9/5/17 Penny Barron



To whom it may concern,

I am writing in regards to the latest TGA consultation on including homeopathy in the "low risk" products category alongside foods and other "non-medicinal" substances, a stance that would have Australia the only country in the world to do this.

This move to further reduce the status of homeopathic products follows close on the heels of the controversial NHMRC "investigation" into the efficacy of homeopathy, which has been referred to the ombudsman for its deeply flawed methodology.

The inclusion criteria of studies that were able to be used in this "investigation" were so unreasonably and unusually high, it basically negated a large amount of positive-outcome, high quality homeopathic studies. This biased practice significantly and negatively skewed the outcome of the results in a way that was not reflective of the true effectiveness of homeopathy.

One only needs to observe Switzerland and India, for example, who have included homeopathy and other complementary modalities as equal alongside conventional medicine. (Please refer to the Swiss Report on CAM medicines). This inclusive and integrated practice has been shown to offer the best outcomes in patient care, as it encompasses preventative health practices along with pharmaceutical treatment of disease.

To further highlight the bias seen in this study, I must point out that other modalities in the health field which have been investigated by the NHMRC have not been subject to such rigorous inclusion criteria for studies accepted into their investigation.

Not only that, this investigation into homeopathy was not the first carried out by the NHMRC. The first investigation, of which the results have been suppressed, was withdrawn for no known reason before publication, the respected researchers who worked on this first investigation dismissed.

Not only did those conducting the second investigation refuse to consult with a professional homeopath, there were members of this team who had strong affiliations with a known and virulent anti-homeopathy organization, which strongly suggests very unscientific bias and conflicts of interest.

In the light of these allegations, and especially given that the NHMRC investigation that this move is based around is under scrutiny by the ombudsman, it seems very hasty to push for this change of category in the midst of such contention.

Seeing the way health care is heading in Australia where pharmaceutical error is becoming one of the leading causes of death, added to the explosion of chronic health conditions in our society, it is mind boggling to observe these mysteriously motivated agendas to push complementary medicine ever further from the public's accessibility.

It is also mind boggling to see such stubborn refusal by our government (to the point of outright dishonesty!) to acknowledge the steadily increasing evidence base in favour of the efficacy of homeopathy and other complementary modalities. This direction will not enhance the quality of life and general health of Australians, more and more of whom are seeking complementary care as they see for themselves its worth in contributing to their health.

Surely it is obvious to see that an integrated approach to health care would contribute to reduced overall costs in healthcare. One only has to look at the waiting list of an integrative doctor to see how popular and effective the two methods used side by side can be. This has been demonstrated in countries which have embraced and supported the practice of complementary modalities for maintaining health and preventing onset of chronic disease, rather than attempting to stomp them out like the Australian government has been doing.

This latest move defies all logic in the current health care crisis, which is costing Australia billions. The use of complementary medicines has been shown to reduce the cost of overall medical care as it focuses on promoting health before the need for conventional medical care. To change the status of homeopathic medicines would in the long term negatively impact the health choices of Australians. I request that you keep the status of homeopathic medicines as it is, and see beyond the untrue and corrupt NHMRC report.

Sincerely

**Penny Barron** 

For more information:

http://www.homeopathyoz.org/images/news/lamaro-2014.pdf - Press release by the Austrlian Homeopathic Association: critique of the flawed NHMRC report

http://www.springer.com/gp/book/9783642206375 Homeopathy in Health Care report by the Swiss government

http://ayush.gov.in/ Information about homeopathy on the Indian government's official website