TGA response regarding potential restriction of Homoeopathic Information and Remedies

I am a user of homoeopathic medicines for over 16 years, having used this modality very successfully and most importantly, without any side effects at all. I find the TGA Proposal totally unacceptable if it is proposing in any way to restrict or hinder access to homoeopathic practitioners and medicines.

I totally reject option 4 of the TGA Proposals. If this was to be enacted I would then simply source homoeopathic assistance from overseas.

Some point I would like to bring to the attention of the TGA:

1. Homoeopathy is recognised by the World Health Organization (WHO) as the most popular and widely used complementary medicine worldwide. Entire communities depend on it for healthcare and the prevention of epidemic disease. That being so, why would the TGA consider restricting the access of Australians to it?
2. The Swiss Report on Homoeopathy says, "There is sufficient evidence for the preclinical effectiveness in the clinical efficacy of homoeopathy and for its safety and economy compared with conventional treatment." That being the case, why did the TGA exclude this favourable report from its consultation paper yet refer to two negative reports, one of which is currently before an Australian ombudsman for bias and irregularities, and the other, already rejected by the UK Parliament?
3. Why would the TGA consider removing the access of Australians to homoeopathic information and products when, based on the evidence, the TGA's Swiss counterpart has given homoeopathy the same status as conventional medicine in regard to health insurance?
4. By not recognizing homoeopathic remedies as therapeutic goods in Option 4 of the consultation, the TGA will be out of step with other governments, worldwide, who do.
5. Why does the TGA draw from a report being investigated for complaints of serious irregularities, some of which include:
    a. conflicts of interest,
    b. bias and absence of fairness,
    c. the withholding of important information and commentary from the Australian public, and
    d. the expectation that homoeopathy should meet a much higher standard of evidence than that set for other therapies or medicines – conventional or complementary?

In referring to the flawed NHMRC report, the TGA says regulating homoeopathic products as part of evidence-based medicine will be an "issue". The inference is that the NHMRC report is correct and there is no evidence for homoeopathy. A significant and growing body of evidence is available for those prepared to look. [See the Homoeopathic Research Institute as one source:) Why does the TGA ignore this in favour of flawed reports?

Millions of people worldwide acknowledge the benefits of homoeopathy. It would not be growing at the rate it is if it didn't work.

Regarding the position of the TGA in respect of managing alternative medicines, it is my opinion that:

1. The TGA is there to protect people's safety in relation to medicines and treatment, not to restrict access to safe medicines.
2. The TGA and every drug regulating authority around the world considers homoeopathic remedies to be "low-risk" medicines – so why would there be a need to change this disposition now?
3. Consumers and users of homeopathy, do not want:
    a. Self-help information about homoeopathy and the symptoms and ailments it treats, restricted.
    b. Homoeopathic prescribers to be stopped from providing that information, or prescribing homoeopathic remedies.
    c. Regulations designed for high-risk medicines applied to homoeopathy which, by the TGA's own description, is a "low-risk" medicine.
    d. Consumer and user access to homoeopathic remedies restricted.
    e. Changes to the regulations that would inhibit, restrict, or deny the importation, exportation, or manufacture of homoeopathic remedies by homoeopathic manufacturers and pharmacies.
    f. Changes in the current regulations that would either encourage or make it easier for those antagonistic to homoeopathy to lodge vexatious complaints.

For the above reasons, I totally reject Option 4 of the Consultation Paper, and request that the TGA make no changes to the current guidelines and regulations, as there is no need for any changes for a "low-risk" medicine.

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