a way to help my health. As my symptoms did not seem big enough to be of concern to the Medical Doctors.

After no Medical Doctor understanding my reasons for my concerns, I went to search alternative help.

I found an integrative health practitioner who within one / two meeting was able to assist me with a change in direction in regards to my consumption of foods and to make adjustments in my products that I had in my environment, that made the most important changes to my health. The medical doctors I visited never thought to look at this direction as a reason to my issues.

The Integrative Practitioner was able to assist with my understanding of my own health so that I could become responsible into the future. Not just for myself but now has also assisted with my children's health as well.

It turned out that I was poisoning myself from the inside with consuming foods that I was sensitive to and that my body was leading me towards **Auto Immune disease**. I was able to change this direction of food consumption and environmental products, and within 2 weeks my mental health and general health started to make a HUGE change in direction. By 8 weeks later I was quite a different person.

The change was **so important** as I was a mother of 2 young children, and I was affecting their lives with my inability to function properly. The changes to my health was necessary for my family to function.

Without these changes I made in 2004, I believe that I would be quite sick now in my 50's and the long term effects on my health ( and my family ) would have been enormous - had I not found a different path with the integrative health practitioner.

I as a human being, have the right to choose with whom I seek assistance with my health issues. The Freedom of CHOICE is our right.

SO I CHOOSE - *Do not introduce new regulations*

The Medical Board of Australia. [medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

**"Consultation on complementary and unconventional medicine and emerging treatments."**

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**From:** [REDACTED]  
**Sent:** Saturday, 2 March 2019 2:03 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary medicine

I am writing to express my concern and dissatisfaction on the proposed changes to patient support of complementary medicine. I am a long term sufferer of CFS/ME as is my 16 year old daughter. We rely on complementary medical treatment to help our condition. There are no standard medical protocols that help. With the proposed changes this will greatly impact our health and my financial capability to afford these necessary treatments. I urge you not to proceed with these changes.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Saturday, 25 May 2019 11:17 AM  
**To:** medboardconsultation  
**Subject:** Freedom of Choice

**I am a sixty year old woman.**

**I sought the help of an Integrative Health Practitioner to support healthy aging without the use of synthetic drugs. I have no long term health issues therefore, sought the help in a preventative capacity. The Integrative Health Practitioner prescribed Bio Identical hormones to support my body as I could no longer produce the required levels necessary for healthy aging.**

**I believe by accessing these treatments I will maintain healthy aging and not require much if any use of other medical services.**

**Since receiving treatment and guidance from the Integrative health practitioner I feel healthier, more active and engaged with living. My mental health is more robust.**

**The prescribed Bio Identical hormones have only give positive effects which are supported by not only my wellbeing but also by pathology results. The results have now allowed me to reduce the dosage to maintenance levels.**

**The standard of care that I receive is of a very high standard and the Integrative Health Practitioner takes the time to listen and doesn't follow the 'rote' treatment plan and procedure I so often experienced from mainstream GP's who reach for the prescription pad as soon as I enter the room. I receive individualised care rather than a one size fits all approach and the Integrative Health Practitioner looks further than symptoms and focuses on finding the cause of or functional reason for any symptoms and signs that I may be experiencing.**

**Australia's Healthcare System is broken and by reducing patients access to Integrative Health Practitioner's, whether they are Integrative GP's or Practitioners of other Complementary Therapies is going to contribute to shattering and already broken and overstretched healthcare system. The people of Australia and the world are entitled to Freedom of Choice of healthcare and this is being severely eroded. Whether it be access to Complementary therapies Integrative GP's and the right to choose vaccination or no vaccination we do not have Freedom of Choice.**

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**From:** [REDACTED]  
**Sent:** Tuesday, 5 March 2019 8:57 AM  
**To:** medboardconsultation  
**Subject:** Integrative doctors and patients rights

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:

continuous diarrhoea over 18 months since hospitalisation for Staph infection.

This Doctor is the only one I have found who has been able to test, diagnose, and treat this condition.

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.

This Doctor is seriously trying to make a difference, and has realised that many conventional treatments simply do not work, or produce more complex side effects.

I would be happy to discuss this on the number below.

A very concerned patient.

Name: [REDACTED]

Date: 4/3/2019

Phone : [REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 17 April 2019 9:10 AM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments'

Dear Sirs/Madam

I refer to your request for feedback on your proposed changes to complementary and unconventional medicine.

I **strongly oppose** the adoption of Option 2.

It is difficult to understand what your objection is to the current status quo as you provide no rationale for your position.

If it is that doctors are poorly trained on non-medication options then I would strongly recommend that you encourage further training or at least an understanding of these areas.

If it is that medicines are safe and complementary medicines are not then that is an unconscious bias not supported by either research or more importantly the consumer experience.

However, it comes down to this.

I want the right to choose regardless of which methodology is adopted. And I want the option to speak to my doctor openly about those decisions to gather the information to make the right decision for me.

Medication errors happen when the consumer cannot do this.

I see health on a spectrum. That spectrum does not start with medication. That spectrum starts with lifestyle changes and then escalates to complimentary medication and finally medications. I use medications but sparingly.

Medication should be used wisely. How many people are addicted to sleeping tablets because the underlying cause of their sleep issues was not addressed?

So it should be my choice.

I want to be able to have a PARTNER in my health where I can discuss fully and frankly the risks and benefits of ALL options.

If your position is that you don't believe in complementary medicine then I believe that makes you out of touch with a large segment of the population and what people find effective.

The "choose wisely" campaign run and funded by NPS Medicine Wise acknowledges that medicine should be used wisely.

Often medicines are not the answer let alone their benefits outweigh the risks of other alternatives. What is a person cannot sleep because of food intolerances, grief over the loss of a loved one, too much technology, poor nutrition, etc Medicine is not always the answer.

All medicines have risks. The Pharmaceutical Society of Australia estimates that risk at 1.2 million people every six months.

I am one of them. I was hospitalized 28 times and am now disabled with an acquired brain injury because of poor prescribing practices including but not limited to being a poor metabolizer of certain pathways.

As an aside, Australia should be adopting international best practice for pharmacogenomic testing (already implemented in Holland, the FDA, and currently being implemented in the EU), and its refusal to do so is not only putting lives at risk but also causing a loss of credibility.

The unconscious bias is that medicines do not have risks. They do.

The Professor of Immunology and Professor of Clinical Pharmacology who identified that I was being poisoned due to poor prescribing practices advised that I was only to be given medication as a last resort (that is in a life-threatening emergency). They told me I had to find ways to keep myself well without medicine. I have.

If your position is that no doctor can discuss non-medicine (including complimentary health alternatives) with me then that means that I cannot access medical help.

But it comes down to this. I want informed consent and the right to choose and I want to partner with my doctor. Option 2 does not achieve this.

with thanks

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 6 March 2019 10:08 AM  
**To:** medboardconsultation  
**Subject:** Public consultation on complimentary and unconventional medicine and emerging treatments

To whom it may concern,

I see an Integrated Health Practitioner who has saved my life through their extensive alternative knowledge and approach.

I cannot take synthetic medicine and I prefer to be given alternatives before being left with pharmaceutical medicine.

I also use compound pharmacies for my medication.

Without these options, without having access to these alternative options, I'd be bed ridden and unable to care for my family.

It is frustrating and extremely concerning that you feel you can take away our options for seeking medical guidance, and that there is only one way of seeking help.

Our natural therapies are slowly being eradicated and now you're wanting to get rid of highly educated and knowledgeable alternative medical assistance by Integrated Practitioners.

It has to STOP.

We pay our taxes.

We should have a say in OUR healthcare and it should be OUR CHOICE.

Leave our choice alone.

I want to keep my Dr who saved my life with their extensive knowledge.

I want to keep my compound chemist who makes my thyroid medication.

Regards,  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, 17 March 2019 3:17 PM  
**To:** medboardconsultation  
**Subject:** Integrated Health Practitioners Compound Pharmacy changes

I'd like to submit my concern about the changes you are proposing as a Board.

I see an Integrated Health Practitioner, and this Dr gave me my life back. The Dr's knowledge of alternative therapies is extensive and my body responds better to alternatives than Pharmaceutical drugs.

I also use a compound Pharmacy for my Dessicated Thyroid, which I cannot live without. I can't take synthetic thyroid medication.

I'm a tax payer and as such should have the option of choice. Choosing which Dr I see and their modality of treatment.

Not everyone fits into the box of Pharmaceutical treatment and you should not be interfering with that choice we need to have.

If you remove access to those of us who respond well to alternatives, there will be a back lash and more sick people will be unable to function and care for their family.

This decision has VERY SERIOUS CONSEQUENCES to my family.

Please don't take away what helps me and many others to function, to be happy and manage our symptoms better. The medical profession is meant to help, not make us worse or sicker. Don't take away our current choices or reduce what is available to us.



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**From:** [REDACTED]  
**Sent:** Thursday, 4 April 2019 10:13 AM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments

To whom it may concern,

My name is [REDACTED] and I have hypothyroidism. I was prescribed synthetic regulated Thyroxine ( T4 only) medication to keep my hypothyroidism/Hashimoto's disease under control. I had depression, brain fog, I gained 8 kilos, my hair was falling out and I could barely function. Thyroxine did nothing to help and I was repeatedly told by my GP - "You are fine".

Fast forward a few years of being so sick I found an Integrative GP and had the chance to try Natural Dessicated Thyroid (T3 and T4 combination ) within a matter of weeks all my sickness and symptoms started to disappear. My Integrative GP takes the time to listen, investigate my symptoms and present me with a well thought out comprehensive patient plan. I have lost some kilos and for the first time in 7 years I was starting to feel normal and can function in my daily life.

In my condition a one size fits all pill is not the solution. I urge and plead that if you take T3/T4 combo / Natural dessicated thyroid away from legally being prescribed and made by a compounding chemist you need to find an viable alternative as it will be detrimental to not only myself but many others with my condition.

I urge you to take notice on behalf of those of us who suffer.

Treat the symptoms not the numbers and stop lining the pharmaceutical company pockets and shareholders.

My Integrative GP has changed and given me back the life I had.

I welcome any discussion should the opportunity arise.

Regards  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 27 June 2019 10:51 AM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

I am responding to the MBA review of guidelines impacting integrative medicine. I choose Option 1, that no new regulations are required for doctors practicing complementary or integrative medicine.

I have close family that are registered doctors and not practicing integrative medicine. My position is based on my own experiences rather than being a "conscientious objector".

Over a period of 10-15 years a family member was unwell and visited a GP and specialists for their condition. No progress was made and it was often implied or explicitly stated that it psychological.

As the patient continued to deteriorate we decided to visit a doctor practicing integrative medicine (and who also had a degree in biochemistry). Over the course of the following 1-2 years we saw significant improvement. A diagnosed autoimmune disease had receded and stability in energy and general wellbeing had started to rebuild. I would not be supportive of additional regulation or demonisation of integrative medicine.

In my experience, a GP was so concerned about medicare regulating blood test that they failed to pick up a building issue. Once the symptoms become clearly visible it was too late and now after over \$10,000 in various scans and blood tests I will be on medication for a long period, maybe a lifetime. So medicare saved a few blood tests and will now pay significant more.

This is where the MBA should be focusing not integrative practitioners.

Regards  
[REDACTED]

## Submission on Complementary and Unconventional Medicine & Emerging Treatments

My name is [REDACTED] and I'm a 68 year old woman. I spent many years feeling unwell, fatigued with very low energy, and would get heart palpitations just trying to walk up a flight of stairs.

I was only in my early forties and was not overweight.

The doctors I sought help from offered no solutions. Eventually it became so debilitating I had to resign my teaching position. The fatigue was so overwhelming I would fall asleep showering in the morning, and whilst driving the car. I was just limping along in life with no vitality.

I suffered this for about fifteen years, so I was most grateful when I found an integral medical doctor, who spent the time to investigate my condition and run blood and stool tests, amongst others. He diagnosed chronic fatigue due to a candida overgrowth in the GI tract.

I was put on Nilstat for a month and a yeast-free and a sugar-free diet for a year. After only a month of this treatment I felt better, had more energy and could participate in many more daily activities. In short I had my life back.

After some time back on a 'normal' diet, my health declined and the fatigue returned. It was found then I had Hashimoto's disease and insulin resistance.

Also blood tests showed I had a number of food sensitivities, especially to gluten and dairy. Removing these foods from my diet made a huge difference to my well-being. Also various deficiencies were supplemented, such as B12, iron, vit. D and omega 3 fatty acids. My Anti-Thyroglobulin antibodies halved, and TPO went back to normal. Also blood sugar levels are within normal range.

