



# OneCAM

## Unity in Healthcare

2022-23 Pre-Budget Submission



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OneCAM thanks the Federal Government for the opportunity to contribute to discussions regarding the 2022–23 Federal budget.

## OneCAM

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. 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 care.

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 supportive prevention strategies, including nutrition, lifestyle modifications, and an emphasis on 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>.

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



## 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.

- **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>. Particularly, within the last year where a rise in consumers seeking support for immunity and wellbeing due to the COVID-19 pandemic has been observed<sup>2</sup>.

- **Economic contribution of complementary medicine and natural therapies**

The Australian complementary medicine industry continues to outpace growth in the broader market by contributing \$5.69 billion to the economy<sup>2</sup>.

- **The role of complementary medicine and natural therapies in preventative health**

Approximately 50% of Australians suffer from one or more [preventable] chronic conditions, with an increase in prevalence of chronic conditions occurring in the last decade<sup>4</sup>. The ongoing impacts of the COVID-19 pandemic continue to impact Australians and complementary medicine and natural therapies practitioner services represent a considerable contribution to preventative care and are widely accessed and highly valued by the Australian public. 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 long-term preventative health strategies that are tailored to the individual through delivering informed, meaningful and practical approaches.

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<sup>2</sup> CMA Industry Audit 2021: <https://cma.mailscampaign.com/flip/>

<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>

<sup>4</sup> Australian Institute of Health and Welfare, 'Australia's Health 2018, 3.3 Chronic Conditions' <https://www.aihw.gov.au/getmedia/6bc8a4f7-c251-4ac4-9c05-140a473efd7b/aihw-aus-221-chapter-3-3.pdf.aspx>



## Australia's Health

In the past two years, 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 two 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 2017–18<sup>5</sup>, with health expenditure as a share of GDP set to continue to rise across OECD member countries in the coming decade to 2030<sup>6</sup>.

While some primary health goods and services are primarily funded by government through program-specific block grants. These include community health programs (largely funded by state and territory governments) and public health programs (funded jointly by Australian and state and territory governments)<sup>5</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.

## 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 support for access to, and 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 benefit the health of Australians, the wider economy and the advancement and the sustainability of the complementary medicine and natural therapies professional sector.

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<sup>5</sup> Australian Institute of Health and Welfare. (2020). *Australia's health 2020: data insights*. Canberra: AIHW

<sup>6</sup> OECD (2019), *Health at a Glance 2019: OECD Indicators*, OECD Publishing, Paris, [doi.org/10.1787/4dd50c09-en](https://doi.org/10.1787/4dd50c09-en).



**Recommendation 1: Abolish the ban on natural therapies private health rebates; Expedite the Natural Therapies Review**

- OneCAM calls for the Federal Government to abolish the ban on natural therapies rebates in private health insurance and to leave the decision on which therapies are covered to the discretion of the insurer until such time as the totality of evidence has been reviewed and finalisation of the review has occurred.
- OneCAM calls on the Federal Government to expedite the Natural Therapy Review supported by the Natural Therapies Review Expert Advisory Panel and its working committee.

**Recommendation 2: 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 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.



## Abolish the ban on natural therapies private health rebates; Expedite the 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>7</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>8</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) Professor Paul Kelly, 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.

As detailed in OneCAM's 2021-22 pre-budget submission, 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>9</sup>. In

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<sup>7</sup> Australian Government Department of Health (2019). Private health insurance reforms: Changing coverage for some natural therapies (accessed 5 August 2020).

<sup>8</sup> Richardson, A. (2019). IBISWorld INDUSTRY REPORT X0015 Alternative Health Therapies in Australia.

<sup>9</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](https://doi.org/10.1016/j.aimed.2018.04.001)



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 their health care<sup>10</sup>.

Throughout the current pandemic many have sought the assistance and support of their complementary health and natural therapies practitioner and the option of visiting a complementary health practitioner has generally reduced the burden on the broader health system at a time when critical funding for health services is required. Now more than ever, Australians 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 our communities are supported to proactively achieve and maintain improvements to their health and wellbeing.

Private Healthcare Australia's (PHA) letter 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 evidence for Tranche 1 and 2 modalities that is occurring through the current review.





Similarly, the recent Your Health Your Choice (YHYC) '[restore our rebates](#)' campaign also advocates for the reinstatement of natural therapies private health rebates and for the Government to bring the 2019-20 Natural Therapies Review to a close.

This sentiment was communicated by OneCAM to the Ministers for Health in Australia in January 2022, in which OneCAM provided that the opportunity to participate in the Natural Therapies Review process was valued by the sector and that OneCAM acknowledges that a considerable amount of time, effort and resources have been expended, by both the complementary medicine and natural therapies Sector, and the Government to implement and progress the Review. However, delays in the progress of Natural Therapies Review 2019-2020 have resulted in the Review far exceeding the 2019-2020 timeframe, with further extended timeframes for the Review announced to late 2022. These delays are highly concerning and are considered unacceptable for the practitioner sector, as well as for many Australians who are significantly impacted by this compromise to access health care modalities of their choosing.

Now more than ever, consumers need to maintain access to natural therapies and complementary medicine modalities, including health products; both self-selected and via the advice of appropriately qualified complementary medicine practitioners, to ensure they receive individualised support to proactively maintain their physical health and psychological wellbeing. Our practitioners have the willingness and expertise to work integratively and provide this vital support to our communities during this challenging time.

OneCAM is in support of Private Healthcare Australia's position; and the Your Health Your Choice 'restore our rebates' campaign, and considers that this approach provides a fair and practical solution for both practitioners and the Australian public.

#### Action

- OneCAM calls on the Federal Government to repeal the list of therapies that private health insurance is unable to cover and the funding of those therapies left to the discretion of the funds, until such time as the review and outcomes have been finalised.
- OneCAM calls on the Federal Government to expedite the Natural Therapy Review, supported by the Natural Therapies Review Expert Advisory Panel and its working committee.



## Build 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 World Health Organisation (WHO) Traditional Medicine Strategy 2014-2023<sup>10</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 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

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<sup>10</sup> World Health Organization (2014). WHO Traditional Medicine Strategy 2014–2023. Geneva, Switzerland.



Australians. For example, in line with international agencies, such as the World Naturopathic Federation (WNF), The Swiss Federal Food Safety and Veterinary Office, The Swiss Nutrition Society, and Trinity College Dublin, OneCAM seeks the Government's support for further research into the use of nutritional supplementation measures, particularly in light of the enduring COVID-19 Pandemic, to aid in the prevention of illness and maintenance of health for all Australians. With a growing prevalence of complex, long-term chronic conditions, in addition to the apparent inevitability of further challenges related to emerging novel viruses, Australia needs to prioritise ways to improve the sustainability of health care provision.

### 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, which necessarily involves representative associations and bodies such as OneCAM, with a view to develop and promote high quality, independent research into complementary medicine and natural therapies.



## Support for, and acknowledgement of, the role of 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 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 may 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 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 empowerment;

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<sup>11</sup> World Health Organization (2013). [Mental health action plan 2013–2020](#)

<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>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>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>15</sup> World Health Organization (2020). [Mental health and COVID-19](#). Viewed 21 January 2021.

<sup>16</sup> Thrive Insights (2019).

<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



encouraging patient's self-sufficiency and self-efficacy; and the provision of evidence-based information.

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.

### Action

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.

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<sup>18</sup> Jorm, A. F. & Griffiths, K. M. (2006). Population promotion of informal self-help strategies for early intervention against depression and anxiety. *Psychol Med.* 36(1). pp 3-6. doi: 10.1017/S0033291705005659