Sent: Thursday, 14 March 2019 1:15 PM

To: medboardconsultation

Subject: Consultation on complementary and unconventional medicine and emerging treatments

Medical Board Submission

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

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

I have been suffering from fatigue and my son has been suffering from encopresis for five years.

Conventional medical doctors have not been able to successfully treat my or my son's condition and bring us to a satisfactory level of health.

The use of conventional methods for my son of laxatives and regular hospitalised bowel washouts simply did not work. This was definitely a waste of our time and Medicare funds and resources.

It was only when I saw and integrative medical doctor who included lifestyle changes, diet and supplements of vitamins and minerals to address our problems did our conditions began to improve.

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

Concerned,

Kind regards,

I choose Option 1. Not only do the proposed measures against treatment of tick borne illness go against the 2016 Senate Inquiry on the topic. they directly contradict them. To quote a 2016 Senate Inquiry on Lyme Disease (whose findings directly contradict your proposed measures); "the committee is persuaded that emerging diseases require safe and responsible treatment even when the science is in progress. Notwithstanding the absence of definitive answers on what the responsible pathogens are, it is the committee's view that medical authorities and doctors have a responsibility to address and treat illness. The patients are not responsible for the absence of vital research establishing which pathogens carried by which vectors are responsible for Lyme-like illness—this evidence is needed, and urgently, but so is treatment for patients who are unwell now." More evidence is needed so that these people MIGHT BE TREATED. These measures do no such thing, and only deny them further access to measures that might save their lives and livelihood. It is negligent, it is unprofessional, and it goes directly against the Hypocratic oath.

In addition, by your very own standards of proof most psychiatric treatments and pills (which are known globally even amongst psychologists and psychiatrists alike to have incredibly low efficacy rates that are barely higher than placebo) should be removed as well, for being """unscientific.""" These are new areas of study, that require more research, not over regulation and shutting down of practicing integrated doctors. Not everything can be measured in your incredibly specific way of proving true things, and the utter arrogance in assuming your method of evaluating truth propositions is flawless is a. so unscientific, and free of actual scientific skepticism, it would have Descartes rolling in his grave and b. so philosophically flawed it might count as a form of logical delusion.

I'm writing this because I have very close people in my life suffering from Lyme. Who have suffered years and years on end, told at every turn they're a hypochondriac (an outcome far more preferable than lyme disease). Who have gotten better on antibiotics, and while said treatment is not flawless, what is the alternative? To lay down and waste away because there's not enough proof? If someone's life is on the line, they should have the right to use any means necessary to try and fix it. After all, what do they have to lose? This is ideological, and it does not have a place in medicine.

From: medboardconsultation

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

Date: Sunday, 30 June 2019 11:25:04 AM

To whom it may concern,

I, protest the motion for you to remove my right to be informed of complementary & natural therapies & emerging treatments when receiving public consultation.

I personally have suffered greatly at the hands of GPs who repeatedly prescribed antibiotics without ever investigating the root cause of my chronic tonsillitis. This led to total antibiotic resistance, a tonsillectomy & the complete destruction of my gut microbiome.

My health suffered significantly as a result, with on-going digestive & hormone related issues, cystic acne & terrible depression that lasted 5yrs.

I was advised by the same GPs to remain on the OCP for over 13yrs in a bid to 'bandaid' my hormonal issues. Not one GP ever suggested dietary changes or natural medicine as options for treatment of my issues, their only recommendation ever was more medications to 'manage' not 'cure' my condition, and all the medications recommended caused even more negative side-effects.

It was not until I took my health into my own hands, changed my diet and enlisted the help of natural therapists & remedies that I have been able to turn my health around and live totally free of pharmaceutical medications & pain killers.

I sincerely hope that one day the content of all formal, University Medical Degrees will once again focus heavily on nutrition, natural therapies & PREVENTION, as they did many years ago- before they became soley focused on Diagnosis & Pharmaceutical drug 'management.'

Sincerely

Sent: Tuesday, 4 June 2019 12:58 PM

To: medboardconsultation

Subject: re: comp. and alternative medicine in practice.

Dear Sir/Madam,

I would like you to know that all my doctors in the past and presently have given me alternative medicine together with good advice and drugs. The alternative medicine was very helpful in helping me attain health without added cost to the Government and thus the nation.

I think if you are going down this path that you propose, you will simply have to get rid of approximately 30% of your registered doctors. Further why did my Cardiologist prescribe Magnesium supplements. By the way they were most effective. I think you will want to get ride of the expert also. This will be a sad state of affairs.

As for nutritionists and Naturopaths who hold degrees - well that's the end of careers for them. Please note these degrees are Government accredited degrees. So take that aspect into consideration.

I hope you don't make yourself hated by the public who are well aware of alternative medicine. Get with the times and the program. Stupid decision cause unforeseen consequences.

Thank you for reading this and taking it into consideration.

I have been taking compounded hormones for 10 years. I have annual blood tests to make sure I am taking the correct dosages. I have been offered standard medication which would be much cheaper but I am going very well on these hormones and would like to keep on taking them.

Consultation on complementary and unconventional medicine and emerging treatments SUBMISSION

I have been the patient of an integrative doctor for eleven years. My doctor is very supportive and is committed to long-term management of my very complex chronic illness. He has a deep understanding of chronic fatigue syndrome. If I develop new symptoms, he has seen it before in other patients and knows what to do about it. Before I started seeing my integrative doctor, I saw a lot of specialist doctors. They only wanted to see me for one appointment. They had no idea about my condition and no helpful treatment suggestions. Some of them were very rude. I have improved on unconventional treatments with my integrative doctor. I think that people for whom mainstream medicine has no answers should be able to choose to try unconventional treatments. I would be extremely upset and it would be a big blow to my health if my integrative doctor is prevented from practising as he does at the moment.

Sent: Monday, 8 April 2019 3:47 PM

To: medboardconsultation

Subject: Feedback

Hello,

I am wanting to give feedback in regard to the regulation of medical practitioners who provide complementary and unconventional and emerging treatments.

My biggest fear is that the access to these treasured medical practitioners and the way they practice will be stifled or given less freedom by the new codes and guidelines.

My experience has been life changing. I was bed ridden and on centerlink payments for years. My bio medical doctor was able to give me my life back by gently supporting my immune system and providing compounding medicines that enabled me to not only join back to the work force full time but have two children as well.

I am worried that bio medicsl doctors will not be able to prescribe the medicines they know will help due to the restrictions placed on them. This will also affect compounding pharmacies which are most important for sensitive people like myself (so I can order items without colours or preservatives).

I would also like to comment on the fiancial hardship that the new amendments to the health funds (no homeopathy, pilates etc) has made on me and my family.

I am hoping that this generation (this board I am writing too) will make good decisions which will help our following generations to have access to health alternatives that are not just from a text book and won't be swayed by pharmaceutical bodies who have big money to put into research to prove that their drugs work!

Please consider what restrictions you are making and the impact it has on our citizens health.

From: Sent:

Thursday, 13 June 2019 2:23 PM

To:

medboardconsultation

Subject:

Personal Experience of Integrative Medical Treatment

To whom it may concern

For many years I have been treated by a medical doctor who specialises in integrative medicine. I believe I have been very fortunate to do so.

If I require pharmaceutical prescription medication for the condition being treated, she prescribes it eg thyroid. This is the supplemented with a compounding chemist mixture and a supplement purchased from a vitamin store.

For sleeping problems, I have a compounding chemist mixture, which is effective, rather than sleeping pills.

But, if the health problem I presented with, required drugs, she would prescribe them. I have absolute faith in her judgement and expertise.

She also supports the meditation I do. Plus encourages exercise. I have liver disease which has responded exceptionally well to caffeine enema treatment. This treatment has also improved other health areas eg thyroid. This is checked by blood tests.

She also encourages seeing a GP for breast cancer tests, pap smears etc, which I do regularly. I understand this, as these are not the areas she concentrates on.

In conclusion, I feel extremely fortunate to have a doctor so dedicated and highly qualified. One who will prescribe pharmaceutical medications if required, but whose focus is on compounding chemist treatments and vitamin/mineral supplements.

Thank you for considering my experience.

Yours faithfully

Sent: Tuesday, 16 April 2019 3:29 PM

To: medboardconsultation

Subject: Submission to MBA Consultation document on complementary and unconventional medicine

and emerging treatments.

My name is 44 years old.

I developed a thyroid condition due to an extremely stressful and abusing marriage.

I was prescribed conventional medication for this and then when I began seeing an integrative health practitioner, I was able to heal my gut, lover my conventional medication and use supplements to help my thyroid and stress levels.

Being able to use natural remedies which have been around for hundreds of years and that will not affect my gut has been profound for my health.

Regards

Sent: Friday, 5 April 2019 9:15 PM

To: medboardconsultation

Subject: Possible changes to regulations regarding compound medicines

I rely very heavily on medicines prescribed by my GP and prepared by my compounding pharmacist. I have been using such treatments for probably about 20 years. The prescription is formulated from a blood test every 6 months and varied as required.

The capsules and cream I use are mainly for the treatment of menopause and contain hormones and vitamins. Without them, my general health and wellbeing would suffer greatly and it would therefore put an enormous strain on my marriage, as it did before I commenced treatment. The thought of not being able to access this treatment truly scares me.

Regards

Sent: Thursday, 27 June 2019 8:57 AM

To: medboardconsultation

Subject: Submission re Integrative health specialists

I would like to make a submission to this panel

I use an integrative medicine doctor as I have complex chronic health issues.

My GP often says I cant help you with that.

I have had many precursor illness's resulting in multiple allergies and chronic pain and debilitating inflammation.

My intergrative medicine doctor has studied these patterns of symptoms and the background causes and has helped me where no one else has been able to.

He does not over test or overprescribe but tried to allow me to live a life.

Without his care I am unable to have a life outside of home and energy levels.

With new symptons occurring I need consistent help with my health.

Sometimes a natural supplement can help and these are only

practitioner supplied, made to a high standard in Australia.

If you disallow these supplements then we will all just go online to

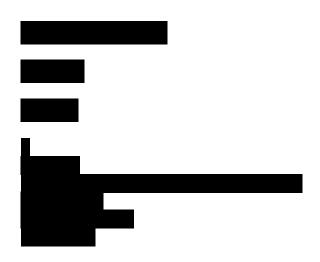
buy them and get varied quality supplements and some supplements that could be badly made or often contain little of the ingredients expected .

My doctor has only prescribed a few of these not multiple and many and varied.

In Australia we have a rising issue with allergies and these doctors help with these issues and management of our chronic health issues.

These integrative doctors are specialists in the more obscure chronic illness.

I ask that you do not restrict doctors who use these methods.



From: Sent:

Monday, 8 April 2019 5:45 PM

To:

medboardconsultation

Subject:

Consultation on complementary and unconventional medicine and emerging treatments

Dear Sir/Madam,

As someone who has used complementary medicine for the past 30+ years, I find it deeply concerning that the Medical Board is looking to impose greater regulation around the use of integrative, complementary and alternative medicines (CAMs), which may result in the restraint of the practice of integrative medicine and the use of CAM modalities.

I myself have benefitted enormously from the use of alternative and complementary medicines, and I rely heavily on medical practitioners to assist with this.

I strongly urge you to proceed with Option one – to retain the status quo of providing general guidance about the Board's expectations of medical practitioners who provide complementary and unconventional medicine and emerging treatments via the Board's approved code of conduct.

Yours sincerely,

Sent: Friday, 28 June 2019 11:53 AM

To: medboardconsultation

Subject: Consultation on complementary and unconventional medicine and emerging treatments

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

I have benefitted enormously from seeing Integrative Medicine doctors for over 30 years for myself, my children, and both my parents. My entire family have used both conventional and integrative medicine doctors, as well as alternative health practitioners, and without the full choice of health options, we would have struggled through serious illnesses and be much worse off in many many ways. To remove such a choice from the individual and from medical practitioners, not only takes Australia into a 'nanny state', but also removes freedom of choice at the most fundamental level.

Conventional medicine does not have all the answers. It does not take a holistic approach. It does not provide the time needed to delve deeper into the root cause of all medical problems. It is a system based on diagnosis and the prescription of pharmaceuticals and ignores the immense wealth of well grounded health principles used in integrative and 'alternative' medicine that have far greater history than that of 'modern' medicine.

There is absolutely no reason for a shutting down of these holistic, alternative, integrative options in our medical system. The amount of 'harm' being caused by them is miniscule in comparison to the number of side effects and even deaths caused through the use of conventional medicines. If anything, conventional medicine should be under scrutiny here, not the other way round. The fact that medicinal cannabis has not been readily adopted by the medical fraternity for health issues where there is an overwhelming evidence base of the benefits of its use, is to me an appalling cause of needless harm to those in need, and a stubborn arrogant refusal of the medical board to be open to natural treatments where modern medicine does not have all the answers.

I do not ascribe to the use of chemical drugs when there are more natural alternatives available to help bring the body back into balance and a state of homeostasis, without the risk of negative side effects. And more than anything, it takes time for doctors to fully look at a person's medical picture. Something that 15 minute doctor appointments do not afford under the proposed system.

I am happy to see my GP for simple issues that require a prescription or referral to a specialist. But I strongly disagree with the proposed changes and the loss of freedom this will create for all concerned.

There has been no transparency in this process. I have friends who are caring medical doctors and they are feeling pressured by the Medical Board to not service their patients to the best of their ability. I do not believe this is a healthy democratic move and I feel deeply disturbed that such moves are going on behind the scenes without full public disclosure and consultation. One can only assume that this is more

about big pharma business than it is about heartfelt holistic patient medical care and consideration.

Stop regulating complementary and integrative medicine and diminishing the health care options available to the Australian public! We have the right to make our own personal choices!

Regards,

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

My name is	I am a 67 year old male. I can be contacted at	. This is my
story.		

For most of my life I have had a degree of anxiety. In the main this had no significant effect on my life. This all changed dramatically in my early-40s. There was talk of restructuring at work that caused my anxiety levels to shoot through the roof. The result of this was that one morning on my way to work I suffered a panic attack. I had no idea what was happening to me and thinking that I was having a heart attack stopped the bus I was travelling on and was taken to hospital by ambulance. So began a disappointing journey with conventional medical practitioners.

After finding nothing really wrong with me, the hospital staff informed me that I had probably just had a panic attack. No-one told me what a panic attack was, what caused it and how to prevent it. Thankfully I learned the answers to these questions from non-medical sources a few days later. This enabled me to deal with a second attack that occurred in the following week and I have not had one since. That is the good news.

The bad news was the residual problems. In hind sight I think I was on the edge of mineral and vitamin deficiency and the panic attack pushed me over. After the attack I continued to suffer symptoms of extreme anxiety. The muscles in my entire body felt like they were trembling. Because you could not see any tremor externally I called them micro-tremors. The micro-tremors were continuous – 24/7. This made it difficult to sleep and I felt continuously exhausted. Going to work took a Herculean effort. In addition to this my chest felt as though it was a clockwork toy spring that had been wound tight. Needless to say I felt so miserable and tired that it didn't take long to slip into a black hole of depression.

I sought help from a couple of different conventional doctors. I was also referred to a respected psychiatrist. The treatment prescribed from all of these professionals was conventional — antidepressants (a couple of different types) and sedatives (alprazolam). None of these treatments helped. The antidepressants made me feel nauseous and at best cheerfully miserable. This misery continued for many months.

The first glimmer of hope came from a chiropractor who also had a degree in biochemistry. I had gone to him for treatment of a back issue that he successfully dealt with. He then asked if there were any other issues so I told him of my anxiety problems. He immediately put me onto Zinc and Vitamin B6 (Pyridoxal 5-phosphate) supplements. This finally had some effect and my symptoms diminished.

After some further time, my wife found an Integrative Medicine doctor – a doctor who looked outside of the square – and I went for a consult. The doctor was wonderfully empathetic and supportive which was really appreciated give the emotional mess I was in at the time. The first consult was a long one so that she could properly gain my history. At the end of the consult she told

me that she believed I had pyroluria and had me provide a urine sample for confirmation. The test results showed this diagnosis to be correct. Pyroluria causes the body to excrete excessively high amounts of Zinc and Vitamin B6. I know that many in the medical profession do not recognise this as a condition but the symptoms were very real. The treatment was fairly high doses of Zinc and Vitamin B6 (activated P5P form) together with Copper to keep things in balance. To keep track of my Zinc levels the doctor had me do blood tests 6 monthly and then annually.

The effects of this treatment were profound. The micro tremors ceased, my chest no longer felt tight, the depression vanished and my anxiety levels dropped. There were no side effects. Pyrolurea is not curable as it is the result of a faulty metabolic pathway caused by a genetic defect. Therefore I continue with the treatment and the results remain positive. I am forever in debt to this doctor who gave me my life back and possibly prevented me from losing it — the depression was pretty bad.

I have written this submission because I strongly believe that medical standards should be viewed as a starting point, not a limiting wall. Standardization of diagnoses and treatments may have merit from financial and litigious points of view but fails to recognise that we don't all fit into a standard mould. It should also be noted that the arguments regarding costs for extended consultations and testing need to be offset by the reduction in costs associated with no longer needing drugs and psychological and/or medical support for the conditions not properly treated by conventional approaches. We really do need more doctors who are prepared to look beyond the standard viewpoint. After all, isn't this what science is all about?

