

Response ID ANON-PR8U-2NE3-7

Submitted to **Draft National Preventive Health Strategy**

Submitted on **2021-04-19 15:11:30**

Introduction

1 What is your name?

Name:

Australian Naturopathic Council (ANC)

2 What is your email address?

Email:

admin@naturopathiccouncil.org.au

3 What is your organisation?

Organisation:

The following organisations make up the ANC: Australian Register of Naturopaths and Herbalists (ARONAH), Complementary Medicine Association (CMA), Naturopaths and Herbalists Association of Australia (NHAA)

VISION

4 Do you agree with the vision of the Strategy? Please explain your selection. (1000 word limit)

Strongly Agree

Vision Text:

The vision statement in the Draft National Preventive Health Strategy 2021–2030 places a high value on an equitable and preventive health care strategy across the lifespan and is supported by the Australian Naturopathic Council (ANC).

The vision aligns with the advocacy of the ANC and long term principles of the Australian naturopathic profession it represents, as well as the World Naturopathic Federation (WNF) and World Health Organisation (WHO), of which it is a member.

The preventative orientation of naturopaths contributes to alleviating the burden on public healthcare systems by promoting the health of consumers and preventing further movement into the healthcare system. The core philosophy of naturopathy incorporates the practice of preventive medicine and identification of the cause of illness in an individual, using nutritional and lifestyle measures by encouraging healthy behaviours, health literacy and self-responsibility (Foley et al., 2020a; Steel, Tiveron, et al., 2020).

References

Foley, H., Steel, A., & Adams, J. (2020). Consultation with complementary medicine practitioners by individuals with chronic conditions: Characteristics and reasons for consultation in Australian clinical settings. *Health & Social Care in the Community*, hsc.13072. <https://doi.org/10.1111/hsc.13072>

Steel, A., Tiveron, S., Reid, R., Wardle, J., Cramer, H., Adams, J., Sibbritt, D., & Lauche, R. (2020). Do women who consult with naturopaths or herbalists have a healthy lifestyle?: A secondary analysis of the Australian longitudinal study on women's health. *BMC Complementary Medicine and Therapies*, 20(1), 349. <https://doi.org/10.1186/s12906-020-03153-6>

AIMS

5 Do you agree with the aims and their associated targets for the Strategy? Please explain your selection. (1000 word limit)

Agree

Aims Text:

1) Australians have the best start in life

We agree that prevention in the first 25 years of life is critical to ensuring optimal health of the adult population at all life stages. However, we believe a focus on fertility and periconception support is also part of the aim to ensure the best start in life. The naturopathic profession in Australia places a high priority on fertility and periconception support (Steel, Schloss, et al., 2020), to provide both short- and long-term benefits to mother, father and baby. While comprehensive preconception services in Australia are limited and many primary care health professionals do not feel confident in providing preconception counselling (Hammarberg & Taylor, 2019; Steel et al., 2016), basic science, clinical and epidemiological research confirms that the periconception period is critical to life course health for couples and their children (Steel et al., 2016). Naturopaths have particular expertise in this area, which may explain why women planning a pregnancy are 1.8 times more likely to consult with a naturopath than women not planning a pregnancy (Hammarberg & Taylor, 2019). With this in mind, the ANC argues that periconceptional counselling and support warrants explicit mention in the Aims and careful attention during the implementation of the strategy.

2) Australians live as long as possible in good health

The ANC is in strong agreement with this aim. Over 80% of the patients visiting a naturopath in Australia report having a chronic illness (Suzuki, 2018). Australians who visit a naturopath do so because they experience their naturopath as helpful and supportive, and find that naturopathic care gives them a sense of control over their health. Clinical research also suggests naturopathic care can provide positive health benefits to individuals with a range of chronic health conditions including national health priority areas such as diabetes, cardiovascular disease, and mental illness (Steel et al., 2017). Internationally, the vast majority of naturopaths actively engage in health promotion activities (Foley et al., 2020a). Furthermore, the Australian naturopathic profession commonly discusses important preventive health topics with their patients, such as diet and nutrition, sleep, stress management, physical activity and fitness. As such, the ANC is deeply committed to seeing this aim fulfilled across the life course.

