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Submitted to ANZSCO comprehensive review - consultation round 3
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3 What is your organisation?

Organisation:
Naturopaths & Herbalists Association of Australia

8 How did you find out about the Comprehensive review and update of ANZSCO?

Direct approach from the Australian Bureau of Statistics (ABS), Stakeholder network

Other (please specify):

Focus area

9 Please select a focus area

Personal and other services

Occupations that are separately identified in ANZSCO

10 Are there any occupations in your industry, business or workplace that are not accurately described?

Details of occupations in your industry, business or workplace that are not accurately described:

451513 Herbalist (Western)

1.

Definition: provides a system of health care to apply herbal medicines that contain active constituents to prevent and treat illness and disease (1).
Other titles: Western Herbal Medicine Practitioner; Clinical Herbalist

Minimum education level is AQF level 7 Bachelors degree. This level of qualification is necessary to ensure graduates have the ability to work autonomously to address complex health conditions, have the ability to self-direct work and highly developed judgement skills (2).

Herbalist (Western) practitioners are accredited for practice via a Professional Association membership.

2.

Tasks involved align with Unit group 2522 Complementary Health Therapists.

- assessing patients to determine the nature of the disorder, illness, problem or need by questioning, examining and observing
- developing and implementing treatment plans using herbal medicine applications including food as medicine and bespoke therapeutic herbal formulations.
- evaluating and documenting patients' progress through treatment plans
- providing basic dietary and lifestyle advice and guidelines
- prescribing natural medicines, such as herbal extracts, to stimulate the body's capacity for self-healing

Herbal therapist job role tasks do not align with the current category of 4515 Personal and Other services.

3.

Two changes are recommended:

- a. Occupation categorisation update from 4515 Personal Care Consultants to Allied Health category: 2522 Complementary Health Therapists
- b. Skill level change from level 4 to level 1

Evidence to support the recommended changes:

Western herbal medicine practitioners are highly trained undertaking a 3-year undergraduate Health Science degree. Torrens University Australia delivers the only Bachelor of Health Science (Western Herbal Medicine) qualification available in Australia:

<https://www.torrens.edu.au/courses/health/bachelor-of-health-science-western-herbal-medicine>

This standard of education aligns with the Australian Government recommendation for bachelor's degree as the minimum educational standard. Bachelor as the minimum standard of education was implemented in 2019 when the Advanced Diploma qualifications were taught out in December 2018 (3). This was recommended by the Community Services and Health Industry Skills Council (CSHISC) who withdrew support for the Advanced Diploma Western Herbal Medicine, and recommended that Australian Qualifications Framework Level 7 (bachelor's degree) aligns with the needs of the profession. The recommendations were accepted by the Complementary & Alternative Health Industry Reference Group in May 2014. This alignment to bachelor's degree was agreed upon by the majority of key professional bodies, led by the Naturopaths & Herbalists Association of Australia (NHAA). Ensuring Skill Level 1 is enforced is critical to ensure safe and effective herbal medicine practice (4).

Currently, the Herbal Medicine profession in Australia is self-regulated through several professional peak bodies, the NHAA being the peak professional body for Herbalists since 1920. Based on the potential for public health risk, the NHAA and the Australian herbal medicine profession, will join the naturopathic effort to lobby for professional registration within the next 5 years (4). Evidence of naturopathic and herbal medicine efficacy, safety and economic viability is available via the Health Technology Assessment (HTA), a 720-page publication (5). Chapter 32 specifically refers to Herbal Medicine. The full HTA is available as an e-book at: <https://worldnaturopathicfederation.org/project/health-technology-assessment-naturopathy/> The level of qualification and job tasks clearly align with Allied Health, Complementary Therapy category.

4.

The Australian Herbal workforce is estimated to be around 6,000 practitioners. The Naturopathic workforce is estimated to be around 15,000 practitioners. We estimate approximately 4 million naturopathic consultations are conducted annually (6,7).

Misrepresenting the profession to the public impacts the credibility of the profession by not reflecting the high standards of education required for safe and effective practice. Bachelor standard requires graduates to develop critical thinking and decision-making skills required for complex, independent and integrative practice.

Additionally, clinical herbalists are highly trained regarding managing herb/drug interactions. This is an important aspect of ensuring herbal medicine is safely prescribed. Correctly classifying the profession under allied health correctly represents the profession to the public.

11 Are there any occupations in your industry, business or workplace for which ANZSCO does not accurately reflect the skill level (1 to 5)?

Occupations which do not accurately reflect the skill level (1 to 5):

1. N/A
2. N/A
3. N/A

12 Are there any occupations in your industry, business or workplace which we should consider classifying under a different ANZSCO category (e.g. sub-major, minor or unit group)?

Occupations to classify under a different ANZSCO category:

1.

We strongly recommend the profession is removed from the 4515 Personal Care Consultants category.

The Western herbal medicine profession is accurately categorised as Allied Health: 2522 Complementary Health Therapists category.

The current occupation categorisation undermines the decision of the Australian Government Community Services and Health Industry Skills Council (CSHISC) to remove the qualifications from Vocational sector education. The scope of practice of western herbalist is not accurately represented in the category of Personal Care Consultant described as providing natural relaxation and health treatments such as weight loss.

The scope of practice of western herbalists aligns to the category of Allied Health Therapists; 2522 Complementary Health Therapists who “treat patients for a range of physical, mental and emotional needs by considering the whole person rather than focusing on specific symptoms”. Herbal Medicine is a primary health profession that treats a broad range of health conditions including acute, chronic and emerging health conditions. Safe implementation of herbal medicine requires a highly skilled workforce, that can competently work with medical and other allied health professionals to collaboratively address complex health conditions.

