



**COMPLEMENTARY MEDICINES AUSTRALIA
2019-20 PRE-BUDGET SUBMISSION**



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Introduction



As the leading voice for the industry, Complementary Medicines Australia (CMA) has successfully driven the regulatory reform agenda. Last year saw the introduction of a refreshed therapeutic goods regulatory regime that included the establishment of a novel intermediate pathway for listing complementary medicines. A pathway that will stimulate investment in research and encourage new innovative medicines to the Australian population. We have seen years of major reviews to the pillars of our world class regulatory framework and now is a time for policy stability and certainty for business.

The sector is well-established, having evolved over the last 30 years to become a world-class industry that supports research, employment and high-skilled manufacturing. High demand for complementary medicine products is driving steady growth, with the industry reaching \$4.9 billion in revenues in 2017. Over the last five years, the sector has achieved \$2 billion in growth, predominantly as a result of strong exports. Australian brands are recognised and trusted internationally, with China importing more complementary medicines from Australia than nearly anywhere else in the world.ⁱ

Health is an indispensable prerequisite for the overall well-being of people as well as the foundation of economic and social development. Doing more to stay healthy will be key to coping with the human and financial costs of chronic and preventable illness. The 2019-20 Budget provides the Government with the perfect opportunity to reveal its preventative health reform vision for a more sustainable health system for Australia.

This CMA Pre-Budget Submission sets out a range of recommendations that are achievable, affordable and we believe will reduce costs in health care and serve to grow the economy.

CMA is pleased to offer its recommendations regarding priorities for the 2019-20 Federal Budget.

All the best in health,



Carl Gibson
Chief Executive Officer

29 100 Jobs
supported by
CM Industry

6.0%
Annual Growth
Manufacturing
(2014-2019)

\$4.9 Billion
Industry Revenue

Exports to China
Expected to
surpass the US to
be ranked #1

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Overview

Complementary medicines are an important and culturally acceptable part of healthcare around the world, representing for many people an accessible, affordable way to actively contribute to their health.ⁱⁱ Globally, individuals are increasingly including complementary medicines within their health care options. There are many reasons for the increased uptake of these products, notably a higher priority given to living well by consumers who are embracing many forms and models of health and healing.

The Australian industry is fortunate to be recognised as a premium brand in the complementary medicines sector, stemming from strict manufacturing standards and Australia’s well-deserved reputation for a clean and well-regulated environment for food and medicines.

High demand for Australian complementary medicine products is driving steady growth, with the industry reaching \$4.9 billion in revenues in 2017. Over the last five years, the sector has achieved \$2 billion in growth and over 60 per cent of companies in the sector are engaged in exporting activities.ⁱⁱⁱ The Australian complementary medicines industry is expected to continue its positive growth trajectory, increasing exports, innovation-rich manufacturing and providing a significant contribution to the economy.

CMA has four key recommendations for the 2019-20 Federal Budget that will support investment in science and innovation in the industry:

Recommendations 1: Support the growth of our high-quality Australian exports;

Recommendation 2: Focus on preventive health to build a more sustainable health system for Australia;

Recommendation 3: Support investment in complementary medicines research and translation of evidence into clinical practice;

Recommendation 4: Review the Legislative framework of Therapeutic Goods to simplify its structure and language to achieve a more user-friendly approach and minimise business burden resulting from staggered implementation of regulatory reforms.

“Many countries now recognize the need to develop a cohesive and integrative approach to health care that allows governments, health care practitioners, and, most importantly, those who use health care services, to access T&CM in a safe, respectful, cost-efficient and effective manner.”

(WHO Traditional Medicine Strategy 2014-2023).

Supporting Growth of Australian Exports

Recommendation 1: Support further growth of our high-quality Australian complementary medicines exports

Trade with international markets is crucial for the long term prosperity of the Australian complementary medicines industry. Australian products are well recognised as a premium brand in the complementary medicines sector, thanks to our strict quality and safety manufacturing standards and Australia’s global reputation for clean, green and safe products and its trusted regulatory institutions.