3) Health equity for target populations

The ANC fully supports health equity for the proposed target populations. Vulnerable populations such as Aboriginal and Torres Strait Islander people, migrant and refugee populations, those experiencing homelessness, disability, ageing and low socioeconomic status, and those living in rural and remote communities have been identified as areas of concern (Smith et al., 2021). However, a number of these groups potentially do not fit into the focus areas outlined. With reference to personal and cultural choices, it should be noted that the World Health Organisation (WHO) recognises that traditional and complementary medicine (T&CM) is an important yet underestimated part of healthcare and endorses the harnessing and potential contribution it has to health, wellness and people centred health care (World Health Organization, 2013). Naturopathy is a distinct system of T&CM with a patient-centred preventative emphasis which is recognised by the WHO (Bradley et al., 2019) and aligns with the Strategy's aim to reduce cultural and other inequities.

4) Investment in prevention is increased

ANC endorses the increased focus on expenditure in prevention with the aim to balance out and potentially reduce the need for treatment of illness and disease.

References

- Bradley, R., Harnett, J., Cooley, K., McIntyre, E., Goldenberg, J., & Adams, J. (2019). Naturopathy as a model of prevention-oriented, patient-centered primary care: A disruptive innovation in health care. *Medicina (Kaunas, Lithuania)*, 55(9). <https://doi.org/10.3390/medicina55090603>
- Foley, H., Steel, A., & Adams, J. (2020). Consultation with complementary medicine practitioners by individuals with chronic conditions: Characteristics and reasons for consultation in Australian clinical settings. *Health & Social Care in the Community*, hsc.13072. <https://doi.org/10.1111/hsc.13072>
- Hammarberg, K., & Taylor, L. (2019). Survey of maternal, child and family health nurses' attitudes and practice relating to preconception health promotion. *Australian Journal of Primary Health*, 25(1), 43–48. <https://doi.org/10.1071/PY18078>
- Smith, J. A., Wells, L., Gelbart, L., & Lawson, T. (2021). Beyond COVID-19: Consumers call for greater focus on health equity. *Health Promotion Journal of Australia: Official Journal of Australian Association of Health Promotion Professionals*, 32(1), 3–5. <https://doi.org/10.1002/hpja.450>
- Suzuki, K. (2018). The developing world of DOHaD. *Journal of Developmental Origins of Health and Disease*, 9(3), 266–269. <https://doi.org/10.1017/S2040174417000691>
- Steel, A., Adams, J., & Sibbritt, D. (2017). The characteristics of women who use complementary medicine while attempting to conceive: Results from a nationally representative sample of 13,224 Australian women. *Women's Health Issues*, 27(1), 67–74. <https://doi.org/10.1016/j.whi.2016.09.010>
- Steel, A., Lucke, J., Reid, R., & Adams, J. (2016). A systematic review of women's and health professional's attitudes and experience of preconception care service delivery. *Family Practice*, 33(6), 588–595. <https://doi.org/10.1093/fampra/cmw094>
- Steel, A., Schloss, J., Leach, M., & Adams, J. (2020). The naturopathic profession in Australia: A secondary analysis of the Practitioner Research and Collaboration Initiative (PRACI). *Complementary Therapies in Clinical Practice*, 40, 101220. <https://doi.org/10.1016/j.ctcp.2020.101220>
- World Health Organization (Ed.). (2013). WHO traditional medicine strategy. 2014-2023. World Health Organization.

PRINCIPLES

6 Do you agree with the principles? Please explain your selection. (1000 word limit)

Agree

Principles Text:

The Principles of the Strategy are core to the delivery of comprehensive and effective health care.

Multi-sector collaboration is integral to improve health and wellbeing outcomes by providing integrated solutions. Providing a complete multi-disciplinary health care model which includes the capabilities of the naturopathic practitioner sector is vital, where currently, the full scope and potential of these practitioners is underutilised.

Individuals who consult with a naturopath reported they: knew what to do to take care of their health problem; had techniques they could use when their symptoms got worse; and that their naturopath teaches them ways to relieve symptoms themselves more frequently than they reported for their medical doctor (Foley et al., 2020b). In alignment with 'Empowering and Supporting Australians', consumers also reported a higher score for 'patient activation' - or being empowered to take actions themselves - for their naturopath than for their medical doctor (8). This research is supported by unpublished research conducted by the World Naturopathic Federation which found that, internationally, naturopaths are commonly providing information sheets and handouts to patients in their clinics, sharing health-related information through social and professional networks, and giving information talks to the community (Steel & Lloyd, 2021). Combined, these studies emphasise the active role naturopaths play in community and patient education and empowerment, and the unrecognised contribution they may already make to preventive health.

