



THE AUSTRALASIAN COLLEGE OF DERMATOLOGISTS

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Executive Officer

Medical

AHPRA

GPO Box 9958

Melbourne 3001

Email: medboardconsultation@ahpra.gov.au

Dear Medical Board of Australia,

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

On behalf of the Australasian College of Dermatologists (ACD), thank you for the opportunity to provide feedback on the *Public consultation on complementary and unconventional medicine and emerging treatments*. We welcome the move towards clearer regulation in the application of such medicines and treatments to ensure patient safety, quality of care and professional integrity of all medical practitioners registered by the Board.

The ACD is the peak medical college accredited by the Australian Medical Council for the training and professional development of medical practitioners in the speciality of Dermatology. The ACD has a national membership of approximately 500 practising specialist dermatologists and 100 trainees across Australia.

We are supportive of strengthening current guidance (option two) to address the issues identified in the consultation paper with respect to complementary and unconventional medicine and emerging treatments. The current regulation inadequately addresses the issues identified in the consultation paper and to protect patients. We welcome the distinction between medical practitioners with *patients who use* complementary and unconventional medicine and/or emerging treatments but don't themselves provide these treatments; and *medical practitioners who do provide those treatments* in the draft guidelines. It's a critical distinction, particularly when patients are seeking medical advice through non-conventional pathways.

The proposed term and definition of 'complementary and unconventional medicine and emerging treatments' are broad. The Board needs to be mindful of the risks associated with such a broad encompassing definition of such terms and how the Board intends to monitor compliance and efficacy of the guidelines. Further while the Board's regulatory power is focused on ensuring registered medical practitioners are compliant, it does not fundamentally address how best to safeguard and educate patients. This is particularly applicable when patients seek out complementary and unconventional medicine and emerging treatments through non-registered healthcare professionals. Whilst ensuring patient choice is respected, there is a strong need to safeguard patients and improve health literacy, and this issue is not sufficiently addressed by the draft guidelines.

Our question for the Board is whether there is scope to further address the remaining concerns that are not dealt with directly in the guidelines. This is especially pertinent in the areas of practice identified in the consultation paper on page 8 – 9. Several of these relate to cosmetic

treatments of unproven benefit, or where randomised trials have proven there is no significant difference in treatment. This was recently shown with Platelet Rich Plasma (PRP) where “mean photo aging scores rated by 2 dermatologists showed there was no significant difference between PRP and normal saline for fine lines, mottled pigmentation, skin roughness and skin sallowness”¹.

Given that the cosmetic and anti-aging market is growing at a rapid rate, it is of utmost importance to the College that patient safety remains at the forefront and that unscrupulous medical providers are kept in check. Conversely, patient access to new and emerging treatments of potential clinical benefit must not be blocked if patients are deemed eligible and likely to respond by their treating practitioner. In this regard, the MBA is commended for the development of guidelines that account for the range of likely clinical scenarios with patient safety at the centre.

Thank you for the opportunity to make this submission. Please contact [REDACTED], Policy Manager [REDACTED] for further correspondence on this matter.

Kind regards,

[REDACTED]

Dr David Francis MBBS FACD
President
The Australasian College of Dermatologists

¹ Alam M, Hughart R, Champlain A, et al. Effect of Platelet-Rich Plasma Injection for Rejuvenation of Photoaged Facial Skin: A Randomized Clinical Trial. *JAMA Dermatol.* 2018;154(12):1447–1452. doi:10.1001/jamadermatol.2018.3977