



Consultation Outcomes: Prescribed qualifications

In July 2025, the Chinese Medicine Council of New Zealand (The Council) published a consultation document on the prescribed qualifications for entry to the Chinese herbal medicine practitioner and Chinese massage (tuina) practitioner scopes of practice. This included a proposal to revoke accreditation of three prescribed qualifications not currently being provided, and a proposal to prescribe a *new* qualification for entry to the Chinese massage (tuina) practitioner scopes of practice.

This report provides a summary of the key themes of the consultation feedback, and the Council's final decision.

The Council extends its thanks and appreciation to the individuals and groups who provided feedback.

Consultation Overview

Consultation respondents were asked to provide their feedback via email. There were no specific questions provided to submit on.

16 submissions were received, from:

- Acupuncture New Zealand (AcNZ)
- Allied Chinese Medicine Aotearoa New Zealand (ACMANZ)
- NZAW Health Clinic
- New Zealand Acupuncture Standards Authority (NZASA)
- New Zealand College of Chinese Medicine (NZCCM)
- New Zealand Chinese Medicine and Acupuncture Society Inc. (NZCMAS)
- Occupational Therapy Board of New Zealand (OTBNZ)
- Individual Chinese medicine practitioners (9).

Results

The following summarised comments were submitted by respondents:

- To get registered as a TCM herbal practitioner, there is only one option in New Zealand, but it is a short course within a master's program and is expensive and not thorough. There are shortfalls in the current acupuncture programs in New Zealand so I ask that the council consider approving reputable online courses such as <https://www.ich-herbschool.com/> or a similar course to strengthen the knowledge and scope of practice of practitioners in New Zealand.
- We're concerned by the Council's proposal to restrict cervical high-velocity, low-amplitude (HVLA) techniques in the education of Chinese Massage (Tuina) practitioners. We believe that the prohibition would significantly compromise the integrity of TCM manipulation therapy and limit practitioners' clinical effectiveness. Rather than eliminating HVLA techniques, New Zealand should become a leader in developing world-class safety standards for these procedures within

TCM practice. Proposed alternative solutions include: structured training pathways, safety protocols, ongoing monitoring and request for collaborative dialogue.

- I support the requirement for a separate, accredited qualification for registration in the Chinese herbal medicine scope of practice. Tuina is already well integrated into most Chinese medicine programmes and commonly used in practice alongside acupuncture so I don't believe an additional qualification should be required for Tuina if the practitioner has completed a full Chinese medicine programme.
- I support the Council's efforts to ensure high standards of education and public safety. My feedback is that the Council include ACC processes and privacy law, as well as broaden cultural competency to include Pacific and wider Asian health perspectives alongside Te Ao Māori.
- The NZASA, NZCMAS and ACMANZ express strong support for the approval of the *Graduate Certificate in Chinese Medicine (Tuina Massage)* offered by the New Zealand College of Chinese Medicine (NZCCM). It is affordable, time-efficient, and specifically tailored for practitioners already in the field. NZCCM delivers high-quality education and there is also a significant practitioner interest in Tuina training.
- We at the NZCCM support the proposed accreditation of the Graduate Certificate in Chinese Medicine (Tuina Massage) for entry to the Chinese massage (Tuina) practitioner scope of practice. The Site Evaluation Team visit, and evaluation process provided us with confidence that the program meets the required standards for quality, safety, and relevance, and that its graduates will be appropriately prepared to practice Tuina within Aotearoa New Zealand's regulatory environment. The accreditation affirms the role of Tuina massage practitioners as recognised, regulated health professionals and embeds additional college accountability through monitoring, reporting, and adherence to Council requirements.
- As a current NZCCM master's student, I feel as though future Tuina study at this school is a great thing. We need this opportunity and NZCCM is a great place to be able to provide a high-quality course.
- I am writing to express my strong support for the accreditation of the Graduate Certificate of Chinese Medicine (Tuina Massage) offered by the NZCCM. The combination of online theoretical instruction, intensive practical workshops, and clinical training provides the flexibility and depth needed to balance ongoing education with professional commitments.
- I am writing to support the accreditation of the Graduate Certificate in Chinese Medicine (Tuina Massage) at the NZCCM. As a current master's student at the college, this course will strengthen my clinical skills and allow me to use Tuina as a hands-on therapy alongside acupuncture and herbal medicine. This would make my treatments more complete and practical, and help me better meet the needs of patients with pain and musculoskeletal conditions
- The proposed prescribed qualification could be a positive change, as long as the following questions have been addressed:
 - Quality of teaching faculty – Chinese Tuina is a highly complex discipline that requires both deep theoretical knowledge and advanced practical skills. Teaching faculty must possess the expertise and experience necessary to ensure students gain authentic knowledge and develop the competencies required to practise Tuina safely and effectively.
 - Attracting potential students and supporting career pathways – A critical factor for the success of this new qualification will be how effectively it attracts prospective students

and provides them with a clear and sustainable career pathway. Ensuring strong enrolment and ongoing professional opportunities will be central to both the success of the programme itself and the wider success of the proposal.

