

11th May 2017

TO WHOM IT MAY CONCERN

In response to the consultation by the TGA in regards to Homeopathic Treatment, I am totally opposed to "options 3 and 4", particularly option 4, as it intends to declare homeopathic products NOT to be therapeutic goods.

I can honestly say that in my family, I have seen the benefits of Homeopathy Treatments on my then 6 year old Grand-daughter, when her friend contracted Whooping Cough, was treated by her Doctor then contracted it again immediately, unknowingly she exposed my Grand-daughter to the infection and after homeopathic treatment, was well with a few days, with no negative reaction.

Only at age 4, the day prior to leaving Australia for the UK, did require to have anti-biotic treatment for bi-lateral ear infection, otherwise she would not have been able to fly. This is the only time she has been required to have medical intervention, as my daughter uses Homeopathy on her as required, with amazing results.

Homeopathy is a big part of my family's health, as it is not only effective in treating presenting issues, it is also extremely safe. Even though my husband is a retired Medical Doctor, my daughter and I don't like resorting to medications, which all have known side effects, despite being approved by the TGA, when instead we can rely on Homeopathics. Therefore it makes no sense to me why the TGA would consider changing the classification and regulation of Homeopathics, when the role of the TGA is to protect our safety in relation to medicines and treatment, not to restrict the access to safe medicines.

Every drug regulating authority around the world, including the TGA, considers homeopathic remedies to be "low-risk" medicines and there seems no reason for that position to change now.

As a consumer of homeopathy products I do not want:

- Self-help information about homeopathy and the symptoms and ailments it treats, restricted.
- Homeopathic prescribers to be stopped from providing that information, or prescribing homeopathic remedies.
- Regulations designed for "high-risk" medicines applied to homeopathy which, by the TGA's own description, is a "low-risk" medicine.
- Consumer and user access to homeopathic remedies restricted.
- Changes to the regulations that would inhibit, restrict, or deny the importation, exportation, or manufacture of homeopathic remedies by homeopathic manufacturers and pharmacies.
- Changes to the current regulations that would either encourage or make it easier for those antagonistic to homeopathy to lodge vexatious complaints.

Homeopathy is recognised by the World Health Organisation (WHO), as the most popular and widely used complementary medicine worldwide. Entire communities depend on it for healthcare and the prevention of epidemic disease. That being so, why would the TGA consider restricting the access of Australians to it?

The Swiss Report on Homeopathy says, "There is sufficient evidence for the preclinical effectiveness in clinical efficacy of homeopathy and for its safety and economy compared with conventional treatment." That being the case why did the TGA exclude this favourable report from its consultation paper yet refer to two negative reports, one of which is currently before an Australian ombudsman for bias and irregularities, and the other, already rejected by the UK Parliament?

Why does the TGA draw from the NHMRC report when it is being investigated for complaints of serious irregularities, some of which include:

- Conflicts of interest,
- Bias and absence of fairness,
- The withholding of important information and commentary from the Australian public, and

• The expectation that homeopathy should meet a much higher standard of evidence than that set for other therapies or medicines – conventional or complementary?

Why would the TGA consider removing the access of Australians to homeopathic information and products when, based on the evidence, the TGA's Swiss counterpart has given homeopathy the same status as conventional medicine in regard to health insurance?

In referring to the flawed NHMRC report, the TGA says regulating homeopathic products as part of evidence-based medicine will be an "issue". The inference is that the NHMRC report is correct and there is no evidence supporting homeopathy. A significant and growing body of evidence is available for those prepared to look. [See the Homeopathic Research Institute as one source] Why does the TGA ignore this in favour of flawed reports?

Millions of people worldwide acknowledge the benefits of homeopathy. It would not be growing at the rate it is if it didn't work.

Unlike prescription drugs which "contribute to 330 of the state's 420 overdose deaths in 2015" in Victoria alone, there is no evidence to suggest that homeopathics have harmed or contributed to the death of anyone.

(http://www.abc.net.au/news/2016-04-05/pharmaceutical-drugs-in-nearly-80pc-of-victorian-overdose-deaths/7300036). Homeopathy should not be restricted by regulations used by "high-risk" drugs.

By not recognising homeopathy remedies as therapeutic goods in Option 4 of the consultation, the TGA will be out of step with other governments, worldwide, who do.

Everything in life is a choice and as Australians we should have the fundamental right to choose and access Homeopathics, as we so wish. The TGA's role is to ensure that the products and treatments available to Australians are safe for use. It is not to arbitrarily decide what the Australian public can and can't use especially when safety, as with homeopathy, is not an issue. Australians have the basic right to choose treatments which best suit them. Government agencies should not regulate to restrict their access to information about that treatment.

Option 4 threatens the very practice of homeopathy. Will student HECS debt be repaid by government if they can no longer work in the area of their training?

Fundamentally the issue raised is that Homeopathy is "low risk" and to many Australians it is very effective and there is no reason to make any changes to the current TGA regulation around Homeopathy.

It concerns me greatly that the TGA would consider deregulating Homeopathic products as it approves "high risk" and dangerous medicines, which must be highly regulated, so Homeopathics should be kept available to those that choose to use it.

I recently watched and have purchased all the information on "The Truth About Vaccines", which highlights the total lack of research into the devastating effects of some of these so-called "harmless" vaccination schedules. It proved to me as the mother of a 31 year old son who I now realise, was vaccine damaged. He is on the Autistic Spectrum, ADHD, plus various other co-morbid disorders, including dyslexia. He has for many years gradually improved with the use of "natural therapies", including homeopathy, vitamins and supplements, including Brahmi to assist in memory and Omega 3 fish oil capsules.

There is a growing body of concern world-wide against the use of the chemical agents which are used in Vaccines to bond them together, not just the actual live or dead infections used to prevent infection. These chemicals include Thimerasole, which is a strong form of Mercury, Aluminium which causes brain damage and Formaldahide which used by taxidermists to stuff and preserve dead animals. All of these chemicals used are able to transfer through the Brain Barrier and this is what causes the increasing and devastating side effects on newborn and young babies and children.

I believe that, as the people who know about the lack of Research into the use of Vaccines have shown, that one of the main treatments in response to healing these children from their "living death" is Homeopathy. This is the recognised treatment along with herbs, vitamins, supplements and good nutrition in bringing back some quality of life to those children and adults.

Has the TGA been lobbied by the huge pharmaceutical companies who make billions on the misery of children and their families with their toxic chemicals? Big Pharma does not allow anyone to speak out against the lack of research and transparency in "Vaccinations". Instead they stigmatise them as Anti-Vaxers. I am not an Anti-Vaxer, I am pro-choice in allowing parents of healthy children being allowed to make these medical choices for themselves. Malcolm Turnbull, the Prime Minister of Australia is married to a woman who heads one the Big Pharma companies in Australia, this does make one suspect that some kind of "conflict of interest" arises when he is so intent of becoming like a small part of the United States of America, where Vaccines are compulsory and where as in this country, no Pharmaceutical company can be sued for the vaccine damage caused by their vaccines. Where is the TGA on this here in Australia.

If, as I understand it, Homeopathy Treatment for the effects of this compulsory legislation is allowed to be "banned" here in Australia, where do parents and families go to prevent, maintain and cure their children from a so-called "harmless Vaccine Schedule"?

As has been stated by the TGA, Homeopathy is a "low-risk" treatment, therefore, why remove it from the people who use it. It should be freely available for anyone who wishes to choose it and find it beneficial as I do.

Australians have a right to choose whatever legal means are available to them in order to maintain their health and wellbeing.

Option 4 must not go through as it removes the rights of Australians in the Health Choices.