

2021-22 Pre-Budget Submission



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OneCAM thanks the Federal Government for the opportunity to contribute to discussions regarding the 2021–22 Federal budget.

#### **OneCAM**

care.

OneCAM is a representative body for the majority of Australian complementary medicine practitioners and natural therapies industry associations under one united voice. Our member-base includes practitioners and associations from both ingestive modalities (such as herbal and nutritional medicine), as well as non-ingestive modalities (such as clinical Pilates). OneCAM's agenda to promote positivity around complementary medicine practitioners and the supply chain is conveyed via constructive public relations and advocacy program. We take every opportunity to advocate for the sector and ensure that complementary medicine and natural therapies are positively and fairly represented in the media and at Government level. Historically, complementary medicine and natural therapies have held an important place in health care; people have chosen to use a range of modalities to enhance their health and wellbeing. These modalities provide individuals with meaningful options that align with personal sociocultural, environmental and economic means to achieve and maintain health. Over time, the Australian health care sector has become an environment that increasingly relies on an orthodox model of health care. However, complementary medicine and natural therapies continue to provide significant contributions to preventative, accessible and meaningful care in harmonisation with, rather than in place of, the orthodox model of health

The acknowledgement of environmental, physical and psychosocial contributors to health play a key role in a complementary medicine practitioner's understanding of health, and in line with complementary medicine philosophy, the approach focuses on the prevention of illness and disease, and the restoration, maintenance and optimisation of wellbeing where there has been a deterioration of health. The focus on prevention strategies including an emphasis on nutrition, lifestyle modifications, and the importance of taking personal responsibility for health as fundamental principles for improving quality of life, seeks to avoid



the consequences of a previous disease or illness and reduce the likelihood of the need to seek further medical interventions<sup>1</sup>.

## **Industry Overview**

The complementary medicine and natural therapies sector significantly contributes to the health of Australians and the broader economy via employment, manufacturing and the supply chain.

# • Economic contribution of complementary medicine and natural therapies

There are 22,649 Natural health practitioner businesses in Australia, mostly small and medium sized, delivering treatments including Acupuncture, Naturopathy, Aromatherapy and Traditional Chinese medicine; and employing 34,467 people, mostly highly skilled qualified health practitioners.

COVID has had an impact on the number of people seeing natural health practitioners with initial indications of revenue down in the last year. However, the Australian Natural Therapies sector market was \$4 billion<sup>2</sup>.

# Australians accessing complementary medicine and natural therapies

Approximately 70% of Australians use complementary medicines<sup>2</sup> and the prevalence of use of complementary medicines and natural therapies modalities has remained consistently high over time<sup>3</sup>.

The role of complementary medicine and natural therapies in preventative health

Approximately 50% of Australians suffer from some kind of chronic condition, many of which are preventable, and it is estimated that in 2020 the Australian Government will spend over \$80 billion on medical care<sup>3</sup>, though with the ongoing impacts of the COVID-19 pandemic, spending is likely to surpass this figure. Complementary medicine and natural therapies practitioner services are widely accessed and valued by the

<sup>&</sup>lt;sup>1</sup> Hechtman, L. (2012). Clinical Naturopathic Medicine. Elsevier, Chatswood NSW.

<sup>&</sup>lt;sup>2</sup> IBIS World: Alternative Health Therapies in Australia (October 2020).

<sup>&</sup>lt;sup>3</sup> Steel, A. et al. (2018). Complementary medicine use in the Australian population: Results of a nationally-representative cross-sectional survey. Scientific reports, 8(1), 17325. https://doi.org/10.1038/s41598-018-35508-y



Australian public, as outlined above, and represent a considerable contribution to preventative care. Equipped with a deep understanding of, and appreciation for holistic approaches to health, complementary medicine practitioners are uniquely placed to contribute to positive health outcomes by assisting people to develop longterm preventative health strategies that are tailored to the individual through delivering informed, meaningful and practical approaches.

