



The Hon Mark Butler MP
Parliamentary Secretary for Health

Friday, 30 July 2010

Dear Mr Butler

Re: Position Paper on the Promotion of Therapeutic Products

The Complementary Healthcare Council of Australia (CHC) supports self-regulation of industry conduct, including for promotional activities undertaken by therapeutic goods companies. We also agree that industry should strengthen and standardise self-regulation through developing an industry framework for universal adherence to consistent industry-wide codes based on a common set of high level principles. The CHC was very disappointed to have been excluded from the Working Group established by the Parliamentary Secretary to address this very issue.

The CHC has in place a Code of Practice for Marketing of Complementary Medicines and has commenced the process of establishing its Code for Promotion of Practitioner Medicines, unfortunately it will not be in a position to be required to adopt the same high level principles as the rest of the Therapeutic Goods Industry. The paper calls for consistent arrangements across industry and goes on to state that legislative options consistent with the Government's policy objectives, including universal coverage and consistency across the sector, could be put in place in 2012 if this does not occur and yet excludes the complementary medicines sector.

The Position Paper excludes 'low-risk' complementary medicines yet makes no position on registered complementary medicines - these are currently considered to be high-risk – and there are several on the Australian Register of Therapeutic Goods.

Whilst we agree that low-risk medicines (and devices) should rightfully be excluded, in your letter (in regards to the proposed process), you informed us that an ad hoc working group would be established and encouraged us to work with the other industry associations, which is our preferred consultative and proactive style.

I spoke to Anne Trimmer in regards to participating in the working group but I was informed that we were not being invited to attend, although an offer to keep us informed was extended. Whilst appreciated, this to be inappropriate. I also contacted your office in regards to this issue, but have not yet had a response.

We are sure you will understand that the Complementary Medicine industry can not be bound by a set of principles developed through a process from which it was intentionally excluded. For our members to be required to comply with another organisation's code of Practice is inappropriate:

“We agree with the principles proposed in this position paper but as a Sponsor of Complementary Medicines we would want to comply with the CHC Code of Conduct regarding the promotion of our complementary medicines.”

It would be greatly appreciated by the Complementary Medicines Industry for this exclusion to be reversed to enable the Complementary Medicines Industry to be in a position to adopt these principles, once developed.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Wendy Morrow', with a stylized flourish at the end.

Wendy Morrow
Executive Director