

19<sup>th</sup> December, 2013

Dear Practitioner,

There has recently been correspondence between a number of organisations and the practitioner community regarding the Australian Register of Naturopaths and Herbalists (ARONAH). This correspondence has primarily centred on a potential solution to the issues associated with the Therapeutic Goods Administration (TGA) review of their criteria for Therapeutic Goods Advertising Exemption.

Unfortunately some of these communications have caused concern among practitioners and the ARONAH Board is therefore providing the following information to clarify the issue.

In the Board's submission to the TGA we proposed the ideal outcome was to maintain the status quo until statutory registration of naturopaths and herbalists has been supported by the Federal Government. However, ARONAH – along with all other stakeholders - were advised that this option is unlikely to be supported by the TGA.

After discussion with a number of stakeholders the Board gave an in-principle agreement to the Complementary Healthcare Council and the Australian Self Medication Industry to provide an interim solution for both the industry and the profession until such a time as statutory registration is put in place. The details of this arrangement have not been finalised, however, they are expected to include ARONAH providing some assessment of naturopath and herbalist practitioners who wish to retain eligibility for Advertising Exemption. It should be noted that this assessment would be solely for the purpose of identifying practitioners who may receive restricted advertising material and access to practitioner only products under TGA legislation, and those who choose not to be part of such a scheme would not in any way be restricted from practising naturopathy or Western herbal medicine.

There is also some potential for ARONAH to offer temporary assessment of nutritionists whilst providing consultative guidance and advice in the establishment of a similar register for nutritionists. Once established the responsibility for assessing the eligibility for nutritionists would shift to this new body. It is important to note that all elements of this agreement are 'in-principle' only and the details will only be finalised pending the support of the TGA.

A number of concerns have been raised by representatives of the practitioner community in response to this potential solution, many of which are already answered on our website ([www.aronah.org](http://www.aronah.org)). Clarification of some of the more pressing concerns for practitioners are included below.

Any practitioner who would like to discuss this issue or requires further clarification is welcome to contact the ARONAH Board.



**Amie Steel ND PhD MPH**  
Chairperson, Director



***I am a naturopath/herbalist and don't have a Bachelor degree. Can I still join the register?***

Degree level education in naturopathy and Western herbal medicine is still quite a recent development in Australia and currently only 43% of Australian naturopaths have this level of qualification. A set of grand-parenting standards have been established by ARONAH – based on processes used by the Australian Health Practitioner Regulation Agency (AHPRA) - which recognises pre-degree qualifications and longstanding experience within naturopathic and Western herbalist professional groups. These standards allow registration for practitioners with: a degree qualification in naturopathy or Western herbal medicine; a vocational qualification in naturopathy or Western herbal medicine (with some specific clinical course requirements); or another qualification in naturopathy or Western herbal medicine providing they can show evidence that they have been in regular practice in the last ten years. The requirements for joining the register through any of these three pathways is clearly explained in the Grand-parenting and General Registration Eligibility Registration Standard Requirements.

These grand-parenting standards will be in place until June 30 2016 after which only degree qualified naturopath or Western herbal medicine practitioners will be eligible to join the register.

***Is this the same as statutory regulation?***

No, this is not the same as statutory regulation. As the register is independent and is not underpinned by government legislation it cannot enforce requirements such as protection of title or barring people who have committed serious breaches from practice. However, practitioners who act unethically can be removed from the register, and several third parties have expressed interest in having an independent register through which they can identify qualified and accountable practitioners. The Steering Committee and the Board of the register will be advocating for statutory registration and the register is intended to be subsumed by the government's national registration process for health practitioners. The development of the register is designed to mirror statutory regulation processes, an approach for which we have received support from AHPRA.

***How is ARONAH different to my association?***

The defining difference between ARONAH and a professional association is that ARONAH represents the public interests whilst a professional association is primarily established to advocate for the profession. In naturopathy and Western herbal medicine in Australia, the professional associations have attempted to fulfil both of these functions in the absence of a national register. With ARONAH focusing on the public safety and protection components that are the role of independent registers in other professions, professional associations will be more able to dedicate their resources to supporting, promoting and advocating for the professions and their membership.

In addition, whilst professional associations do define minimum standards, the large number of associations has resulted in an inconsistency in standards required of practitioners. ARONAH will – for the first time - provide a nationally-consistent standard for all naturopathic and Western herbal medicine practitioners irrelevant of the professional association they choose to affiliate with. These differences have been explained in detail in a recently published journal article which is available on the ARONAH website.



***Who determines ARONAH's standards and guidelines?***

It is embedded within the corporate constitution for ARONAH that we comply with the same legislation which directs the activities of AHPRA. This requires that all standards and guidelines are reflective of those expected of registered health professionals such as acupuncturists, chiropractors, and osteopaths. The current standards and guidelines were developed through two subcommittees consisting of leading practitioners in both the naturopath and herbal medicine community, a list of which is available on the ARONAH website. The draft guidelines and standards were then released for extensive consultation with the broader community, at which time all practitioner associations were contacted directly to invite their feedback and national feedback sessions open to the public and practitioners were held in every state and territory. The input of those associations, organisations and individuals that chose to respond were then integrated into the guidelines and standards as appropriate. ARONAH also has an ongoing consultation process whereby all professional associations and stakeholders are invited to submit their feedback on all ARONAH standards.

Further details on these or any other issues associated with ARONAH's activities all submissions, guidelines, forms and other documents are available on our website, [www.aronah.org](http://www.aronah.org).

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