

## **MEDICAL BOARD OF AUSTRALIA (MBA)**

***Public consultation on clearer regulation of medical practitioners who  
provide complementary and unconventional medicine and emerging  
treatments***

**Submission from**

**The Australian Naturopathic Practitioners Association**



***Excellence, Leadership and Integrity in Naturopathic Health Care***

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*The Australian Naturopathic Practitioners Association (ANPA) is pleased to make a submission on the regulation of medical practitioners who provide complementary and unconventional medicine as well as emerging treatments.*

### **About the Australian Naturopathic Practitioners Association (ANPA)**

The ANPA was founded in 1975 and is a national association. The ANPA is the only professional association that only has naturopaths as members. We advocate for the naturopathic profession at all levels of government; local, state, federal as well as internationally. A minimum education of a Bachelor of Health Science (Naturopathy) is the current approved entry standard for ANPA membership. However, we have many members with higher tertiary qualifications. The ANPA strictly enforces a Code of Ethics as well as the National Code of Conduct for Unregistered Health Care Workers. The ANPA ensures the philosophy of naturopathy is protected. This philosophy underpins the profession of naturopathy and has been in existence since the turn of the century. Naturopathy offered by well-trained practitioners has offered solutions for acute as well as many chronic health conditions for more than one hundred years. Naturopathy continues to be an art informed by science. Naturopathy practice is guided by fundamental tenets – these include: Harnessing the Healing Power of Nature, First doing No Harm, Finding the Cause (not only treating the symptom), Educating and Empowering the patient, Preventative strategies, and Treating the Whole Person (not their disease label). For many years the ANPA has lobbied and made submissions to the government to include the naturopathic profession under the National Regulation and Accreditation Scheme (NRAS) with other registered health professionals. We have demonstrated to the government that we fit the criteria for a registered profession.

### **ANPA's Position**

**The ANPA supports Option 1**: the MBA's current *Good Medical Practice Code of Conduct* for Doctors who provide complementary medicine to patients. We note that that the proposal of additional or separate regulations for medical practitioners who provide complementary medicine is *unclear and ambiguous*. There needs to be clarity for medical practitioners who choose to provide these services within their scope of practice.

***ANPA's support is based on the proviso that the following requirements are adopted and agreed upon by the MBA for any medical practitioner to provide CAM services to the public.***

1. That an **education curriculum pathway** is enforced for any general practitioner who wants to offer CAM to the public. The pathway to this curriculum be approved by external subject/modality experts. For example if the general practitioner chooses to prescribe herbal or nutritional medicine then both of those modalities would require

education standards no less than that of graduate of a Bachelor of Naturopathy program. Herbal and Nutritional medicine are both ingestible substances. Both modalities have extensive education to fully understand their application, history, safety and relationship to herb-drug or nutrient-drug interactions. General practitioners who use these modalities should in addition be required to meet annual Continuing Education points in their chosen modality.

2. **Medicare** creates a **specific item number** for general practitioner offering a Complementary Medicine Consultation. At present general practitioners are offering Complementary Medicine consults under a general Medicare code. This does not differentiate what kind of consultation is being offered. In fact, Medicare has been paying for Complementary Medicine consultations for many years offered by general practitioners while formally trained Naturopaths have in many cases higher quality education and have received no government support when offering high quality care to the public. There has been no monitoring of the quality of the care being provided to the public nor the standard of education of the general practitioner providing this health service. All general practitioners offering complementary medicine consultations and prescribing natural medicines need to attain education and qualifications that are equivalent to those required by members of complementary and alternative medicine professional associations.
3. General practitioners who meet the education criteria to practice complementary and alternative medicine are required to seek **membership of an appropriate complimentary professional association**; ensuring minimum professional education requisites are maintained. General practitioners who want to be members of the ANPA would be required to complete the requisites of any naturopathy practitioner wanting to join the ANPA.

The ANPA is supportive of the public accessing quality health care from general practitioners who have achieved minimum education standards in their chosen modality. There is significant evidence in the areas of herbal and nutritional medicine, naturopathy, and lifestyle interventions.

We are pleased to offer the Medical Board of Australia support from **independent subject matter experts** when pathways for education for general practitioners are in the planning stages. The ANPA expects rigorous education standards are implemented.

The ANPA is pleased to collaborate with the MBA and would be willing to provide expertise in Naturopathy and Natural Therapies to the MBA review panel.

We look forward to supporting the MBA in reaching a positive outcome for the review. Australian general practitioners deserve choice in the health service they provide in line with international standards.

Australia is a signatory to the World Health Organisation (WHO). The WHO approves the use of Traditional and Complementary medicine across the globe. Complementary and Traditional medicine is the way of the future.

The MBA would be in alignment with international trends supporting and approving the extended scope of practice for general practitioners who want to meet the needs and expectations of Australians seeking complementary and alternative medicine care.