I would like to stress the fact that all these problems were addressed after careful, targeted tests, which are not routinely given by the average general practitioner. The approach to medicine by integrative medical practitioners is especially important in chronic diseases.

I want to retain the freedom to choose to attend an integrative medical practitioner, as these have proved to have been by the most effective in treating my conditions. Others have failed to provide much in the way of relief at all.

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**From:** [REDACTED]  
**Sent:** Tuesday, 25 June 2019 5:42 PM  
**To:** medboardconsultation  
**Subject:** Fwd: Consultation on complementary and unconventional medicine and emerging treatments

- I have chosen to see Integrative Medicine doctors because:
  - 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.

**I choose Option 1...Because I have been harmed by several surgeries and without the choice of complementary practitioners I would not be able to do as I am today.**

**The Doctors told me there was nothing more they could do to help me so without the help of complementary options**

**I would not be as well as I am today and may even be bed bound and on a disability. I could not afford to continue if this was regulated as proposed.**

**[REDACTED]**

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**From:** [REDACTED]  
**Sent:** Wednesday, 6 March 2019 8:30 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: Anxiety, Depression, carpal tunnel and in the past, tuberculosis, asthma and more.

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:

Concerned,

Name: [REDACTED]

Signature:

[REDACTED]

DATE: 5 March, 2019

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**From:** [REDACTED]  
**Sent:** Tuesday, 25 June 2019 1:30 PM  
**To:** medboardconsultation  
**Subject:** Mould illness

To Medical Board of Australia

I writing about my concerns with your decisions your making about integrated medicine.

Our family have been exposed to toxic mould for how long we don't know as we had a leak in a water pipe under our floating floorboards and hard wood floorboards. I discovered this leak. April 2017. As it was covered with insurance we called the insurance

company. As I discovered nails rusting and wet staining around them in the hallway. Lindsay lifted the inspection hole with a crow bar as the wood was so swollen the wood shot up into the air. Water was dripping from under the floorboards all

the way down the hall way to the front door we have a video of this. The insurance company said get a plumber and the plumber came around and found the leak was not in the bathroom next to the hallway that we thought it may be but five metres away in the kitchen. The plumber lifted up the floating floorboards and again the jarrah hardwood floors inspection hole was swollen with water so was hard to open and he found very hot water spraying up onto a floorboards from a leaking pipe at the other side of the kitchen.

This is where it all went wrong. To try and keep it short but very hard as we had to live in a caravan in our back yard for 15 months with all five of us myself, Lindsay and our three kids aged thirteen, eleven and eight. We spent three months in the caravan park after the insurance company only wanted to give us three nights. I called my credit union and complained how we were all getting sick as that's where we got our insurance through and the bank manager arrange accommodation which was then paid for by the insurance company.

April to June 2017 when we first found the water leak in the pipe we had two inspection holes open waiting for the insurance company to come and fix the house for water damage. This is when my family was at its sickest. We complained about the musty horrible smell in

Our house to all the people the insurance company sent to our house. After two months of waiting and getting sick everyone had headaches, sore throats, my son and I strep throat, I was so lethargic no energy, My daughter [REDACTED] was just like me. [REDACTED] had sore eyes where he said they were so itchy when he was in the house and he also noticed he couldn't think straight. He would go to work and his symptoms would settle down. So he looked up on the internet and came across the symptoms we were experience are similar to being exposed to mould. So that's when we complained and had to fight to get out of our house as it was going to kill us.

Trying to keep this horrific ordeal short we went to doctors and one of my children [REDACTED] had blood test my son wouldn't as he seen his sister faint after the blood test. We showed the doctor the video of the water and mould in the hallway the night we found the water dripping.

She said if there's mould in the house get out. I told the insurance company this and she said "a doctors not a builder". Anyway I had a throat swabs and had more antibiotics again for sore throat after dealing with the strep throat the month previous. My throat only felt

better when we moved into the caravan park. But then we went back to move all the furniture into the large lounge room as they were scoping to move the floorboards and again I told these people again how my throat was sore and would properly have to go

back to the doctors for more antibiotics and that's what I did the next day and was given more antibiotics for a sore throat. My daughter [REDACTED] didn't need any more Panadol after we moved out as she would wake up and say she needed a Panadol for her headache

every morning before school. I was so tired I had to sleep in the afternoon to get through the day.

We continued to fight the insurance company as they wanted us to move back into our house as we were told the insurance company told us we have two reports saying your house is safe but they wouldn't give us these reports, it was getting expensive for them even after six different people the insurance company contractors came to our house. The insurance company eventually had mould remediation done on our home and the last guy they sent left mould

everywhere as [REDACTED] was suspicious of him and he went under the floorboards with full body suit mask etc. and found lots of mould and he didn't even lift the floating floorboards in the kitchen where mould was rampant. All he gave us was a spray to spray over our bench tops in the kitchen. The insurance company forced settlement on us. So we had nowhere to go and no house fixed so we had to move into our caravan all five of us. We then find out the mould remediation company forged documents and was not even certified as he claimed on his certificates. We had to convince the ombudsman after all the evidence we had on fraud, forgery, lies etc. We finally moved into a house without a kitchen in December 2018.

In that time my son had a sore nose I told the doctors of this they did a swab nothing. It wasn't till we contacted an integrated doctor as my daughter [REDACTED] had nearly thirty days of school that year and the year before as not feeling well and found out she had elevated IGE levels

We knew all this was from the mould exposure as I have had three healthy pregnancies all breast fed the children to twelve months all healthy kids. The integrated doctor said ask the doctor to test for staph in the nose for my son and that was the first time a doctor looked up his nose and saw sores in there. No one looked up his nose so he put up with this for over a year. He was treated for staph infection and within three weeks was fixed and has not had a sore nose since being treated for a few months now.

[REDACTED] had health issues which he has always been healthy enlarged prostate, hernia and generally not feeling great and now he has food sensitivities where he never had before. He can't have certain foods which he had no problem with before because they affect how his body feels. He asked the doctor to test him for mould she didn't he ended up walking out.

My daughter [REDACTED] was tested with a nasal swab suggested by an integrated doctor and they found three bacteria in her nose she is now being treated for this and has not missed days of school this year for this year for being sick so far.

My symptoms can be half good one day and the next I need to rest so my body is so fatigued I know this is from the exposure of mould. Doctors are not trained in mould illness as I got tested for mould exposure in and the doctor said I can't read the results.

All my family are still struggling from the mould exposure and until doctors get trained about the effect of mould we just all suffer. There is more to this story this is only touching the iceberg so to speak.

I believe Integrated doctors have a role in the health of all Australians.

Thank you for reading this

[REDACTED]



The Medical Board of Australia  
GPO Box 9958  
Melbourne VIC 3001

April 10, 2019



Dear Board Members,

I write in response to the Public Discussion Paper regarding restricting access to complementary medicine and integrative medicine practices.

As a member of the public who has benefitted from several forms of what the board refers to as "complementary and unconventional medicine", I take exception to any change which would restrict my access to these treatments.

I do not agree that many of these forms of treatment are not based on evidence. I have been suffering from an illness that is multi systematic and symptomatic, and not recognized in Australia by conventionally trained doctors. Before finding alternative help, I have been treated for symptoms, rather than cause. That is why, when I happened onto an integrative medical practitioner, I did my own research. I choose to treat the illness by boosting my own immunity, and gut health with guidance.

As an adult I do not need protection by the Medical Board, especially when it aims to restrict the very things that have finally helped me to regain my health. I have benefitted greatly from supplements, acupuncture, and complementary medicine, taking an integrative approach to repairing and maintaining my health.

I do not, therefore believe any strengthening of guidelines related to complementary and "unconventional" medicine, compounded medicine prescribed by doctors, or other treatments I may choose to undergo.

My wish instead, is that more doctors do your own research and become educated on Biotoxin-related illnesses. There is a great deal of science behind this illness, and many of us have been suffering while we search for help. Finally, a Parliamentary enquiry committee has recommended "that the Department of Health, in consultation with patient groups, medical practitioners, and health bodies, develop clinical guidelines for general practitioners for the diagnosis, treatment and management of CIRS-like conditions". I have attached the paper for your reference.

When you refer to lyme-like illnesses, it is just possible the patient is suffering with Chronic Inflammatory Response Syndrome, which has many of the same symptoms, and has been recognised overseas for several years.

If conditions such as these were recognised, perhaps the medications for treatment could be on the public system.

Although they often are very costly, it is only since undergoing these treatments I have found any healing.

In a system where many of us cannot afford the private health insurance, and have to pay out of pocket for every basic medical appointment, please do not endorse a change that would restrict my choice of treatment.

Conventional medicine has it's place, but it is not the only place.

Regards,



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**From:** [REDACTED]  
**Sent:** Friday, 5 April 2019 3:42 PM  
**To:** medboardconsultation  
**Subject:** New Regulations for Complementary and Unconventional and Emerging Medicine

My name is [REDACTED] aged 63 and have lived in NSW all my life.

I have been made aware the proposed new regulations for the above and wish to make you aware that Complementary Medicine has been a huge factor in my life since 2003. At this time I developed leukaemia and have since had a compromised immune system.

I have read some amazing statements regarding complementary medicine and find it incomprehensible that the Medical Board of Australia is considering taking a stance against the practice.

My doctor will always discuss options for the treatment of my issues and make me aware of any potential problems with all forms of treatment. I believe it is essential to have choice when it comes to the treatment of my issues which are many and varied as a result of being immunosuppressed.

My preferred outcome of your review would clearly be that things remain as they are today.

The next best option is that your new regulations apply to all medical practitioners as the conventional Medical Practitioner should discussing all treatment options (complementary or otherwise) and make you aware of all research occurring for any condition. I must say prior to me finding my current Medical Practitioner I had a few very ordinary experiences with conventional GPs. Furthermore, I would hope that Integrative Medicine utilising Complementary, Unconventional or Emerging Medicine as well as conventional medicine be recognised as a Specialty in order to allow increased Medicare rebates to help cover the increased costs associated with these new regulations under this option. If not clearly the patient will be the loser.

Regards [REDACTED]



Dear Sir/Madam,

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

I read with deep concern the discussion paper by the Medical Board of Australia (MBA) regarding their recommended restricted guidelines.

The use of alternative, complimentary and integrative health care and medicine (health modalities) is an integral part of Australia's health system and I see it used successfully by many people in the management of their health.

The discussion paper and analysis is inadequate in identifying any issue with health modalities and seeks to use a single, specific event to limit the treatment and options available to medical practitioners and patients alike.

Implementing the recommended option and restricting the use of health modalities on the basis of this discussion paper is to tell Medical Practitioners and the public that because a person died from a botched liposuction operation for dementia, a doctor cannot recommend a Chiropractor for a person's bad back.

Specifically, the discussion paper:

- Considers all integrative, complimentary and alternative therapies, modalities, treatments and medicine as a single one, ignoring the fact that many are completely unrelated;
- Does not consider the role of different health modalities in Australia: their effectiveness, evidence base, risks, safety, professional regulation and government regulation;
- Does not focus on patient outcomes or reflect that a person has responsibility for their own health choices, and directly wears the consequences, risks and side-effects of any therapy;
- Uses a small number of cases with hormone therapy, steroids and Lyme disease to attempt to target, discredit and stop the use of other unrelated, credible, proven and safe treatments that are in common use in Australia;
- Assumes that 'conventional medicine' has an equivalent or better solution to every health issue addressed by health modalities, care and medicine;
- Shows no evidence that it has consulted across government bodies, regulators, health modality associations or medical bodies to consider the medical and health . By grouping all health modalities into one, it demonstrates that it has no knowledge of the modalities listed, benefits or use in the ongoing health of a person, and by extension, to the Australian health system.

This discussion paper is seeking to target and discredit the use of health modalities that are in common use in Australia and part of general medical treatment and health practice. The consequences of Option 2 are detrimental effects on the health choices, medical practice and health outcomes of all Australians.

Below is a general comment on the paper and then responses to the MBA's questions.



### **General response to the Discussion Paper:**

Firstly, this paper treats all health modalities other than 'conventional medicine' the same. This is despite many health modalities including Traditional Chinese Medicine and Yoga having existed, evolved and been used throughout Australia and other parts of the world for sometimes hundreds of years. It is inconceivable that these modalities would still be in existence if they were not effective and safe.

