

[Redacted]

From: [Redacted]
Sent: Monday, 19 June 2017 9:39 AM
To: [Redacted]
Subject: FW: CMA - homoeopathic Australian market data [SEC=UNCLASSIFIED]
Attachments: CHC - Homoeopathic Market Information for TGA - 14 Nov 08.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Fyi, [Redacted] response to our request for marketing data for exempt homeopathic products in Australia.

[Redacted]

From: [Redacted]
Sent: Monday, 19 June 2017 8:29 AM
To: [Redacted]
Subject: CMA - homoeopathic Australian market data [SEC=No Protective Marking]

Dear [Redacted]

As discussed, CMA is pleased to provide the following summary of the homoeopathic medicines market in Australia to inform the development of an appropriate regulatory framework for this sector.

I have reached out in an attempt to see if there are refreshed data in this space but unfortunately it appears the 2008 CMA industry survey of the market is the closest we can get.

As we know, homoeopathic preparations that are more dilute than a 1,000 fold dilution of a mother tincture (4X and above) are not required to be on the ARTG as they are considered to be sufficiently low risk. That is, mother tinctures and 1X, 2X and 3X homoeopathic preparations must be included on the ARTG to be supplied in Australia.

The following information is a summary from a 2008 consultation and survey with industry.

"The CHC understands it is estimated about 50% of medicines currently supplied to practitioners are derived from substances referenced in the SUSDP; there are 301 substances listed in the 'NOT exempt' list with the potential for 10 to 20 'X' and 'C' potencies for each substance (more in some cases) which would equate to approximately 3000 to 6000 products on the Australian market being affected."

For your reference a copy of the full market data summary (2008) is included for your information. Please let me know if I can do anything further to assist.


Regards,

[Redacted]

[Redacted]
Complementary Medicines Australia
Natural Health and Wellness

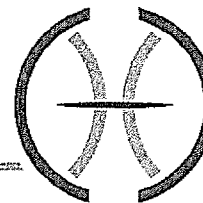
PO Box 450 Mawson ACT 2607 | Tel: [Redacted] | Website: www.cmaustralia.org.au



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Complementary Healthcare Council of Australia



[REDACTED]
 Director
 Pre Market Assessment Section
 Office of Complementary Medicines
 Therapeutic Goods Administration
 PO Box 100
 Canberra ACT 2606

Dear [REDACTED]

Re: Homoeopathic and Anthroposophic Medicine – Australian Market Information

The CHC is pleased to provide the following summary of the homoeopathic and anthroposophic medicines market in Australia to inform the development an appropriate regulatory framework for this medicine sector.

Australian Homoeopathic and Anthroposophic Market - Summary:

- o The CHC identified 34 companies who are Australian based suppliers/ manufacturers of homoeopathic and/or anthroposophic medicines to the Australian market.
- o A CHC market survey questionnaire was sent to all these companies in March and May 2008.
- o Approximately 44% of companies responded to the questionnaire and supplied data to the CHC. It should be noted that at least one significantly large homoeopathic company did not respond to the questionnaire.
- o The CHC estimates that size of the homoeopathic and anthroposophic medicines market to be **\$20+ million** based on data received and extrapolated for where data was not received.

From data received via the questionnaire:

- Total number of simplexes and combination homoeopathic/anthroposophic products on the Australian market – **3873 products**.
- Total number of units sold within the last 12 months – **1,278,416 units**.
- Total turnover within the last 12 months – **\$12,015,185**.

Further information relating to those companies that did not respond to the questionnaire (sourced from information publicly available):

- Total number of simplexes* and combination homoeopathic/anthroposophic products on the Australian market – at least **56,366**.

(Please note that this is an estimate based on internet search only and that not all product information was obtainable from all non-responding identified companies).

* Total count of simplexes includes different potencies and dosage forms available eg one simplex may have up to 10 potencies and 3 dosage forms.

Homoeopathic practitioner only product information:

- o From data received via the questionnaire:
 - Approximately 275 combination homoeopathic products and 3,339 simplex homoeopathic products were supplied directly to a practitioner within the last 12

- months. (Some of these products have multiple potencies i.e. 6C, 12C, 15C and 30C and several dosage forms for the same homoeopathic mixture).
- Individual products supplied to practitioners have been on the market between 1 to 30 years.
- From the data received, 282,386 units were sold within the last 12 months.
- From the data received, \$3,683,720 worth of products was sold to practitioners within the last 12 months.
- Information relating to those companies that did not respond to the questionnaire (sourced from information publicly available):
 - Limited information regarding simplexes supplied to practitioners was received by the CHC – further research by CHC staff however indicates that there are approximately **40,000 to 50,000 simplexes** available on the Australian market; these have not been accounted for in the summary of data received through the questionnaire.

Homoeopathic retail product information:

- From data received via the questionnaire:
 - Approximately 141 simplexes and combination homoeopathic products are currently sold over-the-counter in Australia (information relating to number of units sold and sales data was only received for 94% of these products).
 - Individual products being sold over-the-counter have been on the market ranged between 2 to 10 years.
 - From the data received, 969,630 units were sold within the last 12 months.
 - From the data received \$8,099,892 worth of products was sold within the last 12 months.

Anthroposophic product information:

- Approximately 2,088 anthroposophic products were supplied directly to a practitioner or over-the-counter within the last 12 months.
- The information received for these products does not indicate how long they have been available on the Australian market.
- From the data received, 5,115 units were sold directly to practitioners within the last 12 months.
- From the data received, 21,285 units were sold over-the-counter within the last 12 months.
- From the data received, \$231,573 worth of anthroposophic products was sold directly to practitioners or over-the-counter within the last 12 months (\$64,083 practitioners, \$167,494 over-the-counter).

Additional information:

- In the context of practitioner only supplied homoeopathic/anthroposophic medicines:

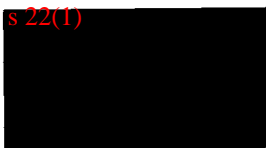
It should be noted that there are many practitioner supplied products that have a very low turnover of units sold i.e. 1 to 6 units sold within the last 12 months. If practitioner supplied products are required to be Listed (under the new proposed regulations) it will have a significant impact on the availability of these medicines as it will not be economically viable to supply them. For example, the current listing Application fee for a product is \$560, many single products sell from between \$11-\$30 and there may only be a few units sold.

- Those products that contain homoeopathic ingredients but are not considered to be homoeopathic products (i.e. herbal combination with a single homoeopathic ingredient) have not been assessed and included in this data summary. There may be a significant number of products on the Australian market that contain one or more homoeopathic ingredient(s).

- o Also not captured in the above summary are products supplied into Australia directly from overseas (such companies were not approached by the CHC to provide information via the questionnaire). For example, the CHC is aware of one NZ company that markets to Australia via orders placed directly in NZ; this company advertises 5,000+ homoeopathic products

Please do not hesitate to contact me if you require any further information or require to clarify any of the above.

Yours sincerely

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Technical Director

14 November 2008