

CONSULTATION PAPER FOR THE NATIONAL PREVENTIVE HEALTH STRATEGY

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Introduction

The Australasian College of Nutritional and Environmental Medicine (ACNEM) is a leader in education and training of medical and allied health practitioners. We are an independent, not-for-profit organisation whose mission is **to support and promote nutritional and environmental medicine (NEM) through independent, evidence-based education.** For 40 years we have focused our educational offering on this important area of medicine which draws on the latest biomedical and genetic science and research to develop new treatment approaches to illness and disease, for primary prevention and to promote optimal health and well-being.

ACNEM welcomes this opportunity to provide feedback to the National Preventative Health Strategy (the Strategy). ACNEM supports in its entirety the Department of Health's stated philosophy of: "Health is not just the presence or absence of disease or injury – more holistically it is a state of wellbeing."

ACNEM's vision is **to transform global health through science and education** and we look forward to working with the Department to ensure a healthy and vibrant future for all Australians.

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Vision and Aims of the National Preventative Health Strategy

4. Are the vision and aims appropriate for the next 10 years? Why or why not? Agree:

- ACNEM strongly supports a health model consistent with the stated **life course** approach as integrative medicine (IM) which encapsulates NEM is good wellbeing throughout life from the early to end stages of living.
- ACNEM believes a health strategy to ensure Australians live as long as possible is appropriate. Integrative medicine is in essence preventative healthcare as it demands an understanding of the whole patient and their relationship with the environment, society and culture as influences on health.



- Facilitating improved health gains to Australians **burdened unfairly** due to personal circumstances is a vital aim if all the nation is to enjoy good health.
- **Investment in prevention** should be dramatically increased as current treatment of illness and disease is not addressing the underlying causes, thus treating the illness not the individual. A healthy human body demands quality nutrition, sleep and mental and spiritual fitness and the Strategy should aim to incorporate every facet to work toward disease prevention.
- ACNEM strongly agree with the Strategy aim of improved environments to promote physical and mental wellbeing. Humans have increasingly caused significant harm to themselves and the planet by prioritising economic and population growth over environmental and social consequences. The Strategy must embrace essential change to the environments Australians are living, working and cultivating.
- ACNEM strongly agrees with the aim to help Australians **live as long as possible**, but also to live as well as possible. We support a strategy aiming to help Australians live longer through accessible health and wellness, but seek to clarify if the intent of the Strategy is about chronic disease management or about a system focused on health and wellness.

Recommendations:

ACNEM recommends that:

- The Strategy should aim to ensure a percentage inclusion of **holistic approaches** to healthcare. The strategy should include public education and promotion of simple and predominantly free lifestyle changes to disease prevention such as a good night's sleep. Consistent good sleep is central to every measure of health physical, mental and emotional. Science tells us that when the human body is rested people are able to make the right decisions about their health, their hormonal response to what they eat is more conducive to good health and their decisions to move/exercise more are successful and their mental health improves.
- Oral health should be included in the Strategy's aims. Oral disease is one of the most common non-communicable diseases with links to cardiovascular diseases, diabetes, auto-immune conditions and cancer. Oral health needs to be included as a vision and aim in the Strategy such as increased public education as to the role of oral health in wellbeing.



Mandatory education in integrative medicine for all doctors and allied healthcare workers. Resources in integrative medicine must be available at individual and community levels with incentives for community programs to help every Australian make the right decisions every day, based on the best that science and medicine have to offer.

Goals of the National Preventative Health strategy

5. Are these the right goals to achieve the vision and aims of the Strategy? Why or why not? Is anything missing?

Agree:

- ACNEM supports a **framework to better support work already underway across Australia** to deliver improved health outcomes in the early years and throughout life. A plethora of organisations employing thousands of people across Australia work daily to improve health and the Strategy must bring this collective good together to work on the 'whole' person not just the disease.
- Boosting **action in focus areas** is crucial and ACNEM strongly supports this vital step to national wellbeing. Reducing tobacco use, improving diet and improving physical activity are all paramount to health and wellbeing but ACNEM advise societal behaviour change as the missing link for success. We can increase cancer screening numbers, reduce alcohol consumption and improve immunisation but education on principles of nutritional and environmental healthcare should be the precursor for the public and practitioners alike Strategy should aim to prevent cancer and chronic diseases through healthy lifestyle and environment over increased cancer screening programs.
- ACNEM supports the Strategic goal to ensure efforts will be adapted to emerging issues and new science. ACNEM seeks clarification of the process for selecting the 'new science', recommending that it must be non-biased with strong consideration to independent studies and research not connected, funded or associated with the food and pharmaceutical industry.
- ACNEM supports the goal **to enable all individuals to make the best possible decisions** about their personalised health but recommends that it must include health care policy and private health care insurers. Personalised healthcare may not be accessible or affordable to everyone and the Strategy needs to ensure support of health insurers to prioritise individualised healthcare.



Disagree:

- **Better health by 2030** is only achievable if integrative medicine is included in the national health conversation. Integrative medicine, in essence preventative health, can be the glue which connects existing health networks together to provide a coordinated approach to lifestyle, health and wellbeing. Integrative medicine considers the social and built environment of a person as important factors to good health.
- Continuing strong foundations and work already underway is not strategic for the future. Many processes and procedures currently in place are ineffective and many Australians are still suffering avoidable ill health. The goal of the Strategy must be to continue to support, adopt and promote science and education but also to be bold and adopt new policies and procedures to fix the disease-based health care system and education of health care providers.

Recommendations:

ACNEM recommends that:

- Mobilising a prevention system is paramount, but the Strategy must ensure the processes of the health sector lead to action and not merely a series of 'check-boxes' for patient care. The Strategy must build appropriate infrastructure and health care settings to support real patient care to ensure when a person enters the system the opportunity to help them is not lost through systems and procedures.
- A goal of the strategy must be to facilitate behaviour change to empower patients, practitioners and individuals to make positive decisions about their personalised health. Australians accountable for their own health will lead to a sustainable healthcare model and thus reduce the burden of our current tertiary health care model. ACNEM believes that accountability is only possible with education and asks for increased health professional training in integrative medicine. Individuals need to first understand what constitutes healthy living as a priority over public education in symptom alleviation or pharmaceutical benefits.
- The environments in which people live, work, learn and play influence our ability to be healthy and live productive and fulfilling lives. This goal needs to include improving the hospital setting with the aim of improved recoveries and shorter admissions. Examples include ensuring there is fresh, healthy meals in place of highly processed nutrient-deplete hospital food. This is particularly important as many individuals, especially the elderly, are nutrient deplete on admission to



hospital and this impacts on their response to medical treatment, surgical recover and complication rates. The built environment of the hospital setting must also be changed to ensure adequate fresh air for patients and staff alike. Similarly, the school settings need to ensure green space, fresh air and non-toxic building materials. Many individuals in our community suffer health impacts from mould and other toxicity from the built environment. This can be a significant underlying factor in multiple system dysfunction and chronic illness. The Strategy should include aims and goals to ensure a healthy built environment for all Australians.

ACNEM strongly recommend the need for a clear definition of 'new science'.
Current bias for conventional, pharmaceutically based forms of medicine is currently not aligned with preventative healthcare. The 'latest pharmaceutical product' does not define 'new science' or best practice. Australia needs a Strategy goal that ensures 'new science' is evidence-based without bias and independent studies need to be given greater consideration.

Mobilising a Prevention System

6. Are these the right actions to mobilise a prevention system?

Agree:

- Nutritional and environmental medicine (NEM) is the interaction of nutritional and environmental factors with human biochemistry and physiology. NEM is evidence based and draws on biomedical and genetic science for primary prevention and to promote optimal health and well-being. As such, ACNEM strongly support the Strategy's desire for a **prevention system.**
- ACNEM supports the importance of an agile and flexible health system to enhance Australia's ability to respond to large-scale emergencies. Emerging health risks are now varied, global, complex and catastrophic. The solutions need to be national, globally collaborative and multi-disciplinary. ACNEM again reiterates the feedback that the Strategy needs to look more to the future of unknowns in healthcare rather than build on our existing frameworks.
- As highlighted in the Strategy the capacity and capability of the **workforce** will be integral to the prevention system achieving success. ACNEM recommends the education and training of all health professionals in a myriad of health and wellness disciplines, at both undergraduate and post-graduate levels that are affordable, accessible and effective. ACNEM provides practitioners with structured training in nutritional and environmental medicine with the aim to create a



healthcare system which consistently considers the 'whole patient' and a personalised health care model – with the patient (not the health care system) at the centre.

