Saturday, 8 June 2019 3:09 PM

To:

medboardconsultation

Subject:

Consultation on complementary and unconventional medicine and emerging treatments

To whom it may concern,

As a passionate and informed user of complementary and holistic medical practices I am truly and deeply concerned about the Medical Board of Australia (MBA) commencing a public consultation on new guidelines for 'complementary and unconventional medicine and emerging treatments'.

The following are just a sample of my many concerns.

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

I have never ever been concerned that the natural and research/evidence based practices I endorse and use daily have ever, and will never harm me as they are natural and safe. Do not restrict my choice for a more natural and healthy alternative. This is a violation of my rights!!! My son with autism and mental health issues is thriving under the care of such practices. We must have choice! It is a basic right to seek medical help in a way that fits our beliefs.

I implore you to re-consider these proposed guidelines.

Your sincerely,

Sunday, 30 June 2019 12:44 AM

To:

medboardconsultation

Subject:

Consultation on complementary and unconventional medicine and emerging treatments

My mum is 79 years old. When she was 58 she was diagnosed with lupus. But before that it took two years of numerous visits to various specialists doctors, many tests and painful biopsies to be told that she is presenting classical symptoms of lupus. By that stage she was bedridden. My father had to retire from work to take care of my mum. The treatment that was on offer by conventional medicine was very harsh with no big promise of complete healing and with many side affects. So mum decided to give a homeopathy a try. The homeopathic doctor explained to her how it works. Mum was diligent about the treatment and took everything as it was prescribed by the homeopathic doctor. And to everybody's surprise she slowly started to get better. It took 3 years for all her symptoms to completely disappear. And another three years of the treatment to completely go into remission. She still sees her homeopathic doctor a few times a year to keep an eye on her health. Apart from that she sees a rheumatologist who does not treat her with conventional medicine, but rather is very open to complementary medicine and when he first saw my mum he was very impressed with how homeopathic doctor has healed my mum so they together look after my mum and consult with each other in regards to her health. Just recently she had a blood test done to check her lupus antibodies and they are in the normal range. She is still in remission after so many years. Once again I would like to bring to your attention that she has never taken a conventional medicine for her lupus. Only homeopathic treatment. And she is a classic example that it works.

Please we urge that it is so important that people have free choice as to who treats them and how.

Sincerely yours

Sent: Sunday, 30 June 2019 1:30 AM

To: medboardconsultation

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

My daughter is 33 years old now and since she was 23 year old she was getting sick quite often and would take a long time to recover from constant colds, whooping cough, glandular fever. And every time she would get weaker and weaker.

There was one year that she had her body temperature elevated all the time during many months. Went from doctor to doctor and nobody could find what was wrong or paid much attention.

So years of feeling unwell and two miscarriages, she finally turned to integrative doctor.

He did genetic testing, witch opened our eyes to many things.

Discovered some gene mutations. Especially MHTFR. Integrative doctor has put her on supplementation by compound pharmacy.

Every three months she gets IV vitamins and minerals. That keeps her away from colds and increases her energy level.

The frequency and severity of her colds and flues has decreased substantially. She has been taking folinic acid for her MTHFR mutation instead of folic acid.

So far her health has greatly improved and since then was able to get pregnant and carry to full term. Her daughter is now 3 years old and absolutely gorgeous. Now she is pregnant with her second baby and in a third trimester now.

We urge you to think carefully at your decision as it may impact on the health of many people.

It is important for people to have the right to choose the doctor and the treatment whether it is conventional or integrative or complementary.

Thank you

Sent: Saturday, 29 June 2019 12:03 PM

To: medboardconsultation

Subject: Patient submission regarding

Dear Medical board of Australia

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

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 medicine, the side effects of most medications 'trialed' on me made me more unwell. I now prefer non drug approaches for many reasons, but obviously I still manage my own and my family's health with a mixture of conventional and integrative medicine methods.

My integrative GP is very busy and is mostly unable to take on new patients. I know many of my friends would benefit hugely from her knowledge and approach to medicine. I wish it was easier for more GPs to adopt integrative knowledge, and practice it confidently.

My personal health experience...

Before finding my current 'health team' who manage my health with an integrative approach:

- I was in constant all over body pain, I found it hard to walk or drive or even just sit still.
- I had crippling depression.
- I thought about killing myself most of the time, only not doing so because I couldn't put my young children through that.
- I couldn't work in a job.
- I was seeing various health related professionals at least twice per week.
- I was on a host of medications, all of which had terrible side effects for me.
- I spent time away from home in a hospital for psychiatric care which bought on terrible anxiety in my children

I was embarrased to be alive, because I knew this was not how I wanted my life to be.

- I never socialised or took my children anywhere.

Today: totally due to my integrative GP, and other integrative health team members.

- I regularly run (and even sprint) enjoying training with my athletic daughter... which isn't bad for a 50 year old!
- I have an energetic job in a primary school and love every minute of it
- I do volunteer work
- I am a Carer a few hours a week for a person with a disability.
- I am mostly pain free.
- I only see my health professionals occasionally to keep on track and my integrative GP every 3 months.
- I rarely catch colds or bugs and rarely have time off work.
- I can help my kids with their school work, and everyday issues... I am a 'good mother'!
- I never think of killing myself, I shudder at the thought of how this would effect my family.
- My family now have a social life.
- I feel SUPPORTED and understood and CONFIDENT that I will have a full life as long as my integrative health team are able to care for

me as they do now.

 I have a good knowledge about complimentary medicine and know who to confidnetly go to, to find answers for any of my families health issues.

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

I wholly believe that prevention is better than cure.

Australian Integrative medicine is simply conventional medicine plus a whole lot more, and reduces the risks of future chronic disease. I wish I had come across IM years earlier but at least I know that with current practices, I can help guide my children to live a healthier and more informed life.

This proposal makes me personally fear that I will not be able to live the healthy happy life that is only possible for me due to my current integrative and complimentary health professionals.

Yours sincerely

Dear Medical Executive Officer

My name is , I am 48 and I live in New South Wales.

In early 1995, I was diagnosed with progressive MS. I wasn't prescribed disease modifying drugs because the top neurologist in Australia at the time confirmed that intervening drugs didn't help my type of MS. Because allopathic western medication had nothing to offer me to help me battle this disease, I had nowhere to turn but complimentary and integrative medicine.

In the field of complementary medicine, I received life-saving help and support. I was given invaluable guidance on the path of well-being, educating me to purify and nourish my body. I was guided to undergo body therapies that eliminated rigidity and strengthened my body - such as Bowen therapy and remedial massage. I received Acupuncture that improved my circulation and increased movement in my limbs. I also took Chinese herbs and Ayurvedic medicine supporting my organs; warming my body; improving my digestion and so on.

During the past 24 years, I have received nothing but complementary medicine to keep me functioning as well as I am, despite my physical challenge. In all my experiences with the many practitioners that crossed my path along the way, I have always been happy with their genuine care. As a consequence, I have been imbued with hope that I can continue being as well as I am. I value the availability of integrative medicine more than words can say and would prefer not to live in this world if it weren't available.

This leads me to stem cell therapy. My greatest hope and optimism is that Australia comes on board in offering stem cell therapies ASAP to people with degenerative diseases that aren't helped by any other means. I have been ardently watching the global stem cell activity and am so encouraged by many positive results and understand that not everyone has them. I'm discouraged by the cost involved when it includes travelling overseas. So I'm waiting on Australia that is so advanced in the medical field, but this. I believe we have a 'Right to T God ry' stem cell therapy like the new law in Texas.

My longtime GP has always discussed with me the potential risks of stem cell therapy but she is compassionate, understanding my need to do something potentially helpful ASAP. The risk is worth it. The potential harmful side effects couldn't be much greater than those already that occur when taking strong disease modifying drugs given to MS sufferers every day around the world.

I wish to add that my GP has discussed options and been supportive of my treatments throughout much of my journey seeing the physical benefits and my greater well-being directly as a result of complementary medicine. To impede the availability of such treatments would be no less than criminal I am compelled to say... For the last 20 years, I have been writing an autobiography about my healing journey that wouldn't exist without such medicine. I am working with an editor, who is very excited about it. I am hoping to finish it this year and can't imagine the conclusion being that my country was to block my path to wellness.

Please Australia, please Medical Board... Please stay with the status quo. Please continue allowing practitioners to operate for us as best they can. They are the only place people like me can turn to. Don't make it so difficult that practitioners can't afford to offer such services to us.

