



Secretariat
National Coordinating Committee on Therapeutic Goods (NCCTG)
c/- Therapeutic Goods Administration
PO Box 100
WODEN ACT 2606

30 July 2010

Dear Secretariat

CHC Submission – Seeking Information from Compounding Pharmacies

Thank you for the opportunity for the complementary healthcare industry to provide comment on the finalisation of the NCCTG's proposals for extemporaneously compounding prepared medicines in non-hospital pharmacies, dated June 2010.

The Complementary Healthcare Council (CHC) is the leading expert association exclusively committed to a vital and sustainable healthcare products industry. The CHC is unique in representing all stakeholder groups in the complementary healthcare industry; our members include importers, exporters, raw material suppliers, manufacturers, wholesalers, distributors, retailers, practitioners, consultants, direct marketers, multi-level marketers and consumers. The CHC is the principal reference point for members, government, the media, and consumers to communicate about issues relating to the complementary healthcare industry.

The CHC previously provided a response in April 2008 on the *Discussion Paper on Regulation of Extemporaneously Prepared Medicines in Non-Hospital Pharmacies* and acknowledges that this call for information invites non-hospital pharmacies to provide statistical data on the number of medicine units compounded per month. While the CHC does not hold the statistical data that has been requested, as the leading association for the complementary healthcare industry, we would like to provide the following comments.

The CHC strongly supports the NCCTG's decision not to progress previous recommendations which would have limited the range of active ingredients used in compounding, require prior approval of compounded medicines, and would have differentiated 'Class 1' from 'Class 2' pharmacies. Further, the CHC does not support any provisions which will be established for pharmacies, which may inadvertently capture compounding of complementary medicine ingredients by healthcare practitioners.

The CHC would welcome the opportunity to discuss any matters relating to this submission and if you require further information please do not hesitate to contact me.

Yours sincerely

Dr Wendy Morrow
Executive Director