#### Australia's Health

In the past year, Australia has faced several major public health crises that have required large-scale government intervention—crises that have further highlighted how important health is to our quality of life and overall wellbeing.

In 2017–18, an estimated \$185.4 billion was spent on health goods and services in Australia. Health care costs have increased substantially in Australia over the past 2 decades and during this period, health expenditure has grown faster than inflation and population growth combined. Overall, expenditure on primary health care has grown by an annual average of 3.3% in real terms over the decade to 2017–184, with health expenditure as a share of GDP set to continue to rise across OECD member countries in the coming decade to 2030<sup>5</sup>.

While some primary health goods and services are primarily funded by government through program-specific block grants, including community health programs (largely funded by state and territory governments) and public health programs (funded jointly by Australian and state and territory governments)<sup>4</sup>, in the context of rising health care costs and a growing prevalence of complex, long-term chronic conditions, Australia needs to prioritise ways to improve the sustainability of health care provision and financing.

<sup>&</sup>lt;sup>4</sup> Australian Institute of Health and Welfare. (2020). Australia's health 2020: data insights. Canberra: AIHW

<sup>&</sup>lt;sup>5</sup> OECD (2019), Health at a Glance 2019: OECD Indicators, OECD Publishing, Paris, doi.org/10.1787/4dd50c09-en.



## **Summary of Recommendations**

There is a need for increased Government funding for health prevention initiatives to improve the health and wellbeing of the community and create long term savings for the health budget. There is a significant disparity between funding for research into complementary medicine and natural therapies modalities and the orthodox model of health. The inclusion of further research for these modalities in the national health strategy can contribute to the fulfillment of the social responsibility of the Government to improve health, reduce disease, and reduce health costs where possible.

OneCAM's pre-budget submission identifies public health initiatives requiring greater support, setting out three primary recommendations that address areas of policy development and investment which contributes to the advancement and sustainability of the complementary medicine and natural therapies professional sector, benefiting the health of Australians and the wider economy.

Recommendation 1: Build the evidence base for complementary medicine and natural therapies

 OneCAM calls on the Federal Government to fund the establishment of a dedicated Preventive Health Agency to deliver research into complementary medicine interventions and the translation of evidence into health practice, policy, and population health

Recommendation 2: Expedite the Natural Therapies Review and promote reinstatement of private health rebates for natural therapies

 OneCAM calls on the Federal Government to expedite the Natural Therapy Review tranches 1, and 2, supported by the Natural Therapies Review Expert Advisory Panel and its working committee; and Government support for the reinstatement of natural therapies rebates in private health insurance, at the discretion of the insurer, until such time as the totality of evidence has been reviewed and finalisation of the review has occurred.



Recommendation 3: Support for, and acknowledgement of, the role of complementary Medicine and Natural therapies in mental health and wellbeing

• OneCAM calls on the Federal Government to recognise and promote the role of evidence-based complementary medicine and natural therapies as positive preventive strategies in the management of mental health and wellbeing.



## Building the evidence base for complementary medicine and natural therapies

Issue

There is growing interest in evidence-based practice (EBP) for complementary medicine and natural therapies that includes not only the 'gold standard' of evidence (randomised controlled trials), but also the environmental, psychosocial and sociocultural contexts that contribute to our understanding of health. However, the acknowledgement and representation of the contribution of complementary medicine and natural therapies to preventative public health is lacking. Frequently, these modalities are negatively represented in the media and at Government level. This is, in part, due to a limited public understanding of the role of complementary medicine and natural therapies in preventative health, and a disparity between the prevalence of the use of these modalities and a solid research base to support them, which produces a gap between research and practice.

While the basis of many complementary medicine and natural therapies modalities are steeped in tradition, the curriculum of many of these modalities have foundations in science. The increasing adoption of EBP into complementary medicine and natural therapies curriculum enables practitioners to draw from evidence-based research and empirical knowledge and apply this expertise to clinical practice. EBP encompasses the essential contextual aspects of the client and the available evidence and serves as an integral feature of strengthening clinical practice with the end view of promoting health.

