



SUBMISSION BY

THE AUSTRALIAN NATURAL THERAPISTS ASSOCIATION LTD (ANTA)

PO BOX 657

MAROOCHYDORE QLD 4558

ACN: 000 161 142 ABN: 68 000 161 142

To

ADVERTISING CONSULTATION  
RECALLS AND ADVERTISING SECTION  
OFFICE OF PRODUCT REVIEW  
THERAPEUTIC GOODS ADMINISTRATION  
PO BOX 100  
WODEN ACT 2606

Regarding

Consultation Regulation Impact Statement  
Regulating the advertising of therapeutic goods to the  
general public Version 4.6, May 2013

19<sup>th</sup> July 2013



The Australian Natural Therapists Association Ltd (ANTA) thanks the Therapeutic Goods Administration (TGA) for the opportunity to provide comment on the Consultation Regulation Impact Statement: Regulating the advertising of therapeutic goods to the general public.

ANTA is a national professional association representing the interests of natural therapy practitioners including Naturopaths, Herbalists, Nutritionists and Homoeopaths.

For the information of the TGA a profile of ANTA is included at the end of this submission.

ANTA has two prime concerns with the Consultation RIS which are detailed below:

**Proposal 6: Advertising directed to health professionals**

Two options have been proposed to ensure that only appropriately qualified health professionals are exempted from the advertising requirements:

**Option 1:** Status quo – maintain the current system

**Option 2:** Update the exemption for health professionals in section 42AA of the Act To only recognise health practitioners regulated under the *Health Practitioner Regulation National Law*.

The Consultation RIS document outlines the disadvantages of retaining the current system (option 1) and perpetuate the problems as follows:

*The TGA would not be assured that the non-NRAS registered health practitioners are able to exercise specialist judgement when either treating patients with advertised therapeutic goods, or advising them about the use of advertised therapeutic goods*

ANTA disagrees with this statement and believes there is a very strong case for retaining the current system (option 1). The above statement appears to show a lack of knowledge and understanding by the TGA of the extensive high quality training that Naturopaths, Herbalists (Western), Nutritionists and Homoeopaths complete.

Under the current system, health professions to whom advertising may currently be directed exclusively without invoking part 5-1 of the *Therapeutic Goods Act 1989 (Section 42AA)*, includes Naturopaths, Herbalists, Homoeopaths and Nutritionists who are currently not registered under the NRAS.



As part of the case for retaining the current system for advertising directed to health professionals, ANTA submits the following definitions and information as outlined in the Government National Health Training Package:

### **Naturopaths:**

A naturopath is a practitioner whose practice and modalities have been defined by the Government National Health Training Package HLT60512 (current version) introduced in 2002 and Bachelor Degree programs delivered by universities and colleges.

A naturopath is a practitioner having core training in naturopathic principles and philosophy and in at least three or four practice modalities including, but not limited to, herbal medicine (western), nutritional medicine, homoeopathy and remedial massage.

Naturopathy is a distinct multi-dimensional system of primary care and practice that focuses on diagnosis, treatment and prevention of illness. Naturopathy is distinguished by principles based upon the objective observation of the nature of health and disease and is continually re-examined in the light of scientific advances. Naturopathy is a multi-disciplinary approach that recognises the body's innate power to heal itself and includes modern, traditional, scientific and empirical methods.

Qualifications awarded to naturopaths are delivered under the Australian Qualifications Framework and are delivered nationally by Registered Training Organisations and Universities. The courses delivered by Registered Training Organisations and Universities are 3 and 4 year full time courses and are subject to regulation under the government funded Australian Skills Quality Authority (ASQA) and Tertiary Education Quality Standards Authority (TEQSA).

