

## **Consultation on "Low-Risk Products"**

TGA Consultation on Homoeopathics:

Homeopathic Medicine is a Traditional medicine used worldwide recognized by World Health Organisation and therefore is recognized as therapeutic worldwide. Under **no circumstances should Homeopathy be removed as a therapeutic option**. The TGA has the ability and discretion to recognize Traditional forms of medicine and not just evidence based therefore it should continue to do so in the case of Homeopathy.

The NHMRC report is subject to a complaint to the Ombudsman and therefore should **not** have been cited in this consultation paper. The UK government review cited in consultation paper was rejected by the UK Govt. and therefore should **not** have been mentioned to imply validity to its unaccepted conclusion.

A Swiss Report on Homeopathy stated "There is sufficient evidence for the preclinical effectiveness and the clinical efficacy of homeopathy and for its safety and economy compared with conventional treatment." –This **must be included** in the recommendations to give perspective and balance.

### **Option 4:**

Homoeopathic medicines are therapeutic goods and it is imperative to recognize the use and continued endorsement of Homeopathy by governments worldwide. The act of wanting to declare Homoeopathic medicines not therapeutic is unsubstantiated. This does not recognise the regulatory frameworks worldwide.

How can it turn its back on a medicine that could save millions of government and tax payer's money? **Who is misleading the Government and the TGA Consultation on Homoeopathics?** Homoeopathic medicine can be used in rural communities to treat the aborigines, mentally and physically, with minimum cost and effective results. It can be used to treat drug addicts, homeless, animals and even plants with minimum cost and effective results. It is an extremely diverse medicine with unbelievable positive outcomes. Homoeopathy is **a medicine to improve the quality of life, to assist people to stay out of hospital and the medical system.**

**Homoeopathic medicine is the answer for any Political Party in gaining money for the Budget and gaining votes** because of the results better health, it would reduce the strain on the

hospitals and Drs, and work collaboratively with conventional treatment. Homoeopathy is a medicine that can be used with any other medicine and not impede any actions of treatment but enhance the quality of the patient's life. Homoeopathy is a medicine that requires professional skills and education to administer it as is a holistic treatment and there are many considerations to apply to a prescription.

Australia's ACSS Consortium regulatory partner, Switzerland, acknowledges homeopathy with the same status as conventional medicine, regarding Health Insurance. This has been overlooked and a need to research positive research papers inclusive of the Swiss Health Technology Assessment.

The TGA consultation paper also makes the incorrect statement that homeopathy is 'not evidence based'. Trials were conducted and reviewed at the conclusion of 2014.

**The results are as follows:**

189 randomised controlled trials of homeopathy on 100 different medical conditions had been published in peer-reviewed journals<sup>1</sup>. Of these, 104 papers were placebo-controlled and were eligible for detailed review ([Homeopathy Research Institute \(HRI\)](#)):

**189 RCTs of homeopathy (end of 2014)**

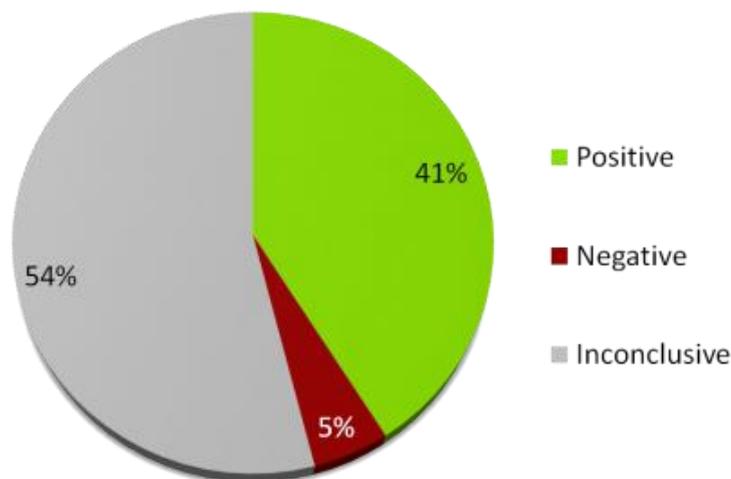


Chart A

How does this compare with evidence for conventional medicine?

## 1016 systematic reviews of RCTs of conventional medicine

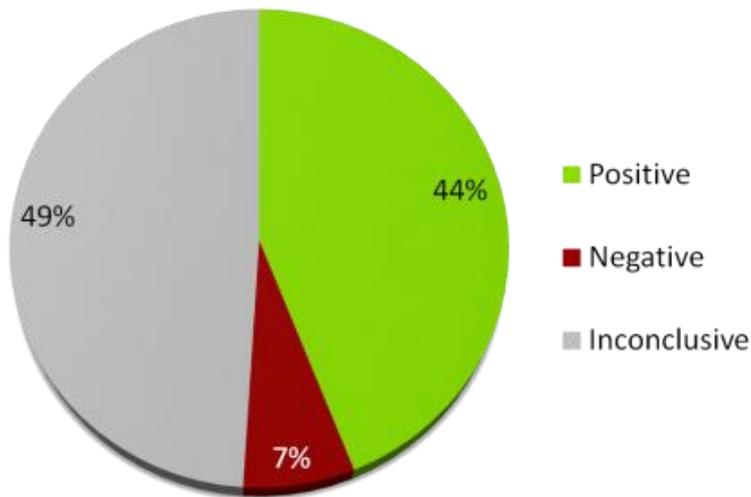


Chart B

An analysis of 1016 systematic reviews of RCTs of conventional medicine had similar findings<sup>2</sup>:

The results are similar for both homoeopathic and conventional medicine, however the difference is in the number of trials conducted, which is indicative of where the most funding is allocated ([Homeopathy Research Institute \(HRI\)](#)).

In conclusion Homoeopathic medicines are therapeutic and there is evidence. Prof Luc Montagnier, who won a Nobel Prize in 2008 for his role in discovering HIV, says *“They (homoeopathic medicines) are water structures which mimic the original molecules.”* This concludes that homoeopathic medicines do have biological effects and therefore can be used therapeutically.