



**Consumer Healthcare
Products Australia**

**Consumer Healthcare
Products Australia**

ABN 55 082 798 952

Suite 1, Level 2
35 Chandos Street
St Leonards NSW 2065

+61 2 9922 5111
PO Box 209, St Leonards NSW 1590

28 June 2019

info@chpaustralia.com.au
www.chpaustralia.com.au

Executive Officer, Medical
AHPRA
GPO Box 9958
Melbourne 3001

Dear Sir/Madam

Consultation on complementary and unconventional medicine and emerging treatments

CHP Australia is the leading voice and industry body for manufacturers and distributors of consumer healthcare products, which includes non-prescription medicines. We strive to advance consumer health through responsible Self Care and were previously known as the Australian Self Medication Industry (ASMI).

Our key priorities for the industry include improving health literacy, growing the consumer healthcare products industry and increasing access to medicines where appropriate.

Complementary medicines are a recognised and credible part of the Australian healthcare system. There are close to 12,000 complementary medicines listed on the Australian Register of Therapeutic Goods with the national medicine regulator – the Therapeutic Goods Administration – and utilised by approximately 70% of the Australian population¹. Complementary medicines also play an important role in traditional health practices of the diverse nationalities that make up the Australian population. CHP Australia supports the ongoing access of Australian consumers to complementary medicines.

The definitions of complementary medicine provided within the Medical Board of Australia consultation paper presents an unclear context for the proposed guidance, with a lack of clear scope as to what does or does not represent conventional medicine practice. CHP Australia holds concerns that the scope as it is defined has potential to compromise consumer access to safe and effective complementary medicines and practice. Any work pursued by the Medical Board of Australia to strengthen guidance for medical practitioners who provide complementary medicine should seek to utilise clear and consistent definitions to ensure that the scope of guidance is appropriate.

The consultation process raises concerns. The discussion paper outlines expectations and examples that frame the proposed guidance, but which may or may not be included in the final document. This demonstrates a lack of clarity between the current discussion and the final parameters that may be set by the Medical Board of Australia.

Advancing consumer health through responsible self care



It is clear from the public response to this consultation that consumers are interested in maintaining their choices in healthcare and are engaged in pursuing healthcare treatments and systems that may not be defined by the discussion paper as 'conventional'. Maintaining access to safe and effective products and modalities is important for sustaining consumer engagement in healthcare, however it is critical that consumers have the information and skills available to engage in their healthcare safely and effectively. By the last measure from the ABS in 2006, 60% of Australians have less than adequate health literacyⁱⁱ. In an age where our access to technology, information and health advice is unprecedented, we believe that this is simply unacceptable and that more needs to be done.

Having adequate health literacy means that an individual is able to seek help when they require, identify ailments that they can self-treat, read medicine labels, understand medicine advertisements and more. Healthcare professionals play a critically important role in improving individual health literacy levels. It is our opinion that an environment where consumers are more comfortable engaging in greater conversations with healthcare professionals about medicines and treatments is much more desirable than closing off these conversations.

The discussion paper highlights the need for consumers to be able to make informed choices around their healthcare. We agree. We are however concerned that the current proposal could restrict access to chosen treatments without addressing the critical need for greater health conversations and subsequently an improved level of health literacy, which underpins an effective healthcare system and healthy population.

CHP Australia would welcome the opportunity to be engaged in any further consultation on this topic by the Medical Board of Australia.

Kind Regards

ⁱ Australian National Audit Office (2011), *Audit Report No.3 2011-12 Therapeutic Goods Regulation: Complementary Medicines*, 2011, Commonwealth of Australia, p. 13.

ⁱⁱ Australian Bureau of Statistics (2008), *Health Literacy, Australia, 2006* (ABS cat. no. 4233.0)