The discussion paper referred to the safety of health modalities but does not refer to the extensive body of proof for some of the modalities for their effectiveness and safety, or compliance with regulation. Many of these health modalities have been actively used in Australia for many years, require university qualifications (or other professional training) to practice, have professional bodies that ensure the conduct, safety and professionalism of practitioners and have their treatments regulated by the Therapeutic Goods Act. To regulate these health modalities in the same way as ones that do not have this standard of regulation is to miss the assurance already provided by regulation and to also miss the opportunity to address how new therapies are developed.

Restricting guidelines for medical practitioners would reduce the public's ability to choose the health modalities they want to manage their health. With medical practitioners unable to provide information, prescribe or recommend health modalities, this will reduce the information shared across all medical practitioners and the public and limit the information people have to manage their health.

Further, this reduces the demand for the health modalities, and therefore the viability for these practitioners. I know two naturopaths who will not practice any more because they cannot generate a viable income. While income is not their primary consideration for their profession, living in Australian society requires people to make a living somehow.

Therefore, while the MBA states that they do not intend to limit the availability of these health modalities, Option 2 has the exact effect of reducing the number of practitioners and so the availability of these health modalities, limiting the information and choice and ability of the Australian public to manage their own health.

This discussion paper also assumes that 'conventional medicine' has an equivalent or better solution to the health issue addressed by health modalities, care and medicine and that these cannot work together.

In my experience, this is absolutely not true. For example, I had repetitive strain injury in the 1980s that threatened my ability to work. The conventional medicine treatment included physiotherapy and then the use of electricity in my forearms. This produced little short-term relief and no long-term repair. When I could see that western medicine was not going to heal my RSI, I sought alternative therapies and practices. I found the solution in a number of therapies that were all not available through a medical practitioner. I used Alexander Technique, meditation and massage, all considered outside of 'conventional medicine' at the time. After thirty years, I have never had a recurrence of RSI. If I had stayed with the conventional medicine, I would have had a permanent health issue which would have stopped my chosen career, as I had seen with other people.

Another example is a chest infection I had some time ago. After two x-rays and three courses of anti-biotics in five weeks, my chest infection was the same. My doctor decided I had asthma and prescribed an inhaler. I did not have asthma. After two sessions with an alternative health practitioner, my chest infection had reduced to 25% of its original severity within 3 weeks and it was completely healed in six. There is no conventional medicine I am aware of that could not have produced the same result in the same time.

Restricting the guidelines for the use of health modalities also assumes that conventional medicine is not, will not and cannot evolve. This is also not true.

For example, western practitioners are now realising the impact of gut bacteria and gut health on a person's overall body and health. Twenty years ago, my doctor scoffed when I spoke about the role of diet (especially simple carbohydrates) on my mental clarity and health in general. I can see that the present medical awareness has been driven not by laboratory research, but by the increase in the number of people who have used health modalities, taken this approach, spoken with medical practitioners about the results and have prompted further research by Western practitioners.

Another example is mindfulness and meditation. This provides enormous benefits to the lives and health of people, however without the source coming from alternate health and meditative practices, it was not going to be used. It was also not going to be developed by conventional medicine. Removing the natural practitioners thus removes a critical element in the evolution of conventional medicine and a medical practitioner's ability to offer advice and treatments to a consumer.

The discussion paper also did not consider the patient outcomes, or the role of the patient in their own health. It did not consider the responsibility and ownership of a person's health and their options to choose alternative, complimentary and conventional treatments, and to make their own decisions regarding their own body. Restricting these guidelines discredits the role and right of people to manage their own health. The approach of conventional medicine is mostly in chemicals and drugs which, more often than not, come with warnings, risks and side effects. I have recently taken Livial, for HRT which has the risks of breast cancer, nausea and others. The alternative treatments do not contain nearly the same degree of side effects or risks. I know of no natural therapies, vitamins or other supplements that increase the risk of cancer for the patient. Restricting these guidelines removes many of the information available for people in selecting these treatments, and deciding for themselves, the treatment, effectiveness, side effects and risks that they are prepared to endure.

#### **Answers to Questions in the Invitation:**

- 1. Do you agree with the proposed term 'complementary and unconventional medicine and emerging treatments'? If not, what term should be used and how should it be defined?**

The proposed term is non-sensical as it is an attempt to categorise all non-conventional therapies the same. To consider naturopathy in a similar way to stem cell theory does not pay credence to the basis, treatment, application, safety, regulation or risks of either. The MBA needs to take a different view to the categorisation of therapies and to the outcomes

to the patient. The basis of the conventional vs other treatments is a dis-service to all modalities and to the intention of medicine, that should be the outcomes for the patient.

- 2. Do you agree with the proposed definition of complementary and unconventional medicine and emerging treatments – ‘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.’ If not, how should it be defined?**

No. Please refer to the above answer. Putting together all non-western health modalities does not serve either conventional medicine or any of the modalities in question. It is also misleading in the background, health practice, therapy, risks, regulation safety and effectiveness of any of the modalities in question. Most of the modalities named in the discussion paper are in the common knowledge of the Australian public and have been used for many years, and so it is appropriate to name them and to expect a reader to have some knowledge of the modality or be able to inform themselves. Any procedure or treatment from any of the modalities should be referenced as such, conventional or not.

- 3. Do you agree with the nature and extent of the issues identified in relation to medical practitioners who provide ‘complementary and unconventional medicine and emerging treatments’?**

No. This paper does not provide the information required to communicate issues with the modalities in question. For a medical practitioner to provide inappropriate information and care for a liposuction operation does not mean there is a problem with the practice of naturopathy in all of Australia. Nor does it mean that all non-conventional modalities should be excluded from conversations between medical practitioners and their patients.

- 4. Are there other concerns with the practice of ‘complementary and unconventional medicine and emerging treatments’ by medical practitioners that the Board has not identified?**

The MBA has not identified problems with most of the modalities that it seeks to restrict from medical practice. There are already professional bodies, regulations, government authorities and international and professional codes for many of the modalities listed. The MBA has provided no evidence that these structures and bodies are not working.

- 5. Are safeguards needed for patients who seek ‘complementary and unconventional medicine and emerging treatments’?**

The MBA has not provided any evidence that patients are in need of additional safeguards. It has also not provided any evidence that for most of the non-conventional modalities, that the existing structures, regulation and professional conduct are not effective in ensuring patient outcomes and safety.

- 6. Is there other evidence and data available that could help inform the Board’s proposals?**

The MBA needs to seek and use information regarding the effectiveness, safety, risk, professional conduct and regulation of each of the modalities, if they are to provide guidelines that are effective for patients to achieve effective health outcomes from medical practitioners.

- 7. Is the current regulation (i.e. the Board's Good medical practice) of medical practitioners who provide complementary and unconventional medicine and emerging treatments (option one) adequate to address the issues identified and protect patients?**

This discussion paper provides no evidence that the existing regulation is not working or is not protecting patients.

- 8. Would guidelines for medical practitioners, issued by the Medical Board (option two) address the issues identified in this area of medicine?**

No. The 'area' of medicine defined by the MBA in this discussion paper is too broad to warrant its use for addressing any practices or issuing guidelines. The 'area' includes a number of health modalities with different purposes, treatments, regulation, professional standards and risks. Addressing them as one 'area' does not provide a meaningful way to address any issues with health practices. In addition, any review of guidelines should start with the intention of providing effective outcomes to people (patients), and empowering a person with their own health.

- 9. The Board seeks feedback on the draft guidelines (option two) – are there elements of the draft guidelines that should be amended? Is there additional guidance that should be included?**

The discussion paper starts with the lumping together of a number of alternative and complimentary health practices that are well regulated, proven, safe and effective with the experimentation and inappropriate use of substances by medical practitioners. It then seeks to restrict the advice and application of all by medical practitioners. Such a basis is akin to telling a patient that their doctor cannot advise them about their vitamins because of the mis-use of steroids by a practitioner in another state.

The basic premise of the discussion paper is flawed. There is then no reference to the 'stakeholders' that have 'raised issues'. The intention of providing effective health outcomes to the Australian public, is completely missing. Case studies that demonstrate a systemic issue that covers all non-conventional modalities is not provided. A small number of individual cases regarding steroids, hormones and Lyme disease do not demonstrate a systemic issue that warrants any review or restriction to the scope of modalities referenced.

The recommendations and guidelines coming from this basis cannot be anything other than flawed.

- 10. Are there other options for addressing the concerns that the Board has not identified?**



The MBA needs to first specify the issues that it is addressing with the practices and modality that these exist. It needs to be specific in its scope and application and address these within the context of the existing regulation, professional control and conduct.

**11. Which option do you think best addresses the issues identified in relation to medical practitioners who provide complementary and unconventional medicine and emerging treatments?**

- a. 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.

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**From:** [REDACTED]  
**Sent:** Thursday, 20 June 2019 5:37 PM  
**To:** medboardconsultation  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments'

Name: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19<sup>th</sup> June, 2019. The Medical Board of Australia has released a public consultation paper to seek feedback on options for clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments.

'Public consultation on complementary and unconventional medicine and emerging treatments'  
to [medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au) .

My Argument: that long-term antibiotics for bacterial infectious diseases should not be considered as belonging within 'complementary and unconventional medicine and emerging treatments.' Australian infectious disease specialists have a long tradition of using long-term antibiotics for bacterial infectious disease, when needed.

I am a long-term sufferer of Borreliosis, or 'Lyme-like' disease. My Lyme-Literate Doctor (LLD) in [REDACTED] is faced with being closed down if the Medical Board of Australia decides that treating Borreliosis sufferers with long term antibiotics is 'complementary and unconventional' and that the practice should be stopped.

If the Medical Board of Australia were to prevent Australian LLD doctors from using long-term antibiotics, thousands of very sick people would be left with no treatment at all. I believe that long-term antibiotics for bacterial infectious diseases should not be considered as belonging within 'complementary and unconventional medicine and emerging treatments.' Australian infectious disease specialists have a long tradition of using long-term antibiotics for bacterial infectious disease, when needed.

Until 2018, there was controversy regarding long-term Borreliosis and some believed that the bacterium was not present or active in the patient after short term antibiotics. However, in 2018, Middelveen et al. used histopathology and PCR to show that human patients with persistent Lyme disease symptoms had ongoing spirochetal infections despite antibiotic treatment. This "persistent, intact, metabolically-active *B. burgdorferi* after antibiotic treatment of disseminated infection" had been shown in primates previously (Embers et al. 2017).

A recent survey showed that 88% of Australian Infectious Disease specialists had prescribed long-term antibiotics for bacterial infections (Kiss et al., 2019). In fact, before I was diagnosed with Borreliosis, my infectious diseases specialist prescribed long term Clarithromycin because he knew I was very ill but was unable to pinpoint the bacterial agent responsible. When I showed evidence of Borrelial infection serology, his secretary told me he did not treat Borreliosis patients and I was forced to seek out a LLD.

My own experience has shown that long-term antibiotic treatment (three years), prescribed and carefully monitored by my LLD, did cure my long-term (eight year) *Borrelia* infection. I am now symptom free and very grateful for the care I received.

My scientific background: I am a recently retired Senior Research Scientist with [REDACTED]. My research was based on soil and plant microbiology (fungi and bacteria).

#### References

Embers ME, Hasenkampf NR, Jacobs MB, Tardo AC, Doyle-Meyers LA, Philipp MT, Hodzic E (2017). Variable manifestations, diverse seroreactivity and post-treatment persistence in non-human primates exposed to *Borrelia burgdorferi* by tick feeding. *PLoS ONE* 12, e0189071.

Kiss CR, Lau JSY, Yeung A, Wooley I (2019). Infectious diseases physician attitudes to long-term antibiotic use. *International Journal of Clinical Pharmacy* 41(1), 18-21.

Middelveen MJ, Sapi E, Burke J, Filush KR, Franco A, Fesler MC, and Stricker RB (2018). *Healthcare* 6(2) 33.

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**From:** [REDACTED]  
**Sent:** Tuesday, 2 April 2019 4:05 PM  
**To:** medboardconsultation  
**Subject:** Complimentary,unconventional and emerging medicine

Hello my name is [REDACTED] I am 49 yrs old and I'm from NSW.

I am writing in regards to the proposal for creating a strict new set of regulations governing the practice of Complimentary and unconventional medicine.

For the first time in my life I have finally found someone who worked out why I have been so unwell. My husband and children also see my dr and for years my daughter has been vomiting and no one knew why except my this dr It's crucial that we have the freedom to choose our medical treatment.

