



TRADITIONAL ETHNIC MEDICINES:
PUBLIC HEALTH AND
COMPLIANCE WITH MEDICINES LAW

November 2001

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SUMMARY

1. This note gives information about certain aspects of medicines law which have not always been well understood by businesses or practitioners seeking to operate in the UK ethnic medicines sector. The sector includes traditional Chinese medicine (TCM) and Ayurvedic medicines. Medicines law exists mainly to protect public health and so misunderstanding of, or non compliance with, the law can lead directly to a risk to public health.
2. This guidance is intended primarily for businesses and herbal practitioners operating in the ethnic medicines sector. However, members of the public wishing to find out more about quality and safety issues relating to traditional ethnic medicines may also find the information useful.

INTRODUCTION

3. In 2000 the Medicines Control Agency set up an Ethnic Medicines Forum. The Forum exists to encourage and assist organisations representing businesses and practitioners operating in the UK ethnic herbal remedies sector to improve the effectiveness of self regulations intended to ensure the safety and quality of unlicensed herbal remedies.
4. The Forum recognised that there are weakness in the current UK regulatory regime for unlicensed herbal remedies. (These problems are being considered separately and, in particular, discussions are in progress in Europe on the possibility of a directive on traditional medicinal products.) However, the Forum also noted that there was a problem of lack of awareness by some businesses and practitioners of the *existing* medicines law as it relates to unlicensed herbal remedies, including important provisions intended to protect public health.

IMPORTANT INFORMATION ABOUT THIS GUIDANCE

5. This guidance is not intended as formal guidance on the law and is without prejudice to any action the MCA may decide to take against any person, in connection with its function of enforcing medicines law. Those working in this area should ensure they are familiar with the law and have taken legal advice where necessary *before* beginning their operations. It is important to note that a breach of the relevant rules can be a criminal offence and company directors and managers can be liable as well as companies. (Details of MCA prosecutions are contained in the Enforcement section of the MCA's web site.)

6. The guidance also is not intended to be comprehensive. The particular topics highlighted are ones which reflect concerns of the MCA in its role of protecting public health. The issues selected reflect:

- queries received by the MCA
- information from trade associations about products and ingredients which may have been on the UK market
- problem products brought to the Agency's attention in other ways
- our product testing programme
- action taken by the Agency to ensure compliance with the law, including prosecutions.

The guidance contains a number of tables and lists of products and ingredients. If a particular product or ingredient is not mentioned here it should not be assumed that it is necessarily legal or safe.

Summary of Tables		
<i>Annex</i>	<i>Title</i>	<i>Notes</i>
Annex 1:	Restrictions on Aristolochia and herbal ingredients which may be confused with Aristolochia	
Annex 2:	Summary of herbal ingredients which are either prohibited or restricted.	<i>Includes herbal ingredients listed on:</i> <ul style="list-style-type: none"> • <i>The Medicines (Retail Sale or Supply of Herbal Remedies) Order 1977</i> • <i>The Prescription Only Medicines (Human Use) Order 1997 (as updated)</i> • <i>The Medicines (Aristolochia and Mu Tong etc.) (Prohibition) Order 2001</i>
Annex 3:	Examples of non herbal ingredients in traditional ethnic medicines	<i>Unlicensed herbal remedies are not permitted to contain as active ingredients non herbal ingredients, such as animal parts or minerals. A medicine containing such ingredients would need a product licence</i>
Annex 4:	Examples of Chinese formulae and patent medicines containing ingredients not permitted in unlicensed herbal	<i>This list is not intended to be comprehensive. It underlines the importance of checking every ingredient of patent medicines and formulae to ensure that all are safe and legal</i>
Annex 5:	List of Trade and Practitioner Associations	

TRADE AND PRACTITIONER ASSOCIATIONS

7. It is the policy of the MCA to work closely with trade and practitioner associations operating in this area. These bodies have an important role in promoting improved standards of safety and quality in the ethnic medicines sector. Among the advantages to businesses and practitioners in belonging to organisations of this kind is that members can be informed speedily about any emerging safety issues – whether these are identified by the associations themselves or by the MCA. Where however businesses or practitioners work in isolation they may be less likely to be aware of such issues.

PRODUCT STATUS

8. Many products in the ethnic medicines sector are close to the borderline between medicine and other product categories such as food or cosmetics. Before placing a product on the market, companies need to be clear on the regulatory category into which the product falls and thereafter to follow the requirements relevant to the appropriate regulatory regime. The definition of a medicine to be applied for products placed on the UK market is that set out in European law¹. The MCA Guidance Note 8 explains in more detail how the Agency decides whether a product is a medicine on the basis of this law. It is important to consider each product individually. It is entirely possible that in a company's intended range of products some may legitimately be sold as foods, other as herbal remedies exempt from licensing requirements, while others may not be put on the market unless a marketing authorisation (product licence) is first obtained.

HERBAL REMEDIES SOLD UNDER SECTION 12 OF THE 1968 MEDICINES ACT

9. The remedies:

- must not contain non-herbal active ingredients, but they may contain non-herbal inert substances such as water
- must not be accompanied by written recommendations in the absence of a personal consultation
- must not be given names other than designations specifying the plants used and the processes they have undergone.

The law applies equally where product information is also included in languages other than English.

¹ Article 1 of Directive 65/65/EEC defines a medicinal product as:

"Any substance or combination of substances presented for treating or preventing disease in human beings or animals.

Any substance or combination of substances which may be administered to human beings or animals with a view to making a medical diagnosis or to restoring, correcting or modifying physiological functions in human beings or in animals is likewise considered a medicinal product."

10. Examples of products encountered by MCA which would not meet the requirements of Section 12 are:

- a medicine which contains non herbal, but pharmacologically active, ingredients such as mineral or animal parts
- a medicine with a brand name implying that the product could be used for a particular condition. This would not comply with either the second or the third of the requirements outlined in the preceding para.

11. **Annex 3** gives many examples of the kind of non herbal ingredients which might be found in unlicensed traditional ethnic medicines traded on international markets. Such products would not meet the requirements of Section 12 and medicines containing these ingredients would need a product licence.