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

I am a 63 year	old female.
Email address:	

Main longterm health problem: Underactive Thyroid

Prior to finding an Integrative Health Practitioner, I had a small goitre, was overweight, depressed, constipated, felt cold a lot of the time, had dry skin, thinning hair and had dry sore eyes. By age 51 I had continual heavy menstruation and felt terrible.

Although I had been tested a number of times for TSH readings, I kept being told that I was in the healthy range for this reading, despite having many symptoms of thyroid inadequacy.

When my Integrative Health practitioner put me on compounded T3, I immediately felt markedly better. Many of the previous symptoms cleared up, and I felt much healthier and happier. My health improved again when I started to take Natural Dessicated Thyroid extract, rather than synthetic products.

I have been seeing an Integrative Health Practitioner for the past 12 years, and the difference they have made to my health and happiness is enormous, and also to the health of my husband.

I appreciate the fact that they take the time to listen to you carefully, don't rush you out the door after 10 minutes, and are cautious in their approaches so try to get available facts by use of judicious testing to inform their diagnoses.

I value greatly that Integrative Health Practitioners treat you as a whole person, and do not focus solely just on a symptom you may be presenting with on the day.

I value greatly that they try to understand and address the underlying imbalances in my body that are contributing to illness, by supplying the natural elements my body needs to heal and bring itself back into balance where possible, and using toxic drugs as a last resort.

For me Integrative Medicine has given me back my life, and I am so grateful for this new fresh look at practising medicine.

Although it may cost a little more than a standard Doctor consultation, and some of the products I take are not subsidised, the outcomes have been worth far more than the expenditure to my family.

With an increasingly educated community turning to natural products where possible to manage their health, the Integrative Medical Practitioners are the vanguard for where I hope the whole of our medical system will evolve to: i.e. prevention of illness firstly, and treatment by natural means wherever possible when imbalances arise.

It is well known that over time, historically many of the methods adopted by the medical profession have later been proven to be most harmful, such as bleeding patients. In more recent years many of the drugs given to patients are known to be toxic, usually with harmful side effects, and indeed have proven fatal to some patients.

I fear we may become stuck in a medical time warp, or one dictated by pharmaceutical companies who have an obvious commercial agenda if all doctors are given edicts about the one way they must treat patients for any given condition.

I question the need for changes to the existing regulatory framework as laid out in 'Good Medical Practice; A Code of Conduct for Doctors in Australia which I believe currently adequately regulates doctors' practise and protects patient safety.

Who will determine and how, what is 'conventional' and 'unconventional' medical practice? This lack of clarity in the definition of these terms can be mis-used by people with professional differences of opinion and result in unwarranted and vexatious complaints against practitioners who are successfully treating patients, as has already occurred.

Other words not adequately defined in this discussion paper are: 'inappropriate use' and 'emerging treatments'.

Integrative medicine is grouped with 'unconventional medicine' which can imply that integrative medicine is fringe medicine, rather than medicine based in evidence, which I do not believe to be the case.

I would like to strongly advocate for a reasonable time of consultation to occur with Integrative Health Doctors on this discussion paper, and informed amendments made as a result of those discussions, as I understand there was no consultation with Integrative Medicine practitioners or the complementary medicine community before this document was released.

I wish to advocate that Integrative Health Doctors be allowed to continue to treat their patients holistically, with proven therapies, as these have been very beneficial to my health and quality of life.

I strongly advocate for my right to exercise the freedom to seek and find a medical practitioner who can actually assist me to wellness, which I have found with integrative health practitioners, and which I did not find elsewhere in the medical community over decades of consultations.

Thank you for your consideration of these points in your ongoing consultation processes.

Thursday, 4 April 2019 12:06 AM

Sent:

medboardconsultation

Subject:

Public consultation on complementary and unconventional medicine and emerging treatments

I am shocked and disappointed by the current assault on medical practitioners, pharmacists and individuals seeking help for health issues via non-orthodox Western allopathic medical routes for a number of reasons:

- 1 It will significantly reduce the number of treatments available for patients, especially those for whom western allopathic medicine is unable to help.
- 2 It assumes that only allopathic medicine can be of any use to sick patients.
- 3 It will deny the right for doctors to deal with patients according to their own discretion (and they are the ones on the coal face of dealing with patients).
- 4 It denies patients the right to seek out practitioners other than those who practise mainly pharmacological based medicine.
- 5 Many thousands of patients will lose the little help they are currently able to find for illnesses with which western allopathic medicine is completely unable to help, such as Chronic Fatigue, Lyme like illnesses, CIRS mould illness etc.
- 6 It is against the academic tradition of open-mindedness.
- 7 New medical research takes approximately 20 years to filter into the average GP or doctor's practise too late for many patients, whereas there are doctors who see the patients as they need help and work with them based on how they present. The ability to do this in non-conventional ways will be significantly reduced.

My story as submitted to the Australian Biotoxin Inquiry 2018

In summary: I have been ill since 2009 with a series of terrible symptoms which have affected numerous body systems, GI tract, respiratory, neurological, immune system, nervous system, various organs, skin and hair. Despite seeing numerous public health and privately paid specialists during this time they were all at a loss to explain these issues and all, without exception, were unable to help me with the operation and other drug based treatments they offered, until I saw a doctor who was giving non-conventional (lengthy) consultations and which led to my finally getting a diagnosis. I was diagnosed with CIRS (mould illness) and Multiple Chemical Sensitivites – illnesses not understood or widely accepted by western medicine. However, it is only since getting these diagnoses and undertaking a number of non-conventional treatments that I have finally been able to stop or significantly reduce a number of these symptoms and have a significantly less pain filled and sickly existence.

If you take away the rights of these doctors to practise medicine which they see works, especially when all else has failed, you will condemn the many thousands of people like myself to a very terrible existence.

From: Sent:

Tuesday, 28 May 2019 5:28 PM

To:

medboardconsultation

Subject:

Complementary and unconventional medicines and Treatments

To Whom it may concern,

We have chosen option 1 (one).

We are very concerned that these proposed changes are going to impact greatly on our right to choose and access these medicines and treatments. We are also very concerned of the cost that these changes ARE going to inevitably add to health care consultations.

My wife suffers from ME/CFS and Fibromyalgia & MCS (for 15yrs) for which I might add has had, by far, too little government funding into research for these horrid, debilitating illnesses.

As there is no cure and no specific treatments or medication for these Medical Conditions. Medical practitioners can only treat the many symptoms that are associated with it, and so she is reliant upon some of these complementary medicines and treatments to make her days and nights as bearable as possible.

So our vote undoubtably goes with the Status Quo.

Regards

(Husband & Carer)

Medical Board Submission

Regarding the public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments, I wish to advise that as an Australian citizen I feel it's important that I have the **freedom of choice** in the type of medical care that I use to address my chronic health issues.

I am a registered nurse at a busy university hospital and interact with patients with chronic diseases daily. Many of these patients would benefit from simple lifestyle changes that their over-worked doctors simply do not have time to discuss. As a nurse at the bedside of the patient, I also do not have time to enter into discussions about lifestyle changes that may provide some easing and improvement of symptoms.

I feel that integrative medicine has a very important role to play in assisting patients to make changes in their diet and lifestyle which can bring some relief e.g. dietary changes, increasing gentle exercise, massage and use of essential oils.

Conventional methods and pharmaceuticals have their place but from my experience, there are simple things we can do to temporarily relieve pain and suffering by using non-toxic substances.

These therapies will never replace the care given by our medical practitioners but many of those therapies do not relieve the condition entirely or the side effects cause the patient to suffer a different set of problems.

Over the 30 odd years that I have been working as a nurse, I have seen the need for alternative therapies for patients with chronic conditions such as IBS who benefit from dietary changes and patients with severe oedema who get some relief from lymphatic massage with essential oils. Naturally these patients continue with their conventional treatments under the care of their doctor but I believe the length of their hospital stay can be shortened by integrative therapies.

Please allow integrative doctors to continue to assist people who choose to use some alternative therapies like vitamin and mineral support, diet changes, natural progesterone supplementation etc.

Working with integrative practitioners, and other alternative health care workers can really assist the overworked MD's with chronically ill patients.

I myself will visit an integrative doctor when I need to. I want to exercise my choices for healthcare. Despite the fact that conventional medicine offers exemplary acute care, the current chronic is primarily pharmaceutical based. I prefer to keep these pharmaceuticals as a last resort, due to their addictive properties and the side effects which usually present in some form.

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

and my wellbeing.				,	,,	,	-
Concerned,							

Name:

5/4/2019

Sent: Thursday, 4 April 2019 7:33 PM

To: medboardconsultation **Subject:** Stem cell treatments.

Dear sir/ madam.

The proposed restrictions into stemcell treatment is the ultimate insult to my intelligence.

My own suscessful experiences tell a completely different story to what the medical profession are proposing. If i had followed conventional medicine I would not be here to tell my story.

But I am here and only because I went with alternative medical procedures namely stemcell treatment. In addition to my own experiences, I personally know several people who choose stemcell treatment in preference to knee replacements. The end results of stemcell speaks volumes without the agony of knee replacement which has limited results.

This proposal to halt stemcell treatment is nothing more than the medical profession being driven by their self serving agends.

A successful recipient of stemcell treatment.

I'll simply refer my friends to other countries where the medical profession is not consumed by stupidity and greed.

Sent from my Samsung Mobile on the Telstra Mobile Network

From: Sent:

Tuesday, 11 June 2019 4:49 PM

To:

medboardconsultation

Subject:

Public Consultation on complementary and unconventional medicine and emerging treatments

I wish to make a submission for the public consultation on complementary and unconventional medicine and emerging treatments.

I am a 64 year old high school mathematics teacher who had to retire early 14 years ago due to ill-health.

My father was a general practitioner so I had the advantage of appropriate medical treatment to help me. My medical issues started as a preschooler and have worsened through the various stages of my life.

During my life I have been treated by

- General Practitioners
- Allergy Specialists
- An Ear, Nose and Throat Specialist
- An Immunologist
- A Gynaecologist and Obstetrician
- A Rheumatologist
- A Physician
- A Gastroenterologist
- An Opthalmic Surgeon
- A Psychiatrist
- A Dietician
- A Physiotherapist
- and A Speech Therapist

I have benefited from some of the treatments provided by these health professionals. Many of the professionals were unable to help me at all. Many gave me the impression that because they had no suitable treatment for me it meant that my issues did not exist. I went to the psychiatrist and psychologist in case my issues were psychological but that didn't turn out to be the case.

By far the greatest improvement in my health has occurred because of treatment from two integrative general practitioners during the last 18 months. After a lifetime of frustration and acceptance of poor health it has been amazing to start to feel well. I am now starting to understand how sick I have been because I can contrast it with days when I feel well.

I now have hope that I can continue to improve my health. These integrative doctors have been using pathology test results to give direction to their treatments. I have confidence in their treatments because I have seen that their guidance actually works. I am now sleeping better at night, waking up alert and have been able to participate in many more activities than I was previously able to manage. I am also confident that the traditional training in their medical courses means that these doctors have the knowledge to use safe treatments. They have also undergone additional studies in nutrition and the environment, factors which have been relevant in my case.

Having only recently come under the guidance of integrative doctors I would be devastated if their work was restricted. My life has been very limited in travel and regular daily activities. I do not want to be a hermit in order to stay well. I want to follow the guidance of integrative medicine in order to become a fully functioning member of society.

Sent: Thursday, 11 April 2019 7:06 AM

To: medboardconsultation **Subject:** Complementary medicine

I believe strongly that a natural therapy doctor saved my daughters life. It would be taking a backward step to cut these services. Because of my daughters success, I decided to seek help for my own health problem and they diagnosed and treated me successfully, I am now enjoying good health and increased energy and wish I had found them years earlier. Yours sincerely,

Monday, 11 March 2019 1:48 PM

Sent: To:

medboardconsultation

Subject:

Consultation on Complementary & unconventional medicine and emerging treatments

Attachments:

Campaign to support holistic therapy.docx

Please find attached my submission in support of natural therapies or "complementary medicine" as it is also known.

Love & Connection



Thoughts become things..... Choose the good ones. Mike Dooley TUT.Com



Consultation on Complimentary and unconventional medicine and emerging treatment

Where to start. This topic makes my blood boil.

Please listen to the changing views of the people, their health & well being are a big deal & the conventional medical system has had it's run & time on the podium. Only in the past 100 or so years have doctors been revered to a point where people have become numbed out by observing & being responsible for their own body & health, instead we rely on medication & doctors who continue to promote & support the treating of individual symptoms masking symptoms with poison drugs that have enormous side effects that kill thousands of people daily.

My belief is that we are evolving into a state of higher consciousness & we are no longer satisfied to have medication leading to more serious symptoms & making us dependant on drugs for the "rest of our life", which supports the profits of greedy powerful drug companies.

I had a healing centre for 5.5yrs with a group of up to twelve practitioners of varying modalities and I was often faced with people who had become so sick from the "conventional medical system" they would come to us on their dying & chronic illness times having "tried" conventional medicine for years, desperate to find answered to their health issues. Often the issues were around not looking at the whole person, holistic approach. Spending at least 1hr per treatment, usually 1.5hrs on initial consultation, building a relationship with the client to have them feel safe to share & ongoingly reveal areas of their life/behaviour that could contribute to their state of wellness.

The aim of a holistic doctor & or therapist is to get the person back to a state of homeostasis & wellness. Not a state of dependence & recurring business. This is an issue of mammoth proportion & can cross many ethical & spiritual boundaries. Having the love, faith & trust in another human being to know them as a state of wellness or respect their choice to be unwell is a moral issue, not a grandiose view, that \ddot{I} am a greater being than you, because I have the power to keep you drugged to the eyeballs for the rest of your days & keep you numbed out from the symptoms so you can no longer tell if you are recovering, even if you make other changes in your life, be they dietary, exercise or emotional improvements.

I believe the development of holistic, integrative doctors is a return to the correct way of treating dis-ease and promoting wellness. These doctors have obviously studied conventional methods, then seen that medication cut, burn & poisoning patients does not fit their moral code & the reason they became doctors. The rise in such practice is the evolving of human beings into a place where they are willing to make the changes needed in their life to maintain wellness. Holistic approach gives the opportunity for the therapist to see how the integrated body can have effects on other areas & has the innate capacity to heal

I am a breast cancer survivor, I lost my sister at age 38 to the dreaded treatment of this disease, I lost my mother at age 69 to a cocktail of drugs she was on along with some lifestyle choices that fried her liver. I have many family members, who I believe were brought to an early end due to their interactions with conventional medicine. I have lost twelve family members in the last three years. I feel a strong compulsion to speak out about this issue & would be willing to discuss it further if need be.

Please realise the need to support doctors & therapists who treat the whole person, not just prescribe a drug for a single symptom & not have the chemistry degree to know the damage caused by multiple drug taking for separate symptoms. Also the toxic food we are eating is contributing to a very lucrative Sickness (sometimes called Health) System.

The very use of the word compliment	tary medicine speaks volumes.	

I remain yours Faithfully



From: Sent:

Thursday, 21 March 2019 10:31 PM

To:

medboardconsultation

Subject:

Proposed changes to exiting code of conduct 2014

I would like to voice my opposition to the proposed changes or additions to the existing code of conduct 2014. I have suffered for years from debilitating symptoms, affecting not only myself but also my ability to care for family and to perform my work to a satisfactory standard. I had been referred to specialist medical practitioners, had multitudes of blood tests, scans and spent time hospitalised, still without getting any answers from conventional doctors. I then changed doctors and starting seeing an integrated practitioner. With her guidance and further assistance from an acupuncturist specialising in chinese medicine, I have used alternative treatments to get back on the road to good health. Not only do I now work in a busy and demanding job, I care for my grandchildren, attend pilates and am feeling healthier than I have in years. My symptoms have all but subsided and those that remain are managed at a level where they don't control my life or impede my ability to do the things that I enjoy.

I understand that the MBA wishes to redefine what is safe medical practice however in my case, I would probably not be here without the assistance of these so called unconventional health care workers. My symptoms were controlling my life in such a manner that my life was unbearable. I couldn't have gone on like that if I didn't find my wonderful integrated practitioner. This was something that has affected my life for so many years and I couldn't see any improvement. I had spent thousands of dollars on main stream specialists and felt that I was on a mouse wheel, going around and around and never getting any answers. I could never have imagined, after all of those years of ill health, living a full life like I am now.

If the MBA is successful, these integrated medical practitioners will be pushed out. I should have the right to choose my own healthcare specialist and the treatment that I feel is right for me. I firmly stand against this proposal and plead with the MBA to consider our rights as Australians.

Regards

Sent: Thursday, 4 April 2019 9:10 AM

To: medboardconsultation; medboardconsultation

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

medicine and emerging treatments

Dear Sirs or Madames,

I write in regards to the above Public Consultation in reference to complementary medicine.

I was born in Sydney, Australia in 1966 and had severe asthma since a baby.

My mother did not lean on the Medical system at all during my upbringing, raising me with traditional herbal remedies from her native Estonia (she was a WWII refugee).

I had normal health till 14 years and other than the odd chest infection my mother kept me very well and healthy despite trouble with breathing occasionally.

