

My name is Gerard Bocquee. Having worked for the Mauritius Sugar Industry Research Institute, I am acquainted with protocols, procedures, safety, accuracy and all that proper science demands. I have owned and managed the Homeopathic Supply and Research Laboratory of Australia since 1981.

I understand chemicals and their role in food products having worked in product development at a large manufacturing complex in Durban, South Africa.

I was part of a team for the commissioning of a hydrogenation plant where they use Nickel catalyst in the process. I understand that a catalyst initiates a reaction but does not take part in the reaction or in the final product. This is considered safe.

I consider Homeopathic potencies safe and effective for a similar reason. Homeopathic medicines act as a catalyst in that they trigger a reaction in the body that cannot be measured in chemical terms. Neither can a catalytic reaction be explained, it is accepted as such because the proof is in the final product. If the product is marketable and deemed safe it is allowed for consumption. This should be the case for Homeopathic products. They have never been proven to be unsafe, neither have they been proven to be ineffective. Just because they cannot be proven does not mean they do not exist. The evidence should be the millions of people who over the centuries have testified to its benefits and safety. Any decision by the TGA to reclassify Homeopathic medicines as not therapeutic is an insult to the very science it purports to protect, any decision by the TGA to reclassify Homeopathic medicines as not therapeutic will be seen as an attempt to shut down the truth, any decision by the TGA to reclassify Homeopathic medicines as not therapeutic will tell the population of this country how policies are made in this country.

Dear Sir, Madam I urge you not to go down the path of Australia being ridiculed for decisions based on commercial science. The nature of Homeopathic preparations will not change just because the TGA decides to reclassify it as non-therapeutic. What will change however is the change of mind that follows the verdict of but one man not being able to come to terms with the reality of the science of Homeopathy. Is the TGA willing to go down the path of those who believed in the flat earth theory and willing to kill for it?

I hereby give the following reasons in support of retaining Option 1, which is to keep homeopathy regulated the way it is.

The word Therapeutic means healing, health giving, restorative, tonic, beneficial, curative, remedial, as well as medicinal. Homeopathy has been known and accepted as restoring to health, beneficial in cases of ill health and having healing properties which is the process of making healthy again. Healing is a natural process that occurs after simple things such as a cut or a wound. Healing is an inborn mechanism. It is our birth right.

The TGA has seen it fit that Homeopathy be seen as therapeutic since its inception. I see no reason for this to change.

The very definition of the word therapeutic implies treatment or therapy, and not necessarily curative.

Therapeutic does not imply curative. Conventional medicine consistently tells us that the majority of diseases are not curable, hence the use of the word relief. One could say that certain therapies give relief for longer periods than others.

A survey of most textbook on clinical medicine tells us that the majority of medical conditions are incurable. This in itself implies that chemist line medications (prescription medicine) do not have curative properties and therefore do not fit the very definition of 'therapeutic' but is nevertheless accepted as such in the broader sense of the word.

The TGA's role is to protect public safety and not to make decisions on what is called evidence or lack of it. I believe that this is why this proposal is flawed unless it adopts the status quo. Homeopathy, like Counselling, Chinese medicine, Ayurvedic medicine, Physiotherapy and so on are all therapies. The evidence for these therapies are not in question. So, we now have a situation whereby Homeopathy has been the **only therapy** that has ever run hospitals and still does and yet it is the one therapy that is being put in question. Does that sound like discrimination?

Our innate immune system acts as our body's inbuilt therapeutic system through white cells etc. therefore to say that a person or a group may have ownership of therapeutic goods is akin to saying that someone can have ownership of our immune system.

If the TGA is to have such authority as to declare Homeopathy therapeutic one day and non-therapeutic the next then where does that put the population at large when it comes to who owns what. Is the word therapeutic fast becoming the new politically correct language? Is the TGA going to take ownership of our immune system because it has therapeutic properties?

Take another issue, that of exposure therapy, which is a system whereby people who suffer from arachnophobia are exposed to spiders and are said to recover from their fears of spiders. This is nothing else but Homeopathy in a different form. Who then will own the procedure of 'exposure therapy' if in this instance, the spiders are the therapeutic agents? Are the spiders liable to be declared as therapeutic agents?

It is pretty obvious that the TGA's proposal to reclassify homeopathy has gone beyond what is reasonable, especially as it stems from a person or body that not long ago said that homeopathy should be declared unethical because there was no evidence of its therapeutic value

Will the NHMRC please inform whether there exists a double-blind study done prior to Antivenom being declared therapeutic? What I read is '**informed consensus**', even so snake bites are medical emergencies'. Furthermore, it states that: 'Because of the lack of clinical evidence a consensus protocol was adopted'. The *BMC Emergency Medicine* journal writes

“In resolving points of divergence among panel members, the panel relied upon published data (where available), supported by the **collective experience of panel members**. Consensus was defined as **unanimous agreement** of all panel members”

In removing the current bias and in recognizing the fact that Homeopathy has similar challenges in having its evidence accepted I urge the TGA to retain the current situation as it is an established precedent.

I thank you for considering my submission.

Ref.: <https://bmcemergmed.biomedcentral.com/articles/10.1186/1471-227X-11-2>