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Submitted to **Public Consultation on Australia's Next Antimicrobial Resistance Strategy 2020 and Beyond**
Submitted on **2019-06-26 12:30:58**

Introduction

i Please click yes or no to the following statement: 'I consent to the Department collecting the information requested in the Consultation Hub about me, including any sensitive information, for the purposes indicated above.'

Yes

ii What is your name?

Name:

David Casteleijn

iii What is your email address?

Email:

d.casteleijn@nhaa.org.au

iv What is your organisation?

Organisation:

Naturopaths and Herbalists Association of Australia

v Please click yes or no to the following statement: 'By making a submission, I acknowledge that: I understand that the giving of my consent is entirely voluntary; I am over the age of 18 years; I understand the purpose of the collection, use, publication or disclosure of my submission; I understand that copyright in the content of my submission will vest in the Commonwealth of Australia; Where relevant, I have obtained the consent of any individuals whose personal information is included in my submission, to the Department collecting this information for the purposes outlined in this notice.'

Yes

vi Please click yes or no to the following statement: 'I consent to the submission made by me being published on the Consultation Hub and accessible to the public, including persons overseas.'

Yes

vii If you answered yes to Question 6, please click yes or no to the following statement: 'If my submission is published on the Consultation Hub, I consent to being identified in the published submission.'

Yes

viii At this point you can choose to either upload a completed submission template and stocktake of activities table using the templates in the list of relevant documents or proceed through to the same set of questions in the Consultation Hub. Remember to refer to the consultation paper when considering the questions.

Browse to upload file:

NHAA AMR Submission 2019.docx was uploaded

Future Direction of the Strategy

1 Are there other focus areas beyond environment, food and other antimicrobials which also need to be included in the next Strategy? If so, please explain?

1. Are there other focus areas beyond environment, food and other antimicrobials which also need to be included in the next Strategy? If so, please explain?:

The overall future direction is appropriate but important to ensure that strategic goals are truly encompassing the principles of One Health, which includes considering all valuable contributions within the health system. To date, the potential role of naturopaths and herbalists in combating AMR has been overlooked and we feel the next strategy should provide explicit scope for considering not only new treatments but also the contribution of all health professionals serving the community.

Please note that reference to herbalists throughout this document is to Herbalists practicing Western herbal medicine as represented by the Naturopaths and Herbalists Association of Australia (NHAA)

2 Do you agree with the overarching framework considered by ASTAG (Figure 1 in the consultation paper)? Please explain your answer.

Do you agree with the overarching framework considered by ASTAG (Figure 1)? Please explain your answer:

Yes, we agree that the overarching framework is appropriate with the caveat of the need for explicit inclusion of all health professionals as mentioned above.

Incorporating Environment into the next AMR Strategy

3 How do we best incorporate the environment into the next Strategy, which will extend over the next 20 years?

How do we best incorporate the environment into the next Strategy, which will extend over the next 20 years?:

Climate change, deforestation. Potential solutions to AMR being found in the natural world. Habitat and species extinction. There is evidence that a wide range of medicinal plants and other naturally occurring substances have anti-microbial activity, or the ability to stimulate endogenous immune responses. As environmental destruction continues, we may compromise our ability to identify, access and sustainably use such potential treatments in the future. As naturopaths and herbalists we have knowledge of a range of traditionally used medicinal plants and substances. We also acknowledge the traditional knowledge of indigenous communities around the world who may also be able to assist in identification of potentially useful plants and substances.

4 What are the current challenges to incorporate the environment into the next Strategy?

What are the current challenges to incorporate the environment into the next Strategy?:

The approach of bioprospecting rather than engaging meaningfully with custodians traditional knowledge may mean we are undervaluing the importance of delicate ecosystems as it relates to medicinal plants and substances.

5 Are you aware of any organisations or experts that would be relevant to AMR and the environment context?

Are you aware of any organisations or experts that would be relevant to AMR and the environment context?:

Dr Erica McIntyre (<https://www.uts.edu.au/staff/erica.mcintyre>) - Planetary Health and herbalist

6 What would you consider the priority areas for action in relation to the environment?

What would you consider the priority areas for action in relation to the environment?:

Climate Action to preserve habitats described above

7 Are there any existing programs/projects/policies that could provide an 'entry point' for deeper environmental impact?

Are there any existing programs/projects/policies that could provide an 'entry point' for deeper environmental impact?:

Vision & Goal

8 Does the Vision remain appropriate for the next longer term Strategy? If not, do you have any suggestions for a revised 20 year vision?