She unfortunately died very suddenly when I was 13 from cervical cancer.

My father was not educated in the herbal remedies. Neither was I. My health took a dramatic turn for the worse from age 14 to 19 years, becoming dependent on government subscribed drugs in inhaler steroid treatments.

Whilst these inhaled steroids (at great cost to government) calmed my asthma, I observed side effects that created further ill-health. I had regular and very severe chest infections, urinary infections, kidney infections etc requiring regular antibiotics (further government cost), overnight doctor visits and hospitalisation on several occasions. Never had I had such ill health.

Remember - prior to age 14 I was never hospitalised or needed to lean on the government for steroid inhalers, antibiotics and stays in the hospital. I used natural remedies paid for by my parents. I had relatively good health until these all stopped at age 14 after my mother's death and I moved over to conventional medicine where my health started to decline but kept me alive.

At age 19 - my ill health continued to further decline by getting Type 1 diabetes. Another financial drain on our government.

YET! I HAD FOLLOWED MAINSTREAM MEDICAL DOCTOR ADVICE RELIGIOUSLY SINCE AGE 14! Getting sicker and sicker overall and leaning on government more and more for my health care,

costing the government more and more money. Prior to age 14 - I had followed my mothers organic diet and herbal supplementation and did not lean on government at all.

Age 36? Years of trouble with health. But at 36 I got severely ill and was hospitalised for 4 weeks near death with suspected Appendicitus but was too swollen to be able to operate. (I was in UK by this time). I realised that following 100% conventional medicine was getting me sicker and sicker and I needed to change because I did not want to die.

At age 36, I decided to take my health back into my own hands, similar to how my mother had raised me. But now I was addicted to steroid inhalers and steroid tablets and Type I Diabetic, needing to inject insulin 4 times a day.

From age 36, I followed integrative health advice from different forms of health utilising herbs, nutrition, tailor made vitamin supplements, etc. I still used mainstream medicine but complimented it at my own personal expense with tailor made herbs and supplements from complimentary medical doctors both in UK and back here in Australia and in USA when I was working there.

As a result of returning to complimentary medicine and main stream medicine, my health improved VASTLY from age 36 to 49 and my ability to be valuable to society once again blossomed. I became a very powerful business consultant and assisted over 385 companies who were close to closure or very dire circumstances to now becoming profitable and valuable businesses/companies to our society. The value of my fuller health by using integrative and complimentary medicine from age 36 to 49 was returned to the government in profound and powerful ways, saving companies from bankruptcy, paying off their tax bills, keeping thousands of staff employed, etc.

That is the power of 1 persons health being returned thanks to complimentary medicine AND conventional medicine working side by side.

At age 49, I leaned away from complimentary medicine and followed the conventional medical path because I was overconfident in my health but semi-reluctantly agreed to colonoscopies and my appendix removal. Encouraged by conventional medical doctors. I quietly thought money was more their motivation than my health but didn't listen to my own inner voice...... unfortunately.

At 49 - I reverted to mainstream medicine and had my Appendix removed, even though I was relatively healthy previously and working full time. I was told I would need 6 weeks till I could return to work. I thought it a good way to take a holiday. :-)

Six weeks after my Appendix removal and all the CT Scans and Xrays and other tests that were needed at GREAT COST to our government) I BECAME SOOOOO SICK THAT MY ENTIRE BODY AND EVERY ORGAN WITHIN IT WAS SWOLLEN. My brain was swollen (I could barely think), my gut was swollen, (I

could barely eat), my liver, kidneys, were swollen (felt deathly ill) AND I COULD BARELY WALK...... not for 6 weeks as I was warned, but rather for agonising, heartbreaking years. Yes years. Soooo unwell. Soooo ill. For years.

Conventional medicine said "don't know what's wrong! Go back to GP. Nothing to do with the appendix operation".

But yet??? I happily and healthily RAN to catch the bus to go to the appendix operation at 49 and was in full time employment and since the day of that operation, I have been barely able to walk, think, talk or eat. That was 3.5 years ago.

This was the second time in my life I had followed mainstream medicine 100% and ended up nearly dead. Once at 36 and now again at 49.

I had to close my booming business of 14 staff assisting the 385 companies.

And I have been struggling to stay alive ever since that operation 3 and a half years ago.

UNTIL! I returned to what has always previously worked for me.

Complimentary medicine.

I consulted 3 different integrative/complimentary medical doctors these last few years. They worked closely with me. Any herbal or nutritional compound they prescribed was rapidly checked as to its benefit or lack of benefit, within days thus no money was wasted. Tailor suited to support my recovery to health. You can't but this tailored guidance from a drug company. It can only be done by medical doctors who truly care and have a gift in working with and healing the patient back to full health.

Month by month, these complimentary medical doctors have helped me rebuild my body from 2 years of being a complete swollen and very painful near-death mess, created by applying 100% conventional medicine and listening to mainstream medical advice to have colonoscopies and appendix removal (heavy drugs from anaesthesia and great cost to government). My body could not deal with the onslaught of drugs from these operations and CT scans and tests, etc.

Instead - Since that appendix removal operation at age 49, I have been carefully nourished and balanced back to near full health by integrative doctors at minimal expense to government and I will be returning to employment in the next two months, becoming once again a valuable and contributing member to society in assisting businesses and commercial ventures to operate with profit, efficiency and good morale which is my personal skill.

As is a good healer/ doctor professional in their skill. They only survive as complimentary doctors if they get results.

As is you - the person reading this email - good at governing our country to be supportive of all Australians in living healthily as they so choose.

It is my opinion from nearly 53 years of experience that these integrative doctors are the LEADERS in obtaining a healthy society. Commercial and mainstream medicine contains en-mass health advice which is hit and miss to specific individuals. Conventional medicine IS important but so is Integrative and Complimentary medicine if we truly wish to have a healthy, happy, contributing society in this beautiful country called Australia.

Please do not restrict or attempt to shackle complimentary medical doctors. They are brave hero's from my years of experience and should be supported, not 'controlled' through regulation.

Every industry will have their cowboys. Locate those few and sort them out rather than 'control' or 'shackle' the brave majority who are looking and learning with their patients to HEAL them.

Thank you for hearing my words.

I am happy to speak publicly if you need me.



From: Sent:

Wednesday, 15 May 2019 12:31 AM

To: Subject:

medboardconsultation
To whom it may concern

I am writing to you as I want to inform you about the improvement to my health after consulting a natural Health Dr regarding my health. I was unable to get any help or tests done by my local GP or Dr even though I consulted with him 3-4 times complaining of fatigue brain fog muscle soreness and breathlessness. I was very unwell even though I am a 29 year old female, I was for 18 mnths very sick ate a good diet and exercised daily as much as possible when I could though most of my days I would have to lay in bed. I used my asthma puffer though it did not work and I would often have panic attacks. My dr did not test me or do any blood tests. I felt desperate depressed and very alone. A friend told me about a natural medicine dr who immediately tested my thyroid and iron levels.

These came back very low and I was immediately put on a thyroid tablet plus told to take a quality Iron supplement. This has improved my life immensely and I am now able to function and go to work once again. I am so thankful that I was able to get help for my illness which was missed by my Dr and another GP as she also put me on a nutritional diet which also improved my health Thank You

Sent: Saturday, 22 June 2019 5:25 PM

To: medboardconsultation

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

Submission to: 'Consultation on complementary and unconventional medicine and emerging treatments'

by , , Victoria Email:

I am sure there is a need for processes to regulate and deal with ANY medical practitioners who display unprofessional or unethical behaviour towards a patient. However, nothing in your 'Public Consultation Paper' convinces me that new regulations should be targeted particularly towards doctors who use naturopathy or other treatments categorized as 'complementary or alternative'. From my reading of the paper I believe that there are doctors who don't do anything 'complementary' or 'naturopathic', yet who display the kinds of poor conduct the Paper highlights. What needs to be tackled is enethical or unprofessional behaviour, and not whether or not a doctor uses some naturopathic treatment method from time to time, or even frequently.

GENERAL COMMENTS

* I am 65 years of age. Across my life I have co	onsulted GPs and s	pecialists in the many	places I have lived:
	and now	I.	

- * I do have an interest in the more "natural / lifestyle" approaches to healing. As a result I have probably consulted about 50:50 with standard, conventional GPs and those with a reputation for using 'naturopathic / complementary' methods. In both categories I have had very good experiences and some less so.
- * The greatest proportion of satisfactory experiences has been with 'naturopathic / complementary' doctors (though I don't doubt that some fall into substandard modes of practice).
- * Why I have liked most of the 'naturopathic / complementary' type doctors (1) they have taken thorough histories and really listened (2) they have advised me more thoroughly on the relation between my daily living habits and my health problem than standard GPs have ever done (3) they have listened to me and worked with my preference for how we go about restoring my health.
- * Even when one of these doctors had been severely harassed by the Medical Board or Medicare (my words for what the doctor described when I pressed him on it) he continued to give me a long appointment since my questions and concerns required it. The "harassment" of the GP was for doing too many long appointments.

 NOTE: I am astonished and appalled that someone in the medical establishment / bureaucracy has decided that the 4 8 minute appointment is the best way to go for most patients and that any marked deviation from that is a smoking gun for a "rogue doctor".

COMMENTS ON A FEW ISSUES IN THE CONSULTATION PAPER

- * In discussing doctors using "naturopathic / complementary" treatments the Paper notes there is ". .risk of harm associated with some treatments (unnecessary exposure to serious side effects)". My jaw dropped very far upon reading that. As you will undoubtedly know there is a very great risk of harm associated with many of the standard treatments routinely given by GPs for many illnesses. In my experience there is a great deal less "risk of harm" from any of the treatments that "complementary" GPs have ever given me. That includes vitamins and minerals (prescribed appropriately) and herbal type medications (not produced by one of the major drug houses).
- * ".. known risks not fully disclosed potential lack of benefit not communicated clearly"

 I HAVE experienced this with a very conventional type of GP. I have NOT experienced it with any of the "complementary" GPs (not saying it couldn't happen, but I suggest you try to target it with the non-"complementary" doctors before trying to specifically target them).

* "treatment outside accepted treatment protocol/therapeutic guidelines, e.g. long-term antibiotics in the absence of an identified infection".

This is a very strange one. I suppose you have something in mind. However, for myself and most people who attend a "complementary" GP we want to avoid using antibiotics. We want another way that doesn't contribute to the development of resistant pathogens. I had a period when around 35–40 years old when I seemed to be prone to getting severe bronchitis (and possibly pneumonia) every winter. Really severe. The first winter a GP treated me with antibiotics. My recovery from the acute symptoms was slow and my recovery of energy and anything like good health was very slow—many months. Plus my gut was rather upset. The next year I found a GP who would give me intravenous, high dose Vitamin C (rather rare I think). It worked like a charm. A treatment on a Wednesday followed by another on Friday and by the weekend I was pretty well. Energy and feeling well returned rapidly. After that I found myself wishing that all GP clinics would offer that service. Of course it takes a doctor a bit longer than an ordinary six minute appointment. I had a few more such experiences over the next few years. Then I seemed to grow out of having respiratory infections. Please DO NOT persecute doctors who provide that valuable treatment service. Please make it easier and more acceptable for them to do so.

* Elsewhere in the Paper you write of evidence-based treatments and of "complementary" GPs giving treatments that are not evidence-based.

I would remind you of something you must surely know, that a great many standard, routine treatments given by the most conventional GPs have a poor evidence-base to support them.

More important than that, we need to remember that the 'hierachy of evidence' does include clinical experience. It does include doctors compiling a collection of case histories. It does include colleagues meeting together to compare their use of particular treatments. It is not so many decades ago that this was a main source of evidence and clinicians were encouraged to write these results up in medical journals. While this evidence may not be at the top of the hierachy—not an RCT—it is still included in the hierachy. Do you seriously imagine that the several doctors who treated my severe respiratory infections with intravenous vitamin C had not (a) read clinical reports of other practitioners using the treatment, and (b) discussed and compared their cases with colleagues who have also conducted such treatments?

"Evidence" accumulates in that way. Sure, some controls and some randomising would add to the strength of the evidence. But who is going to initiate and fund that trial in the current environment of suspicion of doctors who use those treatments? My impression of your paper is that it stirs up suspicion. in the absence, to date, of RCTs for Intravenous Vitamin C for severe respiratory infection, I submit, as a concerned member of the public that the limited clinical evidence available should be respected. Rather than wanting to regulate or 'attack' such doctors I submit that you should display a clinical and scientific curiosity toward their experiences. With an open mind you should ask them about the clinical experiences of themselves and their consultations with colleagues, that led to their using such treatments regularly.

A similar argument to the above section would apply to many of the treatments that the Paper appears to categorise as "naturopathic / complementary / alternative".

Yes, please investigate and regulate doctors for whom there are complaints and evidence that they act recklessly and in ways that do not respect the wishes of their patients. But I submit that these doctors will be found equally among all categories of GPs or other doctors and not especially among those who are using so-called "complementary" treatments.

Please do not instigate something akin to a 'witchhunt' to limit or eliminate my access to a doctor who is expert in the kinds of 'natural', nutritional, or lifestyle medical approaches that are important to me. I do have chronic illness. Standard GPs working in the standard, conventional way have not helped me much. Those who have helped me the most are ones who could be labelled as "complementary".

- THE END -

PS. I would be happy to take part in any live consultation, focus group or the like. Please contact me if you would like me to explain my submission more clearly.

From: Sent:

Sunday, 30 June 2019 5:56 PM

To:

medboardconsultation

Subject:

Consultation on complementary and unconventional medicine and emerging treatments

Consultation on complementary and unconventional medicine and emerging treatments

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

I have chosen to see Integrative Medicine doctors because: Conventional medicine provided no answers about why I was sick and I needed medical care with a wider range of diagnostic and treatment options. Like 250,000 other Australians, I suffer from Myalgic Encephalomyelitis (ME). GPs and specialists usually don't know how to diagnose ME according to the internationally accepted criteria and objective testing. ME was defined as a Neurological disease by the WHO in 1969 but no specialisation has ever claimed ME as their own. Therefore it takes an average of 7 years to obtain a diagnosis. IM doctors usually have a better understanding of ME. The earlier the diagnosis, the better the outcomes for the patient. I gained illness management & treatment strategies from an IM practitioner many years ago. It was very important that my life-destroying illness was taken seriously and that I felt listened to. Many patients flounder with disbelieving doctors who (mistakenly) tell them that their devastating and confounding illness is psychological. This ignorant attitude has led to disbelief & lack of support from families and communities. This is turn contributes to a suicide rate that 7x the average according to overseas research.

I have been harmed by conventional medical treatment, and needed to find other options. Doctors are still recommending outdated treatments based on a flawed UK study. The RACGP 2002 guidelines need to be replaced. The NHMRC will soon release their ME/CFS report which is likely to recommend that the guidelines be updated to reflect the recent scientific findings of a physiological basis for ME. IM practitioners are ahead of other doctors in their understanding of ME. My daughter also suffers from ME. She attended a GP who told her that ME does not exist and recommended anti-depressant medication. Ofcourse she never took the antidepressants because she wasn't depressed. She knows that she has a neuro-immune disease. She has received treatment since she was sick for 6 weeks and is now moderately ill and able to attend university part time. Other adolescents who receive the conventional treatments receive poor advice and remain much sicker.

I am happy with my GP for simple treatments within brief consultations, but I need to go further into 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.

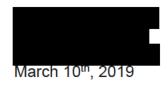
My Integrative Medicine doctor provides these for me in a way that 10 minute consultations with doctors cannot because I have a complex health condition that is not understood by other doctors.

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.

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.





To whom it may concern,

I am writing to you with my concerns about the possible changes to stop practitioners from practising integrative medicine and emerging treatments. My reasons are many, however, my main concern is a very close friend of mine who has been incredibly unwell for several years and she was unable to get any form of diagnosis or solution from many medical professionals, until she found a doctor who used complementary and unconventional medicine and treatments.

My friend, and many others in similar situations, is still battling this ongoing health issue, however, she has been able to gain some ground with her health thanks to this medical professional and his methods. It will continue to be a very long process for her road to recovery, and for this reason, I strongly believe these integrative treatments should be allowed to coincide and complement traditional medical practices.

In summing up, I therefore wish to make a submission to The Medical Board of Australia to consider the many Australians who suffer debilitating illnesses and benefit from the complementary treatments doctors and specialists are using, and give approval for this form of treatment to continue in order to improve the outcomes and quality of life for these people.

Yours sincerely,

Sent: Wednesday, 10 April 2019 9:36 AM

To: medboardconsultation

Subject: Consultation on complementary and unconventional medicine and emerging treatments

Subject: Re: Consultation on complementary and unconventional medicine and emerging treatments

Dear Medical Board,

It is with great concern that (some of) you as scientists would consider trying to restrain doctors from practicing medicine in a broad spectrum.

Speaking from personal experience if it wasn't for my doctor who could think outside a small square box that myself and my son would still be gravely ill.

Regular doctors that couldn't think outside their box couldn't help. They just kept telling us there was nothing wrong. Test after test. But you know you don't feel the same as you did, the energy is gone, your body feels like it's shutting down and the educated doctors don't know what to do or say.

