



CHC Submission - The Australian Regulatory Guidelines for Complementary Medicines (ARGCM) Part A: General Guidance

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Introduction

Thank you for the opportunity for the complementary medicines industry, through the Complementary Healthcare Council of Australia (the CHC), to provide comment on the consultation draft: *Australian Regulatory Guidelines for Complementary Medicines (ARGCM) Part A: General Guidance*, version 5, September 2012.

The CHC, in general, supports the restructure of the ARGCM from parts 1,2,3,4 & 5 to parts A,B,C & D (with attachments) to increase the useability of the guidelines and to ensure the information provided is reflective of current regulatory requirements. The CHC notes that further, more comprehensive reviews of the ARGCM are expected in 2013 to reflect changes through progression of reforms, including changes to the Electronic Lodgement Facility. Therefore, the CHC provides comment in relation to the useability and restructure only of Part A of the Guideline.

With the suite of complementary medicine reforms underway, it will be essential to review the individual sections of the ARGCM again, in consultation with industry, particularly when the evidence requirements for listed complementary medicines and the coded indications project have progressed through consultation.

The CHC provides detailed comment to Part A of the ARGCM at attachment 1. The CHC has also taken this opportunity to comment specifically in relation to the updates to the TGO 78-Standard for tablets and capsules and the regulatory framework for homoeopathic medicines.

The CHC thanks you again for the opportunity to make this submission. The CHC will continue to work proactively with the TGA to enhance the complementary medicines regulatory framework.