The WHO Traditional Medicine Strategy 2014-2023<sup>6</sup> supports Member States (including Australia) in developing proactive policies and implementing action plans that will strengthen the role of traditional and complementary medicine in keeping populations healthy and promotes the safe and effective use of these modalities through regulation, research and integration of products, practitioners and practice into existing health systems.

Stimulating strategic research into the safety and efficacy of complementary medicine and natural therapies through support for clinical research projects and the promotion of evidence-based use promotes innovation and provides clear benefits to practitioners, the

<sup>&</sup>lt;sup>6</sup> World Health Organization (2014). WHO Traditional Medicine Strategy 2014–2023. Geneva, Switzerland.





wider public and the economy. Specifically, OneCAM believes that there is scope for further exploration of resources that, to date, have not been considered for their potential to contribute to the health and well-being of Australians. In line with international agencies, such as the World Naturopathic Federation (WNF), the Swiss Nutrition Society and Trinity College Dublin, OneCAM seeks the Government's support for further research into the use of nutritional supplementation measures, including vitamin D, during the COVID-19 Pandemic to aid in the prevention of illness and maintenance of health. It was estimated that, in a severe scenario, the loss to GDP in Australia in 2020 due to the impacts of COVID-19 could reach \$US103 billion and will be associated with many unnecessary deaths7. Therefore, with a growing prevalence of complex, long-term chronic conditions, in addition to the apparent inevitability of further challenges related to emerging novel viruses, ways to improve the efficiency and sustainability of health care provision must be prioritised.

#### Action

In order for qualified practitioners to have the necessary tools and knowledge to deliver informed, evidence-based complementary medicine and natural therapies recommendations, OneCAM calls on the Federal Government to fund the establishment of a dedicated preventive health agency with a view to develop and promote high quality, independent research into complementary medicine and natural therapies.

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<sup>&</sup>lt;sup>7</sup> McKibbin, W., Fernando, R. (2020). The global macroeconomic impacts of COVID-19: Seven scenarios. Crawford School of Public Policy, ANU Centre for Applied Macroeconomic Analysis.

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Unity in Healthcare

# **Natural Therapies Review**

Issue

As a result of a review chaired by the former Commonwealth Chief Medical Officer which found there was no clear evidence demonstrating the efficacy of 16 complementary medicine and natural therapy modalities, these modalities were subsequently removed from their eligibility for private health insurance rebates in April 2019. While complementary medicine and natural therapies significantly contribute to positive preventative health outcomes, disease prevention was not the focus of the review. This creates a disparity of outcome measures, and therefore disregards the preventative role of these modalities.

An estimated 54% of the Australian population is covered by extras insurance<sup>8</sup> and prior to the removal of 16 natural therapies modalities from their eligibility for private health insurance rebates in April 2019, the number of natural therapies services claimed under private health insurance ancillary cover grew at a strong rate, with 6.8 million services claimed in the year through to March 2019<sup>9</sup>. This demonstrates the wide public use of complementary medicine and natural therapies across Australia.

As an update to the 2014-15 review of natural therapies, the current 2019-2020 Natural Therapies Review (NTR), led by the Chief Medical Officer (CMO), aims to assess additional available evidence for natural therapies, including undertaking public consultation, and to provide advice to the Government on whether certain natural therapies should be eligible for rebates through the private health insurance rebate.

While OneCAM acknowledges the update to the NTR and appreciates the opportunity to provide further evidence to inform the assessment of these modalities, consumers and providers of complementary medicine and natural therapies have been, and continue to be, negatively impacted.

<sup>&</sup>lt;sup>8</sup> Australian Government Department of Health (2019). Private health insurance reforms: Changing coverage for some natural therapies (accessed 5 August 2020).

<sup>&</sup>lt;sup>9</sup> Richardson, A. (2019). IBISWorld INDUSTRY REPORT X0015 Alternative Health Therapies in Australia.



