

JOINT INDUSTRY POSITION STATEMENT REGULATION OF THERAPEUTIC PRODUCTS IN NEW ZEALAND

1. While the Therapeutic Products & Medicines Bill is on hold, industry is left in an unacceptable position of uncertainty. Parts I – V of the Bill should therefore be formally withdrawn or defeated.
2. Work must begin immediately on a new NZ system of regulation specific to natural health products and devices based on the recommendations of the first health select committee report into this issue.
3. New Zealand natural health regulation must be -
 - constituted under its own Act of Parliament;
 - controlled by a small stand alone body not also tasked (directly or indirectly) with controlling pharmaceuticals, staffed by those with established backgrounds in the sector (not those who routinely disparage the industry);
 - proportionate to an objective and independent risk assessment of the natural health sector based on properly corroborated data; and
 - designed in consultation with leading natural health industry and consumer groups who can demonstrate widespread public or industry endorsement and approval.
4. The NZ system of natural product regulation should contain the following basic elements:
 - A computer based product register that records all natural health products sold in New Zealand via a simple self-assessment electronic system.
 - A manufacturing procedures (GMP) system, appropriate to the quality risk posed by the products, and based on qualified and robust systems and procedures.
 - A ‘negative list’ of ingredients or products that are banned or controlled because they do not meet acceptable international standards. The negative list should be maintained on an online database so the health practitioners and health authorities are well informed.
 - A system of random testing of products to ensure compliance and that products are true to label.
 - An advertising code specific for Natural Health Products, administered by a co-regulatory body of industry, consumers and regulators – which will include a complaint resolution panel.
 - A Guideline on Levels of Evidence that requires industry to hold evidence to support claims but encourages industry to provide consumers with balanced information on the use and benefits of natural healthcare products.
 - An Expert Advisory Committee comprising persons with expertise and knowledge of natural healthcare.

5. If the Therapeutic Products and Medicines Bill is brought back to the house then the legislation must be amended to specifically exclude the joint agency from having any jurisdiction over natural health products and devices (including those with a natural health component) with the definitions of these industries to be agreed following proper consultation.
6. The following will not be accepted:
 - Any “opt in/opt out” system from a Trans Tasman agency for NZ domestic natural products.
 - A parallel NZ agency for natural products reflecting the ANZTPA rules in all but name.
 - Planned regulatory creep which would see natural products brought within a joint agency over time.
 - Regulation of natural health products under ANZTPA.
 - Regulation of natural health products under the same system as Pharmaceutical and over the counter medicines in any way.

Prepared by the NZ Health Trust July 2007.

This position is supported and endorsed by the following businesses/organisations:

<i>New Zealand Health Trust</i>	<i>New Health NZ</i>	<i>New Zealand Charter of Health Practitioners</i>
<i>Grey Power Federation</i>	<i>Pharmaceutical Compounding NZ Limited</i>	<i>Health & Herbs International Limited</i>
<i>New Zealand Nutritionals Limited</i>	<i>Natural Health Laboratories Limited</i>	<i>Alliance for Natural Health</i>
<i>Citizens for Health Choices</i>	<i>Xtend-Life Natural Products (Intl) Limited</i>	<i>Russ International</i>
<i>About Health Supplements Limited</i>	<i>New Zealand Longevity Foundation</i>	<i>Genesis Bio-laboratory Limited</i>
<i>New Zealand Herb Foundation</i>	<i>Healthy Options Limited</i>	<i>Herbal Limited</i>
<i>Natural Therapies Limited</i>	<i>Healthy Options Magazine</i>	<i>Market New Zealand</i>
<i>KiwikitZ Limited</i>	<i>The Day Stay Natural Detox Centre</i>	<i>Healthy Options Charitable Trust</i>
<i>Skybright Natural Health Limited</i>	<i>New Zealand Health Food Company</i>	<i>Strauss Herbs NZ Limited</i>
<i>Nature Source Organics Limited</i>	<i>Health Freedom NZ</i>	<i>Tasman Trading Company Limited</i>
<i>Hair & Skin Clinic, Auckland</i>	<i>Health Seekers Limited</i>	<i>Waitakere Holdings Limited</i>
<i>Natural Health Alliance, Australia</i>	<i>Tibetan Natural Medicine</i>	<i>Deer Products International Limited</i>

