

Guidelines for Safe Prescribing of Chinese Herbal Medicine

Overview

The Chinese Medicine Council of New Zealand (The Council) is charged under the Health Practitioners Competence Assurance Act 2003 (The Act) to protect the health and safety of the public by ensuring that Chinese Medicine (CM) practitioners are fit and competent to practise their profession. At all times CM practitioners must work within the limits of their own professional scopes of practice and competence and are accountable for ensuring that all health services they provide are consistent with their educational skill level.

These guidelines for safe Chinese herbal medicine practice provide guidance for practitioners on prescribing and providing information to tangata whai ora, and the compounding, dispensing and labelling of Chinese herbal medicines. This will support protection of the public by ensuring the safe prescribing of Chinese herbal medicine by those practitioners registered in the scope of 'Chinese Herbal Medicine Practitioner'. Chinese medicine students who perform supervised clinical treatment should also be familiar with these guidelines.

These guidelines apply to Chinese herbal medicines, or any other medicines prescribed, and/or compounded and/or dispensed as part of the professional practice of registered Chinese medicine practitioners. They apply to all oral and topically applied medicines.

Chinese herbal medicines include the following product types:

- Raw herbs (fresh, dried and/or traditionally processed);
- Decoctions of single or multiple ingredients;
- Extracts (powders, granules or liquids);
- Pills, tablets or capsules; and
- Compounded topical preparations including, washes, liniments, ointments etc.

CM practitioners must identify and manage health and safety risks within their practice environment

While many herbal products are low-risk, their use is not always entirely without risk, particularly for people with co-morbidities or who are taking other medicines. CM practitioners must understand the indications, precautions, contraindications, and risks associated with each aspect of treatment including the safe prescribing of herbal medicines. This will ensure that the tangata whai ora's regular health professional is informed about the use of herbal medicines and, if necessary, can assist with the management of any clinical risks induced by these herbal products.

CM practitioners should also consult evidence-based information about herb/drug interactions prior to prescribing¹. CM practitioners are advised to document the extent to which these considerations are given and conveyed to tangata whai ora.

CM practitioners must be familiar, and comply, with legal and professional obligations

Chinese medicine practitioners must comply with all legislation relevant to the practice of Chinese medicine in the geographical area where they practise. Practitioners are also reminded of their obligations under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

As practitioners are often both the prescriber and the dispenser, they are to ensure that the decision to prescribe and supply a medicine is always in the best interest of tangata whai ora.

CM practitioners must communicate effectively ensuring ongoing informed consent

Practitioners are to provide enough information about medicines to comply with the requirements for informed consent. If requested, a copy of the prescription is to be provided.

The practitioner must inform tangata whai ora about common side effects (usually mild and transient), and what to do if they are concerned about a potential adverse reaction. This is both good clinical practise, and consistent with the requirements for informed consent.

Prescription Requirements

Clear and complete information about each prescription of herbs is to be recorded for every consultation. Overseas CM herbalists may have studied in their own language and learned the Chinese, Korean, Japanese or Vietnamese names of the herbs. However, in order to protect the public, the documentation of herbal formulae, and their ingredients, in New Zealand must be understood by all other members of the healthcare team of the tangata whai ora, such as when a person is admitted to hospital, or when there is a suspected adverse event, or when prescribing another medicine which may interact with the herbal medicine(s).

The Council endorses the use of the **pin yin** as the most appropriate herbal nomenclature for use in Chinese medicine in New Zealand. *Pin yin* names are widely used in Chinese medicine textbooks, can be understood, and used, by both English and non-English speakers, and can be readily searched on the internet by all healthcare professionals. The Chinese Medicine Board of Australia commissioned the development of a Nomenclature compendium of commonly used herbs and other ingredients of Chinese medicine (the Nomenclature compendium), based on the pharmacopoeia of the People's Republic of China (Zhong Hua Ren Min Gong He Guo Yao Dian) (中华人民共和国药典) (PPRC) to support consistent terminology. This Nomenclature compendium is freely available on the Board's website to help all health practitioners and support the safe practice of Chinese herbal medicine practice². This compendium outlines the authorised naming, and labelling, of commonly used Chinese herbal medicines in Australia. The Council supports and advocates for the use of this document in the naming and labelling of CM products in New Zealand clinical practice.

