



**Submission  
to the  
Inquiry into the Hearing  
Health and Wellbeing of  
Australia**

December 2016

## About National Seniors Australia

National Seniors Australia is a not-for-profit organisation that gives voice to issues that affect Australians aged 50 years and over. It is the largest membership organisation of its type in Australia with more than 200,000 members and is the fourth largest in the world.

**We give our members a voice** – we listen and represent our members' views to governments, business and the community on the issues of concern to the over 50s.

**We keep our members informed** – by providing news and information to our members through our Australia-wide branch network, comprehensive website, forums and meetings, bi-monthly lifestyle magazine and weekly e-newsletter.

**We provide a world of opportunity** – we offer members the chance to use their expertise, skills and life experience to make a difference by volunteering and making a difference to the lives of others.

**We help our members save** – we offer member rewards with discounts from thousands of businesses across Australia. We also offer exclusive travel discounts and more tours designed for the over 50s and provide our members with affordable, quality insurance to suit their needs.

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## Introduction

National Seniors welcomes the opportunity to make a submission to the Inquiry into the Hearing Health and Wellbeing of Australia. This submission addresses a number of relevant Terms of Reference and provides specific recommendations for consideration.

National Seniors has a particular interest in hearing loss due to the increased prevalence among older Australians. It has been estimated, for example, that more than one-third of the Australian population over 70 experience or are likely to experience hearing loss<sup>1</sup>.

National Seniors believes that more needs to be done to address the preventable causes of hearing loss. Action must be taken to reduce occupational and recreational induced hearing loss through innovative public awareness campaigns. Reviewing workplace health and safety regulations and guidance is also required to ensure that risks in the workplace are reduced.

National Seniors supports current arrangements to subsidise hearing services but are conscious that many older people do not qualify for free or subsidised hearing services. The significant costs of hearing aids and cochlear implants often leaves seniors with significant out-of-pocket expenses or results in seniors avoiding purchasing hearing aids altogether, even though they may require them.

National Seniors believes that eligibility for free or subsidised hearing services should be extended to ensure that more seniors have access to these services. National Seniors also believes that seniors should have better access to hearing aid bank services as an alternative to public and private hearing services.

National Seniors is also disappointed with the lack of competition or price transparency in the retail market for hearing aids. Our members often feel pressured into purchasing more expensive hearing aids without any real understanding of the comparative cost benefit of the product being sold. National Seniors believes that increased competition and price transparency in the market for hearing aids is required to ensure greater consumer choice.

The current causes and costs of hearing loss, and ear or balance disorder to the Australian health care system should existing arrangements remain in place.

Recommendation/s

- 1. National Seniors recommends that an up-to-date study be undertaken to ascertain the current and future incidence and cost of hearing loss in Australia.**
- 2. National Seniors recommends that the Commonwealth Government develop innovative awareness campaigns, which educate people about the importance of hearing protection and promote best practice hearing protection in the workplace.**
- 3. National Seniors recommends that the Commonwealth Government review the Workplace Health and Safety Act and the National Code of Practice for Noise Management and Protection of Hearing at Work to ensure that they offer adequate protections and guidance to reduce workplace related hearing loss.**

Hearing loss is caused by a range of factors and behaviours. It is caused by exposure to unacceptable noise levels and exposure to chemicals from medications, smoking and other environmental agents, which cause damage to the cochlea. Hearing loss is also attributable to the wear and tear of ageing<sup>1</sup>.

These factors and behaviours combine to impact on hearing capacity in later life, resulting in significant hearing loss among older people. Roughly 75 per cent of moderate or greater hearing loss is adult-onset worldwide<sup>2</sup>.

Unfortunately, there is not adequate information about the current and future extent or cost of hearing loss in Australia. The most recent estimates show that the proportion of the population with hearing loss will increase from 1 in 6 in 2005 to 1 in 4 by 2050<sup>3</sup>. This analysis was undertaken 10 years ago<sup>4</sup>, which is unlikely to take into account the impact of rapid changes occurring within society. National Seniors believes that up-to-date analysis is required to better understand the current and future incidence and cost of hearing loss in Australia.

Hearing loss has significant impacts on the health and wellbeing of the individuals who experience it. This includes problems with communication, poor social relations, mood disorders, stress and social anxiety and poorer educational and employment outcomes among others<sup>5</sup>. Hearing loss can also impact on workforce productivity. There were, for

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<sup>1</sup> Access Economics 2006. *Listen Hear! The Economic Impact and Cost of Hearing Loss in Australia*. Access Economics, February 2006. <http://audiology.asn.au/public/1/files/Publications/ListenHearFinal.pdf>

<sup>2</sup> Safe Work Australia 2010. *Occupational Noise-induced Hearing Loss in Australia: Overcoming barriers to effective noise control and hearing loss prevention*. Commonwealth of Australia: Canberra. [http://www.safeworkaustralia.gov.au/sites/swa/about/publications/Documents/539/Occupational\\_Noiseinduced\\_Hearing\\_Loss\\_Australia\\_2010.pdf](http://www.safeworkaustralia.gov.au/sites/swa/about/publications/Documents/539/Occupational_Noiseinduced_Hearing_Loss_Australia_2010.pdf)

