



Australian Register of Naturopaths and Herbalists

7th August 2019

RE: Natural Therapies Review 2019-20, Terms of Reference

To whom it may concern.

We were pleased to hear of the Australian Government's decision to commission an updated review of certain natural therapies to determine whether these therapies should be eligible for subsidy through the private health insurance rebate. We are also thankful for the opportunity to comment on the Terms of Reference for the Natural Therapies Review Expert Advisory Panel that will support the 2019-20 Natural Therapies Review. Our comments on the Terms of Reference are presented on behalf of the Australian Register of Naturopaths and Herbalists (ARONAH) board and membership.

ARONAH was established in July 2013 as an independent register for naturopathy and Western Herbal Medicine (WHM). The register mirrors the statutorily regulated boards administered by the Australian Health Practitioner Regulation Authority of the National Registration and Accreditation Scheme. Not dissimilar to these statutorily regulated Boards, ARONAH serves to provide minimum standards of education and practice for naturopathy and WHM in order to safeguard the public. Importantly, ARONAH is recognised by the World Naturopathic Federation as an ideal model in the absence of statutory registration. With this in mind, our comments on the Terms of Reference relate specifically to the discipline of Naturopathy (though are likely to have implications for other disciplines included in the review).

Our main concern relates to the scope of the review, which appears to be a legacy of the previous review. To elaborate, the 2014–15 review of natural therapies explicitly dismissed pertinent naturopathic research because it was conducted in other countries where naturopathy was a registered or licensed profession (unlike in Australia). This position runs counter to the intended purpose of registration and contravenes the explicit framework for registration in our country, which states that a profession should not be unduly disadvantaged based on its regulatory status. We argue that the practice of naturopathy in Australia is in fact comparable to other international jurisdictions; for instance, (a) ARONAH has developed education standards that have been benchmarked against the North American naturopathic education standards (http://www.aronah.org/wp-content/uploads/Naturopathic-Education-Accreditation-Standards_2019.pdf) (b) Australian naturopathic education is classified in the top tier of naturopathic education globally, along with Canada, India, South Africa and the United States (http://worldnaturopathicfederation.org/wp-content/uploads/2018/11/WNF-Education_and_Credentials_1.2.pdf), and (c) a comparison of a leading Australian four-year program and the leading accredited Canadian four-year program shows the Australian and Canadian courses to be comparable (https://www.researchgate.net/publication/331789476_An_evidence_based_overview_of_naturopathic_practice_in_Australia). Taking this information into account, ***we recommend that the Terms of Reference explicitly state that evidence will not be disregarded based on country of origin, or regulatory status of the profession.***

Another legacy of the previous review that is at risk of being introduced in the 2019-20 review relates to scope of practice. The 2014–15 review of natural therapies excluded interventions not defined as 'naturopathy', or WHM thus dismissing an entire body of evidence pertinent to both professions, that



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is, the 'tools of the trade' (e.g. nutritional supplementation, herbal medicine). Most health disciplines lack a solid body of evidence to support their discipline; instead, these disciplines rely on evidence to support their tools of the trade (e.g. pharmaceutical agents prescribed by general practitioners, behavioural therapies prescribed by psychologists). Accordingly, it would be unjust to review Naturopathy and WHM without the same level of consideration afforded to these other health disciplines. With this in mind, ***we recommend that the Terms of Reference incorporate pertinent 'tools of the trade' within the scope of evidence related to naturopathic and WHM practice.***

We thank you again for the opportunity to comment on the Terms of Reference. We welcome the prospect of discussing any of these points further, should there be such an opportunity.

Sincerely,

Jackie Arbuckle
Chair of ARONAH
On behalf of the board and members