

Submission1: Submitted by multiple organisations/individuals separately

TGA Consultation – Urgent Help Needed!

Homeopathy is at risk of being “banned” in Australia and to stop this, you must respond before midnight on Friday, 12th May.

Helpful points and concerns for your submission are at: [TGA Response: Comments and Concerns](#)

What’s the fuss?

The Therapeutic Goods Administration (TGA) has presented a Consultation on “Low Risk Products” which has serious implications for Australian homeopathy. You can access it on the TGA website at: [Consultation: Options for the future regulation of ‘low risk’ products](#)

Homeopathic products and remedies are mentioned on Page 46-49 of the Consultation Paper.

TGA: Four regulatory options under consideration

Option 1 – Keep homeopathy regulated the way it is.

Option 2 – Keep it the way it is but require scientific evidence for high level claims.

Option 3 – Exempt homeopathy from listing.

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

Pay special attention to Option 4 – “Declare homeopathic products NOT to be therapeutic goods.”

At this point of time it appears that Option 4 is the TGA’s preferred option.*

(*The TGA’s dependence on the flawed [NHMRC Report on Homeopathy](#), which is currently being reviewed by an ombudsman because of irregularities, and the equally flawed [UK Science and Technology Report](#) that was ultimately rejected by the UK Parliament, indicates a potential bias by the TGA: the TGA has shown a preference for these questionable reports while omitting the positive [Swiss Homeopathy in Healthcare Report](#) from its consultation.)

What Option 4 means for all

Option 4 is especially concerning because, if adopted, it will change the face of Australian homeopathy. No claims at all will be allowed for homeopathic products, not even traditional ones currently permitted.

- 1. Consumers and users:** It would no longer be possible for someone to provide a consumer or user of homeopathy with self-help information about homeopathic remedies for various health complaints. It would also be potentially illegal for a homeopath to prescribe a remedy for a user or consumer.
- 2. Homeopaths:** The legal implications for practitioners is still unclear but as homeopathy would no longer be recognised as a therapeutic good, the practice of homeopathy may become illegal. A door would also be opened for those antagonistic to homeopathy to file complaints with the Australian Competition and Consumer Commission (ACCC) against any homeopath for prescribing a “non-therapeutic good”.
- 3. Homeopathic manufacturers and pharmacies:** The demise of the manufacturing and pharmaceutical sector under Option 4 would effectively restrict community and practitioner access to homeopathic remedies.

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Options that help, options that hinder

The TGA's role is to protect public safety, not to make value judgements on faulty evidence.

As homeopathy is the safest option of any medicine available, we and the wider homeopathic community suggest you support Option 1 and/or Option 2 (Option 2 is really an addendum to Option 1, as it still preserves homeopathic products as therapeutic goods but brings them into line with other medicines).

To protect your rights and access to homeopathy, strongly oppose Options 3 and 4.

Time for action

If you love the safety and elegance of homeopathy, and think that Option 4, or one of the other less onerous options, is completely unacceptable, you must make a submission before the Friday 12 deadline to stop their adoption.

As we have said, the TGA's role is to protect public safety, not to make value judgments or restrict access to safe products Australians freely choose to use as therapeutic goods – yet this is what is about to happen with Option 4 (and possibly Option 3) unless YOU do something about it.

There's a deadline, so – be quick!

The deadline for all submissions is Friday, 12th May. Following this, you will no longer have the opportunity to comment or express your concern. You must act NOW to protect your access so start typing!

No matter if your submission is short and sweet or long and detailed, it must be in by the above deadline.

Resources for a better understanding

- Watch the 8-minute video: [The Australian Report – an in-depth analysis](#) to understand the problems with the NHRMC Report
- Read the [Executive Summary: Complaint to the Commonwealth Ombudsman regarding the National Health and Medical Research Council \(NHMRC\) assessment of homeopathy, 2010- 2015](#)

Many submissions submitted by multiple organisations/individuals used variations of the wording in the above template separately.