With Australian products increasingly popular in overseas markets, notably across Asia and the Western Pacific region, our industry holds the ability to continue its positive growth trajectory, growing our high-skilled manufacturing sector, boosting Australian manufacturing jobs across the sector, as well as stimulating scientific evaluation and research.

The Asia-Pacific region is the largest market for complementary medicines products in the world. Given the ageing population and growth of the middle class, demand for Australia’s high quality complementary medicines is expected to remain very strong. By 2030, the Asia-Pacific region will have 3.2 billion middle class consumers. Large demand is expected in the areas of health and aged care, natural preventive care and high-quality food products.

Australia is on the verge to overtake the USA as the number one importer of complementary medicines into China. The opportunities offered by the Chinese market are extensive, with the healthfood market alone – which includes vitamins and minerals, herbal extracts and Traditional Chinese Medicine – currently valued at US\$30 billion and projected to grow by 10 per cent every year until 2025.^{iv} CMA recently welcomed the news that China will expand its free trade zones and extend the current cross-border e-commerce policy, providing a stable policy and more certainty and confidence for e-commerce rules for imported products. The Chinese Government has made health a priority, with the “Healthy China 2030” (HC 2030) vision being central to all policy making^v. It will include a focus not only on medical services for patients visiting doctors, but takes a holistic approach, including education, lifestyle, services and environment. China is encouraging and promoting the development of a diverse medical service and health industry as it tackles the challenge of an aging society.

The demand for complementary medicines is growing rapidly in China due to an increasingly health-conscious population taking a strong interest in their health and wellbeing.

“Made in Australia”

Following changes to Australian Consumer Law (ACL), including the safe harbour test of ‘substantial transformation’, the ACCC revised guidelines (2018) confirms that the majority of complementary medicines no longer qualify under the new rules to be labelled as ‘Made in’ Australia. This has flow-

on effects for the ability of business to use the green and gold Australian Made (AMAG) logo¹ and the quality assurances that this logo provides global consumers.

The Australian complementary medicines industry, supported by AusTrade, now export over \$1 billion of product to China. In 2019, we are poised to overtake the USA as the biggest importer of CMs into China. It is therefore fitting that we will be hosting this year's largest international pavilion at China's HealthPlex Expo in Shanghai. Consumers in Asia care deeply about the quality of products they purchase and are sensitivity to any perceived changes to the quality of brands they know and trust. The ability to use a consistent logo and branding in the form of the 'Made in' Australia logo offers Australian business a competitive advantage in international markets.

If complementary medicines that are manufactured and tested in Australia can no longer claim 'Made in' Australia, the result will have a significant impact on the industry. It introduces a very real risk that large manufacturing plants, central to our industry retaining its Australian identity, will move offshore in the same manner as other pharmaceutical names have. The potential cost impact of this change in policy cannot be underestimated.

CMA recognises that the role of the ACCC is to ensure compliance with the ACL and is aware that our members are working hard to ensure that their products meet the new rules for country of origin labelling. However, CMA believes that the way the new rules are currently being applied to complementary medicines is inconsistent with other industries. Using Australian GMP production of the finished medicinal product (both manufacture of the dosage form and packaging and labelling in Australia) should be the benchmark to protect our industry and support our businesses to compete in overseas markets.

The Australian complementary medicines industry asks that the Government ensures support for local manufacturers and a level of certainty for businesses, in the consistent application of Country of Origin and Australian Made provisions.

Recommendation: the Government ensures support for local manufacturers by amending section 255(3)(b) of the Competition and Consumer Regulations to acknowledge finished complementary medicinal products manufactured, packaged, and labelled in Australia as meeting the definition of 'substantially transformed' in Australia.

Trade Liberalisation

CMA strongly supports the growing number of free trade agreements to which Australia is a signatory and the growing focus on helping to address 'behind the border' issues. Continued trade liberalisation will present sizeable opportunities for the Australian complementary medicines industry as the sector is well positioned to compete for emerging opportunities.