Please don't do anything to change this surgeries operation

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 20 March 2019 11:33 AM  
**To:** medboardconsultation  
**Subject:** 'Consultation on complementary and unconventional medicine and emerging treatments'

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.

Please allow my treating doctor to provide emerging treatments. I have an emerging illness as defined by the National Centre for New and Emerging Diseases . Their statement clearly says there are no conventional treatments for ME/CFS. I suffer the whole time. I'd rather not suffer even more please.

[REDACTED].

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**From:** [REDACTED]  
**Sent:** Thursday, 30 May 2019 5:01 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine.

To the Executive Officer of the Australian Medical Board , I am very concerned about your proposed changes to emerging treatments and complementary medicines.

I beg you to consider option ONE - NO change to the current status quo .

My 18 year old daughter was bitten by ticks on a cadet camp in [REDACTED] and became VERY unwell. Fortunately her diagnosis was comparatively quick and the cause of her illness was found to be multiple tick infections , both bacterial and viral.  
She has DSCAT ! Debilitating Symptom COMPLEX attributed to ticks.

She was unable to attend school and was becoming progressively sicker with terrible joint pain in legs and wrists , photosensitivity to light , meat allergies [ attributed to the ticks by Professor [REDACTED] ] headaches , cardiac issues [ also attributed to tick infections by a cardiologist] , nausea , confusion and unable to concentrate , terrible fatigue and the list goes on and on and on ...

This was a VERY fit girls who had only ever needed about two courses of antibiotics in her 18 YEAR life, for tonsillitis .She had just hiked an EIGHT DAY cadet camp carrying a heavy pack up and down hills with ease. She is captain of her soccer team , athletics champion, house captain etc etc and NOW unable to do ANY sport at all, BUT thanks to long term antibiotics and other complementary medicine, she is able to go to school and function and HOPEFULLY complete her HSC . She is INCREDIBLY positive and has managed to maintain this positivity throughout her treatment due to the fact she can feel her self improving . Although a long way to go , compared to 12 months ago she is doing well.

Whenever she has come off the antibiotics over the last year she has become terribly ill again .Within 3 days the headache , terrible pain etc etc descend on her. Nausea and inability to eat overcome her. She finds even walking painful.

We have consulted numerous medical specialists and they all agree that her current treatment is WORKING and we should not change/ modify it in any way until AFTER her HSC .Her treatment involves PROVEN treatments with vitamins [ especially high dose IV vitamin C recommended by a senior microbiologist ] and other supportive medication , as well as antibiotics .

I am a PHARMACIST and would not subject my daughter to a treatment of multiple long term antibiotics unless I felt it was absolutely necessary . Which is why I have consulted various doctors to determine the best approach . I wish to get her off antibiotics ASAP but until the end of her HSC this is not possible, or else she would be unable to complete her study .

Before the tick bites she was hoping to be a doctor , now we just want her to be able to complete her HSC and get better , and then hopefully, eventually, pursue her medical dream.

To take away this course of treatment and support would be the end of her functioning life .

There are quite a few people we have crossed paths with in the last 12 months who have a very similar story .

I beg you to please consider leaving the status quo ...OPTION ONE ... are there really anymore complaints in this area of medicine than in the conventional areas ??? Are the complaints anymore severe ?? Surely patients should be given a CHOICE of treatment , especially when the orthodox methods do NOT work and unconventional ones DO ! Thank you for your time and I please urge you to reconsider any considerations you may have to change the current status quo .

Yours sincerely ,

[REDACTED] .

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 surgically induced menopause for the past 10yrs. This included feelings of anxiety and depression. Conventional medical doctors were not able to successfully treat my condition and bring me back to a satisfactory level of health. The one size fits all medication that the offered, didn't fit me!

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 a friend recommended to me that I see 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, and I have been able to maintain my health with ongoing treatment and visits.

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. This will also affect the many friends and colleagues that I have recommended my doctor too and are very grateful for the recommendation after feeling much better.

Yours sincerely and very concerned,

Name: [REDACTED]

[REDACTED]

Date: 4/4/2019

**From:** [REDACTED]  
**To:** [medboardconsultation](#)  
**Subject:** Public consultation on complementary and unconventional medicine and emerging treatments  
**Date:** Friday, 8 March 2019 8:01:15 AM

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Hi,

My name is [REDACTED] and I am 24 years old. I have had chronic health issues for the past 6 years.

When I first started getting urinary infection type symptoms I went to my local GP. They listened and gave me antibiotics. The problem kept coming back and although there was no sign of infection in my urine, they continued to give me antibiotics each time. I became so sick that trips to my local hospital and antibiotic drips were a regular thing. I had no answers, I was in pain and unable to live my life as an 18yr old. I was addicted to Endone and was on a concoction of drugs to help relieve the pain and discomfort I was suffering. I was unable to work and I was unable to live my life. It got to the point where dr's said that there was nothing they could do for me and treated me like a "drug seeker" because at that point the only drug that would ease the pain and provide relief was morphine.

I went to a specialising dr and after months of diagnostics was diagnosed with interstitial cystitis (most dr's don't know this chronic condition). All the prescribed medication provided to me made the symptoms worse or didn't help. My family and I were exhausted and I was anxious and depressed and didn't want to live anymore.

My mum recommended I see a naturopath. Well she was fantastic. She looked to the root cause of my problems best she could and provided me with more relief than any of the dr's were able to. Over the years iv been under the care of a homeopath and naturopath and have been able to work and be apart of society. The naturopath and homeopath can only do so much so even though I was a lot better and I still wasn't 100%.

I have now started to see an integrative dr who has been able to tell me more about my body then any one else. She has also shown me that it's not just one issue (the interstitial cystitis) but a range of issues within my body.

Other drs have told me that "there is nothing wrong with your body" and "it's all in your head" either that or "take this drug or that drug" only looking at my symptoms and not my overall health and as to why I'm having these symptoms and what's going on in my body to cause these issues.

If I hadn't found the integrative dr There is a high chance I would be dead or dying. She has discovered issues and reasons for my symptoms like no dr has before.

I no longer have much trust for normal drs. They are fine with simple cases but majority of issues there are underlying causes that drs just haven't been trained to pick up or know what to test for. I also think that drug companies play a massive role in conventional medicine. \$\$\$\$

I am grateful to be able to choose the type of health care professional that I want for MY body and shouldn't be subjected to what other people think is best for me. I should be able to make decisions for my health and seek what is the best option for me.

[REDACTED]



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**From:** [REDACTED]  
**Sent:** Saturday, 13 April 2019 7:57 AM  
**To:** medboardconsultation  
**Subject:** Feedback re Safe Medical Practice

Dear Sir/ Madam,

I wish to oppose changes or additions to the existing Code of Conduct 2014,as I believe they are more than adequate as they stand.

I am extremely satisfied with my current medical practitioner,as together we have walked a cancer journey using a combination of conventional & complementary medicine.I am now in better health than I have been at any other stage in my life.Rather than being old & a burden I am active volunteering & caring for grandchildren. I can self manage my health & my life.

I have already lost the ability to make claims using my private health cover & if complementary doctors & treatments are not available then the only option will be MBA approved mainstream doctors & their drug treatments. This is a violation of my rights & I object.

Yours Sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [medboardconsultation](#)  
**Subject:** Complementary Doctors  
**Date:** Thursday, 4 April 2019 4:55:04 PM

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To Whom it may Concern,

I am writing in response to the release of a Consultation paper that aims to redefine what is 'safe' medical 'practice' in Australia.

I currently attend an Integrative Clinic in my area and am more than happy with the treatment I receive. Other members of my family also attend the same doctor and are also happy with the treatment and support they receive.

I have always tried to avoid prescription medications if at all possible and I find the complementary side of the treatment has served me well over the years. My GP will try complementary treatment and if this does not work, she will turn to prescription medication. Having had some back surgery in the past few years, my Neurosurgeon advised that I would require further surgery and advised me to take strong pain killers. Instead I am now taking turmeric, silica and glucosamine along with stretching exercises which have all helped to allay my pain. I am now doing outrigger canoe paddling twice a week with no ill affects and last year was able to travel overseas twice with no pain on the flights nor any problems with the long walks we did. All this without having to take any prescribed medications.

I therefore object strongly to any changes that would de-regulate any medical practitioner who also uses complementary medicine or speaks in public about 'unconventional' practice of medicine.

I believe it is my right to choose my own doctor and be in control of my own treatment.

Yours sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [medboardconsultation](#)  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments  
**Date:** Friday, 28 June 2019 7:51:45 PM  
**Importance:** High

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I would like to respond to the submission both as a practitioner and a consumer.

I only see OPTION 1 as being the ONLY choice

I have been a medical practitioner for nearly thirty years and have seen the emerging changes in medicine and what patients want from their practitioners and the emergence of technology and personalized medicine and the inadequacies in the current medical model.

The current model and training in medicine is based on the acute disease diagnosis and treatment and is the way we trained and it is important to make us competent doctors for acute conditions.

We are trained and take our oath and majority of us practice accordingly and do no harm.

This acute model does not address the emerging burden of chronic diseases and is not economically sustainable as the cost is enormous not only in medications but all the rest like hospital stays procedures and spending majority of our budget on the aging chronically ill.

I believe the model for chronic disease needs to be based on health and function and we need to be asking the big WHY is this patient sick in the first place and what can be done to improve their health and their function.

We need to be competent in treating their acute conditions as we trained and much more so in preventative care as frankly most diseases are result of bad lifestyle and environment and genetic predispositions.

I would call this integrative medicine where all above is considered use all modalities to get the patient to a better function and I believe that is how integrative doctors work using their training skills to manage their patients and many have spend years of extra training gaining the extra knowledge to give this care and allowing patient choice of how they want to treated and educating them in prevention and taking responsibility for improving and maintaining their own health.

The ultimate results of this approach are less hospital stays, less medical procedures and less medications prescribed and happier and healthier patients and huge savings to the healthcare budget !!!!

I have personally utilized standard medical treatment and many outside which fall into the complementary or perhaps even emerging treatments and all I can say that it has been all for the better with no need to have any surgical treatment and very rarely get sick.

As an example I have bad osteoarthritis in my hip and THR was recommended which I did not accept and instead improved my lifestyle utilized exercise physio and acupuncture and have regular massage and more recent local accredited stem cell treatment resulting from this I have achieved 95% reduction in my symptoms and similar improvement of function and no need for medications!!!

In my practice I see many patients with similar results that have seen multiple practitioners and continued to be sick only to find things missed by other busy doctors practicing ten minute medicine who have no time to take a full history and ask the WHY is this person sick .

I would like to respond to the questions raised in the following manner:

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## Question 1

NO. I do not agree with the proposed term. Complementary medicine and unconventional medicine and emerging treatments are disparate issues. They have different, often contradictory, meanings, are used in different clinical contexts and circumstances. There are wide variations in safety, risks and costs. They are very broad and very difficult to define in a Medico-legal context.

## **Question 2**

The definition is poorly informed. These different style of practices should not be grouped together. There is no definition of conventional medicine offered nor is there any discussion on who would frame what would be considered conventional medicine.

## **Question 3 and Question 4**

This document has lack of data, and provides examples which are able to be handled within current guidelines. Real data and facts are needed to make a case for extra regulation. This document does not do that.

## **Question 5**

All medical practitioners are heavily regulated in every aspect of medicine. There is no argument made why the board considers there needs to be further regulation.

## **Question 6**

When the Board defines with clarity issues they are concerned with, then consultation with Colleges and Peak Bodies across all medical spheres is recommended. No guidelines should be implemented which discriminates one form of medical practice against another.

## **Question 7**

Application of option 2 would create an administrative nightmare for the doctors targeted and would therefore increase cost to the patient and limit patients' choice.

## **Question 8**

There is no need for additional guidelines. These proposed guidelines create confusion.

## **Question 9**

These guidelines should be discarded as there is inadequate evidence

for option 2.

**Question 10**

This question is poorly framed. Consultation is required with the relevant Colleges and Peak Bodies prior to development of any consultation paper around increased regulatory guidelines.

**Question 11**

Option 1 is the only choice.

All in good faith and hope the final outcome will be for the best for us hard working doctors who want more for our patients and maintaining the freedom of choice for all us in the current evolving medical care where more we know and learn the more we realize how much we don't know of the complexities of the mechanisms involved in maintaining healthy human function and that the answers are not found in a pill.



[REDACTED]  
[REDACTED]  
6/27/2019

The Medical Board of Australia

**Public consultation on clearer regulation of Medical Practitioners who provide complimentary and unconventional medicine and emerging treatments**

I have read the summary that you published along with the discussion paper.