Clinical efficacy and safety is developed through the delivery of the Health Training Package curriculum for naturopathy including the underpinning knowledge that is developed in the classroom and the clinical skills developed in the supervised clinical practicum, through clinical observations and clinical practice in the field. The knowledge and skills are delivered across the course structure. An example of the naturopathy course units containing this information are listed below:

### **Naturopathy Course Units HLT60512:**

BSBFLM303C	Contribute to effective workplace relationships
CHCORG428A	Reflect on and improve own professional practice
HLTHOM612D	Work within a homoeopathic framework
HLTNAT604C	Provide acute homoeopathic treatment
HLTNAT609D	Work within a naturopathic framework



HLTNUT601C	Apply literature research findings to clinical practice
HLTNAT607D	Manage work within a naturopathic framework
HLTCOM502C	Develop professional expertise
HLTNAT603D	Provide naturopathic nutritional treatment
HLTHER608C	Provide specialised western herbal medicine treatment
HLTCOM404C	Communicate effectively with clients
HLTNAT608C	Apply naturopathic diagnostic framework
HLTAP501C	Analyse health information
HLTNUT602C	Provide specialised nutritional care
HLTNAT605C	Plan naturopathic treatment strategy
HLTNAT606C	Perform naturopathic health assessment
HLTAP401B	Confirm physical health status
HLTHIR501C	Maintain an effective health work environment
HLTCOM503D	Manage a practice
HLTIN301C	Comply with infection control policies and procedures

Further details and additional information regarding the Government Accredited Naturopathy Course HLT60512 is available at [www.training.gov.au](http://www.training.gov.au)

The above government accredited course units clearly demonstrate that naturopaths are competent practitioners who are able to exercise specialist judgement when either treating patients with advertised therapeutic goods, or advising patients about the use of advertised goods.

The above course units also clearly demonstrate naturopaths are appropriately qualified and are fully trained competent professionals and should be exempted from the advertising requirements.

The TGA can be assured the government accredited training naturopaths receive under the Australian Qualifications Framework exceeds requirements to be able to exercise specialist judgement when either treating patients with advertised therapeutic goods or advising them about the use of advertised therapeutic goods.

To consider regulating skilled and well trained naturopaths in the same way as advertising to the public is illogical and nonsensical and will restrict the tools of trade that naturopaths require to effectively carry out their practice in accordance with their training.

Practitioners invest significant amounts of time, effort and finances to obtain the skills and competencies outlined in the above Health Training package and it is inconceivable and unjust for the TGA to consider regulating professional naturopaths trained under government and university training programs the same way as advertising to the general public as outlined in option 2.



Option 2 outlined in Proposal 6 is completely at odds with the Government National Health Training Package.

ANTA strongly recommends the TGA should continue to regulate naturopaths under the current system (option 1).

### **Herbalists (Western):**

A herbalist or western herbalist whose practice is defined by the Government National Health Training Package HLT60112 (current version) and higher education Bachelor Degree programs delivered by universities and colleges. A herbalist or western herbalist engages in the compounding of unaltered natural herbs for therapeutic purposes for individuals under their care. Herbal medicines include herbs, herbal materials, herbal preparations and finished herbal products that contain as active ingredients parts of plants or other plant materials or combinations.

Qualifications awarded to herbalists are delivered under the Australian Qualifications Framework and are delivered nationally by Registered Training Organisations and Universities. The courses delivered by Registered Training Organisations and Universities are 3 and 4 year full time courses and are subject to regulation under the government funded Australian Skills Quality Authority (ASQA) and Tertiary Education Quality Standards Authority (TEQSA).

Clinical efficacy and safety is developed through the delivery of the Health Training Package curriculum for herbal medicine including the underpinning knowledge that is developed in the classroom and the clinical skills developed in the supervised clinical practicum, through clinical observations and clinical practice in the field. The knowledge and skills are delivered across the course structure. An example of the herbal medicine course units containing this information are listed below:

### **Herbal Medicine (Western) Course Units HLT60112:**

BSBFLM303C	Contribute to effective workplace relationships
CHCORG428A	Reflect and improve own professional practice
HLTHER604C	Perform western herbal medicine health assessment
HLTCOM502C	Develop professional expertise
HLTHER606D	Prepare and dispense western herbal medicine
HLTHER608C	Provide specialised western herbal medicine treatment
HLTCOM404C	Communicate effectively with clients
HLTHER609D	Provide western herbal medicine treatment
HLTIN504D	Manage the control of infection



