



28 March 2017

Complementary Medicines Reform Section
Complementary and OTC Medicines Branch
Therapeutic Goods Administration
PO Box 100
WODEN ACT 2606

via online consultation form

MOVE muscle, bone & joint health welcomes the opportunity to contribute to the reforms to the regulatory framework for complementary medicines.

MOVE supports improving the quality of information available to assist consumers to make informed choices about using complementary therapies. We welcome the proposed steps to improve transparency regarding the evidence of effectiveness and the associated claims that can be made.

We support a wide range of therapies being available in the Australian market to further facilitate consumer choice. The lack of evidence for some complementary therapies should not automatically lead to an assumption that those therapies cannot provide benefit to some people. However, false representations can cause harm to the consumer and to the community.

MOVE has recently undertaken a systematic review [Understanding the needs of consumers with musculoskeletal conditions: Consumers' perceived needs of health information, health services and other non-medical services: A systematic scoping review](#), which was conducted by Prof Wluka and colleagues.ⁱ

This systematic review found that consumers 'desired high quality, accurate information with simple explanations' (p.1). The review also found that complementary medicines were widely used.

The use of complementary medicines in conjunction with pharmaceutical compounds is very common for muscle, bone and joint conditions.¹ Further, many people using complementary medicines do not discuss this with their doctors. Sabanovic et al found that people with chronic pain often used a combination of prescribed, off the shelf and complementary medications to manage their pain.ⁱⁱ

Many people do not have a strong understanding of their medicines and want information about alternatives available to manage their pain.^{iii iv v} Providing more useful information for complementary medicines should help address this issue.

MOVE is the voice of muscle, bone and joint health; conditions that affect over 6.8 million Australians. We provide the voice, supported solutions and a knowledge hub to improve the quality of life of people who have, or are at risk of developing, muscle, bone and joint conditions.

¹ There are eight studies about willingness to try complementary therapies and seven about perceived benefit and satisfaction cited in Wluka et al 2016; and further reports from patients are available in Sabanovic et al 2016.

Our work is actively supported by people with arthritis, osteoporosis, back pain and other muscle, bone and joint conditions, as well as our members, volunteers, health professionals, peer support groups, corporate and research partners.

We work collaboratively to deliver evidence-based research, education, information, advocacy and support services.

MOVE muscle, bone & joint health would be happy to expand on the issues raised in this submission. If you have any queries, please do not hesitate to contact me by email ben.harris@move.org.au, telephone 1800 263 265 [REDACTED] [REDACTED]

Yours sincerely



Ben Harris
General Manager, Policy Information and Programs

ⁱ Wluka A, Chou L, Briggs A, Cicuttini F 2016, *Understanding the needs of consumers with musculoskeletal conditions: Consumers' perceived needs of health information, health services and other non-medical services: A systematic scoping review*, *MOVE muscle, bone and joint health*, Melbourne. Available at <http://www.move.org.au/Research/Funded-Research/Completed/Needs-of-Consumers>.

ⁱⁱ Sabanovic H, Harris B, Clavisi O, Bywaters L 2016 'Attitudes towards opioids among patients prescribed medication in Victoria', *MOVE muscle, bone & joint health*, Melbourne. Available at <http://www.move.org.au/Research/Opioid-Study>.

ⁱⁱⁱ Schers H, Wensing M, Hujimans Z, van Tulder M, Grol R 2001, 'Implementation barriers for general practice guidelines on lower back pain a qualitative study' *Spine* 26: E348-E353.

^{iv} Jinks C, Ong B, Richardson J 2007, 'A mixed methods study to investigate needs assessment for knee pain and disability: population and individual perspectives' *BMC Musculoskeletal Disorders* 8: 1-9.

^v Baumann M, Euller-Ziegler L, Guillemin F 2007, 'Evaluation of the expectations osteoarthritis patients have concerning healthcare, and their implications for practitioners' *Clinical and Experimental Rheumatology* 25: 404-409.