We strongly encourage the consideration of, and adaptation to, emerging issues and new science. The evidence-base supporting naturopathic care in the prevention and treatment of health conditions is constantly evolving and we urge those responsible for implementing the strategy to remain abreast of this evidence. Similarly, naturopathic practitioners have been characterised as early adopters of new health-related evidence and practices, and as such can be a valuable asset in catalysing the change required to transform the health system from its current illness-focus to place a higher priority on wellness and prevention (Bradley et al., 2019).

References

Bradley, R., Harnett, J., Cooley, K., McIntyre, E., Goldenberg, J., & Adams, J. (2019). Naturopathy as a model of prevention-oriented, patient-centered primary care: A disruptive innovation in health care. *Medicina (Kaunas, Lithuania)*, 55(9). <https://doi.org/10.3390/medicina55090603>

Foley, H., Steel, A., & Adams, J. (2020). Perceptions of person-centred care amongst individuals with chronic conditions who consult complementary medicine practitioners. *Complementary Therapies in Medicine*, 52, 102518. <https://doi.org/10.1016/j.ctim.2020.102518>

Steel, A., & Lloyd, I. (n.d.). Community education and health promotion activities of naturopathic practitioners: Results of an international cross-sectional survey. Not Published, available on request.

ENABLERS

7 Do you agree with the enablers? Please explain your selection. (1000 word limit)

Agree

Enablers Text:

Leadership, governance and funding: The Strategy states, “most effective preventive health efforts in Australia have come from evidence-based approaches that have received sustained investment and commitment by governments, the health sector and the community” and that “should be recognised that investment in the avoidance of illness, is an investment in the avoidance of future treatment costs.” Especially relevant to these points is the Natural Therapies Review 2019 which has highlighted the gap in understanding and lack of support for the role of evidence-based complementary medicine in preventive health. While the Review has not been finalised, ANC believes that further appraisal of an increased investment in research into complementary medicine would represent an affordable, feasible and cost-effective prevention action; contributing to aims of this Strategy and benefiting the health of all Australians.

With over 2000 peer reviewed journal articles produced globally, one third of all naturopathic research has been produced by Australian naturopathic researchers (Steel et al., 2021). As such, it is appropriate for the Australian Government to provide support for naturopathic-specific research funding to investigate the implementation of naturopathic services throughout Australia, to achieve systemic change and better health outcomes for all Australians. It is imperative that expert and independent evaluation of prevention programs, are transparent and open to scrutiny to ensure that health preventive interventions remain adaptive to changing circumstances.

Prevention in the health system: We particularly applaud the goal “Prevention will be embedded in the health system” which includes reference to make the most of every opportunity to support prevention in our primary, community and acute care settings. Harnessing the vast skill set of naturopaths as part of this strategy should be part of this focus and investment in illness prevention.

While naturopaths are already embedded in the health system and accessed by the community for acute and chronic health complaints, their full value for health prevention can not be realised without being incorporated into a coordinated plan across all health services.

Partnerships and community engagement: Under this Enabler, ANC falls into the professional association sector who are acknowledged as an integral role in improving the health of Australians. We would like to emphasise the importance of health system action to reorient existing health services to include prevention in routine health service delivery. Ideally, naturopathic practitioners should be part of an integrated healthcare team to ensure better outcomes and experiences for the patient. Naturopaths are a source of knowledge and information that can support and inform policy, strategy and service delivery that meets the needs of a wider sector of the community. As stated previously, many Australians consult with naturopaths as a source of primary health care and as such the health system action should also consider the contribution of naturopaths to optimise preventive health service delivery.

Information and health literacy: As previously stated, naturopaths are committed to supporting consumers and patients to access reliable and credible sources of health information, as well as providing information in an accessible and easy to understand format to the community in general.

