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Via email: [medicalboardconsultation@ahpra.gov.au](mailto:medicalboardconsultation@ahpra.gov.au)

8 April 2019

**RANZCO submission to public consultation on clearer regulation of medical practitioners on complementary and unconventional medicine and emerging treatments.**

The Royal Australian and New Zealand College of Ophthalmologists (RANZCO) welcomes the opportunity to comment on public consultation on clearer regulation of medical practitioners on complementary and unconventional medicine and emerging treatments.

RANZCO's mission is to drive improvements in eye health care in Australia, New Zealand and the Asia Pacific Region through continuing exceptional training, education, research and advocacy. Underpinning all of the College's work is a commitment to best patient outcomes, providing contemporary education, training and continuing professional development, evidence-based decision making, collaboration and collegiality.

RANZCO prefers Option 2 – Strengthen current guidance for medical practitioners who provide complimentary and unconventional medicine and emerging treatments through practice-specific guidelines that clearly articulate the Board's expectations of all medical practitioners and supplement the Board's Good medical practice: A code of conduct for doctors in Australia. Option 2 allows greater opportunities for the profession to self-regulate.

The regulation of medical practice and the maintenance of high standards should apply equally to all doctors. It is important that the strengthening of guidelines does not interfere with good medical practice and the ability of the profession to self-regulate. Whilst all medicine should be evidence based that evidence may include any or all of the following:

1. A knowledge of the pathophysiology of disease
2. Expert opinion
3. Case reports
4. Case series
5. A prospective masked clinical trial and
6. A series of prospective masked clinical trials. Provided there is some level of evidence the regulations/guidelines should not interfere with the proper implementation of new and unproven therapies.

Should you require any clarification regarding this matter, please contact RANZCO Policy Officer, [REDACTED] at [REDACTED]

Yours sincerely  
[REDACTED]

David Andrews  
RANZCO CEO