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Re- Consultation: Options for the future regulation of "low risk" products

To Whom It May Concern,

I wish to make a submission as part of the consultation process for '*Options for the future regulation of "low risk" products.'*

Broadly speaking I wish to express a general concern that in the regulatory framework expressed to assess risk, efficacy of the various items being considered was included in your risk assessment. While safety of products is essential and must be assessed and regulated to a high level; efficacy of products is equally important. Any 'risk analysis' is meaningless without a corresponding 'benefit analysis', conceptually one cannot assess a risk as being acceptable or unacceptable without knowing the benefits one is incurring along with the risks and which one outweighs the other.

Consequently, as a blanket caveat to the below: I believe that via whatever agency/regulatory framework the below end up under, the regulation of them should include an assessment of efficacy in regard to sales eligibility and marketing/promotion claims. I believe that under this sort of scheme, the below items would not pass any sort of efficacy requirement and thus not be permitted to be sold/advertised as having any sort of medical or therapeutic benefit.

In regards to specific items being considered:

1) Ear candles

Option 3 is the lesser of three evils. Noting that there are no clinically proven, objective benefits of ear candling this option is the best as it prevents ear candling making therapeutic claims and removes the perception of 'TGA approved'. Arguably given there are no scientifically proven benefits, the risk of this option permitting 'substandard products' is moot. Noting that subjective benefits such as 'feeling better' or 'relaxing' are, in my opinion and I feel in a scientific sense, not sufficiently objective to actually be therapeutically or medically beneficial.

2) Aromatherapy products

Again, Option 3 is the lesser of three evils. Noting that there are no clinically proven, objective medical benefits of aromatherapy products this option is the best as it prevents aromatherapy products making therapeutic claims and removes the perception of 'TGA approved'. Noting that subjective benefits such as 'feeling better' or 'relaxing' are, in my opinion and I feel in a scientific sense, not sufficiently objective to actually be therapeutically or medically beneficial.

3) Vitamins and minerals

I believe that Option 3 is the best option but honestly I'm not sure what the effects would be of State/Territory based regulation or the specifics of food supplement regulation by FSANZ. But by preventing vitamins/minerals from making therapeutic claims that are scientifically unsupported except in individuals with medical issues or grossly imbalanced diets would be a step in the right direction.

4) Homoeopathic products

Homeopathy is, to be blunt, insane unscientific rubbish that violates so many fundamental parts of biology, chemistry and physics that it cannot work. And if it did work there would be a dozen Nobel prizes in it. The best option for this is Option 4 as that prevents this dangerous pseudoscience from preying upon desperate and seriously sick people with its products that have been conceptually proven to be magical thinking.

Finally, as an addendum to the four above items; I believe the stated risk of a perceived 'lowering of the quality of the product' would in fact be a benefit as such a perception would potentially make more Australian's aware that there are no proven medical benefits of the above products. And hopefully they would seek and receive actual medical advice or treatment as required. Potentially saving lives and improving the quality of life for people who are mistakenly taking the above items under the false impression they are beneficial.

Thank you for taking the time to read my submission.

Kind regards,