RESTRICTIONS ON SPECIFIC INGREDIENTS

12. **Annex 2** contains a consolidated list of herbal ingredients that are restricted in medicines. Business should ensure they are aware of any specific restrictions or prohibitions which apply to any particular ingredients:

- The Medicines (*Aristolochia* and Mu Tong etc.) (Prohibition) Order 2001 prohibits in unlicensed medicines *Aristolochia* and a number of other herbal ingredients which can be confused with the toxic herbal ingredient *Aristolochia*. **Annex 1** lists the prohibited ingredients in this Order, and they also included in Annex 2.
- in the UK, certain potent plants are restricted to use by medical practitioners by the Prescription Only Medicines (Products Other than Veterinary Drugs) Order 1997 (e.g. Digitalis, Nux Vomica (Strychnos), Aconite, Croton Seed, Rauwolfia). Herbal substances which are POM are included in **Annex 2**. (A consolidated list of POM substances – including the many non herbal substances – is set out elsewhere on the MCA website, www.mca.gov.uk, See section on Licensing of Medicines: Legal Status and Reclassification of Medicines)
- herbal remedies containing other potentially hazardous ingredients listed in Part I of the Schedule to The Medicines (Retail Sale or Supply of Herbal Remedies) Order 1977 are restricted to sale only through registered pharmacies. Herbal remedies containing ingredients listed in Parts II and III of the Schedule may only be supplied to the public in restricted circumstances, in particular where there has been a one to one consultation, and are subject to specified controls on dose and route of administration. **Annex 2** includes herbal ingredients in this Order.

13. Please note that these lists do not constitute legal documents. They, and this guidance, have been designed as an aide for those working in the field of herbal medicines and should always be used with reference to the relevant legislation. Whilst every effort has been made to ensure the accuracy of the information presented in this document, the authors do not accept legal responsibility for any errors or omissions that have been made.

14. To illustrate the issue of problem which arose with a specific ingredients, the MCA identified examples of manufactured TCMS (a product named Xiaoke Wan) which included the oral hypoglycaemic agent glibenclamide as a listed ingredient. Glibenclamide is restricted as a POM ingredient. Moreover, a product containing such a non herbal ingredient could not in any case legally be sold as an unlicensed herbal remedy. A 58 year old woman suffered hypoglycaemic coma following the use of such a remedy.

USE OF PHARMACOPOEIA FROM NON WESTERN TRADITIONS

15. **It should not be assumed that formulae and products included in a pharmacopoeia from a non western tradition are legal in unlicensed medicines in the UK.**

16. **Annex 4** taken from the Chinese Pharmacopoeia shows products containing ingredients which would be illegal, or restricted, in unlicensed medicines. This list is not intended to be comprehensive but serves as a reminder of the need to check every ingredient in a formula. The examples included in the annex are:

- Realgar (a mineral of sulphides containing mainly arsenic disulphide)
- Cinnabaris (a mineral of sulphides mainly mercuric sulphide),
- Calomelas (mercurous chloride)
- Hydrargyri Oxydum Rubrum (red mercuric oxide).

None of these ingredients would be legal in unlicensed medicines.

The annex also lists examples of products containing

- Aconite for internal use

Aconite for internal use is a POM substance.

REVISION OF TRADITIONAL FORMULA TO REMOVE DANGEROUS OR ILLEGAL INGREDIENTS

17. The MCA has been informed on occasions that a particular product may have been reformulated to remove a known illegal or dangerous ingredient so as to make it acceptable for the UK market. Unless the product has come through a secure supply chain and has been produced to Good Manufacturing Practice standards in controlled conditions it may be unwise simply to rely on assurances that the problem ingredient is not present. In the absence of reliable quality assurance, even if a sampling exercise indicates that products tested are clear of the problem ingredient this is no guarantee that the product will always be safe and legal.

18. Two examples illustrate this problem:

- the MCA became aware of an attempt to reformulate Longdan Xiegan Wan, a product in the Chinese Pharmacopoeia, to remove a dangerous ingredient, *Aristolochia*. However, one sample of the product “New” Longdan Xiegan Wan proved, on testing by the Agency, to contain aristolochic acid

- in the Chinese Pharmacopoeia Shugan Wan contains Cinnabaris (a mineral of sulphides mainly mercuric sulphide). The MCA was informed recently by companies that a version of the product was now being supplied for the western market without this particular ingredient. However, testing of samples indicated that there were still Shugan Wan products on the UK market containing Cinnabaris.

QUALITY AND SAFETY OF HERBAL REMEDIES SOLD UNDER SECTION 12

19. Controlled, high quality, manufacturing conditions, including authentication of ingredients, are essential to the production of safe, high quality herbal medicines. While there are currently no *specific* quality or safety regulatory requirements applying to Section 12 products, it is important to appreciate that poor quality, unsafe medicines are likely to be illegal under more general legal safeguards. For example, Section 64 of the 1968 Medicines Act provides that no person shall, to the prejudice of the purchaser, sell any medicinal product which is not of the nature or quality demanded by the purchaser. In addition, where quality controls are not adequately applied there is also a clear risk that this may contribute to non compliance with the law in some of the ways outlined elsewhere in this note.

UPDATING

20. This note is placed on the MCA's web site, at www.mca.gov.uk (within the section *Policy on herbal medicines*) and will be updated as new information becomes available.

Medicines Control Agency
November 2001

RESTRICTIONS ON ARISTOLOCHIA AND HERBAL INGREDIENTS WHICH MAY BE CONFUSED WITH ARISTOLOCHIA

1. The sale, supply and importation of unlicensed medicines for human use is prohibited if the medicine contains any species of the genus:

Aristolochia

2. The sale, supply and importation of unlicensed medicines for human use is prohibited if the medicine contains, or is presented as containing:

Akebia quinata
Akebia trifoliata
Clematis armandii
Clematis montana
Cocculus laurifolius
Cocculus orbiculatus
Cocculus trilobus
Stephania tetrandra.

