

## Submission 7: Submitted by multiple organisations/individuals separately

### SUBMISSION IN RELATION TO THE TGA HOMEOPATHIC CONSULTATION

Homeopathic Medicine is a Traditional medicine used worldwide recognized by the 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.

Points I wish to raise 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. Therefore the NHMRC report should not have been mentioned in this consultation paper as it is not relevant.
- The UK government review cited in the consultation paper was rejected by the UK Govt. and therefore should not have been mentioned to imply validity to its unaccepted conclusion.
- Why was a Swiss Report on Homeopathy which states “There is sufficient evidence for the preclinical effectiveness and the clinical efficacy of homeopathy and for its safety and economy compared with conventional treatment” not included in the recommendations? This would have given better perspective and balance?

In conclusion, any consideration of the TGA to review the status of homeopathy should wait until after the Commonwealth Ombudsman’s Review. This would be fair and in the best interest for the general public, Health Professionals, manufacturers, others. Why the hurry?

I agree with: **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.

I disagree with: **Option 3 & 4** – I therefore urge TGA not to adopt either of these

- **7 submissions were received using the template above or minor variations of this template.**
- **6 organisations/individuals selected a publishing restriction:**
  - 4 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 organisation/individual indicated that their submissions could be published on the TGA website, including their name and work title as it appears on their submission.**