Does the Vision remain appropriate for the next longer term Strategy? If not, do you have any suggestions for a revised 20 year vision?:

Yes, we support.

9 Is a Vision and a Goal still required? If both are required, does the Goal remain appropriate, or if not, what are your suggestions for a revised goal?

Is a Vision and a Goal still required? If both are required, does the Goal remain appropriate, or if not, what are your suggestions for a revised goal?:

Yes, without a vision and goal there is a risk that the strategy would become unfocused

10 What does success look like for Australia in responding to the threat of AMR?

In your own words, what does success look like for Australia in responding to the threat of AMR?:

Objectives

Objective 1: Increase awareness and understanding of antimicrobial resistance, its implications and actions to combat it, through effective communication, education and training

11 For your organisation/sector please describe your achievements, your challenges and what you see as your next steps.

a. Describe your achievements:

Naturopaths and herbalists are among the health professionals accessed by the community with chronic health complaints and are commonly providing services to individuals who are non-responsive to conventional pharmaceutical medication. We have identified that it is important that all naturopaths and herbalists are trained to a minimum requirement of a Bachelor degree and that this training includes detailed knowledge and deep skills in non-pharmaceutical antibacterial medicines (e.g. herbal medicines). We also require naturopaths to be trained in diet and lifestyle counselling to improve overall health and wellbeing, including improving resistance to infection.

Naturopathy is underpinned by an educational approach to improving patient understanding of factors they can change which can affect susceptibility to infection. Educating the patient is a core pillar of Naturopathic practice which aims to improve health literacy and facilitate self-responsibility and to this end through our collaboration with the World Naturopathic Federation (WNF) the NHAA has been involved in a public campaign <https://www.wnf-amr.org/> to raise awareness of the AMR and what people can do on a personal level

Engaging with Naturopaths is important to access the entire population. Approximately 6.2% of Australians have consulted with a naturopath in the previous 12

months, and half of naturopathic patients visit their naturopath for most of their health issues and 59.6% use their naturopath as their primary provider with 22.2% as their sole primary care provider and 37.1% as the primary provider in conjunction with other health providers (e.g. GPs) used in a secondary capacity. The NHAA has been very active in advocating for minimum standards of naturopathic and herbal medicine education. Since 2015 the minimum government recognised qualification to be a Naturopath has been a four year degree, and the NHAA continues to lobby for professional registration to ensure that only practitioners who meet the minimum education standard are able to use the term Naturopath.

b. Describe your challenges:

Lack of Registration for the Naturopathic and Western Herbal Medicine professions is a significant challenge as this allows people to represent themselves as Naturopaths and Herbalists despite having insufficient education as decreed by the government as of 2015

c. Describe what you see as your next steps:

More specific training requirements in AMR within training guidelines. Professional development opportunities for members.

12 Is this objective still appropriate for Australia's next AMR Strategy for 2020 and beyond? If not, how would you refine it? Please consider the ASTAG consultation outcomes in your answer

Is the objective still appropriate for Australia's next AMR Strategy for 2020 and beyond? If not, how would you refine it? Please consider the ASTAG consultation outcomes in your answer:

Very appropriate

13 Are the current Priority Areas for Action under this Objective still relevant for 2020 and beyond? If not, what else would you include?

Are the current Priority Areas for Action under each Objective still relevant for 2020 and beyond? If not, what else would you include?:

Naturopaths and herbalists focus on prevention, assessment and health promotion with natural treatment approaches, therefore should be considered as key participants for action.

Objective 2: Implement effective antimicrobial stewardship practices across human health and animal care settings to ensure the appropriate and judicious prescribing, dispensing and administering of antimicrobials

14 For your organisation/sector, please describe your achievements, challenges and what you see as your next steps.

a. Describe your achievements:

The NHAA acknowledge that judicious prescription requires that health professionals are aware of the available options to prescribe, dispense or administer in place of pharmaceutical antimicrobials.

The role naturopaths and herbalists can have in educating other health professionals and the community about other interventions to improve individual innate immunity and provide direct antimicrobial activity. Examples of forums where the current evidence for such interventions have been explored includes EUROCAM (see 23a).

Naturopathic and Western Herbal Medicine strategies are most often preventive and curative health promotion strategies. Naturopathic and Western Herbal Medicine concepts of health (promotion) agree with current conceptualisation of health and there is evidence that Naturopathic and Western Herbal Medicine prevention and treatment strategies may be effective and safe.

b. Describe your challenges:

Insufficient interprofessional collaboration pathways. Lack of professional Registration limits the ability for conventional health providers to collaborate in some settings.