3. The sale, supply and importation of unlicensed medicines for human use is prohibited if the medicine is presented as containing:

Mu Tong (*Aristolochia manshuriensis*, stem)
Fang Ji (*Aristolochia fangch*, root)

4. The following are common, or pin yin, names for ingredients and in Chinese Tradition may include *Aristolochia* species:

Ma Dou Ling (*Aristolochia contorta*, *Aristolochia debilis*, fruit)
Tian Xian Teng (*Aristolochia contorta*, *Aristolochia debilis*, herb)
Qing Mu Xiang (*Aristolochia debilis*, root)

An unlicensed medicine would not currently be illegal simply by virtue of declaring, e.g. Ma Dou Ling, as an ingredient. However, such a medicine would be covered by the prohibition if the Ma Dou Ling (or any other ingredient of the product) consisted wholly or partly of any *Aristolochia* species.

5. The following table is derived from the Traditional Chinese Patent Medicines listed in the Pharmacopoeia of the People's Republic of China (English edition 1997). The list indicates those products which contain as ingredients *Aristolochia* species. Any of these products containing *Aristolochia* species could not be legally sold in the UK as unlicensed medicines.

PRODUCT	ARISTOLOCHIA INGREDIENT
Anyang Jigzhi Gao	<i>Caulis Aristolochia manshuriensis</i>
Chunyang Zhengqi Wan	<i>Aristolochia Radix</i>
Dahuang Qingwei Wan	<i>Caulis Aristolochia manshuriensis</i>
Daochi Wan	<i>Caulis Aristolochia manshuriensis</i>
Ershiwuwei Songshi Wan	<i>Fructus Aristolochiae</i>
Fenqing Wulin Wan	<i>Caulis Aristolochia manshuriensis</i>
Fuke Fenqing Wan	<i>Caulis Aristolochia manshuriensis</i>
Guanxin Suhe Wan	<i>Aristolochia Radix</i>
Longdan Xiegan Wan (Damiwan)	<i>Caulis Aristolochia manshuriensis</i>
Longdan Xiegan Wan	<i>Caulis Aristolochia manshuriensis</i>
Shixiang Fansheng Wan	<i>Aristolochia Radix</i>
Xiao'er Jindan Pian	<i>Caulis Aristolochia manshuriensis</i>
Zhisou Huatan Wan	<i>Fructus Aristolochiae</i>

LIST OF HERBAL INGREDIENTS WHICH ARE PROHIBITED OR RESTRICTED IN MEDICINES

The table below provides, for convenience, a consolidated and alphabetical list of herbal ingredients which are subject to various restrictions. Some herbal ingredients are subject to more than one set of restrictions.

LEGAL PROVISION	MAIN EFFECT
The Medicines (Aristolochia and Mu Tong etc.) (Prohibition) Order 2001 SI 1841	Not permissible to manufacture, import, sell or supply any unlicensed medicine in the UK which contains the named herbal ingredients. (See Annex 1 which explains in more detail the provisions relating to all Aristolochia and ingredients at risk of confusion with Aristolochia species)
The Prescription Only Medicines (Human Use) Order 1997 ² SI 1830	Prescription only medicines (POMs) can only be made available via a prescription from a registered doctor or dentist.
The Medicines (Retail Sale or Supply of Herbal Remedies) Order 1977 SI 2130 – Part I	Prohibits the sale or supply (including general retail or following a one-to-one consultation with a practitioner) of herbal medicines in the UK if it contains one or more of the listed plants, except where sold in premises which are registered pharmacies and by or under the supervision of a pharmacist.
The Medicines (Retail Sale or Supply of Herbal Remedies) Order 1977 SI 2130 – Part II & III	Plants listed in Part II of SI 2130 can only be sold in herbal medicines following a one-to-one consultation with a practitioner, at the dosages and by the route of administration specified in Part III. If the dosage specified is exceeded or if the route of administration differs from that specified, the herbal medicines containing these plants can only be supplied in premises which are registered pharmacies and by or under the supervision of a pharmacist

² (SI 1997/1830), updated in line with the subsequent amendment Orders (SI 1997/2044; SI 1998/108; SI 1998/1178; SI 1998/2081; SI 1999/1044; SI 1999/3463; SI 2000/1917; SI 2000/2899; SI 2000/3231)

Botanical name	Synonym	Legal category	Maximum dose where permitted:	
			FOR INTERNAL USE ONLY	FOR EXTERNAL USE ONLY
			Max dose (MD) ² , max daily dose (MDD) ³	Percentage (%)
All <i>Aconitum</i> species including: <i>Aconitum napellus</i> <i>Aconitum stoerkianum</i> <i>Aconitum uncinatum var japonicum</i> <i>Aconitum deinorrhizum</i> <i>Aconitum balfourni</i> <i>Aconitum chasmanthum</i> <i>Aconitum spicatum</i> <i>Aconitum lycoctonum</i>	Aconite	POM and SI 2130 – Parts II & III	No permitted dose unless made available by a prescription from a registered doctor or dentist.	1.3 % or below
<i>Adonis vernalis</i>	False Hellebore; Yellow Pheasant's Eye	SI 2130 – Parts II & III	100 mg (MD), 300 mg (MDD)	No dose permitted
<i>Akebia quinata</i> <i>Akebia trifoliata</i>	Mu tong	SI 1841	Prohibited in <i>all</i> unlicensed medicines	
<i>Apocynum cannabinum</i>	Canadian Hemp; Dogbane; Black Indian Hemp	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Areca catechu</i>	Areca; Betel Nut	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Artemisia cina</i>	Santonica	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Aristolochia</i> <i>Aristolochia clematis</i> <i>Aristolochia contorta</i> <i>Aristolochia debelis</i> <i>Aristolochia fang-chi</i> <i>Aristolochia manshuriensis</i> <i>Aristolochia serpentaria</i>	Mu tong; Fangji; Birthwort; Long Birthwort; Indian Birthwort	POM	No permitted dose unless made available by a prescription from a registered doctor or dentist.	

