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I appreciate having the opportunity of being able to present my perspective as a consumer, to the Advertising of Therapeutic Goods in Australia.

I will attempt to keep my submission short, sweet and to the point and will happily address any questions that you may have.

My particular concern is around the advertising of goods, devices and services that are considered to be in the domain of 'complementary and alternative medicines' (CAM) otherwise known as 'The Wellness Industry'.

In my particular case I became a user of homeopathy after a back injury and suffered chronic pain and sciatica as a result.

Having explored all the medical options available at the time I made the decision not to continue with anti inflammatory and pain killers, with their side effects, or risk surgery which had a low success rate.

Being in agony and desperate I explored the CAM option. This is a common story that I hear from many others with similar experiences.

I tried chiropractors, osteopaths, herbalists all with no improvement in my condition. I eventually went to a naturopath who prescribed massage, amended my diet and put me on a course of homeopathy.

In the course of time my back pain cleared up, seemingly miraculously, and I was hooked on homeopathy.

I had fallen for two of the minds greatest tricks, to mistake correlation for causation and confirmation bias, to over emphasise the things that fitted my expectations and to ignore those that didn't.

Whilst it took some years, doubt eventually seeped into my conviction and I began to question why homeopathy seemed to work only some of the time and eventually rejected the homeopaths pseudo scientific explanation for this.

As a consumer I can say that it is quite difficult, if not almost impossible, to locate unambiguous, honest, truthful information about CAM.

It is my experience that CAM practitioner's exhibit wilful ignorance of the reality of their practices and the CAM industry has in ingrained culture of unethical practices and deliberate deceit allowing mercantile interests to take precedence over their patient's health.

Sadly even Governments indulge in the same deceit. I provide as an example the information on homeopathy provided by the Victorian State Governments online 'Better Health Channel' called a 'Fact Sheet' (see attachment).

This 'fact sheet' is no more than a collection of implausible explanations using pseudo science and logical fallacies. It is claimed to be 'quality-assured current health information on the topic you have selected.' Its quality-assured rubbish!

<http://www.betterhealth.vic.gov.au/bhcv2/bhcarticles.nsf/pages/Homeopathy>

'Better Health' provides information covering a number of CAM topics with a similar degree of credulous inaccuracy.

I have submitted complaints regarding the information on the 'Better Health Channel' to both the Victorian Health Services Commissioner and the Minister for Health have attached their responses for your information.

As a consumer I feel angered and betrayed by the endemic lack of honesty in the CAM industry and the apparent absence of even the most basic level of consumer protection.

CAM is no longer harmless when it replaces medicine for the treatment cancer and other life threatening illnesses or as a replacement for vaccination as in the culpable fantasy of Homeoprophylaxis which is a treat to public health.

I am aware that a significant number of CAM practitioners flaunt TGA directives and continue to present untrue and misleading information with apparent impunity.

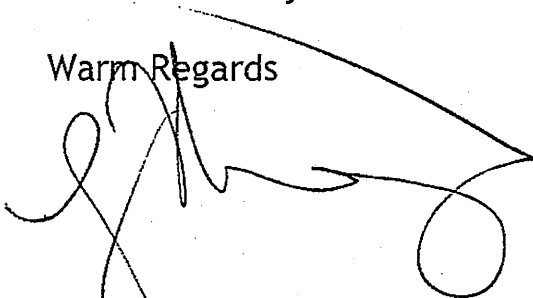
So far as the TGA's role in improving this situation I suggest;

1. That all CAM products that are unsupported by rigorous scientific evidence be clearly labelled as 'having no evidence of efficacy; however the user may experience a placebo effect in some cases'.
2. The TGA must be able to apply adequate sanctions in order to moderate the behaviour of the cowboys in order to establish a satisfactory level of consumer protection.
3. The TGA should also ensure Government instrumentalities provide consistently accurate information regarding CAM and to stop pandering to the Wellness Industry.

Without evidence of efficacy, CAM is no more than an indulged fantasy.

Thank You for your consideration of my comments.

