INTRODUCTION

This submission is made by the Complementary Medicine Association, the “CMA”. We are an association of qualified, professional Naturopathic practitioners. The CMA is registered with the ATO as an Association of Health Care Professionals, thus granting CMA practitioners GST exemption on all consultations. This is based solely on their Full Membership of the CMA and the strict criteria which the CMA demands in the granting of Full Membership. The TGA, Work Cover and most major Health Insurance funds accept CMA members on exactly the same basis.

In this submission, we present impelling arguments in favour of the maintenance of the Australian Government Rebate on Private Health Insurance for Naturopathic Consultations, in the interests of public health and to allow the science of Naturopathy to continue to contribute to the relief of the illness crisis in our country.
THE SCIENCE AND PHILOSOPHY OF NATUROPATHY

The practice of Naturopathy in Australia today is science and evidence based and highly professional in its delivery. The true strength of Naturopathy lies in its underlying philosophy, which sees the client as a complete being and the body as a complete system. Naturopathy sets out to restore health by addressing the underlying cause or causes of ill-health.

The science of Naturopathy has for centuries been dedicated to the establishment and maintenance of human health, using naturally occurring supplements, diet, tactile therapies and lifestyle, to co-operate with the body’s natural processes. Naturopathy regards the individual as a complete being and therefore integrates both emotional and physical indicators to assess and address health issues. Naturopathic treatments complement the body, are non-invasive and inherently safe when administered by qualified, professional Naturopaths.

COST EFFECTIVENESS OF NATUROPATHY IN AUSTRALIAN HEALTH CARE

The profession of Naturopathy and the services offered by qualified Naturopaths are highly valued by many people in Australia, who seek to actively maintain their optimum level of health and wellbeing. Naturopathy is a primarily self-funded modality which places no load at all on the Medicare system. Add to this the fact that most people do not include ancillary benefits in their health insurance policies and it is clear that Naturopathy actually places only a minimal demand on the private health sector.

As a highly effective, safe and viable modality, Naturopathy can be readily utilised to complement the existing health system, thereby reducing the load in many areas. It is especially worth noting that the science of Naturopathy is particularly effective in the treatment and relief of many chronic conditions and is a highly cost effective way of reducing the substantial load which these conditions place upon the nation.

There is a large and growing number of Australian Allopathic Medical Practitioners who, having recognised the benefits and efficacy of Complementary Medicine, are studying and integrating Complementary Medicine procedures into their general practices. These doctors are calling themselves Integrative Medical Practitioners.

When Allopathic Medicine and Naturopathy work together to complement one another to the benefit of the patient, the resulting integrated approach produces a very potent outcome indeed.
WHAT NATUROPATHY OFFERS PUBLIC HEALTH CARE

The essential differences between Naturopathy and Allopathy (the science practiced by Medical Practitioners), are quite significant and relate back to the philosophical differences between the two sciences. These very differences place Naturopathy in a unique position to offer aspects of health care that are extremely worthwhile and otherwise unavailable. Some of the unique benefits of Naturopathy include:

- Specialises in preventative, complementary health care management, utilising a wide variety of natural modalities and utilises only naturally occurring substances or their derivatives.
- Focuses on the underlying cause of illness
- Seeks to address the cause of illness and to restore health.
- Seeks to maintain good health and thus to prevent illness.
- Co-operates with the body’s natural processes.
- Does not involve surgery.
- Does not involve life-threatening procedures.
- Uses natural and safe supplementation with few contra-indications.
- Is very cost-effective in that it maintains health and therefore reduces need for hospitalisation, reduces illness related loss of productivity.

SIMILARITIES BETWEEN NATUROPATHY AND ALLOPATHIC MEDICINE

Despite their differences, Naturopathy and Allopathy also have a lot in common. Some of their similarities have been tabled below:

Both Naturopaths and Allopathic Doctors are…

- Highly trained health care professionals.
- Utilise science and evidence based treatments and techniques.
- Prime contact health practitioners.
- Rely on a network of allied health professionals to fully service patients.
- Have a profound responsibility for the well-being of their patients.
- Hold a position of trust with their patients and within the community.
- Can significantly influence the economy of the nation.
HOW NATUROPATHY HAS DEVELOPED

In recent decades and especially with the advent of and advances in the science of biological chemistry, the face of Naturopathy has largely changed.