In addition to the naturopath-led activities mentioned earlier, the national and global naturopathic profession is also actively involved in community education, as evidenced by this information video recently commissioned by the World Naturopathic Federation which showcased simple lifestyle, and dietary advice for disease prevention: <https://youtu.be/10gKAfpWF2g>

Research and evaluation: The critical engagement of the expertise of consumers, communities, and health care professionals, including naturopathic practitioners, will provide valuable insight into generating the most valuable research for informing the health of Australians. Many naturopaths are active within research and evaluation, and often specialise in chronic diseases such as cardiometabolic diseases, mental health, and obesity (Steel et al., 2021). Once again, it is appropriate for the Australian Government to provide support for naturopathic-specific research funding to investigate the implementation of naturopathic services throughout Australia.

Monitoring and surveillance: This Enabler recognises that a comprehensive prevention monitoring and surveillance system will include information about wider, systemic factors that underpin health and wellbeing. Self-reporting has the potential for inaccurate data collection and may not reveal the gap and limiting factors affect health and wellbeing. We agree that as prevention needs to address the possible social determinants or root causes of ill health to improve health outcomes, monitoring and surveillance indicators must include measures which relate to action on these determinants as well as disease outcomes.

Preparedness: In line with strategic objectives outlined in the Strategy, naturopaths prioritise dietary and lifestyle choices to assist in disease prevention (Steel, Schloss, et al., 2020), whilst promoting mental and physical wellness to enable the community to live a healthy and productive life across their whole lifetime (Steel, Foley, et al., 2020; Steel & Lloyd, 2021), and to be able to pivot in the face of new threats. Naturopathic practitioners are well placed to assist individuals and communities in building resilience and managing stress and anxiety. These services are not only an important aspect of preparedness in the face of any crisis but are also vital to recovery in the aftermath of a crisis.

In the context of the COVID-19 pandemic, the recent release of the World Naturopathic Federation Rapid Reviews on commonly recognised herbal and nutritional support specific for upper respiratory tract infections (Steel, Wardle, et al., 2020) demonstrates the value that the naturopathic academic and clinical community can offer – through relevant, timely, accurate and expert knowledge – to help inform current and future health challenges facing the Australian community.

References

- Steel, A., Foley, H., Bradley, R., Van De Venter, C., Lloyd, I., Schloss, J., Wardle, J., & Reid, R. (2020). Overview of international naturopathic practice and patient characteristics: Results from a cross-sectional study in 14 countries. *BMC Complementary Medicine and Therapies*, 20(1), 59. <https://doi.org/10.1186/s12906-020-2851-7>
- Steel, A., Foley, H., D'Souza, J., Adams, J., & Wardle, J. (2021). Knowledge dissemination by the naturopathic profession: A bibliometric analysis of naturopath-authored, peer-reviewed publications. *Journal of Alternative and Complementary Medicine (New York, N.Y.)*. <https://doi.org/10.1089/acm.2020.0171>
- Steel, A., & Lloyd, I. (2021). Community education and health promotion activities of naturopathic practitioners: Results of an international cross-sectional survey. *BMC Complementary Medicine and Therapies*, In Press(Text available on request).
- Steel, A., Wardle, J., & Lloyd, I. (2020). The potential contribution of traditional, complementary and integrative treatments in acute viral respiratory tract infections: Rapid reviews in response to the COVID-19 pandemic. *Advances in Integrative Medicine*, 7(4), 181–182. <https://doi.org/10.1016/j.aimed.2020.09.001>
- Steel, A., Schloss, J., Leach, M., & Adams, J. (2020). The naturopathic profession in Australia: A secondary analysis of the Practitioner Research and Collaboration Initiative (PRACI). *Complementary Therapies in Clinical Practice*, 40, 101220. <https://doi.org/10.1016/j.ctcp.2020.101220>
- Steel, A., Wardle, J., & Lloyd, I. (2020). The potential contribution of traditional, complementary and integrative treatments in acute viral respiratory tract infections: Rapid reviews in response to the COVID-19 pandemic. *Advances in Integrative Medicine*, 7(4), 181–182. <https://doi.org/10.1016/j.aimed.2020.09.001>

8 Do you agree with the policy achievements for the enablers? (1000 word limit)

Agree

Enablers - Policy Achievements Text:

Leadership, governance and funding

The ANC supports the described national, independent governance mechanism.