Except maybe give you antibiotics for an infection you don't have. The understanding integrative medicine gives to the patients who choose to treat their bodies with kindness and heal themselves so their bodies can become stronger not just be given a bandaid to mask the underlying issue.

It should be pretty obvious that if patients didn't want to go see them then they wouldn't have a practice to practice in.

The medical board should by this day in age have the intelligence to realize that the natural healthy way is best with appropriate guidance from an educated person who in the end not only helps you but points you in the right direction. How many people out there are trying to fix themselves with vitamins and supplements every day. It's a multi-billion dollar industry just like the medicines that are pushed on people because doctors don't have the time or know how to properly diagnose patients.

This issue is beyond a few words that I can say.

These amazing people who have already been educated have gone to the trouble to educate themselves more so they can help people how the body needs to be helped. Because they went into this profession to HELP people.

There is a place for medicine of course but there is also a place for treating people in a more sustainable way so the body can recover and heal itself.

The medical board of Australia has to grow with this century not stay in the dark ages constantly trying to stop natural progress. I could could write about this forever.

There is no need to change anything, if anything you should be encouraging more doctors to heal patients with better methods than pill popping.

I am more than happy to answer or address this issue again if you
would like.
You don't need to change something if it's not broken.
Regards

Sent: Friday, 15 March 2019 11:12 PM

To: medboardconsultation

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

> Please, I am beside myself seeing this. After years of going to conventional doctors nobody could tell me what was wrong with my daughter. So I went to an integrative dr.. he helped her when no one else could and I have my daughter back!

_

- > I feel you are taking away peoples rights and choices going ahead with this. I actually find it really upsetting and disgusting.
- > All you will end up doing is forcing more people to go to naturopaths if they can go to an integrative dr!?? People go to these doctors because they've already been failed by a system that does not work for them.
- > I beg of you please don't take away our right to see a dr that we feel comfortable with!

>

1

Sent: Friday, 12 April 2019 10:40 AM

To: Subject: medboardconsultation Complimentary medicine

Attachments:

To whom it may concern,

Not supporting "unconventional medicine" is an absolute joke and doing a disservice to Australian people everywhere. If it weren't for my own gut feelings of not wanting to bandaid my children's symptoms with what "conventional doctors" were telling me to do, they would both be asthmatic and would of spent time in hospitals needing oxygen support, which a change in diet and a couple of critical supplements have changed our lives. Some examples where medical practitioners have failed myself and my family are as follows.

- I was put on antibiotics for years for constant sinus infections, stilnox at 16 for insomnia when giving up dairy eliminated these, so well as gluten ridding me of cystic acne, tinnitus, bowels issues, light sensitivity and much more.
- I was told I had pcos and to change pills and would be hard to get pregnant, I put of the pill for two cycles because it didnt feel right, healthy pregnancy within 3 months.
- -Multiple early miscarriages and a missed miscarriage to be told by specialist I ovulate late so will be hard and to be positive. (I kept saying my hormones weren't right) one natural supplement Angus vitex, which has been used for thousands of years, regulated my hormones within 4 months to successfully fall pregnant again.
- since the birth of my 2nd child I had seen a Gynaecologist, pelvic floor physio and urany incontinence specialists costing myself AND the health system thousands of dollars, and be told subsidized botox injections in my bladder would help, for me to recently see a well trained chiropractor who straight away said was an unstable coccyx and adjusting it in 20 seconds for a few weeks has made such an improvement.
- my eldest was failed multiple times with the bandaid of medicines when a natural approach has seen massive improvements in his health and behaviour. Which surprises me the medical board of Australia has not made these links in the increase of child health issues and the well documented link between western diet and these problems.
- my youngest took me 6 months of constant trips to health nurses and doctors for someone more "unconventional" to refer to the hospital dietician who finally solved the mystery being food allergies.
- the total disregard for WHO guidlines on breastfeeding by so many Australian doctors is another alarming issue. My partners eczema is another example of natural therapy ideas of diet have helped, where hundreds of dollars at specialists and creams had failed.
- It is also well documented that our indigenous people are much more susceptible to food allergies caused by western diet. Yet the majority suffering respiratory issues are pumped full of cows milk and medicines?
- the amount of additives known to cause health problems are readily available in the most food available to most people. With NO HEALTH WARNINGS.

And no education on this to the general public. Example attached. These things may be considered safe in small doses but they are in everything.

The health system is failing us and while I dont discredit the life saving advances medicine has made, I like most concerned parents do feel like better access to natural therapies should be a first point of call to help people maintain they're health, and the medical treatments should be the next point of call for more serious issues. Why is the concept of treating the cause and not fixing the symptoms so absurd? Modern medicine evolved from natural therapies so to discredit them is baffling.

If the changes you want to make are implemented you will be pushing the people even further away from modern medicine.



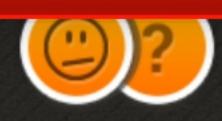
Chemical Maze







(202/E202)



Mainly petroleum derived, potassium salt of sorbic acid

CAS 590-00-1



DERIVED FROM



Petroleum

FUNCTIONS

Preservative

POTENTIAL EFFECTS

Headache, Skin irritation, Stomach upset, Hyperactivity, Allergic reactions, FIN recommends to avoid, Asthma, Allergic rhinitis (hay fever), Prohibited in foods for infants

SYMPTOMS



Allergic and hyper-sensitive reactions



Asthma



Behavioural problems



Skin ailments (eczema, dermatitis, itching, hives, rash etc.)

POSSIBLE USES

Food

Sunday, 24 March 2019 9:23 PM

Sent: To:

medboardconsultation

Subject:

Integrative medicine, the best

Hi my name is I'm 56 and for most of my life I have been sick with chronic illnesses, I have had cancer twice with a stem cell transplant which left me sick and unable to get my life back to this day,

I want to point out I have been treated by western medicine for most of my life, and went from Dr to Dr trying desperately to get help with no effect.

Western Drs neglected me and misdiagnosed me, I had chronic diahorea for years and which almost killed me,

I had a hysterectomy which wasn't necessary, because my pain was from the cancer and not nothing to do with having a hysterectomy

They misdiagnosed my cancer, totally pathetic.

I was so desperate to get help that I looked to find other alternatives, i found integrative medicine and can truly say for once I my life I felt there is hope,

I was listened to, I was taken seriously,

I got the help I have been looking for all my life, my diahorea stopped, my gut issues were finally recognized among other issues

I could go on and on and I can't speak highly enough of the integrative Medicine and the practitioners who helped me,

I would never ever go back to western medicine again, those Drs don't take their patients seriously, you are just another number, 5 mins and they throw u out,

I am alive today because of the integrative Medicine and the Dr who took his time to do all he can to help me, I shall be forever grateful to him.

Thank you

Sent: Wednesday, 3 April 2019 6:50 PM

To: medboardconsultation

Subject: Consultation on complementary and unconventional medicine and emerging treatments

To whom it many concern,

I would like to raise a serious concern regarding the public consultation paper proposing "clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments" that appeared on your website on the 30th March.

The discussion surrounding imposing a new set of guidelines for doctors who use safe Integrative Medicine in their practice would irreparably cause damage to our healthcare system.

With more than 30% of Australians choosing integrative medicine, and hundreds of thousands people being helped by this approach daily, it's incomprehensible as to why this topic is being raised.

Conventional medicine has its place in the world however the side effects and harm it causes is well documented.

My sister has MS and was prescribed Avonex, which made her very unwell and caused her Graves' disease and many flare ups.

Her MS has been managed by integrative medicine now for the last 10 year with no flare up and a stable condition with better overall health.

We have an excellent conventional doctor that utilizes integrative medicine into his practice and provides an outstanding level of care.

I share the concerns that the AIMA has and sincerely hope that the information presented to you is looked at in a non biased and analytical fashion.

The main concerns about the proposed regulations were that the Board had:

- Creates unnecessary guidelines, as the current Code of Practice already addresses all safety and efficacy issues related to Integrative Medicine. This was a waste of taxpayer money;
- Breaches its own COAG Principles in creating the document, including restriction of consumer choice of their own doctor outside "conventional" medical practice;
- Fails to consult with the Integrative Medicine community in the planning and development of the regulations, leading to a lack of procedural fairness;
- Fails to identify any significant concerns about the safety of Integrative Medicine or any risk to the public; and
- Links Integrative Medicine, at the lowest end of risk to patients, with high risk experimental interventions in a single flawed group definition.

My family and myself are strongly selecting and in favor of *Option one*.

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

I sincerely hope that my email is read and considered.

Regards,



From:
Sent: Thursday, 11 April 2019 5:05 PM
To: medboardconsultation

Subject: Regulation of Medical Practitioners

Hello, my name is and I suffer with hypothyroidism. After years on Oroxine, I developed unexplained leg weakness which the doctors were unable to diagnose. Even visits to multiple neurologists confirmed weakness but no cause. I lead a healthy lifestyle, going to the gym daily and eating a healthy diet. I am on no other medications. When I checked some hypothyroid online forums, many people on Oroxine had similar problems. I was then prescribed natural thyroid extract and my leg weakness and pains have subsided. It worries me that finding a solution to Oroxine alternatives is now under scrutiny, probably heavily influenced by pharmaceutical companies who want the monopoly on creating health issues and then creating drugs to heal those issues. I feel my health will deteriorate if I have to return to Oroxine and I might have to go overseas to get this medication or have it shipped in. I hereby request that thyroid extract be continued to be supported by integrative practitioners. Working in a public hospital myself, I have seen how health can deteriorate with not being on the right medications and I fear the same for myself. Thank you,

Sent: Wednesday, 1 May 2019 8:55 PM

To: medboardconsultation

Subject: Fwd: Submission to support Option 1:

Submission to support Option 1 on Draft paper: Consultation on complementary and unconventional medicine and emerging treatments.

Integrative medicine was not our first choice of treatment for our daughter. For two and a half years we were assessed and treated by our GP, Paediatrician and finally two respected Paediatric Gastroenterologists. We also sought the expertise of a Child Psychologist, Paediatric Dietician and a Paediatric Occupational Therapist. My daughter's symptoms included constipation with alternating faecal incontinence, reflux, abdominal pain and physical sensitivities on her feet and head. She appeared to have sensitivities to foods containing sugar and wheat which would increase her symptoms.

She also displayed concerning behaviours at home such as regular aggressive physical and verbal outbursts, persistent stubborness, moodiness and an inability to play independently.

Her preschool was the first to raise concerns regarding her inability to focus in their pre-literacy classes. Then we became more concerned when her kindergarten teacher also raised concerns about our daughter being unable to focus in class or on tasks.

Our daughter had great difficulty learning to read and was placed in a learning support group. Apart from the symptoms listed above our daughter had met all of her milestones. She started speaking at age 6 months and walking by 13 months. She had been seen regularly by our Paediatrician since she was born and there were no overt concerns regarding her development.

There is no doubt that her Paediatric Gastroenterologists assisted in alleviating some of the gastrointestinal symptoms through conventional medicine (Osmolax and Somac). However, their prognosis of her condition was that she would probably need to use this medication until at least adolescence. There was no formal testing of her stool, blood or urine. An X-ray revealed that she had about 5 days worth of faeces in her bowel. This was certainly reduced by her prescribed medication and the family's decision to try 'low sugar and no wheat'.

Her behaviour issues did not alter however. We were greatly concerned about her inability to focus at school and her aggressive and difficult behaviour at home. A Child Psychologist visited our daughter at home and at school and provided us with behaviour modification strategies. The strategies were useless for our daughter. A friend suggested that I contact an Integrative Medical doctor for further assessment.

Our integrative doctor was extremely thorough with testing and did not prescribe any medications or supplements until he received all of the test results. Within 6 weeks of the treatment plan my daughter no longer required Osmolax or Somac. The school reported that her focus at school had improved significantly. At home her mood became happier, she argued less and contently played independently for the first time.

My husband was the biggest sceptic about how these treatments could possibly work but as the months rolled on, he too could not deny the impact that the Integrative Doctor's treatment had on our daughter. Within three months of treatment the school reported that our daughter was a "keen learner". Our close circle of friends and family were amazed by the change in her behaviour.

When I learned that there could be significant change to the regulations regarding Integrative Medical practise I was deeply concerned. I understand that as doctors you have an essential duty of care to your patients. I want nothing less for my children.

I am concerned however that if these changes are forged that my daughter and others will be unable to access their appropriate treatment and medications. Without her current medications and supplements she will return to her previous mental and physical state. She will become a greater burden to the health system and society. Please do not take away the only chance she has at leading a satisfactory life and being a useful member of the community.

I support option 1 to leave the current regulation as it is.

Sent: Sunday, 30 June 2019 10:22 PM

To: medboardconsultation **Cc:**

Subject: public submission

Regarding the public consultation on clearer regulations of medical practitioners who provide complementary and unconventional medicine and

emerging treatments. As an Australian citizen I feel it's important

that I have the freedom of choice in the type of medical care that I use

to address my chronic health issues. I have been suffering from

several chronic disabling back injuries ,ross river virus, tick born

illness (Lyme disease) and coinfections, MSIDS ,CFS ,gut issues.

Conventional medical doctors have not been able to successfully treat my

conditions and bring me to a satisfactory level of health.

Pharmaceuticals and the use of conventional methods simply did not work and in some instances also delivered unwanted side effects and seemed to

waste Medicare funds and resources. It was only when I saw an

integrative medical doctor and a naturopathy who included lifestyle changes, diet and supplements of vitamins and minerals, also herbal

medicines to address my problems that my condition began to improve.

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

and daily activities. yours sincerely

30/6/2019

Your Name :	
Your email :	

Consultation on contemporary and unconventional medicine and emerging treatments

Your message: As a long-term sufferer of Chronic Fatigue Syndrome and also with 2 children with Autism, it is vitally important that doctors and other allied/complimentary practitioners retain the ability to recommend supplements, therapies and treatments that are outside the box of mainstream medicine, particularly when it comes to complementary therapies and herbal based supplements.

As a family we have had no success in treating either disability with pharmaceutical medications, the benefits we receive as individuals all come from allied and complementary therapies and supplements as recommended by GP's, naturopaths, kinesiologists, bio resonance therapies. This choice of practitioners to recommend outside the narrow guidelines that are being suggested, needs to continue as a restricted approach will not help our family, instead it will hinder our wellbeing, which includes personal and economic wellbeing.

I support option 1

From: Sent:

Thursday, 11 April 2019 1:51 PM

To:

medboardconsultation

Subject:

Fw: Consultation on Clearer Regulation of Medical Practioners Providing Complementary

medicine and Emerging Treatments

Dear Medical Board

I write to you regarding the public consultation on clearer regulation of medical practioners who provide complementary and unconventional medicine and emerging treatments.

I have been suffering from numerous Chronic conditions for over 25 years. Initially I started by consulting mainstream doctors, however my condition worsened over time and I was literally given a short time to live. I turned to an Integrative doctor who was able to prescribe me medicine as well as complementary medicine when I either couldn't tolerate the pharmaceutical drug or the vitamin/mineral/herb had the desired effect. My health has improved considerably and it has been 12 years since i was given my 'count my days' time. I've also benefited from compounded medications when I've reacted to the main generic medication.

Living in Australia, in a democratic society, I believe it is my right to choose to see an integrative doctor and to choose complementary medicine. My life experience has shown that complementary medicine has turned my health around and I would not be here without it. I would not be able to work as I am able to now, and that would just put more of a burden on the already overloaded welfare system.

Complementary medicine has been crucial to my recovery and I trust you will ensure it continues to be able to be prescribed by both Mainstream and Integrative Doctors

Sincerely in Health

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

By: member of the public -

I do urge you to retain Option 1 because I have had to rely on the assistance of integrative GPs to assist me with my chronic health issues and this has enabled me to survive financially and mentally for the past 30 yrs.

Complex chronic health issues

I suffer from a number of complex chronic health conditions: CFS (post glandular fever) & hypothyroidism, reactive hypoglycaemia, adrenal insufficiency – 33 yrs; Lyme-like illness (5 yrs); ...

I am not a GP hater, but conventional GPs have never offered any suggestions or help at any stage (beyond test & prescribe thyroxine) and on occasions have been negligent in their lack of testing/advise/ knowledge. One even told me that because I had had glandular fever that I would, "Never be any good" and did not do any testing to determine if other issues were causing my extreme fatigue. A visit to another GP subsequently revealed I had hypothyroidism.

The 'cleaners' should be put through the conventional GP world that you are supporting before you attack integrative GPs. I know so many horror stories of harm being done by those who have been responsible for the health of my family and friends.

Only by being treated by integrative GPs many years ago and researching the protocols of many who specialise in helping my conditions have I had thorough testing and been able to treat and learn how to assist my body to heal by improving the factors that were negatively loading my body and causing a 'crash'. Only the incurable is then left to drain my daily energy and I have been able to get back to work until the next crash.

Financial

Without the above assistance from integrative GPs in regaining my health after my frequent crashes, I would not have been able to keep myself 'afloat' financially and would have had to rely on social security for the past 30yrs.

Mental

If I had relied solely on conventional medicine, I would have committed suicide long ago because my quality of life would have been so poor.

