

As a Chinese medicine practitioner, registered herbalist and acupuncturist in Australia, it greatly disappointed me that when registration came into effect in 2012, there was no provision for practitioners to be able to use Chinese herbal medicines that have been listed as scheduled substances.

There are several substances that Chinese herbal practitioners globally, can and do use to good effect, such as Fuzi which falls under Schedule 2 (ACONITUM) and MaHuang, falls under schedule 4 (EPHEDRA) and Xixin, falling into schedule 10 (ASARUM).

Perhaps you are not aware how Chinese herbalists use these herbs in countries where some to all of them are freely available, such as the USA and PRC and parts of Europe. A Chinese herbalist would never give one of these herbs by itself to a patient. Chinese herbal medicines are always dispensed in a formula. This changes the nature of the substance received into the body from the properties of using a single herb into the body. There are other methods used to address the properties of herbs like processing, boiling as a decoction. Often with Fuzi for instance it is boiled longer than other herbs as part of the correct administration of the therapeutic agents within it.

I understand it's the TGA's job to protect public safety and when these herbs were listed as scheduled substances there was no registration of Chinese medicine in Australia. Anyone could say they were a herbalist, set up their business and start practicing in Australia with no training whatsoever. Now that is not the case, there is a government sanctioned standard of practice, and training through AHPRA.

Since practitioners in Australia have not been able to use these herbs for some time, and some new practitioners not at all, it would be easy to create even an additional requirement for registered herbalist practitioners to undergo training in the use of scheduled substances once the TGA approves their use for registered Chinese herbalists with the condition they undergo mandatory scheduled substance use training.

This course /training could be formulated by the AHPRA CM Board in consultation with industry associations /TGA etc.

In conclusion, I feel Australians are missing out on health benefits from the use of these herbs, particularly Fuzi is a herb where there is no substitute available for its functions. In the hands of untrained professionals and laypeople, yes it can be dangerous or potential for misuse (for instance Ephedra), but in the hands of registered Chinese herbalists, using these herbs as part of a multi-herb containing formula, with the proper administration, the benefit far outweighs the risk to the public.