Of the two alternatives you mention I prefer alternative one (no change) for the following reasons

- 1        You have not given a definition of “conventional medicine” and my experience is that “conventional medicine” seems to be whatever is promoted by the large pharmaceutical companies. I realize that I am cynical, however my wife many years ago was prescribed Valium in order to cope with her post-menstrual-tension (earlier on she used to throw saucepans, but she managed to control herself later). She refused to take Valium and on the advice of a friend (who was a veterinarian’s wife) took vitamin B6, which solved the problem. A friend, who is a physician, told me that 80% of their work is taking people off oversubscribed pharmaceuticals.
- 2        At the age of 7 (1954) a local country doctor who had a wide range of experience in London (UK) told my mother to be prepared for young [REDACTED] (me) to die as there was nothing medically that could be done for me. In desperation my parents took me to see a [REDACTED] minister in [REDACTED] (Rev. [REDACTED]) who had taught himself chiropractic by practicing on sheep. After the first visit my circulation had improved to such an extent that it was obvious that I was not going to die. My mother (a midwifery nurse) took me back to the Doctor and demanded an explanation. He explained that my mother had obviously taken me to be treated by a “quack” and had he recommended such a course of action he would have been struck off the medical register and no longer allowed to practice medicine.
- 3        My family has had good success with the moderate use of vitamin supplements at no cost to the government.
- 4        I do not trust you, and yes, I do have shares in pharmaceutical companies.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 28 June 2019 2:42 AM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

To Whom It May Concern

**I choose Option 1:**

It concerns & really upsets me as a 62 year old Australian, that changes may be made to doctors practising in the areas of complementary and integrative medicine. And also the prescribing of off-label drugs may be ceased or restricted.

I have had a serious, extremely disabling, chronic disease for 24 years (since May 1995), and I can honestly say that without the help of integrative doctors and naturopaths, I would be a lot, lot worse today than I am. They have given me the time needed to take thorough medical histories, hear the long list of symptoms (which are constantly changing), listen to my concerns, prescribe supplements and diets which have helped enormously, and made my life bearable, whereas it wasn't before consulting with them.

Normal general practitioners, and specialists, do not spend the time needed when one has more than one issue or symptom, whereas integrative doctors and naturopaths spent MUCH more time with you. This is HUGE, and means the difference to life being utterly miserable, and feeling incredibly lonely in this disease; to feeling heard, validated, and helped by their very broad knowledge and holistic approach. The fact integrative GPs are fully trained doctors as well, means I get to have the best of both worlds - traditional

medicine and what it has to offer (which is little for my disease), and integrative medicine which has helped me enormously. I have Myalgic Encephalomyelitis (sometimes called Chronic Fatigue Syndrome), and traditional medicine can offer no treatment. Whereas integrative GPs look at each symptom and work on that - for me, as said before, it has made a huge difference.

Another important point is that my normal (traditional) GP has prescribed an off-label drug that is used in VERY low doses, (endorsed by some researchers), which has helped me, and many others I talk to with the same illness, with inflammation and pain. It is not a cure, but it has helped a LOT!!! Because of the low dose (it works in a different way in a low dose to the standard dose), I have to have it compounded at a special compound pharmacy. Another instance where I

have been prescribed off-label medication is from my Neurologist. He has prescribed an old-fashioned type tricyclic antidepressant - not because I am depressed, but for pain, especially nerve pain. They've found it can help patients with problems other than being depressed. If the government or medical board were to stop doctors prescribing drugs off-label, myself, and many, many others would be adversely affected. It would mean the difference between having the pain I now have, which is bearable (just), to be in absolute agony, and actually crying and writhing in pain.

Please hear the patients' pleas to leave things as they currently are - **Option 1**. I have included what is below, because I agree with it:

**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 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.

As stated before, PLEASE leave things as they currently are.  
Thank you for allowing me to have input into this very important issue.

Sincerely

[REDACTED]



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**From:** [REDACTED]  
**Sent:** Monday, 8 April 2019 10:04 PM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments  
**Attachments:** [REDACTED]

To whomever it may concern within the Australian Medical Board,

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

I have been suffering from anxiety and depression for the past 20 years. It is only since seeing an Integrative medical doctor since 2014 that I have begun to feel significant relief from my symptoms. Conventional medical doctors have not been able to successfully treat my condition and bring me to a satisfactory level of health.

I believe that Pharmaceutical medication has only masked my symptoms and wasted Medicare funds and resources. My Integrative doctor has included lifestyle and diet change, and introduced supplements of vitamins and minerals to address my problems and my condition has significantly improved.

If I can not see an Integrative doctor, or that Doctor is restricted in what he or she is able to prescribe for me, I believe that my health will deteriorate and have a negative impact on my family, my work, and my well being.

I urge you to please allow me freedom of choice. It is my body and I want to be well, healthy and happy. My family and the people around me deserve the very best of me.

Concerned,

[REDACTED]

08/03/2019

Warm Regards, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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**From:** [REDACTED]  
**Sent:** Tuesday, 5 March 2019 2:50 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: ME/CFS, Fibromyalgia, Hypothyroid, Copper Overload, Undermethylation, Borderline Secondary Adrenal Insufficiency and high pyrolles.

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 am now functional, I was not before, I am working regularly again for the first time in a few years, I am concerned that if cannot continue to see integrative doctors and allow them to treat me as I am now being treated my quality of life & my ability to maintain a job will be severely impaired as it was before.

Concerned,

Name: [REDACTED]

Signature: [REDACTED]

Date: 05/03/19

Occupation: Business & Management Trainer

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**From:** [REDACTED]  
**Sent:** Friday, 7 June 2019 9:59 AM  
**To:** medboardconsultation  
**Subject:** Consultation on complementary and unconventional medicine and emerging treatments

As a parent of a person with a chronic illness not recognised by the Medical Board of Australia, I wish to express my concern with regard to the proposed changes to the "Board's Good medical practice: A code of conduct for doctors in Australia", on the grounds that "practitioners who provide complementary and unconventional medicine and emerging treatments" are already adequately covered in the current guidelines and that any supplementary, practice-specific guidelines would in fact be open to misinterpretation and provide scope for discrimination towards these complementary practitioners. My opinion is based on years of personal experience of discrimination and negligence under registered doctors, but not by those practicing complementary integrative medicine. (The integrative and complementary therapies they provide have been the only medical care that I believe have saved my daughter's life.) My experience shows clearly that the interpretation of duty of care to a patient is clearly lacking under current guidelines, so if you are planning to change these guidelines then any new code of conduct should include all doctors. The Code of Conduct seems to only protect the conventional doctors, not the complementary ones, and not the patients for whom these guidelines were designed either.

I would like to know what published body of evidence there is to make changes to these guidelines in the first place and to create additional practice-specific guidelines. The guidelines should be more inclusive, not less, and should be the same for all health care professionals.

Forgive me for not providing details of my personal experiences, but I am so weary of providing these details over and over again to doctors who are too scared to act on this information. Gagging health care professionals practicing conventional or complementary medicine will not silence the public on this issue.

Regards,

[REDACTED].

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**From:** [REDACTED]  
**Sent:** Thursday, 27 June 2019 11:43 AM  
**To:** medboardconsultation  
**Subject:** Integrated Medicine  
**Attachments:** [REDACTED]

Dear Sir/Madam

I am writing as it has been made aware to me that there are proposed new guidelines for complementary and unconventional medicine.

After many, many years of unsuccessful treatment via the 'conventional medicine' route, I have finally found solutions that work via integrated medicine which takes into account all the different aspects of the human physique rather than focussing purely on test results and 'disease'. There was nothing 'wrong' with me as far as general medicine was concerned but I felt so unwell that I could barely function.

Please consider how many people like myself may never find a solution to their unwellness if your guidelines restrict integrated medicine to the point where practitioners find it too difficult to practice.

These are the points that I have been made aware of by my integrated medicine contact.

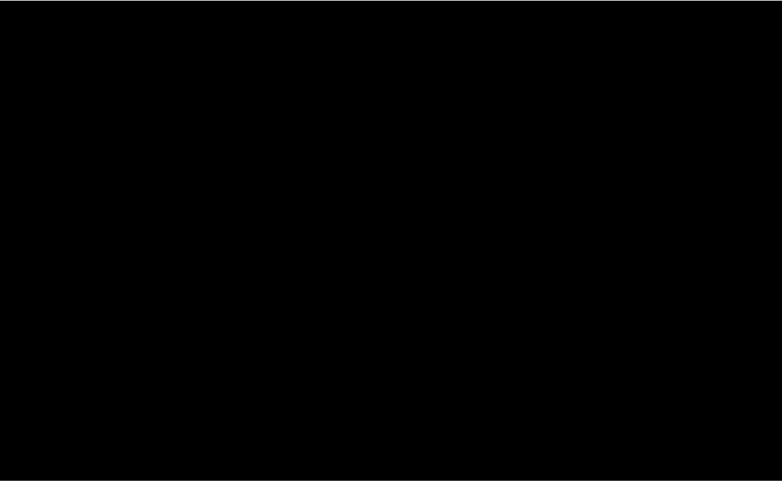
- The grouping of integrative medicine with 'unconventional medicine' and 'emerging treatments' may create the impression of being "fringe" rather than evidence-based
- That many of the terms used in the rationale such as 'unconventional medicine', 'inappropriate use' and 'emerging treatments' leads 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

Also note, it was through integrated medicine and compounding labs that I was able to very slowly and successfully come off antidepressants, the approved medicine that served its purpose but really was not the 'cure' that general medicine wanted me to believe it was and led to side effects that added to my woes.

Thank you.

Kind Regards,

[REDACTED]





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

To whom it will concern,

I am imploring you to not only make a place for integrative medicine and practitioners but to encourage your interested members and peers to undertake the further studies required to practice as they do.

I have both worked for and been treated by an exceptional integrative GP who took on many years of extra academic study to serve her patients. Driven by her desire to support and heal patients with complex metabolic, systemic illnesses, she offered skilled and compassionate care to us, harnessing both classical medical and complementary approaches and quite frankly, offered and delivered on a hope for wellness that those not trained in this way could not. Having been in the privileged position of being on her staff too, I have observed she has also experienced significant unwarranted resistance from other medical professionals which has been very sad and created a less than positive impression of the approach and leadership of your professional bodies.

Please please put the welfare of these often chronically ill people at the forefront and encourage those who have the commitment and passion for their patients to study and practice in this way.

I am surprised that these dedicated medical experts are being placed under such pressure and discouragement. Please do the opposite and promote these medical and complementary health endeavours, discouraging hostility and lauding the efforts of those with the courage to pursue them.

We need more!

Thank you for hearing me

[REDACTED]

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Warmly,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, 16 April 2019 2:25 PM  
**To:** medboardconsultation  
**Subject:** 'Public consultation on complementary and unconventional medicine and emerging treatments'

It is greatly disappointing that conventional medicine seeks to limit people's choice in health care. The conventional system has failed my wife and finding a practitioner that practises functional medicine has been critical in our journey toward healing. Her diagnosis has a name, has an unfunded test, has a treatment protocol, is studied and published widely in the literature but is almost unheard of in conventional mainstream gastrointestinal medicine in this country. How do you expect people to get better if you remove the alternative. What happened to freedom of choice?

Your focus should be directed at the obvious harmful prescribing practises of general medical practitioners in this country who are harming the population and servicing the vested interests of large pharmaceutical companies. Why does the national prescribing service have to coach GP's to stop over prescribing PPI medication? Seems very reminiscent of valium over prescribing lead by poor pharmaceutical company product information. What about the recent article in the Age newspaper highlighting the unconscionable conduct of [REDACTED] in marketing [REDACTED] aggressively to the detriment of many and at great cost to the public purse.

Many nutritional supplements and herbs used in complimentary medicine are far safer than pharmaceuticals and there is no subsidy. Shouldn't you be grateful people are paying for there own treatment?

Stop the Spanish inquisition. Our population is both very unhealthy and sad. 15 minute script pad medicine has failed miserably. Change your focus to working out why conventional medicine is achieving such poor outcomes.

It is hard not to be cynical and believe that this is an attempt to kill of competition and drive people back to the lame system we are currently stuck with.

To the Medical Board of Australia.

To whom it may concern,

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 using an integrative doctor and they have improved my life. Before I was under the care of this integrative doctor my health did not seem to be well managed. My symptoms of tiredness, hot flushes and brain fog impacted my life significantly.