Many Naturopathic and Western Herbal Medicine treatment strategies (e.g., for respiratory and urinary tract infections) are promising. More rigorous research is necessary to provide high quality evidence of safety and (cost-)effectiveness of Naturopathic and Western Herbal Medicine strategies.

There are several Naturopathic and Western Herbal Medicine medicinal products for: acute RTIs (e.g. *Pelargonium sidoides*, *Andrographis paniculata*), acute rhinosinusitis, acute tracheobronchitis, acute URTI, bronchiolitis, cough, Influenza A, otitis media and sore throat, that demonstrate positive effects on symptom relief and are safe, according to the conclusions of a number of systematic reviews. However, several authors describe that the quality of the included studies in the SR is often low or unclear and several systematic reviews themselves have methodological shortcomings. Nevertheless, given the urgent need for non-antibiotic alternative treatments to reduce inappropriate antibiotic use for RTIs, promising Naturopathic and Western Herbal Medicine treatments with positive effects and evidence of safety demonstrated in systematic reviews, that are readily available on the European market in a good-quality product, can be used by doctors and patients, for example as part of a delayed prescription strategy to control symptoms of uncomplicated acute RTIs.

c. Describe what you see as your next steps:

Establishing stronger collaborative relationships with other health professionals. Contribute to conversations at a regulatory level and be part of the ongoing implementation of AMR strategy in Australia.

The NHAA could be proactive in enhancing Naturopathic integration of support mechanisms which align with appropriate and judicious prescribing and dispensing and administration of antibiotics, improve health literacy and facilitate self-responsibility.

Improve understanding of the difference between a cold and flu .. Often, those affected by a cold, sore throat, ear infection, cough or bronchitis feel frustrated that their symptoms are interfering with daily life and making them miserable. People frequently store unused antibiotics, borrow them from family and friends, use antibiotics intended for animals and decide without medical advice whether to take them. For many of these situations where Antibiotics are not warranted Naturopaths could provide viable alternatives, even simple things like recommending rest or staying away from work and so limiting the spread of infection. These are all areas Naturopaths and Herbalists can be involved and support the overall AMR project.

15 Is this objective still appropriate for Australia's next AMR Strategy for 2020 and beyond? If not, how would you refine it? Please consider the ASTAG consultation outcomes in your answer.

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Yes

16 Are the current Priority Areas for Action under this Objective still relevant for 2020 and beyond? If not, what else would you include?

Are the current Priority Areas for Action under each Objective still relevant for 2020 and beyond? If not, what else would you include? :

Ensure Naturopaths and Herbalists are brought to the table as key participants in supporting appropriate and judicious use of Antimicrobials, through the exploration of natural treatment options.

Objective 3: Develop nationally coordinated One Health surveillance of antimicrobial resistance and antimicrobial usage

17 For your organisation/sector, please describe your achievements, challenges and what you see as your next steps.

a. Describe your achievements:

The One Health concept recognises that human, animal and ecosystem health are inextricably linked and that achieving optimal health outcomes for people and animals requires the cooperation of the human, veterinary, and environmental health communities. These principles are strongly aligned with the principles of Naturopathy which emphasises the connected nature not only with in these varied environmental systems but also within the individual.

A naturopathic assessment is more than just diagnosing the disturbing symptom or condition it involves three main aspects: identifying the current condition including the health risk and progression; determining the vitality or healing potential of the person involved; and equally important determining the causal factors that initiated or aggravate the condition(s). Naturopathic assessment processes may also mean that instances of AMR that have previously been poorly identified may be identified by a naturopath or herbalist.

b. Describe your challenges:

Integration within wider health system frameworks, operating on the fringe creates barriers to our ability to contribute to the shared effort of AMR surveillance

c. Describe what you see as your next steps:

Embracing the Naturopathic focus on prevention and identifying underlying cause.. By identifying why a person may be getting recurrent infections and addressing that as an example the need to antimicrobial treatment could be reduced.

Providing the opportunity or access for naturopaths and herbalists to report instances of AMR into the One Health surveillance systems as they are developed, when individuals with AMR (or suspected AMR) present in a clinical setting.

18 Is this objective still appropriate for Australia's next AMR Strategy for 2020 and beyond? If not, how would you refine it? Please consider the ASTAG consultation outcomes in your answer.