<sup>3</sup> Access Economics 2006. *Ibid.*

<sup>4</sup> Access Economics 2006. *Ibid.*

<sup>5</sup> Hogan, A. and Phillips, R. 2014. *A Fairer Hearing: Enhancing the social inclusion of people with hearing loss*. University of Canberra: Canberra. <http://www.betterhearing.org.au/wp-content/uploads/2015/04/A-Fairer-Hearing.pdf>

example, 16,500 successful workers' compensation claims between July 2002 and June 2007 for industrial deafness, which involved permanent impairment from noise<sup>6</sup>.

Given increasing life expectancy, it is likely that these personal, social and economic costs will increase over time unless action is taken to reduce the risk of hearing loss among the wider population.

Exposure to noise is a particular problem. While some hearing loss results from the ageing process there is a significant amount of hearing loss which is preventable. It has been estimated, for example, that 20 per cent of adult-onset hearing loss is caused by exposure to loud noise<sup>7</sup>.

Exposure to noise largely occurs primarily through workplace and recreational activities, which is often preventable. Farmers and farm workers, for example, have been found to have higher rates of hearing loss than the general population, in part, because of poor uptake of hearing protection<sup>8</sup>.

More should be done to address recreational and occupational noise-induced hearing loss. National Seniors believes that the public needs to be better educated about the long-term risks of exposure to recreational and occupational noise through innovative awareness campaigns.

National Seniors also recommend that workplace health and safety laws and guidance documents, such as the National Code of Practice for Noise Management and Protection of Hearing at Work<sup>9</sup>, be reviewed to ensure that they are effective in promoting best practice in reducing the risks of hearing damage in the workplace.

[Access to, and cost of services, which include hearing assessments, treatment and support, Auslan language services, and new hearing aid technology.](#)

Recommendation/s

**4. National Seniors recommends that the Commonwealth Government do more to ensure competition and price transparency in the market for hearing aids.**

National Seniors members have reported that the greatest barrier to accessing hearing services is cost. National Seniors members have indicated that they have not utilised hearing services, even though this would improve their quality of life. A recent survey of our members revealed, for example, that as many as 75 per cent had been deterred from buying hearing aids because of the cost.

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<sup>6</sup> Safe Work Australia 2010. *Op cit.*

<sup>7</sup> Safe Work Australia 2010. *Op cit.*

<sup>8</sup> Gates, D.M. and Jones, M.S. 2007. *A Pilot Study to Prevent Hearing Loss in Farmers*. Public Health Nursing, 24 6, pp. 547-553.

<sup>9</sup> Australian Government National Occupational Health and Safety Commission (NOHSC) 2009. *National Code of Practice for Noise Management and Protection of Hearing at Work*. 3rd Edition NOHSC: Canberra.

A growing proportion of older Australians are not eligible for free or subsidised hearing services through the Australian Government Hearing Services Program. Many do not have the means to afford the high cost charged for more advanced hearing aids, even if they have access to a government subsidy.

National Seniors members have also raised concerns about transparency in the sale of hearing aids. A lack of transparency about price is a big issue for older people. Older people can feel pressured to purchase more expensive hearing aids if an audiologist claims that the less expensive model is not adequate. Some of our members are concerned there is an emphasis on selling the product rather than assisting with hearing health.

*Our problem is not the [hearing] loss but more the audiologists available. There seem to be no standards in the industry and hearing aids are most[ly] overpriced. An audiologist actually admitted to me that it is salesmanship rather than actual tailoring of needs. I have found instances of this many times.*

National Seniors Member

Unfortunately, there is very little information publicly available to compare hearing aids independently of the advice given by an audiologist. Ideally, hearing assessments should occur separately from sales so that an individual can receive a hearing assessment and then take the audiogram result and shop around to find the best product and service.

There is also the issue of comparability, which is a consistent problem faced by consumers when purchasing consumer products. As with other consumer products there appears to be significant variation in product offerings, which can make it difficult for consumers to easily compare between them. This results in consumers having to rely on the recommendation made by an audiologist.

The key issue for older Australians is trust. Older people want to be assured that they can trust audiologists to provide them with a product that meets their needs at a reasonable price and not be sold overpriced products that do not improve hearing outcomes. National Seniors believes that greater competition and price transparency can help to achieve better outcomes for older people with hearing loss and that the Commonwealth Government should do more to encourage this.