Sent: Saturday, 20 April 2019 5:32 PM

To: medboardconsultation

Subject: Consultation on complementary and unconventional

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

To whom it may concern

I do not know who is funding the relentless and ongoing attacks against all things that are not listed in the MIMS in this country!

Septics association targeting all things non big pharma under the guise of the so called Friends of Science and Medicine, and the removal of health fund rebates for many natural therapies recently in this country (something that has forced me to let go my private health, so now I will simply use the public system), this latest attack is beyond believability. For how long are the TGA and the Medical Boards going to bend to the wishes of a sub group of people with big pharma interests and zero care factor for those of us who are not helped by the main stream approach?

Why the hell would anyone want to do all that study – 10 years or more – only to be told how they can use their brain in the treatment of their clients?

I am so sick of hearing about Evidenced Based Medicine when the industry is bought and, as a consumer, all I care about is Results Based Medicine.

I have been both a consumer of natural heath products, a practitioner of naturopathy, and had the great privilege of working in an integrative medical health practice for over 10 years. I can tell you now the best results I've ever seen in 25 years of working as a natural health practitioner and 40 years as a consumer with a chronic long term illness, of which there is no standard medical treatment, in both myself and 1000's of clients came from combining mainstream with complementary practices.

I beseech you to not let this be controlled by even more regulation. These doctors make less money, are more often than not not using the Medicare system, do longer consultations in order to get the whole patients history, work like health detectives to improve the quality of life for their patients, research, research and research some more, do not get paid the same rates as specialists and yet work with complex multi system disorders that fall under the banner of no specific speciality. They are already doing a hard and magnificent job. Do not lessen this for their patients by interfering in this process

other than to do what you already do if you receive a complaint about a treating doctor. Let them use their fine minds.

Also, the idea that compounded prescriptions should be stopped is nothing short of absolute ludicrous stupidity. Let me outline myself as an example for you:

I have a mast cell activation disorder, ME/CFS with Fibromyalgia and multiple chemical sensitivities and hypothyroidism, and I don't tolerate many drugs. I am allergic to many many things including gluten, lactose, casein, brilliant blue colouring to name but a few. As such I need the following drugs compounded: Melatonin, Ketotifen 1mg, Armour Thyroid 2.5 grain, HRT Cream Bio-Identical (I could never take the pill my whole life and I can't use synthetic HRT either but I can tolerate these creams) and I have to have clonazepam ampoule but take it orally as there is no lactose free benzo tablets in Australia. As you can see I have to rely on compounded medications. If I could not access these my quality of life would be such that I don't know if I would bother. The state I would be in without these supports would take away any small quality of life I currently have. As I am aging my conditions are worsening and I have had to rely more on prescriptions to support me. I take many other things — over the counter and supplements that help me but these compounded things are what helps the most. Obviously these compounds have to be prescribed by a doctor and I can't afford to see specialists, or frankly manage to get in often enough, if these prescribing rights were taken out of the gp's hands.

I have never met an integrative GP who is not using good evidence to do what he or she does so unless you are receiving ongoing complaints about a particular doctor I can't see how the system needs changing.

This one size fits all approach in both practice and prescription simply does not work for some people (like me – oh that it did) and it's foolish to think it could ever work that way. These doctors take from the public system a massive burden in that they will dedicate the time to the individual and look for the key drivers of that persons disorders as opposed to these complex patients ending up in the public system going from specialist to specialist – while none of them look at how it all fits together.

For people with complex multi system disorders this integrative approach is an essential and necessary service, that they choose to pay for, and that must remain at all costs because without them the individual patients are far worse for it, and society as a whole ends up paying for it if these patients slip through the cracks and can no longer be an active part of society.

You should be celebrating and supporting the doctors who do this essential work. Regards

From: Sent:

Monday, 1 July 2019 6:30 AM

To:

medboardconsultation

Subject:

To whom it may concern

My name is

I'm 45 yrs old and live on the central coast NSW

In October 2011 I was diagnosed with bowel cancer. This came as a surprise as I was 37 yrs old and considered myself a healthy adult. in the past If any health issue did arise I approached them with eyes open and looked at many ways to treat myself.

This was the same when I was diagnosed with bowel cancer in 2011. At the time conventional doctors were only interested in treating me with chemotherapy and radiation therapy which didn't feel right with me as i was interested in treating the cause not the symptoms.

i was introduced to an integrative GP who helped me look at many therapy options to help support my body and at the same time cure my issue. I'm very happy to say today, 8 years from diagnoses, I am cancer free, This was with out any chemotherapy and radiation therapy.

I support freedom of choice for patients to access Integrative and complementary Medicine. I am concerned about the Medical Board of Austrlia's proposal to interfere with this choice.



10 April 2019

Dear Sir or Madam

I write to you to express my alarm at the attempt to restrict medical treatments that are outside of main stream health care parameters.

I am a 75 year old caucasian male who has had a decline in my health and mobility since a knee replacement five and half years ago.

There is constant pain in this knee since the operation, even though the surgeon said that it is impossible to have pain. After numerous falls and two hospital admission via an ambulance. From then on my gait is staggering and unpredictable. I have had special shoes made to every little effect. It was suggested by a GP that I seek advise from a neurologist, the first neurologist, after several visits and over \$1000 in fees said that I should except it and try a walking stick.

Visits to a second neurologist lead to the outcome that he suggested; that was to drain spinal fluid from my back to see if this would help, if it didn't he suggested that a neurology surgeon could drain fluid from my brain.

I have been using, through a holistic physiotherapist a machine that has had a marked effect on my walking as I can walk more readily and direct than I have been able in the past four years.

In parallel with this I have begun services of a holistic GP who has me using vitamins and dietary supplies to help me.

I believe that my mobility will revert to the unstable state it was in if there services are denied to me.

Yours Faithfully



From: Sent: Friday, 12 April 2019 6:59 PM To: medboardconsultation **Subject:** Medical Board Submission

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

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

I also consider it to be a basic human right as set out in the Universal Declaration of Human Rights 1948 and International Covenant of Civil and Political Rights, Article 25.

As noted in 'The Right to Health', (https://www.ohchr.org/Documents/Publications/Factsheet31.pdf.)

"The right to health is a fundamental part of our human rights and of our understanding of a life in dignity. The right to the enjoyment of the highest attainable standard of physical and mental health, to give it its full name, is not new. Internationally, it was first articulated in the 1946 Constitution of the World Health Organization (WHO), whose preamble defines health as "a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity". The preamble further states that "the enjoyment of the highest attainable standard of health is one of the fundamental rights of every human being without distinction of race, religion, political belief, economic or social condition."

I have been suffering from : digestive issues, chronic back pain, auto immune problems, fertility issues, chronic fatigue.

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

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

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

cribe for me, I nd my wellbeing.

If I cannot see an integrative doctor, or the Doctor is restricted in what he or she is able to pres
know that my health will deteriorate and have a continuing impact on my family, my work, a
Concerned,
Name:

Signature:				
Date:				
12	/_04	/_2019		

Sent: Saturday, 23 March 2019 5:12 PM

To: medboardconsultation

Subject: Constricting the use of natual therapies with general practitioners.

HI Board,

I just wanted to state that I can understand your concerns concerning having restrictions on alternative medicines used by general practitioners, but I just wanted you to know that conventional treatments were not working for me and so I want you to consider allowing the current practises to continue.

I have been sent to three neurologists concerning the constriction of my right sided face, which at times was extremely painful. Each neurologist gave me a different diagnosis but none of them would investigate to find out the cause of the facial constriction, similar to bell's palsy, but was not diagnosed as such. Every single one just wanted to treat the symptoms without finding out the cause.

At least the general practitioner that I was attending was interested in finding out the cause and treating the cause, rather than just having the neurologist administer botox every 3 months for the rest of my life. Even though the research and the treatment once established was expensive, it was much better than having to frequent doctors three monthly for a treatment that I did not need.

The alternative medicines have treated the issues extremely well and I am now the fittest I've been in years and have not had the facial issues for approximately 2 years.

The doctor I have frequented has been expensive and I can see how that this would cause issues for most sick people. At times it has caused financial issues, but I was willing for this to now have the health that I am experiencing.

May I request that you really consider what restraints you will be causing if you restrict alternative treatments. I truly hope and pray that you don't choose this idea and i would not like other people to have to go through the frequent visits to medical practitioners who only want to treat symptoms rather than getting down to what the actual cause of the issue is. With doctors who have been most effective with alternative practices, they spend time to research and treat the actual causes.

Thank you for looking into what I am suggesting as it will cause more out of pocket expenses if we cannot continue with current remedies and it would mean that I will once again fall back into not being a healthy individual if my herbal vitamins and treatment is cut out.

Yours sincerely,

Sent: Thursday, 14 March 2019 8:07 PM

To: medboardconsultation **Subject:** Complementary medicine

Hi,

I recently came across information that integrative medicine may be stopped. This concerns me as I have Hashimotos autoimmune disease. I'm on NDT, I've tried thyroxine, T4 only but I became resistant on T4. Me and thousands of others. NDT and T3 has saved our lives. Without it we will become very sick.

I hope this won't be the case

Thank you

From: Sent:

Thursday, 4 April 2019 11:21 AM

To:

medboardconsultation

Subject:

Concerns

To Whom it may concern I am writing to express concerns over the proposed new guidelines for complementary and unconventional medicine and emerging treatments.

In Australia and internationally there is a growing number of chronic illnesses for which conventional medicine has no answer no treatment and no help. Conventional medicine is letting the side down badly but rather than focus on improving this situation the focus has turned to limiting the help others can give.

As someone with long term chronic illness the only way to take a proactive approach to strengthening and optimising my system is through complementary medicine. Conventional medicine has two modalities surgery or drugs. There is no focus on optimising the body and no plan to develop such a focus. Making a big stick to chase those who are not practitioners of the current failing model is altogether the wrong focus that will cost much more economically in the long term.

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.

Regards



To the Medical Board of Australia,

After reading your public consultation paper with a proposal to provide clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments I am very concerned.

I have been a patient of a General Practitioner who prescribes alternative medication to treat low testosterone, hypothyroidism and high cholesterol successfully with alternative and conventional medications.

I am concerned that Pharmaceutical Companies may be influencing the Medical Board of Australia in your decision making on this change to regulations on behalf of all Australian citizens. General Practitioners who do not research credible independent and current research well enough are relying on information presented by Pharmaceutical Companies and they are treating the symptom and not the cause. This form of medical consultation can cause many side effects and clients are continuing taking previously prescribed medication by the same general Practitioner and this causes more side effects.

My General Practitioner is one of a group of GP's who study Australian and world medical research and at times are frustrated at some of the regulation restrictions that limit the proven treatments they have discovered for their patients. Some of the treatments are not conventional however they are proven treatments in other major countries in the wide world. The refusal by the Medical Board of Australia to recognise that Limes disease is in Australia. It is easy to say no, try proving that.

Please be certain that your proposed changes to the regulation of medical practitioners in Australia who provide excellent advice to their clients as a result of recent studies of independent research and solves the cause of their health problems are not restrained from providing effective alternative medicine treatment with no side effects.

Freedom of choice for all Australians by all Australian regulations should be allowed. We should be allowed to consult the medical practitioner of our choice regardless of whether they prescribe conventional or alternative medical advice.

Yes there are some so called medical practitioners who are not providing the best outcomes for their clients. They do need guidelines. There are some Medical practitioners who are rorting the Medicare system too. This statement is the experience of members of my country community and me.

Kind regards,



Saturday, 18 May 2019 8:05 AM

Sent: To:

medboardconsultation

Subject:

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

I have been extremely concerned to hear that the MBA is considering constraining doctors from practising integrative and complimentary medicine. I believe it is extremely important to retain the status quo of providing general guidance about the Board's expectations of medical practitioners who provide complementary and unconventional medicine and emerging treatments via the Board's approved code of conduct.

I have personally benefited greatly as a patient of an integrative doctor after suffering a knee injury. My regular specialist could offer me no treatment other than pain relief and I honestly believe that I might now be cripple, if I had not found an integrative doctor who provided other options.

The bottomline is that conventional medicine, amazing as it is, still does not have all the answers and there are many people who like myself can slip through the cracks and not get the treatment they need. I believe it is also very supportive of society in general, that some doctors can support from a complementary perspective to get to the heart of chronic illness, rather than simply providing a bandaid for symptoms, which does not encourage the recipient to take any responsibility for their health. Ultimately this offers the best chance of improving the health of all Australians and reducing the cost of healthcare which is currently out of control.

As a final point I would like to add that new treatment options must emerge from somewhere and since we do live in a democracy, to my mind the most important tenet of democracy is freedom of choice. To limit the publics access to integrative medicine seems to be not only limiting the emergence of new treatment options, but heading down the path of dictatorship and not democracy. My vote is simply to be allowed the choice.

Yours Sincerely,

12nd April 2019



AHPRA-MELBOURNE RECEIVED 1 8 APR 2019

Medical Board of Australia, GPO Box 9958, MELBOURNE, VIC 3001

Dear Board Members,

PROPOSED CHANGES RESTRICTING THE CHOICE OF TREATMENT USED BY DOCTORS

It has recently been brought to my attention that my health is in jeopardy by your intended actions to restrict medical practitioners from prescribing unconventional medications.

I had niggling health issues for some 10years – fatigue, always cold, lethargic and I sought advice from my then doctor. My blood pressure was up, cholesterol high and this was disturbing and did not line up with symptoms I was suffering. I was reluctant to start taking medication at the age I was and felt there had to be a reason why my health was poor.

Friends told to go to a Naturopath and see what they can find. I did this and I was told my Thyroid wasn't functioning correctly. I went back to the doctor and he was happy for me to try what the Naturopath had suggested — a diet of no gluten or dairy for 6 month and then retest. I was retested after 6 month and although my levels had improved significantly, they didn't improve to the satisfaction of the naturopath or my doctor, so I was put onto conventional Thyroxine medication. At this time my regular doctor retired.

My health deteriorated and the new doctor I was seeing put me onto a statin to regulate my cholesterol which was now worse that it was before and increased my dose of thyroxine. I was now suffering memory loss, high blood pressure, was lethargic and feeling quite unwell most of the time which was making work and home life difficult as I could not function. My health was worse than it had ever been, so I started to search for a doctor who knew about thyroid functions and how to treat it. I found a Doctor who was recommended through the Thyroid Association website, made contact and so my journey into a combination of conventional and unconventional medicine began. I just wanted to be able to function and was open to anything that was going to work.

My Thyroid doctor went to great lengths to identify what was going to be the best outcome for my body which is a combination of conventional and unconventional medication. My body reacted negatively to components of the traditional thyroid medication so instead of it fixing the problem, traditional thyroid medication was making it worse. I was ropable that I had been put through this by the previous doctor who simply did everything by the book but didn't investigate what the real problem was.

For the first time in about 3 years I was starting to feel well again and able to function in a very busy and stressful business. Now I am told that these options are being taken away and I will be left in the situation I was before and quite frankly, this scares me and I am absolutely flabbergasted that you would be considering taking away the choice of patients and very open mined doctors who can

see the benefits of both conventional and unconventional medicine and work very hard to get the right combinations and the best outcomes for their patients.

I understand about regulation, but I also understand how Government regulations tries to put everyone in the one box and this does not work. We are all different and how dare the board restrict the choice of Australians when it comes to their health. If these changes go through, it will cost the Government more as those, like myself are left without suitable medication and a greater strain on the health system when trying to support my failing health. Just because there isn't scientific research to back up unconventional medicines, it is very short sighted to believe that they don't have benefits – there hasn't been enough research dollars put in place to get the results where as my test results can verify that it works.

I would be very happy to discuss this with board members and I would appreciate feedback about my concerns. My phone number is a second of the concerns of the

Regards

Sent: Sunday, 30 June 2019 12:30 PM

To: medboardconsultation

Subject: Consultation on complementary and unconventional medicine and emerging treatments

To Whom It May Concern:

I choose Option 1.

I have had Doctors tell me that complementary treatments are just old wives remedies but they've worked for me and also for my children when they were growing up. All of us still use a tried and true family recipe to combat severe head colds and 'flu. After suffering a debilitating infection of a surgical abdominal wound with Staphylococcus Aureus that took five months of dressing changes and various antibiotics to treat, I would turn to more natural treatment methods now. I have used a complementary treatment purchased at a Health Food shop for Rosacea and had a huge success far outstripping the metronidazole I had been prescribed, and which was very expensive.

My current GP is open to complementary treatments in conjunction with medical and/or pharmaceutical intervention and I want to continue to be treated by a Doctor whose abilities I respect and trust to give me the best possible health outcomes. I have some health issues associated with ageing and use a combination of conventional medications and assessments, exercise, diet, meditation techniques to reduce stress and anxiety, and physiotherapy. My Doctor listens to me and doesn't just write a script or try to brush off my concerns to hurry the consultation.

I do not think new regulations are required for doctors practising in the areas of complementary medicine and integrative medicine.

I have chosen to see Integrative Medicine doctors because:

I want to be involved in my own health care and this requires time in consultations and additional medical training that I found in my integrative medicine doctor.

Conventional medicine didn't always work for me. I have been harmed by conventional medical treatment because a Doctor

years ago prescribed a treatment for a skin condition and didn't explain the side effects. This was before the Internet was available and I could look up medications to educate myself on such things. I ended up with thinning of the skin and have had to live with this under my chin for decades now as there is no way to make the skin back to how it was originally.

