

Position Statement:

The availability of practitioner-only supplementation, functional and DNA testing

Background

Practitioner-only supplements, functional and DNA testing, are integral tools used by qualified healthcare professionals including naturopaths and medical herbalists, to support evidence-informed, individualised care. These products and services are typically available exclusively to trained health professionals due to their complexity, potency and the need for professional oversight to ensure safe and effective use and outcomes.

Access to these tools allows practitioners to:

- Provide targeted, personalised treatment plans.
- Monitor patient progress with objective data.
- Identify contraindications.
- Reduce the risk of adverse interactions.
- Support optimal health outcomes through evidence-based interventions.

Education Standards for Naturopaths

NMHNZ members meet rigorous educational standards, including:

- A minimum of a level 7 bachelor's degree (or equivalent) in naturopathy and/or herbal medicine.
- Comprehensive training in anatomy, physiology, pathology, pharmacology, clinical nutrition, herbal medicine, and clinical practice.
- Ongoing professional development to enhance knowledge and skills.

These qualifications ensure that NMHNZ members are competent to prescribe practitioner-only products and interpret functional testing responsibly.

Definitions

- **Practitioner-only supplements:** Nutritional or herbal products formulated for use under the guidance of a qualified health professional. These may contain higher doses or specific combinations not available in retail products.
- **Functional & DNA testing:** Diagnostic tools used to assess physiological function, including but not limited to hormone panels, gastrointestinal testing, nutrient status, and toxicology screens.

Regulations

In New Zealand, practitioner-only products are regulated in the same way as products available for General Sale, as a Dietary Supplement. In New Zealand there are clear limits on amounts of nutrients allowed in supplements, and exclusions of ingredients that are listed in the First Schedule of the Medicines Regulations 1984 (Medsafe, 2024).

Responsibility for Functional Testing is covered by the Consumer Guarantees Act and the Health & Disability Commissioner Act. The Consumer Guarantees Act sets out that any service provided to a consumer must be performed with reasonable care and skill, therefore, if a practitioner supplies this service with a purpose in mind, they must be able to help the patient achieve that purpose (Consumer Guarantees Act, 1993).

The Health & Disability Commissioner Act governs all health and disability services in NZ, including functional testing. Consumers are entitled to the protections outlined in the Health & Disability Commission's Code of Rights, which include receiving services of an appropriate standard with reasonable care and skill, and having informed consent. Providers of functional tests must adhere to these rights when conducting, explaining, interpreting, and storing test results (Health and Disability Commissioner, n.d.).

NMHNZ Position

NMHNZ strongly advocates for practitioner-only supplements, DNA and functional testing remaining restricted to appropriately qualified health professionals. Allowing access to unsuitably qualified individuals or direct-to-consumer sales may pose significant risk.

NMHNZ strongly advocates for:

1. **Public Safety and Professional Competency**
Practitioner-only supplements, DNA and functional testing must remain restricted to appropriately qualified health professionals. Allowing access to unsuitably qualified individuals or direct-to-consumer sales poses significant public safety risks, including:
 - a. Misinterpretation of complex test results leading to inappropriate treatment decisions.
 - b. Potential for harm from high-potency supplements used without professional oversight.
 - c. Lack of understanding of contraindications, drug-nutrient interactions, and individual patient contexts.
 - d. Financial exploitation of consumers who may purchase unnecessary or inappropriate testing.
2. Continued access to practitioner-only supplements, DNA and functional testing for qualified naturopaths and medical herbalists.
3. **Ethical Obligations of Practitioners**
Practitioners have an ethical responsibility to:
 - a. Possess comprehensive knowledge and competency in interpreting functional and DNA testing results.
 - b. Provide evidence-informed recommendations based on test outcomes.
 - c. Obtain informed consent and ensure patients understand the purpose, limitations, and costs of testing.
 - d. Only recommend testing when clinically indicated and in the patient's best interest.
 - e. Maintain appropriate professional boundaries with testing companies and avoid conflicts of interest.
4. Recognition of NMHNZ members as competent health professionals with the training to use these tools safely and effectively.
5. Collaboration with regulatory bodies to ensure that any future legislation supports integrative healthcare and patient choice while maintaining public safety standards.
6. Public education on the importance of professional guidance when using high-potency supplements or interpreting complex test results.



References

Consumer Guarantees Act 1993, No. 91. *New Zealand Legislation*. Retrieved from <https://www.legislation.govt.nz/act/public/1993/0091/latest/whole.html> [[legislation.govt.nz](https://www.legislation.govt.nz/)]

Health and Disability Commissioner. (n.d.). *Code of Health and Disability Services Consumers' Rights*. Retrieved November 3, 2025, from <https://www.hdc.org.nz/your-rights/about-the-code/code-of-health-and-disability-services-consumers-rights/>

Medsafe. (2024, October 15). *Regulation of dietary supplements*. New Zealand Ministry of Health. <https://www.medsafe.govt.nz/regulatory/DietarySupplements/Regulation.asp>