These requirements will ensure that herbs are easily identified so that tangata whai ora can:

¹ Braun, L., & Cohen, M. (2020). *Herbs & natural supplements: An evidence-based guide* (4th ed., Vol. 2). Elsevier.

² [Chinese Medicine Board of Australia - Guidelines for safe practice of Chinese herbal medicine](#)

- Use the medicine safely;
- Know what herbs they are taking; and
- Readily find the information they need about the medicine or access further information.

The Council, therefore, requires registered herbalists to write their prescriptions in English (or in pin yin for the herbal formulae name) on prescriptions and labels and:

- Use clear and consistent herbal nomenclature;
- Record adequate details of Chinese herbal medicines in clinical health records;
- Write detailed prescriptions, printed or hand-written clearly and legibly, in English;
- Herb names are to be in *pin yin* in accordance with the Chinese Medicine Board of Australia's Nomenclature compendium of commonly used Chinese herbal medicines;
- Ensure medicine labelling is accurate and informative; and
- Ensure compounding and dispensing of medicines is precise, accurate for the ingredients, and professional.

When using raw herbs and herbal extracts, the following must also be included, in English. The same information can also be provided in another language to promote compliance and safety:

- The person's name (given name and family name) (and parent, guardian, or agent when applicable);
- The name, registration number and contact telephone number of the prescriber, and their signature;
- Date prescribed (day/month/year);
- Names of the herbs in *pin yin* and amounts of each herb (measured in grams);
- Form of processing (when relevant);
- Specific directions for use (dose, preparation/cooking, route of administration, frequency, timing of consumption);
- Number of packets (where relevant);
- The expiry date of the prescription (i.e., date 'not to be taken after'); and
- Specific warnings³ (when appropriate).

Precautions and contraindications when prescribing herbal preparations

- Practitioners must refer to clinical Materia medica texts for individual herbs or formula precautions and contraindications;
- The tangata whai ora must be questioned about any known allergies to food groups, plant, or animal products;
- Consideration must be given to the person's constitution as well as the presenting condition or illness;
- Apply caution during pregnancy; and
- Pharmaceuticals: efficacy may be inhibited or enhanced by herbal preparations. Take precautions with tangata whai ora who may be taking anticoagulants, antidepressants, or anti-

³ Warnings on keeping out of reach of children may be required for example when even a small quantity if ingested could be toxic or where a choking hazard occurs due to the size of parts of herbs. Such warnings are to be legible and prominent.

hypertensives. Note the contraindications of these western medicines when prescribing herbal preparations.

References and Further Reading

Braun, L., & Cohen, M. (2020). Herbs & natural supplements: An evidence-based guide (4th ed., Vol. 2). Elsevier.

Chinese Medicine Board of Australia: Chinese herbal medicine guidelines November 2015 [Chinese Medicine Board of Australia - Guidelines for safe practice of Chinese herbal medicine](#)

Chinese Medicine Board of Australia: Nomenclature compendium of commonly used Chinese herbal medicines.

<https://www.chinesemedicineboard.gov.au/documents/default.aspx?record=WD15%2f18746&dbid=AP&chksum=C%2baCFhYVrzbzL2%2bYnhtRA%3d%3d>

Chinese Medicine Board of Australia: Quick reference guide - Guidelines for safe Chinese herbal medicine practice

<https://www.chinesemedicineboard.gov.au/documents/default.aspx?record=WD16%2f21195&dbid=AP&chksum=N9O4ZujgT1U5LxdbNAGudg%3d%3d>

Chinese Medicine Board of Australia: User guide - Nomenclature compendium for Chinese herbal medicines.

