

School of Health and Human Sciences

Ph: (02) 6620 3854

Fax: (02) 6620 3022

sue.evans@scu.edu.au

The Australian Register of Naturopaths and Herbalists

PO Box 157

Lismore NSW

To whom it may concern

Thank you for the opportunity to contribute to discussion on the establishment of an Australian Register of Naturopaths and Herbalists.

Please find attached some reflections on the project.



Dr Sue Evans

Course Coordinator, Bachelor of Naturopathy.

Submission to the Australian Register of Naturopaths and Herbalists

As the provider of the first (and only continuing) university degree in naturopathy, the staff of the Naturopathy program at Southern Cross University is largely (but not unanimously) in support of moves to register herbalists and naturopaths.

For the most part, this submission will address stakeholder concerns rather than make recommendations for the constitution of the Board or for specific educational standards to apply to practitioners. However three preliminary points are in order, before addressing the major issues of public safety, and the relationship between practitioners (naturopaths and Western herbalists) and mainstream healthcare.

Firstly the registering Board must not only be impartial but it must be seen to be impartial. Impartiality may be achieved by either the appointment of impartial members, or ensuring that a clear balance of views and interests is represented on the Board.

Secondly there is currently a wide range of courses which undertake practitioner training in naturopathy and Western herbal medicine. These range from Diploma to Masters; from two year to four year awards and include (varying amounts of) both face-to-face and distance education. Some courses are stringently rigorous in their requirements, and others appear to be much less demanding. In the current circumstances it is difficult for the public, the government and other health professionals to differentiate between practitioners. Increased clarity regarding educational standards would be useful.

Thirdly, and most importantly, it will be an enormous challenge to retain the distinctive philosophy and approach to practice which characterises naturopathy and Western herbal medicine as practitioners become part of mainstream healthcare. Our philosophy ensures that individuals are understood as unique, and within a holistic framework. Our treatments are individualised and multi-faceted. Our patients are encouraged to be responsible for their own health, and sensitive to their own wellbeing. Our approach has implications for lifestyle choices, food choices and farming practices. It can potentially save the health system untold dollars as well as having positive environmental consequences. Today, this approach is needed more than ever before.

It is not in anyone's interest that this economically and ecologically sustainable approach to healthcare is subsumed by the concerns of the larger system. Should the establishing of a registration board, or statutory regulation, require this philosophy to be abandoned, or significantly compromised, that price would be too great.

Public Safety

The Australian Health Ministers Advisory Council has advised that statutory registration of currently unregulated health professions will occur only where there is a significant risk to public health and safety (Lin, Bensoussan et al. 2005).

Some authors contend that the current lack of registration of naturopaths and herbalists is a public health issue (Lin, Bensoussan et al. 2005), and the safety issues which have been described are associated with practitioner risks of omission (failure to act) and commission (inappropriate action

(Bensoussan and Myers 1995; Lin, Bensoussan et al. 2005). Other practitioners are of the strong view that there is no evidence to support claims of actual harm occurring to patients through the practices of bona fide naturopaths and Western herbalists. Some argue that voluntary professional standards and complaint handling processes provide sufficient public protection.

However, while very little evidence of harm has been documented, the potential for harm is likely to increase when naturopaths and herbalists work in environments of high intervention, including situations where patients are using polypharmacy and/or are being treated for multiple, often chronic problems. This becomes even more likely where high dose concentrated herbal and nutritional products are dispensed.

In such circumstances, it may be appropriate to ensure that these practitioners have demonstrated a minimum standard of diagnosis, and are able to address safety concerns regarding medical conditions, modalities and interactions between pharmaceuticals and certain types of herbs and nutrients. This would apply particularly to practitioners prescribing products in healthcare facilities, integrated clinics and hospitals.

Practitioners (naturopaths and herbalists) and mainstream healthcare.

The absence of formal pathways which would allow well-qualified practitioners to be differentiated from poorly-qualified ones (see above) has broad consequences. It impacts not only on patient choice but also on the ability of naturopaths and Western herbalists to practically engage with the broader healthcare system, and as a consequence they are rarely employed in the healthcare system.

Naturopathy and Western herbal medicine are practised almost exclusively as private medicine in Australia, and therefore their clinical interventions are available only to patients with relatively high disposable incomes, and its potential for cost-effective health benefits remains unrealised.

Almost all naturopathic courses are aimed at practitionership, yet evidence suggests that most practitioners are part time workers in clinical practice and it does not provide their major source of income (Bensoussan, Myers et al. 2003). The potential for naturopaths to work in a range of health related areas in addition to private practice is not yet fully realised.

Registration – possibly not for all

It may be that a differentiation between practitioners is appropriate for naturopathy and Western herbal medicine. Should statutory regulation be introduced, not all naturopaths and herbalists are going to be in registered clinical practice for all of their working lives. It will be important that ways are found to retain professional engagement with those who are trained as naturopaths and Western herbalists, who identify with the profession of naturopathy and Western herbal medicine, but are not currently registered.

As the terms of reference for the Board are developed, it is therefore important that practitioners who decide against registration are not excluded from the profession. It is likely that were statutory regulation introduced, practitioners would move in and out of status as a registered practitioner as their jobs and life situation require it. Registration may be more appropriate for some types of clinical work than for a naturopath or herbalist working in education, manufacturing, retail or

regulation, or for people using naturopathy and herbal medicine informally with their family and friends. Given this, it is important that ways be found to include non-registered practitioners and non-clinical naturopaths and herbalists within the profession. At a minimum, this means that the range of 'proscribed' occupational titles, as suggested in the Lin report (2005 p306) will need to be reduced.

Bensoussan, A. and S. Myers (1995). Towards a Safer Choice: the practice of Traditional Chinese Medicine in Australia. Sydney, University of Western Sydney Macarthur.

Bensoussan, A., S. Myers, et al. (2003). A Profile of Naturopathic and Western Herbal Medicine Practitioners in Australia. Sydney, University of Western Sydney.

Lin, V., A. Bensoussan, et al. (2005). The Practice and Regulatory Requirements of Naturopathy and Western Herbal Medicine. Melbourne, La Trobe University.