To get approbative care has been an interesting experience as I can get personal attention and see a doctor who is willing to listen to me. When seeing a regular General Practitioner I feel that they stand a distance away from me and diagnose a sore throat from across the room.

My health has now been transformed and I feel that I have become a normal person that can do all the things that I want to do with the least amount of drug intervention.

Having my choice of medical care is important to me as it is my body so it should always be my choice. I am an older person and I have a lot of life experience. I have finally found a form of medical care that is personal and right for me, I take less drugs and feel that I have control of my health.

Regards

A black rectangular redaction box covering the signature area.

## **Submission to the Public consultation on complementary and unconventional medicine and emerging treatments**

Thank you for the opportunity to have input to this very important topic.

### **I am a patient**

'Complementary' medicine has made an unbelievable difference to my life and health.

My main area of concern is treatment areas that include nutrition, 'neutraceuticals', bio-identical hormones, supplements etc.

I consider the term 'complementary' to be a misnomer and regard a lot of what is considered to be 'complementary' to be focused on the use of non-drug methods of healthcare.

As treatments using 'natural' products cannot bring in good incomes for big pharma, there is less money to investigate these treatments, hence fewer scientific studies proving efficacy.

That does not mean the treatment is less effective – just that no one has done a study on it.

### **When does the designation of a treatment change from 'complementary' to 'mainstream'**

What processes will be put in place to review the guidelines as to what is 'mainstream' and what isn't?

Historically, practises / beliefs that were thought to be incorrect or ineffective have now turned out to be correct and effective. Where do we draw the line and when?

Many drugs and procedures that were considered 'mainstream' and accepted practice are no longer so and have been shown to be ineffective or harmful.

An example of the above is the treatment of stomach ulcers which was considered to be caused by high acid and is now understood to be caused by *heliobacter pylori*. The doctors at the forefront of that discovery were ridiculed and not believed. Even after proof, prescribing practises by doctors were very slow to change.

It is vital that patients have access to, and practitioners are able to offer, treatments that may be considered 'unconventional' just so that science, knowledge and best-practise can be advanced.

It is also vital that any regulation of 'complementary' medicine includes adequate education of 'mainstream' medical practitioners as to what has moved from the realm of 'complementary' to 'mainstream'

## **Listen to the people**

Mainstream medicine is failing people. If this were not the case then there would be no demand for 'complementary' medicine.

Regulating Australia medical professionals will not reduce the desire of the general Australian public to have access to 'complementary' health professionals.

The alternative to 'complementary' health practitioners is Dr Google and online stores that dispense advise and medicines with no prescription or supervision. People will still seek these treatments. It is therefore essential that this industry is regulated in a reasonable fashion to allow it to flourish in a safe and cost-effective fashion, rather than driving it and patients underground and to the internet for their medicines.

Rather than restricting or otherwise tightening regulations on the use of complementary methods of healthcare, I would like to see more inclusion of these methods in the current education of doctors and other healthcare professionals.

For example, I find that in general doctors have very poor understanding of good nutrition and that this should be a much larger part of their training, especially given that they regularly offer dietary advice.

## **Conflicts of interest**

Large pharmaceutical companies have a vested interest in making sure that the 'mainstream' treatments involve drugs so that they continue to make an income.

One case in point is SSRI drugs. The drug trials for these show a tiny improvement compared to placebos and trials that do not show a benefit of the SSRI are frequently suppressed. Yet this is considered to be 'scientific' evidence.

There is very little education of doctors in alternatives to an SSRI script, and there is a large amount of money spent (by pharmaceuticals companies) on educating doctors that the SSRI script is the only answer.

## **My circumstances**

I have several health issues, the main one being poor digestion since birth.

'Mainstream' medicine has completely failed me on this. A specialist gastroenterologist advised that the 'cure' or 'solution' was to take 'Zantac' which is a drug that lowers stomach acid. As this reduced the symptoms for me, I was happy to take it and having no other knowledge of medicine at that time believed the specialist when he assured me that it was 'very safe' and there would be no ill effect from taking it long-term.

After 10 years on Zantac I was extremely unwell and no doctor could find any causes. Thankfully I found a GP who also had an interest in integrative medicine, who knew to order a stool test (only available overseas at that time and not considered 'mainstream'!). This showed an overgrowth or pathogenic bacteria and parasites, which had flourished due to the low acid conditions in my stomach.

Other testing showed several nutritional deficiencies caused by poor absorption and digestion – a direct result of the low stomach acid effect of Zantac.

This doctor prescribed what was necessary to kill the bugs, helped me wean off the Zantac and other strategies to improve my health and digestion, including nutritional and herbal supplements

On important supplement being 'hydrochloric acid' (betaine hydrochloride) to INCREASE my stomach acid. Low stomach acid was the problem all along. This is STILL not recognised by mainstream medicine.

I live in absolute fear and terror of changes to regulations which would mean I could no longer purchase the betaine hydrochloride. **My life would not be worth living in that situation**

### **Direct quotes from the position statement**

1. Harm may occur directly from the treatment resulting in an adverse outcome

This applies equally as well to drug and 'mainstream' surgery treatments and I would suggest more so in the case of 'mainstream' interventions.

2. Treatment and therapies may also have no effect, the benefit may be uncertain, or the effect may potentially be harmful

Again this also applies to 'mainstream' treatments.

3. Concerns about the cost and exploitation of patients are more commonly raised by other parties; patients don't tend to complain about the cost.

I would suggest here that the 'other parties' are parties that stand to lose financially if patients use 'complementary' treatments. To me this sums up the opinion of consumers to complementary medicine:

**The public want access to complementary medicine and they are prepared to pay**

**Please do not reduce or restrict any therapies or treatments that are currently available.**

██████████

29/6/2019

I wish to make a statement in support of Integrative Medical Practitioners and provide my personal case study that demonstrates my life was saved by such a practitioner having been failed by the 'conventional' medical model.

I have been a Registered Nurse working in major metropolitan hospitals for 43 years. In 2004 when I was 47 years of age and entering menopause I consulted my General Practitioner (GP) with tiredness, insomnia and poor concentration. I was ordered blood tests for female hormones but no further investigations were suggested and my GP prescribed Premarin (oestrogen sourced from pregnant mares under very cruel conditions) with no discussion about potential side effects. I felt no improvement after taking HRT for 3 1/2 years so I ceased it. Unfortunately I did not check the MIMS before taking HRT so I was unaware of the link between uterine cancer and unopposed oestrogen in women who have a uterus.

In 2008, when I was 3 years post menopause I consulted my GP due to an ongoing vaginal discharge. I was advised it was just hormones and to use an acid vaginal gel which I did for another 12 months while the discharge increased. In 2009 my sister informed me about an Integrative Health doctor that she had been very impressed with and so I made an appointment to see her about an injury I had sustained while horse-riding. I was quite amazed when she looked at me and told I was hypothyroid as she could see a mild goitre and other symptoms that were known to her. Blood tests confirmed that I had Hashimoto's disease with very high antibodies. No doubt this was the cause of my previous symptoms which were never investigated by my former GP prior to prescribing HRT. I was surprised that this first visit consisted of a very comprehensive history which I had never encountered in a doctor's visit beforehand. As I was about to leave the office I mentioned the vaginal discharge to the doctor who immediately said 'post-menopausal + vaginal discharge, needs an ultrasound. Within 1 week I was diagnosed with a highly malignant uterine carcinosarcoma. When I read the MIMS which I should have done before taking Premarin I became aware of the link to unopposed oestrogen. Taking HRT was the only listed risk factor that I had for uterine cancer. I was never warned of or screened for this, and when I consulted the GP with what I now know is a common symptom of uterine cancer I was told it was hormones and no investigations were suggested.

I was told by the Oncologist to whom I was referred that if I had chemotherapy and radiotherapy I would be 'cured'. (Those were his words) However when I requested information about the tumour it was clear this was not the case. For some reason Oncologists think it is ok to mislead patients, perhaps to give us false hope but it is not ok as it prevents us from being able to make a truly informed decision about our treatment options. The paper I was reluctantly given after further requests stated that 60% of women with carcinosarcoma developed metastasis within 12 months. The long term prognosis was very poor. When I asked for evidence to support the recommended treatment the only 'research' he could provide me with was a peer review of chemotherapy combinations. I therefore undertook my own research and found there was no evidence that demonstrated an improved outcome with chemotherapy for uterine cancer. Morgan G, 2004 states "*Uterine Cancer. There is no evidence that cytotoxic chemotherapy improves 5 year survival*". I accepted surgery and rejected chemo and radiotherapy. Having worked as a nurse and been involved in medical research for over 40 years I could not consent to such a toxic treatment that was not evidence based and conducted by legitimate independent research. I sadly found that independent and factual medical research is very hard to find in this day of corruption and fraud.

I am now 10 years cancer free having utilised treatments founded on evidence and good sense. I explored every option that was available to me and I worked a second job to pay for them. I could have had \$50,000 of chemotherapy at no expense to me. Why would I have chosen a treatment regime at significant personal cost if there was any chance the conventional model would have worked for me? Many of what is called alternative or emerging treatments are part of mainstream treatment in other countries. The legitimate ones have none of the side effects of toxic chemotherapy and radiotherapy. Of course people need to be careful of dishonest people selling untested miracle cures but that should be adequately controlled by current regulations.

I am also concerned about the increasing restrictions being placed on and subsequently increasing cost of compounded pharmaceuticals. I use compounded thyroid replacement for my Hashimoto's disease at a significant

personal cost as I have tried thyroxin and it does not work for me. The natural replacement was in use long before thyroxin was invented. I cannot understand why there are so many restrictions placed on the prescribing of compounded medications when I see and administer medications in my work every day that have very significant side effects. People should have the right to make choices about her health.

I have no doubt that I would not be alive today if I had not seen the Integrative Health doctor when I did, and if I had consented to chemotherapy as I have chronic neutropenia. I should add that at no time did my Integrative Health doctor dissuade me from chemotherapy or radiotherapy or influence me in my choices. I was supported in my health whilst carrying out the treatment options that I had selected after my own careful research. Intravenous vitamin C was one of the many treatments that I decided upon. Fortunately I was able to self-administer this which greatly reduced the cost and inconvenience and I have continued to work with the only cost to the health system being my blood tests.

Working in major hospitals for over 40 years I have seen the many amazing advances in surgery and diagnostics but I have also seen a lot of harm caused. A major concern to me now is the focus on treating symptoms alone, not the patient, with little or no attempt to identify the cause of the symptoms or the illness. There is an over reliance on medications to treat symptoms without looking for or treating the cause. This is at a great cost to individuals and the health system. I see people admitted to hospital all the time with polypharmacy complications that should not happen with adequate primary care.

I believe there are enough checks in place to protect the public from unsafe and harmful doctors. I believe most doctors are caring, highly educated professionals who are working in a system that dictates 10 minute consultations which does not allow them to do their job properly. In most cases people turn to alternative/complementary/emerging therapies when conventional medicine has failed or harmed them. It is usually at great personal expense so I don't believe anyone makes these choices lightly and I don't believe these choices should be taken away from them or limited any further. Integrative Health doctors are, like all doctors governed by the same regulations and obligations but they have undertaken additional training and embrace illness prevention, lifestyle improvements and good nutrition. Surely this is what medicine should be about and can only improve health and reduce costs in the long term. Prevention is always better than cure. These doctors should be supported for their dedication to provide comprehensive health care. It would be much easier and financially beneficial for them to follow the traditional model of 10 minute consultations prescribing a medication for every symptom.

My former GPs prescribed a medication with a known link to uterine cancer and without investigating other potential causes for my symptoms. I was not warned of potential side effects or complications. When I presented with symptoms of uterine dysfunction they did not undertake any investigations. They are still practising!

Sadly the integrative Health doctor who saved my life is no longer allowed to practice. I have referred many friends to this doctor. They are people who have been failed or harmed by 'conventional' medicine. They have all been helped significantly by the integrative model of care and like me are devastated that this holistic care is now threatened by the very organisation that should be embracing it. \

As a final point I was disappointed that this debate has not been well publicised and that the comment website was difficult to find.

Reference

Morgan G. et al 2004 'The Contribution of Cytotoxic Chemotherapy to 5 year Survival in Adult Malignancies': *Clinical Oncology* Vol 16, pp. 549 - 560

Yours sincerely



[REDACTED]

Cc     Mrs. Rebekha Sharkie MP : Member for the Federal Seat of Mayo, SA.  
       Mr Stephen Wade: MLC. Minister for Health and Wellbeing  
  
       Mr Chris Picton: Shadow Minister for Health and Wellbeing

# The contribution of cytotoxic chemotherapy to 5-year survival in adult malignancies.

[Morgan G](#)<sup>1</sup>, [Ward R](#), [Barton M](#).