Prevention in the health system

The ANC believes in utilising the inherent preventative health capabilities of naturopaths throughout Australia. Further support of these practitioners as they are integrated within health services along-side GPs, pharmacists, nurses and allied health providers, is warranted.

Partnerships and community engagement

Including the ANC in stakeholder decision making processes to drive evidence-based change is welcomed. This will enhance the ways in which naturopaths can be integrated within health services.

Information and health literacy

The dissemination of evidence-based health information via a national platform is welcomed by the ANC. Utilising the expertise of naturopaths with regard to dietary information and the use of complementary medicines, such as vitamin and mineral supplements, will further strengthen the policy.

Research and evaluation

Engaging with Australian naturopathic researchers and practitioners in collaborative partnership research models is recommended by the ANC.

Monitoring and surveillance

The ANC welcomes the preventive health governance mechanism, supporting the monitoring and surveillance of this Strategy.

Preparedness

The ANC supports these policy achievements.

FOCUS AREAS

9 Do you agree with the seven focus areas? Please explain your selection. (1000 word limit)

Agree

Focus Areas Text:

One of the key aspects of naturopathic training and practice involves advising patients on healthy diet and lifestyle changes, therefore the ANC believes the focus areas 2, 3, 6 and 7 are key areas that naturopaths currently support patients by promoting holistic, practical, and preventative approaches to health care. This

encompasses (though not limited to), healthy eating as well as physical activity. We believe these are the foundations of any preventive health strategy. Especially physical activity - which is shown to lower the risk of many cancers, as well as the use of alcohol, drugs, and tobacco (Pearson et al., 2007). In line with seven focus areas, naturopaths prioritise dietary and lifestyle choices to assist in disease prevention (Steel, Schloss, et al., 2020) whilst promoting mental and physical wellness to enable the community to live a healthy and productive life across their whole lifetime (Steel, Foley, et al., 2020; Steel & Lloyd, 2021).

The focus on improving healthy diet and increasing physical exercise could be targeted across different life stages: for a pregnant woman, the critical years in utero; early childhood; school age children; adolescence (which is an at-risk life stage in regard to hazardous behaviours); healthy workplaces; hospitals; and aged care environments. Healthy diet promotion and education are key aspects to support patients with chronic conditions including national priority areas such as obesity, type 2 diabetes, and cardiovascular disease (Foley et al., 2020a; Steel et al., 2017). This would play a significant role in preventing disease across all stages of life (Baird et al., 2017).

Supporting those with mental health conditions with the use of counselling is another key component of naturopathic consultations, as is the prescription of nutrition and herbal medicines for conditions such as stress, anxiety, and depression. Naturopaths often support patients with alcohol and drug addictions with lifestyle advice as well as nutritional and herbal medicines. This may even prevent those patients from abusing alcohol and drugs for non-medical reason (Steel et al., 2017).

References

- Baird, J., Jacob, C., Barker, M., Fall, C. H. D., Hanson, M., Harvey, N. C., Inskip, H. M., Kumaran, K., & Cooper, C. (2017). Developmental Origins of Health and Disease: A Lifecourse Approach to the Prevention of Non-Communicable Diseases. *Healthcare (Basel, Switzerland)*, 5(1). <https://doi.org/10.3390/healthcare5010014>
- Foley, H., Steel, A., & Adams, J. (2020). Consultation with complementary medicine practitioners by individuals with chronic conditions: Characteristics and reasons for consultation in Australian clinical settings. *Health & Social Care in the Community*, hsc.13072. <https://doi.org/10.1111/hsc.13072>
- Pearson, R., Turner, L. W., Young, M. E., & Knickerbocker, C. (2007). Correlates of healthy eating and physical activity among students in grades 6-12. *American Journal of Health Studies*, 22(3), 170–178. Health & Medical Collection.
- Steel, A., Adams, J., & Sibbritt, D. (2017). The characteristics of women who use complementary medicine while attempting to conceive: Results from a nationally representative sample of 13,224 Australian women. *Women's Health Issues*, 27(1), 67–74. <https://doi.org/10.1016/j.whi.2016.09.010>
- Steel, A., Foley, H., Bradley, R., Van De Venter, C., Lloyd, I., Schloss, J., Wardle, J., & Reid, R. (2020). Overview of international naturopathic practice and patient characteristics: Results from a cross-sectional study in 14 countries. *BMC Complementary Medicine and Therapies*, 20(1), 59. <https://doi.org/10.1186/s12906-020-2851-7>
- Steel, A., & Lloyd, I. (2021). Community education and health promotion activities of naturopathic practitioners: Results of an international cross-sectional survey. *BMC Complementary Medicine and Therapies*, In Press(Text available on request).

