

DISPENSING NATURAL MEDICINE AND NUTRITIONAL SUPPLEMENTS.

The application of nutritional and herbal medicine to assist with disease states is an area for robust discussion between health professionals and between health professionals and the consumer. Many are not aware of the intricacy of the industry and this article is meant to bring information to enable health professionals and the consumer to make decisions based on fact rather than hearsay or bias.

Concentrated supplemental foods and herbal medicines come in various forms. They are made as tablets, capsules, powders, or liquids to suit your lifestyle, needs and budget. Supplements manufactured as tablets or capsules to a medicinal or nutritive formula will display an “Aust L” number indicating TGA (Therapeutic Goods Administration) approval. All supplements with this identification are made to pharmaceutical grade standard guaranteeing purity and quantity and inclusion of all ingredients listed. Some supplements from the USA and some other countries that are not regulated as we are, may not contain ingredients as listed on the label. Australia is among the most highly regulated in the world for the manufacture or importation, and subsequent sale of nutritional supplements and herbal medicines which may be referred to as “complementary medicine”. It may be confusing for those who are seeking natural health supplements for the first time whether it is from the health food store, pharmacy, or from a natural health (complementary medicine) practitioner. The “Aust L” number is a guarantee of purity of ingredients listed on label and will be in the bottle.

Concentrated foods such as wheat or barley grass, spirulina, chlorella, protein powders derived from dairy or plant source, mixes of green or red powders with herbs and minerals, if not encapsulated or tableted may be marketed as a “food” and may not be scrutinized by the TGA. Be aware that imported powdered concentrated foods, if not marketed under a reputable label may have come from a country that has no food inspection regulations. Barcode check for goods made in China will be helpful: 690, 691 through to 695, also Thailand (885) and Vietnam (893). However, this can be deceptive also. Imported powders by Australian companies may be listed with an Australian barcode with ingredients listed as coming from imported and local ingredients without reference to the source of the imported ingredient(s).

Supplement manufacture in Australia covers two aspects to natural health care:

1. Manufactured for general retail distribution.
2. Manufactured for prescription by an accredited health professional as per the TGA guidelines. See article “Professional Natural Health Industry Associations – TGA Recognised Healthcare Practitioners”.

1. Supplements available on retail shelves for self-selection.

As per the CHC report, the availability of vitamins and minerals, herbs and homeopathic is extensive in Australia and of the best quality. Supplements and concentrated or super foods for self-selection can now be found in supermarkets and pharmacy as well as the traditional area of health food stores. Some training is provided by the supplying companies for staff who may be accessed for advice on what to take for a specific health problem and also about the quality of the brands. Health food store staff is generally more experienced, and it is worthwhile to ask if a qualified naturopath is available. However, the onus is on the consumer to make a selection. It is comforting to know that the record of adverse reaction of death by vitamin ingestion is nil. However, some people will take too much supplementation and/or do not select the optimum remedy for them.

2. Supplements prescribed by TGA Healthcare Accredited Practitioners:

There are many companies which manufacture isolated nutrients and herbal medicines for use by practitioners because of the efficacy for specific disease states. These natural medicines will be labelled with the wording "For Practitioner Dispensing Only". Isolated nutrients, whether in the form of vitamins, minerals, herbs or amino acids need to be correctly prescribed after proper consultation where symptoms are recorded, tests are completed, and foods ingested known to the practitioner. Treatment plans are formulated, and the client is expected to proceed with the treatment ongoing. The prescribed supplements are to be detailed with dosage on written prescription and/or labelled accordingly. These supplements and herbal medicines are to be kept away from self-selection and out of view of the general public. Conditions of sale of these medicines are to be by script, or repeat script, or by recommendation of the attending naturopath. They are to be treated similar to an S3 prescription drug. Presentation of a valid script at any clinic, by a practitioner not of that clinic, may be filled by attending staff with confirmation check by a suitably qualified person e.g., naturopath, pharmacist.

Protocol for supply and sale of "Practitioner Only" (PO) Natural Medicine in retail environment: Health food stores and pharmacy.

Practitioner Only Products: General Information – ex CHC Guideline for Sale & Supply of PO Product Dec. 2011 p 5 – 3.1

Supply of therapeutic Goods to/by Complementary Healthcare Professionals.

PO products are only to be supplied to and dispensed by a healthcare professional as described in section 42AA of the Therapeutic Goods Act 1989.

TGA Recognised Healthcare Practitioners: TGA Australian Regulatory Guidelines for Complementary Medicines, Part IV, Section 5 – Practitioner Products V4.2. August 2011 P21 – 5.3 referencing Section 42AA (1)(c) of the Act.

1. Medical practitioners, psychologists, dentists, pharmacists, optometrists, chiropractors, physiotherapists, nurses, midwives, dental hygienists, dental prosthesis's, dental therapists, osteopaths

2. Herbalists, homoeopathic practitioners, naturopaths, nutritionists, Practitioners of traditional Chinese medicine, podiatrists registered under a law of a State or Territory.

Section 5.3.1: Purpose statements on "For Practitioner Dispensing Only" Product labels.

Dispensing pack is defined in TG069 as follows: "In relation to complementary healthcare, (dispensing pack) means a pack which is to be supplied solely to complementary healthcare practitioners for supply to a person after affixing an instruction label following a consultation with that person.

Display of Practitioner Only Products - ex CHC Guideline for the Sale & Supply of PO Products Dec.

2011 p6 item 3.3. PO products should not be accessible or visible in any retail outlet, as they are not for self-prescribing. Inappropriate display of PO only products would include positioning a PO product where it may be able to be self-selected by a consumer, such as on the shelf amongst other retail products.

PO products should not be accessible until after a consultation with a healthcare professional or upon presentation of a current script written by a healthcare professional. Supply to a customer who is not a client of the In-House Naturopath in retail business and has no script. Many people are not aware that taking an herbal medicine or nutrient intense product ongoing for years is not in the best interest of their health even though the item may have been originally prescribed by a naturopath or doctor. Redirection of those who ask for a PO product to their practitioner or contact the person's practitioner for permission to dispense a repeat of the product is required.

Other options

> Refer to on duty Naturopath to consult with customer.

> Refer customer to Pharmacist.

Supply to a client of a private Naturopathic clinic.

The script may be filled by stock held by the practitioner or the practitioner may need to send the client to purchase the item elsewhere. Script for PO products or herbal medicines is to contain the following information.

> Practitioner name

>qualification

>address of clinic including contact number.

> Provider number and professional association.

Advertising and Marketing of PO products on the Net or news media of any kind:

Refer to the document:

“CHC Guidelines for Sale and Supply of Practitioner Only Products Dec 2011.”

This document details in full all requirements for promotion of PO products and all complementary medicines.

There are strict guidelines re advertising as no therapeutic claims can be made unless substantiated.