I prefer non-drug approaches for managing my own health or illness. 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. My integrative medicine doctor provides me the time and knowledge to do that.

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

I have concerns about the proposed regulations because:

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

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

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

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

Yours sincerely,

From: Sent:

Tuesday, 23 April 2019 1:48 PM

To: Subject: medboardconsultation Integrative Doctors

To whom it may concern

I am writing to express my concern that you are looking to limit and control what Integrative Doctors can prescribe. By doing this, you are, in my view as a patient, unreasonably controlling their practice.

I have recently started consulting (for the first time) an Integrative Doctor. She has, in the course of three consultations and as a result of careful investigation, identified and successfully treated a long standing health issue which I have suffered with for the best part of 40 years. In that time I have consulted medical practitioners and specialists too numerous to mention. None of them were able to identify my problem, which it turns out has been easy to treat once discovered. It took an Integrative Doctor to do this.

By restricting how Integrative Doctors can practice, I believe you would be unnecessarily and unreasonably limiting diversity in the range of treatments available to patients, you would be unreasonably limiting my choice of treatment as a patient, and you would be unreasonably dismissing the extra time and effort professionals have expended to gain additional accreditations in their respected field.

I request that you pursue option 1.

Kind regards,

From: Sent:

Thursday, 21 March 2019 1:44 PM

To:

medboardconsultation

Subject:

Opposition to further changes or additions to the existing Code of Conduct 2014

Attachments:

To whom it may concern,

I am writing as I am aware that the Medical Board of Australia has released a consultation paper in February that aims to redefine what is safe medical practice in Australia. The paper is responding to complaints mainly cited from emerging and unconventional medicine cases and implies such dangers apply to all complementary medicine. I believe the paper is seeking feedback from the general public.

I am writing to tell you that my experience with natural practitioners has been life changing and my family would be severely disadvantaged if you were to prevent or limit these services.

In summary I have been attending a naturopath who is also a GP for my son since he was 2.5. At that age he was displaying very serious behaviours violence towards me and other people, unable to concentrate on any game or even tv, daily blood noses, a red irritated anus, refused food till the age of 3, very delayed speech among other symptoms. Life was very difficult and he had started to be excluded from events and we had a number of family friends who refused to have us visit their house with him.

We went to see our then GP, a paediatrician, a chiropractor and nothing helped. Finally we met with an integrated GP/Naturopath and she worked with our son to see immediate results. A stool test revealed that his gut had incredibly high levels of strep, candida and parasites among other bad bacteria. We changed his diet to a gluten free, dairy free and sugar free diet and added supplements such as zinc, magnesium, vitamin c and others and his behaviour changed immediately. As his system cleared out his stools changed to be tinged by almost every colour of the rainbow - red, yellow, white, green and finally to a normal colour. My boy changed almost overnight and finally was able to drive cars on a mat, started colouring in, stopped hitting, biting and over 2 years has been almost completely healed. He still has some learning difficulties which I assume is because he missed out on some of the early building blocks needed for his brain to develop. We still see our naturopath several times a year to check in and see what further improvements can be made.

My husband and I have also seen another naturopath for our fertility. We have had to use IVF to have each of our three children and our third we had after 2 cycles of IVF however our third took three years, 8 rounds of IVF and over 900 injections. We turned to a fertility naturopath after 18 months of no success with very esteemed IVF Dr's. Once joining this fertility program we were taught about making many changes to our diet, the chemicals that we were putting on our skin, and cleaning with and started taking additional supplements and a hundred other changes which then resulted in our sperm quality and our egg quality improving significantly enough that on the 8th cycle we had three viable embryos when we had never had any in the 7 rounds prior. We now have a beautiful 6 month only baby called due to the treatment by this fertility naturopath.

We also heavily relied on an acupuncturist weekly to help me to fall pregnant as well as during pregnancy. I have seen two different acupuncturists for over 9 years now. I have seen physical changes like pain removed from my body, flu symptoms cleared or it has stopped me over thinking and using energy on thinking rather than using it in making the baby. This has been so fundamental to support me through the process.

I also have had some surprising results on my journey to pregnancy after visiting a Kinesiologist. I have seen a wonderful lady who has an incredible way of viewing me after meeting me and has provided me with invaluable advice which has really helped me to slow down and I believe this was instrumental in my journey to pregnancy.

There's honestly so much detail I could explain but its hard to put it all into words.

I have come from a very educated family. My mother is a senior high school teacher for 50 years and my father won an order of Australia medal. I have a Bachelor of business and run a successful business. I grew up going to the doctor and thinking that traditional methods used by GPs and hospitals was the only way. I only turned to Naturopaths when I was beside myself with worry about my family and my own fertility. It has saved my son from a lifetime of problems as I'm sure he would have had an ADHD diagnosis and I would have never met my third child. I believe that we need to bring these natural therapies into higher esteem valuing the contribution that they can bring. There are too many health problems out there that are being addressed with bandaid solutions rather than seeking the root cause.

In summary my family highly values natural therapies as well as hospitals and modern medicine doctors. We vehemently oppose further changes to the existing code of conduct 2014.

Please do not hesitate to contact me on	should you wish to discuss further
Regards,	



Wednesday, 6 March 2019 8:07 PM Sent: medboard consultationTo: Public consultation on integrative and unconventional medicine Subject: I wish to voice my approval for integrative medicine and want to see Dr's still be able to practice it. and without her and her treatments I would not be I see an integrative Dr, , practicing in alive today. I think it is abominable that this form of treatment is looking like they will not be able to practice it. It has saved my life. It is not without science backing it. My bloods showed huge abnormalities and now I am back within the normal ranges and feel wonderfully well. I am so thankful to her way of treatment. All other Dr's have failed to get me well Please note my objection to this stopping of this kind of treatment. Your sincerely

From:

Sent: Thursday, 4 April 2019 9:37 PM

To: medboardconsultation

Subject: Consultation on complementary & unconventional medicine

Please note that my access to health practitioners specialising in Hashimoto's & thyroid diseases may be compromised if this study is not carried out with meticulous attention to detail, particularly in discriminating between the following practices...

- 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

Yours,

Sent: Friday, 22 February 2019 3:38 PM

To: medboardconsultation

Regulation of Medical Practitioners.

To whom this may concern my name is I'm a hair and makeup artist and as an Australian citizen/resident I feel I should have the right to choose what methods I use to address my chronic health issues.

I had been suffering from asthma and underactive thyroid low iron, severe period pains, parasite infestations etc.

Conventional medical doctors have not been able to successfully treat my

condition(s) and bring me to a satisfactory outcome.

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

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

If I cannot see an integrative doctor, I feel that my health will deteriorate and

have a continuing impact on my family, my work, and my well being, also this to me is taking away individual rights and freedom to choose how my body is treated I feel that only drugs will be forced on my health this to me is not moving forward but going into the dark ages in medicine.

Concerned

Date: 22/02 / 2019

Sent: Thursday, 28 February 2019 8:50 PM

To: medboardconsultation

Subject: No to regulation of medical practioners

Regulation of Medical Practitioners.

To whom this may concern my name is I'm a mother and grandmother as an Australian citizen/resident I feel I should have the right to choose what methods I use to address my chronic health issues.

I had been suffering from a

underactive thyroid low iron, high blood pressure fibroids arthritis, parasite infestations etc.

Conventional medical doctors have not been able to successfully treat my

condition(s) and bring me to a satisfactory outcome.

Using a G.P. prescribing pharmaceuticals and the use of conventional

methods that simply did not work (and also delivering

unwanted side-effects) seems to waste far more Medicare funds and

resources.

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

If I cannot see an integrative doctor, I feel that my health will deteriorate and

have a continuing impact on my family, my work, and my well being, also this to me is taking away my individual rights to choose what happens to my body and feel only drugs then can be offered and this is like drug pushing not health care.

Concerned

28/2/19

Sent: Saturday, 20 July 2019 7:27 AM

To: medboardconsultation **Subject:** late patient submission

Good morning

I understand that you had called for submissions on complimentary, unconventional and emerging treatments. I realise the submission date passed but I was wondering if there is any way we could share our experiences and contribute to the discussion about the need for complimentary and integrative approaches to medicine?

I have recently been in touch again with a psychiatrist who was pivotal in raising our awareness of biochemical issues our daughter was experiencing last year. We were met with considerable resistance by 'conventional' practitioners as to the possibility of a biochemical disorder contributing to our daughters sudden onset of serious and debilitating symptoms, despite a very strong family history of metabolic disorders and conditions causing malabsorption.

We have always – and still – believe that standard pharmaceutical treatment or psycho-therapies are important, however after 4 months of trying the approved 'standard' approach to treating our daughter, her symptoms were unrelenting and we saw her mental and physical condition deteriorate alarmingly. Through advice from this psychiatrist we found a complimentary specialist GP who not only was willing to listen to our concerns about the medication our daughter was on, but also willing to investigate potential underlying biochemical issues. Blood tests results showed that our daughter had several severe deficiencies that shocked our regular GP, and supported the existence of an underlying biochemical issue as posited by the psychiatrist and specialist GP. Upon commencing treatment we quickly saw multiple positive changes. Our daughter is no longer experiencing severe and debilitating symptoms and is recovered enough that she has begun returning to work.

We were deeply shocked by the dogmatic and limiting attitude of some doctors, and the apparent fear of others to challenge the status quo. I also find it astonishing that in an age of rapid technological and scientific advancement, holding rigidly to the accepted medical paradigm despite evidence to the contrary seems to be more important than a patient's health outcome. I have no doubt that we would have lost our daughter if we had not defied conventional treatment, and am extremely grateful to the doctors who were willing to persist and investigate alternative causes and therapies despite the potential risk to their reputation. I believe further scientific investigation into alternative therapies is warranted, and that a sensible, integrative approach to conventional and emerging treatments will result in better health outcomes for all.

Thank you for your consideration and I hope for an opportunity to contribute our experiences to this vital discussion.

Yours sincerely

From: Sent: Sunday, 30 June 2019 10:56 AM

To: medboard consultation

Consultation on complementary and unconventional medicine and emerging treatments Subject:

I choose Option 1...

I served overseas for multiple deployments with the Australian

During this time I contracted multiple infections, including dengue fever and amebiasis. I have done EVERYTHING recommended by conventional medicine and I have actually gotten worse. Complementary and/or integrative medicine also has its own issues but it has been of greater benefit to me than traditional medicine to date.

Dr Anne Tonkin, Chair, Medical Board of Australia GPO Box 9958, Melbourne Victoria 3001. 6th May 2019





Dear Dr Tonkin,

I heard with horror and dismay that the Medical Board is seeking to limit doctors in their treatment options for patients eg, Vitamins, Minerals, treatment of chronic diseases and the use of compounded hormone treatments.

Firstly, please let me say that I am not a medical practitioner. I am a patient who battled chronic fatigue for a number of years. My GP did every test that was available to him but was not able to identify the cause. I was told that no more could be done for me.

That left me with having problems getting out of bed, which I had to return to after a couple of hours. I looked for others who had a similar problem, looking for a way to start living again. I was fortunate to come across some with chronic fatigue whose problem was being addressed by a GP who was addressing his problem and slowly giving his life back by using amongst other things vitamins and minerals.

I saw this GP as the local area chronic fatigue Dr had retired.

Progressively my new GP was able to restore my life where as your standard GP had failed to treat my condition. I cannot explain the details of my treatment, but I can say that I was referred to various specialists after a range of tests.

I have managed to operate my vineyard and winery since my health was restored as well as studying and completing my degree of Viticulture and Oenology at Curtin University. Before this, I spent much of my time in bed.

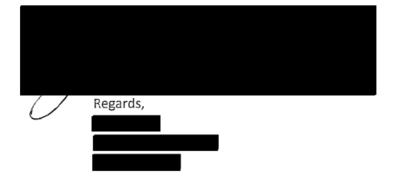
I am now 69 years of age and sincerely hope that when normal medicine fails, that the option for someone like me to find a GP who thinks outside the box will always be available and that no limitations are instituted in the interests of some form of "medical purity".

After all, as the Dalai Lama says "if you cannot help please do not harm" as you would if you seek to restrict treatment options for registered Medical Practitioners.

I would appreciate a response to this later. Please do not attempt to "baffle" me with medical mumo-jumbo such as" no proven science behind these treatments". There is — me and others who have regained their life after they slipped through the standard medical nets. The recent degree was my second as I was a Chartered Engineer before I took a tree change. I am capable of seeing through a "snow job".

As a result of my GP's current treatment options, I was able to return as a productive member of society.

I look forward to your response.



From: Sent:

Sunday, 30 June 2019 10:01 AM

To:

medboardconsultation

Subject:

Fwd: Consultation on complementary and unconventional medicine and emerging treatments

I choose to see an Integrative Medical Doctor because Conventional Medicine provided no answers as to why I was sick and I needed a wider range of diagnostic and treatment options.

Two and a half years ago I went to see my regular GP. I had severe brain fog, nausea, exhaustion, I was forgetting everything, I had stomach pains, was bloated and looked 5 months pregnant all the time and was not going to the bathroom probably at all. I was feeling so

sick I was spiralling into depression. My GP sent me for a quick little blood test.

I waited anxiously for the results with the pain getting worse each day. Finally she called to say the tests were clear and there was nothing wrong. I asked her, if the there is nothing wrong why was I feeling so sick. She said - I don't know, everything looks good to me, I think you just need some rest. I went to see an integrative doctor and as soon as I told her my symptoms she diagnosed me. She still sent me for a massive round of

tests cause she didn't want to miss anything but she knew what was wrong. Once all the tests came back and her diagnosis was confirmed (I have SIBO and my sugar levels were through the roof!) she treated me with an eating protocol eliminating sugars from my diet and a very short course of antibiotic that needed to be compounded. I have never felt better and the problem has never come back. I honestly don't know where I'd be without integrative medicine - it honestly saved me.

Please don't take this treatment away - options are a good thing and very important to people's health.

Medical Board Submission

Regarding the public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments. As an Australian citizen/resident I feel it's important that I have the freedom of choice in the type of medical care that I use to address my chronic health issues.

I have been suffering from Hashimoto disease, I believe that conventional medical doctors did not successfully treat my condition(s) and bring me to a satisfactory level of health.

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

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

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

Concerned.

Name:

Date: 04/04/19

Sent: Thursday, 27 June 2019 6:23 PM

To: Subject: medboardconsultation Integrative medicine

Importance:

High

Dear Sir/Madam,

I wish to express my concern on current developments to undermine the Holistic Approach to Health that successfully is run by the practitioners of the Australasian College of Nutritional and Environment Medicine. I would like to give you my own story.

I was diagnosed with a cancer to my urethra.

I choose to have a holistic treatment.

This Holistic treatment has helped me to overcome sickness and after 8 years the cancer has disappeared . I cannot thank enough to the practitioners who successfully helped me to overcome my sickness and be a healthy individual,

Yours sincerely,

Note: Current Practitioners use sound medical protocols in line with the guidelines of the Medical Board.

Submission to the Consultation on complementary and unconventional medicine and emerging treatments"

I am making this submission to this public discussion because I am appalled at the idea that the Medical Board wants to shut down the unconventional medicine industry. I am incredibly impressed with modern medicine in the role of surgery and emergency medicine but I feel it does not achieve the same level of expertise in treating chronic illnesses.

There would be no need for complementary/unconventional medicine if people recovered from many of the chronic illnesses that beset this country if these patients were recovering using conventional medicine.

The growth of the complementary/unconventional/integrative medicine is a direct result of the failure of conventional medicine treating chronic conditions.

I am writing as a mother of a mentally ill son, who at the start of his life in his twenties had a Master's degree in Biomathematics and was a top sportsman representing in Cross Country running. He was diagnosed with Paranoid Schizophrenia in 1990, and his life has never been the same since. He has been tried on many many drugs, it has cost the taxpayers a huge amount to keep him in drugs and rehab — it has been distressing for his whole family. One lot of drugs he was on, Olanzapine is now known to cause Diabetes and I do not know how it was approved by the FDA in the USA to be used for patients. His weight ballooned and he developed Diabetes. He was then prescribed Metformin to counteract that drug, which resulted in kidney failure, and it is a known side effect, according to the physician treating him in the Emergency department of the hospital. He is still unable to work and is on a Disability pension despite being seen by conventional medical doctors and psychiatrists for nearly 30 years. Why the College of Psychiatry is not actively seeking new treatments knowing that so many people have been let down by the treatments they prescribe I do not know? His health has been harmed by conventional medicine with all the drugs he has been given, and his mental health is still poor.

How could an alternative treatment be worse than that? In mental health there is no scientific diagnostic test, most Psychiatrists use guesswork and experience to make a patient diagnosis, then have to guess at which drug might or might not help the patient. Please tell me where is the "scientific evidence" in that branch of medicine?

Is it any wonder, people turn to alternatives, integrative, and other ways of medicine to try to recover themselves, because if you have a chronic illness, main stream medicine does not have a good record of helping people recover – sometimes they help symptoms but usually you are forced to take medicine for the res to your life.

There is more chronic illness than ever before, one in four people in the USA suffer from a chronic illness, and it is getting worse.

