

Regulatory Reforms Team  
Therapeutic Goods Administration

9 May 2017

Dear Sir or Madam,

RE: TGA Consultation on Low Risk Products (Homeopathics)

I am currently studying Homeopathy at Endeavour College in Melbourne and I am in my last trimester of graduating with Advanced Diploma of Homeopathy. This course is fully accredited with the national homeopathic registration body AROH (Australian Registrar of Homeopaths).

I have used homeopathy as a main healthcare modality for myself and my family for over 20 years finding it the safest and most successful form of healthcare. I have seen its uses in many different situations – from anaphylaxis, acute to chronic diseases. As a result of the high success rate I wish to practice and provide homeopathy as a healthcare to people that chose to use it.

I am extremely concerned with regulation changes that are being considered by the TGA relating to removing Homeopathy as a therapeutic option.

Homeopathic Medicine is a Traditional medicine used worldwide for hundreds of years and is recognized by the World Health Organisation and therefore it should continue to be recognised as a therapeutic option as other Traditional forms of medicine are.

The NHMRC report mentioned in this consultation paper uses a higher standard than the TGA uses currently for assessment of Homeopathy and therefore should not have been mentioned as it is misleading lacking fairness and equality while being totally irrelevant. This report is also currently subject to a complaint to the Ombudsman and on this basis should not have been cited in the consultation paper.

UK Government rejected any review on Homeopathy and it should not have been mentioned in the consultation paper to imply validity to its unaccepted conclusion.

To state that Homeopathy is 'not evidenced based' is false. There are multiple positive research studies on the effectiveness of Homeopathy available, many of which can be viewed on the Homeopathic Research Institute website <https://www.hri-research.org/> including a Swiss Health Technology Assessment Report on Homeopathy which stated "There is sufficient evidence for the preclinical effectiveness and the clinical efficacy of homeopathy and for its safety and economy compared with conventional treatment." As a result Switzerland is giving Homeopathy the same status as conventional medicine in regards to health insurance.

By not including positive research published on Homeopathy it is limiting view without fairness, equality and balance.

From my own experience and positive results using Homeopathy as my family choice of healthcare and taking into account all of the points mentioned above, I strongly oppose any changes being made that would affect the status of Homeopathy as a therapeutic option.

Yours sincerely,

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