² 'Maximum dose' or 'MD' means the maximum quantity of the substance contained in the amount of the medicinal product for internal use which it is recommended should be taken or administered at any one time

³ 'Maximum daily dose' or 'MDD' means the maximum quantity of the substance contained in the amount of the medicinal product for internal use which it is recommended should be taken or administered in any period of 24 hours

Botanical name	Synonym	Legal category	Maximum dose where permitted:	
			FOR INTERNAL USE ONLY	FOR EXTERNAL USE ONLY
			Max dose (MD) ² , max daily dose (MDD) ³	Percentage (%)
<i>Aristolochia</i> <i>Aristolochia clematis</i> <i>Aristolochia contorta</i> <i>Aristolochia debelis</i> <i>Aristolochia fang-chi</i> <i>Aristolochia manshuriensis</i> <i>Aristolochia serpentaria</i>	Mu tong; Fangji; Birthwort; Long Birthwort; Indian Birthwort	SI 1841	Prohibited in <i>all</i> unlicensed medicines	
<i>Atropa belladonna</i> – herb <i>Atropa acuminata</i> – herb	Belladonna herb; Deadly Nightshade; Dwale	SI 2130- Parts II & III	50 mg (MD), 150 mg (MDD)	Can only be sold in premises which are registered pharmacies <i>and</i> by or under the supervision of a pharmacist
<i>Atropa belladonna</i> - root <i>Atropa acuminata</i> – root	Belladonna root; Deadly Nightshade, Dwale	SI 2130 – Parts II & III	30 mg (MD), 90 mg (MDD)	Can only be sold in premises which are registered pharmacies <i>and</i> by or under the supervision of a pharmacist
<i>Aspidosperma quebracho-blanco</i>	White Quebracho	SI 2130- Part II & III	50 mg (MD), 150 mg (MDD)	Can only be sold in premises which are registered pharmacies <i>and</i> by or under the supervision of a pharmacist
<i>Brayera anthelmintica</i>	Koussou	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Catha edulis</i>	Catha; Khat	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Chelidonium majus</i>	Greater Celandine	SI 2130 –Part II & III	2 g (MD), 6 g (MDD)	Can only be sold in premises which are registered pharmacies <i>and</i> by or under the supervision of a pharmacist
<i>Chenopodium ambrosioides var anthelminticum</i>	Chenopodium; Wormseed; American Wormseed	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	

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³ 'Maximum daily dose' or 'MDD' means the maximum quantity of the substance contained in the amount of the medicinal product for internal use which it is recommended should be taken or administered in any period of 24 hours

Botanical name	Synonym	Legal category	Maximum dose where permitted:	
			FOR INTERNAL USE ONLY	FOR EXTERNAL USE ONLY
			Max dose (MD) ² , max daily dose (MDD) ³	Percentage (%)
<i>Cinchona calisaya</i> <i>Cinchona ledgerana</i> <i>Cinchona officinalis</i> <i>Cinchona succirubra</i> <i>Cinchona micrantha</i>	Cinchona bark; Peruvian Bark; Jesuit's Bark; Red Cinchona; Yellow Cinchona	SI 2130 – Part II & III	250 mg (MD), 750 mg (MDD)	Can only be sold in premises which are registered pharmacies <i>and</i> by or under the supervision of a pharmacist
<i>Clematis armandii</i> <i>Clematis montana</i>	Mu tong	SI 1841	Not permitted in <i>any</i> unlicensed medicines	
<i>Claviceps purpurea</i>	Ergot, prepared Ergot of Rye; Smut of Rye; Spurred Rye; Secale comutum	POM	Can only be made available by a prescription from a registered doctor or dentist.	
<i>Cocculus indicus</i>		POM	Can only be made available by a prescription from a registered doctor or dentist.	
<i>Cocculus laurifolius</i> <i>Cocculus orbiculatus</i> <i>Cocculus trilobus</i>	Fangji	SI 1841	Not permitted in <i>any</i> unlicensed medicines	
<i>Colchicum autumnale</i>	Colchicum corn; Meadow Saffron	SI 2130 – Part II & III	100 mg (MD), 300 mg (MDD)	Can only be sold in premises which are registered pharmacies <i>and</i> by or under the supervision of a pharmacist
<i>Conium maculatum</i>	Conium leaf; Hemlock leaf; Conium fruits; Hemlock fruits	POM <i>and</i> SI 2130 – Parts II & III	No permitted dose unless made available by a prescription from a registered doctor or dentist.	7.0 % or below
<i>Convallaria majalis</i>	Lily of the Valley; May Lily; Muguet	SI 2130-Parts II & III	150 mg (MD), 450 mg (MDD)	Can only be sold in premises which are registered pharmacies <i>and</i> by or under the supervision of a pharmacist

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³ 'Maximum daily dose' or 'MDD' means the maximum quantity of the substance contained in the amount of the medicinal product for internal use which it is recommended should be taken or administered in any period of 24 hours

Botanical name	Synonym	Legal category	Maximum dose where permitted:	
			FOR INTERNAL USE ONLY Max dose (MD) ² , max daily dose (MDD) ³	FOR EXTERNAL USE ONLY Percentage (%)
<i>Crotalaria berberoana</i>	Crotalaria fulva	2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Crotalaria spectabilis</i>	Crotalaria spect	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Datura stramonium</i> <i>Datura innoxia</i>	Stramonium; Thornapple; Jimson Weed; Jamestown Weed	SI 2130- Parts II & III	50 mg (MD), 150 mg (MDD)	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist
<i>Delphinium staphisagria</i>	Stavesacre seeds	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Digitalis leaf</i> <i>Digitalis prepared</i>	Foxglove	POM	Can only be made available via a prescription from a registered doctor or dentist.	
<i>Dryopteris filix-mas</i>	Male fern; Buckler Fern; Aspidium filix-mas	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Duboisia myoporoides</i> <i>Duboisia leichardtii</i>	Duboisia; Corkwood; Cork Tree; Eyeplant	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Ecballium elaterium</i>	Elaterium; Squirting Cucumber; Momordica elateria	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Embelia ribes</i> <i>Embelia robusta</i>	Embelia	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	

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³ 'Maximum daily dose' or 'MDD' means the maximum quantity of the substance contained in the amount of the medicinal product for internal use which it is recommended should be taken or administered in any period of 24 hours