Instead of the Medical Board and the Friends of Science worrying so much about these other therapies, why don't they make sure their training of doctors includes giving them skills to

help chronic illnesses as well as they train surgeons, and emergency doctors? Do these doctors even know what skills/training complementary doctors receive? Do they ask themselves why so many people are paying good money to go to these doctors? Have they spoken to people who have tried other therapies and the results?

I am sure the Pharmaceutical Industry is also looking at the \$3.14 billion being spent by Australians and feels the money should be going to them. If all their drugs worked people would use them. However, you usually have to take another drug to counteract the side effects of the first drug. People are getting sick of being sick.

This public submission is so badly written, I had to read it about six times to understand what you were trying to say, and I am still not quite sure.

When the Medical Board and the Friends of Science can point to the recovery of most people with a chronic illness, they can then confidently try to rid the world of those doctors who have undertaken at their own expense, in their own time to educate themselves further. It would save the country a great deal of money if the Medical Board made sure many of the medical training courses for doctors included some of the more successful "alternative treatment" so that patients would not need to try to find a doctor who can successful help them with their chronic illness.

This public paper is a very disappointing waste of the time and money by the Medical Board, because the Medical Board should be asking themselves why so many people with chronic illnesses are not recovering using conventional medicine, and how they can help these patients?



From: Sent:

Tuesday, 25 June 2019 12:45 PM

To:

medboardconsultation

Cc:

meaboaraconsaitation

Subject:

Consultation on complementary and unconventional medicine and emerging treatments.

Consultation document on complementary and unconventional medicine and emerging treatments.

Name: Age: 41

Contact:

I have been diagnosed with Hypothyroidism as the age of 23. Looking back with the knowledge I've gained over the last 3-4 years, I realise my thyroid problems have started around 16 years of age.

I started Thyroxine medication at the time of diagnoses. Over the years, my symptoms just got worse and worse. I had a strong suspicion that all the symptoms I was struggling with was directly related to my thyroid, but it was only until I discovered Functional medicine that it was confirmed.

I was struggling with things like severe constipation, reflux, tiredness, muscle weakness, eye ticks, mood swings, breast cysts, polycystic ovaries, fibroid in my uterus, adenomyosis, constant sinus problems, painful knees, feeling anxious, Raynaud's syndrome, heart palpitations, shortness of breath, problems with sleep, sleep apnoea, hair loss, rosacea, weight fluctuations, food allergies, other allergies, reaction to my Thyroxine, etc. etc.

I kept using my thyroxine, as I was not aware of any other medications available at the time. I was also taking Nexium for the constant reflux, specially at night time. I used Rozex for my rosacea and vitamin D.

I was at an all-time low and felt like giving up as there was just no doctor who was helping me at the time. Once I discovered integrative medicine via online health summits, I started looking for an integrative doctor to treat me. I realised that I had an autoimmune disease, Hashimoto's, which no doctor has before explained to me before. I was already 37 at the time I found integrative medicine. It was very difficult to find a doctor and it took me a long time to find one. In the mean time I started with some basic changes like diet, detoxing, supplements etc. After finally finding a doctor my treatment changed from treating symptoms, to looking at the cause for my Hashimoto's and what I can do to support my immune system. I changed medications which made a huge difference to my overall health and wellbeing, as my body was not reacting positive to the traditional T4 medications. I started a range of supportive supplements and the doctor did some basic further testing, revealing some imbalances and deficiencies I had which were addressed. For the first time I felt like someone is actually listening and understanding that all the symptoms I had and had some answers and positive solutions for me.

Since starting my lifestyle changes and my new treatment, my reflux completely disappeared (caused by reaction to gluten, although I do not have Coeliac disease. I have proven this by trying to eat gluten and reflux returned and then stopped eating it and reflux disappeared and I no longer need medication for it). Most of my symptoms have disappeared now. I still take thyroid medication, but I'm taking a combination of Tertroxine and Natural Desiccated Thyroid. Since diet and medication changes, I do not have constipation anymore and my allergies have improved drastically. My thyroid antibodies which have been over 1300 for many years, have dropped to 95 with my last blood test. It took me 14 months after I started making changes before I started to see my antibodies drop. So, it was not instant. I still have rosacea which comes and go, but it is not as bad as it used to be and is usually connected with high stress periods in my life as well as higher sugar intake. I still have breast cysts, but I've also learned that some foods, like egg, increase my pain levels for it. I have more energy and a better outlook at life. Some negatives were trying to get the right dose of medication and that also changed over time as my health improved. But I learned to recognise the symptoms through my doctor's guidance, and she helped me every time to find the balance again. I've learned that my body change and that I need to go with the changes. I feel hope again and I feel positive about the future and my health changes. I also know this is a lifelong journey and not a sprint and I do need my

integrative practitioners to guide me on this journey. I know that my doctor goes for constant training by the best integrative doctors out there and that she has made a big difference in my life.

Integrative medicine has given me hope; it has given me my life back. I can finally enjoy my family again and feel like I contribute into my children's life's instead of lying on the bed, only wanting to sleep, being in pain and feeling like death rolled over.

My youngest daughter also has Hashimoto's and integrative medicine has made a big difference in her life too and she has now the best possible outcome for her diagnoses as there is hope for her to live a better life than I had with all the pain and agony I had to go through. With her most recent blood tests her antibodies was back in the normal range, down from almost 500. This gives me hope for her health journey.

My husband and kids have me back again. I can partake in their life's again. I'm no longer a tired, grumpy mum who just need to sleep and hide. The changes I made has an impact on my family's lives too and they are healthier too now. It had a ripple effect.

I have great respect for my doctor as well as the naturopath my family work with, as they have truly listened to me and have actually taken steps that helped me to feel better, instead of feeling worse. They explain the tests they do very well and that empowers me to understand my own body better and contribute to my mental health too. They give me hope as I've experience first-hand positive changes that years of suffering and traditional treatment did not give me. They go to regular training to stay up to date with treatments and changes. They are doing tests that actually gives proper answers and different kinds of tests that reveals deficiencies etc. I have great respect for all the integrative medici which I've worked with so far and I firmly believe this is the future of medicine. This does not only give patients hope, but they actually help people who before could not be helped. I believe strongly that Integrative medicine is the way medicine should be going.

Monday, 1 April 2019 12:51 PM

Sent: To:

medboardconsultation

Subject:

Consultation on complementary and unconventional medicine and emerging treatments

To whom this may concern,

I am emailing to express my concern that you are looking to limit and control Integrative Doctors ability to prescribe complementary and unconventional medicines and, by doing this, are looking to control and monitor their practice.

As a young person, who is currently in remission from Bowel Cancer, I see an Integrative Doctor regularly for the holistic and unconventional approach they take to medicine. As you can imagine, I have very complex medical needs, which a regular GP is unable to accommodate, and I am adamant that I should be allowed to choose the medical treatment I feel is most appropriate to my needs. For me, this is integrative medicine for its unconventional options.

I have had great success with the treatments and approaches my Integrative Doctor has prescribed and administered, and know my life would be very different if I did not have these options available to me.

I am very concerned that you are looking to limit what these Doctors are able to do, and know that if you are successful, my quality of life will suffer. You will also be denying me my individual rights to choose the most appropriate treatment for my health.

Please re-consider your plan to limit and control what Integrative Doctors are allowed to do for the sake of myself, and many others, who rely on their treatments and support to manage complex health issues.

Sincerly,

Re: Consultation on contemporary and unconventional medicine and emerging treatments

Regarding this consultation, I chose option 1, because I want to be able to choose and have the option to visit an integrative medicine doctor without them potentially risking disciplinary action and deregistration.

My family and I have personally seen multiple integrative doctors. I had amenorrhoea for many years. I saw multiple conventional doctors first and they couldn't find anything wrong physiologically. Their treatment was the oral contraceptive pill but I could not tolerate them due to side effects, so I was left with no resolution to my condition. It's only after I've seen an integrative medicine doctor that they diagnosed me with polycystic ovarian syndrome and insulin resistance.

I choose to see an integrative doctor as I found that there was a gap in treatment options with doctors who only practice conventional medicine. They also had less time with their patients (appointments are only 15-30 minutes long) which limits their ability to collect information and think about differential diagnosis.

My integrative doctor combines both conventional and complementary medicine in their treatment approach. Personally, the treatment I was given combined both conventional medicine (I was given Metformin) and complementary medicine (a compounded biosimilar progesterone). I've had minimal side effects with the treatments and now have regular menses.

Integrative medicine doctors practice medicine under the same regulations as their conventional medicine counterparts. They already practice within the standards, rules and regulations that APHRA and the medical board sets. I do not see the need for an extra standard for integrative medicine doctors for the sole purpose of limiting their ability to provide the complementary treatments which some patients like myself choose to have.

On the point regarding the safety and efficacy of complementary treatment are not known. The integrative medicine doctors I have personally seen have all undergone further training and accreditation. Their recommended complementary medicine has research backing the efficacy.

Integrative medicine doctors should be readily accessible in the community so they could provide safe and effective complementary medicine treatments to patient's whose medical condition hasn't been adequately controlled through conventional medical treatments.

I believe the board has breached your own COAG principles by creating this paper which will limit patient's choice of seeing an integrative medicine doctor. This limitation will do exactly what the board is trying to prevent, stifling innovation and limiting the choices of treatment for patients. It will limit further research in the area of complementary medicine as the limited access means there is less commercial incentive to pursue research in the area.

I would like these proposed regulations to be withdrawn immediately.

Yours sincerely,

From: Sent:

Sunday, 24 March 2019 10:50 PM

To:

medboardconsultation

Subject:

Public consultation on complementary and unconventional medicine and emerging treatments

Medical Board Submission:

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

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

My partner has been suffering from a range of medical conditions including hypothyroidism, adrenal insufficiency, chronic urticaria and eczema, severe allergies, as well as chronic pain. She is only 27 years old and has been suffering for years, unable to fully contribute to society in a meaningful way. She has had to put her PhD on hold due to illness.

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

Pharmaceuticals and the use of conventional methods simply did not work (and in some instances also delivered unwanted side-effects) and, seemed to waste Medicare funds and resources let alone my own making the circumstances that much more trying.

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

If she cannot see an integrative doctor, or the Doctor is restricted in what they are able to prescribe for me, I feel that her health will continue to deteriorate and have a continuing impact on my family, my work, and my wellbeing let alone her own. I am also going to suffer under the upcoming changes to private health care, and will be cancelling my fund as a result.

Concerned,

24/03/2019

To whom it may concern,

My name is , I am a 30 year old female Australian citizen.

I am reaching out to express my concern around the proposed regulation changes for complementary and unconventional medicine and emerging treatments.

I strongly urge you to retain the status quo. I have outlined my reasons below.

Firstly, I reside in NSW and of the 11 complaints (over 9 years) published on the "Public consultation on complementary and unconventional medicine and emerging treatments" article all came from other states.

I am also concerned by a perpetual cycle of legislated reaction in response to a small number of issues or complaints.

In comparison to complaints against doctors practicing conventional medical treatments, 11 complaints across Australia as a whole, is small. In NSW alone this year (2019), 7 Doctors practicing conventional medicine were either disqualified or suspended for professional misconduct (https://www.hccc.nsw.gov.au).

I feel we are at risk of compromising a great deal of benefit to many people in Australia, because a small number of incidents have occurred and in some cases some people did not use a level of common sense when considering prescribed treatments.

My experience with integrative medical practice has been **extremely positive**.

To provide some context, I have spent the last 10 years going around in circles trying to get to the bottom of a number of debilitating symptoms that have significantly hindered my quality of life.

During this process I underwent a multitude of neurological tests, and subsequently unnecessary treatments both physically and psychologically:

- For 6 weeks I could not hold my head up due to an overdose of botoxilin in an attempt to manage my head tremor.
- I have a permanent scar on my face from a reaction to a machine used to measure my tremor during a movement test.
- I was even told to spin around in a chair regularly to get used to feeling dizzy all the time because my Doctors couldn't be bothered to get to the bottom of why I was dizzy all the time.

All of this was covered by Medicare and cost the government money, none of which helped at all, in fact with time my symptoms simply got worse.

I was repeatedly met with blank faces, a significant lack of knowledge and multiple different diagnoses.

It wasn't until I found my GP who practices integrative medicine that my whole life changed. His innovative and holistic approach has reduced the significance of my tremor, dizziness, constant

muscular and stomach pain, as well as significantly reduced my debilitating anxiety and improved my energy levels.

Once there was clear medical diagnosis on my condition, my Integrated Medical Practitioner discussed various treatment options openly with me. We agreed on a set plan which involves prescription medication, supplements, diet and regular IV treatments.

I would be at a loss without this treatment, and implore you to consider the enormous value integrative medicine provides when making the final decision on these guidelines.

At no point during this process did I feel my safety was compromised, I felt empowered and informed enough to make my own decision about my treatment options based on the support of my Integrated Medical Practitioner.

My life is now worth living, because of this innovative approach to medicine.

With this in mind, again I strongly urge you to retain the status quo.

Thank you for considering my opinion.

Kind Regards,

From: Sent: To: Subjec	Friday, 29 March 2019 1:54 PM medboardconsultation complementary and unconventional medicine and emerging treatments
То	
Ex	ecutive Officer, Medical, AHPRA
29	/3/19
Hi,	I wanted to have a say as it is appalling how so many of us are unwell with auto immune diseases and are being treated appalling buy conventional medical doctors who cant or wont help. An example is thyroid testing, conventional doctors will only test TSH and T4 but the full panel is required to get the correct dose of medication if needed. So many of us are going through years of being unwell with so much trauma to everyday life when it really can be quiet simple.I still do not have my symptoms sorted, I am on my 5th doctor after 3 years of being unwell and spending money on unneeded tests. Im going to a conventional medicine doctor today as I have an eyelid problem, is it a problem on its own or is it because my antibodies are up to 1000. Just because I look okay it doesnt seem to matter if my body on the inside feels like that of an 80 year old. There is a big chance I wont get help. Conventional medicine practises are failing us. I have had to pay for blood test which refugees get for free, but thats another story.
1.	Do you agree with the proposed term 'complementary and unconventional medicine and emerging treatments'? If not, what term should be used and how should it be defined? I think the term is insulting to call some of them complimentary and unconventional medicine and emerging treatments. "New age Health Medicine". Some people, those with autoimune diseases, for example rely on this type of medical help where the conventional system fails them and hinders their quality of life in a major way.
2.	Do you agree with the proposed definition of complementary and unconventional medicine and emerging treatments – 'any assessment, diagnostic technique or procedure, diagnosis, practice, ^{i[1]} medicine, therapy or treatment that is not considered to be part of conventional medicine, whether used in addition to, or instead of, conventional medicine. This includes unconventional use of approved medical devices and therapies.' If not, how should it be defined?
3.	Do you agree with the nature and extent of the issues identified in relation to medical practitioners who provide 'complementary and unconventional medicine and emerging treatments'? Yes, And it should be regulated to make sure everyone has the correct registrations/licenses, But I don't agree that doctors trying to help those with autoimmune diseases should be told what they can prescribe and what they cannot, For example I have thyroid trouble and very high antibodies, conventional doctors say live with it, or take this synthetic stuff and go home, then if I go back asking for more help I get told you must have

depression or anxiety take this. I am a member of several Hashimotos autoimmune groups and almost

every member has to go through this for up to 10 years plus until they are lucky enough through word of mouth find a doctor who also practices unconventional and conventional medicine who will genuinely help. These doctors are not plentiful to find and we waste a lot of time and money on conventional doctors, thousands, getting nowhere.



^{i[1]} **Practice** means any role, whether remunerated or not, in which the individual uses their skills and

knowledge as a health practitioner in their profession. For the purposes of these guidelines, practice is not restricted to the provision of direct clinical care. It also includes using professional knowledge in a direct non-clinical relationship with clients, working in management, administration, education, research, advisory, regulatory or policy development roles, and any other roles that impact on safe, effective delivery of services in the profession.



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

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

No. The proposed term encompasses a broad range of methodologies with varying degrees of rigour and fails to distinguish between them. Terms used to describe practices outside of what the Board considers conventional should be more precise and descriptive.

There should be several distinct terms, e.g. the term "manual medicine" should be used to describe the work of registered university-trained practitioners such as physiotherapists, osteopaths and chiropractors who diagnose primarily through palpation and treat according to definitions of conditions describing the functional state of connective tissues, distinguished from "manual therapy" such as cranio-sacral therapy or massage which is performed with a lower level of training and rigour. To categorise a cranio-sacral therapist trained over a few weekends at the same level as an osteopath, and then to fail to distinguish the nature of their interventions from those of a homeopath, is patently ridiculous.

2. Do you agree with the proposed definition of complementary and unconventional medicine and emerging treatments – 'any assessment, diagnostic technique or procedure, diagnosis, practice,1 medicine, therapy or treatment that is not usually considered to be part of conventional medicine, whether used in addition to, or instead of, conventional medicine. This includes unconventional use of approved medical devices and therapies.' If not, how should it be defined?

