

12th May 2017

RE: TGA Consultation on Low Risk Products (Homeopathy)

Dear Sir or Madam,

I am extremely concerned with the regulation changes that are being considered by the TGA relating to removing Homeopathics as a therapeutic good.

To state that Homeopathy is 'not evidenced based' is false. There are multiple positive research studies on the effectiveness of Homeopathy available, many of which can be viewed on the Homeopathic Research Institute website https://www.hri-research.org/ including a Swiss Health Technology Assessment Report on Homeopathy which 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 month, May 2017 Switzerland is giving Homeopathy the same status as conventional medicine when it comes to health insurance.

Homeopathic Medicine is a Traditional medicine used worldwide recognized by World Health Organisation. On that basis alone it should be recognized as a therapeutic option. 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.

TGA's role is to protect public safety, not make value judgments about products Australians freely choose to use as therapeutic goods.

The Consultation paper refers to the NHMRC Homeopathy Review, which is subject to a complaint to the Ombudsman and therefore should not have been cited in this consultation paper.

The NHMRC report set a higher standard to Homeopathy than the TGA currently use to assess efficacy and will use in the future to assess efficacy and therefore should not have been mentioned in this consultation paper as it is misleading and not relevant.

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.

In relation to the options suggested in this consultation paper in relation to Homeopathic products, I support Option 1 "Maintain the status quo regulation of homeopathic products" and oppose the remaining three options 2, 3, & 4.

Homeopathic preparations have been used safely for over 200 hundred years and the public should continue to have easy access to these products and form of healthcare.

Yours Sincerely,