HLTHIR501C	Maintain an effective work environment
HLTAP401B	Confirm physical health status
HLTNUT601C	Apply literature research findings to clinical practice
HLTCOM503D	Manage a practice
HLTAP501C	Analyse health information
HLTHER603D	Operate a western herbal medicine dispensary
HLTHER601C	Apply western herbal medicine diagnostic framework
HLTHER605C	Plan the western herbal medicine treatment strategy
HLTIN301C	Comply with infection control policies and procedures
HLTHER607C	Provide dietary advice

Further details and additional information regarding the Government Accredited Herbal Medicine Course HLT60112 is available at [www.training.gov.au](http://www.training.gov.au)

The above government accredited course units clearly demonstrate that herbalists (western) are competent practitioners who are able to exercise specialist judgement when either treating patients with advertised therapeutic goods, or advising patients about the use of advertised goods.

The above course units also clearly demonstrate herbalists (western) are appropriately qualified and are fully trained competent professionals and should be exempted from the advertising requirements.

The TGA can be assured the training herbalists (western) receive exceeds requirements to be able to exercise specialist judgement when either treating patients with advertised therapeutic goods or advising them about the use of advertised therapeutic goods.

To consider regulating skilled and well trained herbalists in the same way as advertising to the public is illogical and nonsensical and will restrict the tools of trade that herbalists require to effectively carry out their practice in accordance with their training.

Practitioners invest significant amounts of time, effort and finances to obtain the skills and competencies outlined in the above Health Training package and it is inconceivable and unjust for the TGA to consider regulating professional herbalists trained under government and university training programs the same way as advertising to the general public as outlined in option 2.

ANTA strongly recommends the TGA should continue to regulate herbalists (western) under the current system (option 1).



## **Nutritionists (Nutritional Medicine):**

Nutritional Medicine or a nutritionist is a practitioner whose practice has been defined by the Government National Health Training Package HLT61012 (current version) and higher education Bachelor Degree programs delivered by universities and colleges.

Nutritionists focus on disorders attributable to nutritional deficiency, food intolerance and toxic overload. They address disease processes such as chronic digestive problems and allergies through the use of individually tailored diets and supplementation to address presenting ailments.

Qualifications awarded to nutritionists are delivered under the Australian Qualifications Framework and are delivered nationally by Registered Training Organisations and Universities. The courses delivered by Registered Training Organisations and Universities are 3 and 4 year full time courses and are subject to regulation under the government funded Australian Skills Quality Authority (ASQA) and Tertiary Education Quality Standards Authority (TEQSA).

Clinical efficacy and safety is developed through the delivery of the Health Training Package curriculum for nutritional medicine including the underpinning knowledge that is developed in the classroom and the clinical skills developed in the supervised clinical practicum, through clinical observations and clinical practice in the field. The knowledge and skills are delivered across the course structure. An example of the nutritional medicine course units containing this information are listed below:

### **Nutritional Medicine Course Units HLT61012:**

BSBFLM303C	Contribute to effective workplace relationships
CHCORG428A	Reflect on and improve own professional practice
HLTCOM502C	Develop professional expertise
HLTCOM404C	Communicate effectively with clients
HLTIN504D	Manage the control of infection
HLTHIR501C	Maintain an effective health work environment
HLTAP401B	Confirm physical health status
HLTNUT601C	Apply literature research findings to clinical practice
HLTCOM503D	Manage a practice
HLTNUT606B	Plan the nutritional treatment strategy
HLTNUT603B	Apply a nutritional medicine diagnostic framework
HLTNUT609C	Prepare and dispense nutritional and dietary supplements
HLTAP501C	Analyse health information
HLTNUT605B	Perform nutritional medicine health assessment



HLTNUT610B	Provide basic dietary advice
HLTNUT604C	Manage work within a clinical nutritional framework
HLTNUT607C	Provide nutritional medicine treatment
HLTNUT608B	Provide specialised nutritional medicine treatment
HLTCOM406C	Make referrals to other health care professionals when appropriate

Further details and additional information regarding the Government Accredited Nutritional Medicine Course HLT61012 is available at [www.training.gov.au](http://www.training.gov.au)

The above government accredited course units clearly demonstrate that nutritionists are competent practitioners who are able to exercise specialist judgement when either treating patients with advertised therapeutic goods, or advising patients about the use of advertised goods.

