



## **Submission to the TGA regarding homeopathy, vitamins and minerals.**

### **Regarding Homeopathy**

I would like to confidentially register my submission to select **Option 1: Keep homeopathy regulated the way it is.**

For the following points and reasons.

1. Homeopathics are widely available to purchase over the counter in Australia and are available in pharmacies and health food stores as they are in other parts of the world like France. They are accepted as a product to purchase here.
2. Homeopathics are some of the least harmful methods of supplementation that can be provided.
3. Qualified Homeopaths have at the very least a diploma in homeopathy and many have extensive experience and further training in clinic and in the field.
4. The recent 2015 NHMRC report was extremely flawed and is biased in its conclusions in homeopathy for many reasons including the exclusion of all evidence for homeopathy that was not from English speaking countries.
5. There needs to be adequate consideration and respect given to people to choose the modalities they wish to utilize for their own health.
6. There have been many studies that prove the efficiency of homeopathics in clinical trials however holistic therapies and results need to be understood as occurring based on the whole system. This means that at times studies comparing one homeopathic for one person may vary when assessed and a different homeopathic is needed for application for another individual. This is obviously undertaken under the hands of qualified homeopaths.

**I do not believe option 2 should be considered due to the following reasons- (Option 2 – Keep it the way it is but require scientific evidence for high level claims.)**

1. The 2015 NHMRC report was biased and inaccurate, excluding important data and research done by countries that did not have English as their first language (translations were also not used).
2. For the same reason highlighted in number 6 for pro Option 1, homeopathics vary from person to person and condition to condition. It is not a field where there is a

one remedy fits all individuals approach as all aspects of the individual are considered when a homeopath supplies a remedy to an individual.

3. Many natural health modalities do not fit within the scientific based hierarchy system yet still provide results. They either do not fit the hierarchy due to change of remedies as per individuals or due to multiple supplementations being given at the same time (for different or combined reasons) that lead to improvements within that individual.

**It is in my opinion inappropriate to apply Option 3 (Exempt homeopathy from listing) and Option 4 (Declare homeopathic products NOT to be therapeutic goods)**

For the following reasons-

1. This is a direct violation of human rights to choose their own modalities for health and wellbeing.
2. It is unfair on those who have completed qualifications to be homeopaths within their own right and unfair on those completing studies in homeopathy diplomas (some of which have Government backing and FEE help structure) that are currently in teach out mode. The TGA and Government bodies should consider the repercussions of such decisions on individuals which could include but not be limited to homeopaths seeking reimbursement for money paid to institutions and lawsuits.
3. These two options would potentially restrict the manufacturing, purchasing and sale of homeopathics to people who want them.
4. The Swiss Homeopathy in Healthcare Report has not been taken into consideration by the TGA.
5. The NHMRC's report on Homeopathy was extremely biased, inaccurate and left out lots of data from countries that did not have English as their first language (translations were also not used). It is my understanding that the irregularities in this report have also led to the Ombudsman reviewing it.
6. The UK Science and Technology Report that has been preferred by the TGA was rejected by UK Parliament.

I believe if there needs to be adjustments to the access of homeopathics it could well be attained by TGA and Government support of practitioner only remedies and tighter regulations on over the counter products, or at least having a qualified homeopath on site to assist the purchase of particular remedies.

## **In regards to the regulation of Vitamins and Minerals**

I would like to register my submission to select **Option 1: Keep Vitamins and minerals regulated the way they are.**

For the following points and reasons.

1. Vitamins and minerals are widely available to purchase over the counter in Australia and are available in pharmacies and health food stores as they are in other parts of the world. They are accepted as products to purchase here.
2. Under the correct guidance vitamins and minerals can be very beneficial methods of supplementation.
3. Qualified Naturopaths have extensive training and modules on vitamins and minerals in their diplomas and degrees. They also have experience and further training in clinic and in the field to guide supplementation of vitamins and minerals.
4. There needs to be adequate consideration and respect given to people to choose who wish to choose vitamins and minerals for their own health needs.
5. There have been many studies that prove the efficiency of vitamins and minerals in clinical trials however holistic therapies and results need to be understood as occurring based on the whole system. This means that at times studies comparing one application for one person may vary when assessed and a different vitamin or mineral approach is needed for application for another individual. This is obviously undertaken under the hands of qualified nutritionalists, naturopaths and health professionals.
6. Consideration to the effect this will have on qualified individuals such as Naturopaths, Nutritionalists and other health practitioners and those studying within these fields. Whether these effects be of financial loss, career change or impeding of further health protocols for their clients.

The following considerations could be made to ensure public safety-

1. Support of practitioner only supplementation
2. Additional support to practitioners (Nutritionalists, naturopaths) to encourage them to use and support high quality supplements
3. Tighter over the counter regulations of supplements, so that experienced professionals are overseeing their use.
4. Tighter regulations on imported vitamins and minerals from such sources as "iherb.com" to ensure the general public is getting higher standard products and safer more efficient products.
5. Stronger labelling on vitamins and minerals to show exactly what is in each bottle of product.