- Monitoring and surveillance of key disease data is a highly valuable enabler to preventative healthcare. As educators of medical professionals ACNEM acknowledges the importance of understanding medical trends and how they may be evolving over time. In a rapidly changing world ACNEM warns of the emergence of many new and worrying health trends unseen in humanities history. ACNEM works to educate health professionals to future proof medicine and urges the Strategy to consider resources to predict emerging trends which will inform prevention policy and practice as well as the monitoring of historic data.
- The Strategy outlines the need for a stronger partnership between researchers and policy makers to improve the translation of evidence. While ACNEM strongly agrees with this, it urges caution to ensure this process does not narrow the research field. Rather than dilute the academic and scientific field to a cohort manageable for the Department, ACNEM recommend opening the research and scientific fields to those researching therapeutic, holistic or sustainable practices. Similarly, ACNEM caution a strong relationship between policy makers and researchers who are funded by industry or pharmaceutical organisations.

Recommendations:

ACNEM recommends that:

- ACNEM recommends inclusion of a further enabler **social health and wellbeing**. Loneliness and social isolation so candidly on display during COVID-19 have extreme detrimental effects on individual's health and wellbeing and ultimately therefore whole communities. A vital and crucial enabler for the prevention system is a focus on the mental wellbeing of Australians. As the Strategy highlights, there is a need to reorientate the health system to once again promote health. ACNEM advise the definition of 'health' must always include mental, physical and social health as well as the presence or absence of disease.
- Science and evidence tell us that a vital enabler to health prevention is the inclusion of integrative medicine in national health policy. Whilst we agree with efforts of the Strategy to prepare the infrastructure of the health care system to cope with new health threats, ACNEM believes it is also equally important to prepare our population at a biological level for potential emergencies. This is attainable by the Department including and consulting with organisations like



ACNEM who can offer decades of skills, research and resources in preventing chronic disease and boosting human immunity. Organisations like ACNEM who are working in the field of integrative health education and promotion have the ability to help build a society which cares deeply about health and wellbeing for future generations.

- ACNEM recommends a further enabler of improved mindset and empowerment to create a successful prevention system. ACNEM know even the smallest of lifestyle changes can make an enormous impact on an individual's health and wellbeing. Depression is linked to lifestyle habits including poor diet, lack of exercise and lack of restful sleep. The youth of Australia have never lived a more sedentary lifestyle. ACNEM believe a prevention system should start at the beginning by ensuring improved daily habits for people to ultimately take the pressure off the system down the track. Preventative strategies for human health and wellbeing must ultimately start in the household where parents influence children and generations grow to continue to promote good healthy habits. Public and practitioner education in integrative medicine is a crucial first step to helping society improve mindset and empowerment to lead healthier lives.

Boosting Action in Focus Areas

7. Where should efforts be prioritised for the focus areas?

Recommendations:

ACNEM acknowledge the **six focus areas** identified in the Strategy and agree their efficient management will improve health outcomes across all stages of life.

ACNEM education is built on **four key pillars of health** underpinning wellbeing and believes that if any of these pillars are not met, an individual is at risk of illness. The Strategy must include working to secure the basics of good human health. If we get this right, generations of healthy Australians will live healthy and happy lives.

