

15 August 2012

Mary-Louise Hannah  
Workforce Intelligence and Planning  
Health Workforce New Zealand  
National Health Board  
Ministry of Health  
PO Box 5013  
WELLINGTON 6145

Dear Mary-Louise

**Proposal that Traditional Chinese Medicine Become a Regulated Profession under the Health Practitioners Competence Assurance Act 2003**

Thank you for the opportunity to comment on this proposal.

The principal grounds for regulation in our view must be public safety. The public must have protection in respect of services provided by health practitioners. On this basis we support the regulation of practitioners of traditional Chinese medicine, although we note that in general the level of harm to be protected against is low.

We are however, reluctant to see traditional Chinese medicine practitioners regulated under the HPCA Act as the end result is likely to give these practitioners and the products and services they provide legitimacy and credence that they otherwise would not have had

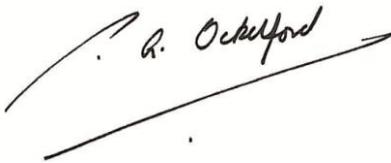
We have always held the view that before an alleged therapeutic product or service is provided its efficacy should be proven by properly verifiable scientific methodology (such as double blind trials etc). Regrettably much of the complementary or alternative medicines offered (such as traditional Chinese medicine) have not been subjected to these standards of evidence.

We note that the government has in the past raised concern about the proliferation of regulatory authorities being created for new health professions seeking registration and regulation under the HPCA Act 2003. In response to this concern the NZMA suggested the possibility of a two tier system of regulation, the first being the current system to cover those professions where there is potential for significant harm and the second being a lesser licensing system that covered those professions where there was the potential for some harm but at a far lower level. We **attach** a copy of our original submission on this for your information.

In our view, regulating the practice of traditional Chinese medicine under a second tier licensing system would resolve the following issues:

- It would avoid further proliferation of authorities
- It would protect the public from harm without also fostering an interpretation by the public that traditional Chinese medicine is supported by the government as meeting the same standards of efficacy as other health professions which do subject themselves to properly verifiable scientific methodology.

Yours sincerely

A handwritten signature in black ink, reading "Dr. Ockelford". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Dr Paul Ockelford  
Chair, NZMA