



**Complementary Medicines Australia Submission to
Mr Kim Snowball Independent Reviewer to the National Registration
and Accreditation Scheme for Health Professionals**

Submission to:

Mr Kim Snowball

Independent Reviewer

Appointed by Australian Health Ministers' Advisory Council

Review of the National Registration and Accreditation Scheme for Health Professionals

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From:

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Complementary Medicines Australia (CMA) welcomes the Australian Health Ministers' Advisory Council (AHMAC) commissioning of an independent review into the National Registration and Accreditation Scheme for Health Professionals.

About Complementary Medicines Australia

CMA, formally the Complementary Healthcare Council of Australia, is the leading expert association exclusively committed to a vital and sustainable complementary healthcare products industry. We are unique in representing all stakeholder groups in the complementary healthcare industry; our members include importers, exporters, raw material suppliers, manufacturers, wholesalers, distributors, retailers, practitioners, consultants, direct marketers, multi-level marketers and consumers. CMA is the principal reference point for members, the government, media, and consumers to communicate about issues relating to the complementary healthcare industry.

Consultation on reform proposals

CMA has actively been involved in previous national consultations on options for the regulation of unregistered health practitioners in which we supported the development of a national statutory Code of Conduct. The development of a Code of Conduct however, should not in any way impede individual professions, particularly those that could pose a significant risk to consumers such as ingestive modalities,¹ from making an application for statutory registration.

In addition, CMA recently provided a submission to the Therapeutic Goods Administration (TGA) in response to an extensive consultation on options for advertising reform. Of the options proposed was consideration to update the exemption for health professionals in section 42AA of the *Therapeutic Goods Act 1989* to only recognise health practitioners regulated under the Health Practitioner Regulation National Law. Currently, health professional noted in this section of the Act include orthodox practitioners, complementary practitioners such as herbalists, homoeopaths, chiropractors, naturopaths etc., and persons who are members of an Australian branch of one of those bodies listed in [Schedule 1](#) of the Regulations. CMA supported, as an interim option, for a registration and accreditation system that mirrors the national process and that could co-exist in with the current established practitioner associations (see list of related documents). To date no response has been provided by the government on these options for reform.

Should such an interim position not be desirable, there is a concern that these professionals will no longer be able to access the technical and scientific information, including contraindications, around the medicines for which they prescribe. CMA strongly believes that if health professionals are not able to access this information, as would be the case under option 2 proposed by TGA, this would increase the potential for harm to consumers. Further, this would encourage a greater use of the Internet for product knowledge, which would likely increase the illegal purchase of non-TGA registered products to be used for patient care, thus placing the population at an even higher risk. If such an interim position can not be reached, the complementary healthcare professions of naturopaths, nutritionists and Western herbal medicine practitioners should be considered a priority case for inclusion into the NRAS.

¹ Ingestive Modalities - using herbs, minerals and other natural substances as therapeutics.

In response to the consultation review of the NRAS

CMA supports an independent review into the NRAS and believes it is timely the scheme be reviewed to ensure it operates to protect the public safety in a manner that is transparent, accountable, fair and effective.

The national scheme was established to achieve six key objectives. In addition to protecting public health and safety are objectives to develop a responsive, flexible, and sustainable workforce and the promotion of access to health services. CMA considers an important and appropriate cornerstone to meeting these objectives is the consideration of the inclusion of other health disciplines into the NRAS.

The review consultation paper comments briefly on the desire for other health practitioners to join the scheme and is quick to point out that the national scheme was not established for the purpose to provide status and credibility to other health practitioner groups. Indeed, there is a history where registration may have once been viewed as a tool to legitimise a health profession, and for this reason, naturopathy and Western herbal medicine have been repeatedly denied registration based solely on these ideological grounds.^{2,3} Numerous government reports however have recommended independent statutory regulation yet naturopaths and Western herbalists are yet to be included in the National Registration and Accreditation Scheme⁴.

Complementary medicines and natural therapies are widely embraced by the Australian community. Two out of every three Australians regularly use a natural health care product making this an significant and important sector of healthcare.

Other complementary healthcare professions including chiropractors, acupuncturists, and traditional Chinese medicine practitioners have now been registered with the National Registration and Accreditation Scheme. Yet concerningly there is evidence emerging that the profession of herbalists and naturopaths is in decline while other CM professions are on the increase⁵. Among the possible factors for the emergence of this trend could be related to the influence of general practitioners on their patients and the lack of referrals to herbal medicine/naturopathic practitioners. For the complementary healthcare professions to be sustainable, it needs to gain the confidence of other health care professionals. In this regard, research in the field of complementary medicines continues to expand and will go some way to assist in improving the knowledge gap that exists and to highlight the specifics of practice of complementary healthcare professions.

The lack of referrals from GPs to complementary healthcare professionals, albeit based on lack of knowledge of the specifics of the profession or lack of recognition as a health care professional, opens consumers up to a greater risk as to the potential safety issues of particular herbal medicines and supplements.

² Guthrie H. 1961. Report of the Honorary Royal Commission appointed to inquire into the provisions of the Natural Therapists Bill: Western Australia Perth, Alex B Davies, Government Printer.

³ Webb E. 1977. Report of the Committee of Inquiry into Chiropractic, Osteopathy, Homoeopathy and Naturopathy. Canberra, Australian Government Publishing Service.

⁴ Wardle J, Steel A, McIntyre E. 2013. Independent registration for naturopaths and herbalists in Australia: the coming of age of an ancient profession in contemporary healthcare. *Australian Journal of Herbal Medicine* 25(3).

⁵ Sibbritt D, 2014. The decline of herbal medicine/naturopathy consultations: how research can help further the profession. *Australian Journal of Herbal Medicine* 26(1); 8-9.

Given the objectives of the scheme to promote access to health services, and drive a sustainable workforce, it is vital that consideration of the inclusion of the professions of Naturopaths, Western herbal medicine and nutritional medicine practitioners, be included into the national scheme.

Summarily, CMA supports the inclusion of naturopaths, nutritionist and Western herbal medicine practitioners into the National Registration and Accreditation Scheme. The entry of these natural healthcare professions into the NRAS will provide for increased capacity for consumers to access these healthcare services in a safe manner and for these professions to continue to play a key role in the Australian healthcare system.

Related documents:

- CHC submission: [Options for the regulation of unregistered health practitioners](#) (2011)
- CHC Registration of Naturopaths and Western Herbal Medicine Practitioners [White Paper](#) (2013)
- Submission on the Regulation Impact Statement: [Regulating the advertising of therapeutic goods to the general public](#) (2013)
- Consultation paper: [Review of the National Registration and Accreditation Scheme for Health Professionals](#) , August 2014.

ENDS