Botanical name	Synonym	Legal category	Maximum dose where permitted:	
			FOR INTERNAL USE ONLY	FOR EXTERNAL USE ONLY
			Max dose (MD) ² , max daily dose (MDD) ³	Percentage (%)
<i>Ephedra sinica</i> <i>Ephedra equisetina</i> <i>Ephedra distachya</i> <i>Ephedra intermedia</i> <i>Ephedra gerardiana</i>	Ma Huang	SI 2130 – Parts II & III	600 mg (MD), 1800 mg (MDD)	Can only be sold in premises which are registered pharmacies <i>and</i> by or under the supervision of a pharmacist
<i>Erysimum canescens</i>	Erysimum	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Gelsemium sempervirens</i>	Yellow Jasmine; Wild Jasmine; Yellow Jessamine; Wild Jessamine; Wild Woodbine	SI 2130 – Parts II & III	25 mg (MD), 75 mg (MDD)	Can only be sold in premises which are registered pharmacies <i>and</i> by or under the supervision of a pharmacist
<i>Holarrhena antidysenterica</i>	Holarrhena	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Hyoscyamus niger</i> <i>Hyoscyamus albus</i> <i>Hyoscyamus muticus</i>	Henbane	SI 2130 – Parts II & III	100 mg (MD), 300 mg (MDD)	Can only be sold in premises which are registered pharmacies <i>and</i> by or under the supervision of a pharmacist
<i>Juniperus sabina</i>	Savin	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Lobelia inflata</i>	Indian Tobacco; Pukeweed	SI 2130 – Parts II & III	200 mg (MD), 600 (MDD)	Can only be sold in premises which are registered pharmacies <i>and</i> by or under the supervision of a pharmacist

² 'Maximum dose' or 'MD' means the maximum quantity of the substance contained in the amount of the medicinal product for internal use which it is recommended should be taken or administered at any one time

³ 'Maximum daily dose' or 'MDD' means the maximum quantity of the substance contained in the amount of the medicinal product for internal use which it is recommended should be taken or administered in any period of 24 hours

Botanical name	Synonym	Legal category	Maximum dose where permitted:	
			FOR INTERNAL USE ONLY	FOR EXTERNAL USE ONLY
			Max dose (MD) ² , max daily dose (MDD) ³	Percentage (%)
<i>Mallotus philippinensis</i>	Kamala; Kameela; Rottlera tinctoria	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Mandragora autumnalis</i>	Mandrake	POM	Can only be made available via a prescription from a registered doctor or dentist.	
<i>Papaver somniferum</i>	Poppy capsule	POM	Can only be made available via a prescription from a registered doctor or dentist.	
<i>Pausinystalia yohimbe</i>	Yohimbe bark	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Pilocarpus jaborandi</i> <i>Pilocarpus microphyllus</i>	Jaborandi; Maranham Jaborandi; Pernambuco Jaborandi	SI 2130- Parts II & III	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist.	5.0 % or below
<i>Podophyllum</i>	May Apple; Devil's Apple; Wild Lemon; Indian Podophyllum	POM	Can only be made available via a prescription from a registered doctor or dentist.	
<i>Podophyllum indian</i>	May Apple; Devil's Apple; Wild Lemon; Indian Podophyllum	POM	Can only be made available via a prescription from a registered doctor or dentist.	
<i>Podophyllum resin</i>	May Apple; Devil's Apple; Wild Lemon; Indian Podophyllum	POM	Can only be made available via a prescription from a registered doctor, nurse or dentist.	20 % or below
<i>Punica granatum</i>	Pomegranate Bark	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Rauwolfia serpentina</i>	Rauwolfia; serpentwood; Indian snakeroot	POM	Can only be made available via a prescription from a registered doctor or dentist.	

² 'Maximum dose' or 'MD' means the maximum quantity of the substance contained in the amount of the medicinal product for internal use which it is recommended should be taken or administered at any one time

³ 'Maximum daily dose' or 'MDD' means the maximum quantity of the substance contained in the amount of the medicinal product for internal use which it is recommended should be taken or administered in any period of 24 hours

Botanical name	Synonym	Legal category	Maximum dose where permitted:	
			FOR INTERNAL USE ONLY Max dose (MD) ² , max daily dose (MDD) ³	FOR EXTERNAL USE ONLY Percentage (%)
<i>Rauwolfia vomitoria</i>	African serpentwood	POM	Can only be made available via a prescription from a registered doctor or dentist.	
<i>Rhus radicans</i>	Poison Ivy	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Rhus toxicodendron</i>	Poison Oak	SI 2130 – Parts II & II	Can only be sold in premises which are registered pharmacies <i>and</i> by or under the supervision of a pharmacist.	10.0 % or below
<i>Schoenocaulon officinale</i>	Sabadilla; Cevadilla	POM	Can only be made available via a prescription from a registered doctor or dentist.	
<i>Scopolia carniolica</i> <i>Scopolia japonica</i>	Scopolia	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Senecio jacobaea</i>	Ragwort; Common Ragwort; Tansy Ragwort	SI 2130 -Parts II & III	Can only be sold in premises which are registered pharmacies <i>and</i> by or under the supervision of a pharmacist	10.0 % or below
<i>Stephania tetrandra</i>	Fangji	SI 1841	Not permitted in <i>any</i> unlicensed medicines	
<i>Strophanthus kombe</i> <i>Strophanthus courmonti</i> <i>Strophanthus nicholsoni</i> <i>Strophanthus gratus</i> <i>Strophanthus emini</i> <i>Strophanthus sarmentosus</i> <i>Strophanthus hispidus</i>		SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	

² 'Maximum dose' or 'MD' means the maximum quantity of the substance contained in the amount of the medicinal product for internal use which it is recommended should be taken or administered at any one time

³ 'Maximum daily dose' or 'MDD' means the maximum quantity of the substance contained in the amount of the medicinal product for internal use which it is recommended should be taken or administered in any period of 24 hours