<https://www.chinesemedicineboard.gov.au/documents/default.aspx?record=WD15%2f18883&dbid=AP&chksum=nIN1qp1FdDc8w5ktnl21Bw%3d%3d>

Convention on International Trade in Endangered Species of Wild Fauna and Flora [Front | CITES](#)

[Medsafe: Guideline on the Regulation of Therapeutic Products in New Zealand](#)

[Medsafe: Overview of Therapeutic Product Regulation \(PDF 395 KB, 24 pages\)](#)

[NZ Legislation: Medicines Act 1981, section 4](#)

Examples of Prescriptions (from the Chinese Medicine Board of Australia: Chinese herbal medicine guidelines)

The following are examples showing how a prescription can comply with these guidelines. You do not need to use this format but it will give you some ideas about how to lay out your prescriptions. Prescriptions may be handwritten or printer-generated, as long as they contain the information required by these guidelines.

Prescription 1: Individualised formula – raw herbs. Nomenclature of herbs in *pin yin*

Dr White Tiger, Gentle Chinese Medicine Clinic Registration number: CMR 00012345 23 Evergreen Ave, Morningmeadow, NSW, 2000 Phone: 02 1234 5678; AH 0400 123 456		
Patient: Ms May Citizen		
Date: 2 December 2014		
Ingredients	(g)	Directions for use (example) Empty contents into a clay-pot. Submerge herbs in 3 cups of water and bring to the boil. After 5 minutes of medium, intense heat, turn down and simmer until $\frac{3}{4}$ of the liquid is left. Drain the liquid into a cup and drink it all, while warm, after a meal. Keep herbs in the fridge overnight and repeat the cooking procedure next day. Discard the herbs after the second cooking. Do not use metal utensils in the preparation or storage of herbs.
Dang Shen	9g	
Fu Ling	9g	
Sheng Gan Cao	6g	
Sheng Di Huang	15g	
Bai Shao	9g	
Dang Gui	9g	
Chuan Xiong	6g	
Sang Ji Sheng	9g	
Du Huo	9g	
Huai Niu Xi	9g	
Qin Jiao	9g	
Fang Feng	9g	
Wei Ling Xian	9g	
Rou Gui	2g	
Du Zhong	9g	
Not to be dispensed after: 1 month from date of prescription		
Number of repeats: 1		
Warnings If symptoms persist or you experience any unexpected symptoms, contact the Chinese medicine practitioner or medical practitioner.		
Signature:		

Prescription 2: Handwritten sample

Dr White Tiger, Gentle Chinese Medicine Clinic Registration number: CMR 00012345 23 Evergreen Ave, Morningmeadow, NSW, 2000			Phone: 02 1234 5678; AH 0400 123 456
Patient: <i>Mr. Ivan Citizen</i>			
Date: <i>2 December 2014</i>			
Ingredients	(g)		Directions for use (example)
Dang shen	9g	党参	Empty contents into a clay pot. Submerge herbs in 3 cups of water and bring to the boil.
Fu Ling	9g	茯苓	
Sheng Gan Cao	6g	生甘草	After 5 minutes of medium, intense heat, turn down and simmer until ¾ of the liquid is left.
sheng Di Huang	15g	生地黃	
Bai shao	9g	白芍	Drain the liquid into a cup and drink it all, while warm, after a meal.
Dang Gui	9g	当归	
Chuan Xiong	6g	川芎	Keep herbs in the fridge overnight and repeat the cooking procedure next day.
Sang Ji sheng	9g	桑寄生	
Du Huo	9g	独活	Discard the herbs after the second cooking.
Huai Niu Xi	9g	怀牛膝	
Qin Jiao	9g	秦艽	Do not use metal utensils in the preparation or storage of herbs.
Fang Feng	9g	防风	
Wei Ling Xian	9g	威灵仙	
Rou Gui	2g	肉桂	
Du Zhong	9g	杜仲	
Not to be dispensed after: <i>1 month from date of prescription</i>			
Number of repeats: <i>1</i>			
Warnings <i>If symptoms persist or you experience any unexpected symptoms, contact the Chinese medicine practitioner or medical practitioner.</i>			
Signature:			