

28 June 2019

Medical Board of Australia

Via email:

medboardconsultation@ahpra.gov.au

Dear Medical Board of Australia

I am writing to provide the views of Blackmores regarding the Medical Board's public consultation paper on proposed "*Clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments*".

As Australia's leading natural health company, Blackmores believes the proposal will significantly limit the practice of integrative medicine and the use of complementary and alternative medicines.

This would be a very negative outcome for the health, wellbeing and freedom of choice of Australians.

We firmly oppose the proposed changes.

All doctors should be treated equally

The proposal would see a split between conventional doctors and integrative medicine doctors. It would sanction doctors who use safe and effective integrative medicine in their day-to-day practice.

Integrative medicine doctors combine quality conventional medicine with safe and effective complementary medicine to improve health and reduce unnecessary medical treatments.

They embrace prevention as a first principle of healthcare, help manage complex illness and care for patients for whom conventional medicine has not assisted.

The reality is that "10-minute medicine" does not suit all Australians. Integrative doctors want to offer alternatives, including a more holistic approach with the potential for better prevention and broader treatment options. They have undergone training in addition to their conventional medical training.

Patients that may benefit include those suffering complex and chronic illnesses such as obesity, diabetes, chronic fatigue syndrome, Alzheimer's, mental health disorders and many more common health problems.

The notion that a doctor who embraces the safe use of complementary medicines could be struck off for doing so is simply outrageous. It would be a draconian, archaic and irresponsible position for the Medical Board to adopt.

The current code of conduct should apply

As you are aware, the Medical Board already has the "*Good Medical Practice: a code of conduct*", which sets out what is expected of all doctors registered to practise medicine in Australia.

The code is a very strong basis for providing high quality patient care, including when to provide complementary medicine advice and recommendations to patients.

It would appear that the MBA is confusing 'Good Medical Practice' with 'Conventional Medicine' as if they are one and the same.

Conventional Medicine is generally a narrowly defined approach to medicine referring to the use of drugs, radiation or surgery. Clearly, there is much that falls outside of this definition which still falls well within Good Medical Practice.

Good Medical Practice includes conventional medicine as well as complementary medicine.

The current code should therefore remain the principle basis to support safe practices and safeguards for patients. The proposed new draconian regulations are simply unnecessary.

Complementary medicines are safe

The Therapeutic Goods Administration has never been able to confirm a single death in Australia that directly resulted from using complementary medicine.

By contrast, it is estimated that there are around 650,000 hospital presentations/admissions¹ every year due to medication-related problems.

Complementary medicines are highly regulated and provide safe alternatives for patients that feel conventional medicine has not worked.

The Medical Board has not provided any evidence that there is need to further regulate complementary medicine or integrative medicine.

In fact, rather than seeking to demonise integrative medicine doctors, we believe that not enough doctors consider the use of evidence-based complementary medicine.

We would encourage consideration of evidence for holistic or non-pharmaceutical approaches, especially in chronic conditions. The quick and easy approach of prescribing medication should not be the default option – especially given there is strong evidence of safety and efficacy for complementary medicine.

The new guidelines should not apply to complementary medicine

It is wrong for the Medical Board to group 'complementary medicine' with 'unconventional medicine' and 'emerging treatments'.

Each of these three separate terms describes a different concept scientific approach/set of conditions. Combining them as a single term is highly problematic for regulatory purposes, let alone being highly flawed as a scientific definition.

Doctors who practice complementary medicine within Integrative Medicine have nothing in common with 'unconventional medicine' or 'emerging therapies'.

Complementary medicines are highly regulated by the Therapeutic Goods Administration, are low-risk and have nothing in common with unconventional medicine and emerging treatments.

Concerns about potential conflict of interest

We are concerned by reports that two members of the Medical Board are (or have recently been) members of the "Friends of Science" movement (FSM).

FSM has a long-running campaign against integrative, complementary and alternative medicine.

It is concerning if members of the FSM were involved in developing the Board's proposal for regulating complementary, unconventional medicine and emerging treatments.

It is of critical importance that doctors, patients and the Australian public can have complete confidence and trust in the Medical Board. Any perception that the Board is acting under influence or furthering the agenda of FSM is deeply concerning.

We believe this is in itself a very strong reason not to implement the proposed changes.

Blackmores' concluding comments

One of the options that the proposal considers (on p2 of the public consultation document) is:

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.

We strongly support option one. No new regulations are required. The current code is more than adequate and has the right safeguards and standards.

Integrative Medicine should not be attacked simply because the Medical Board does not see it as 'conventional'.

Thank you for consideration of our views on this very important matter.

If you would like to discuss Blackmores' submission further, I would be happy to meet with you.

Alternatively, please feel free to contact Blackmores' Head of Public Affairs, [REDACTED], on [REDACTED] or via email at [REDACTED]

Kind regards

[REDACTED]
Marcus C Blackmore AM
Interim CEO

¹.Pharmaceutical Society of Australia 2019. *Medicine Safety: Take Care*. Canberra: PSA.