

Mr Kevin Montgomery
Principal
New South Wales School of Natural Medicine
202 North Boambee Rd
Coffs Harbour NSW 2450

December 2 2010

Dear Mr Montgomery

Thank you for your interest in the *Australian Register of Naturopaths and Herbalists* (ARONAH). Please find responses to your individual queries below. Specific references to statements made in this letter can be found on the ARONAH website (www.aronah.org).

Why is ARONAH representing only naturopaths and herbalists and not all complementary medicine modalities?

ARONAH would prefer the term 'disciplines' when discussing different systems of complementary medicine, as 'modality' indicates a singular form of treatment, rather than the complex and interrelated combination of therapeutic approaches offered by complementary medicine disciplines. Although there are often attempts to combine many disparate complementary medicine disciplines under the single moniker of 'natural medicines', in reality each of these disciplines exhibit very different requirements in terms of practice and education standards and therefore requires very different regulatory arrangements. To attempt an inflexible 'one-size fits all' approach would not be respectful or beneficial to any discipline.

Therefore ARONAH has chosen to deal with naturopathy and Western herbal medicine only. This is similar, for example, to the fact that the *Australian Register of Homoeopaths* (AROH) have chosen to deal with homoeopathy only. Although ARONAH will not be covering other disciplines, it would welcome moves by these disciplines to develop further, preferably independent, regulation and would offer any support to these endeavours when appropriate.

ARONAH understands that there are moves to create an *Inter-Association Regulatory Forum* for other complementary medicine disciplines and offers in-principle support for this move. However, ARONAH also believes that issues specific to the practice of naturopathy and Western herbal medicine make self-regulation or co-regulation inappropriate for these professions. These issues include the inherent risks associated with the provision of ingestible medicines and the increasing size and scope of the profession in Australia. This is a stance supported by the report on the regulatory requirements for naturopathy and Western herbal medicine conducted by the Victorian government as well as every state and federal report on this issue since 2000.

ARONAH has made it very clear from the outset that it is only dealing with naturopaths and herbalists and will not cover other disciplines.

Although ARONAH is aware of the benefits of various complementary medicine disciplines it should be pointed out that being registered with ARONAH, or any regulatory body, is not an automatic 'entitlement' for practitioners. ARONAH is established for the public – as is the case for all independent regulatory bodies – and is open to professionals who can demonstrate appropriate levels of training and agree to abide by minimum practice standards. ARONAH is currently consulting all stakeholders on what these should be and would welcome a further submission from you on these issues.

Limiting ARONAH to naturopaths and Western herbalists only does little to protect the public

Naturopathy and Western herbal medicine have already been identified as professions requiring specific regulation by a number of government reports. Additionally, naturopathy and western herbal medicine have become a recognised 'brand' in Australia and one which the public assumes have met certain minimum standards of training. For these reasons, independent regulation of these professions specifically has been supported by various government reports.

By having an independent register ensuring minimum standards of accountability and training within these professions, public safety can be enhanced when patients choose to utilise the services of these professions.

ARONAH understands that there are many risks to the public, but it or any other organisation cannot be expected to protect the public against them all. ARONAH has therefore chosen to focus on naturopathy and herbal medicine only.

The Health Training Package already sets minimum standards

There are currently several standards for naturopathic and herbal medicine training in Australia, of which the health training packages are only one. These differences extend far beyond the current tensions between the two 'models' (vocational and higher education) of accreditation.

Definitions and minimum training standards for naturopathy and Western herbal medicine used for various government departments and various pieces of legislation also have marked differences. For example, the *Australian and New Zealand Standard Code for Occupations* used by many of these bodies not only indicates that these professions 'Skill Level One' requiring degree or higher level training but also indicates that registration should be required. ARONAH aims to simplify this process by implementing a standardised approach, which will be based on existing systems. If it is deemed that standards do not to increase beyond what they are now, there will be appropriate transitional arrangements to allow practitioners, education providers and other stakeholders to make any required changes.

ARONAH is glad that you have raised the short-comings and the current decline in graduate standards. These issues have been one of the drivers for recent increase in attention on issues of naturopathic and Western herbal medicine regulation. Many of Australia's courses do not meet *World Health Organization* recommendations for clinical training complementary medicine

training due in part to these short-comings. It needs to be remembered that Australia has international as well as domestic obligations in this area. ARONAH will be working with the industry to improve existing systems over time to ensure graduates are suitably trained. ARONAH will not aim to be arbitrarily imposing standards that are impractical.

The Board is overly weighted with academics and therefore not suitable to represent professional practitioners

ARONAH is based on the legislation of the *National Registration and Accreditation Scheme*. Due to this, ARONAH has never stated to represent the profession. This is the role of professional associations, and ARONAH will complement the good work of these associations by representing the interests of the public. However, as in all National Boards under the *NRAS*, the ARONAH Board does have a majority of practitioner members to ensure that regulation is fair and not overly burdensome on the professions of naturopathy and Western herbal medicine, whilst still representing the interests of the public.

The ARONAH Board is made up in accordance with *NRAS* guidelines, which for a Board of its size (9 members) requires it be made up of 3 community members from across Australia and 6 practitioner members representing various jurisdictions. ARONAH rejects outright the notion that the ARONAH Board is very heavy with members working in academia and is therefore not representative of professional practitioners.

The only eligibility criteria for community members are that they have not practised in the fields of naturopathy or herbal medicine. Two of these non-practitioner members are academics.

As it stands all practitioner members are in current practice and only one-third (2 out of 6) are employed in an academic capacity. Contrary to your suggestion, these practitioners have been able to maintain successful practice careers in addition to their academic roles.

As per *NRAS* guidelines one practitioner member has to be selected from each of the larger states (New South Wales, Queensland, South Australia, Victoria and Western Australia) and one practitioner member from the 'smaller jurisdictions' (Australian Capital Territory, Northern Territory and Tasmania). It should be pointed out that under your suggestion you yourself would not be eligible for a position on the Board due to your role as an 'academic', being principal of the *New South Wales School of Natural Medicine*. As it stands you are in fact eligible, and the Board would welcome an application from you for a role in ARONAH. Positions will be continually posted on the 'Consultations' section of the ARONAH website.

ARONAH is interested to hear of your claim of the poor success rate of university-trained practitioners, as ARONAH is unaware of any data suggesting university training disadvantages practitioners. ARONAH would welcome a further submission from you highlighting this issue. ARONAH understands that poor success rates in private practice are in fact an issue faced by naturopathic and Western herbal medicine graduates from all institutions. ARONAH would suggest that this is an issue you should raise with the various professional associations, who should be representing their practitioner members and seeking solutions to this long-standing issue.

Additionally Board vacancies were advertised in a national newspaper and all stakeholders were notified of the application process and invited to submit an application. In fact, this invitation was sent to the same address as the last correspondence you received from ARONAH. Applications were in fact open to everyone and Board members could only be selected from applications received. The due date for applications was extended twice due to popular demand, to ensure practitioner and community member applicants had ample opportunity to submit their application. The final selection was made by a panel independent of the professions of naturopathy and western herbal medicine.

ARONAH is opposed to setting quotas (beyond state representation as mandated by the *NRAS*) of any kind for Board positions and all applicants were selected on the basis of independent merit and their ability to represent the public (community members) or the profession (practitioner members). This opposition extends to the introduction of any criteria on the institution of graduation for applicants.

ARONAH hopes that this has satisfactorily answered your questions.

Thank you again for your interest in and submission to ARONAH. If you have any further questions please do not hesitate to contact us.

Yours sincerely



Jon Wardle

Administrator – Australian Register of Naturopaths and Herbalists