Botanical name	Synonym	Legal category	Maximum dose where permitted:	
			FOR INTERNAL USE ONLY Max dose (MD) ² , max daily dose (MDD) ³	FOR EXTERNAL USE ONLY Percentage (%)
<i>Strychnos ignatii; S. cuspida</i>	Ignatius bean	POM	Can only be made available via a prescription from a registered doctor or dentist.	
<i>Strychnos nux vomica seed</i>	Nux vomica seed; Poison Nut	POM	Can only be made available via a prescription from a registered doctor or dentist.	
<i>Ulmus fulva</i> <i>Ulmus rubra</i>	Slippery Elm/ Red Elm Bark (whole/ not powdered)	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	
<i>Veratrum viride, green</i>	Hellebore American; Green Hellebore; American Veratrum; Indian Poke	POM	Can only be made available via a prescription from a registered doctor or dentist.	
<i>Veratrum album, white</i>	White Hellebore	POM	Can only be made available via a prescription from a registered doctor or dentist.	
<i>Viscum album</i>	Mistletoe berry; European mistletoe; Birdlime mistletoe	SI 2130 – Part I	Can only be sold in premises which are registered pharmacies and by or under the supervision of a pharmacist	

² 'Maximum dose' or 'MD' means the maximum quantity of the substance contained in the amount of the medicinal product for internal use which it is recommended should be taken or administered at any one time

³ 'Maximum daily dose' or 'MDD' means the maximum quantity of the substance contained in the amount of the medicinal product for internal use which it is recommended should be taken or administered in any period of 24 hours

EXAMPLE OF NON HERBAL INGREDIENTS IN TRADITIONAL ETHNIC MEDICINES

These tables, compiled with help of trade associations, lists ingredients which may feature in the international trade in traditional medicines. **However, these ingredients could not legally be included in an unlicensed herbal remedy.** In some cases, restrictions under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) could also apply. The tables are categorised into **a)** mineral and **b)** animal ingredients.

a. mineral

'Botanical' name	Pharmaceutical	English	Pin Yin
Actinolite	Actinolitum		Yang Qi Shi
Alum	Alum	Potash	Ming Fan
Amber	Succinum	Amber	Hu Po
Arsenic Sulphide	Realgar	Arsenic sulphide	Xiong Huang
Calcitum	Calcitum		Han Shui Shi
Calcium Sulphate	Gypsum		Shi Gao
Calcium Sulphite	Gypsum		Shi Gao
Cinnabar	Cinnabaris	Mercuric sulphide	Zhu Sha
Fluorite	Fluoritum		Zi Shi Ying
Halloysite	Halloysitum Rubrum	Silicates (largely aluminium silicates)	Chi Shi Zhi
Lead oxide	Lithargyrum	Lead oxide	Mi Tuo Seng
Mercurous Chloride	Calomelas	Chloride salt of mercury	Qing Fen
Pumice		Pumice stone	Fu Hai Shi
Pyrite	Pyritum		Zi Ran Tong
Red lead oxide			
Smithsonite	Smithsonitum		Lu Gan Shi
Sodium sulphate	Mirabilatum		Mang Xiao
Sodium tetraborate	Borax		Peng Sha
Stalactite	Stalactitum	Fossilised stalactite	E Guan Shi
Sulphur	Sulphur		Liu Huang
Talcum	Talcum	Talc	Hua Shi

b. animal

'Botanical' name	Pharmaceutical	English	Pin Yin
<i>Allolobophora caliginosa trap</i>	Lumbricus	Dried earthworm	Di Long
<i>Amyda sinensis</i>	Carapax Amyd	Tortoise shell	Bei Jia
<i>Arca granosa</i>	Concha Arcae	Ark shell	Wa Leng Zi
<i>Arca inflata</i>	Concha Arcae		
<i>Arca subcrenata</i>	Concha Arcae		
Bombyx mori - Can Sha	Excrementum Bombycis Mori	Silkworm faeces	Can Sha
<i>Bubalus bubalis</i>	Cornu Bubali	Buffalo horn shavings	Shu Iniu Jiao
<i>Callorhinus ursinus</i>	Testes et Penis Otoriae	Testicles and penis of bear	Hai Gou Shen
<i>Carapax Trionycis</i>		Turtle shell	Biejia
<i>Cervus elaphus</i>	Cornu Cervi Parvum	Young hairy Antler of male red deer	Lu Rong
<i>Cervus nippon</i>	Cornu Cervi Parvum	Young hairy Antler of male sika deer	Lu Rong
<i>Cryptotympana atrata</i>	Periostracum Cicadae	The shed cuticle of the Cicada.	Chan Tui
<i>Elphe carinata</i>	Periostracum Serpentis	Dried epidermal membrane of snake	She Tui
<i>Elphe taeniurus</i>	Periostracum Serpentis	Dried epidermal membrane snake	She Tui
<i>Equus asinus</i>	Gelatinum Asini		E Jiao
<i>Bombyx mori</i>	Excrementum Bombycis Mori	Silkworm faeces	Can Sha
<i>Fossilised bone</i>	Os Draconis	Fossilised bone	Long Gu
<i>Fossilised teeth</i>	Dens Draconis	Fossilised teeth	Long Chi
<i>Gallus gallus domesticus</i>	Endithelium Corneum Gigeriae Galli	Gizzard lining	Ji Nei Jin
<i>Gecko gecko</i>	Gecko	Dried body of gecko	Ge Jie
<i>Gecko verticillatus</i>	Gecko	Dried body of gecko	Ge Jie

