



ARONAH Steering Committee  
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Dear Committee Members

**Re: Call for submissions – Practice and Standards for naturopaths and Western herbalists**

Thank you for providing an opportunity for the complementary healthcare industry to comment on a letter calling for comment on practice and registration standards for naturopaths and herbalists, dated 11 November 2010.

The Complementary Healthcare Council of Australia (CHC) is the peak expert association exclusively committed to a vital and sustainable complementary healthcare products industry. The CHC is unique in representing all stakeholder groups in industry including exporters/importers, manufacturers, raw material suppliers, wholesalers, distributors, direct marketers, retailers, practitioners, consultants and consumers.

The CHC notes the newly established Board for ARONAH and its request to seek input from various industry stakeholders on the practice, registration, training and education standards for naturopaths and Western herbal medicine practitioners and courses.

The following comments have been provided for the Board's consideration:

- The CHC, in general, recognises the advantages in establishing a registration process for naturopaths and Western herbalist practitioners in Australia to ensure a credible industry and accountability. However, it is important that the registration process is implemented appropriately to ensure ongoing accessibility of much needed practitioner only complementary healthcare products and advice to consumers.
- The CHC acknowledges there are similar registration frameworks in place (e.g. Chinese Medicine Registration Board (CMRB)) and suggests that ARONAH liaise with these groups to discuss appropriate pathways and the difficulties experienced with implementing such a process.
- Any registration process that is implemented must recognise current 'qualified' naturopaths and herbalists, as well as those currently completing training to become such a practitioner, as part of the introduction to the registration process; this means establishing a 'grandfathering' clause.
- It is noted that ARONAH will only capture naturopaths and Western herbalists (given the name of the Board), which raises questions around the recognised registration given to practitioners. For example, if practice is registered, a naturopath would be registered as such and not a Western herbalist, will they be able to practice western herbal medicine? The CMRB currently regulates the 'title' only and requires practitioners to register for both acupuncture **and** Chinese herbal medicine.

This issue will be very complex noting the profession of naturopathy potentially covers a broad range of therapies such as Western herbal medicine, homoeopathy, clinical nutrition, remedial massage, kinesiology, bioenergetics medicine, myotherapy etc, depending on the definition applied. The CHC questions how this will be addressed by the Board and requests that any proposed definition of the practice of naturopathy be heavily consulted with practitioners and institutions/universities.

- Noting that ARONAH is not a statutory body, it will be required to operate as other professional bodies, the CHC questions how registration will be mandated and how action could be taken against those considered to be in breach of ARONAH's standards? For example, if a practitioner is not registered with ARONAH, and is practicing naturopathy, will they be found to be in breach? If they were found in breach, how would this be enforced?

Furthermore, given that the mandate for Registration of the professions is for consumer protection, how will ARONAH achieve this outcome without legislative underpinning?

- The CHC suggests ARONAH collaborate with the relevant institutions and universities to determine minimum education and qualification standards. In addition, discussing this with already established registration Boards may also be of assistance.
- Finally, the CHC questions why only naturopaths and Western herbalists have been captured by this initiative and questions whether additional professions will be considered in the future?

Please do not hesitate in contacting me about any comments within this submission to discuss further.

Yours sincerely



Kristy Tomas  
Scientific & Regulatory Affairs Manager

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