Despite claims that the removal of these modalities would remove costs from the system and contribute to reducing private health insurance (PHI) premium growth<sup>8</sup>, a potential rise in PHI may result for current policy holders, due to individuals who have chosen to discontinue their policy because of the removal of these services<sup>10</sup>. In addition, increases in PHI withdrawal may result, diverting consumers, and expenses, to the public sector. This is problematic for a number of reasons:

- impacting general practice by increasing the burden on GPs as well as increasing
  Medicare and pharmaceutical benefit scheme (PBS) costs; and
- increasing waiting times to see a doctor which may result in delays to referrals, diagnosis and treatment, leading to avoidable hospitalisations<sup>10</sup>.

Further, according to the WHO Traditional Medicine Strategy 2014-2023<sup>6</sup>, Member States (including Australia) are encouraged to consider how to integrate traditional and complementary medicine into their health systems and include universal health coverage (UHC) plans more comprehensively, as emerging evidence shows that, when included in UHC plans, traditional and complementary modalities have the potential to reduce costs and pressure on the public health system. With the mounting expenditure across the health care sector, the exclusion of complementary medicine and natural therapy modalities from PHI rebates does nothing to improve preventative health outcomes and service delivery, in addition to detrimentally impacting and disadvantaging consumers by disregarding individual and cultural preferences for health care<sup>10</sup>.

The letter from Private Healthcare Australia to Minister Hunt, dated 19 November 2020, advocates for the halt of the natural therapies review and calls for the repeal of the list of therapies that private health insurance is currently unable to cover, thereby allowing the funding of those therapies to be left to the discretion of the individual funds. While OneCAM agrees that the coverage of natural therapies modalities should be left to the discretion of the insurer, we also acknowledge the value of the reassessment of high-level

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<sup>&</sup>lt;sup>10</sup> Leach, M. J., Steel, A. (2018). The Potential Downstream Effects of Proposed Changes in Australian Private Health Insurance Policy: The Case for Naturopathy. *Advances in Integrative Medicine*. doi.org/10.1016/j.aimed.2018.04.001



evidence for Tranche 1 and 2 modalities that is occurring through the current review. OneCAM also appreciates the great deal of effort and resources that have gone into the collation of this evidence to support the efficacy of complementary medicine and natural therapies.

Now more than ever, consumers need to maintain access to complementary medicine and natural therapy products and services, including professionally recommended products, services and consultations provided by appropriately qualified practitioners, to ensure consumers are receiving evidence-based lifestyle, supplementary and nutritional support to proactively achieve and maintain improvements to their health and wellbeing.

Therefore, until such time as the totality of evidence submitted to the natural therapies review has been reviewed and the finalisation of the review has occurred, OneCAM calls for the Government to support private health insurers to reinstate rebates for natural therapies modalities at their discretion.

### Action

OneCAM calls on the Federal Government to expedite the Natural Therapy Review of tranches 1, and 2 modalities, supported by the Natural Therapies Review Expert Advisory Panel and its working committee. In addition, OneCAM calls for the Government to allow private health insurers to reinstate rebates for natural therapies at their discretion, until such time as the review and outcomes have been finalised.



# Complementary Medicine and Natural therapies in mental health and wellbeing

#### Issue

Mental well-being is a fundamental component of health<sup>11</sup>. It is widely accepted that mental health can be affected by a number of factors, including, genetic, socioeconomic and environmental aspects of an individual's life, and that an association exists between mental and physical health; people who struggle with mental health issues are at higher risk of developing a physical illness and tend to die earlier than the general population<sup>11, 12</sup>. It is estimated that in any given year 1 in 5 people aged between 16-85 will experience a mental health disorder<sup>13</sup>. Certainly, the COVID-19 pandemic has amplified serious concerns for many about the mental health and wellbeing of Australians. It has also highlighted the importance of practical, accessible and affordable strategies to improve our nation's mental health and wellbeing as people struggle to cope with social distance, isolation and a plethora of other associated socioeconomic and lifestyle impacts<sup>14</sup>. As a result, many Australians will turn to drugs, alcohol and unhealthy dietary and lifestyle choices in order to cope with stress and anxiety<sup>15</sup>.