'Botanical' name	Pharmaceutical	English	Pin Yin
<i>Haliotis diversicolor</i>	Concha Haliotidis	Abalone shell (Sea Ear Shell)	Shi Jue Ming
<i>Haliotis gigantea discus</i>	Concha Haliotidis		
<i>Hierodula patellifera</i>	Ootheca Mantidis	Mantis egg case	Sang Piao Xiao
<i>Hippocampus histrix</i>	Hippocampus	Sea horse	Hai Ma
<i>Hippocampus japonicus</i>	Hippocampus		
<i>Hippocampus kellogii</i>	Hippocampus		
<i>Hippocampus kuda</i>	Hippocampus		
<i>Hippocampus trimacullatus</i>	Hippocampus		
<i>Hirudo nipponia</i>	Hirudo seu Whi	Leech	Shui Zhi
<i>Human placenta</i>	Placenta Hominus	Human placenta/ after birth	Zi He Che
<i>Manis pentadactyla</i>	Squama Manitis Pentadactylae	Dried scales of scaly anteater (also known as the Pangolin)	Chuan Shan Jia
<i>Margaritifera concha</i>	Concha margaritifera usta	Mother-of-pearl/ fresh water clam shell	Zhen Zhu Mu
<i>Notarchus leachii</i>		Leach	Hai Fen
<i>Ostrea gigas</i>	Concha Ostrea	Oyster shell	Mu Li
<i>Ostrea rivularis</i>	Concha Ostrea		
<i>Ostrea talienwhanensis</i>	Concha Ostrea		
<i>Periostracum Cicadae</i>	Cryptotympana	The shed cuticle of the ciccada.	Chan Tui
<i>Periostracum Serpentina</i>		Dried epidermal membrane snake	
<i>Phoco vitulina</i>	Testes et Penis Otoriae	Calf testicles and penis	Hai Gou Shen
<i>Pteria margaritifera</i>	Magarita	Pearl	Zhen Zhu
<i>Pteria martensii</i>			
<i>Rhinoceros bicornis</i>	Cornu Rhinoceri	Rhino horn	Xi Jiao
<i>Rhinoceros sinus</i>			
<i>Rhinoceros sondaicus</i>			
<i>Rhinoceros sumatrensis</i>			
<i>Rhinoceros unicornis</i>			
<i>Saiga tatarica</i>	Cornu Antelopi	Antelope horn	Ling Yang Jiao
<i>Sepia esculenta</i>	Os Sepiae seu Sepiellae	Cuttlefish bone	Hai Piao Xiao

<i>Sepiella maindroni</i>	Os Sepiae seu Sepiellae	Cuttlefish bone	Hai Piao Xiao
<i>Troglodytes xanthipes</i>	Excrementum Troglodyteri seu Pteromi	Squirrel excrement	Wu Ling Zhi
<i>Ursus arctos</i>	Fel Ursi	Bear's gall	Xiong Dan
<i>Vespertilio murinus</i>	Excrementum Vespertillii Murini	Excrement	Ye Ming Sha
<i>Whitmania acranulata</i>	Hirudo seu Whitmaniae	Leech	Shui Zhi
<i>Whitmania pigra</i>			
<i>Zaocys dhumnades</i>	Zaocys Dhumnades	Black striped snake	Wu Shao She

Annex 4

EXAMPLES OF PRODUCTS FROM THE CHINESE PHARMACOPOEIA WHICH CONTAIN TOXIC OR POTENT INGREDIENTS

The following tables are derived from the Traditional Chinese Patent Medicines listed in the Pharmacopoeia of the People's Republic of China (English edition 1997).

A. Toxic heavy metals and toxic elements

The table includes products containing the following known toxic substances, which are not permitted in unlicensed herbal remedies:

Realgar	a mineral of sulphides containing mainly arsenic disulphide
Cinnabaris	a mineral of sulphides mainly mercuric sulphide
Calomelas	mercurous chloride (Hg ₂ Cl ₂)
Hydrargyri Oxydum Rubrum	red mercuric oxide (HgO)

Product Name	Toxic substance
Angong Niuhuang San	Cinnabaris, Realgar
Angong Niuhuang Wan	Cinnabaris, Realgar
Baochi San	Cinnabaris
Baolong Wan	Cinnabaris
Bingpen San	Cinnabaris
Biwen San	Cinnabaris
Bushen Yinao Pian	Cinnabaris
Chunyang Zhengqi Wan	Cinnabaris, Realgar (also contains <i>Aristolochia Radix</i>)
Ershiwuwei Shanhu Wan	Cinnabaris
Ershiwuwei Songshi Wan	Cinnabaris
Hongling San	Cinnabaris, Realgar
Jiusheng San	Calomelas Hydrargyri Oxydum Rubrum
Jiuyi San	Hydrargyri Oxydum Rubrum
Jufang Zhibao San	Cinnabaris, Realgar
Meihua Dianshe Wan	Cinnabaris, Realgar

Niuhuang Baolong Wan	Cinnabaris, Realgar
Niuhuang Jiedu Pian	Realgar
Niuhuang Jiedu Wan	Realgar
Niuhuang Qianjin San	Cinnabaris
Niuhuang Qingxin Wan	Cinnabaris, Realgar
Niuhuang Zhenjing Wan	Cinnabaris, Realgar
Pinggan Shuluo Wan	Cinnabaris
Qili San	Cinnabaris
Qizhen Wan	Cinnabaris, Realgar
Renqing Changjue	Cinnabaris
Renqing Mangjue	Cinnabaris
Shayao	Cinnabaris, Realgar
Shixiang Fansheng Wan	Cinnabaris (also contains <i>Aristolochia Radix</i>)
Shugan Wan	Cinnabaris
Shuzheng Pian	Cinnabaris, Realgar
Suhexiang Wan	Realgar
Tianwang Buxin Wan	Cinnabaris
Wanshi Niuhuang Qingxin Wan	Cinnabaris
Xiangsu Zhengwei Wan	Cinnabaris
Xiao'er Baishou Wan	Cinnabaris
Xiao'er Huadu San	Realgar
Xiao'er Jindan Pian	Cinnabaris (also contains <i>Aristolochia manshuriensis</i>)
Xiao'er Jingfeng San	Cinnabaris, Realgar
Xiao'er Qingre Pian	Cinnabaris, Realgar
Xiao'er Zhibao Wan	Cinnabaris, Realgar
Yatong Yili Wan	Cinnabaris, Realgar
Yinianjin	Cinnabaris
Yixian Wan	Cinnabaris, Realgar
Yiyuan San	Cinnabaris

Zaizao Wan	Cinnabaris
Zhuhuang Chuihou San	Realgar
Zijin Ding	Cinnabaris, Realgar
Zixue	Cinnabaris

B. Patent medicines for internal use containing Aconite species

Aconite for internal use is a Prescription Only Medicine substance.