The Indian market presents one such opportunity. Indian consumers look to natural health supplements as an element of their health care choices, as India has a long history of such usage through Ayurveda medicine. The Indian natural products market was estimated at approximately

¹ Registered certification trademark and Australia's most trusted, recognised and widely-used country of origin symbol AMCL.

US\$4 billion in 2017 and is expected to grow at 21 per cent CAGR to US\$10 billion by 2022.^{vi} A market of 1.2 billion people, India is experiencing a rise in demand for nutritional supplements amongst the upper and middle classes, resulting from a rise in lifestyle diseases and a subsequent focus on health and nutrition. Higher disposable incomes, access to information, and the strong reputation of Australian products to be high quality and 'clean and green' is facilitating a growing interest among consumers for Australian health supplements, vitamins and minerals, and sports foods.^{vii}

There are challenges that need to be overcome before the Australian complementary medicines industry can fully benefit from the opportunities offered by the Indian market. To sell off the shelves, products require pre-market approval by the Food Safety and Standards Authority of India (FSSAI). Currently, however, there are inconsistencies in interpretation and enforcement of regulations by FSSAI and by local state governments. Indian consumers trust and support local manufacturing, and local companies are able to provide very competitive prices resulting from imported health supplements attracting tariffs of 30% to 150%, depending on the product.

India presents a significant opportunity in the future for the Australian complementary medicines sector. CMA proposes that the Australian Government progress the Australia-India Comprehensive Economic Cooperation Agreement, including tariff reduction and clarification around the application of GST on health products, in order to support Australian businesses in our sector to benefit from the future market opportunities offered by India.

India also presents an opportunity for exporting Australian ingredients for high end products, as there is a demand for high quality and unique ingredients such as tea tree oil, manuka honey, whey protein concentrate etc.^{viii}

Recommendation: The Australian Government progress the Australia-India Comprehensive Economic Cooperation Agreement, including tariff reduction and clarification around the application of GST on health products.

Ingredients Grown in Australia

AgriFutures (formerly RIRDC) identifies and nurtures research, innovation and collaborative efforts to support new and emerging opportunities for rural industries. This includes support of the emerging Australian seaweed industry, tea tree oil, and native plants such as wattle seed, Kakadu plum and native pepper. A large opportunity exists to increase the market capacity for Australian grown raw materials for medicinal herbal ingredients, underpinned by Australia's 'clean and green' branding and reputation for quality. CMA proposes targeted funding for AgriFutures to work with the Australian complementary medicines industry, supporting additional research and commercialisation to fully capture the opportunity of locally grown ingredients.

Recommendation: targeted funding be provided for AgriFutures to work with the Australian complementary medicines industry, supporting research and commercialisation of locally grown ingredients.

Support Programs for Exporters

CMA believes that government support programs are vital to assist Australian exporters to conduct business in emerging and growth markets, and in terms of provision of advice, capacity building and expediting export opportunities. Maintaining Austrade as a strong organisation is vital to Australia's economy, as are the continued efforts by the Department of Foreign Affairs and Trade to support Australian firms in building strong international networks.

Austrade and DFAT's Australia-China Council have provided instrumental support for our industry in building engagement with Chinese stakeholders, a notable example being the strong presence of Australian brands at the CMA Australian Pavilion at the Healthplex expo in Shanghai, one of the premier events for companies looking to enter the Chinese market or to raise the profile of their brands. Similar support for raising brand awareness in the Indian and Indonesian market would be of great value.

Recommendations

- Ensure support for manufacturers and a level of certainty for businesses, in the consistent application of Country of Origin and Australian Made provisions.
- Progress the Australia-India Comprehensive Economic Cooperation Agreement in order to support Australian businesses in our sector to benefit from the future market opportunities offered by India.
- Targeted funding for AgriFutures to collaborate with the Australian complementary medicines industry to increase locally grown ingredients.
- Maintain current investment in Austrade to support Australian exporters and enhance Australia's global competitiveness.