Is this objective still appropriate for Australia's next AMR Strategy for 2020 and beyond? If not, how would you refine it? Please consider the ASTAG consultation outcomes in your answer. :

Yes

19 Are the current Priority Areas for Action under this Objective still relevant for 2020 and beyond? If not, what else would you include?

Are the current Priority Areas for Action under this Objective still relevant for 2020 and beyond? If not, what else would you include? :

Ensure Naturopathy and Western herbal medicine are recognised as a sector for inclusion in the national One Health surveillance system

Objective 4: Improve infection prevention and control measures across human health and animal care settings to help prevent infections and the spread of resistance

20 For your organisation/sector, please describe your achievements, challenges and what you see as your next steps.

a. Describe your achievements :

Naturopaths and herbalists place strong emphasis on encouraging a state of optimum health where resistance to infection is enhanced. This can be through a combination of diet and lifestyle factors particularly emphasizing a diet high in a colourful range of fruit and vegetables and regular exercise and fresh air and sunshine. All simple but effective ways to reduce the need for antimicrobials.

Naturopathy focus on lifestyle behaviours and dietary practices.

b. Describe your challenges:

The lack of Statutory Registration creates an environment where people with insufficient education can set themselves up as professionals in the area potentially providing misleading information and derailing efforts to work towards a common goal

c. Describe what you see as your next steps:

Assisting the Naturopathic and Western herbal medicine profession

May offer an avenue to train the community in healthy lifestyle habits that may impact on AMR

21 Is this objective still appropriate for Australia's next AMR Strategy for 2020 and beyond? If not, how would you refine it? Please consider the ASTAG consultation outcomes in your answer.

Is this objective still appropriate for Australia's next AMR Strategy for 2020 and beyond? If not, how would you refine it? Please consider the ASTAG consultation outcomes in your answer. :

Yes

22 Are the current Priority Areas for Action under this Objective still relevant for 2020 and beyond? If not, what else would you include?

Are the current Priority Areas for Action under this Objective still relevant for 2020 and beyond? If not, what else would you include?:

Include experts in Naturopathic and Herbal medicine practice in discussions about future research for resource and educational development

Objective 5: Agree a national research agenda and promote investment in the discovery and development of new products and approaches to prevent, detect and contain antimicrobial resistance

23 For your organisation/sector, please describe your achievements, challenges and what you see as your next steps.

a. Describe your achievements:

A team of researchers from several European universities has undertaken intensive research with respect to Naturopathic and Western Herbal Medicine treatments for respiratory infections and suggest some innovative tools which were presented and discussed at a recent European conference. EUROCAM and the research team recommend the testing and further development of these tools, as a pilot case for the potential of CAM in reducing the problem of AMR. This should be given serious consideration and further research should be carried out in this area.

Through our collaboration with the World Naturopathic Federation (WNF) the NHAA has been involved in a public campaign <https://www.wnf-amr.org/> to raise awareness of the AMR and what people can do on a personal level

The minimum standard education for naturopaths and herbalists is a bachelor degree, and many of the leading naturopathic education providers are now adopting research offices and offering post-graduate degrees by research to progress traditional and complementary medicine research.

b. Describe your challenges:

Funding is an ongoing challenge – naturopathic and complementary medicine research often relies on investments from product companies to support research Access

Appropriate testing methods (ensuring studies are designed with a detailed knowledge of traditional practices to maximise the capacity to identify effective treatments)

c. Describe what you see as your next steps:

Expert naturopaths and herbalists invited to contribute to the development of the national research agenda. Ethnobotanists, Pharmacognosists, e.g. Alvaro Viljoen from South Africa <http://www.alvaroviljoen.com/>

24 Is this objective still appropriate for Australia's next AMR Strategy for 2020 and beyond? If not, how would you refine it? Please consider the ASTAG consultation outcomes in your answer.

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Yes still appropriate

25 Are the current Priority Areas for Action under this Objective still relevant for 2020 and beyond? If not, what else would you include?

Are the current Priority Areas for Action under this Objective still relevant for 2020 and beyond? If not, what else would you include? :

The inclusion of expert Naturopathic and Herbal medicine professionals such as Ethnobotanists, Pharmacognosists in non pharmacological Antimicrobial options

Objective 6: Strengthen international partnerships and collaboration on regional and global efforts to respond to antimicrobial resistance

26 For your organisation/sector, please describe your achievements, challenges and what you see as your next steps.

a. Describe your achievements:

The NHAA is a member of the WNF which is leading the global naturopathic profession in research. The WNF aligns with the WHO, FAO and OIE initiative against antimicrobial resistance taking a key first step in a year-long campaign addressing one of WHO's leading global health issues.