**Current access, support and cost of hearing health care for vulnerable populations, including: culturally and linguistically diverse people, the elderly, Aboriginal and Torres Strait Islanders and people living in rural and regional areas.**

**Community Service Obligation (CSO)**

Recommendation/s

- 5. National Seniors recommends that free services continue to be provided to vulnerable groups through the CSO.**

Vulnerable populations receive free access to hearing services through the existing Community Service Obligation (CSO) component of the Australian Government Hearing Services Program. Services are provided free to<sup>10</sup>:

- All Aboriginal and Torres Strait Islander peoples aged over 50.
- Aboriginal and Torres Strait Islander peoples participating in the Remote Jobs and Communities Program
- An adult client who meets the Voucher program eligibility criteria and has a profound hearing loss or hearing loss and severe communication impairment
- A person who meets the Voucher program eligibility criteria, and lives in a remote area of Australia.

National Seniors believes that vulnerable Australians should have ongoing access to free hearing services through the CSO.

### Voucher system

Recommendation/s

- 6. National Seniors supports ongoing funding for the voucher system as a means to deliver subsidised hearing services to vulnerable people such as older Australians on low fixed incomes.**

Older Australians also have access to a voucher system of the Australian Government Hearing Services Program, which provides subsidised hearing services for other vulnerable groups. This includes Pensioner Concession Card holders, Department of Veterans' Affairs Gold and White Repatriation Health Card holders and recipients of a sickness allowance from Centrelink. Vouchers can be utilised through Australian Hearing or a government approved private audiology clinics. National Seniors supports ongoing funding for the voucher system as a means of facilitating access to hearing services for low-income seniors.

### Hearing aid banks

Recommendation/s

- 7. National Seniors recommends that a national hearing aid register be established to enable hearing aid users to register to donate their hearing aid when no longer required.**
- 8. National Seniors recommends that contracted hearing service providers be required to give information to clients about registering to donate their hearing aid when it is no longer required.**

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<sup>10</sup> Australian Hearing 2016. 'Who is eligible for Australian Hearing services?' Accessed online 16 December 2016. <https://www.hearing.com.au/eligible-australian-hearing-services/>

**9. National Seniors recommends that Commonwealth Government consider offering people who donate their hearing aids to a hearing aid bank some form of reimbursement as an inducement to donate unused hearing aids.**

Hearing services are also offered through hearing aid banks in many, but not all, states and territories. Hearing aid banks offer cost-effective hearing services to people ineligible for free or subsidised services offered through the Australian Government Hearing Services Program.

Eligibility rules for hearing aid banks are not consistent across the different jurisdictions but are primarily focused on those with low-incomes and those who require hearing services in order to access and maintain employment<sup>11</sup>.

Hearing aid banks are limited in the services they can offer, in a large part because there is a lack of supply of second hand hearing aids that can be reconditioned and resupplied to those who require them. Mechanisms are required to ensure a greater supply of hearing aids to hearing aid banks.

National Seniors believes that hearing aid bank services should be more readily available to older Australians. National Seniors receives regular enquiries from members interested in accessing services offered through a hearing aid bank model. Unfortunately, many find that either there is no hearing aid bank available in their home state or territory or that they are ineligible for these services.

### Means testing

**10. National Seniors recommends that the eligibility requirements for the Australian Government Hearing Services Program and hearing aid banks be extended to Commonwealth Seniors Health Card holders and Health Care Card holders aged under 65.**

National Seniors recommends that eligibility for free or subsidised hearing services be reviewed to ensure that people who do not have the means to pay are included in the Australian Government Hearing Services Program or eligible for services offered through Hearing Aid Banks.

National Seniors supports a needs and means testing approach to eligibility rules for free and subsidised hearing services. Unfortunately, the current approach does not capture all of those who might require access to services and might struggle with the cost of private audiology services.

Out-of-pocket-expenses present the greatest barrier for accessing hearing aids and cochlear implants for seniors ineligible for the Australian Government Hearing Services Program. National Seniors believes that eligibility for the voucher system should be expanded to include Commonwealth Seniors Health Card (CSHC) holders.

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<sup>11</sup> Australian Government Department of Health 2016. 'I'm not eligible- where else can I get help?' Accessed online 16 December 2016. <http://hearingservices.gov.au/wps/wcm/connect/0d3f53ab-c086-42a9-81e9-4fa8e219b5fd/I'm+not+eligible+where+else+can+I+get+help.pdf?MOD=AJPERES>

CSHC holders have access to subsidised PBS medications. Offering CSHC holders access to the Australian Government Hearing Services Program would be consistent with this approach. CSHC offers government with a suitable method to capture low-income self-funded retirees, who might otherwise struggle to meet the costs of hearing services through the private sector.

CSHC holders are also unlikely to be eligible for services offered through hearing aid banks. Eligibility for reconditioned hearing aids, provided through hearing aid banks, is generally offered to those on significantly low incomes and/or on the basis of requiring hearing aids to support ongoing workforce participation. In this regard, it is suitable for those approaching the age of eligibility for the Age Pension but not for those older Australians who are at the low-income end of the self-funded retiree population. Extending eligibility to CSHC holders would ensure that self-funded retirees on low fixed incomes are able to access this service.