Population Health Benefits

Recommendation 2: Government funding is needed for health prevention initiatives to improve the health and wellbeing of the community and create long term savings for the health budget

In general, it has to be said that Australia has one of the highest performing health systems in the world. However, in common with a number of other developed countries, we are also experiencing an ageing population and increasing rates of chronic and complex health conditions. Spending on health has grown from \$5 000 per person in 2006-07 to \$7 100 per person in 2015-16.^{ix} With half of all Australians already having at least one chronic disease, the need to place a stronger focus upon preventive health is becoming increasingly important.^{xxi} An older and sicker population can only foreshadow higher healthcare costs in the future unless there is a focus shift towards early prevention, encouraging healthy and active ageing, and supporting individuals to take control over their health.

Natural Therapies

Natural therapies are recognised by the World Health Organization and by governments around the world as effective, appropriate and cost-effective solutions to helping people manage their healthcare. Complementary medicine practitioners emphasise nutrition, lifestyle modifications, and the importance of taking personal responsibility for health as fundamental principles for improving quality of life. Research conducted in Australia demonstrated that the total number of client consultations is estimated at 16 million annually, contributing over AUD\$1.8 billion to the economy each year.^{xii}

Amid the ongoing debate over rising out-of-pocket costs across the health sector, from 1 April 2019, private health insurers will no longer be permitted to provide cover for a wide range of natural therapies, including naturopathy, herbal medicine, yoga and tai chi, all of which have a strong evidence base supporting their use to promote good health.

An analysis carried out by PricewaterhouseCoopers found that members across all levels of hospital cover who also choose ancillary benefits for natural therapies claimed \$200 per person less every year in hospital and medical costs; for members with top hospital cover it was \$430 per person less claimed if they chose ancillary benefits for natural therapies.

CMA believes that ceasing the private health rebate for natural therapies, such as herbal medicine and naturopathy is a false economy.

Recommendation: In light of the evidence supporting the use of these natural therapies for cost-effectively contributing to good health, CMA recommends that Government reconsider restoring private health rebates for natural therapies.

Complementary Medicines' Role in Preventive Health

Individuals use complementary medicines as adjunctive therapy to conventional medicine, to help manage chronic disease, prevent the exacerbation of illness, and to optimise nutrition and wellbeing. There is now robust evidence in a number of areas that complementary medicines are a cost-effective way to improve health outcomes.

The 2017 McKell Institute report *'Picking the low hanging fruit: Achieving a more equitable and sustainable healthcare system'* finds that targeted evidence-based uptake of certain complementary medicines would result in notable cost savings in Australia, whilst delivering better health outcomes and greater equity.^{xiii} Through addressing some of the social determinants of health, which includes having a poor diet, complementary medicines can play a role in addressing long-term health budget pressures.

Increased uptake of vitamin D and calcium

In Australia, between 31% and 58% of the population is found to suffer from vitamin D deficiency, despite the fortification of many foods with vitamin D.^{xiv} Vitamin D deficiency has been linked to an increased prevalence of a number of chronic diseases, including osteoporosis, diabetes and heart

disease.^{xv} The McKell Institute estimates that up to 8895 fractures annually could be avoided in Australia with increased uptake of vitamin D and calcium, saving the Government up to \$142 million in direct health costs.

Prenatal Vitamins

Folate, iodine and vitamin B3 are known to prevent neural tube defects. The National Health and Medical Research Council advise that pregnant women and those planning a pregnancy should take a daily folic acid supplement at least one month before and three months after conception, as well as eating a healthy and varied diet as recommended in the Australian Dietary Guidelines. The guidelines recommend routine supplementation of folate and iodine, with vitamin D and iron supplementation for pregnant women with identified deficiencies. Maternal malnutrition leads to adverse pregnancy outcomes and can lead to the long-term negative impact upon growth and development during childhood and increases in risk of developing chronic diseases later in life.

CMA supports the recommendation of increasing the uptake of pre-natal and pregnancy vitamins by lower income earners to help address health inequalities, estimated by the McKell Institute to cost between \$26 million and \$46 million per year, a small cost given the potential benefits to health equity and long-term savings from stemming the rise in prevalence of chronic diseases.