2.

The Herbal Medicine profession in Australia is self-regulated by the NHAA and other professional bodies. Based on the potential for public health risk, the herbal medicine profession will join the naturopathic effort to lobby for professional registration within the next 5 years (4). Evidence of naturopathic efficacy, safety and economic viability is available via the Health Technology Assessment (HTA), a 720-page publication (5). Chapter 32 specifically refers to Herbal Medicine practice. The full HTA is available as an e-book at:

<https://worldnaturopathicfederation.org/project/health-technology-assessment-naturopathy/>

Herbal Medicine higher education course growth in the last 6 years is approximately 250%. The number of people expected to undertake the occupation in the next 5 to 10 years is 500 people. This projection is based on the enrolment figures of the only Australian Bachelor of Health Science (Western Herbal Medicine) course delivered by Torrens University Australia (8). These estimates indicate a future strong growth in the herbal medicine profession. Accurate recognition of this specialised profession is essential.

Occupations not separately identified in ANZSCO

13 Are there any occupations in your industry, business or workplace that should be separately identified with a unique code?

Occupations that should be separately identified:

1. N/A
2. N/A
3. N/A
4. N/A

14 Are there occupations that are emerging, or that you anticipate will emerge, in the next 5 to 10 years in your industry, business or workplace?

Occupations that are emerging:

1. no
2. no
3. No
3. No

Other information

15 Is there any other information to help support your submission?

Other information to support submission:

This submission represents the views of collective industry bodies and educators who are members of the Australian Naturopathic Council (ANC). The purpose of the ANC is to support the quality, viability and sustainability of the naturopathic profession in Australia. Representatives are:

- Australian Register of Naturopaths and Herbalists (ARONAH)
- Complementary Medicine Association (CMA)
- Endeavour College of Natural Health (ECNH)
- Naturopaths and Herbalists Association of Australia (NHAA)
- Southern Cross University (National Centre for Naturopathic Medicine) (SCU)
- Torrens University Australia

16 Please provide information on any other issues in relation to ANZSCO that have not already been covered in this survey.

Any other issues not already covered:

It is recommended that the Allied Health Category 2522 Complementary Health Therapists be updated to “Traditional, Complementary and Integrative Health Therapists”. This inclusive terminology represents contemporary classification initiated by the World Health Organisation. In August 2023, the First Traditional Medicine Summit took place in India, this re-focus on traditional medicine systems reflects the scope of the complementary medicine category that includes: Acupuncturists, Homoeopaths, Naturopaths, Herbalists, Traditional Chinese Medicine Practitioners, Traditional Maori Therapists. The WHO Traditional Medicine Strategy 2014-2023 is currently under review and will be informed by the First WHO Traditional Medicine Global Summit (9).

Traditional and Complementary Therapists are increasingly integrated with medical health systems providing person-centred health treatments that contribute to health prevention and wellness strategies as well as specific complex health conditions that affect the community (10). This movement is likely to gain momentum in the near future through active lobbying and advocacy (11).

We appreciate the ABS considering the renaming of 2522 Complementary Health Therapists category to reflect contemporary and inclusive terminology.

FILE ATTACHMENTS

1. Niemeyer K, Bell IR, Koithan M. Traditional knowledge of Western herbal medicine and complex systems science. *J Herb Med.* 2013 Sep;3(3):112–9.
2. Australian Qualifications Framework Council. Australian qualifications framework. [Internet]. Vol. 2nd edition. 2013 [cited 2023 Nov 6]. Available from: <https://www.aqf.edu.au>
3. Frawley J. Bachelor Degree the Minimum standard 2014. *Australian Journal of Herbal Medicine.* 2014;28(3):84.
4. Wardle J, Steel A, Casteleijn D, Bowman D. An evidence-based overview of naturopathic practice in Australia. *Australian Journal of Herbal and Naturopathic Medicine.* 2019;31(1):9–14.
5. Lloyd I. Naturopathy: Practice, Effectiveness, Economics and Safety [Internet]. Steel A, Wardle J, editors. World Naturopathic Federation: Toronto. Toronto: World Naturopathic Federation; 2022 [cited 2023 Aug 11]. Available from: <https://worldnaturopathicfederation.org/project/health-technology-assessment-naturopathy/>
6. Australian Naturopathic Council. What is Naturopathy? [Internet]. [cited 2023 Aug 10]. Available from: <https://www.naturopathiccouncil.org.au/what-is-naturopathy/>
7. McIntyre E, Adams J, Folley H, Harnett J, Leach MJ, Reid R, et al. Prevalence of Use and Characteristics. *J Altern Complementary Med.* 2019;25(2):181–8.
8. Smith C, Shew T, McLachlan C. Torrens University - TCM education provider in Australia. *Int J Ayurveda Res.* 2022;3(2):155.
9. World Health Organisation. The First WHO Traditional Medicine Global Summit [Internet]. 2023 [cited 2023 Nov 6]. Available from: <https://www.who.int/news-room/events/detail/2023/08/17/default-calendar/the-first-who-traditional-medicine-global-summit>
10. Ng JY. Insight into the characteristics of research published in traditional, complementary, alternative, and integrative medicine journals: a bibliometric analysis. *BMC Complement Med Ther.* 2021 Dec 1;21(1).
11. Traditional Complementary Integrative Healthcare. The People's Declaration for Traditional, Complementary and Integrative Healthcare [Internet]. [cited 2023 Nov 6]. Available from: <https://www.tcih.org>