The above course units also clearly demonstrate nutritionists are appropriately qualified and are fully trained competent professionals and should be exempted from the advertising requirements.

The TGA can be assured the training nutritionists receive exceeds requirements to be able to exercise specialist judgement when either treating patients with advertised therapeutic goods or advising them about the use of advertised therapeutic goods.

To consider regulating skilled and well trained nutritionists in the same way as advertising to the public is illogical and nonsensical and will restrict the tools of trade that nutritionists require to effectively carry out their practice in accordance with their training.

Practitioners invest significant amounts of time, effort and finances to obtain the skills and competencies outlined in the above Health Training package and it is inconceivable and unjust for the TGA to consider regulating professional nutritionists trained under government and university training programs the same way as advertising to the general public as outlined in option 2.

Option 2 outlined in Proposal 6 is completely at odds with the Government National Health Training Package.

ANTA strongly recommends the TGA should continue to regulate nutritionists under the current system (option 1).

### Homoeopath:





A Homoeopath is a practitioner whose practice has been defined by the Government National Health Training Package HLT60612 (current version) and higher education Bachelor Degree programs. A Homoeopath is a practitioner who has trained in homeopathic principles, philosophy and practice and uses a system of treating patients with very low dose treatment preparations according to the principle 'like should be cured by like'. Homoeopathy is also a therapeutic method of preparation of substances whose effects when administered to healthy subjects, corresponds to the manifestations of the disorder (symptoms, clinical signs and pathological states) in the unwell.

Qualifications awarded to homoeopaths are delivered under the Australian Qualifications Framework and are delivered nationally by Registered Training Organisations and Universities. The courses delivered by Registered Training Organisations and Universities are 3 and 4 year full time courses and are subject to regulation under the government funded Australian Skills Quality Authority (ASQA) and Tertiary Education Quality Standards Authority (TEQSA).

Clinical efficacy and safety is developed through the delivery of the Health Training Package curriculum for homoeopathy including the underpinning knowledge that is developed in the classroom and the clinical skills developed in the supervised clinical practicum, through clinical observations and clinical practice in the field. The knowledge and skills are delivered across the course structure. An example of the homoeopathy course units containing this information are listed below:

#### **Homoeopathy Course Units HLT60612:**

BSBFLM303C	Contribute to effective workplace relationships
CHCORG428A	Reflect on and improve own professional practice
HLTCOM503D	Manage a practice
HLTCOM502C	Develop professional expertise
HLTIN301C	Comply with infection control policies and procedures
HLTCOM406C	Make referrals to other health care professionals when appropriate
HLTCOM404C	Communicate effectively with clients
HLTIN504D	Manage the control of infection
HLTHIR501C	Maintain an effective health work environment
HLTAP401B	Confirm physical health status
HLTCOM503D	Manage a practice
HLTAP501C	Analyse health information
HLTHOM606D	Prepare and dispense homoeopathic medicine
HLTHOM602C	Conduct basic homoeopathic research
HLTHOM603D	Manage work within a homoeopathic framework
HLTHOM610C	Take homoeopathic case
HLTHOM604C	Perform clinical screening examination and assessment



HLTHOM608C	Provide homoeopathic treatment and manage the case
HLTHOM609D	Provide specific homoeopathic assessment and care
HLTHOM601C	Apply homoeopathic diagnostic framework
HLTHOM605C	Plan homoeopathic treatment strategy

Further details and additional information regarding the Government Accredited Homoeopathy Course HLT61012 is available at [www.training.gov.au](http://www.training.gov.au)

The above government accredited course units clearly demonstrate that homoeopaths are competent practitioners who are able to exercise specialist judgement when either treating patients with advertised therapeutic goods, or advising patients about the use of advertised goods.

