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Submission to TGA in consideration of classification of homeopathic medicines.

9th May 2017

To whom it may concern

Dear Sir/Madam

I urge your review committee to reject option 4 in this current review in the strongest possible terms and maintain option 1.

Option 4 –Declare homeopathic products NOT to be therapeutic goods.

This is patently not true and therefore has no rational basis. There is a significant and growing body of research evidence to support homeopathy, not to mention 200 years of practice and 200 million users worldwide.

The World Health Organisation recognises homeopathy as the most popular and widely used complementary medicine worldwide.

The TGA risks trashing the best ideals of western thought and returning us to an inquisitional dark ages.

The Swiss government has just stated that their final conclusions as to the effectiveness of homeopathy will be on a three tiered evaluation scale of real world effectiveness: effectiveness likely, questionable or unlikely. They have concluded that homeopathy fits in the category of ‘effectiveness likely’. As a result of this The Swiss Federal Department of Home Affairs decided that homeopathy will be included in the Swiss Statutory Insurance Scheme and reimbursed accordingly.

The TGA’s own guidelines on evidence state that a homeopathic proving is medium level scientific evidence. A proving is a valid n= 1 trial.

As I understand it the TGA is there to protect my safety in relation to medicine and treatment not to restrict my access to safe medicines. All world drug regulatory authorities consider homeopathic medicines to be low risk and there is no reason to change that position.

People have a basic right to choose treatments that suit them.

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Homeopathy has a wealth of evidence to support it: global usage, historical data, clinical data, scientific data, systematic reviews.

The TGA references the NHMRC review and the United Kingdom review; since rejected by the British parliament as part of its review of options .

The NHMRC has already deliberately misled the public with its intentionally flawed and biased report. No less an authority than the Cochrane collaboration states that the NHMRC report may not be an accurate reflection of the data. The NHMRC is currently the subject to an ombudsman's investigation.

Internationally the Homeopathic Research Institute has compiled a damning critique of the NHMRC report. Will the TGA also embarrass itself and admire the emperors clothes? It is an absolute nonsense to suggest that homeopathic medicines are not therapeutic.

Medicine is not practised in a vacuum, there are very powerful vested interests that oppose homeopathy, not because it doesn't work but because it works too well.

Homeopathic medicines are not placebo, they are a valuable, low cost, safe and effective therapeutic good and should be maintained as such.

Having worked in homeopathic hospitals in India I have seen first hand the remarkable things that are possible with a quantum paradigm. I wonder if anyone from the TGA or NHMRC has bothered or dared to look ?

Sincerely

Michael Higginson