ACNEM recommend that accelerated action in each of the four key pillars below will significantly decrease the overall burden of disease in Australia and make the suggested six focus areas unnecessary.

a) Healthy diet and good nutrition: ACNEM are committed to educating medical and allied healthcare practitioners about the science of nutrition which is evidence-based and independent of industry. Hippocrates said, 'let food be thy medicine and let medicine be thy food'. We know the Western diet is responsible for the epidemic of obesity and a major contributor to most if not



all chronic illness. Environmental factors influence the quality of our foods and the Strategy must include procedures to secure a sustainable and healthy food production for the future as well as a crucial focus on what Australians eat.

- b) Adequate physical activity: ACNEM is committed to educating medical and allied healthcare practitioners about the importance of physical activity to wellbeing and the contribution of physical inactivity and sedentary lifestyle to ill health. Physical activity reduces the risk of many illnesses and disease and promotes optimal physical and mental welling as well as healthy aging. As the Strategy acknowledges we must work to increase Australians physical activity in a bid to decrease the overall burden of disease in Australia.
- c) Good sleep: ACNEM is committed to educating practitioners on the importance of sleep to wellbeing and its contribution to both physical and mental health. A consistently good night's sleep impacts every aspect of our physical, mental and emotional wellbeing. Many factors can adversely impact on our sleep including stress, technology and food. Poor sleep interacts with many conditions including anxiety, depression and chronic pain to name only a few. As mentioned previously the Strategy musty include actions to promote and educate Australians on the most basic of preventative healthcare measures.
- d) A healthy environment: ACEM is committed to educating practitioners and the public on how environmental factors can both adversely and positively impact on health. ACNEM aims to empower patients to make necessary changes to their environment to improve their wellbeing. ACNEM is Australia's leading educator in environmental medicine and believes all health practitioners must have an understanding of how our environment impacts our health.

Continuing Strong Foundations

8. How do we enhance current prevention action?

Agree:

- ACNEM agrees with the need for a **stronger and better coordinated prevention system** in healthcare to alleviate the often doubling up of organisations dedicated to the same improved health outcomes. Government, non-government organisations, communities and cultures are all dedicated to improving the health of their citizens and the Strategy must ensure resources are not wasted targeting the same community with similar health messages from multiple organisations.



 ACNEM strongly support the Strategy's aim to build on existing frameworks dedicated to mental health, oral health and sexual and reproductive health.

Disagree:

The Strategy will enhance delivery of existing strategies and plans though a stronger and better-coordinated prevention system. ACNEM believe only a new and future focused framework will be successful. Do not spend money on improving old processes which have thus far failed. This is the opportunity, through the new Strategy, to changes the system and depart from outdated models of care that are proven to be ineffective.

Recommendations:

ACNEM recommends that:

- The Strategy to **continue strong foundations** in the healthcare system is reviewed and advise that a return to education on how the simplest of lifestyle changes can prevent, improve or eradicate many chronic conditions. Rather than building foundations to treat individual diseases and the pharmaceuticals management of chronic conditions, we must empower Australians to be active participants in their own health journey.

Additional Feedback/Comments:

9. Any additional feedback/comments?

- The Steering Committee lacks representation from organisations and services dedicated to mental health.
- The Steering Committee lacks a peak body or association representing integrative medicine such as ACNEM. ACNEM can provide invaluable insights to all action areas such as research, partnerships, health promotion and literacy.
- The Steering Committee lacks advocacy associations representing paediatrics, children and adolescents.
- The Strategy needs to review current prescribing practices in Australia, given proven low efficacy. Our current model of healthcare is not preventative but reactive and relies heavily on prescriptive drugs and medicine. Many drugs have



serious and unacceptable side effects yet still remain part of our healthcare system. Doctors need to be educated not to be dependent on pharmaceuticals

- The Strategy must include a review of Australian prescribing practices
- The Strategy musty consider the role of consumerism, the consumer and related industries as paramount to improving preventative health.
- The Strategy should be more inclusive, collaborative and proactive focused on the best that healthcare has to offer, where public health rather than commercial interests drives public health policy, and ultimately outcomes.

ACNEM welcomes this opportunity to provide feedback and recommendations to the National Preventative Health Strategy. Please contact me on 0468 511 014 if you would like to discuss any of these points further.

Kinds Regards,

Andrea Lott

Executive Director, ACNEM