National Preventive Health Strategy

CMA supports the call to re-establish a National Preventive Health Agency to evaluate evidence-based interventions at a population level, an important step towards placing good health at the centre of policy making in Australia. A fundamental aim of health policy should be to prevent disease and reduce ill health so that people remain as healthy as possible for as long as possible.

Preventive health is also an essential move towards improving the cost-effectiveness of the health care system, by enhancing Australians' health and quality of life, and reducing preventable illness. In the case of complementary medicines, a thoughtful and rigorous strategy, coordinated by the preventive health body, would further demonstrate the cost-effectiveness and health benefits of complementary medicines for contributing to improved public health.

“Tackling the growing personal, social and economic burden of chronic illness is imperative, especially in a country with an ageing population. Prevention is increasingly being seen as a crucial means of reducing this burden.”

(Australia: The Healthiest Country by 2020)

Recommendations:

- Reinstating the private health rebate for natural therapies, in light of the evidence supporting the use of these natural therapies.
- Development of a strategy, in consultation with physician groups, to increase the uptake of vitamin D supplementation amongst at risk groups, and the introduction of a scheme to provide subsidised vitamins during pregnancy through health practitioners for concession card holders.
- Re-establish a national preventive health agency to implement and evaluate population-wide prevention initiatives, improving the health and wellbeing of the community and providing long-term savings for the health budget.

Encourage & Support Innovation and Investment in Research

Recommendation 3: Encourage and support innovation and investment in complementary medicines research. Australia holds a unique opportunity to build capacity in a world-leading complementary medicine research sector and to contribute to informed healthcare choices around the globe

Funding for Complementary Medicine Researchers

Australia is fortunate to be home to world-leading research institutions for complementary medicines, including the Australian Research Centre in Complementary and Integrative Medicine (ARCCIM) at the University of Technology Sydney, and the NICM Health Research Institute (NICM) at Western Sydney University.

ARCCIM is an outstanding public health and health services research centre focusing on traditional, complementary and integrative health care and brings together experts in epidemiology and health economics.

A principal complementary medicine research institute in Australia, the NICM Health Research Institute has created a broad network of significant research partnerships with international organisations, including a number of prestigious universities, hospitals and other agencies in China, Asia, Europe and the US. The NICM Health Research Institute has recently moved to the Westmead precinct, one of the largest health, education, research and training precincts in the Southern Hemisphere.

Australia also boasts excellent research centres outside of the university sector, such as the Endeavour College of Natural Health, The National Institute of Integrative Medicine (NIIM) and the Blackmores Institute. The Endeavour College of Natural Health is a leading higher education provider for complementary and integrative healthcare, in part due to the value placed upon practice-relevant research. In collaboration with universities and other medical bodies, NIIM conducts research into the safety and efficacy of integrative medicine and complementary therapies for the prevention, detection and treatment of disease and boasts Australia's largest integrative medical centre, the NIIM Clinic. The Blackmores Institute, the academic and professional arm of Blackmores Limited, was established in 2012 with a vision to improve and promote the quality use of natural medicine via a focus on research and education.

Just a few examples of recently published research include nutrition and supplementation, probiotics and internal gut health, yoga, natural pain relief methods during childbirth, and the benefits of exercise in mental health. A Cochrane Review, published in November 2018, 'Omega-3 fatty acid addition during pregnancy' showed that there's high quality evidence for omega-3 supplementation being an effective strategy for preventing preterm birth, the leading global cause of death in children under the age of 5 years. ^{xvi}

For every dollar invested in Australian health research and development, \$2.17 in health benefits is returned.^{xvii} Given the potential benefits of complementary medicines as a tool towards preventive health, complementary medicines research should be a priority area for funding.

Recommendations:

- Beyond the general need for increased funding support for public health research in Australia, CMA recommends that particular areas of research priority include targeted additional support for complementary medicine research groups.

Regulatory Framework

Recommendation 4: Minimise business burden resulting from implementation of regulatory reforms.

The Australian complementary medicines industry operates within one of the most tightly regulated systems in the world. This ensures that consumers have access to responsible, evidence-based and high quality products and the ability to make informed choices about including them within their health care options.

