



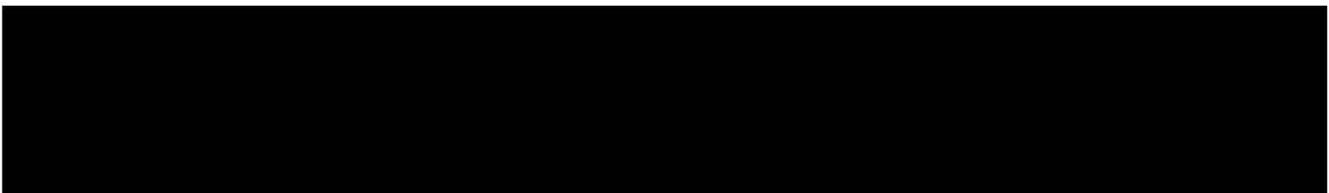
Evidence required to support indications for listed medicines (excluding sunscreens and disinfectants)

VITAMINS AND MINERALS

1. Vitamin and minerals supplements are accepted as “healthy’ by the Australian public because of brand advertising, endorsement by celebrities and sponsorship of sporting activities.
2. A few high-quality manufacturers produce practitioner-only supplements of superior quality and efficacy, supported by clinical trials or more rigorous evidence.
3. The Australian public will benefit from tighter regulation of OTC supplements to prevent claims of quality and efficacy that cannot be supported.
4. Manufactures of practitioner-only products need support and encouragement to continue providing high quality, efficacious supplements.
5. Vitamin and mineral supplements must be regulated as now to prevent further erosion of quality and efficacy and emergence of low quality OTC products.
6. Given the inaccuracy and bias of the 2015 NHMRC report (2nd report) on Complementary Medicines, and suppression of their first report that found evidence of safety and efficacy for many Complementary Medicine modalities, the first report should now be published to reassure the Australian public that practitioner-only vitamin and mineral supplements, when prescribed by a healthcare practitioner appropriately trained in nutrition and supplementation (e.g. Naturopath, Nutritionist, Integrative Medical Practitioner), are both safe and efficacious.
7. **Option 1** is my preference with renewed supervision of OTC supplements and encouragement/support of manufactures providing practitioner-only products.

HOMEOPATHIC PRODUCTS

1. Homeopathic Medicine is a traditional modality that is used worldwide by many millions of people, both as a stand-alone therapy and in conjunction with Western Allopathic Medicine.
2. Homeopathic Medicine can be recognised as a traditional medicine which recognises traditional patient outcomes rather relying only on RCT or other Western Allopathic-style evidence.



3. Option 1 – the NHMRC conclusion that there is no reliable scientific evidence that homeopathy is effective was inaccurate at best and, at worst, deliberately misleading.
 - a. This report was based on 176 studies, despite claims that it was based on 1863 studies. Of the 176, only 5 were actually reviewed under the criteria set by the reviewers. The reviewers did not actually read any of the studies.
 - b. The criteria set for assessment of evidence was set much higher than for any other form of medicine (including Western Allopathic Medicine) and, through this mechanism, was deliberately biased against a positive finding.
 - c. This report was scientifically flawed either because the reviewers lacked scientific skill or because they deliberately set out to mislead the Australian government and public.
 - d. This was the second report from the NHMRC. The first report, which has been suppressed, found positive evidence of safety and efficacy for many homeopathic medicines.
 - e. The first report must now be published and all TGA discussion and deliberation based on this, not the second report.
4. Option 1 – the 2009 UK government review cited in your discussion paper was rejected by the UK government, so has no validity in this discussion.
5. Option 1 – a Swiss government report concluded that homeopathic medicine is as safe and effective as Western Allopathic Medicine; yet this was not cited in your discussion paper.
6. Given that Homeopathic medicine is already adequately regulated, that there have been no reported deaths or serious injury from Homeopathic treatment by a registered practitioner, I see no reason to move beyond **Option 1 – Maintain the status quo.**