

Organisation or Individual: Complementary Healthcare Council of Australia (CHC)

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Summary

The CHC strongly believes that in relation to the scheduling arrangements for medicines and poisons and at the Secretary's discretion to seek advice from advisory committees the Secretary have regard to recommendations or advice of the Therapeutic Goods Administrations Advisory Committee on Complementary Medicines (ACCM). Advice or recommendation from ACCM should be sought specifically in relation to herbal materials to be used in medicines, including but not limited to; Traditional Chinese Medicines (TCM), Ayurvedic, Australian Indigenous medicines and any other medicinal substance referred to as 'complementary medicines' and regulated as such under the *Therapeutic Goods Act 1989*. The CHC considers it imperative that the Secretary receive specialist advice from this statutory committee in relation to complementary medicines including the botanical species and considerations around the traditional medicine paradigm that the materials are to be used.

The Complementary Healthcare Council

The Complementary Healthcare Council (CHC) is the peak industry body in Australia for the Complementary Medicines (CM) Industry, our members represent the entire industry supply chain including; manufacturers, importers, exporters, raw material suppliers, wholesalers, distributors and retailers. The CHC is committed to a high growth and sustainable CM industry. Uniquely placed as the voice of both Industry and consumers we promote industry advancement whilst ensuring consumers have access to CMs of the highest quality, contributing to improved population health outcomes. We are the principal reference point for our members, government, media and consumers to communicate about issues relating to the CM industry.

Complementary medicines and natural healthcare products are vitamins, mineral and nutritional supplements, special purpose foods, herbal and homeopathic medicines, aromatherapy products, and natural cosmetics using herbals and botanicals. Complementary medicines comprise traditional medicines, including Traditional Chinese Medicines, Ayurvedic, and Australian Indigenous medicines. Complementary medicines are generally available for self selection by consumers and can be obtained from retail outlets such as pharmacies, supermarkets and health food stores. The majority of complementary medicines are indicated for the relief of symptoms of minor, self-limiting conditions, maintaining health and wellbeing, or the promotion or enhancement of health¹.

General Comments on the Review

The CHC recommends the Secretary should receive specialist advice in relation to complementary medicines in addition to the advice and recommendations by the Advisory Committee on Medicines Scheduling (ACMS) and the Advisory Committee on Chemicals Scheduling (ACCS) as part of the process for obtaining independent expert advice regarding complementary medicines that may be considered for scheduling. The ACCM offer a wealth of expertise on matters relating to the inclusion, variation and retention of complementary medicines in the Australian Register of Therapeutic Goods (ARTG) or any other matters referred to it by the TGA/DoHA.

The CHC provides submissions when public notices are made in relation to proposed amendments to complementary medicine substances in the Poisons Standard and notification of these public notices should continue to be done via the TGA website. We note that public submissions on the interim decision notice can only be provided by people who provided submissions on the pre-meeting notice. The CHC considers that, where appropriate justification can be provided, peak industry bodies should be able to provide a submission during the interim decision notice stage.

¹ Source TGA, <http://www.tga.gov.au/industry/cm-basics-regulation-overview.htm>