

## Consultation: Options for the future regulation of 'low risk' products (Homeopathy)

In response to the TGA Consultation: Options for the future regulation of 'low risk' products, I have serious concerns about Option 4 being implemented for any sort of regulation or non-regulation of homeopathy.

I foresee, with the TGA's seeming preference for negative but flawed reports on the efficacy and benefits of homeopathy, one of which is currently before an Ombudsman for complaints of gross bias and irregularities, and the other already rejected by the UK Parliament, that the adoption of Option 4 will likely to lead to statements and claims about homeopathy, even traditional ones, no longer being permitted. If this were to happen, it would potentially have far-reaching implications for current stakeholders, some of whom are listed below.

1. **Consumers and users:** If Option 4 were to be implemented, it would no longer be possible for someone to provide a consumer or user of homeopathy with self-help information about homeopathic remedies for various health complaints. It would also be potentially illegal for a homeopath to prescribe a remedy for a user or consumer. Health care choice should remain in the hands of consumers, especially products such as homeopathics have an impeccable safety record in the hands of consumers and homeopathic practitioners alike.
2. **Homeopaths:** The legal implications for practitioners of Option 4 is unclear but as homeopathy would no longer be recognised as a therapeutic good, the practice of homeopathy may become illegal. A door would also be opened for those antagonistic to homeopathy to file complaints with the Australian Competition and Consumer Commission (ACCC) against any homeopath for prescribing a "non-therapeutic good".
3. **Homeopathic manufacturers and pharmacies:** The likely demise of the manufacturing and pharmaceutical sector under flow-on effects of Option 4 would effectively restrict community and practitioner access to homeopathic remedies which have and excellent safety record.

Option 4 in the regulation of homeopathy is obviously unsatisfactory from a number of perspectives. I urge the TGA to go back to the drawing board regarding it, look beyond the flawed reports to which it currently refers, and consult with genuine experts in the field regarding the true evidence base for homeopathy. I am happy to provide valid government-accepted reports and research papers to the TGA should it choose to look at them.