

The Medical Board of Australia Threat to Integrative Medicine by Dr Mark Donahoe and Professor Stephen Myers

30 March 2019: In February this year, the Medical Board of Australia launched a public consultation paper proposing “clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments.”

The document appeared on the website without warning or prior consultation with any of the medical colleges, representative bodies or academics in the fields of Integrative Medicine. The Board wrote that it was proposing the new changes in regulation because of “concerns of stakeholders” specifically about complementary and alternative medicine, without identifying the stakeholders or the concerns raised.

The initial deadline of 12 April for public feedback was extended after a meeting between the Australasian Integrative Medicine Association (AIMA) and the Medical Board, in which AIMA expressed its concerns about the proposed guidelines. Subsequently, AIMA has written to the Medical Board requesting an immediate retraction of the document and removal from the public feedback process.

The document, which is available on the Medical Board of Australia website (www.medicalboard.gov.au), is a poorly thought out mishmash of definitions, risks and concerns. They proposed to sanction doctors who use safe and effective Integrative Medicine in their day-to-day medical practice by imposing a new set of guidelines on their practice. This would in effect create a two tier medical system, with different guidelines for ‘conventional doctors’ and ‘integrative doctors’. The first step, in any form of political bullying, is to create a division where none should exist. Doctors involved in Integrative Medicine consider there should be only ONE set of good practice guidelines that ALL doctors should follow.

Integrative medical doctors combine the best of conventional and complementary medicine into clinical practice to do preventive medicine, manage complex illness, and care for patients for whom conventional medicine has failed or even harmed.

The MBA regulations group “complementary and unconventional medicine and emerging therapies” into a single definition. This is unreasonable and unjustifiable within a scientific framework. Such a definition has a political motive to separate the perceived good doctors who follow conventional medicine from the bad doctors that question the boundaries of conventional medicine. Doctors who practice complementary medicine within Integrative Medicine have nothing in common with “unconventional medicine” or “emerging therapies”. It is estimated that one third of Australian GPs utilise some aspects of complementary medicine within their medical practice, so it could even be argued that this is current conventional medicine.

Integrative Medicine is arguably the safest type of Medicine, and the only way to make a case that it needs additional regulation is by linking it with unsafe practices.

Integrative Medicine doctors are educated beyond the usual general practice training to address prevention, chronic degenerative diseases, nutritional and lifestyle-related illness and disability. These are the conditions that take time that the average doctor does not have readily available, leaving many patients unsatisfied and inadequately treated within conventional 10-minute medicine. Integrative Medicine doctors have an important role in the community of managing such conditions using safe and effective complementary medicine approaches when conventional medicine is unable to help.

The main concerns about the proposed regulations were that the Board had:

- Created unnecessary guidelines, as the current Code of Practice already addresses all safety and efficacy issues related to Integrative Medicine. This was a waste of taxpayer money;
- Breached its own COAG Principles in creating the document, including restriction of consumer choice of their own doctor outside “conventional” medical practice;
- Failed to consult with the Integrative Medicine community in the planning and development of the regulations, leading to a lack of procedural fairness;
- Failed to identify any significant concerns about the safety of Integrative Medicine or any risk to the public; and
- Linked Integrative Medicine, at the lowest end of risk to patients, with high risk experimental interventions in a single flawed group definition.

If these regulations go through, doctors practising safe and effective Integrative Medicine may find themselves breaching the regulations, and subject to disciplinary action from the Board’s regulatory branch, AHPRA, including deregistration.

The proposed regulations could make it unsafe for any doctor in Australia to practise outside the mainstream of “conventional medicine”, limiting the choices of nearly a third of Australians who choose Integrative Medicine as their preferred healthcare.

Let the Medical Board of Australia know that this is not acceptable and how it would impact you, your family and your choice of healthcare provider. Only by feedback from the public will these regulations be withdrawn. Find out more at www.integrativemedicinefreedomofchoice.com.

We urge you to go to the Medical Board of Australia website (www.medicalboard.gov.au), download and read the document, and give your feedback to the Board before the **30 June deadline**.