The above course units also clearly demonstrate homoeopaths are appropriately qualified and are fully trained competent professionals and should be exempted from the advertising requirements.

The TGA can be assured the training homoeopaths receive exceeds requirements to be able to exercise specialist judgement when either treating patients with advertised therapeutic goods or advising them about the use of advertised therapeutic goods.

To consider regulating skilled and well trained homoeopaths in the same way as advertising to the public will restrict the tools of trade that homoeopaths require to effectively carry out their practice in accordance with their training.

Practitioners invest significant amounts of time, effort and finances to obtain the skills and competencies outlined in the above Health Training package and it is inconceivable and unjust for the TGA to consider regulating professional nutritionists trained under government and university training programs the same way as advertising to the general public as outlined in option 2.

Option 2 outlined in Proposal 6 is completely at odds with the Government National Health Training Package.

ANTA strongly recommends the TGA should continue to regulate homoeopaths under the current system (option 1).

### **ANTA Membership and Accreditation:**

The minimum qualification available since the introduction of Health Training Packages in 2001 for Naturopaths, Herbalists (Western), Nutritionists and Homoeopaths in



accordance with the Australian Qualifications Framework is Advanced Diploma which are delivered by Government accredited Registered Training Organisations (RTO's).

In addition many RTO's and universities also deliver qualifications for Naturopaths, Herbalists (Western), Nutritionists and Homoeopaths in accordance with the Australian Qualifications Framework at Bachelor Degree level.

Both Advanced Diploma and Bachelor Degree qualifications are recognised by ANTA for membership purposes and accreditation in Naturopathy, Herbal Medicine (Western), Nutrition and Homoeopathy.

ANTA members are governed by the ANTA Constitution and required to abide by the ANTA Code of Professional Ethics, ANTA Policies and Rules.

ANTA adopted the Code of Professional Ethics in order to defend public health and safety, protect the public interest and promote informed health care choices.

The ANTA Code of Professional Ethics sets the minimum standard for the aspects of conduct and practice for ANTA accredited practitioners. The standard is set to ensure the conduct and professional practice of ANTA accredited practitioners is socially responsible and that it promotes the appropriate, judicious, effective and safe practice of Natural Therapies and does not mislead or deceive.

ANTA requires high level qualifications for membership and accreditation and members are required to abide by a stringent Code of Professional Ethics.

As a consequence of the above, the TGA can be assured that ANTA members who are not NRAS registered practitioners are able to exercise specialist judgement when either treating patients with advertised therapeutic goods, or advising them about the use of advertised therapeutic goods.

The Australian Natural Therapists Association Ltd (ANTA) is a Schedule 1 organisation in accordance with the *Therapeutic Goods Act 1989* ("the Act"). Persons can become members of ANTA if they have the qualifications and training in accordance with ANTA's requirements.

ANTA notes the Act does not regulate health care practice issues, nor does it inhibit related operations. However, it offers the advantages for consumers and health care professionals to have confidence in the standard of ready-made proprietary therapeutic goods which they use or prescribe.



ANTA also notes there is no requirement in the Act that complementary health care professionals be registered and the Act does not recognise the status of any healthcare professionals.

The current system of recognising natural therapists (complementary healthcare professionals) and advertising exemptions in the Act came into existence after concerns were raised in the Senate that natural therapists would be penalised and it would have a detrimental effect on the natural therapy profession. After extensive negotiations with the natural therapy profession the TGA developed the current system of recognising the professional status of natural therapists to ensure natural therapists were not disadvantaged. Since introduction of the Act in 1989 the system for recognising qualified and trained natural therapists has worked well.

Since 1989 there have been significant advances made in the quality of training and this has served to strengthen and improve the healthcare services natural therapists provide to the public.

Very few complaints are made against natural therapists by the public and this is clearly demonstrated in the following data published by the Health Care Complaints Commission NSW.