Traditionally, Naturopathy is a very old science which finds its origins in ancient wisdom and well tried and proven natural medicines and procedures. Whilst many of these traditional treatments remain part of the Naturopathic repertoire, they have been very much overtaken by modern, scientifically based and proven treatments.

With the discovery, research and subsequent understanding of the roles of vitamins, minerals and amino acids, in human biochemistry, Naturopathy has moved well beyond its “folk-lore” origins and is now a fully-fledged, modern health science.

In Australia, Naturopathy began with the knowledge and skills of new arrivals, trained in the traditions of Naturopathy in Europe. As public acceptance and demand for this safe and effective alternative healthcare became established, private schools of Naturopathy began to emerge.

At first, these schools varied enormously in both the quality and content of their curricular. However, as Naturopaths organised themselves and formed professional associations, dedicated to the promotion of their profession, self-regulation emerged. Associations began to demand minimum acceptable standards of qualification for practicing Naturopaths, together with suitable standards of ethics and professional practice. Schools were obliged to lift their standards constantly to meet the progressing demands and requirements of the Naturopathic associations.

In reflection of these advances, Naturopaths in Australia are now recognised and accepted as Health Providers by all major Health Insurance Funds, the ATO and statutory bodies such as WorkCover, TAC etc.

In recent years, Naturopathy has come of age with the inclusion of Degree courses in Naturopathy, in several universities throughout Australia. RMIT has established research into Traditional and Complementary Medicine, setting out to evaluate quality, efficacy and safety of natural medicine; to illustrate mechanisms of actions of natural medicines and to promote public awareness of evidence based natural medicines in clinical practice.

Research into nutrition and disease is just one of the many fields of scientific research endeavour upon which the science and profession of Naturopathy draws. As practicing Naturopaths we are acutely aware of the massive volume of research papers and data which become available to us almost on a daily basis.
ACCEPTANCE

Acceptance of Naturopaths and Naturopathy in general has increased radically in recent years.

PUBLIC ACCEPTANCE

The public are increasingly leading the way by exercising their right in choosing a Naturopath for the day to day health care needs of their family. They have become comfortable with the role of Naturopathy in complementing mainstream medicine.

COLLEGES & UNIVERSITIES

In recent years, private Naturopathic colleges have grown in size and obtained government accreditation for their courses due to the public’s increased interest and use of Naturopathic services. In fact, many of these institutions now offer Advanced Diplomas of Naturopathy, together with degrees issued from many mainstream universities. These courses and awards are all government accredited by the relevant state government departments [VETAB – VETEC etc] in consultation with the profession.

HEALTH FUNDS

Private health fund members now expect their funds to offer rebates for Naturopathic services. Consequently, there are now in excess of 40 major health funds throughout Australia, providing rebates under policies developed in consultation with Naturopathic associations. Health Funds issue Provider Numbers to qualified and insured, Naturopathic Practitioners who conform to agreed standards of professional practice.

PROFESSIONAL INDEMNITY INSURANCE UNDERWRITERS

Several years ago, insurance company actuaries, who constantly monitor and assess risk factors, have recognised the safety of Naturopathic treatments and have reduced the already low fees levied for Professional Indemnity Insurance for Naturopathic practitioners. They see Naturopathy in the hands of qualified Naturopaths, as an extremely low risk, safe and professionally delivered health modality.
GOVERNMENT AUTHORITIES

Therapeutic Goods Administration

The Federal Therapeutic Goods Administration (TGA) has in effect recognised Naturopaths, in accepting them within Schedule 1 of the Regulations to The Therapeutic Goods Act. This exempts Naturopaths from specific therapeutic goods advertising restrictions, under an agreed policy with the profession.

After more than twenty years of monitoring adverse reactions to Naturopathic treatments, the TGA has found a remarkably low number of incidences of such reactions.

Australian Taxation Office

Following the exemption from the GST of professionally provided health care services, the Australian Taxation Office has, also under an agreed policy with the profession, officially recognised Naturopaths as ‘health care professionals’. Naturopathic consultations are thus GST free.

