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**Exposure Draft of Therapeutic Goods Amendment (2017 Measures No. 1) Bill and related measures**

Dear Members of the Senate inquiry

We are members of The Centre for Research in Evidence Based Practice, at Bond University. We have noted with alarm the proposed changes that are being considered by the Committee, which, notwithstanding the potential financial benefits from relaxing the regulations around different kinds of treatments, we see as causing unintended consequences of increasing harms from treatments – already extremely high – and risking confusion and obfuscation among practitioners and the general public about effectiveness of treatments. Accordingly, we would like to submit the following changes:

We ask the Senate Community Affairs Legislation Committee to:

1. Recommend that the government postpone abandoning the current system of pre-approval of advertisements until the formal 3-year review of the reform package has been completed. This would enable data to be used as a performance indicator of the advertising reforms (Part 2 of the Bill - Removal of requirement for advertisements to be approved).

2. Change one word of Division 6, section 42DV of the Bill:

*‘the Secretary may, in writing, direct...’.*

We propose that *‘may’* should be changed to *‘must’*, to reduce complaints about the TGA’s lack of transparency.

3. Ask the TGA what it proposes by ‘involving stakeholders’ in the new advertising system.

4. Require the TGA to add to their list of permitted indications (26BF of the Bill) that indications citing traditional evidence must include a statement along the lines of:

*‘This traditional indication is not in accordance with modern medical knowledge; nor there is there scientific evidence this product is effective’.*


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5. Recommend that the focus of the new Code and complaint system, and the legislative changes required, be broadened to encompass all therapeutic claims, including those made about food, not just therapeutic goods.

Yours sincerely



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