Practitioner research demonstrates that conditions relating to mood and stress are among the most common conditions for which people sought assistance from a natural therapists or complementary medicine practitioner, and that stress and anxiety affect 23% and 17%, of patients, respectively<sup>16.</sup>

There are a number of reasons why individuals seek complementary medicine and natural therapies interventions in the treatment of mood and stress conditions. These include an alignment of these interventions with personal values and beliefs, a dissatisfaction with the conventional model of care, a sense of autonomy associated with choice, and a belief in their

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<sup>&</sup>lt;sup>11</sup> World Health Organization (2013). Mental health action plan 2013–2020

<sup>&</sup>lt;sup>12</sup> Lawrence, D. et al. (2013). The gap in life expectancy from preventable physical illness in psychiatric patients in Western Australia: retrospective analysis of population based registers. BMJ, 346 doi: 10.1136/bmj.f2539

<sup>&</sup>lt;sup>13</sup> ABS (Australian Bureau of Statistics) 2008. National survey of mental health and wellbeing: summary of results, Australia, 2007. ABS cat. no. 4326.0. Canberra: ABS.

<sup>&</sup>lt;sup>14</sup> Australian Institute of Health and Welfare (AIHW) (2020). Mental health services in Australia. Retrieved from: https://www.aihw.gov.au/reports/mental-health-services/mental-health-services-in-australia

<sup>&</sup>lt;sup>15</sup> World Health Organization (2020). Mental health and COVID-19. Viewed 21 January 2021.

<sup>&</sup>lt;sup>16</sup> Thrive Insights (2019).



ability to perform self-care<sup>17</sup>. Complementary medicine and natural therapy practitioners, as part of their philosophy of practice, foster approaches which support positive mental health outcomes through the provision of evidence-based information and empowerment; encouraging patient's self-sufficiency and self-efficacy.

A review on promotion of self-help strategies for early intervention against depression and anxiety found that the dissemination of informal self-help strategies for sub-clinical depression and anxiety, which have evidence for effectiveness, are highly acceptable to the public, easily applied, inexpensive and may avert the development of many clinical cases<sup>18</sup>. These strategies include vitamin and herbal supplementation and lifestyle modifications including exercise, and relaxation and mindfulness techniques. These preventive strategies have the capacity to deescalate the severity of stress, anxiety and depression, and potentially avoid the many comorbidities that may occur when clinical symptoms arise.

Natural therapists and complementary medicine practitioners have the ability, skills and knowledge to appropriately guide patients through these strategies, assisting individuals to proactively address and manage feelings of stress and anxiety. These benefits not only serve to improve the lives of individual patients, but also the wider economy; contributing to savings in health care at a time when resources are strained; and reducing the burden on an already over-loaded health system.

OneCAM believes that complementary medicine and natural therapies can play a pivotal role in responsibly supporting patients and working with the broader medical professional sector to provide the best possible outcomes for patients who may be struggling with mental health and well-being issues.

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depression and anxiety. Psychol Med. 36(1). pp 3-6. doi: 10.1017/S0033291705005659

<sup>&</sup>lt;sup>17</sup> Clayton, K. et al. (2018). Decision-making factors of pharmacy customers purchasing over-the-counter complementary and alternative medicine for stress. Advances in Integrative Medicine, 4(3). pp 103-8 doi:10.1016/j.aimed.2017.12.007 <sup>18</sup> Jorm, A. F. & Griffiths, K. M. (2006). Population promotion of informal self-help strategies for early intervention against



# Action

OneCAM calls on the Federal Government to recognise and promote the role of evidencebased complementary medicine and natural therapies as positive preventive strategies in the management of mental health and wellbeing.