#### Natural Therapy Complaints received by HCCC (NSW)

Practitioner	Year	2008	2009	2010	2011	2012
Naturopaths		2	2	3	1	1
Herbalists		–	–	–	2	–
Homoeopaths		–	2	1	–	–
Nutritionists		–	–	–	–	–

From the above data it is clear that Naturopaths, Herbalists, Nutritionists and homoeopaths are well trained and able to exercise specialist judgement when either treating patients with advertised therapeutic goods, or advising them about the use of therapeutic goods.

The attempt to amend the Act to regulate natural therapists in the same way as the public is seen by the natural therapy profession as a breach of faith by the TGA in relation to agreement reached with the TGA by the natural therapy profession prior to the Act being enacted by parliament.

ANTA opposes the proposed amendments to the Act which will disadvantage natural therapists.



## **Continuing Professional Education:**

Sponsors, manufacturers, professional associations and various other organisations provide seminars, conferences, workshops and webinars to provide naturopaths, herbalists, nutritionists and homoeopaths as well as other natural therapists with the latest information on products and research and is a prime opportunity for practitioners to undertake and complete Continuing Professional Education (CPE). CPE is a valuable tool used by natural therapy practitioners to update knowledge and skills and is vital for safe professional practice.

There are enormous benefits to practitioners, the public and public safety as a result of practitioners upgrading skills and techniques through CPE seminars, conferences, workshops and webinars provided by sponsors and professional associations.

Under the changes proposed by the TGA (option2) naturopaths, herbalists, nutritionists and homoeopaths would be regulated the same way as advertising to the public and information provided to practitioners at seminars, conferences and workshops would fall under this regulation.

ANTA has made significant investments to provide natural therapy practitioners with the latest information and resources which include:

- All ANTA members have free access online to EBSCOHOST Research Database – Alternative Medicine Research Package
- All ANTA members have free access online to IMGateway Scientific Resources for natural therapists
- All ANTA members can attend the ANTA National Seminars free of charge

Due to the legal implications and possible breaches under the proposed change to option 2 a likely outcome is that professional associations and manufactures will cease to continue to provide seminars, conferences, workshops, webinars and the latest research vital to the public healthcare.

This would be a completely unnecessary consequence and significant setback for the profession and the healthcare services provided to the public by natural therapists. The ongoing healthcare of the public in terms of advances and research would be seriously undermined if the TGA adopted option 2 an amended the lists of health professionals in section 42AA of the Act.

## **Proposal 5: Advertising of higher risk medical devices**

**Option 1:** Status quo – maintain the current system



**Option 2:** Prohibit the advertising of higher risk medical devices

Under option 2 sponsors would not be allowed to advertise higher risk medical devices to the public.

If the TGA proceeds to change the Act under Proposal 6 to regulate naturopaths, herbalists, nutritionists and homoeopaths the same way as advertising to the public, ANTA has serious concerns that these practitioners will be denied access to vital information regarding devices which comprise their tools of trade.

It has been clearly demonstrated above that naturopaths, herbalists, nutritionists and homoeopaths are skilled and well trained practitioners who are able to exercise specialist judgement when either treating patients with advertised therapeutic goods, or advising them about the use of therapeutic goods.

ANTA has concerns that the statement by the TGA in Proposal 6:

*The TGA would not be assured that the non-NRAS registered health practitioners are able to exercise specialist judgement when either treating patients with advertised therapeutic goods, or advising them about the use of advertised therapeutic goods.*

ANTA has liaised with several government registered training organisations who are very concerned that this statement has been widely publicised on social media and will have a detrimental effect on new student enrolments. The adoption of option 2 by the TGA under Proposal 6 to not exempt practitioners who are highly qualified and not NRAS registered has the potential to significantly affect the business operations of many government registered training organisations. If advertising to practitioners is regulated in the same way as the public, potential students could interpret this as meaning the TGA regards the skills and knowledge of trained and competent practitioners as being no greater or at a higher level than the skills and knowledge of the public who have received no training.