Warm Regards

A handwritten signature in black ink, appearing to be 'Graeme Hanigan', written in a cursive style. The signature is positioned below the text 'Warm Regards' and above the printed name 'Graeme Hanigan'. A large, sweeping line from the signature extends upwards and to the right, crossing over the text 'Warm Regards'.

Graeme Hanigan

Homeopathy

Homeopathy (or homoeopathy) is a holistic system of medicine. It aims to stimulate a healing response to disease by administering specially prepared substances that mimic the symptoms of disease in healthy people. Homeopathy claims to treat the symptoms of a wide range of illnesses including allergies, asthma, eczema, hay fever, headaches, stress and respiratory infections.

It is important to tell your doctor if you are planning to start any new treatment, including homeopathy.

Helping the body to heal itself

The word 'homeopathy' (also known as homoeopathy) is derived from the Greek words *homoiōs* meaning 'similar' and *pathos* meaning 'suffering'. Homeopaths treat the person with specially prepared substances that mimic the symptoms of disease in healthy people. Homeopaths believe that this strengthens the ability of the body to heal itself.

Law of similars

The cornerstone of homeopathic philosophy is the 'Law of similars'. This law or principle is based on a long-held belief (by ancient healers like Paracelsus) that substances that produce symptoms in a healthy individual can be used to treat similar symptoms in a sick person. Modern homeopathy was founded in the 18th century by a German physician, Dr Samuel Hahnemann.

An example of this principle is coffee. Coffee can aggravate some people who are sensitive to its stimulating effects. These people may experience increased mental and physical alertness, along with an exaggerated response to stimuli. People who present at a homeopathic clinic with symptoms of insomnia, headache, irritability and an overstimulated nervous system may be prescribed a dose of *Coffea cruda*, which has been prepared according to homeopathic principles. Practitioners believe that this will settle the symptoms of insomnia in these people.

Treating the whole person

Homeopathy aims to treat the whole person, taking into account personality, lifestyle and hereditary factors as well as the history of the disease. Since all people are unique, homeopathic medicines are prescribed to treat individuals. For example, headaches are treated with different medicines according to the person's individual symptoms.

Homeopathy is not a replacement for conventional medical treatment of serious diseases or infections, but aims to help alleviate the symptoms of a wide range of chronic and acute illnesses including:

- Allergies
- Asthma
- Eczema
- Hay fever
- Headaches
- Respiratory infections
- Stress.

Homeopathic medicines are controlled by a government authority

Homeopathic medicines are made from a variety of sources, such as plants, animals and minerals. They are prepared according to strict guidelines set out in international pharmacopoeias and in Australia come under the control of the Therapeutic Goods Administration (TGA).

Many homeopathic preparations are exempt from the need to be in the Australian Register of Therapeutic Goods and some may be exempt from the TGA goods manufacturing practice (GMP) requirements. Homeopathic medicines are considered safe and free from serious adverse reactions.

Very small doses are used

The preparation of homeopathic medicines consists of repeated dilution and shaking called 'potentisation'. Homeopaths believe this process renders the remedies capable of stimulating the body's natural healing forces. After the 12th dilution, there is no discernible chemical trace of the original substance left in the medicine.

Scientists question how this highly diluted substance could retain a biological effect, but homeopaths believe the preparation retains the qualities of the original substance. Although a precise mechanism for how homeopathy works has not yet been scientifically established, there have been some studies that support the efficacy of homeopathy, while others have not been able to confirm its effectiveness for any specific medical condition.

Treatments and precautions

Homeopathic medicines can be in the form of liquid, granules, powder or tablets. Your practitioner might also advise general lifestyle and dietary changes as part of a treatment plan.

Sometimes symptoms may temporarily get worse before they get better. This 'aggravation' of symptoms can be part of the homeopathic treatment. However, you should tell your homeopath if you have these reactions. Your homeopath may refer you to a doctor or other healthcare practitioner if necessary.

Choose a qualified and registered practitioner.

If you want to use homeopathic treatment, you should consult a registered practitioner. In Australia, the Australian Register of Homoeopaths (AROH) is the independent national registration board for professional homeopaths. Practitioners registered with AROH are recognised by all the major health insurance funds for rebates on ancillary benefit tables.