<i>Production Laboratories</i>	<i>The Good Life Shop</i>	<i>Andeer (NZ) Limited</i>
<i>Alchemy Magic TH</i>	<i>Vibrational Essences</i>	<i>Ananda Clinic & Spa</i>
<i>Wellness-Vitality.com</i>	<i>St Benedicts Health Care</i>	<i>Cynthia Glover HbT</i>
<i>Creative Energy Holdings Limited</i>	<i>Wah Lee Ltd</i>	<i>Gramart Foods Limited</i>
<i>Solvent Rescue Limited</i>	<i>Wellness 4 U Clinic Limited</i>	<i>Usana Health Sciences</i>
<i>Rowena Matheson</i>	<i>Just Thyme Health</i>	<i>Thymeline Limited</i>
<i>Healthright</i>	<i>Barry Blake Associates Ltd</i>	<i>Sole Talk Reflexology</i>
<i>Biotrace Limited</i>	<i>Greg Villers, Practitioner</i>	<i>Endo Health Ltd</i>
<i>Homeopathic Association of NZ</i>	<i>Enriching Lifestyle</i>	<i>Tracey Bevan, Practitioner</i>
<i>Debra Wynn, Distributor</i>	<i>4Life Research Distributors</i>	<i>Celestial Essentials</i>
<i>4 Health Direct</i>	<i>Whole Health International Ltd</i>	<i>Return 2 Health Ltd</i>
<i>Performance Formulas NZ Ltd</i>	<i>Cathy Gaul, Practitioner</i>	<i>Numia Healthcare</i>
<i>Fuimanu Etuale, Supplier</i>	<i>Body Minders</i>	<i>New Future</i>
<i>Michelle Koolen Nutrition</i>	<i>Medical Imaging</i>	<i>Longchamps Marketing</i>
<i>Fitkiwi Personal Training</i>	<i>A Stress Free Day Ltd</i>	<i>Muriel Walton, Supplier</i>
<i>Acu-power TCM</i>	<i>Infinite Integrity</i>	<i>4 Health Direct Distributors</i>
<i>Tony Penman, Supplier</i>	<i>HFL Management Ltd</i>	<i>K & S Walton Ltd</i>
<i>Annette Irwin</i>	<i>Organic Bodies</i>	<i>Kirsti Treanor, Distributor</i>
<i>NZ Essentials Ltd</i>	<i>Total Body Therapy Limited</i>	<i>Gordon Steer, Distributor</i>
<i>George Nelson, Distributor</i>	<i>Welcome Australia Limited</i>	<i>Bev Spraggs, Distributor</i>
<i>OBC Business Centre</i>	<i>John Crossley Manufacturing</i>	<i>AA Auckland Hypnotherapy Clinic</i>
<i>Milford Naturopathic Clinic</i>	<i>Pink Waterlily Health Centre</i>	<i>Gaelene Dorreen, Distributor</i>
<i>TeAra Bergstrom, Distributor</i>	<i>In4more Limited</i>	<i>Annett Grannetia, Distributor</i>
<i>John Maxwell, Distributor</i>	<i>Satori.cc Limited</i>	<i>Desiree de Leeuw, Distributor</i>
<i>Guo Chen, Distributor</i>	<i>Sara Keen, Childbirth Educator</i>	<i>Natural Wellness Clinic</i>

