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**An Open Letter to Naturopathy and Herbal Medicine Practitioners from the
ARONAH Steering Committee**

The Steering Committee is aware that the proposal to establish an Australian Register of Naturopaths and Herbalists is a major step and that some practitioners might have concerns. The purpose of this letter is to explain the reasons for this move and to clarify issues practitioners have raised. We appreciate feedback and wish to maintain a dialogue with you in the interests of clarity, keeping practitioners informed, and receiving feedback.

This is the first independent register of naturopaths and herbalists in Australia and is designed to ensure minimum education and practice standards for these professions. There will be implications for the professional associations and this will be discussed below, but firstly the Steering Committee acknowledges the very significant work that most professional associations do in supporting and advancing the professions, and has no interest in replacing them. The role of a register is different. Its aim is to protect the public by setting minimum standards for education and ethical practice. In order to achieve this aim the process needs to be independent, as it is for most other health professions in Australia.

The reasons for the register are many. Although most practitioners are competent and honourable there have been a number of instances of naturopaths and herbalists being found guilty of misconduct. The variability in complaints processes and arbitration between associations has meant that these individuals have not always been dealt with appropriately – in some cases being able to remain practising members even after grievous misconduct. Complaints processes amongst the various associations are not always transparent and in some cases it may not be possible to obtain fair investigation of an issue as people on the complaints panel may know the member under investigation. Even when professional association members are found guilty of misconduct and

expelled, they can simply join another association as many associations do not cross-report. Of course, even if practitioners are unable to join another professional association it is still possible to practice as a naturopath or herbalist, for example by prescribing diets and dried herbs.

An independent register makes it possible for the public to make an informed choice about their naturopath or herbal medicine practitioner. The purpose of ARONAH is merely to identify in an independent and transparent way those professionals who are appropriately qualified and agree to abide by minimum practice standards, and to alert the public to those found to practice in a dangerous, bogus or unethical manner. The vast majority of naturopaths and herbalists in practice are appropriately qualified and do act ethically, and therefore have nothing to fear from the register.

There are other important reasons for the register. The large number of associations has resulted in a wide variation in requirements for membership. For people outside the professions of naturopathy and herbal medicine the situation is very confusing regarding issues such as how to evaluate a practitioner's credentials, how and where to make a complaint, whether they can have confidence that the system is protecting the public, the difference between accreditation and registration, etc. Busy GPs don't have the time to work out whether an individual practitioner is suitable for referral, and government is losing confidence in self-regulation. For example, due to federal government requests health funds are no longer automatically accepting professional association membership as a guarantee for practitioners to be eligible for rebates and will begin to assess practitioners independently after July 1 2009. Government bodies have consistently said that they cannot deal with a disunited profession.

There is a growing consensus that regulation needs to be independent. A national registration body will provide a 'one stop shop' where the public, other health professionals and government can have confidence that minimum standards of education and practice apply, and processes are independent, accountable and transparent. National registration will provide parity with other health professions in these important areas.

Relieving professional associations from the burden of accreditation will actually have a substantial benefit for the associations. Associations will be able to direct more resources to advancing the professions, promoting their members, and offering new services if they are no longer required to accredit members.

We appreciate your concern that naturopathy and herbal medicine pose little risk. When administered appropriately by suitably trained professionals these modalities do pose little risk to

the public, but when practised by untrained or unethical individuals the risk can be substantial. Risk is not just about treatment but includes professional conduct. The real incidence of harm is hard for practitioners to assess due to lack of transparency in reporting processes by associations, and likely under-reporting by the public because of various difficulties around making complaints. The register is aimed at protecting the public from risk, providing a robust and centralised complaints process, and directing the public to those practitioners who are well qualified. We invite you to further explore our website (www.aronah.org) which answers many queries in more detail, and to investigate the links provided for additional information on the important issue of regulation.

Yours sincerely

Spero Tsindos, Chair of the ARONAH Steering Committee

Paul Orrock, Spokesperson, ARONAH Steering Committee

On behalf of the ARONAH Steering Committee