WNF AMR initiatives are: <https://www.wnf-amr.org/>

Support your immune system

Identify the underlying cause

Explore natural treatment options

Avoid meat with antibiotics

Don't share antibiotics

Don't use antibiotics for viral infections

b. Describe your challenges:

To conduct and support research that strengthens naturopathic practice. To increase the research standards for the naturopathic profession globally.

To support the promotion of the naturopathic profession internationally and to ensure that the naturopathic profession is part of the conversation on global health issues.

c. Describe what you see as your next steps:

To establish official collaboration status with the WHO and with other international organizations. To build affiliations with other international Traditional, Complementary and Integrative medicine organizations

27 Is this objective still appropriate for Australia's next AMR Strategy for 2020 and beyond? If not, how would you refine it? Please consider the ASTAG consultation outcomes in your answer.

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Yes

28 Are the current Priority Areas for Action under this Objective still relevant for 2020 and beyond? If not, what else would you include?

Are the current Priority Areas for Action under this Objective still relevant for 2020 and beyond? If not, what else would you include? :

Embracing the Naturopathic focus on prevention and identifying underlying cause.. By identifying why a person may be getting recurrent infections and addressing that as an example the need to antimicrobial treatment could be reduced.

Providing the opportunity or access for naturopaths and herbalists to report instances of AMR into the One Health surveillance systems as they are developed, when individuals with AMR (or suspected AMR) present in a clinical setting.

Objective 7: Establish and support clear governance arrangements at the local, jurisdictional, national and international levels to ensure leadership, engagement and accountability for actions to combat antimicrobial resistance

29 For your organisation/sector, please describe your achievements, challenges and what you see as your next steps.

a. Describe your achievements:

Being a foundation member of the WNF

Whose main area of focus are:

Promoting accreditation and the highest educational standards for the global Naturopathic profession

Encouraging naturopathic research

Working with world agencies (World Health Organization, United Nations, UNESCO) and national governments and supra-national agencies

b. Describe your challenges:

Lack of Statutory Registration in the Australian context which makes it difficult for other bodies which may be interested in collaboration to know the appropriately trained Naturopaths and Herbalists

Naturopaths and herbalists don't have access to antibiotics and as such our ability to influence is based on our access to share our knowledge and expertise related to non-pharmaceutical AM

c. Describe what you see as your next steps:

In the absence of registration, ongoing education and support to members and the public.

30 Is this objective still appropriate for Australia's next AMR Strategy for 2020 and beyond? If not, how would you refine it? Please consider the ASTAG consultation outcomes in your answer.

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Yes

31 Are the current Priority Areas for Action under this Objective still relevant for 2020 and beyond? If not, what else would you include?

Are the current Priority Areas for Action under this Objective still relevant for 2020 and beyond? If not, what else would you include? :

Yes

Sector Specific Roles and Responsibilities

32 Are there other sectors that need to be considered as part of the next strategy?

Are there other sectors that need to be considered as part of the next strategy?:

The Naturopathic and Western Herbal Medicine sectors, considering their engagement with a significant proportion of the community with a clear focus on prevention, self-responsibility and health promotion

33 What do you see as your sector's role and responsibilities in Australia's response to AMR?

What do you see as your sector's role and responsibilities in Australia's response to AMR?:

Education of public and other health professionals about nonpharmacological solutions to AMR

Provide expert input on research agenda re nonpharmacological AMR options

Stocktake of Activities

34 Do you have any other comments that you want to make?

other comments:

Our main purpose in providing this submission is to outline the important role of naturopaths and herbalists in Australia to support primary healthcare for Antimicrobial resistance prevention and management. Opportunities of integration and collaboration between Primary Healthcare Networks with naturopaths and herbalists need to be examined and opportunities highlighted.

The NHAA is a peak professional association representing appropriately qualified naturopaths and herbalists. It is the oldest professional association of complementary therapists in Australia, founded in 1920. The NHAA represents approximately one third of practicing herbalists and naturopaths in Australia.

Please upload your completed Stocktake of Activities table.

Where relevant, please complete the Stocktake of Activities table to assist us to capture the huge amount of activity being undertaken by a wide range of organisations and sectors to address the priority areas of action outlined in the Strategy.:

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