<i>Neways International</i>	<i>Kerry Brear, Distributor</i>	<i>Natural Health</i>
<i>Soil to Soul</i>	<i>National Innovation Centre</i>	<i>Vicki Rielly</i>
<i>Robert Andrews, Distributor</i>	<i>Homeopathy by Natural Touch</i>	<i>O'Connor Bioenergy</i>
<i>Onlinebizco</i>	<i>Brooker Colour Therapy</i>	<i>Train Your Brain Limited</i>
<i>Fewtrell Limited</i>	<i>The Health & Wealth Coy Limited</i>	<i>Modern Health</i>
<i>Naturopathic Clinic</i>	<i>Waymouth's Pharmacy</i>	<i>Tanya Bottomley, Distributor</i>
<i>Ngaruawahia Medical Centre</i>	<i>Sally Randall, Reflexology Holistic Health Practitioner</i>	<i>Karen Maniapoto, Wholistic Therapist</i>
<i>Inner Sources</i>	<i>Andrew Buckley, Osteopathic Physician</i>	<i>Simmilea Homeopathy</i>
<i>Abundant Health Limited</i>	<i>Claridges Organic Limited</i>	<i>Suzi Wallis, Concerned Consumer</i>
<i>Japanese Acupuncture Limited</i>	<i>Auckland College of Classical Homeopathy</i>	<i>Pacific International Nutrition NZ Limited</i>
<i>Safe Earth Limited</i>	<i>Advanced Natural Medicine Limited</i>	<i>Rockrowan Limited</i>
<i>Eunice & Bill Powell, Distributors</i>	<i>Health Australasia Limited</i>	<i>Spirit of Sage</i>
<i>Shelley Reid, Practitioner</i>	<i>Bay Chiropractic @ the Mount</i>	<i>AQS Limited</i>
<i>Godfrey Medical Limited</i>	<i>Biomedical Supply Co Ltd</i>	<i>Pro-soma Distributors</i>
<i>House of Tang Limited</i>	<i>Tri-Atomic Oxygen Limited</i>	<i>Apollo Health</i>
<i>Ali Burton N.D, Naturopath</i>	<i>Monarch Natural Health Limited</i>	<i>Tracey Bevan, Practitioner</i>
<i>Linda Baker, Practitioner</i>	<i>Jacqueline Crawford, Practitioner</i>	<i>MicroBiz NZ</i>
<i>Pinehurst Beauty Therapy</i>	<i>Country Meadow Herbal Clinic</i>	<i>Kristine Lyall, Practitioner</i>
<i>Lorraine Lister, Practitioner</i>	<i>Gerda Codling, Selfhealer</i>	<i>Godfrey Medical</i>
<i>Titirangi Natural Health Clinic & Herbal Dispensary</i>	<i>Kowhai Clinic</i>	<i>Distribution International Limited</i>
<i>Art of Healing</i>	<i>Horizon Clinic Hypnotherapy</i>	<i>JustWorkout North Shore Limited</i>
<i>Vitality Center (NZ) Limited</i>	<i>Craig Seona, Practitioner</i>	<i>Functional & Integrative Medicine Limited</i>

<i>Shelley Burt, Distributor</i>	<i>Capsuful NZ Ind Limited</i>	<i>Unichem Downtown Plaza Pharmacy</i>
<i>Optimal Health Centre Limited</i>	<i>Red Seal Natural Health</i>	<i>Natural Assets Limited</i>
<i>Health Options</i>	<i>New Millenium Essences</i>	<i>Natural Health Zone</i>
<i>Pinehurst Beauty Therapy</i>	<i>First Light Flower Essences of New Zealand</i>	<i>Te Wahi Ora Retreat Centre</i>
<i>Gevir Products NZ Limited</i>	<i>Healthy 10/20</i>	<i>CuisAnn</i>
<i>Way of Life</i>	<i>The Healing Business</i>	<i>John Nannes, Practitioner</i>
<i>Naturo Pharm Limited</i>	<i>Waveney Reta, Practitioner</i>	<i>BodyBrain Integration Limited</i>
<i>Susan McAllister, Practitioner</i>	<i>Neways NZ Limited</i>	<i>Bob Alexander, Distributor</i>
<i>Kelly Towers, Practitioner</i>	<i>Organic Living Healthfoods</i>	<i>True Health</i>
<i>Nells Health & Healing Centre</i>	<i>Healthnuts Wholefoods</i>	<i>The Natural Health Co</i>
<i>Modern Health Limited</i>	<i>Apollo Health Natural Nutrition</i>	<i>Floatforest</i>
<i>Takapuna Health Store</i>	<i>Red Flax Clinic</i>	<i>Massage.co.nz</i>
<i>Hibiscus Agencies</i>	<i>Kirker Health</i>	<i>AlterNative Therapies</i>
<i>Niara Blue Limited</i>	<i>Waitakere Holdings Limited</i>	<i>Unique Health – Usana Health Science – Independent Associates</i>
<i>New Zealand Herbals</i>	<i>Naturelab Limited</i>	<i>Pukunui Herbs NZ Limited</i>
<i>Health for Life Kapiti Limited</i>	<i>NorthShore Acupuncture & Osteopathy Clinic</i>	<i>Christine Gardner, Practitioner</i>
<i>Takapuna Health Store</i>	<i>Arcadia Organics Shop & Café & Takehome</i>	<i>Celtic Shaman Limited</i>
<i>Psychological Consultancy</i>	<i>Coleur Moi</i>	<i>Anja Hambach Naturopath</i>
<i>Michelle Maguire, Practitioner</i>	<i>Marina Scoon, Practitioner</i>	<i>Body Recon. Massage Therapy</i>
<i>Platinum Marketing Limited</i>	<i>Beautiful World Limited</i>	<i>Miessence</i>
<i>The Natural Therapy Centre</i>	<i>The Natural Health & Gift Shop</i>	<i>ANANDA Clinic & Spa: Ayurvedic & Panchakarma Clinic</i>
<i>Japanese Acupuncture</i>	<i>Holistic Health Naturopathic Clinic</i>	<i>Meadowgold Health</i>