PRODUCT	ACONITE INGREDIENT
Ershiwuwei Shanhu Wan	Radix Aconiti Kuzuezoiffii
Ershiwuwei Songshi Wan	Radix Aconiti Navicularae
Guifu Dihuang Wan	Radix Aconiti Lateralis Preparata (processed)
Guifu Lizhong Wan	Radix Aconiti Lateralis Preparata (processed)
Jisheng Shenqi Wan	Radix Aconiti Lateralis Preparata (processed)
Mugua Wan	Radix Aconiti Preparata
	Radix Aconiti Kusnezoffii Preparata
Qufeng Shujin Wan	Radix Aconiti Preparata
	Radix Aconiti Kusnezoffii Preparata
Qufeng Zhitong Pian	Radix Aconiti Kusnezoffii Preparata
Sanqi Shangyao Pian	Radix Aconiti Kusnezoffii (steamed)
	Radix Aconiti Brachypodi
Shi'erwei Yishou San	Folium Aconiti Szechenyiani
Shisanwei Bangga San	Herba Aconiti
Sini Tang	Radix Aconiti Lateralis Preparata
Tianma Wan	Radix Aconiti Lateralis (processed)
Wuwei Shexiang Wan	Radix Aconiti Balfourii
Xiaohuoluo Wan	Radix Aconiti Kusnezoffii Preparata
Xiaojin Wan	Radix Aconiti Kusnezoffii Preparata
Yishenling Keli	Radix Aconiti Lateralis Preparata
Zaizao Wan	Radix Aconiti Lateralis Preparata

EXAMPLES OF ANIMAL PARTS WHICH ARE LISTED IN THE CHINESE PHARMACOPOEIA *

ANIMAL PART	
Venenum Bufonis	Toad Venum
Zaocys	Black tail snake
Syngnathus	Pipe Fish
Squama manitis	Pangolin scale
Scolopendra	Centipede
Scorpio	Scorpion
Pulvis Cornus Bubali Concentratus	Condensed Buffalo Horn Powder
Placenta Hominis	Human placenta
Pheretima	Earthworm
Periostracum serpentis	Snake slough
Periostracum cicadae	Cicada slough
Oviductus Ranae	Forest Frog Oviduct
Os sepiae	Cuttlebone
Mylabris	Blister beetle (cantharidin)
Moschus	Musk
Lytta	Cantharis (Spanishfly)
Huechys	Red medicinal cicada (blistering agent)
Hirudo	Leech
Hippocampus	Sea-horse
Crinis carbonisatus	Carbonised human hair
Eupolyphaga seu steleophaga	Ground beetle
Cornu Saigae Tataricae	Antelope horn
Carapax Trionycis	Turtle Shell
Carapax et Plastrum Testudinis	Tortoise Shell
Calculus Bovis	Dried gallstone of cow
Bungarus Parvus	Coin like White banded Snake
Aspongopus	Stink Bug
Agkistron	Long noded Pit Viper

*Listed in the Chinese Pharmacopoeia 1997

LIST OF TRADE AND PRACTITIONER ASSOCIATIONS

Organisation	Role of organisation	Contact details for further information
The Association of Traditional Chinese Medicine UK (ATCM)	A professional and academic body founded by traditional Chinese Medicine Practitioners in the UK.	ATCM PO Box 1136 Headington D.O. OX3 8XP Tel: 07904 150127 Website: www.atcmuk.org
Ayurvedic Medical Association UK	To promote a register of Qualified Ayurvedic Medical Practitioners and the Ayurvedic Medical System by seminars and information leaflets. To protect the public from unqualified persons and warn the public about unsuitable products.	General Secretary Ayurvedic Medical Association UK 59 Dulverton Road South Croydon Surrey CR2 8PJ Tel.: 020 8682 3876 Fax.: 020 8333 7904 Email: drmoorthy@amservice.com
Ayurvedic Trade Association (ATA)	To ensure the safety and quality of its members Ayurvedic products by establishing standards of quality and good manufacturing practice.	David Whitley Tel: 01695 51015 Fax: 01695 50917 Sangeep Garg Tel: 0207 706 0070 Fax: 0207 706 0060
The British Association of Accredited Ayurvedic Practitioners (BAAAP)	To promote Ayurveda in a correct and ethical manner; to ensure that courses offering qualifications in Ayurveda meet minimum standards.	Dr Deepika Gunawant 2 nd Floor The Devonshire Nursing Centre Ravenscourt Gardens

		London W6 0AE
Organisation	Role of organisation	Contact details for further information
The Chinese Medicine Association of Suppliers (CMAS)	CMAS is a professional self-regulating organisation to ensure safe, quality and CITES compliant traditional Chinese medicine products to practitioners in the UK.	Dr Henry Lee Chair of CMAS 8 th Floor 87-90 Albert Embankment London SE1 7UD Tel: 020 8411 6186 Email: H.Lee@mdx.ac.uk
Chinese Medical Institute and Register (CMIR)	To integrate Chinese medicine and acupuncture with mainstream healthcare. Organises courses and maintains a register of practitioners who hold a Diploma in Chinese medicine and acupuncture.	Professor M. F. Mei CMIR 101-105 Camden High Street London NW1 7JN Tel: 020 7388 5783 Fax: 020 7383 3999 Email: mfm@acumedic.com Website: www.chinesemedicine.org.uk
Register of Chinese Herbal Medicine (RCHM)	To self-regulate and represent professional practitioners of Chinese herbal medicine in the UK.	The RCHM Office Office 5, Ferndale Business Centre 1 Exeter Street Norwich Tel: 01603 623994 Fax: 01603 667557 Email: herbmed@rchm.co.uk
The Trade Association for Producers and Suppliers of Ayurvedic Products from India (TAPASI)	To advise members on herbal medical regulatory issues, facilitate industry self-regulation and ensure UK practitioners and the public have access to safe and high quality Ayurvedic medicines.	David McAlpine 81 Wimpole Street London W1G 9RG Tel: 020 7224 6070 Fax: 020 7224 6080