

Submission on Consultation: Options for the future regulation of “low risk” products” paper

Having read through the Consultation: Options for the future regulation of “low risk” products, paper I would like to make a submission in regard to section 46, Homeopathic Products.

I support option 1 - Maintain the status quo regulation of homoeopathic products.

Homeopathic products are a therapeutic good and it would be inaccurate to remove them from the TGA. Furthermore, I do not see that any changes need to be made to the current system as it is not creating any problems.

The paper refers to the NHMRC Homeopathy Review, which applied much higher levels of evidence than the TGA does for its scientific evidence. E.g. the TGA may accept a study with 10 participants for studies on natural medicines however the NHMRC would not accept a study below 150 participants for homoeopathy for a trial to be ‘reliable’. The NHMRC report also specified an unusually high 100% quality rating for a trial to be considered ‘reliable’. To use the NHMRC threshold as evidence criteria is therefore irrelevant for TGA’s purposes of listing products on the (ARTG). It subjects homoeopathic evidence to a much higher standard of assessment than any other evidence assessed by the TGA, lacking fairness. Mention of the NHMRC report is therefore not relevant to this decision process.

Regulatory monitoring is required to ensure public safety (e.g. adverse reaction monitoring). This includes ensuring that products sold in Australia are manufactured according to Good Manufacturing Practice. TGA’s role is to protect public safety.

The paper also makes the incorrect judgment that homoeopathy is ‘not evidence based.’ There is actually a wide body of scientific research into homeopathic products.

“By the end of 2014, 189 randomised controlled trials of homeopathy on 100 different medical conditions had been published in peer-reviewed journals. Of these, 104 papers were placebo-controlled and were eligible for detailed review:

- **41% were positive (43 trials)** – finding that homeopathy was effective
- **5% were negative (5 trials)** – finding that homeopathy was ineffective
- **54% were inconclusive (56 trials)**” *Homeopathy Research Institute*

In 1854 the London Homoeopathic Hospital was highly successful in treating a cholera epidemic.

“The hospital’s first great success came in 1854, when a cholera epidemic broke out in Soho, originating from the water of the Broad Street pump. At that time, the London Homoeopathic Hospital was the closest hospital to the pumps and achieved remarkable success in treating the victims of the epidemic. The

Hospital's mortality rate was 16 per cent, compared to 53 per cent at the nearby Middlesex Hospital." *History of the Royal London Hospital for Integrated Medicine*

I am a consumer who has used homeopathic remedies for 20 years to successfully and safely treat a variety of complaints, including mastitis, candida, cystitis, styes, conjunctivitis, sore throats, tonsillitis, and complaints that my doctor was unable to offer any treatment for, such as warts, dysmenorrhea, depression and anxiety. Not only have these products been completely effective but they are 100% safe with no immune-compromising side effects. They are also totally safe for pregnant and lactating mothers.

The Hippocratic Oath states that the practitioner shall do no harm, only good. The side effects of many pharmaceutical products are particularly alarming while homeopathy is completely safe. The safety and efficacy of homeopathy make it my treatment of choice.

I am concerned that option 4 would make it harder for homeopaths to practice. That would have a direct negative impact on myself and my family and I believe, would end up costing the health service more. People seeking homeopathic therapies would have to buy them online without the guidance and expertise of a homeopathic consultation. This would clearly be a retrograde step.

I always go to my doctor first for a diagnosis but in the past have never found traditional medicine effective, leading me on a thorough search for more effective alternatives. I have been impressed at the scope and efficacy of homeopathic treatments and of the ability of homeopaths to offer straightforward diagnoses where doctors have been unable to. Where I have often left a doctor's surgery feeling worried and helpless I always leave my homeopath feeling confident, inspired and empowered.

Homeopathy, by taking a holistic view and looking at the patient's whole history, not just an isolated set of symptoms, has always been able to help, no matter what my problem. This has given me the confidence to know that I can overcome any condition and enjoy wonderful levels of health and vitality. Which I do. Whereas a doctor sees a patient for 5 mins, 15 at most, a homeopathic consultation takes an hour. The patient is encouraged to talk about their whole health history. This is highly therapeutic and allows for a better understanding of the patient's constitution.

By working on the mind/body system as a whole, homeopathy works at strengthening the immune system, thereby increasing overall health. This saves the health system a lot of money. Knowing that I can use homeopathy as a support gives me much more confidence when I need to undergo processes such as dentistry, surgery and nuclear medicine procedures.

In the past 20 years the only times I have had to use the public health system have been for essential surgery – a D&C following a miscarriage and a mastectomy for early stage breast cancer. All other health issues I have successfully treated using homeopathy or other complementary therapies that

give me sovereignty over my own health. Even with the breast cancer, using homeopathy as a support and doing what I could in terms of dietary and attitudinal changes gave me the confidence to face the diagnosis and surgery without fear and I did not need further treatment.

Every one is ultimately responsible for their own health and it is the right of every individual to be able to make informed decisions about their health care and choose the treatment that they want. It is important that allopathic medicine is not the only treatment available.

I believe that most members of the medical profession do not understand homeopathy, have not read the research and condemn it through ignorance and fear. This is not a valid reason to deny its therapeutic abilities. I do know, however, of many medical doctors, in Australia and overseas who have also trained as homeopaths and incorporate homeopathy into their medical practice.

I therefore support option 1, to maintain the status quo.