[Author information](#)

## Abstract

### AIMS:

The debate on the funding and availability of cytotoxic drugs raises questions about the contribution of curative or adjuvant cytotoxic chemotherapy to survival in adult cancer patients.

### MATERIALS AND METHODS:

We undertook a literature search for randomised clinical trials reporting a 5-year survival benefit attributable solely to cytotoxic chemotherapy in adult malignancies. The total number of newly diagnosed cancer patients for 22 major adult malignancies was determined from cancer registry data in Australia and from the Surveillance Epidemiology and End Results data in the USA for 1998. For each malignancy, the absolute number to benefit was the product of (a) the total number of persons with that malignancy; (b) the proportion or subgroup(s) of that malignancy showing a benefit; and (c) the percentage increase in 5-year survival due solely to cytotoxic chemotherapy. The overall contribution was the sum total of the absolute numbers showing a 5-year survival benefit expressed as a percentage of the total number for the 22 malignancies.

### RESULTS:

The overall contribution of curative and adjuvant cytotoxic chemotherapy to 5-year survival in adults was estimated to be 2.3% in Australia and 2.1% in the USA.

### CONCLUSION:

As the 5-year relative survival rate for cancer in Australia is now over 60%, it is clear that cytotoxic chemotherapy only makes a minor contribution to cancer survival. To justify the continued funding and availability of drugs used in cytotoxic chemotherapy, a rigorous evaluation of the cost-effectiveness and impact on quality of life is urgently required.

### Comment in

- [The contribution of cytotoxic chemotherapy to the management of cancer](#). [Clin Oncol (R Coll Radiol). 2005]

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**From:** [REDACTED]  
**Sent:** Monday, 18 March 2019 7:59 PM  
**To:** medboardconsultation  
**Subject:** Public consultation paper: complementary and unconventional medicine and emerging treatments

Hello,

Thank you for opening this up for the public.

I use compounded medicine to treat a health condition, as does my husband and my mother. We have found that the compounded medicine along with other advice from our Doctor has provided us with a better outcomes rather than the 'usual' treatment that is prescribed.

I do not support this paper or the recommendations to place any kind of restriction on GPs who have done further study, or are able to provide advice that isn't mainstream and run of the mill. Integrative GPs, in my experience, have cared far more than standard GPs.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 14 March 2019 11:38 AM  
**To:** medboardconsultation  
**Subject:** Integrative Doctors' right to prescribe

To whom it may concern:

I am alarmed to hear that you are proposing to limit and control what Integrative Doctors are permitted to prescribe, thereby controlling and monitoring their practices.

I have been fortunate enough to have been assisted by Integrative Doctors in recent years, with great success and improvement to my health and well-being. If it were not for the intervention of my current Integrative Doctor mid last year, I could well have died due to a condition not recognised by, tested for, or even known to, the regular GPs at my erstwhile medical centre. Thankfully due to her intervention (initiated on my first consultation with her), tests were carried out which resulted in the detection of a near fatal but luckily curable lung condition, and its subsequent treatment by a leading Professor of the Hospital at which the tests were effected.

My subsequent, long-term, recovery has also been greatly assisted by the Integrative Doctor's timely prescription of supplements which reduce the side effects of the specialist's prescribed medication. Such supplements and advice regarding their role, as well as other measures for rehabilitating my body, are quite obviously unknown to regular GPs, which is quite a shame in itself. To his credit, the specialist has recognised the sagacity of the Integrative Doctor's advice.

I see the proposed control of Integrative Doctors' ability to provide superior advice and prescribe suitably effective medications and supplements as a denial of my rights to obtain effective treatment, as it will be for thousands of other patients. In my view it will also hinder the practices of a worthy section of practitioners who have actually taken the time and effort to gain superior knowledge and accreditation in their chosen field, compared to what my experience over the past 79 years has indicated to me to be that of the majority of general practitioners. I therefore request that your proposed restrictions be reconsidered and abandoned, in the interests of the health and wellbeing, as well as the freedom of choice, of the general public of this country.

Yours faithfully

[REDACTED]

My name is [REDACTED], 66 year old male.  
Email: [REDACTED]

The implication by the Medical Board of Australia that doctors practising Integrative Medicine pose a risk to their patients is badly misplaced. Rather, the risk to patients is the proposed barriers to choice that the MBA is pushing. We should not be penalising Integrative Medicine practitioners, we should look to their careful practices and processes as the future of patient care. History may not be kind to the narrow, fearful viewpoints proposed by the MBA in respect of Integrative Medicine practitioners.

I came to an Integrative Medicine practitioner on a personal referral with what had been difficult to diagnose extreme fatigue symptoms and severe gut issues. A string of GP's basically shrugged their shoulders, giving up and suggesting I was simply getting older. Another non-medical practitioner went a small part of the way to diagnosis but was not equipped to go further. I felt half dead and slept a lot after very brief exercise.

The Integrative Medicine practitioner, through accurate questions and appropriate tests, identified multiple issues. They provided useful, detailed relevant reading matter.

We implemented diet changes and commenced medications, supplements, ran a detox program, and commenced appropriate monitoring.

Rather than simply wallpapering over the issues, the treatment and associated strategies were set up as successful long term preventative protection.

The positive effects came quickly. After three months I felt better than I had in years and was a useful 10 kg lighter. After twelve months just about everything in my life was better and I attribute this to the program and the interest instilled in me to follow the program.

Now four years down the track and at 66 years of age I feel like a new man. I walk 8-10 km a day, do a 90 minutes gym session three times a week plus a high intensity 30 minute exercise bike workout 2-3 times a week without fatigue. Where conventional medicine utterly failed me, the careful diagnosis and evidence based treatment from the Integrative Medicine practitioner has changed my life. Yes, it was expensive but clearly worth every dollar.

I am now a great deal happier, healthier, more productive in my small business, and importantly a much better husband and father that I was four years ago.

Influenced by my positive experience, my wife has also had great outcomes with her previously mismanaged symptoms following treatment with an Integrative Medicine practitioner. My niece, the mother of three young children and getting nowhere with management of the long term symptoms of Dengue Fever finally found solutions with another Integrative Medicine practitioner.

Please reverse the false perception that Integrative Medicine is higher risk than conservative medicine. As patients, the choice is ours.

[REDACTED]

## Submission

### *Consultation on Complementary and Unconventional Medicine and Emerging Treatments*

Thank you for the opportunity to offer feedback on your public consultation paper. I respect the Board's intention to protect public welfare by wishing to strengthen current guidelines for medical practitioners who provide complementary and unconventional medicine and emerging treatments.

However, I am strongly opposed to the move to implement Option 2.

At age 22 I was diagnosed with FSH Muscular Dystrophy. I was told that there was no treatment, but that research would provide an answer at some point in the future. That did not prove to be the case. I went to several doctors who practiced conventional medicine in the hope that they could guide me in the direction of physical therapies that would help slow the muscle wasting process but there was nothing they could offer. One doctor suggested that this effort was a sign that I was "in denial."

With nothing to lose, I began searching in different directions and explored alternative therapies. Feldenkrais, kinesiology, naturopathy, acupuncture and ayurvedic medicine were all explored along the way. They proved to be beneficial and even though I am in a wheelchair today, I am immensely grateful for the contribution that these therapies have made to my wellbeing and continue to do so. They offered benefits in increased mobility and a reduction in the discomfort associated with MD.

The biggest challenge with this condition is fatigue, to the point of being chronic. Trying to keep up with teaching was an ongoing challenge and eventually I left mainstream teaching and started a small tutoring business which eventually became a piano studio.

This eased the pressure but the debilitating fatigue continued.

Then I struck gold. I found a nutritional doctor who was extremely knowledgeable, researched the scientific literature to support her treatment protocols and was dedicated to optimizing whole body health. Fortunately, she was also familiar with the condition and understood how it operated. For the first time I discovered a doctor who monitored my health status at intervals and adjusted the supplement regime when necessary.

The reality is that I have gained strength and energy from the treatments and as the old saying goes, 'the proof is in the pudding.' Her long waiting list is testimony to her success as a dedicated health professional.

This leads to my first concern in relation to the Board's preference for Option 2.

There is NO VOICE represented by doctors practicing nutritional medicine on the board or given representation in your paper..

Your board is comprised only of conventional medical practitioners and those concerned with the law. I find this deeply concerning.

In a fair process, nutritional practitioners should be represented given the good they have to contribute to health treatment. This from the start indicates a bias for an orientation in the direction of conventional medicine, and, with the help of lawyers, ratifies changes in law which once put in place is extremely difficult to change, and can in many cases set a precedent for even more rigorous controls.

The definition you've decided on for Complementary and Unconventional Medicine and include an extremely vast body of healing approaches that the Board seeks to regulate. This is so wide reaching in general that I feel it allows too much latitude for control by one body in a country, which prides itself on freedom of choice. It also suggests that the difficulties the Board seeks to regulate lie only outside the domain of conventional medicine. Herein lies a problem.

In reading through the list of *Concerns About Therapies and Treatments Being Offered*, there is no mention of the fact that the reason increasing numbers of people are using unconventional medicine is because of the failure of conventional medicine to provide answers outside drug treatment, which also harbors significant dangers and side effects. See Harvard University article for one such reference:

<https://ethics.harvard.edu/blog/new-prescription-drugs-major-health-risk-few-offsetting-advantages>

And:

<https://newspunch.com/100000-deaths-per-year-in-the-u-s-caused-by-prescription-drugs/>

<https://health.usnews.com/health-news/patient-advice/articles/2016-09-27/the-danger-in-taking-prescribed-medications>

Surely patients have the right to avoid such dangers.

Having watched my own father die from the cocktail of drugs prescribed to him by a conventional doctor, resulting in liver failure, I have become increasingly wary of simply looking to drugs for a health solution.

These experiences are not limited to myself; they underlie the reason for the great migration of people towards complementary medicine and unconventional approaches. By becoming too restrictive on anything outside conventional medicine we run the risk of curtailing efforts of those seeking an opportunity to find successful alternatives that do not include drugs or other conventional methods they do not wish to employ.

There is a danger in allowing allopathic medicine to dominate the field in all areas of healing and to be seen as the only authentic option and to be the arbiter of what constitutes acceptable practice.

In knowing that the Board has the best of intentions in trying to eliminate dangers associated with unskilled practitioners, conflicts of interest and safety concerns with untested products and treatments, I also feel there is a great risk of blurring the lines between those practitioners and doctors like my own who may use certain alternative diagnostic tools and treatments that the Board may disagree with despite not falling into the categories above.

They too, are aware of the dangers mentioned above in regard to drug only treatments.

The differences that nutritional doctors and conventional doctors have, in my mind, fall into the category of professional differences of opinion and should be subject to scientific debate. More reason for the voices of nutritional doctors to be represented in this paper.

If regulations that limit these practices do occur, we have a problem for those of us seeking freedom of choice in our treatment if our practitioners are prevented from using those tools that they deem appropriate being removed. I have already seen this in action and been greatly inconvenienced by it, to the point that I now have no access to treatment. which is why I am writing this submission.

One of the concerns in your paper refers to the cost of alternative treatments. I would agree that some of them are very high and commercial interests motivate many. They will be even more so with the elimination of many alternative therapies from our private health cover. A move, which was made without consultation with private health contributors.

We also have to remember that standard medical treatment is also expensive but heavily subsidized by the taxpayer, so the cost is indirect. On top of that we have private health cover, which is expensive and then the Medicare Levy.

Many alternative therapies have helped many people regardless of whether the scientific community regard them as valid practices. In these areas there are disputes between professionals. It concerns me

that the argument will be decided by bringing the weight of the law in to silence dissenters.

There is no mention of the specific treatments and diagnostic tools you will be targeting. These do not appear in your discussion paper. Which areas would be included? Freedom of choice in treatment is paramount. If we start dictating and preventing people from choosing we are adding to an oppressive system that begins a journey towards a slippery slope.

One of the upsides of Alternative treatments is the time taken in consults in which the practitioner is able to develop a more in depth relationship with the client as in the case of my own doctor who spends between 40 and 60 minutes per consult. This is at variance with the conventional system and the standard 10 minute consult which invariably ends in a script and rarely addresses more than one issue at a time. I know from my medical friends that this is the most profitable way financially to deal with patients. A financial motive exists in both modalities.

If the Board were to regulate guidelines, presenting principles that allow an integrative approach would be far better than targeting just complementary medicine. The Discussion Paper does not have a fair balance, or representation of both sides in the equation. I believe the Board seeks to protect the public interest but embedded in the current proposal is a clear bias to protect conventional medicine as the 'go to' for authentic treatment. We need greater latitude and an admission that many of the pitfalls in complementary medicine also exist in the conventional system.

Option 2 has the great danger that it will violate the right to choose in a land where we value our democratic status and squelch the progress of emerging therapies and treatments that may be of immense help in healing in the future as they develop. We need more precise indications in your paper about who specifically will be targeted and which tools and treatments will be curbed, particularly if they are part of the current treatment regime and are proving successful with patients like myself.

Sincerely,

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



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**From:** [REDACTED]  
**Sent:** Sunday, 30 June 2019 3:06 PM  
**To:** medboardconsultation  
**Subject:** Support option 1, the current regulations

I believe the current regulations of medical practitioners who provide complimentary and unconventional medicine and emerging treatments (option 1) adequate to address the issues identified to protect patients.

I believe patient safety must be priority for all health care providers. All health care providers take a hippocratic oath, a personal pledge to do the most good and least harm possible for the individuals they treat. Unfortunately there will always be bad players that exist in the health care industry. It is unlikely greater regulatory power and oversight will do anything to stop the bad players. Of greater concern is the potential loss of freedom for the public to be able to choose the health care they desire based upon their individual values and beliefs. Rather than benefitting the public I see more regulation only hindering the public access to alternatives they may desire. More regulation only encourages the already strong allopathic bias inherent in the regulatory agencies away from things natural and towards an already heavily pharmacological dominated health paradigm.

When the medical board can adequately regulate themselves, then they can think about taking on more regulatory power. It would be of much greater benefit to the public if the medical board looked deeper into the currently "accepted Practices" that are fraught with their risk and visible harm. The problems inherent in the current health paradigm are to many too list here but I will sight a few of your examples listed in the discussion paper:

1. "Administrative Tribunal of Western Australia (2013)<sup>27</sup> – a specialist general practitioner was suspended and had conditions imposed for prescribing anabolic steroids without medical indication. This was appropriately handled by the board for someone illegally prescribing a steroid. How would increased regulation stop this? [REDACTED]  
[REDACTED] We have safe guards in place currently that were able to police these situation.

2. State Administrative Tribunal of Western Australia 2015- a medical practitioner with general registration was suspended for recommending treatment for a cancer patient which included intravenous administration of Vitamin C, Carnivora, and mistletoe extract. The tribunal had particular concerns in relation to:

- financial conflict of interest – the doctor providing the treatment was a director and shareholder in the company that sold the treatment to the patient
- providing treatment to the patient in circumstances when there was no evidence that the treatment would be effective."

It is unfathomable to imagine a medical professional incapable of identifying the potential healing effects of Vitamin C with cancer. Vitamin C is a powerful antioxidant. Allopathy decides that if it is not a drug based intervention then it is useless? It is interesting that the accepted treatment for cancer is radiation and chemotherapy that are also known to be carcinogenic and cause secondary cancers.

3. " Health Practitioners Tribunal of South Australia (2016)<sup>22</sup> – a specialist general practitioner was found to have engaged in professional misconduct for providing a nutritional and detoxification program for a terminally ill patient when there was no reasonable expectation of benefit."

First of all this is a terminally ill patient, shouldn't they be given the opportunity to try what they want to potentially prolong their life or possibly even heal? Who gets decide this intervention is not going to be beneficial? Does the same limited medical model that told this individual they were going to die of cancer also get to decide that this intervention they did not try was useless?

4. Victorian Civil and Administrative Tribunal (appeal) (2016)<sup>29</sup> – a specialist general practitioner had conditions imposed following concerns about his use of homeopathic medicine and his prescribing practices, especially in relation to antibiotics for Lyme-like disease.

This is a topic I know extremely well as I have a child with Lyme disease. If it was not for an integrative medical specialist, she would not be as well as she is today. The traditional allopathic medical practitioners are in the dark when it comes to handling Lyme. They failed us.

Issues involved with adopting Option 2, (Increased Regulation)

1. Little evidence of harm for most CAM interventions.
2. This will create more regulations in an already heavily regulated medical system.
3. There would be a greater potential for already narrow pharmacological bias, towards practice.
4. This will restrict practitioners freedom to practice the art of medicine based on individuals clinical knowledge and experience.
5. This will restrict consumer freedom to choose the healing path of their desire.

I vote Option 1.

Respectfully,

[Redacted Signature]

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## **Provision and use of complementary and unconventional medicine and emerging treatments**

Freedom of choice is a right that all citizens are entitled to. It is a basic human right that we are able to access the wealth of knowledge, experience and practices used within what is called integrative medicine and complementary healthcare. This is especially true when the “conventional” medical system is failing us. Using labels of “integrative”, “complementary” “alternative” serve to dissociate members of the medical establishment into separate groups, when in reality they are all bound by the Hippocratic Oath in their service to the public.

I have had a chronic condition for over 18 months. In that time I have seen 6 local GPs, where it was necessary to use double-time consultations due to the complexity of my condition. None of these GPs have been able to diagnose me in order to prescribe treatment.

When my time-poor GPs failed to diagnose me, I chose to see an “Integrative” doctor. My first appointment was over an hour and a half long where I had time to describe my plethora of symptoms, and where he could analyse previous blood tests, scans and procedures, assess my medical history whilst also determining further testing and treatment that he considered appropriate.

My “integrative” doctor is a highly experienced, highly trained specialist in his field of chronic and complex conditions, with a high success rate of treating people like myself – he came highly recommended. Pharmaceuticals and herbal supplements are the tools of his trade, and which he chooses to use is based on his own research, judgement and experience from daily interaction with patients. I trust him implicitly and highly value his holistic, proactive and investigative approach.

I regularly use “complementary” practices such as acupuncture, for immediate pain relief (3000 years of TCM surely can't be wrong?). I use herbalists and naturopaths for similar reasons: herbs have been used successfully for thousands of years, with increasing confirmation through contemporary evidence-based studies. I choose to see osteopaths and chiropractors, each time with immediate relief from physical discomfort. My physiotherapist adds acupuncture to his treatment because he knows it works.

The current Code of Practice already addresses all safety and efficacy issues related to Integrative Medicine. Nit-picking within the Guidelines, because of individual cases, is not conducive to a united and trusted medical establishment. In my humble opinion, practitioners need less restrictive regulations not more, in order to keep up with current global practices, advanced studies and the latest treatments. Restriction serves as a ball and chain around potentially progressive Australian medical practice.

Please make no changes to the current 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]  
[REDACTED]  
[REDACTED]  
24/07/2019

Executive Officer  
Medical  
AHPRA  
GPO Box 9958  
Melbourne 3001

Dear Executive Officer:

I am writing in regards to the proposed strict new regulations governing the practice of "Complimentary and Unconventional and Emergency Medicine". I have personally used Complimentary and Unconventional Medicine for years now and can testify to its unrivaled value to my health and wellbeing. My doctors have always provided discussion about options of treatment and their relative merits and potential problems. I think it is a really poor decision to base these drastic changes on the standard of care from a very few practitioners, with these complaints being no more frequent, and generally with less severe outcomes, than complaints against other modalities of medical practice.

In addition to my experience, my brother has recently been treated for a tick-borne disease using both conventional and integrative approach, with the integrative approach actually being responsible for his improvement and getting his life back.

I think all Australians value free choice in making our own decisions over our medical treatment... are we not the land that rejoices in the fact we are "young and FREE..."?!

I appreciate your time in considering my request.

Sincerely,

[REDACTED]  
[REDACTED]

## Submission for Option 1 – MBA to retain current approach to “Integrated Medicine”

To Whom it may Concern,

This is my submission to the board advocating maintaining Option 1. The proposal to restrict doctors from providing evidence based and proven treatments that complement existing treatments I find unnecessary and not in the best interests of the public.

### Options

The Board has identified two options in developing this proposal.

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.

Option 2 - Strengthen current guidance for medical practitioners who provide complementary and unconventional medicine and emerging treatments through practice-specific guidelines that clearly articulate the Board's expectations of all medical practitioners and supplement the Board's *Good medical practice: A code of conduct for doctors in Australia*.

### Preferred option

The Board prefers Option 2.

**Practice** means any role, whether remunerated or not, in which the individual uses their skills and knowledge as a health practitioner in their profession. For the purposes of these guidelines, practice is not restricted to the provision of direct clinical care. It also includes using professional knowledge in a direct non-clinical relationship with clients, working in management, administration, education, research, advisory, regulatory or policy development roles, and any other roles that impact on safe, effective delivery of services in the profession.

The definition of Practice above further exemplifies the Board's intent to restrict access to any knowledge or treatments that are not beneficial to the big Pharmaceutical companies that are dominating and funding the medical profession.

The board is deliberately targeting doctors who are knowledgeable and caring and that wish to provide treatment options that include effective natural and complimentary treatments.

I have personally had very bad side effects from Statins. They had me on 80mg of Lipitor for over 3 years which resulted in some very harmful side effects. Very stiff muscles in my legs making it difficult to walk and short term memory loss. They did not even prescribe Co-Enzyme Q10 to combat these horrible side effects. Side-effects that they refused to accept, as debilitating as they were, and wanted to just stick with what is the prescribed treatment for post myocardial infarction heart patients at that time. I believe this prolonged high dosage levels of statins are no longer the norm. I ended up with 2 Hip Replacements which I suspect was precipitated by the high dose statin treatment.

Hundreds of thousands of patients are admitted to hospital each year due to prescription medicines overdoses and side effects, in particular for those that are chronically ill. Sadly the Pharmaceutical companies are funding all the research projects and effectively controlling the medical profession as

a whole and now want to have the Board target practitioners with a genuine concern for the health and well-being of their patients.

General Medical Practitioners that are already sworn to the Hippocratic Oath and that go on to incorporate additional study to include integrated medicine into their offering for the treatment of their patients are trying to be shut down by the board. Frankly, I find this unpalatable.

There is a vast amount of research that supports integrative medicine and that it is evidence based; one just needs to look for it online. ie Pubmed or Google Scholar.

As a consumer, my family and I reserve the right to have options regarding our healthcare and option 2 impinges on our rights.

The use of “Medical Cannabis” for example is now becoming an accepted treatment for some conditions, but the public has known about its many benefits for years and in fact I know of a lay person that has beaten cancer several times after mainstream had told him he had weeks to live. He has gone on to help himself get to full remission and done the same for 23 stage 4 terminal cancer patients.

Instead of embracing the benefits of alternative therapies as a choice for patients and their learned General Medical Practitioners which seek to offer the best and least harmful options available, the Board seeks out to eliminate the patient’s choice and the treatments available to them through consultation with these caring and knowledgeable doctors.

I urge you to maintain Option 1 and allow the patients and the doctors to give a wider choice of treatment options for the benefit of all concerned. There are numerous cases where conventional medicine has been up staged by natural and alternative treatments and not just for cancer.

We have an Endocannabinoid System (ECS) which many doctors are not even aware of. It was discovered I believe in 1974 and found to regulate, mood, appetite and pain yet never studied.

Chinese medicine, which has existed for thousands of years and which I have experienced has some truly wonderful results. Much of Western Medicine has had origins in the writings and books the Chinese have had documented over the centuries.

There is also no case made by the Board as to WHY do they want to change the status quo? What cases are they referring to that indicate any need for change?

Who is the board trying to protect the Patient or “Big Pharma” the Pharmaceutical Companies that fund the profession?

Diet related treatments and Chinese herbs and teas, medical cannabis, vitamins and mineral supplements are effective and got your “Big Pharma” buddies worried? What if chronic illness gets cured with some of these proven treatments?

There are many documented cases of this and now that we have the internet allowing people to tell their story and spread good news about what has worked for them, it has the Big Pharmaceutical Companies worried about missing out on a lot of revenue.

It appears to me that the Medical Board is being persuaded by some mighty powerful Pharmaceutical Drug Companies trying and drive out any possible cures to chronic illnesses from natural or non-prescription based treatments.

Option 1 should remain. For those of you on the Board that are pushing to eliminate choice and restrict access to many beneficial treatments outside the mainstream, I sincerely hope that you become more open minded and look more closely at the many documented cases where outstanding results have been achieved by the vary treatments you wish to restrict doctors from offering.

Integrative Medicine should be encouraged not restricted.

Yours sincerely,

[REDACTED]

[REDACTED]