

TGA Consultation: Options for the future regulation of “low risk” products

Submission – Regarding Homeopathy

In support of Option 1 - Maintain the status quo regulation of homeopathic products:

- The TGA and drug regulating authorities around the world consider homeopathic remedies to be “low-risk” medicines
- Based on the evidence, the TGA’s Swiss counterpart has given homeopathy the same status as conventional medicine in regard to health insurance
- The TGA’s role is to safeguard and enhance the health of the Australian community through effective and timely regulation of therapeutic goods, not to restrict access to safe medicines
- Homeopathy is recognised by the World Health Organization (WHO) as the most popular and widely used complementary medicine worldwide. It is affordable and safe healthcare. Why would the TGA consider restricting the access of homeopathic medicines to Australians?
- Trained Homeopathic Practitioners who are licenced and regulated by a Homeopathic Association should not be prevented from prescribing homeopathic medicines
- The Swiss Report on Homeopathy says, “There is sufficient evidence for the preclinical effectiveness in the clinical efficacy of homeopathy and for its safety and economy compared with conventional treatment.” Therefore, why did the TGA exclude this favourable report from its consultation paper yet refer to two negative reports, one of which is currently before an Australian ombudsman for bias and irregularities, and the other, already rejected by the UK Parliament?

In rejection of Option 4 – Declare homeopathic products not to be therapeutic goods:

- Option 4 threatens the very practice of homeopathy. Will student HECS debts be repaid by government if they can no longer work in the area of their training?
- By not recognizing homeopathic remedies as therapeutic goods in Option 4 of the consultation, the TGA will be out of step with other governments, worldwide, who do.
- HRH Queen Elizabeth II has publically discussed her use of homeopathic medicines for many years and continues to do so. The Royal Physician Dr Peter Fisher, who is also Clinical Director and Director of Research at the Royal London Hospital for Integrated Medicine, says that homeopathy is ‘safe’, ‘popular with patients’ and reduces the need for antibiotics.