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As a current practitioner of acupuncture and chinese herbal medicine, I am very concerned of the draft standards leading to unfair restriction of trade to;

- Older and more experienced practitioners due to the time of their initial education
- Practitioners in states of Australia who do not have the education facilities (publicly funded) of Sydney and Melbourne (all public University courses are only offered in these two cities)
- Australian-trained practitioners applying for registration under the national scheme are put to a higher grandparenting standard than applied under the Victorian scheme

I strongly suggest that the least stress and financial cost be placed on practitioners and the registration authority by allowing;

- All government/university-accredited qualifications at least three years full-time equivalent duration should be included on the list of courses deemed adequate for grandparenting, and that this include the past advanced diploma and diploma level programs;
- Unaccredited programs that were recognised by AACMA as meeting the requirements for practice at that time should also be included on the list of courses deemed adequate for grandparenting, and that this include the past practitioner diploma and unaccredited bachelor programs;
- The list submitted by the AACMA of Australian Chinese medicine programs deemed adequate for grandparenting purposes should be included on the CMBA list of courses deemed adequate for grandparenting purposes.

There are many styles of acupuncture developed out of chinese medicine (Japanese, Korean) that need to be recognised and are recognised by other western countries such as USA. We need to recognise these various styles.

Professional associations such as AACMA have very high standards, it costs a lot of money and time to maintain their standards as a member, such memberships should be a prerequisite for acceptance as registration as

these associations have policed the profession before legislation was ever considered.

Herbal medicine should be established at 2 levels

1) Loose herbs which require more experience than 2 below

2) Patient herbs (prepackaged) these formula have been a long established tradition in chinese herbal medicine because they have proven to work

Please consider these points I have raised as a current older working practitioner

Regards

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