



**Submission**  
to  
**Office of Chemical Safety**  
by  
**National Herbalist's Association of Australia**  
regarding  
**Restrictions to Importation of Kava**  
July 2007

**National Herbalists Association of Australia (NHAA)**

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## Executive Summary

- This document has been prepared by the National Herbalists Association of Australia (NHAA), which has represented the interests of professional Western Herbalists Medicine (WHM) practitioners and Naturopaths in Australia since 1920.
- The NHAA considers that Kava (*Piper methysticum*) should be available to qualified practitioners via licensed importers able to supply certificates of analysis for the herb, to ensure that the supplied dry plant materials meets TGA requirements in respect to whole or peeled root only.
- The NHAA believes that Herbalists recognised by the Australian Tax Office as members of professional associations or holders of a Therapeutic Goods Administration advertising exemption certificate should be recognised by the Office of Chemical Safety as persons allowed to access Kava from licensed importers, for medicinal use.

## **Introduction and Background to the National Herbalists Association of Australia**

The NHAA is the key professional Association representing appropriately qualified Western Herbalists and Naturopaths using herbal medicines as their primary treatment modality. It is the oldest professional association of complementary therapists, founded in 1920, with a current full membership of 936 (our total membership is 1461 including student and companion members). This represents approximately one third of practising Herbalists and Naturopaths in Australia. The NHAA is the only national professional association specifically concerned with the practice and education of Western Herbal Medicine (WHM). Details of the Constitution and the Code of Ethics and Standards of Practice of the Association are detailed in Attachments 1 & 2.

The primary aims of the NHAA include to:

- Promote, protect and encourage the study, practice and knowledge of medical herbalism.
- Disseminate such knowledge by talks, seminars and publications.
- Encourage the highest ideals of professional and ethical standards.
- Promote herbal medicine within the community as a safe and effective treatment option.

The Full Membership of the Association elects the Board of Directors of the NHAA, with each member serving a two-year voluntary (unpaid) term after which they may stand for re-election.

Full members of the NHAA have completed training in Western Herbal Medicine sufficient to meet the educational standards as determined by the Examiners of the Board in consultation with tertiary education institutions (standards based on but exceeding the requirements of the NSW Health Training Package), and must adhere to a comprehensive Code of Ethics and Continuing Professional Education (CPE) program.

Since its inception, the NHAA and its members have been at the forefront of herbal medicine and have been influential in areas ranging from education and practice standards, to government regulation and industry standards. The NHAA has a strong commitment to achieving high educational standards in herbal medicine practice and supports regulation of the profession.

Membership is mainly practitioners of Western Herbal Medicine including Naturopaths who choose to use herbal medicine as their major modality of practise.

## Importation of Kava

The NHAA recognises the need to control the importation of Kava (*Piper methysticum*) to protect the health of indigenous communities however the Therapeutic Goods Administration's allows for the importation of Kava for scientific and medicinal purposes.

Many of our members have imported Kava in dried plant form and administered to patients, to prepare as a powder mixed in water and taken, or as a water based extract (infusion or decoction).

Many practitioners believe this is a safer and more effective way to control dosage and allows the practitioner to more readily individualise the dose for each client.

This practice also allows for the cost of the medicine to be minimised and makes it available to a wider cross section of the community for whom the medicine may be indicated.

For safety reasons, the NHAA believes the unprepared Kava (ie. dry whole root or dry peeled root) should continue to be available to Professional Herbalists via purchase from licensed importers able to supply a certificate of analysis of the dried plant material. In this way Herbalists can be assured that they have been supplied with only the whole root or the peeled root of the plant, and employ it in this form or as a water based extraction only, as per TGA Guidelines for this medicinal plant.

Suitably qualified practitioners can be identified in the same manner that the Australian Tax Office recognises suitably qualified Herbalists for GST exemption purposes, by membership of a recognised professional association.