Comments on Options for Future Regulation of "Low Risk Products" - Homeopathic Products by [redacted]

I SUPPORT Option 1 or 2.

I DO NOT SUPPORT Options 3 and 4.

Homeopathic products should be considered 'low risk products'.

Comments:

Homeopathy worldwide

Why would the TGA consider restricting Australian's access to Homeopathic products and services, when it is recognised by the World Health Organization (WHO) as the most popular and widely used complementary medicine worldwide.

http://www.who.int/bulletin/archives/77(2)160.pdf;
http://www.who.int/medicines/areas/traditional/Homeopathy.pdf

A Swiss Report, *Homeopathy in Healthcare: Effectiveness, Appropriateness, Safety, Costs by Gudrun Bornhöft and Peter F. Matthiessen (Editors). 2011. ISBN 978-3-642-20637-5),* commissioned by the Swiss Federal Office for Public Health (BAG) on Homeopathy states that:

"There is sufficient evidence for the preclinical effectiveness in the clinical efficacy of homeopathy and for its safety and economy compared with conventional treatment."

After a referendum in which 67% voted in favour, the Swiss Government, has given Homeopathy the same status as conventional medicine by it's inclusion in a list of services covered by 'statutory (public) health insurance'.

Why **were** the positive results and recommendations of this Swiss Report **excluded** from the TGA's Consultation Paper.

Faulty Evidence
Why were two negative and questionable reports/issues included in the Consultation Paper in Option 1 (p47). In particular, the reference to the NHMRC Report, which is currently before an Australian Ombudsman for a determination as to conflict of interest, bias and other irregularities. The other reference is to the '2009 Government Review' which has now been overturned by the UK Parliament?

Why would the TGA consider removing Australians' right to access Homeopathic information, products and services based on a questionable NHMRC report and erroneous statement made in the UK parliament as to 'placebo treatments'?

There is a blatant breach of duty of care by the TGA's in it's failure to recognise and acknowledge all International Regulatory frameworks, policies, procedures and conclusions whether supportive or non supportive of the Australian Governments claims as to the non efficacy and safety of Homeopathic products.

With this breach may also come a perceived bias aimed at supporting the Government's attempt to exclude Homeopathic Products as Therapeutic Goods by way of Option 4 of the Consultation Options.

The freedom and right to choose

The TGA's role is to protect public safety to 'regulate low risk products' that are safe for the public to use, which Homeopathic Products are - unless evidence can she found to show otherwise.
It's scope and purpose does not include the taking away of the consumer's right to choose, or to continue to use products, Homeopathic products, particularly when safety is not an issue.

Safe and 'low risk' products

There were 16,651 **'***drug induced deaths in the US in 2010* '- https://www.ncbi.nlm.nih.gov/pubmed/24264508
Prescription drugs '*contributed to 330 of the State's 420 overdose deaths in 2015*" in Victoria- http://www.abc.net.au/news/2016-04-05/pharmaceutical-drugs-in-nearly-80pc-of-victorian-overdose-deaths/7300036).
There is no evidence to suggest that Homeopathic products have harmed or contributed to any deaths.

Homeopathy products are not “high-risk” drugs and should be regulated in line with other natural and complementary products.
Homeopathic products have little or no risk to health of consumers.

HECS/FEE Help Debts

Option 4 threatens the practice of Homeopathy.
Will HECS/FEE HELP debts be repaid by the Government, if Homeopath’s can no longer access products and work in the area in which they have been trained?