Steel, A., Schloss, J., Leach, M., & Adams, J. (2020). The naturopathic profession in Australia: A secondary analysis of the Practitioner Research and Collaboration Initiative (PRACI). *Complementary Therapies in Clinical Practice*, 40, 101220. <https://doi.org/10.1016/j.ctcp.2020.101220>

10 Do you agree with the targets for the focus areas? (1000 word limit)

Agree

Focus Areas - Targets Text:

The ANC agrees with the focus area targets and welcomes the new emphasis on preventative health as opposed to an illness-focused health system.

11 Do you agree with the policy achievements for the focus areas? (1000 word limit)

Agree

Focus Areas - Policy Achievements Text:

Harnessing the skills of naturopaths and incorporating these practitioners into coordinated plans across all health services will further enhance the described policy achievements for the focus areas. Approximately 6.2% of Australians have consulted with a naturopath in the previous 12 months 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 (Wardle et al., 2019). The ways in which naturopaths can enhance specific policy outcomes are outlined below:

Policy achievements for Focus Area 2: Improving access to, and promoting the consumption of, a healthy diet -

Naturopaths provide sound dietary recommendations to patients during consultations. Healthy diet promotion and education are key aspects to support patients with chronic conditions including national priority areas such as obesity, type 2 diabetes and cardiovascular disease (Foley et al., 2020a; Steel et al., 2017).

Policy achievements for Focus Area 3: Increasing physical activity -

Naturopaths readily encourage patients to partake in physical activity, to improve their physical and mental wellbeing. Education on the ways in which exercise decreases the risk of certain chronic diseases is a further aspect of many naturopathic consultations. At times, naturopaths may refer patients to allied health providers such as physiotherapists and exercise physiologists for specific guidance with exercise.

Policy achievements for Focus Area 6: Reducing alcohol and other drug harm -

Naturopaths support patients experiencing alcohol and drug addiction and can assist with recovery of substance abuse using lifestyle advice as well as nutritional

and herbal medicines. Moreover, naturopaths support the mental health of patients, which may prevent them from abusing alcohol and drugs for non-medical reasons (Steel et al., 2017).

Policy achievements for Focus Area 7: Protecting mental health -

In conjunction with supporting physical health, naturopathic treatment also supports mental health of the patient. Counselling is a component of naturopathic consultations, as is the prescription of nutritional and herbal medicines for conditions such as stress, anxiety and depression (Steel et al., 2017).

References

Foley, H., Steel, A., & Adams, J. (2020). Consultation with complementary medicine practitioners by individuals with chronic conditions: Characteristics and reasons for consultation in Australian clinical settings. *Health & Social Care in the Community*, hsc.13072. <https://doi.org/10.1111/hsc.13072>

Steel, A., Adams, J., & Sibbritt, D. (2017). The characteristics of women who use complementary medicine while attempting to conceive: Results from a nationally representative sample of 13,224 Australian women. *Women's Health Issues*, 27(1), 67–74. <https://doi.org/10.1016/j.whi.2016.09.010>

Wardle, J., Steel, A., & Casteleijn, D. (2019). An evidence based overview of naturopathic practice in Australia. *Australian Journal of Herbal and Naturopathic Medicine*, 31(1), 9–13. <https://doi.org/10.33235/ajhnm.31.1.9-13>

CONTINUING STRONG FOUNDATIONS

12 Do you agree with this section of the Strategy? Please explain your selection. (1000 word limit)

Agree

Continuing Strong Foundations Text:

The ANC acknowledges and supports the foundations of prevention-based strategies by government, non-government organisations and communities. As a professional association, the ANC looks forward to playing role in better preventing illness and disease throughout Australia.

FEEDBACK

13 Please provide any additional comments you have on the draft Strategy. (No word limit)

Comments Text: