

May 12, 2017

Dear Panel

This submission pertains to the future regulations of “low risk options” for homeopathic products, particularly in regards to recommendation Forty Eight.

“Recommendation Forty-Eight: The Panel recommends that the Australian Government undertakes a review of the range of complementary medicinal products, currently listed in the ARTG and subject to regulation under the medicines framework, with a view to ensuring that products that might best be regulated under other regulatory frameworks, without undermining public health and safety, are removed from the auspices of the Act.

In making these recommendations, the expert panel expressed the concern that “there are a range of products listed in the ARTG that are subject to a level of regulation which is not commensurate with the risk posed by these products to Australian consumers”.

Despite the claims that homeopathic products contain diluted toxic active ingredients to safe levels, we have seen that this may not always be the case. The links to the death of 10 deaths and 400 babies due to Hyland’s teething gel and the slow process in seeing the voluntary recall in Australia demonstrates that any product including substances as toxic as belladonna need to be regulated. Teething products would not ordinarily qualify as a serious therapeutic claim, but with the inclusion of deadly ingredients, the need for regulation is obvious.

<http://www.smh.com.au/national/hylands-homeopathic-baby-tablets-recalled-in-australia-over-safety-fears-20170429-gvvfgx.html>

It is essential that the TGA adopt option 2 for homeopathic products in order to appropriately inform the public of the lack of scientific evidence for the products. Relegating as homeopathic treatments to non therapeutic goods as would happen with option 4 defies the term “remedy” which is what the products are touted to be. This could only work if homeopathic products were clearly and conspicuously labelled “non therapeutic” which then makes them redundant or allows for the unscrupulous to make the “science doesn’t know everything and we don’t know why homeopathy works, but it does” type of current testimonials to continue.

Consumers buy homeopathic products in good faith that they actually work as purported, yet the recent review by the NHMRC clearly concludes that there is no scientific evidence that homeopathy is shown to work.

<http://www.news.com.au/lifestyle/health/health-problems/national-health-and-medical-research-council-says-homoeopathy-doesnt-work-and-patients-are-putting-their-health-at-risk/news-story/285c1be7ad6cda98883b899e2bf2846a>

In recent visits to pharmacies in my local area, I was alarmed that homeopathic remedies are packaged similarly to evidenced based medicines and sit alongside them on the shelves. There is no way average consumers can be expected to discern effectively between products when they are legitimised by being sold in pharmacies and integrated in this way. Clear labelling that there is no scientific evidence for the homeopathic products is essential to inform consumers. Homeopathic products may not usually be toxic, however, if a person believes that they have efficacy, they may avoid seeking evidenced based treatments and appropriate medical help.

[REDACTED]