In Australia, the regulation of complementary medicines falls within the remit of the Therapeutic Goods Administration (TGA), which has the responsibility of regulation of all therapeutic goods, including medicines and medical devices. The TGA is committed to contributing to Australia's health system through best practice regulation of health products, and safeguarding the health of all Australians through effective, timely and risk proportionate regulation of therapeutic goods.^{xviii}

Regulatory Reforms Implementation Leading to Unnecessary Regulatory Burden

CMA would like to acknowledge the significant work that has been undertaken to date by the TGA on the Medicines and Medical Devices Regulation (MMDR) reforms.

The main objectives of the MMDR was to improve the timely and safe access to quality therapeutic goods for consumers, whilst ensuring that any legislative framework is commensurate with the risk of such goods, and to minimise the regulatory and administration burden for business. This is consistent with the need for Australia to remain competitive on the global stage. Industry cooperated with the reforms with the intent that they were de-regulatory in nature.

Whilst industry recognises that reforms create additional work for both the regulator and for businesses, an unnecessary burden is currently being created due to staggered time frames for implementation of the numerous changes to legislative instruments. This is creating a level of complexity and financial burden for industry, the significance of which, particularly for smaller and medium sized entities, cannot be overstated.

The Expert Panel reviewed our sector with a view that the Industry Innovation and Competitiveness Agenda indicated that '*a lower cost, business friendly environment with less regulation*' is critical to

achieving the outcome of maintaining global competitiveness. Rather, the TGA implementation has resulted in a significant increase in red-tape due to increasing complexity of requirements across all areas: Manufacturing & GMP; Labelling; Advertising; and evidence interpretation.

Calls for the regulator to align transition periods for a number of regulatory reforms under the MMDR Review, to reduce the impact of changes, have not been met. This has been further compounded by last minute changes. For example, when the 2018 Advertising Code was released in June 2018, companies spent significant resources training staff. The 2018 Advertising Code was re-released with a number of key changes on 31 October 2018, providing businesses 6 weeks before the Code came into effect, and requiring re-training of all staff.

Review Legislative Framework Underpinning Regulation of Therapeutic Goods

The Government accepted the principle of MMDR Recommendation 28; that the Australian Government undertake a comprehensive review of the legislative framework underpinning the regulation of therapeutic goods, including a review of the *Therapeutic Goods Act 1989* and associated Regulations in their entirety, with a view to simplifying its structure and language to achieve a more user-friendly approach.

CMA believes it is crucial to implement the intent of this recommendation in light of the TGA's increasing compliance and enforcement actions to provide a fair opportunity for all businesses, and a level playing field for smaller businesses with lower financial resources. To increase enforcement in an exceedingly complex and non-user-friendly framework, without fulfilling the recommendation to make the legislation more simplified and user-friendly, is putting the 'cart before the horse' and providing an extremely difficult regulatory environment that will see international competitors with far less red tape complexities take competitive advantage of critical overseas markets. As the recommendation alluded to, an assessment should be made on the need for a more comprehensive review of the legislative framework underpinning the regulation of therapeutic goods. As demonstrated by legislative reforms by NICNAS, a new and simplified legislative scheme is possible.

Additional Regulator Resources to Upgrade eBusiness Services

Unless specifically exempt, complementary medicines supplied in Australia are required to be entered onto the Australian Register of Therapeutic Goods (ARTG) maintained by the TGA. Unless they are included on the ARTG, complementary medicines cannot legally be imported, exported, manufactured, or supplied to consumers. Because the vast majority of complementary medicines are in the lower risk AUST L category, sponsors access the eBusiness portal to include, update or amend product listings.

Under the MMDR, the TGA has established a list of 'permitted indications' from which sponsors must exclusively draw from when listing an AUST L product on the ARTG. This, among other changes to eBusiness, has led to an increasingly overwhelmed, extremely slow and unpredictable IT system. For businesses that routinely update numerous listings, the loss of productivity with IT glitches can be significant.

