

TGA submission – low risk products

I am writing to submit my support for keeping homeopathic products/medicines as part of the Therapeutic Goods Act under the category of low risk products - Option 1

I have worked with patients as a qualified homeopathic practitioner and as a training manager for the Victorian College of Classical Homeopathy for more than twenty years. A qualified practitioner must have a recognised training level, full public indemnity insurance, up to date first aid training and use remedies/medicines that are approved for health purposes. The current system allows this safety net for patients.

Homeopathic remedies/medicines are safe and non-toxic due to their high dilutions. They must be made and prepared to the highest homeopathic pharmaceutical standards. Many of these products are not available to the general public. The conditions they can treat should only be done so under qualified supervision. Almost all patients are also under conventional treatment. The combination of the two approaches – which are synergistic to each other – allows for patients to have the highest level of safe health treatments.

Keeping homeopathic remedies/medicines under the current regulation model is the safest and most appropriate outcome for Australian patients. If these products are removed or demoted in any way, Australian patients will be the worse off. The issue of scientific evidence for these products is outside the scope of the Therapeutic Goods Act. The fact is, these products have been used with safety in Australia since the 1880's and the current system has meant both practitioners and pharmacies have to provide the highest level of safety and standards for their patients/customers. The current scientific evidence argument has been well met by the Australian Register of Homeopaths and other allied health organisations. The fact that some of this evidence has been rejected – under speculative circumstances – is not the realm of the TGA. The Ombudsman's office is currently reviewing a submission where the evidence for Homeopathic remedies/medicines has been supported. Another fact is that many countries around the world – India, Germany, Switzerland, Brazil – support homeopathic treatment and remedies/medicines within their health systems. To in any way, compromise the effective use of this safe and gentle health approach is a backward step.

The trend for patients to investigate their health conditions via online prescribing and measures, often ordering substances that are not covered by the TGA, is a more onerous position for the health of Australians. The current system gives quality assurance to Australians and should not be tampered with in any way. Qualified alternative health practitioners work alongside doctors to ensure patients get effective diagnosis' and use appropriate treatments that are regulated.

Do not invoke option 3 or 4.

Regards
Louise Bentley

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Victorian College of Classical Homeopathy
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