- A drawback is some practitioners who already possess the necessary knowledge, and skills may be unable to attend the prescribed programme due to time or financial constraints. If such individuals continue to practise outside the CMC framework, it could become difficult to oversee their work or address any issues arising in relation to Chinese Tuina practice. I propose the introduction of an alternative registration pathway that would allow these practitioners to come under the Council's regulation. This would help maintain professional standards while ensuring that talented practitioners are not lost to the community.
- OTBNZ has no view on the Council's proposal to revoke accreditation in three qualifications. OTBNZ does support the Council's proposal to accredit the NZCCM Graduate Certificate in Chinese Medicine (Tuina Massage) provided conditions by the subcommittee are met. There is the concern about the Council's proposed Police vetting approach and caution to ensure what is out in place meets New Zealand legislative requirements, and clarity as to whether the Educator or Regulator has the role in police vetting for ākongā.
- AcNZ agree with the Council's proposal to accredit the programme and approve the Graduate Certificate in Chinese Medicine (Tuina Massage). However, it is not clear in the documentation provided what the academic requirement/s are for this course. As a 6-month FTE graduate course, there would be a pre-requisite for a CM qualification for entry to this course.
- I am writing this letter to express my anticipation and love for the course of graduate certificate in Chinese medicine (Tuina Massage). NZCCM's teaching is rich in clinical experience, and the class content is flexible and diverse, suitable for the learning methods of people in modern society.
- I am writing to support the accreditation of the Graduate Certificate in Chinese Medicine (Tuina Massage) at the New Zealand College of Chinese Medicine. This course will help me improve my hands-on skills and provide patients with more comprehensive care. Combining Tuina with acupuncture and herbal medicine will allow me to address both the root causes and the symptoms of disease in my clinical practice.

Response

Cervical high-velocity, low-amplitude (HVLA) techniques

The Council is not proposing to restrict cervical high-velocity, low-amplitude (HVLA) techniques, this activity is already restricted by law. Chinese medicine practitioners, with training and competency in the techniques and knowledge about the prerequisite testing and safe practice, are entitled to perform cervical manipulation. What is noted in the consultation is the Council's requirement that Chinese medicine students be made aware that this is an activity restricted by law and that should they perform these techniques they must do so in accordance with the Council's *Statement on Cervical Neck Manipulation*.

Police vetting

As this is not the current standard required for registration with the Council, vetting is not required. Should the Council's standard in this regard change in the future, providers will be informed, and the Council's standards will be modified accordingly.

Entry requirements for the Graduate Certificate in Chinese Medicine (Tuina Massage)

Students who undertake the Graduate Certificate have already studied a bachelor programme in TCM or equivalent programme as a pre-requisite for enrolment.

Approval of online courses

It is open to any education provider to apply for accreditation of their course to become a prescribed qualification for one or more of the Council's scopes of practice. Information on the accreditation standards and process can be found on the 'Accreditation' page of the Council's website.

Now that the first round of accreditations have concluded, the Council will shortly be consulting on proposed revisions to the accreditation standards and associated guidance material. The Council welcomes feedback on this consultation to further streamline the process and ensure it remains fit for purpose.

Inclusion of ACC processes and privacy law, as well as broaden cultural competency to include Pacific and wider Asian health perspectives alongside Te Ao Māori

This is a helpful suggestion. This feedback will be considered during the upcoming review of accreditation standards and guidance.

Council decision

The Council considered consultation feedback at its meeting held on 4 September 2025 and decided on a way forward. The Council resolved to confirm and proceed with the proposals made in the consultation document.

The Council published its Scopes of Practice in the NZ Gazette dated 17 September 2025. A link to the Gazette notice and the Scopes of Practice and prescribed qualifications can be found on the 'Scopes of Practice' page of the Council's website. The Gazetted changes come into effect from **16 October 2025**.