Recommendations:

- Minimise business burden resulting from TGA implementation of regulatory reforms via alignment of timelines.
- Provide the TGA with funding to undertake a comprehensive review of the legislative framework underpinning the regulation of therapeutic goods.
- Providing flexibility to compliance and enforcement approach in situations that do not represent a high safety risk and where the legislation and regulatory framework is unclear and/or subjective.
- Provide the TGA with funding to upgrade the eBusiness support systems.

Final Word

In a supportive business environment, the Australian complementary medicines industry is expected to continue its positive growth trajectory, increasing innovation-rich manufacturing and providing a significant contribution to our country's exports.

There is now robust evidence in a number of areas that complementary medicines are a valuable and cost-effective way to improve health outcomes. An ageing population and increasing rates of chronic disease foreshadow higher healthcare costs in the future unless there is a focus shift towards early prevention, encouraging healthy and active ageing, and supporting individuals to take control over their health.

To fully realise the contribution that complementary medicines can make to the health of our communities, research is essential for continuing to establish their safety and efficacy, to contribute to understanding best practice for integrative health care, and to develop innovative new products. The Australian complementary medicines industry, with high quality products supported by one of the most rigorous regulatory frameworks in the world and exceptional research organisations, has much to offer – quite simply, the best of natural health.

CMA appreciates the opportunity to offer its recommendations regarding priorities for the 2019-20 Federal Budget.

Complementary Medicines Australia

Complementary Medicines Australia (CMA) is the peak industry body representing over 150 members from the whole of the complementary medicines value chain, including manufacturers, raw material suppliers, distributors, consultants, retailers, allied health professionals and educators.

CMA promotes appropriate industry regulation and advancement to ensure consumers have access to complementary medicines of the highest quality.

Regulated in Australia as medicines under the *Therapeutic Goods Act 1989*, complementary medicines include vitamins, mineral and nutritional supplements, homeopathic, aromatherapy products and herbal medicines. The term 'complementary medicines' also comprises traditional medicines, which includes traditional Chinese medicines, Ayurvedic, Australian Indigenous and Western herbal medicines.

ⁱ Zhongpeng Zhang, CCCMHPIE (2018) Development and Trade Performance of China's Nutraceutical Industry, CMA Annual Conference September 19, 2018 Sydney Australia.

ⁱⁱ Commonwealth of Australia (2017) Complementary Medicines Industry Capability Report.

ⁱⁱⁱ Complementary Medicines Australia (2018) Australia's Complementary Medicines Industry Snapshot 2018

^{iv} Austrade (2017) Complementary Medicines in China: A guide for Australian business

^v Tan, X., Liu, X. & Shao, H. 2017, "Healthy China 2030: A Vision for Health Care", Value in Health Regional Issues, vol. 12, pp. 112-114

^{viii} Siddiqui, Y. (2018). India – Health Supplements Opportunity. Austrade.

^{vii} *ibid*

^{viii} *ibid*

^{ix} Australian Institute of Health and Welfare 2018. Australia's health 2018: in brief. Cat. no. AUS 222. Canberra: AIHW.

^x Australian Government. (2015). New stats reveal 50% of Australians battling disease. Accessed from <https://www.health.gov.au/internet/ministers/publishing.nsf/Content/health-mediarel-yr2015-lev100.htm>

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^{xii} The Practitioner Research and Collaboration Initiative (PRACI) <https://praci.com.au>

^{xiii} McKell Institute (2017). Picking the low-hanging fruit: Achieving a more equitable and sustainable health care system. Equity Economics, Sydney.

^{xiv} Boyages, S.C. (2016). Vitamin D testing: new targeted guidelines stem the overtesting tide. MJA 204 (1) doi: 10.5694/mja15.00497

^{xv} McKell Institute (2017). Picking the low-hanging fruit: Achieving a more equitable and sustainable health care system. Equity Economics, Sydney.

^{xvi} Middleton P, Gomersall JC, Gould JF, Shepherd E, Olsen SF, Makrides M. Omega-3 fatty acid addition during pregnancy. Cochrane Database of Systematic Reviews 2018, Issue 11. Art. No.: CD003402. DOI: 10.1002/14651858.CD003402.pub3.

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