



**National Council of  
Women of New Zealand**

Te Kaunihera  
Wahine O Aotearoa

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**Submission to the Ministry of Health on the Proposal that Herbal Medicine become a regulated Profession under the Health Practitioners Competence Assurance Act 2003**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 42 Nationally Organised Societies. It has 31 branches throughout the country and meetings are attended by representatives of those societies and some other 150 organisations and individual members.

The function of NCWNZ is to work for the well-being of women, the family and the community at local, national and international levels through research, study, discussion and action.

NCW is grateful for this opportunity to make a submission on this document. Responses have been received from members of the Health Standing committee and from the Nucleus Committee. Membership was consulted and contributions were received.

**General Comment**

NCWNZ supports the proposal from the New Zealand Association of Medical Practitioners (NZAMH) that Herbal Medicine be approved as an additional profession for inclusion in the scope of the Health Practitioners Competence assurance Act 2003 (HCPA Act).

**Specific Comments**

Members strongly believe Herbal Medicine is a Health Service as defined by the HCPA Act in that Herbal Practitioners still appear to be working through and making decisions about requirements of the responsible authorities such as:

- Revising Educational standards
- Defining risks
- Suggesting Scope for practice
- Maintenance of Professional Standards

From comments received from NCWNZ's wide membership, it was ascertained that benefits could include:

- Improved consumer safety
- Improved practitioner training and enforcement of minimum standards in training
- Reliable information readily available
- '« Appropriate mechanisms for accountability - practitioners would be held accountable
- Quality best practice initiatives could be established.
- Quality improvement systems could also be established.
- Enhanced professional status – recognition





**Conclusion:**

Public safety is paramount and on this basis NCWNZ would certainly not oppose inclusion of medical herbalists under the Health Practitioners Competence Assurance Act 2003.

NGWNZ thanks the Ministry for the opportunity to have input into this consultation document and looks forward to the outcome.

Christine Low  
**President**

Christine Davies  
**Convener Health standing Committee**