

Consultation: Options for the future regulation of 'low risk products'

I am responding to the above consultation regarding low risk products.

My response is to the points laid out on Page 47-49 regarding Homeopathic products.

Homeopathy history and use around the world

Homeopathy is a traditional medicine that has been established for over 220 years. The medicines used 200 years ago are still in use today because they have proven to work and are safe, natural and highly effective.

Worldwide, over 200 million people use homeopathy on a regular basis.^{1 2}

Homeopathy is recognized by the World Health Organization.

Homeopathy is included in the national health systems of a number of countries e.g. Brazil, Chile, India, Mexico, Pakistan, Switzerland, United Kingdom.

India leads in terms of number of people using homeopathy, with 100 million people depending solely on homeopathy for their medical care.¹ There are over 200,000 registered homeopathic doctors currently, with approximately 12,000 more being added every year.³

Options for discussion

Option 1 - I am in support of this option

I do not agree with your supporting claim "that there is no reliable evidence that homeopathy is effective." This is based on the NHMRC report which has now been referred to the Commonwealth Ombudsman due to it being inaccurate, highly misleading to the public and unjustly damaging to the credibility of the Homeopathy sector. Are the TGA relying on a NHMRC report that has procedural and research flaws, reporting accuracies and conflicts of interest?

With regard to "products under the same framework as evidence based medicine is that it may imply government endorsement" The TGA are concerned about

this implied endorsement, however the general public (that buy these products) have no idea about these classifications. The TGA's job is to 'protect the public safety' not be concerned with such non issues. The TGA has not provided any research to suggest that ARTG listed complementary medicines have increased credibility for being listed.

Citing one paragraph from the U.K. government review which was actually a **UK House of Commons Review (not government)** that sounds like it was in favour of not wanting to endorse Homeopathy..... well it was rejected! Quoting out of context is very misleading.

Option 2

I do not agree with this option.

The potential impact to public health by changing the classification of Homeopathic products could possibly result in the general public having less choice with their healthcare options. When traditional medicines have been successfully used for over 200 years there ought to be consideration of the fact that many smaller companies are unable to fund expensive scientific research but their medicines are no less of value than current convention medicines.

Where would the TGA draw this line of what is acceptable evidence and what isn't?

Option 3

I do not agree, the system is working as is, why change the status quo.

Option 4

I totally reject this one. This option has no sound basis.

Conclusion

While other countries are combining Homeopathy into their healthcare system, (as its cheap, safe and highly effective) Australia is reversing back into the dark ages!!!!

1. Prasad R. Homoeopathy booming in India. *Lancet*, 2007; **370**:1679-80 | [Full Text](#)
2. Homeopathic medicinal products. Commission report to the European Parliament and the Council on the application of Directives 92/73 and 92/74 | [Full Text](#)
3. Ghosh AK. A short history of the development of homeopathy in India. *Homeopathy*, 2010;**99**(2):130-6 | [PubMed](#)