

Public consultation on complementary and unconventional medicine and emerging treatments

This submission is made in support of Option 1:

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

As health professionals within a compounding pharmacy group, we work closely with integrative medical doctors to provide the unmet medical needs of their patients. Therefore, we will predominantly address the concerns raised by the Board regarding the prescribing of compounded medicines by these doctors.

Our purpose-built, compounding facility was designed and fitted to comply with GMP standards, which are the same standards required by the TGA for the manufacture of therapeutic goods in Australia. This quality ensures the safety and efficacy of our medicines is upheld. We fully support all compounding pharmacies compliant to these standards as this will ensure that the medicine has been manufactured in circumstances that meet expected quality assurance processes.

The process of compounding is lawful, complex, and involves a close relationship with the prescribing practitioner to ensure evidence can be demonstrated, and meet the individual needs of the patient for whom standard medical treatment is not appropriate.

The Board raises the following concerns with prescription of compounded products by the medical doctors in question, which we will respond to:

- 1. That a medicine is prescribed for which a commercial product is available and suitable**
Compounding pharmacies are prohibited from supplying a medicine where a commercial product is available and suitable, and will inform the prescribing doctor if they are unaware of this being the case.
- 2. That a medicine is prescribed for which there is a lack of evidence to support the compounded product's use.**
Both the prescribing doctor and the compounding pharmacist will review the evidence related to the prescribed product. If there is insufficient evidence or concerns around the ingredient/s, the pharmacist will consult with the doctor to find a more appropriate solution together.
- 3. That a medicine has been manufactured in circumstances that don't meet expected quality assurance processes.**
We are compliant to GMP standards for the production of compounded medicines.
- 4. That a medicine has been manufactured in bulk rather than to meet an individual's needs.**
Compounding is a highly personalized system of manufacturing and must be made on an individual basis for patients. However, where an efficacious preparation has been established from an individual doctor with similar patient presentations, there is approval to keep small batches of the specific preparation on hand for that particular doctor.

The Board's understanding of the practice of compounding is misguided and unfairly implicates the practices of both our integrative medical doctors and compounding pharmacies.

Separate to this, we fully support the work of our integrative doctors and the value we see brought to the health of their patients on a daily basis.

Integrative doctors invest in training beyond the scope of the conventional GP, for the purpose of optimizing the quality of life of the patient and to appropriately manage the course of their disease or condition. Employing evidence-based strategies including nutrition, dietary changes, lifestyle modifications, herbal or other complementary therapies as adjunct or stand-alone therapies, is inherently a safer practice than standard drug therapy alone.

Drug therapy is the most common intervention in conventional medicine and is thus associated with a high incidence of adverse events including deaths. Annually, 650,000 hospital presentations are related to medication-related adverse events at a cost of \$1.4 billion to the economy.

Our integrative medical doctors deliver a valuable healthcare service to our community, particularly for patients that conventional medicine has failed to assist. The suggestion for additional guidelines will impact these patients the most, due to their doctors fearing sanctions for treatments offered.

With over 20 years of experience in the science-based tradition of compounding, our medicines have been increasingly utilized by a broad cross-section of the medical community including specialists, rather than limited to integrative medical doctors. In support of these doctors practicing "complementary and unconventional medicine, and emerging treatments", these are our reasons in support of Option 1 of the public consultation paper.

Sincerely,



24th June, 2019

(Please withhold all names if submission is published on the Board's website)