

Submission 6: Submitted by multiple organisations/individuals separately

POSSIBLE ISSUES RAISED IN RELATION THE HOMEOPATHIC CONSULTATION

RE: TGA Consultation on Homeopathics

In regard to Practitioners:

- Homeopathic Medicine is a Traditional medicine used worldwide recognized by World Health Organisation. On that basis alone it should be recognized as a therapeutic option for health care practitioners. Under no circumstances should Homeopathy be removed as a therapeutic option for practitioners.
- The TGA has the ability and discretion to recognize Traditional forms of medicine and not just evidence based therefore it should continue to do so in the case of Homeopathy.
- In a similar culture -New Zealand Natural Medicine Practitioners have a special provision which includes Homeopathic medicines where they are able to supply any Homeopathic medicine as long as it is not a prescription medicine, restricted medicine or pharmacy only medicine as long as it is in response to a consultation. No regulatory notification is required. This is a reasonable system for Natural Medicine Practitioners in Australia in regard to low risk medicines. It should be afforded to practitioners, to maintain the tools of their occupation.

In regard to evidence:

- The NHMRC report set a higher standard to Homeopathy than the TGA currently use to assess efficacy and will use in the future to assess efficacy and therefore should not have been mentioned in this consultation paper as it is not relevant.
- The UK government review cited in consultation paper was rejected by the UK Govt. and therefore should not have been mentioned to imply validity to its unaccepted conclusion.
- There was a Swiss Report on Homeopathy which stated “There is sufficient evidence for the preclinical effectiveness and the clinical efficacy of homeopathy and for its safety and economy compared with conventional treatment.”—Why was this not included in the recommendations to give perspective and balance?

In regard to options:

- **Option 2:** requiring scientific evidence for higher therapeutic claims will be captured in the new guidelines and should be considered.
- **Option 3:** of exemption is completely valid if it allows for continued use of Homeopathics for practitioners and recognition of its Worldwide Traditional use as a medicine by practitioners.
- **Option 4:** Does not recognize the use and continued endorsement of Homeopathy by governments worldwide. It is out of step with regulatory frameworks worldwide and at a minimum it should include the New Zealand Practitioner “style” special provision for the use of Homeopathics as a therapy option.

- **8 submissions were received using the template above or variations of this template.**
- **8 organisations/individuals selected a publishing restriction:**
 - 5 selected “Publish my submission only on the TGA website, do not publish my name or work title”
 - 2 selected “Do not publish my name or work title or my submission on the TGA website”
 - 1 did not select any publishing option or include a cover letter.
- **No organisations/individuals indicated that their submissions could be published on the TGA website, including their name and work title as it appears on their submission.**