

Submission to the TGA in relation to the Consultation Paper on Homeopathic Products

I submit to the panel the following:-

As a practising Homeopath, I have concerns about the direction of the profession and the ability to serve the public as a practising and registered Homeopath. I speak for myself but I am sure that I reflect the beliefs of many of my colleagues.

In the later part of the last millennium, I was a practising and registered veterinarian which I had been for twenty five years at that stage. I was concerned that there were many pharmaceuticals which were protocoled for certain conditions that were not curing but more suppressing their symptoms and creating in them side effects which reduced their quality of life or in fact decreased their longevity.

I was introduced by a German trained Veterinarian, to Homeopathic medicines produced by the German based company HEEL. At first I was sceptical, but after seeing positive results I started employing them in the treatment of some of my patients with remarkable result. It was then that I reasoned that these medicines worked and were not placebos. I then entered a four year course in Advanced Diploma of Homeopathic Medicine and concurrently a post graduate course in Homotoxicology to understand how to apply these medicines and fathom out their action in the mammal or infact the avian or reptile in which I have used them. Placebos, one would think, would hardly apply to these creatures especially if wild or undomesticated.

I might add that the scientific investigation of these medicines by HEEL was well documented and shown to be efficacious in both human, bovine and canine which gave me comfort and confidence in prescribing them. Many of these scientific studies are published and available on the net from HEEL. It always amuses me when I hear that no scientific evidence is available for Homeopathy.

The courses I undertook were in reference to the human but applied equally as well to other mammals. I now practise as a human Homeopath and have done for the last twelve to thirteen years. It disturbs me, and I am sure the profession in general, that Homeopathy is not taken seriously as it does not fit the paradigm to which Western Conventional Medicine applies. It cannot be assessed this way. Because of this, it is seen as unscientific and sadly has been removed from Natural Medicine Teaching Institutes in our supposedly democratic country.

Now with reference to the Options outlined in the Consultation Paper referring to Homeopathy:-

Option 1 Regulation the way it is.

Any consideration given to the NHMRC 's Homeopathy Review should not be employed by the Consultation Panel due to the unprecedented, unscientific bias exposed in its findings. The NHMRC's review should not have been mentioned in this Consultation paper due to its questionable efficacy and the fact that it is subject at present to complaint to the Ombudsman.

To use the NHMRC threshold as evidence criteria may very well not be relevant for the listing of products on the ARTG, as the NHMRC's review has subjected homeopathic evidence to a much higher standard of assessment than any other evidence assessed by the TGA, lacking fairness when considering Homeopathic medicines.

If accepted, this distorted NHMRC's methodology will be used in the future assessment of efficacy of medicines. Homeopathic medicines need to be given the same opportunity as other complementary medicines for traditional or scientific evidence. The relevance of the NHMRC's findings to the decision made by TGA is therefore questionable and likely irrelevant.

It is the TGA's role to ensure public safety by regulatory monitoring and not to make value judgements about products the Australian public choose to use as therapeutic goods.

On the same note, the UK Government's review cited in the consultation paper was rejected by the UK Government and therefore should not have been included to imply validity to its unaccepted conclusion.

I consider Option 1 as therefore null and void.

Option 4 I would recommend to the Panel that in declaring that Homeopathic Products are NOT to be Therapeutic Goods has not considered worldwide trends in establishing Homeopathic medicines as therapeutic.

This recommendation is contrary to World opinion and I refer to the ACSS Consortium workings of which there is an affiliation with the TGA and also the incorrect biased value judgement made in the Consultation paper in Option 1, that Homeopathy is "not evidence based" I refer to Homeopathy Research Institute web page for evidence of positive Homeopathic research.

The Swiss report on Homeopathy 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." Its inclusion in the recommendations would have given perspective and balance.

Homeopathic Medicine is a Traditional Medicine used worldwide and recognised by WHO and hence on this basis alone, it deserves to be recognised as a therapeutic option. TGA has the ability and discretion to recognise Traditional forms of medicine and not just evidence based medicines and this should include Homeopathy. Homeopathic medicine should therefore not be removed as a therapeutic option for those who choose to employ it.

Option 2 Maintaining the way it is. Requiring scientific evidence for higher therapeutic claims will be captured in the new guidelines and demands much consideration as a valid option.

Option 3 Exemption of Homeopathy from listing. This is completely valid if it allows for continued use with low level claims and recognition of its Worldwide Traditional acceptance as a medicine. It may allow for greater homeopathic options into the Australian market.

Kelvin R Boys

Homeopathic Practitioner

4th May 2017