<i>Ear Candles by Louise</i>	<i>Cherish Wellbeing</i>	<i>Jenny Connell, Practitioner</i>
<i>Putiputi Ra Health & Organic Store</i>	<i>Welcome Australia Limited</i>	<i>McTimoney Holistic Therapists</i>
<i>Sportswell Limited</i>	<i>Performance Formulas NZ Limited</i>	<i>HCH Formulas Limited</i>
<i>Kaller Enterprises Limited T/A Herbal House</i>	<i>Walking in Balance</i>	<i>Manu Nutraceuticals Limited</i>
<i>Vital Health Center</i>	<i>SPAA (NZ)</i>	<i>Pain & Kershaw Limited</i>
<i>Freshways Forward Limited</i>	<i>Pain Solutions Limited</i>	<i>Church Corner Natural Foods</i>
<i>Milford Health Clinic</i>	<i>Simillimum Homeopathic Pharmacy</i>	<i>Autumn Donovan, Practitioner</i>
<i>NZ Vaccination Information Network</i>	<i>Acupuncture New Zealand</i>	<i>Wendy Hollart, Practitioner</i>
<i>Cornucopia Distributors Limited</i>	<i>Shiatsu/CranioSacral Therapies</i>	<i>Ceres Enterprises Limited</i>
<i>For Smashing Good Teeth Limited</i>	<i>Cornucopia Natural Foods</i>	<i>Esther Kivi - Kinesiologist</i>
<i>Levonne Hart - Kinesiologist</i>	<i>Dr Chad – Chiropractor for Life</i>	<i>Christine Hetherington - Naturopath</i>
<i>NZY Distributors Limited</i>	<i>Aroma (NZ) Limited</i>	<i>Natural Health 2000</i>
<i>Formanz Bowen Therapy</i>	<i>Natural Therapies</i>	<i>Elizabeth Amber – Practitioner</i>
<i>Beta-4-U Natural Therapies</i>	<i>Botanicals Herbal Dispensary</i>	<i>Bodycalm Nueromuscular Therapy</i>
<i>Gillian Sandford</i>	<i>Natures Sunshine/Massage Therapy</i>	<i>Waveney Hayes – Practitioner</i>
<i>Ethos Limited</i>	<i>Jennifer Scott – Practitioner</i>	<i>Sensational Nutrition</i>
<i>AUM Limited</i>	<i>Colon HydroTherapy</i>	<i>PKP International Limited</i>
<i>Humankind Consultants</i>	<i>Mariel Rosalind – Practitioner</i>	<i>Back to Basics</i>
<i>VitalSigns Clinic</i>	<i>Ponsonby Health Shop</i>	<i>Natural Bodylink</i>
<i>Starwatcher Limited</i>	<i>Healthaire Limited</i>	<i>Te Haoura O Te Hiku O Te Ika</i>
<i>Samarth Ayurvedic Centre</i>	<i>Life In Essence</i>	<i>Home Herbal Clinic</i>
<i>Prana Limited</i>	<i>He Oranga Trust</i>	<i>Rainbow Valley Farm</i>
<i>Saskia Scaddan</i>	<i>Earth Energies</i>	<i>Advanced Body Mind</i>

Therapies

<i>Sinus Solutions</i>	<i>Margaret Forbes – Distributor</i>	<i>Wellness at Work Limited</i>
<i>2 Way Airtime Services Limited</i>	<i>New Zealand Trade Merchants Limited</i>	<i>Peter Ellis – Distributor</i>
<i>Natural Healing</i>	<i>New Image</i>	<i>Contract Manufacturing of Supplements – Hamish Tijsen</i>
<i>North Shore Acupuncture and Osteopathic Clinic</i>	<i>Health 2000 Naturia</i>	<i>Meridian Kinesiology</i>
<i>Baggage Busters Limited</i>	<i>Rotorua Homeopathic Clinic</i>	<i>The Natural Health Shop & Therapy Centre</i>
<i>Enriching Day Spa</i>	<i>Omega Health Clinic Ltd</i>	<i>Self Heal Limited</i>
<i>Kapiti Shiatsu</i>	<i>NZ Light & Colour Therapy Institute Inc</i>	<i>Baywide Bowen and Therapy Clinic</i>
<i>SCS Health</i>	<i>Robina Bodle, Naturopath</i>	<i>Good Health Clinic</i>