Practitioners are registered according to government-endorsed standards that are outlined in the government's *Health Training Package (HLT07)*. This set of standards forms the basis of recognised professional training for homeopaths in Australia.

It is important to note that naturopaths are not homeopaths. Naturopathic training does not meet the government standards for homeopathy, although some naturopaths have undertaken additional studies to meet these requirements.

Tell your doctor or homeopath about your medications

You should tell your doctor if you are planning to start a course of homeopathic treatment for your condition. Never stop taking conventional drugs without the knowledge and approval of your doctor. You must also tell your homeopath what conventional drugs you are taking.

Homeopathic medicines are not vaccines

Immunisation is a medical term and refers to the process by which the body is stimulated to develop resistance to a variety of infections. Vaccines are made from germs and work by stimulating the body to form antibodies (specialised germ-fighting cells) to produce immunity. There is no such thing as a 'homeopathic vaccine'. Homeopathic medicines are not based on specific antibody or germ-fighting cell formation.

Homeopathy recognises a range of options for preventing disease and is often used in conjunction with conventional disease prevention measures such as immunisation. Registered homeopaths encourage their patients to exercise their right to make informed decisions on disease prevention and to seek advice based on balanced information gathered from a broad range of sources.

Where to get help

- Registered homeopathic practitioner
- Australian Homoeopathic Association www.homeopathyoz.org
- Australian Register of Homoeopaths Tel. 1300 360 043
- Your doctor

Things to remember

- Homeopathy is a holistic system of medicine based on the theory of treating 'like with like'.
- Homeopathy claims to stimulate healing responses to diseases by administering substances that mimic the symptoms of those diseases in healthy people.
- Symptoms are interpreted as a sign that the body is fighting against disease.
- Make sure you seek the services of a registered homeopath.

This page has been produced in consultation with, and approved by:

Australian Homoeopathic Association

This Better Health Channel fact sheet has passed through a rigorous approval process. The information provided was accurate at the time of publication and is not intended to take the place of medical advice. Please seek advice from a qualified health care professional.

For the latest updates and more information, visit www.betterhealth.vic.gov.au

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Mr Graeme Hanigan

Dear Mr Hanigan

Thank you for your email of 23 August 2009 regarding information on the Better Health Channel website. I value your comments and note your particular concerns about the information on homeopathic therapies. I also note that you have had further correspondence with the Better Health Channel on 27 August 2009 on this matter.

While I understand that many people have strong views about complementary and alternative medicine, the Department of Health recognises the need to acknowledge the community's interest in the full range of health and treatment options available to health consumers.

The Better Health Channel endeavours to provide appropriate information about complementary and alternative medicine, while cautioning consumers about unfounded claims and the critical importance of informed consent. The Better Health Channel does not promote these therapies as a replacement for conventional medicine or immunisation and urges individuals to seek advice from their doctor (registered medical practitioner) as appropriate.

I hope this addresses your concerns. If you require any further information, please contact the Better Health Channel on (03) 9096 2177.

Yours sincerely



HON DANIEL ANDREWS MP
MINISTER FOR HEALTH

HEALTH SERVICES COMMISSIONER

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October 15, 2009

Mr Graeme Hanigan

Dear Mr Hanigan,

Thank you for your letter outlining your concerns about the Better Health Channel's information on Homeopathy. I note you have already written to the Minister for Health about this and received a response explaining the purpose of information available on the Better Health Channel.

My office was established to provide a means of alternative dispute resolution for users and providers of health services in Victoria. As such, the Better Health Channel does not fall within my jurisdiction.

I also have a role in suggesting ways of improving the quality of health care services and I offer advice to the Department of Health on the content of some information on the Better Health Channel. I shall take your concerns into account when I do that. It is important however that people are given accurate information about whether treatments are evidence based or not. Benefits of any treatment should not be exaggerated and risks should be explained accurately. This then allows people to fully participate in making informed choices about the health care they choose.

Many people choose to use alternative and complementary therapies in managing their health and they have the right to do this. If a person who used such a therapy was unhappy with any aspect of the care provided they would have the right to complain to me to seek resolution.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Beth Wilson'. The signature is fluid and cursive, with a horizontal line at the end.

BETH WILSON
Health Services Commissioner