ANTA is opposed to amendments to the Act that restricts the information practitioners receive and any restrictions to tools of trade and recommends the TGA continues to recognise naturopaths, herbalists, nutritionists and homoeopaths and allow them to receive practitioner advertising information regarding all devices used as their tools of trade.

ANTA has for many years supported and lobbied governments for the introduction and inclusion Naturopaths, Herbalists (Western), Nutritionists, Homoeopaths and other Natural Therapists including Remedial Therapists, Myotherapists, Musculoskeletal Therapists, Aromatherapists and Ayurveda Medicine practitioners in national statutory registration schemes including the newly formed NRAS.



ANTA is willing to continue to work and collaborate with the TGA to achieve a positive outcome that may affect or impact on naturopaths, herbalists (western), nutritionists and homoeopaths in relations to any of the changes proposed by the TGA.

ANTA is also willing to work and collaborate with the TGA to achieve statutory registration for naturopaths, herbalists, nutritionists, homoeopaths and other natural therapists under the NRAS.

### ANTA Profile

The Australian Natural Therapists Association Limited (ANTA) is the largest national democratic association of '*recognised professional*' traditional medicine and natural therapy [Complementary Medicine] practitioners who work in the areas of health care and preventive medicine.

ANTA was founded in 1955 and represents the multi-disciplinary interests of over 7000 accredited practitioners Australia-wide. ANTA is one of the original *Schedule 1* bodies as defined in the regulations of the Therapeutic Goods Act 1989.

ANTA was recognised by the Australian Taxation Office, in November 2002, under a private ruling as '*...a professional association that has uniform national registration requirements for practitioners of traditional medicine and natural therapies...*' thereby allowing ANTA practitioners of Acupuncture, Chinese Herbal Medicine, Naturopathy and Western Herbal Medicine to practise GST- free.

ANTA:

- provides an egalitarian representation of all disciplines accredited by the association
- possesses infrastructure, systems, policies and procedures which enables the association to encompass all aspects of the profession
- represents the interests of individual disciplines



- acts as advocate for practitioners of all disciplines accredited by the association
- promotes the health and safety of consumers of traditional medicine and natural therapy health services

The disciplines recognised by ANTA and accredited by the Australian Natural Therapists Accreditation Board (ANTAB) are:

<b>Acupuncture</b>	<b>Aromatherapy</b>
<b>Ayurvedic Medicine</b>	<b>Chinese Herbal Medicine</b>
<b>Chiropractic/Osteopathy</b>	<b>Homoeopathy</b>
<b>Naturopathy</b>	<b>Nutrition</b>
<b>Oriental Remedial Therapy</b>	<b>Remedial Massage Therapy</b>
<b>Traditional Chinese Medicine</b>	<b>Myotherapy</b>
<b>Counselling</b>	<b>Musculoskeletal Therapy</b>
<b>Western Herbal Medicine</b>	<b>Shiatsu</b>

ANTA is committed to continuous quality improvement and providing the Australian public with the highest possible standards for the conduct and safety of traditional medicine and natural therapy practitioners, and addresses standards for conduct and safety through:

- The high standard of entry requirements for potential members
- Yearly review of entry standards to maintain currency and ensure relevance
- Active participation in setting standards at national and state levels via industry reference group and working committee participation
- Free student membership to the Association
- Yearly review of the courses on offer within the profession, and courses currently accredited by ANTAB
- Compulsory yearly proof of minimum continuing professional education requirements of members
- Provision of “free” continuing professional education seminars in all states of Australia
- Provision of online continuing professional education services for members
- Compulsory up-to-date senior first aid certificates
- Compulsory specialised professional indemnity and public liability insurance
- The Association enforces a strict Code of Professional Ethics





