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

Re: Homeopathic products

My preference is for something akin to Option 4, "homeopathic products not to be therapeutic goods" and require clear labelling to that effect, but phrased so that members of the general public will understand they product no health benefit.

My other concern is that if there is a direction to use "as directed by a healthcare practitioner", there may be confusion in the minds of the general public that homeopaths can be considered "healthcare practitioners", and so will use products with no therapeutic value.

My other concern is that the homeopathic industry may try and escape this by treating products as foods or drinks, and using Food Standards Australia to sneak their claims of health benefits through a less scientific body that can be more easily subject to political pressure.

The objective should not be merely to avoid regulatory costs of agencies, but to ensure that there are no "escape holes" where Australians can be misled. Therefore it should be the responsibility of the TGA to ensure that other agencies, such as ACCC and Food Standards Australia are provided with strong advice on the issue so that they take on the responsibility too.

At the same time, the health insurance companies should be told explicitly that there are no therapeutic benefits from homeopathic products, and therefore taxpayer funds should not be used to subsidise fees that are used to pay for such products.

Thankyou