



Chinese Medicine Industry Council of Australia Ltd

澳大利亞中藥行業聯合會

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Ms Debra Gillick
Executive Officer
Chinese Medicine Board of Australia (CMBA)
AHPRA
Canberra
ACT

Email: chinesemedicineconsultation@ahpra.gov.au

RE: Submission on the Mandatory Registration Standards and the Grandparenting Arrangements

Dear Ms Gillick,

On behalf of the Chinese Medicine Industry Council of Australia Ltd (CMIC), it is my pleasure to respond to your kind invitation for a submission on the Draft Mandatory Registration Standards and the proposed Grandparenting Arrangements.

CMIC was established with the aim of playing the role as representative of the Australian Chinese herbal medicine industry in order to foster effective communication between this industry and the relevant government departments. CMIC supports the regulatory framework approach to ensure that our Five-principles and values be upheld – That is “Quality, Safety, Efficacy, Availability and Affordability”.

We are pleased to note that the draft mandatory registration standards are well proposed, thoughtfully designed, quite complete and generally well balanced. While it places the public interest as the first priority, the current practices, history as well as the interests of government and industry are also given due consideration. However, as the professional body that focuses on the supply of Chinese medicines together with the largest membership of Chinese herbal dispensers in Australia, we wish to express our opinions from the perspective of our profession as below:

1. Continuing Professional Development (CPD) and Guidelines
 - 1.1 The CMIC agrees and supports the 20 hours annual minimum requirement in continuing professional development to ensure that both theoretical knowledge and professional skills are maintained and enhanced.
 - 1.2 We believe that it is appropriate that four out of this twenty hours should be

related to professional issues, otherwise the quality of continuing practice may possibly be compromised. We suggest CMBA could standardize the CPD form from where the recommended activities under the defined Professional Issues could be listed as a guide.

- 1.3 Given the fact that the membership for Chinese Herbal Dispensers in the industry is a newly launched category, we suggest that the calculation for the Pro rata arrangement for the first time registrants of Chinese Herbal Dispensers by 1 July 2012 are to be based on only 10 hours annually for the first year ended on 30 June 2013.
 - 1.4 The CMIC agrees with the requirement that for the endorsed practitioners and dispensers a minimum numbers of hours must be related to scheduled herbs. However, whatever this number is, it should be counted as part of CPD to be included in the standard CPD card.
 - 1.5 If the further education or training is for remedial purpose for specific individuals, these should not be counted as CPD.
 - 1.6 We agree with the exemptions arrangement.
2. Criminal history registration standard
We fully agree with and support the standard.
3. English Languages Skills Registration Standard
 - 3.1 Given the uniqueness of Chinese medicine, the knowledge, experience, treating skills and outcomes are primarily important. We believe overall language requirement for post-parenting registration at IELTS 6.5 with minimum 6.0 of each band or its equivalent is appropriate at the current stage. The Board may review and amend the entry language requirement some years later when there is convincing evidence in favor of a higher requirement.
 - 3.2 We strongly support the Exemptions Arrangement for Grandparented applicants till 31 December 2015.
 - 3.3 We agree with the requirement for the effective communication applicable to all practitioners and ensure “appropriate arrangements” are in place when treating English-speaking patients as well as any other patients with whom they do not share a common language. This should be a general requirement for all practitioners, not only those of grandparented registrants.
4. Professional Indemnity Insurance (PII) arrangements and standard
 - 4.1 The CMIC generally agrees with the proposed registration standard in relation to the Professional Indemnity Insurance.
 - 4.2 The current situation is that most of the existing Chinese Herbal Dispensers in a retail shop are NOT covered by PII, but intend to be covered under Public and Product Liability. Given the different profession involved, history record and the lower risks compared with the other two divisions, we suggest for those who are registered as a Chinese Herbal Dispenser only need to meet a minimum of \$1 million cover requirement.
 - 4.3 The CMIC strongly recommends that the CMBA should work out further detailed guidelines with the Insurance Providers Industry in relation to the PII for Chinese Herbal Dispensers.
5. Recency of Practice Registration Standard
The CMIC agrees with the proposed registration standard in relation to “Recency of Practice”.

6. Grandparenting Registration Standard

The CMIC agrees with and supports the proposed Grandparenting registration standard and arrangements in general. In addition, we wish to add in the following proposals for your consideration:

Since the “membership of professional association relevant to the specific area of practice” is proposed as one of the Practice Evidence for Acupuncture and Chinese herbal medicine in Schedule 1, the CMIC suggests and requests that under “Evidence of Practice of Chinese Herbal Dispensing” of Schedule 1, the Type of Evidence should be added with one more type as below:

Membership of a professional association specified as Chinese Herbal Dispenser

This may ensure those professional associations with members in the Chinese Herbal Dispensers not being disadvantaged nor discriminated.

In conclusion, the CMIC supports the draft registration standard as a basic framework and starting point. Suggestions or options where relevant and necessary, such as those given above, should be given due consideration and incorporated into the legislation where appropriate.

Yours sincerely



Max Ma, JP
President of CMIC