If you do choose the greater regulation Option 2, please ensure that it applies to ALL medical practitioners with the same onus and that the Board accepts that Integrative Medicine utilising Complementary 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 the feeling the new regulations.

Trusting and praying that you and the Medical Board will act in the best interests of the greater good that includes all people.

Please do not hesitate to call to discuss my genuine duty of care for my well-being and the well-being of so many in this matter.

Thanking you from my heart,



Sent: Saturday, 9 March 2019 12:32 PM

To: medboardconsultation

Subject: 'Public consultation on complementary and unconventional medicine and emerging treatments'

I would like to raise my objection to any banning of NDT medication or T3 medication being prescribed in Australia. I had been on T4 Thyroxine for four years and slowly my Tsh levels began rising as were my thyroid antibodies. After much consultation and cost I finally found an answer....

My body was not converting T4 to T3

Hence why I was feeling so unwell, despite my GP increasing my Thyroxine each time.

On being prescribed NDT medication my Tsh levels dropped and my health / energy levels improved.

Thyroxine does not suit everyone, other options need to be available in Australia.

Sent: Saturday, 6 April 2019 12:49 PM

То:

medboardconsultation

Subject:

Feedback on Consultation on complementary and unconventional medicine and emerging

treatments

Dear Medical Board of Australia (MBA),

As a father of 2 autistic boys, I would be deeply concerned on the negative perception and impact MBA may have on the medical choices and options.

This is particularly the case when modern medicine does not have a suitable and satisfactory cure for many maladies. There is an especially low success rate for curing chronic conditions or even improving the outcomes for sufferers. Reducing choice and options for little or no benefit is contrary to the betterment of humanity.

Of course you would have received similar to the items below,

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

However as a paper, it is apparent that its intent and content/approach are misaligned.

Regards



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

Main long term health problems:

I sought help from my integrative health practitioner for Chronic Nausea, Chronic, Fatigue, Anxiety and Depression.

Prior to seeing my integrative healthcare practitioner, I had made multiple attempts at restoring my health with conventional GPs with no success - culminating in a dismissal of any organic illness by my regular GP.

Treatment had consisted of pharmaceuticals for reflux, nausea and depression - SSRIs etc. These treatments impacted my health mores through side effects. Any long term impacts are unknown at this point in time.

Despite this, in my desperation I was open to anything maintaining all along that there was an organic cause - I felt wretchedly ill .

Absolute focus in determining the root cause of my symptoms with thorough, rigorous, systematic and tireless exploration followed by a systematic trial of approaches.

The effects of treatment were a very tangible incremental improvement and ultimately success. Nausea cured, Anxiety and depression cured successfully through various protocols and systematic approach.

No side effects were felt, all my expectations were managed including an understanding given of potential side effects I may have felt. Absolutely no harm was done.

My integrative healthcare clinic and practitioner displayed an acute understanding of the possible contributing factors thorough pathology and a deep investigation of lifestyle which included diet and environment. My gratitude and admiration for Dr in at first restoring my belief that there was hope for my improvement in Health and in making e well again highlighted what medicine and health care **should be**. In fact It awoke me to the lack of care I had been receiving from countless doctors I had visited in investigating my health issues prior. I have my health back.

Tuesday, 2 April 2019 10:49 PM

To:

medboardconsultation Subject: **Complimentary Medicines**

Executive Officer Medical - AHPRA **GPO Box 9958** Melbourne VIC 3001

medboardconsultation@ahpra.gov.au

RE: PUBLIC CONSULTATION ON COMPLIMENTARY MEDICINE AND EMERGING TREATMENTS

To whom it may concern

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

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

My daughtertcannot thank her doctors enough for the risks they take on themselves with Boards such as yours that are continually putting up road blocks when it is quite clear to the majority of patients, that the combined allopathic/complementary treatment protocols work.

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

My daughter has had to use Complementary, Unconventional and Emerging Medicine and Ihighly values its availability and is very happy with its practice. Her treating doctor already provides discussion about options for treatment and their relative merits and potential problems. She, and her family value free choice in making decisions regarding her own personal medical treatment, as much of the treatment she has been given has been totally ineffective, and cost prohibitive.

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

As such, and as a mother and father of a sufferer, our preferred choice of the proposed outcomes is to retain the status quo, otherwise all 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 our expectation is that we should all be able to attain the treatment of our choice, here at home.

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

As highly concerned parents to a young woman who has now suffered for over 12 months, we implore you to reconsider your position.

Your sincerely

2.4.2019



Tuesday, 26 March 2019 4:36 PM

To:

medboardconsultation

Subject:

Public consultation on complementary and unconventional medicine and emerging treatments

To Whom It May Concern,

I'm writing to urge great care in the proposed regulations. When considering the unconventional treatment approaches of these medical professionals, one must be aware that a great deal of patients are those suffering from chronic and autoimmune disorders that are unable to find adequate care or treatment within conventional healthcare. I would like to share my own story as an example.

I first notice declining health as a teenager, over 20 years ago. I went to several doctors, and was given minimal tests, told my lab results were fine, often with the implication that I must be imagining things, or lazy, or later, as I gained weight as a result of my overwhelming fatigue, the weight itself was used as a scapegoat for my symptoms. This continued well into my 30s, every now and then I would gather up the strength and hope to see if a new doctor might help, and inevitably, they wouldn't. I was so desperate that I was edging closer and closer to giving up on life completely.

I finally realised that I would need to seek alternative help, and found a highly recommended integrative doctor. Now firstly, he was the first doctor to ever bother testing me for nutritional deficiencies, and I was found to be severely deficient in several. He also tested me for specific thyroid tests which are generally considered to be irrelevant to most conventional doctors (Incorrectly I might add, as there have been recent studies showing their validity). Based off these tests, for the past year I have not been taking a medication which is also considered varying degrees of controversial to unnecessary by many doctors, and I can tell you that it's changed my life. For the first time in over 20 years, my health is getting better instead of steadily worse.

Integrative doctors like my one already deal with an extremely restrictive system. I even have to pay out of pocket for some of my key blood tests because Medicare essentially blacklists doctors who order them as rebates because Medicare considers them unessential. These are the same blood tests that finally unlocked what was going on with me, and that need to be monitored with the medication I'm on. If this change goes through, I might lose the only medical ally I've ever had, and access to a medication which is helping me feel like I'm alive again.

Like it or not, but when it comes to chronic and autoimmune conditions, there is a stark lack of research or treatment options. So while trying to protect patients sounds good on paper, the reality is that many of us have no choice than to try experimental treatments, and actively seek out doctors willing to do this. You see, our quality of life is often so low that the risks are 100% worth it. This is a choice we're prepared to make, and we should be allowed to make it.

I know many people with stories similar to mine. Please don't take away our ability to try and use treatments that may be under-researched, but for many of us are the difference between living or suffering.

Regards,

Monday, 15 April 2019 9:04 PM

Sent:

medboardconsultation

Subject:

Public consultation on complementary and unconventional medicine and emerging treatments

Sorry this is late but I have only heard of the proposal.

I do support option one as it allows guidance to general practitioners and the examples in the document provided show where people have bene charged or otherwise pursued for using dangerous practices.

Natural medicine is in food, is in nature and that is what we as a community avoid, a lot eat processed food and live in processed buildings with little interaction with nature. It doesn't flow then that we need conventional medicine. Though conventional medicine may assist to restore balance, natural medicine or conventional Traditional Chinese Medicine may assist also with a knowledgeable practitioner.

There has been much research on gut microbiome and a variety of complementary bacterial on the skin. To improve gut health through foods or supplements may be highly beneficial, low cost and with positive effects.

To hydrate a body with water could also alleviate a number of symptoms.

The General Public should be well informed to make reasonable decisions. I had knee pain recently and a Chiropractor wanted to send me to a specialist who was a surgeon. I didn't do that and worked with others, correcting muscle imbalances which took load off the knee and at 54 I am back running and riding, jumping, climbing. I did not take the conventional route and my knee wasn't cut open.

Using natural medicine with 'conventional' medicine is often beneficial.

A problem with this society and conventional medicine is that conventions are different in different areas of the world. Likewise a medicine that is pushed to be used and touted to be good may later be recalled due to adverse side effects. I recall in the 1970's my father was told by a GP to keep smoking cigarettes to help ease stress, he did keep smoking and died at 63 with arterial issues.