WorkCover Authorities

For some years now, WorkCover has recognised Naturopaths, allocating them provider numbers as legitimate health care professionals.

MEDICAL PROFESSION

Driven primarily by the increasing public acceptance of Naturopathy, many medical practitioners, who in the past may have advised their patients against it, are now prepared to actually refer patients to Naturopaths for appropriate complementary therapies.

Similarly, it is normal procedure for Naturopaths to refer patients on to other health care professionals, including Allopathic doctors, when indicated. This is part of the mandatory rules for Best Practice embraced by CMA members and is also included in the CMA Code of Ethics. Similar procedures exist in the guidelines of other Naturopathic associations.

Today, many General Practice Medical Clinics in Australia now include the services of Naturopaths as part of their integrated health care facilities for their patients.
SUMMARY

We are aware that you must have many submissions to read and to assess in this “Review of the Australian Government Rebate on Private Health Insurance for Natural Therapies”. We are also aware that many of these submissions will be lengthy and some will have substantial attachments. Rather than burden you with volumes of information, we have elected to state our case relatively briefly and we feel, pertinently.

We have pointed out that Naturopathy has established itself in Australia over many years as a safe and reliable, complementary therapy. Using preventative health strategies, Naturopathy improves the quality of life for many Australians, educating and empowering the patient to improve and maintain their health. This strategy saves the public funded healthcare system large sums of money by decreasing the community’s reliance on drugs such as NSAIDs as well as reducing the load on medical and hospital resources.

However, our simplest and most impelling argument for the maintenance of the Australian Government Rebate on Private Health Insurance for Naturopathic Consultations is public safety.

PUBLIC SAFETY – THE MOST IMPELLING FACTOR OF ALL

In Australia, despite the fact that we have strived for several decades to have legislation enacted to have Naturopathy regulated under a statutory “peer group registration system”, to this day Naturopathy is still not a “registered health profession”. The major difficulty caused by this situation is that anyone, whether qualified or not, can call themselves a Naturopath. We are aware for instance, of people who have simply done a weekend workshop with a multi-level marketing company selling vitamin and herbal formulae, calling themselves Naturopaths.

The inherent dangers of this situation are many and very real.

When a patient attends a properly qualified, professional Naturopath, such a practitioner is well trained and experienced to recognise and assess the patient’s presenting symptoms. The professional Naturopath will then offer appropriate treatment and advice, will keep proper records and will monitor the patient’s progress. The professional Naturopath will also refer the patient to other health care practitioners, such as Allopathic doctors, when indicated.

However, if that same patient attended an unqualified person who illegitimately calls themselves a Naturopath, the patient’s presenting symptoms may not be recognised or understood and especially in the case where the presenting symptoms suggest a serious issue,
the patient may not be appropriately referred to an Allopathic doctor in time, if at all. The potential danger of this situation cannot be understated.

In the current system of self-regulation under which Naturopathy functions in Australia, one of the very few means by which the public can identify a properly qualified Naturopathic Practitioner is by their Provider Number, which is issued by the Private Health Insurance Funds. Although many people do not have and perhaps cannot afford “Extras Cover” with their Private Health Insurance, they can still call upon the practitioner’s Provider Number as a reassurance that the health care practitioner, whose advice and help they are seeking, is a properly qualified and professional Naturopath.

The withdrawal of Government Rebate on Private Health Insurance for Naturopathic Consultations would result in the dropping of provider numbers for properly qualified Naturopaths and the loss of this simple, but highly effective means of ensuring that the public can have confidence in the credentials of their chosen health care practitioner. This is a genuine issue of public safety.

Given that Naturopathy provides a very real and substantial benefit to public health and that it does so at no cost to Medicare and minimal cost to the Private Health Insurance Funds, there is in fact very little to gain and a lot to lose, if provider status for Naturopaths is withdrawn.

We thank you for taking the time to read this submission and we ask you with respect and with genuine concern, to please maintain the Government Rebate on Private Health Insurance for Naturopathic Consultations.

Thanking you in anticipation,

Alan Stubenrauch,
Federal President,
Complementary Medicine Association

*For and on behalf of our member practitioners, our patients and the people of Australia.*