

6 August 2025

Therapeutic Goods Administration  
Department of Health

Dear Sir/Madam,

The [Psychotherapy and Counselling Federation of Australia](#) (PACFA) is the leading national peak body for the tertiary-qualified counselling and psychotherapy profession. With more than 11,000 members, PACFA provides registration and quality assurance services for counsellors and psychotherapists nationally. PACFA members designated as Registered Clinical Counsellors, Certified Practising Counsellors and Registered Clinical Psychotherapists are fully qualified allied health practitioners as recognised by PACFA's full membership of [Allied Health Professionals Australia](#) (AHPA). PACFA is also a qualifying member of the [National Alliance of Self-Regulating Health Professions](#) (NASRHP) and a key advisor to the [National Standards for Counsellors and Psychotherapists](#) project funded by the Department of Health, Ageing and Disability and due for finalisation in late 2025.

Registered Clinical Counsellors and Registered Clinical Psychotherapists are highly trained experts in talk and creative therapies who work with people across the lifespan they provide evidence-based interventions to build self-awareness, enable psychological connection and reduce distress. Research consistently shows that counselling is highly effective in preventing, mitigating and resolving a wide range of presenting challenges across the lifespan.

Registered Clinical Psychotherapists are credentialled counsellors who have undertaken substantial additional advanced training in psychotherapy. Psychotherapy is a holistic, relational clinical approach that focuses on the whole. Psychotherapy encompasses the physical, emotional, mental, cultural, and spiritual aspects of health and well-being and addresses both everyday concerns and severe issues. Registered Clinical Psychotherapists utilise expertise from advanced training, clinical supervision, their own personal psychotherapy, as well as professional development to ensure safe, ethical practice which draws from a broad base of theory and evidence-based contemporary practice to work with significant complexity.



PACFA members are widely involved in the development of the framework proposed by the Australian Multidisciplinary Association for Psychedelic Practitioners (AMAPP) and is supportive of this emerging area of practice. Whilst psychotherapy provided in a setting with psychedelic prescribing is not included in PACFA's current Scope of Practice we recognise its potential relevance for our Advanced Scope of Practice (currently in development).

PACFA endorses the inclusion of both Registered Clinical Psychotherapists and Registered Clinical Counsellors with additional training (and associated credentialling) in psychedelic assisted psychotherapies to work in specific roles as outlined by AMAPP. As appropriate PACFA welcomes the opportunity to work with AMAPP on the development of essential resources such as Clinical Guidelines, and processes such as a partnership to support ethical advice and complaint remedy as required.

If you would like any further information about PACFA or any of the information provided in the submission regarding PACFA members please do not hesitate to contact myself on [jdeweever@pacfa.org.au](mailto:jdeweever@pacfa.org.au)

Yours sincerely,



Johanna de Wever  
**Chief Executive Officer**