- The Association maintains effective public complaints handling and resolutions mechanisms outlined in the Constitution
- The Association maintains a National Administration Office, which is open five days a week and staffed by an Executive Officer and fully trained support staff
- The Association maintains fully computerised membership, accreditation and course recognition databases and systems
- Provision of communication via the Members' page on the ANTA website of the most up to date information related to the profession
- Provision of regular Newsletters and ANTA e-News detailing information of current interest to the profession
- Provision of a Professional Publication 'The Natural Therapist', four times a year offering the latest information available on topics of interest to the profession
- Provision of an ANTA website to allow interested persons and consumers to obtain information about the Association, natural therapies and traditional medicine and the location of accredited practitioners of the Association
- Provision of free access by members to the latest scientific publications and health resources published by EBSCO Host including:
  - 2800+ full text medical journals
  - Access to the worlds' most reputable bibliographic indexes for medicine, allied health and complementary/alternative medicine (CINAHL, MEDLINE & AMED)
  - 700+ evidence based articles for consumer health researchers
  - 300+ full text books & monographs
  - Hundreds of special reports and booklets and much more.
- Provision of free access by members to the latest up to date scientific information and health resources published by IM Gateway including:
  - 300 Herbs
  - 350 Diseases & Conditions
  - 250 Supplements
  - Herb – Drug Interaction Guide
  - Supplement – Drug Interaction Guide
  - Treatment Options
  - Organ & Body Systems
  - Drug Induced Depletions
  - Evidenced Based & Peer Reviewed Information
- Provision of funding grants for research into traditional medicine and natural therapies



- Provision of online resources and latest research for members
- Provision of annual ANTA Student Bursary Awards totalling \$10,000 p.a. to encourage excellence in the study of traditional medicine and natural therapies
- Setting of standards for clinics, hygiene and infection control
- Setting of standards for skin penetration
- Setting of standards for keeping and maintaining patient records
- Making public the requirements for recognition of traditional medicine and natural therapy courses by ANTA for membership purposes
- Making public details of traditional medicine and natural therapy courses recognised by ANTA for membership purposes
- Only recognising government accredited courses that meet ANTA's stringent requirements (note – ANTA does not recognise courses delivered totally by distance education)
- Making public details of ANTA membership criteria and qualifications
- Consultation with Members on matters of importance. The Association uses the Members' web page, consultation meetings, newsletters, ANTA e-News and the magazine to consult with Members
- A '1800' free-call number promoted to consumers and practitioners, facilitating a direct path of communication with the Association's national administration office staff
- A '1800' free-call number and web page promoted to consumers and practitioners, to identify appropriately qualified practitioners in the consumer's geographical area
- Undertaking ongoing internal audits of its policies and processes of operation and all matters to do with professional practice
- External audits of procedures, policies & processes to ensure compliance with the principles of best practice
- Publishing an Annual Report on the activities and performance of the Association
- Undertaking a yearly audit of its Constitution which includes the Association's Complaints, Ethics & Disciplinary Panels
- Undertaking a yearly audit of its Code of Professional Ethics
- Ongoing consultation and collaboration with other professional associations
- Ongoing dialogue and correspondence with ministers, government departments and regulatory bodies
- Ongoing research of policies in overseas professional associations and policies of overseas governments
- Maintaining a Natural Therapy Adverse Events Register
- On line polling of Members and the Public on relevant professional and health issues
- Democratic voting system for the election of all directors by members



ANTA is a public company limited by guarantee, and is governed by a National Council [Board of Directors] which is elected by the Members of the Association for a term of 3 years. The Council in turn elects all office bearing positions within the Association, which are for a term of 1 year.

National Council is supported by the services of a full time Executive Officer, full time Company Secretary and full time National Administration Office Staff.

ANTA practises a policy of consultation with representatives of all stakeholders of traditional medicine and natural therapies, as well as being available to all government and regulatory bodies associated with the professions.

Persons wishing to discuss with ANTA any matters relevant to the professions of traditional medicine and natural therapies should contact:

Brian Coleman

Executive Officer

Australian Natural Therapists Association Limited

PO Box 657 Maroochydore Qld 4558

Office 1, 106 Sixth Avenue Maroochydore Qld 4558

free-call: 1800 817 577

fax: (07) 5409 8200

email: [info@anta.com.au](mailto:info@anta.com.au)

website: [www.anta.com.au](http://www.anta.com.au)