Antibiotics have been amazing but overused and now Doctors are told to limit use to when absolutely needed. How many have suffered due to conventional use of antibiotics before the dangers were identified.

The problem is not unconventional or conventional, the problem is unproven medicines, used over a period of time with humans. Natural medicines have often been used for many, many life times.

Many complementary and unconventional medicines are science based, for example science has confirmed there are health benefits to yoga practice. Science has not caught up with proving all complementary methods, or it has but it is not widely accepted, for example Vitamin E is made up of eight distinct compounds: 4 tocopherols and 4 tocotrienols. These components have slightly different chemical structures, and these differences impart unique properties that influence their biochemical functions and their effects in the body. Most supplements contain tocopherols when tocotrienols are said to be more beneficial. This information may not be widely known or highly regarded. This doesn't make it wrong.

Please; if traditional therapies are unconventional, let them be; the proposal is not to give guidance on emerging treatments, it seeks to control 'unconventional' treatments etcetera whether they are accepted and proven or not.

I do support option one; and

I do object to the proposed definition of Complementary and Unconventional Medicine		
Thank you		

Tuesday, 9 April 2019 11:08 AM

То:

medboardconsultation

Subject:

Consultation on complementary and unconventional medicine and emerging treatments

Hello,

I have been advised by our medical provider that guidelines are being amended which will affect how I presently obtain medications for my son.

I assume prior to making such amendments, consideration for all aspects which will affect the "people' at the end of these guidelines have been assessed.

My son, aged 13, who has autism relies on a medication being compounded for him. It has been a fantastic influence on his overall self with definite tangible results from him having this medication available to him. If you have understanding of autism, it is very rare for something to have a real visible effect on behaviour/emotional – and also be a natural supplement.

I am led to believe that these guidelines will impact on how we may be able to obtain his medication, in particular with the doctors even being able to prescribe this medication for him as it is an integrated medicine and may be considered 'alternate'. Grouping things such as vitamin and mineral supplements into such a broad group with things such as "energy healing' is very disturbing.

I would expect that supplements (which have been proven to do so) which can impact on the physiological sides, to our beings are very different to broad alternate treatments, such as 'energy healing'

I hope that you revise guidelines in view of the end user, with the understanding that there are real people, children, families and their futures affected by your changes, and as this will have an enormous impact on my child and our family, should these guidelines go through as is.

I appreciate that guidelines need to be reviewed, updated to keep up with advances etc, however, please allow GP's/Biomedical GPs etc to continue to use their **expertise** in prescribing integrated medicines as they do for my son.

I am only one of many, and perhaps not many will be sending you their concerns. I am a real person, a parent, as many are, desparate in trying to improve my sons daily living – the proposed guidelines WILL impact on my ability to do just that.

Appreciate your consideration.

Sent: Thursday, 11 April 2019 7:12 PM

To:

medboardconsultation

Subject: CENSORSHIP OF INTEGRATED MEDICINE IN AUSTRALIA

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: Hashimotos Thyroiditis and Fybromyalgia for over 25 years.

Conventional medical doctors have not been able to successfully diagnose let alone treat my conditions and bring me to a

satisfactory level of health.

Pharmaceuticals and the use of conventional methods simply did not work and, seemed to waste Medicare funds and

resources.

It was only when I saw an integrative medical doctor who listened to my concerns, ordered the relevant tests, 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 know that my health will deteriorate and have a continuing impact on my family, my work, and my wellbeing.

Additional notes: I have wasted more than 15 years of my life trying to find a conventional doctor that would listen to me, continually being told I did not have a health problem and condemning me to NO quality of life. I have finally been given my life back and am now capable of holding down a full-time job without having to take six to eights weeks of sick leave a year. This all happened because I found a Doctor who listened to me and was capable of thinking outside the square. Most conventional GP's that I see now criticise me for my choice and tell me I am wasting my money. I will invest my money in a doctor that uses integrative medicine practices any day.

Extremely Concerned,

11/04/19

<u>Submission to MBA Consultation document on complementary and</u> unconventional and emerging treatments.

My name is I am a 56 year old female and I have Hashimoto's disease. I suffered from extreme symptoms of the condition for years before the final diagnosis in 2011.

Previously, I had consulted several GPs about my main symptoms – hair loss, extreme weight gain, brain fog and debilitating fatigue. These were of great concern as I was a single parent with 3 children – one with a disability – and trying to hold down a fulltime job in a safety critical area. I underwent sleep studies, blood tests, and a course of antidepressants without getting to the root cause of my symptoms. "You are just an overworked single mum" I was told. However, what I was going through was far too severe for that to be the reason.

It wasn't until I looked outside the conventional medical realm that I finally started to get some answers. I consulted a naturopath who ordered a full panel of thyroid tests which confirmed her suspicions of Hashimoto's disease. On obtaining the results, I took them to my GP who referred me to an endocrinologist. He made the official diagnosis of Hashimoto's disease, prescribed me the standard medication, Thyroxine, and told me to go away and that I would be fine.

Well, I wasn't fine. After taking the medication for several months, nothing had changed and I went back to the endocrinologist who told me that that was all he could do for me. This was not a satisfactory solution as my life had become quite unbearable. I was struggling to do even the smallest task successfully. If I tried to exercise, I was bedridden for a week.

My naturopath then suggested I see an integrative doctor who could look at my whole health situation; someone who would listen to me, think "outside the square" and who was not afraid to recommend unconventional treatments.

My first appointment was life changing as I had now found someone who believed me when I told them that the standardly prescribed Thyroxine was not working and that this disease was making life difficult for me and those around me.

The first thing which was done was a blood test to discover any food intolerances or any foods which were causing inflammation in my gut leading to "leaky gut" syndrome. The results of the test were that I should not eat

wheat or dairy products or chicken eggs. I agreed to trial this although it would be difficult. Within one month, I had started to feel a difference. I felt alert again, something I had not felt for years, and was beginning to have times when I could be awake for more than 6 hours without a sleep. My mental health underwent a dramatic improvement as I could now see that maybe I could feel better and manage my condition. Maybe there was a life outside the foggy hell where I had been living.

The doctor also recommended certain supplements which would help support my gut and thyroid health.

After about 4 months, I had another full panel of thyroid tests done. These showed that, while my gut inflammation had obviously improved with the dietary changes, my thyroid levels were still not in the optimal range and that, if these were addressed, I could feel even better. A full thyroid panel is something my regular GP refused to request. The testing of only TSH levels is not useful as my TSH has always been normal but all other thyroid levels, especially the antibodies, were way out of normal range. These levels needed to be addressed if further progress was to be made.

It was then decided to trial me on a low dose of a medication which had been shown to regulate autoimmune responses in people suffering from diseases such as mine. This was in addition to my prescribed thyroxine and supplements.

It has now been about 18 months since I started seeing an integrative doctor. I understand that I will never be cured of my condition. I have it for life. But now I feel I have a life. If it had not been for this doctor and his willingness to listen to me, to keep up with the latest information and research about successful treatments both in Australia and overseas and do complete blood screenings, I would have been a drain on the "system". I quite likely would have had to give up work as I could barely function and was spiralling down into severe depression. I don't know what would have happened to my children. I would conceivably have been in and out of hospital on a regular basis.

My friends and family used to wonder why I would avoid any social events. I just felt too sick and tired to leave the house except to work. Now, I feel like I have my life back. I could never have had this without the support of a doctor who practices integrative medicine. I will be now visiting him about twice a year for check-ups as I have found treatments that work for me and a doctor who will work with me.

Sunday, 30 June 2019 8:18 PM

To: medboardconsultation

Subject: Submission

To whom it may concern,

I choose Option 1.

I have regularly been seeing an integrative medicine doctor for the last 20 years. My doctor spends far more time with me than other G.P.s. He informs me of my treatment options and takes the time to help me understand the potential benefits and side effects. I have found little support or relief for my chronic health concerns with conventional medicine.

I am concerned that the proposed regulations are targeting integrative medicine unduly - when these practices do not require further regulation than that which govern all G.P.s. My ability to make informed choices about my own healthcare will be dramatically reduced if the proposed regulations are installed. I fear for my health should I lose access to integrative medicine.

Additionally, 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.

Please consider the impacts these regulations will have in decreasing health outcome for countless Australians.

Regards

To Whom It May Concern

I am writing in protest against the medical board targeting and shutting down medical practitioners treating a number of diseases and in one case "Lyme Disease"

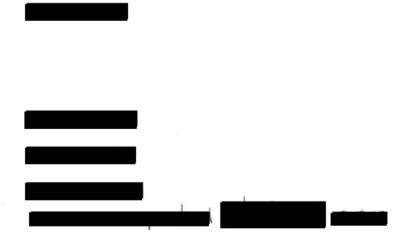
It is an unfortunate disgrace that people from the medical board wants practitioners to stop treating patients who are clearly suffering. The original tick bite I received was in Western Australia where I slowly became ill with each passing day till I became bedridden with the feeling of dying and surprised that I woke up the next day still alive and did not want to be. The pain was horrendous and I have no desire to return there. The pain is intense from the skin going right to the marrow and thru out the body. Infections are a daily battle. This was 8 years ago. Being fobbed off by doctors after doctors for years and then labelled and treated with fibromyalgia was unsuccessful.

A documentary on Lyme disease made me realize this could be me. That was 5 years ago and \$3000.00 later and diagnosed with Lyme disease. 3 years ago I am finally being treated and believed and no longer feeling intense pain and brain numbness on a daily basis.

With the feeling of being forced by the Australian Medical Board for continuing suffering and not having treatment for Lyme disease from medical practitioners is shameful and hurtful. I am thankful to find Doctors out there who are willing to help in small ways to ease the pain and discomforts. I have opted for natural medicines and diets to slow the bacteria and go into remission knowing I will never be cured. This is the only way I can function and need to work to be able to pay the average of \$400.00 per month on medications. If the doctors were allowed to treat me from the onset of my illness I reckon I would not be sick today. A social life is difficult as I need to rest up for the week ahead of work.

This is my petition of protest against the foreshadowing of your intention to restrict or to shut down doctors who practice outside the normal paradigm.

Yours sincerely





From: To:

medboardconsultation

Consultation on complementary and unconventional medicine and emerging treatments Saturday, 13 April 2019 12:27:16 AM Subject:

Date:

Attachments:

Please see attached.

Regards,

Sent on 12/4/2019

I am writing in reference to the acceptance of using alternative thyroid medication. I've been using Thyroid Extract for approx. 2 years. I was diagnosed as being hypothyroid about 5 years ago and had no choice when they placed me on Thyroxine. In my experience I never felt clear headed and always felt that I needed to work out what was going on with my body. I seeked a doctor who would listen to me and I was placed on this Thyroid Extract and I felt a massive difference to my body. I am not a wealthy woman and the new medication is already costing me a significant amount more but I feel for my health fact it is worth it. I believe it is our body and we should have a choice in our medication and not pressured into using the pharmaceutical solution if it doesn't suit us. I seeked a difference due to not feeling great from Thyroxine and I have been feeling a lot better. I am thankful that I have found a doctor who was willing to administer this to me and I will be very un happy if you take this option away from me and other Thyroid patients.

Please do not make this option unavailable or unaffordable to the Thyroid sufferers of Australia. Australia needs to be progressive and taking this option away makes us a more uncivilised nation.

From: Sent:Monday, 1 July 2019 12:07 AM

To: medboardconsultation

Subject: Public Consultation on clearer regulation of medical practitioners who provide complementary

and unconventional medicine and emerging treatments

To: The Medical Board of Australia

From:	

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

Thank you for giving the public an opportunity to contribute to the regulation of medical practitioners who provide complementary and unconventional and emerging treatments.

I present my views as a registered nurse with a Master degree as well as a consumer who has used complementary medications.

- I support the MBA continuing with its current code of Good Medical Practice;
- I do not support the MBA producing an additional guideline document as an outcome of this consultation.

Below are responses to the questions under consideration:

Q1 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?

Answer:

I do not agree with describing integrative medicine by grouping 3 different modalities, namely "complementary", "unconventional" and "emerging" treatments under one umbrella term. This is not scientific and it also discredits integrative medicine and does not accept it as evidence based and an important component of holistic care.

Q2 Do you agree with the proposed definition of 'complementary and unconventional medicine and emerging treatments'?

Definitions used should be agreed upon by international and national industry bodies namely the Therapeutic Goods Administration (TGA), Complementary Medicines Australia (CMA), the National Institute of Complementary Medicines (NICM) and the Australasian Integrative Medicine Association (AIMA).

The definition of Complementary Medicine (TGA) -medicinal products containing such ingredients as herbs, vitamins, minerals, nutritional supplements, homeopathic and certain aromatherapy preparations. These are regulated as medicines under the Therapeutic Goods Act 1989.

I do not agree with the term "unconventional medicine". This is ambiguous and unclear.

I also do not agree with the term "emerging treatments" which is again ambiguous. If one checks a medical journal for emerging treatment, one can find new evidence-based treatments for a number of medical conditions.

Q 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'?

I do not agree with the above.

Adverse Drug Responses (ADRs) as reported by the Therapeutic Goods Administration (TGA) shows that only 1% of ADRs are from complementary medicines. This clearly demonstrates that the relative risk is low and does not warrant the proposed guidelines.

There is no evidence in the discussion paper that quantifies the risk in using complimentary medicines.

Q4 - Are there any other concerns with the practice of "complementary and unconventional medicine and emerging treatments by medical practitioners that the Board has not identified?

The Board has not taken into account the following:

- Conventional medicine says it is evidence based and on basis of this does not treat a number of conditions when there is not enough evidence. To me that is an issue. As by doing this, conventional medicine fails and by not taking action, it does harm.
- Registered medical practitioners must have the freedom of choice to study and utilize other evidence based emerging treatment as well as complimentary medicine. However, they have a duty of care to inform patients that they are using complimentary medications and other approaches.
- Consumers now a days well informed and can chose the modality of treatment and their medical practitioners. They may chose a medical practitioner who only practices main stream conventional treatment or they may chose a medical practitioner who practices nutritional or other non-conventional medications. By not providing them with choice, the AMA are not acknowledging them as partners in care. It is estimated that more than two thirds of the Australian population use complementary medicines as a part of their self-care. isn't it then a safer option for the patient to choose a medical practitioner who uses other therapies alongside conventional therapies.
- The WHO also acknowledges the importance of complementary medicine "The WHO's 13th General Programme of Work (GPW13) came into effect this year for 2019–2023. As a strategic priority, GPW13 sets an overarching goal of reaching 3 billion more people, to move towards Sustainable Development Goal 3 (SDG 3) ensuring healthy lives and promoting well-being for all at all ages by achieving universal health coverage (UHC), addressing health emergencies and promoting healthier populations. **Traditional and complementary medicine (T&CM) can make a significant contribution to the goal of UHC by being included in the provision of essential health services.**" (WHO GLOBAL REPORT ON TRADITIONAL AND COMPLEMENTARY MEDICINE 2019). By not acknowledging and giving medical practitioner a choice in using complementary medicine, the board does not support universal health coverage. The proposed guidelines hence appear to be contradictory to the WHO strategy and it violates the human rights of all Australians, particularly indigenous peoples.

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

The proposed guidelines are adequately covered through the existing "Good Medical Practice: A Code of Conduct for Doctors in Australia".

I would also like to comment on the Boards approach to conditions not generally accepted e.g. Lyme disease. The Board does not acknowledge that there appears to be a condition that is tick borne related and has caused many Australians to suffer and reduce their quality of life, sometimes causing them to suicide. I developed numerous symptoms following a tick bite in Australia. My symptoms were discredited by many doctors and I had to give up full time work as a senior nurse educator. I was told I was depressed but anti-depressants did not provide any relief. I traveled overseas to the USA for personal reasons and decided to see a doctor and get myself tested and I tested positive to Borrelia and a number of co-infections. Coming back to Australia, it was difficult to find a doctor who was willing to acknowledge and treat my condition due to the AMA stance. Ultimately I was able to find a doctor and through long term antibiotics and complimentary medications, I have resumed work after being sick and not being able to work for 2 years. By not acknowledging and providing me treatment, the treating doctors actually harmed me till I found the doctor who was willing to treat me.

Please accept my views both as a nurse and as a consumer who has been affected by the stance of the AMA. Please consider "DO NO HARM" and that harm can be done when one choses to do nothing and wait for evidence.

Friday, 5 April 2019 2:13 PM

To:

medboardconsultation

Subject:

Consultation on complementary and unconventional medicine and emerging treatments

5/04/19

Medical Board Submission,

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

As an Australian citizen I feel that medical freedom is of up most importance and is part of a free and democratic society. I have had a number of chronic health issues over the years more recently with severe debilitating fatigue and neurological disorders, as a result of spinal surgery. A Neuro-surgeon told me he had "absolutely no idea". Without a choice in practitioner, without the option for help and guidance which does not involve pharmaceuticals and more surgery what am I supposed to do? I am unsure when Pharmaceuticals became the only choice in health? When did AHPRA and the medical board decide that their doctors were only allowed to be pharmacists or even worse glorified drug dealers? The amount of evidence supporting not pharmaceutical treatments is overwhelming and therefore I can only assume this attempt to quash such treatments is instigated by the pharmaceutical industry attempting to get more control in a market that they already have unhealthy monopoly on.

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

Yours faithfully

Wednesday, 10 April 2019 3:05 PM

To:

medboardconsultation

Subject:

Inquiry into proposed new regulations for Complementary and Unconventional and Emerging

Medicine

The Executive Officer,

I am writing to you to express my concern about the Medical Board of Australia's (the Board") proposal to create a strict new set of regulations governing the practice of "Complementary and Unconventional and Emerging Medicine". I believe that the effect of the proposed Regulations will be to significantly increase the burden of paperwork on Integrative Medical Practitioners and so increase the cost to persons like me who make use of such practitioners.

As a 70 year old person in otherwise robust health who has been recently diagnosed with advance prostate cancer I can say that so far my current experience with the medical profession vis a vis integrative medical practitioners has not been entirely satisfactory with consultations leaving many questions unanswered as to treatment options and lack of guidance. Prostate cancer is perhaps the perfect example of a limited focus by conventional medical practitioners on one part of the body where in fact a diagnosis of prostate cancer clearly has an impact not only on the whole body but the entire welfare of a person so diagnosed.

I am of the view that any change to the Regulations to require practitioners to explain the efficacy of a proposed treatment, supplement or medicine should be applied to all medical practitioners equally. In my view many conventional treatments recommended by medical practitioners have not been subject to evidence based verification. Modern medical practice can no longer hide behind past practices simply because it has "always been done that way".

I believe that the Board must accept that Integrative Medicine, utilizing 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 any new Regulations.

Best regards,

Sunday, 30 June 2019 11:51 PM

То:

medboardconsultation

Subject:

Consultation on complementary and unconventional medicine and emerging treatments

Dear Medical Board Australia,

Regarding the consultation on integrative medicine.

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 my daughter and I both suffer greatly from auto immune diseases which were not diagnosed or treated by conventional doctors. Our symptoms had made life difficult, painful and unbearable at times and it was hard to see light at the end of the tunnel until we found integrative medicine that could diagnose, treat and support us at last. I see so many people who, due to integrative medicine, have been able to enjoy and cope with life without pain and manage illnesses that had not been treated in conventional medicine and I can't understand why the Medical Board of Australia would jeopardise people's health and individual care. Why would they allow for a decision and regulation that will result in people suffering unnecessarily when they could be treated successfully through integrative medicine.

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

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 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.

Thank you for your time and I hope for a decision that supports people's health by allowing them to to choose integrative medicine that will provide answers and a positive quality of life. What everyone deserves. As my 12 year old daughter stated when hearing of this possible regulation, "what about the kids that will never get help and get better? They shouldn't have to suffer like I did".

Regards,

Sent: Sunday, 26 May 2019 5:12 PM

To: medboardconsultation

Subject: Australian Health Practioner Regulation Agency

I am writing to you regarding my right to choose the Doctor of my choice. 30 Years ago I became unwell with severe pain. My GP sent me to a Rheumatologist. He sent me for extensive tests & told me he would have me out of my full time work and on a disability pension in two weeks. Also said by the time I was 60 I would be in a wheelchair. I told him I wanted to get better not retire from work or be in a wheelchair. I had arthritis, about three different types. My work sent me to a Doctor who did Integrative Medicine and I got better. I am now 76, retired and not on a Pension or in a wheelchair and have moved away from Sydney and now see another Doctor who does Integrative Medicine. Normal Doctors need you to be sick. Integrative Doctors are better trained than your normal Doctors and keep you well. Think how much money the Government have saved with me not being on a Pension. Let Scott Morrison know about my case.

Yours Sincerely

Sent: Sunday, 30 June 2019 5:33 PM

To: medboardconsultation

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

To the Medical Board of Australia

Concerning public consultation on regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments

I SUPPORT OPTION 1 - NO CHANGE

I rely on integrative and complementary medical specialists, and I use natural medicines and therapies to create some resemblance of health, because standard doctors and specialists and pharmaceutical medicine has failed me comprehensively for 15 years. If you proceed with your plan to impose restrictions on integrative practitioners, you are condemning me to a life of pain and suffering, and you, as doctors, pledge to do no harm. You will cause great harm if you continue.

I suffer from a number of chronic illnesses, including chronic fatigue syndrome, chronic respiratory congestion, and frequent migraines, all of which became so debilitating 6 years ago that I had to give up my job and career, I lost my home and the life I had hoped to lead.

I have seen over a dozen doctors and specialists the last 15 years because of my symptoms. NOT ONE of the 10 conventional medical doctors and specialists I saw could even suggest what my health problems were. NOT ONE medical treatment prescribed improved my health or quality of life. NOT ONE of these practitioners had any answers for my health challenges, and my quality of life vanished into a sea of pain.

The only effective diagnoses and health improvements I have gained were from two doctors I saw who practice complementary and integrative medicine, and from natural therapists. The ONLY treatments that have improved my health and quality of life are herbal remedies, supplements and homoeopathy.

Perhaps you think it is placebo? What utter rubbish. I have a science degree in human physiology and biochemistry. I have researched extensively for over 15 years now seeking answers and solutions, and have an excellent knowledge of the biochemistry and physiology of my health conditions, especially since so many of the medical professionals I have seen have failed to show any scientific knowledge, insight or understanding about my declining health. I am not some flaky nitwit who has just fallen victim to the latest marketing or Google search craze. What an insult to my intelligence, and that of the millions of other people around the world who study, research and use non-pharmaceutical medicines FOR THE BENEFIT of people's wellbeing and health outcomes.

I am fed up with being told that non-pharmaceutical medicines "are not scientifically proven effective".

There are hundreds of years and millions of people's treatments that clearly demonstrate otherwise. If medical/pharmaceutical science cannot "prove" their effectiveness, why aren't they looking at their hypotheses and methodology? The human body is unbelievably complex and medical science does not have all the answers, nor does it understand everything that is happening.

Scientists do not know how salmon find their way back to their birth stream, or how turtles can swim the whole ocean but find their way back to the beach where they were born years after leaving, yet these are accepted as facts.

So why, then, with hundreds if not thousands of years of evidence that natural therapies have been effective, are some in the medical and pharmaceutical fraternity trying to say there is no proof? This is not scientific!!!!! True science takes observed fact and seeks to understand it. The observed fact is that natural medicines and treatments prescribed by experts in their fields have been effective for longer than medical science. They have been painstakingly studied, tested, documented and reviewed, and they work.

If medical science can't prove how they work, THAT DOES NOT CHANGE THE FACT THAT THEY DO! It simply says that medical science is not testing the right theorem, or using the right methodology, or both. You can't just say the observed fact is wrong because you don't like it. That is preposterous, illogical, and unscientific, and I would like the Friends of Science to get that, because they are NO friends of true science at all, just their own writerion which I thought we had left behind in the middle ages. Do they also say that the turtles and salmon can't really find their way home, it is just a fluke? That is equally absurd. THE FACT is not disputable, it is the undeveloped science that doesn't know what to test that should be disputed.

I ask you, why cannot the observed fact and reality of millions who use natural medicines, and the thousands of international scientific studies be treated with respect. Why not support MORE research to find out more about why and how these medicines are effective, instead of denying these facts and dismissing this evidence? And condemning ill people like me to a life of compromised ability and hellish pain.

Is it because natural medicines pose a threat to the major pharmaceutical companies? Because natural medicines are complex, and can't be narrowed down to patentable substances from which corporations can make billions in profits? The cigarette and asbestos industries went down a similar path of "scientific proof" that killed thousands before the science was finally disavowed. Do not let narrow, unethical science get in the way of natural medicines that HELP people.

It is deeply distressing to me that the only medicines that give me any quality of life are dismissed as fake and ineffective, and that I and my doctor should not be allowed to access them.

Every doctor pledges to do no harm.

You are doing great harm by persecuting natural medicines, by threatening integrative doctors and practitioners of holistic health.

Pharmaceutical medicine is VERY POOR at treating chronic illness, which is increasing in number as you know. Natural medicine excels in this area. Why aren't you promoting both, educating people, training practitioners so that a full range of health options are available for all conditions?

And why condemn natural medicine if it doesn't work for someone. I am sick of the hysteria that is whipped up when someone has not been cured or has had an adverse reaction to a natural treatment – because when the same thing happens to people prescribed pharmaceutical medicine, WHICH IT DOES, oh well, we just try something else. But if it was a natural treatment – you want to ban it and stop doctors practicing it? Such double standards are dishonest and manipulative and frankly disgusting, and I expect better of people sworn to aid human well being. A failure of natural medicine doesn't make them ineffective any more than it makes pharmaceutical medicine ineffective, it simple reiterates that human physiology is very complex and there is NO ONE SIZE TO FIT ALL in any treatment pathway.

Natural medicines and treatment modalities should be funded, researched and supported to take their place in a truly inclusive health system, where people like me are not thrown out the "too hard to treat" door, and left to figure it out and treat myself. Where skilled practitioners should have ALL modalities they want to study at their grasp so they can recommend the best treatment and help everyone be WELL.

All medicines need to be treated with equal respect.

All practitioners, whether medical, natural, or integrative, DESERVE the same respect. They are all highly trained and expert in their fields.

When you persecute and discriminate against the only medicines and treatment modalities that improve my health, you are discriminating against me and the thousands and thousands of other Australians suffering debilitating illnesses who have been failed by pharmaceutical treatments.

Stop this insane persecution and support a health system that actually works for everyone.

Yours sincerely,

Sent: Friday, 15 March 2019 6:25 PM

To: medboardconsultation

Subject: Public Consultation on complimentary medicines

To the board.

I suffered severe depression for most of my life (I'm 36) traditional pharmacy did help a little but I offen ended up back in hospital. A year and a half ago I came across a gp that perscribed compounded vitamin and mineral supplements, mostly to raise my zinc level. I now feel significantly better. I have not experienced any side affects, which is amazing as the traditional pharmaceuticals I had been on all had noticeable side effects. I have not needed to go back to hospital and I am now studying to become a primary school teacher.

After many years of suffering it was the alternative approach that worked.

Thanks



The Executive Officer Medical AHPRA GPP Box 9958 MELBOURNE VIC 3001

Dear Sir,

My name is day in the control of the

I am writing to you due to my concern about the AHPRA's proposal to create a new set of regulations governing the practice of "Complementary and Unconventional and Emerging Medicine". I have several chronic health conditions and for some years I have used complementary or unconventional/emerging medicine as an adjunct to standard forms of treatment. Since combining complementary or unconventional/emerging medicine with standard forms of treatment, I have experienced improvements in my health.

As a patient, I highly value the availability of such forms of integrative medicine and have been very pleased with the responsible way that it has been practiced by my professional integrative medical practitioner. My integrative health practitioner is exemplary. They have provided extensive information and have undertaken detailed discussions with me about various treatment options. I have always been able to discuss the relative merits and potential side effects of treatment. As a patient, I have been educated by my integrative medical practitioner to the extent that I have been able to make a highly informed decision as to whether to proceed with integrated treatment or not.

It is of paramount importance that all patients are able to continue to have a FREE CHOICE to make their own informed decisions over their medical treatment, including complementary or unconventional/emerging medicine.

In response to your proposal to create a new set of regulations governing the practice of "Complementary and Unconventional and Emerging Medicine", my preferred choice of outcome would be OPTION 1- to retain the status quo. I do not believe there is a justifiable reason to warrant making any changes.

I strongly disagree to the enactment of OPTION 2. Put succinctly, the effect of the newly proposed regulations will not result in any positive outcomes for patients or responsible integrative health practitioners. In fact, what the proposed new regulations will do is to merely significantly increase the burden of paperwork on integrative medical practitioners. This, in turn, will be passed on to patients in the form of increased fees, which will financially marginalise those who can least afford it. From a financial and social aspect, the burden of chronic disease not only affects patients suffering from illness, but also those closest to the patient. The enactment of OPTION 2 will create more pressure and stress for patients and their families – those who are most vulnerable due to disease burden.

Additionally, the enactment of such regulations will likely reduce the number of medical practitioners who are even willing to practice integrative medicine in Australia to begin with. There will likely be an increase in the number of actions to deregister integrative practitioners who are willing to continue practicing in this specialised area of medicine. This will be a form of a "medical witch-hunt", not dissimilar to the appalling situation that has occurred in the USA in recent decades towards particular groups of medical practitioners.

Overall, the effect of the proposed regulations will be to increase costs and ultimately reduce the free choice of patients over how to treat their illness. Implementation of the proposed regulations have the potential to violate a basic human right — that of access to healthcare. Every person should have the right to consult with a registered medical practitioner and to receive specialised advice and treatment tailored for their specific health care needs, including accessing and considering an integrative medical approach.

Every person should have the right to utilise the best of both orthodox and natural therapies in conjunction with the latest research. Imposing more regulations and red-tape on the practitioners in the system is going to stifle this right and ultimately disadvantage everyone.

I note that the stated reason for your proposed changes is that there have been complaints from a few patients about the standard of care that they have received from particular individual integrative health practitioners. However, what has not been highlighted about this issue is that the complaints made have been no more frequent, and have generally resulted in less severe outcomes, than complaints against other modalities of medical practice.

Additionally, it perplexes me as to why there has been no case made as to why such rare complaints cannot continue to be dealt with under the existing guidelines for good medical practice. It appears that the unstated reason has resulted from a generalised prejudice against the use of non-pharmacological therapies and prejudice against innovation and progressive ideas in emerging medicine. I note that throughout the history of Western Medicine, there have been specific medico-political agendas which have emerged to limit particular integrated/unorthodox therapies. Such examples include treatments for tick-borne diseases such as Lyme disease, as well as acupuncture and stem-cell therapy. What seems to be overlooked time and again under the guise of "putting patient safety first" is that when practiced responsibly, such therapies have improved very sick patients' quality of life or have even reversed disease.

If enacted, your proposed new regulations will merely create a highly discriminatory regime of double standards within the Australian medical system. One set of marginalised integrated medical practitioners will be made to practice under a much stricter set of guidelines than the rest. Such practitioners will be subjected to much harsher scrutiny than the rest and will be subjected to tough disciplinary actions, which will be very stressful and financially crippling, thereby removing them from treating their patients. It will be the patients and their families who will ultimately suffer. Such a system is unequal at best and corrupt at worst.

Such a system undermines the very oath under which all doctors operate: to do no harm. The marginalisation of integrative medical practitioners will ultimately result in fewer practitioners who are willing to practice, and increased costs for those few who are willing to keep practicing. Such a situation will result in some patients being medically abandoned, having no one to treat them, thereby greatly harming them and undermining the Hippocratic oath. It will likely force patients who can afford it to travel overseas, perhaps taking risks in less developed countries to seek integrative medical treatments which they are no longer able to access in their homeland. Such a situation is utterly shameful and deplorable.

In the unfortunate event that you do choose OPTION 2, then I believe that it should be modified from the current proposal to ensure:

- 1. That it applies to ALL medical practitioners (not just integrative 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. This would allow increased Medicare rebates to help cover the increased costs of fulfilling the new regulations.

Thank you for considering this submission.

Yours Sincerely,



The Executive Officer Medical AHPRA GPP Box 9958 MELBOURNE VIC 3001

Dear Sir,

My name is ______. I am 35 years old and reside in New South Wales. I have co-authored this letter with my mother, _____, who shall submit her copy separately.

We are writing to you due to our concern about the AHPRA's proposal to create a new set of regulations governing the practice of "Complementary and Unconventional and Emerging Medicine". I have a chronic health condition and for some years I have used complementary or unconventional/emerging medicine as an adjunct to standard forms of treatment. Since combining complementary or unconventional/emerging medicine with standard forms of treatment, I have experienced improvements in my health.

As a patient, I highly value the availability of such forms of integrative medicine and have been very pleased with the responsible way that it has been practiced by my professional integrative medical practitioner. My integrative health practitioner is exemplary. They have provided extensive information and have undertaken detailed discussions with me about various treatment options. I have always been able to discuss the relative merits and potential side effects of treatment. As a patient, I have been educated by my integrative medical practitioner to the extent that I have been able to make a highly informed decision as to whether to proceed with integrated treatment or not.

It is of paramount importance that all patients are able to continue to have a FREE CHOICE to make their own informed decisions over their medical treatment, including complementary or unconventional/emerging medicine.

In response to your proposal to create a new set of regulations governing the practice of "Complementary and Unconventional and Emerging Medicine", my preferred choice of outcome would be OPTION 1 – to retain the status quo. I do not believe there is a justifiable reason to warrant making any changes.

I strongly disagree to the enactment of OPTION 2. Put succinctly, the effect of the newly proposed regulations will not result in any positive outcomes for patients or responsible integrative health practitioners. In fact, what the proposed new regulations will do is to merely significantly increase the burden of paperwork on integrative medical practitioners. This, in turn, will be passed on to patients in the form of increased fees, which will financially marginalise those who can least afford it. From a financial and social aspect, the burden of chronic disease not only affects patients suffering from illness, but also those closest to the patient. The enactment of OPTION 2 will create more pressure and stress for patients and their families – those who are most vulnerable due to disease burden.

Additionally, the enactment of such regulations will likely reduce the number of medical practitioners who are even willing to practice integrative medicine in Australia to begin with. There will likely be an increase in the number of actions to deregister integrative practitioners who are willing to continue practicing in this specialised area of medicine. This will be a form of a "medical witch-hunt", not dissimilar to the appalling situation that has occurred in the USA in recent decades towards particular groups of medical practitioners.

Overall, the effect of the proposed regulations will be to increase costs and ultimately reduce the free choice of patients over how to treat their illness. Implementation of the proposed regulations have the potential to violate a basic human right — that of access to healthcare. Every person should have the right to consult with a registered medical practitioner and to receive specialised advice and treatment tailored for their specific health care needs, including accessing and considering an integrative medical approach.

Every person should have the right to utilise the best of both orthodox and natural therapies in conjunction with the latest research. Imposing more regulations and red-tape on the practitioners in the system is going to stifle this right and ultimately disadvantage everyone.

I note that the stated reason for your proposed changes is that there have been complaints from a few patients about the standard of care that they have received from particular individual integrative health practitioners. However, what has not been highlighted about this issue is that the complaints made have been no more frequent, and have generally resulted in less severe outcomes, than complaints against other modalities of medical practice.

Additionally, it perplexes me as to why there has been no case made as to why such rare complaints cannot continue to be dealt with under the existing guidelines for good medical practice. It appears that the unstated reason has resulted from a generalised prejudice against the use of non-pharmacological therapies and prejudice against innovation and progressive ideas in emerging medicine. I note that throughout the history of Western Medicine, there have been specific medico-political agendas which have emerged to limit particular integrated/unorthodox therapies. Such examples include treatments for tick-borne diseases such as Lyme disease, as well as acupuncture and stem-cell therapy. What seems to be overlooked time and again under the guise of "putting patient safety first" is that when practiced responsibly, such therapies have improved very sick patients' quality of life or have even reversed disease.

If enacted, your proposed new regulations will merely create a highly discriminatory regime of double standards within the Australian medical system. One set of marginalised integrated medical practitioners will be made to practice under a much stricter set of guidelines than the rest. Such practitioners will be subjected to much harsher scrutiny than the rest and will be subjected to tough disciplinary actions, which will be very stressful and financially crippling, thereby removing them from treating their patients. It will be the patients and their families who will ultimately suffer. Such a system is unequal at best and corrupt at worst.

Such a system undermines the very oath under which all doctors operate: to do no harm. The marginalisation of integrative medical practitioners will ultimately result in fewer practitioners who are willing to practice, and increased costs for those few who are willing to keep practicing. Such a situation will result in some patients being medically abandoned, having no one to treat them, thereby greatly harming them and undermining the Hippocratic oath. It will likely force patients who can afford it to travel overseas, perhaps taking risks in less developed countries to seek integrative medical treatments which they are no longer able to access in their homeland. Such a situation is utterly shameful and deplorable.

In the unfortunate event that you do choose OPTION 2, then I believe that it should be modified from the current proposal to ensure:

- 1. That it applies to ALL medical practitioners (not just integrative 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. This would allow increased Medicare rebates to help cover the increased costs of fulfilling the new regulations.

Thank you for considering this submission.



From: medboardconsultation

Subject: integrative medicine and compounding pharmaceuticals

Date: Friday, 28 June 2019 1:54:09 PM

Hello

I am a regular user of complementary & integrative medicine such as compounded hormones. I have been using a number of supplements and compounded medicine for many years, with great success and after many years using conventional pharmaceuticals, especially hormobes to my detriment, I have come to the conclusion there are no alternative pharmaceutical products for treatments of my conditions which includes colitis, digestive disorders and menopausal symptoms. If they are to be considered any differently, by the government, either removed or higher charges apply, this would be devastating to myself, other family members, colleagues and friends who I know to also use these products with great success. It would seem it is very rare to have serious complications/ side effects from complementary or integrative medicine products.

I would strong urge any politicians to consider the wider consequences of any changes to legislation in this area.

Kind Regards

Name:

Occupation: Business Owner

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

I had been suffering from a painful wrist joint for many years; to the extent I had to give up playing golf and tennis.

Conventional medical doctors had not been able to successfully treat my pain or improve my mobility. Prescribed medication and services did not work and this seemed a waste of my time and Medicare funds.

However, once I saw an integrative medical doctor who included changes to my lifestyle, my diet and supplements to address my problem, my condition improved remarkably. I am now back playing both sports.

As our health care budget continues to blow out, it is clear we need to look at medical intervention with new eyes and so there is a strong case for making access to an integrative doctor easier rather than more difficult!

I strongly believe there is room for both traditional and modern medicine in our society and access to both can only be of benefit to all who seek optimum health.

A concerned citizen

From:
Sent: Saturday, 13 April 2019 2:27 PM

To: medboardconsultation

Subject: Regulation of Medical Practitioners

My name is of some state of should have the right to choose which methods I chose to address my health issues.

I have been suffering with Menopause symptoms which affected my life in all areas.

Conventional general practice has not been able to successfully treat my condition and bring me to a satisfactory outcome.

My condition remained unchanged until I consulted with an integrative medical doctor who included supplements, diet and lifestyle to address my condition.

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

I am very concerned

13th April 2019

Sent: Sunday, 21 April 2019 4:17 PM medboardconsultation

Subject: Consultation on complementary and unconventional medicine and emerging treatments

I am writing as someone who has received great benefit from a Medical treatment administered by a GP which would be considered to be an "emerging treatment" by your proposed definition. Having suffered a chronic illness for decades which was only partially relieved by drug treatment, application by a suitably trained GP[1] of ongoing research into non-drug treatments[2] resulted in dramatic improvements within a very short time. I am now able to function much better than I had ever been able to, with no need for the pharmaceutical medication which had given me limited relief while imposing terrible side-effects.

I have been witness, through my own research and involvement with communities of like-minded people, to the desperation which will drive people suffering from chronic debilitating illness to seek some kind of relief which conventional treatments are unable to offer them. In many cases this relief has been found through the good fortune of finding GPs who either alone or in college[3] are willing to conduct further research than is common in the profession, in finding approaches which show promise in clinical outcomes and which are based on sound scientific principles. The thorough scientific and diagnostic training they received as Medical Doctors was in my opinion a major factor in the success of these treatments.

That these approaches are often as of yet lacking in specifically designed RCT validation for what seems to be mainly financial considerations does not invalidate the great positive outcomes attained and without which these dedicated Medical professionals would be unable to justify putting their Medical registration on the line. As of now these -to me- brave souls are intensely aware of the scrutiny[4] under which they already operate and of the fine line they tread which demands even more rigour on their part than would be normally applicable. I am eternally grateful personally for this bravery and rigour which is why I write to you.

I am hoping that whatever your decision will be, these approaches are not further discouraged as there seems to be no reason to do so given the pressures already existing on these fine professionals. I shudder to think my own relief would not have been available from a practitioner with such skill under more draconian regulations in this area.

- [1] http://www.biobalance.org.au/events
- [2] https://www.health.harvard.edu/blog/nutritional-psychiatry-your-brain-on-food-201511168626
- [3] https://www.acnem.org/
- [4] http://www.bmj.com/content/316/7146/1694.3

Faithfully,

Sent: Sunday, 30 June 2019 4:53 PM

To: medboardconsultation

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

Submission on the public consultation on complementary and unconventional medicine and emerging treatments.

Submission in support of Option 1, retaining 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.

As someone who lives with severe Myalgic Encephalomyelitis/Chronic Fatigue Syndrome (ME/CFS), access to off-label treatments has improved my quality of life significantly.

After my diagnosis of ME/CFS in 2017, I underwent the conventional recommended treatments of Graded Exercise Therapy (GET) and Cognitive Behavioural Therapy (CBT); whilst it is broadly understood that these recommendations are out of date with current knowledge of ME/CFS, they remain the only officially recognised treatment options in Australia. Undertaking GET and CBT resulted in a permanent decline in my condition, from moderately severe to severe, and I am now mostly bedbound in addition to being housebound.

My symptomatic experience of ME/CFS includes extreme fatigue, orthostatic intolerance, cognitive dysfunction, persistent nausea, and muscle pain. The paucity of available treatments for ME/CFS means I am reliant on small and incremental interventions to manage my symptoms and improve my quality of life. Treatments I have accessed through my doctors that have improved my quality of life are: vitamin B12 injections, probiotics (practitioner grade), and low dose naltrexone. Vitamin B12 injections increase my stamina for short periods of time, allowing me to attend important family events or meet personal administrative requirements (such as finalising welfare applications).

Probiotics have helped to temper the nausea and gut symptoms I experience, when taken in combination with a carefully managed diet.

I began taking low dose naltrexone a couple of months ago, and I have noticed a significant reduction in the pain I experience on a daily basis, and my stamina and strength have improved. It has also reduced the severity of my cognitive dysfunction. Importantly, the improvement in my cognition has made it much easier to manage my condition. This is the first significant improvement in my condition that I have experienced.

Given the lack of conventional treatments for ME/CFS, access to emerging treatments is the only pathway to any kind of treatment in the foreseeable future. Were the Medical Board to proceed with the proposal to restrict access to emerging treatments, this would have a significantly detrimental impact on my quality of life.

More broadly, it seems the proposed guidelines are likely to drastically reduce freedom of choice and access to appropriate care for a great many patients who, like me, live with poorly understood conditions.

Sunday, 30 June 2019 7:02 PM

To:

medboardconsultation

Subject:

Public consultation on complementary and unconventional medicine and emerging treatments

Submission in support of Option 1, retaining 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.

As the sibling and secondary carer of someone who lives with severe Myalgic Encephalomyelitis/Chronic Fatigue Syndrome (ME/CFS), I can see that having access to off-label treatments has improved her quality of life significantly.

The initial treatments of Graded Exercise Therapy (GET) and Cognitive Behavioural Therapy (CBT) were not only unhelpful, but actually resulted in a decline in her condition from moderately severe to severe, and she now finds herself mostly bedbound in addition to being housebound. Whereas, working with her GP and relevant specialists has meant she can try a more nuanced and personalised approach to her treatment and this has resulted in treatments such vitamin B12 injections, probiotics (practitioner grade), and low dose naltrexone which have all had a much greater quality of life improvement than the official treatments of CBT and GET.

Given the lack of conventional treatments for ME/CFS, access to emerging treatments is the only pathway to any kind of treatment in the foreseeable future. Were the Medical Board to proceed with the proposal to restrict access to emerging treatments, this would have a significantly detrimental impact on my sister's quality of life.

More broadly, it seems the proposed guidelines are likely to drastically reduce freedom of choice and access to appropriate care for a great many patients who live with poorly understood conditions, such as ME/CFS, where much more research is required to find appropriate treatments.

Thank you for taking the time to review my submission.

Kind regards,

To the medical board. & local parliament member steve Mc Ghie,

RE. Opposing the censorship and abolition of integrative medicine in Australia.

I am a shocked and appalled Australian citizen, that my right to access integrative medicine is currently under threat. Regular medical doctors do not have a hope of being able to help me treat my extremely complex and chronic health conditions (of which there are many). While I do believe that regular medical doctors do have their place, I need a full spectrum of options in order to attempt to successfully treat and manage my conditions.

People like me with CFS, fibromyalgia, leaky gut syndrome, and other people with degenerative conditions, and also tick-borne illnesses, in particular require the services of these integrative GPs. This is especially the case for people with autoimmune illnesses and, like me, mast cell activation syndrome, people with multiple chemical sensitivities and multiple allergies that need to have options, and without these options, could and will in some cases have a deadly outcome. Taking away our right to integrative medicine is essentially hammering more nails into our coffins. It is dealing another blow when we are already down.

Additionally, I am allergic to many medicines and can have adverse reactions, I have almost died four times for the use of prescription medication, which caused both heart and breathing problems, and this was on a children's dosage. This was the only effective medicine for this particular application of heavy metal poisoning and the only other options left to me are herbal medicines. Also, it was prescription medicine of Valium that wore away the lining of my stomach, creating an illness called leaky gut syndrome, which was diagnosed by an intestinal permeability test, and I am happy to provide evidence of this if needed.

The only treatment for this leaky gut syndrome has to be approached with natural herbal medicine and even some of these natural supplements I have reactions to underlining my need for many options! With great success, I have been able to significantly improve my heart condition of POTS with the use of herbal and natural medicine, otherwise this condition is a lot more debilitating to deal with and I cannot tolerate any prescription medicines to manage this condition. It is simply too dangerous and too much for my body to handle. I am extremely sick, sensitive and allergic to practically all prescription medicines because of the included chemicals and the allergic reactions that I have, and normal GPs are simply not educated or qualified enough to treat someone with my health picture and the life-threatening illness that I have.

Everyone's genetic predisposition is completely different and one does not know how someone will react to herbal medicines as opposed to prescription medicines. There are extensive warnings and precautions and contraindications on every prescription medicine for a reason, and even healthy people have a right to choose whether they want to avoid all these unwanted side-effects.

I also have a Lyme-like illness and it is now known that Richard Horowitz Lyme-MSIDS questionnaire does hold up in a court of law, so this does not make sense that the government is creating a double standard where people with a Lyme-like illness cannot be treated for their Lyme-like illnesses.

I have personally found that integrative GPs are extremely valuable as they are able to look at my illness with a holistic perspective that is second-to-none, and they go far beyond the parameters of what a usual GP can offer in terms of knowledge and treatment. An integrative GP is the only GP

that has been able to help me alleviate my suffering and manage my many illnesses, and my life would be considerably at risk without their assistance, and people like me would be more likely to commit suicide as a result of not having integrative GPs (or perhaps end up in a worse state because of mismanagement of their illnesses). The only improvement I have had has been due to integrative medical doctors who have advised me on a large range of different treatments, including: changing my diet; recommending herbal and natural supplements (and vitamins and minerals); and introducing different technologies, tests and lifestyle modifications. These have been the only things that have helped me to manage and even improve my health.

If my integrative doctors are restricted and not able to give me medicine and recommendations that I desperately need, I will end up dead, in a hospital, committing suicide, euthanised and my health worsening beyond belief. This will ultimately impact the healthcare system even more, as people with chronic illnesses like myself will require more full-time care, and the negative affects will also impact their families. It will mean that only the rich will afford to fly overseas and have consultations with integrative GPs overseas, as this is not covered by Medicare in this country, this means people who live in poverty (like myself), will not have access to the integrative GPs that they need.

I don't understand why this is even happening? From where I am standing it is either cruelty, indifference, or the medical board is unduly biased towards drug manufacturers. Please feel free to write back to me and inform me which of these is the case. As an Australian citizen, I have a right to know and I don't deserve to be treated this way.

I just can't over the fact that Lyme disease or a Lyme-like disease, which is more appropriately called Multiple Systemic Infectious Disease Syndrome (MSIDS), is not recognised here in this country regardless of the evidence that was found in ticks as early as 1969, and was also confirmed again in 1994, that borrelia burgdorferi exists in Australia as outlined in Rosemary Munro's article (October 1989). Furthermore, I find it difficult to understand how, at the start of the year, the Australian government denied funding for research into tick-formed disease, and that this country does not provide hyperbaric chamber treatment for Lyme-like disease or hyperthermia. With all of these issues stacked against us, this is essentially the final death blow of taking away our access and options regarding integrative GPs. These are the only specialists that can help me and others like me. If this happens, this medical board should be deeply ashamed.