It is impossible to discuss what lies outside of "conventional" medicine when no definition of conventional medicine has been offered. I am not a health practitioner but I am a science graduate who has become disabled through a combination of inaction and inappropriate interventions by what I believe the Board considers to be conventional medicine. As such I offer the following definition of conventional medicine:

Practice that is aligned with, rather than independent of, the commercial interests of the pharmaceutical industry and adopts the following norms:

- Uncritical acceptance of evidence produced by pharmaceutical suppliers coupled with dismissal of evidence produced by anyone else.
- Acceptance of narrow definitions of medical conditions for which only a
 pharmaceutical product can possibly be proven effective, and refusal to apply
 alternative approaches to conditions when the pharmaceutical approach is clearly

Public consultation on complementary and unconventional medicine and emerging treatments



failing (e.g. addressing chronic hyperventilation in asthma sufferers instead of, or in conjunction with, pharmaceutical intervention).

- Practice of "textbook based medicine" where any patient whose condition is not simple or lucrative to treat is either dismissed as psychologically disturbed or coerced to accept free samples and ongoing prescription of a product in which the practitioner clearly has a pecuniary interest. Without medical confirmation of their condition such patients may be placed in a desperate financial and social position and become vulnerable to a range of unethical practices both inside and outside the health sector.
- Blindness to the extent of physiological side-effects of many pharmaceutical interventions (e.g. disruption to the autonomic nervous system).
- Acceptance of conflicts of interest such as "wining and dining" of practitioners by suppliers, a practice proven to increase prescription rates of individual products and totally inconsistent with the principles of EBM.

I have learned to my own cost that conventional medicine is only designed and proven to work for otherwise healthy people with single acute conditions, and is out of its depth when confronted with complex chronic illness. The evidence basis on which conventional medicine relies does not reliably apply in multi-systemic illnesses, which means that any engagement with or treatment of complex chronic illness likely falls outside the Board's covert definition of conventional medicine even though it's something that the general public expects of the medical profession and is vital for public health and economic prosperity.

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

With respect to the nature of the issues identified I am satisfied that there are no issues identified in the practice of non-conventional medicine that are not also prevalent in conventional medical practice. As such I see no reason why the guidelines for non-conventional practice should be any different to those applying to conventional practice.

With respect to the extent of the issues, the Board has been unable to identify substantial harm being caused through non-conventional interventions and has not provided comparative data of harm caused by conventional interventions. Given the prevalence of harm caused by conventional medical intervention I am satisfied from the evidence presented that non-conventional medicine is safer than conventional medicine. I believe that patients should have the freedom to pursue experimental treatments for conditions

Submission Public consultation on complementary and unconventional medicine and emerging treatments



that are currently incurable/untreatable by conventional medicine if said patients consider the risks acceptable, and that in such cases safety data cannot be reliably compared with the conventional medical approach of non-intervention.

With respect to the statement "Concerns about the cost and exploitation of patients are more commonly raised by other parties" I think the Board needs to consider who those parties are and what their motives might be before lending them credence, and should also consider in a general sense what rights "other parties" have in determining anyone's healthcare options and choices. There is ample scope within current regulatory systems for those with a vested interest in the status quo to limit the availability of safe and effective treatments that may not be proven effective against the definitions of medical conditions but improve the lives of patients who cannot be helped by conventional medicine. Almost every safe effective non-conventional treatment that has helped me over the past 15 years has been targeted by "other parties", and it hasn't escaped my attention that the conventional treatments to which these treatments provide an alternative consist of the consumption of pharmaceutical products on an indefinite basis.

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

As someone who became unnecessarily disabled because medical practitioners were either unaware that I could have been effectively treated by manual medicine or not permitted to say so, I have long been concerned that Australian medical practitioners are inadequately aware of when a patient should be referred to other health professions and that they are not permitted to do so even when they are aware.

I have also found that the training of medical practitioners makes them very good at reductionist approaches but relatively poor at lateral or holistic approaches, and unaware of their own biases. As such I've not found even "integrative" practitioners very useful in addressing my own complex health issues, because even when they're open to non-conventional approaches they are prone to narrow fixation on a particular avenue of treatment. I believe that there is a need in the health system for practitioners who are abreast of a wide range of interventions both inside and outside conventional medicine and able to guide complex chronic patients. The Board can decide that medical practitioners will do no such thing but the demand will remain and the vacuum will be filled by others.



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

None beyond what is required for those receiving conventional treatments.

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

There exists ample evidence and data for both the corruption of the scientific process by the pharmaceutical industry and the effectiveness of non-pharmaceutical approaches but the lack of rigour evident in the proposal document convinces me that the Board is committed to avoiding becoming better informed.

The Board should remain mindful that the existence of a minority of people who respond adversely to conventional treatment is proven in many trials. In conventional practice this minority is dismissed as statistically insignificant and no barrier to the introduction and acceptance of an intervention, but in actual medical practice these are real people who are presenting to practitioners and supposedly entitled to safe healthcare. Even if they comprise just 1% of the population that's 250,000 Australians who are at risk from conventional medicine and require access to alternative approaches for their own safety.

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

Yes.

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

I don't see that they're warranted.

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

Public consultation on complementary and unconventional medicine and emerging treatments



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

In my experience members of the medical establishment have no grasp of the reasons why people look outside conventional medicine. It's inconceivable to them that conventional medicine is not the best approach for all people in all circumstances, which I personally find inconceivable because I wouldn't still be alive if I hadn't looked outside conventional medicine.

This same establishment mentality permeates the proposal document. The Board is unconsciously ignorant of the reasons why patients are forced to seek treatment outside of conventional medicine and of the harm that would result if awareness of and access to non-conventional intervention was to be further restricted.

Most people who seek non-conventional treatment tried conventional treatment first. If the Board is genuinely concerned about the risks posed by "unproven" treatments or to vulnerable patients it should first seek to understand why patients are looking outside of conventional medicine. The implicit assumption that we're all ignorant and gullible is way wide of the mark.

On a more fundamental level I am concerned that the true "concerns" here have nothing to do with public health and safety and everything to do with trying to preserve and strengthen a commercial status quo. I would like to be able to believe that the Board would prioritise safe, effective and efficient health outcomes over entrenched commercial interests but this has not been my experience as a patient, and the proposal document has, if anything, only confirmed for me that the unnecessarily adverse outcomes I have experienced as a patient of conventional medicine are exactly what the Board intends for myself and the many other Australians similarly afflicted by complex chronic conditions.

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

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

I would prefer a more sophisticated and inclusive option but I do not consider that the

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Sent: Sunday, 7 April 2019 5:28 PM **To:** medboardconsultation

Subject: response to consultation paper

Response to a consultation paper on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments.

My name is . I am 18 years old. I have benefited from a mix and a complementary and mainstream medicine my entire life. The only adverse side effects I have encountered was when prescribed drugs by a mainstream medical practitioner. I have multiple learning disabilities and food sensitivities. My complementary health practitioners have enabled me to live a full and healthy life. Yes I am responding to this out of concern that others like me may not have the choices and therefore achieve the outcomes I have. My mainstream medical practitioners are aware that I use complementary medicine and support this choice.

Responses to Questions for Consideration:

- 1. The terms proposed by the medical board are clear explanations.
- 2. I agree with the definition proposed by the medical board.
- 3. I do not agree with the statement as the medical board has ignored evidence that chiropractors, exercise therapies like Pilates and naturopathy can be effective in maintaining good health. We need a health system rather than one that treats sickness. To under emphasise this evidence may ignore medical doctors over reliance on using drugs to solve the patient's problems, or not explaining the adverse side effects that are possible. The tightening of guidelines sends a message that improving treatment methods like stem cell treatment is viewed as unacceptable. There is also clear evidence that medical use of cannabis for conditions such as epilepsy can bring relief to those who live with this debilitating condition. I am just grateful that I am not one of them.

Integrative medicine should be used by combining the best of conventional western medicine and complementary medicine and therapies within broad medical practice. The use of non-invasive checks such as applied kinesiology fits the standard of "doing no harm" while providing additional information about what may be happening for the patient.

- 4. There have been no concerns.
- 5. Overly restrictive safeguards would limit consumer choice and potentially bankrupt health professionals' businesses. The statement as published assumes that patients are passive recipients who have not done any research on complementary and unconventional medicines and emerging treatment and how it fits their values and lifestyle.
- 6. There is evidence published on a range of credible websites, particularly overseas. The biased view of research in Australia that tends to rely on funding from drug companies is concerning. If the medical board was really interested in the expansion of medical treatments, they would approach research institutions to complete domestic research for the good of us all. If science is repeatable, explainable and effective, why would you not support these treatments?
- 7. The current regulation is adequate to address the issues.
- 8. It would not address the issues. The change in tone and objectives seems inconsistent with previous statements in the document also additional safeguards may limit consumer choice and stifle innovation and research and if guidelines are put into place, they should be for all medical practitioners to stop malpractice not just ones who provide complementary and unconventional medicine and treatments. If the board has the expectation outlined of complementary medical practitioners then surely, they should have the same expectations of medical doctors. I have experienced a lack of this level of explanation and
- 9. The draft guidelines seem to be around limiting customer choice.

information about my medical treatment by a previous doctor.

- 10. Some concerns that the board has not considered are that general practitioners don't have time to outline other options for treatment. The board has not considered that some of the side effects of conventional medicine are pretty horrendous. When prescribed Ritalin as a six-year-old I became suicidal. I think that is shocking and my parents were encouraged to continue to see if I improved over time. They decided not to take that risk.
- 11. Option one best addresses the issues identified. It retains the status quo by providing general guidance about the board's expectation of practitioners which allows patients to coordinate practitioners from multiple disciplines to get a better quality of life.

Beyond these areas where the board has requested feedback, I have concerns about mainstream drug treatments that expose patients to adverse side effects. An over reliance on drugs and focus on treating ill-health rather than supporting health does not keep people healthy.

Tuesday, 25 June 2019 7:40 PM

Sent: To:

medboardconsultation

Subject:

Consultation on complementary and unconventional medicine and emerging treatments

To whom it may concern,

I am a current university student who writes this email having come across plans for new regulations on doctors practising integrative medicine. Personally, I have experienced the great impact integrative medicine can have on one's condition of health and I strongly advocate against the passing of these new regulations. From my early years of high school, I suffered from an autoimmune disease, which saw no cure using conventional methods of drugs. These drugs only sought to alleviate symptoms and weren't able to address the root cause of my autoimmunity. It was only through an integrative medical approach, which addressed lifestyle issues related to my diet and habits, that I was able to make a breakthrough and put my condition into remission for three years. I am distinctly aware of the skepticism surrounding integrative medicine, with many believing it to be purely placebo. However, I believe that there should be more informed research done before any regulations are put into place - after all, there are currently many patients who have their only source of hope in integrative medicine.

Regards,

From: Sent:

Saturday, 27 April 2019 2:11 PM

To:

medboardconsultation

Subject:

Fw: Change of existing Code of Conduct 2014

From:

Sent: Saturday, 27 April 2019 2:09 PM

To:

Subject: Change of existing Code of Conduct 2014

Hi

I feel very concerned at the thought of the Code of Conduct 2014 being changed so that GP's cannot sell or practise naturopathy and it's natural medications.

I mean what better person than a qualified doctor to be treating you in natural ways if your condition allows and your willing! I have been going to naturopaths since my early 20's and I don't have to now as my GP is also qualified in these areas. I have Rheumatoid Arthritis and have to take quite heavy medication for this but to help keep my system healthy and my joints reasonable my doctor is able to give me certain natural products whilst I'm on my medication and I have peace of mind in this.

I'm asking that you give this change your considering serious thought as this is a step backwards in medicine not forwards!!

Yours sincerely

MEDICARE NUMBER:

I am almost 70 years old and have been using a combination of GP prescribed medicines and complementary/naturopathic prescribed and alternative treatments for 45 years. I was strangely unwell in my 20's and it was suggested that I try some alternative medicines and use unconventional treatments at the time. MANY of these are now clinically proven to be useful in the healing process. I am an HLAB 27 + patient and often had to handle unfair criticism from unbelievers. Thanks to both types of approaches I am now a fulfilled, happy person who approaches life with confidence though still a chronic pain sufferer. I will be forever grateful for the care provided by my practicioners, whom I believe saved my life. I FULLY SUPPORT PATIENT ACCESS TO COMPLEMENTARY AND INTERGRATIVE MEDICINE AND MY GP AND SPECIALISTS SHOULD NOT BE RESTRICTED IN PROVIDING INTEGRATIVE MEDICINES AND TREATMENTS. THIS IS THE 21ST CENTURY AND IT IS TIME THE POWERS THAT BE RECOGNIZE HOW USEFUL INTERGRATIVE MEDICINE IS. THIS SHOULD ALSO BE REFLECTED IN PRESCRIPTIONS AND INCLUDED IN LESS COSTLY SCRIPTS/TREATMENTS FOR ALL PATIENTS ESPECIALLY CHRONICLY ILL PATIENTS AND PENSIONERS.

I believe it is my legal right to choose the type of medical care best for me and as a citizen in a democratic country this is important to me and my family. We need to keep the status quo and not tie the hands of our wonderful doctors by setting yet another chart of guidelines for them. They already have a CODE OF CONDUCT TO ADHERE TO. An integrative approach to all healing is not just common sense but essential as proved in my personal case and millions of others. Thankyou for allowing complementary and integrative medicinal approaches as an option for doctors and patients.

I currently am recovering from a stroke and also have severe bronchitis and sinus and with help from anti-biotics and Kaloba drops, an alternative healing aid, I have been able to type this submission.

From: Sent:

Thursday, 7 March 2019 5:21 PM

To:

medboardconsultation

Subject: REGULATION OF MEDICAL PRACTITIONERS

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

Conventional general practice doctors were unable to treat my daughters stomache condition nor bring it to a satisfactory outcome.

Her condition remained unchanged until we consulted with an integrative medical doctor who included lifestyle change, diet and supplements to address this problem.

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

Regards



Sent: Thursday, 4 April 2019 2:41 PM

To: medboardconsultation

Subject: URGENT Re censorship of integrative medicine in Australia.

Medical Board Submission

Dear Sir/Madam,

Regarding the public consultation on clearer regulation of medical practitioners who provide complementary and

unconventional medicine and emerging treatments

As an Australian 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 Hasimoto's Disease:

Conventional medical doctors have not been able to successfully treat my condition(s) and bring me to a satisfactory level of health. Pharmaceuticals and the use of conventional methods simply did not work (and in some instances also delivered unwanted side-effects in my case) and, seemed to waste Medicare funds and resources.

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

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

Concerned,





The Executive Officer Medical AHPRA, GPO Box 9958 Melbourne 3001 4 April 2019

RE: PUBLIC CONSULTATION ON COMPLEMENTARY MEDICINE AND EMERGING TREATMENTS

To whom it may concern,

My name is ______, I live in _____ and am _____ years old. 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 explain below. I am happy for this information to be on the record.

Specifically, it is alarming that once more, 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. It is even more shocking that the Medical Board intend to create a set of guidelines which will more that likely restrict my highly capable doctors from practising good health care that is essential to my recovery from this illness. This intent, as far as I can tell, of the Medical Board is based on outdated research, as well as the policies of large pharmaceutical and insurance companies.

I cannot thank my doctors enough for the risks they take upon themselves to ensure that the combined traditional and complementary protocols work. My treatment journey thus far show that it is *only* through the thorough investigations and care of my current integrative GP that I have started to show improvement after 3 years of illness. Indeed, the care of doctors in the first year of my illness, who had one 'specialty' (specifically rheumatology and immunology), saw my health decline rapidly as they were focused on treating symptoms and not the root cause of the illness. It is

only through the comprehensive treatment options and investigations offered by my integrative GP that I have been able to slowly, but surely, get better; I have improved so much that within the next couple of months I plan to be going back to work 1-2 days a week, after three years of debilitating illness.

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. Perhaps we should look to progressive countries such as Switzerland who are doing the complete opposite and are encouraging the use of complementary medicines?

I have used Complementary, Unconventional and Emerging Medicine. I highly value its availability and am very happy with how it is being practiced. My treating doctor provides me with extensive treatment options, backed by peer-reviewed research, all of these options and research have been provided to me. We discuss the relative merits and potential problems/side effects, and I am free to make decisions regarding my own personal medical treatment.

The suggestion of strengthened guidelines is far too controlling. It is an attack on my right to seek any treatment that I choose, which, as evidenced in the improvement of my symptoms and ability to go back to work after 3 years of illness, clearly works. Whether or not you agree with the diagnoses I have been given, or the treatment plans, it is not within the Medical Board's purview to jeopardise my future, and my family's future.

As such, my preferred choice of the proposed outcomes is to retain the status quo. Otherwise, fellow sufferers of this awful disease will only have the option of travelling overseas for treatment. This leaves them open to a greater risk of complications in treatment. Australia is not a third world country - it is my expectation that I should be able to obtain the treatment of my choice here at home.

Furthermore, If the Medical Board eventually decides to implement Option 2 (greater regulation), I request that:

- It applies to ALL medical practitioners, with the same onus of exhaustive exposition of all treatment options, research etc;
- That the Board accepts that integrative medicine, utilising Complementary or Unconventional or Emerging Medicines, *as well as* conventional medicine, will

be recognised as a Specialty, in order to allow increased Medicare rebates to help cover the increased costs of fulfilling the new regulations.

Yours Sincerely, , 4 April 2019