

Regarding options for the future regulation of low risk homœopathic medicines

Government endorsement of homœopathic medicines, as is the current situation, needs to be maintained by the TGA under Option 1 for several reasons:

- Practitioners who are registered with the professional Homœopathy registers are able to do so as they have obtained a qualification that is government endorsed and maintain appropriate CPD standards. Therefore, to deem that the medicines they use are non-therapeutic, implies with the stroke of a pen, that their professional status is an irrelevancy, as are the government processes that oversee endorsement of education standards, and may deny them the ability to earn a living. This flies in the face of natural justice, and is illogical.
- Furthermore, by citing that the NHMRC report provides a framework for rendering the homœopathic profession a non-therapeutic model, the TGA is in error as that report is currently before the national ombudsman on the grounds of bias and flawed process.
- Additionally, by citing the 2009 UK government review as providing additional basis for branding homœopathic medicines as non-therapeutic agents, the TGA errs as the report was not endorsed by the UK parliament.
- Also, that the TGA, by overlooking the Swiss Report on Homeopathy which stated: “There is sufficient evidence for the preclinical effectiveness and the clinical efficiency of homeopathy and for its safety and economy compared with conventional treatment.” It has itself demonstrated bias by not providing an opposite government perspective.

Homœopathy is a traditional medicine with over 200 years of continued use. It is recognised world-wide and acknowledged by the WHO.

The TGA has the ability and discretion to recognise traditional forms of medicine and so should continue to do so with respect to homœopathic medicines. These are listed in internationally accepted pharmacopeiae as underpinned by various provings which form the basis for the compilation of all materia medicae used as textbooks for students undergoing homœopathic education and by practitioners in their clinics.

There are several thousand medicines currently in use by homœopaths world-wide and so to deem that homœopathic medicines are non-therapeutic (Option 4) when the TGA has merely 220 products listed on the ARTG, (largely for OTC use and self-medication) is over-reaching its jurisdiction.

Option 1 must prevail.