

My submission is to promote Option 1 – To keep homoeopathy regulated the way it is.

I have listed below several points regarding this for your consideration:

1. Homoeopathic remedies are the 'tools of my trade'. I have been using them for 35 years in my business with great efficacy. To possibly list homoeopathic remedies as non-therapeutic goods, could potentially and seriously affect my profession and my livelihood. Further, I feel this would critically damage the whole Australian industry which manufactures and distributes homoeopathic remedies.

I achieved my Diploma in Naturopathy in 1982 and my Graduate Diploma in Homoeopathy in 1990. Both were self-funded.

2. Homoeopathic medicine is a traditional medicine used worldwide and recognised by the World Health Organisation.

Ref:

[http://www.who.int/bulletin/archives/77\(2\)160.pdf](http://www.who.int/bulletin/archives/77(2)160.pdf)

Homoeopathy is 200 years old and is one of the most widespread non-conventional approaches to treatment known to the world, along with traditional Chinese medicine, herbal medicine and osteopathy. Homoeopathy forms part of our overall common heritage because of its low costs, because prescriptions are safe so long as they form part of a diagnostic approach, and because of the simple technology employed in its preparation, albeit requiring high levels of experience and knowledge. If homoeopathy works, with its triple focus on medication, prescription method and approach to the illness and the patient, it is an inherited good that belongs to all of us equally: the patients who take the medication, the physicians who prescribe it, the pharmaceutical laboratories that manufacture it, the pharmaceutical outlets that issue it, the scientists who are trying to evaluate it, and the health systems that attempt to regulate the costs, advantages and risks of such activities. To argue for an improvement in the relations between homoeopathic agencies and Western health systems, chiefly by developing education, training and evaluation, is therefore not illusory or idealistic, but the statement of a complex reality which makes cooperation indispensable.

Ref:

<http://www.karger.com/article/Abstract/93586>

Many high-quality investigations of pre-clinical basic research proved homeopathic high-potencies inducing regulative and specific changes in

cells or living organisms. 20 of 22 systematic reviews detected at least a trend in favor of homeopathy. In our estimation 5 studies yielded results indicating clear evidence for homeopathic therapy. The evaluation of 29 studies in the domain 'Upper Respiratory Tract Infections/Allergic Reactions' showed a positive overall result in favor of homeopathy. 6 out of 7 controlled studies were at least equivalent to conventional medical interventions. 8 out of 16 placebocontrolled studies were significant in favor of homeopathy. Swiss regulations grant a high degree of safety due to product and training requirements for homeopathic physicians. Applied properly, classical homeopathy has few side-effects and the use of high-potencies is free of toxic effects.

3. I feel, that on looking at the NHMRC's report, their findings seem to be biased. This report is currently under review by the Ombudsman.

Please refer to the attached link below with further pdf link on website titled: 'Open letter from AHA to NHMRC'. This letter addresses concerns by the Australian Homoeopathic Association regarding the findings of NHMRC and the way in which the trials were conducted.

Ref:

http://www.homeopathyoz.org/images/news/Open_response_letter_by_AHA_to_NHMRC.pdf

4. The NHMRC has set a higher standard for homoeopathy than is required by the TGA for any other modality.

5. The UK review on homoeopathy, which was cited, was rejected by the UK government.

6. A Swiss report on homoeopathy states that homoeopathy is effective and economical, yet this was not mentioned. Please note the below statement in the 'Conclusion' of article 'Swiss Federal Government report supports homeopathy claims' and further I have attached a link for your reference.

'This authoritative report has informed the decision taken by the Swiss government to include homeopathy (and four other CAM therapies) on the list of services covered by the Swiss statutory health insurance scheme until 2017. We would hope that health authorities in the UK and elsewhere will consider the recommendations of this report when reviewing the role

homeopathy has to play in statutory healthcare.' – Article in link on referenced page below
'HRI Spring 2012 research article'

Ref: <https://www.hri-research.org/resources/homeopathy-the-debate/the-swiss-hta-report-on-homeopathy/>