

Dear Sir/Madam,

My name is Nadine Teffaha. I am a homeopathic health care service provider. I would like to forward here my submission in regards to the TGA Consultation: Options for the future regulation of “low risk” products [Version 1.0, March 2017].

I **support** options 1 and 2 of the consultation:

Option 1 - Maintain the status quo regulation of homoeopathic products

Option 2 – Serious therapeutic claims must be supported by scientific evidence.

And,

I **oppose** options 3 & 4 of the consultation:

Option 3 – Exemption from listing in the ARTG and/or GMP

Option 4 – Declare homeopathic products not to be therapeutic goods

I would like to highlight the reasons behind my choice for the TGA maintaining the status quo regulation of homeopathic products.

I have been a professional registered homeopath for the last 9 years and a consumer of homeopathic products for the last 25 years. I also teach homeopathy and supervise a homeopathic student clinic at a nationally accredited college. Throughout my experience with homeopathic remedies and products in general, both as professional and as a consumer, I have witnessed clinically and empirically their low-risk nature, their effectiveness in relieving the symptoms of a wide range of health conditions and their success in supporting the overall state of health and sense of wellbeing.

Homeopathic health care and homeopathic remedies have been available to the Australian community since their introduction in Australia in the 1830's (Armstrong, 2017).

Several recent studies have shown that there is a significant number of the Australian population who use homeopathic remedies, which are either prescribed by a homeopathic health care practitioner or obtained by purchasing them over the counter. (Xue et al, 2007; MacLennan, Myers & Taylor, 2006; Thomson, Jones, Browne & Leslie, 2014). Members of the Australian public resort to homeopathy (used solely or in conjunction with conventional medical treatment) for the management of their chronic illness and to enhance their general health and wellbeing (Thomson, Jones, Browne & Leslie, 2014)

In addition, complementary medicines which include homeopathic medicines contribute significantly to the economy and to the Australian market growth. The Complementary Health Care Council of Australia (2014) states:

“Complementary medicines and natural healthcare products include vitamins, mineral and nutritional supplements, special purpose foods, herbal and homeopathic medicines, aromatherapy products, and natural

cosmetics using herbals and botanicals. The term ‘complementary medicines’ also comprises traditional medicines, including Traditional Chinese Medicines, Ayurvedic, and Australian Indigenous medicines.

The Australian National Audit Office estimates that market growth has been around 3-12 per cent per year, and today the industry directly generates around 5,000 highly-skilled manufacturing jobs. There are more than 250 individual complementary medicine companies in Australia, with 59 Therapeutic Goods Administration (TGA) approved manufacturing facilities around the country. Combined, these companies generate around \$2 billion in annual revenues.”

The World Health Organisation has released a publication in 2013 titled “WHO Traditional Medicine Strategy 2014-2023”. The objective of this publication is to assist “*health care leaders to develop solutions that contribute to a broader vision of improved health and patient autonomy*” (WHO, 2013, p.8). WHO acknowledges that the demand for traditional and complementary medicine (T&CM) is increasing globally. Furthermore, WHO highlights that homeopathic health care practitioners are valued for their contributions to supporting the health of members of their respective local communities, and, gives examples of such homeopathic health care practitioners in countries like India, France, Belgium, Switzerland and the Eastern Mediterranean region where homeopathy is incorporated into the national health service of most of these countries. (WHO, 2013)

The regulation of homeopathic remedies by the TGA (Therapeutic Goods Administration, 2016) is an immense advantage, as it ensures that the industry provides the best quality homeopathic health products to the Australian population.

As a homeopathic health care provider, I will continually support the TGA in its endeavours to regulate homeopathic remedies. It will be a great loss to witness the TGA withdrawing its support to homeopathy by rendering homeopathic remedies non-therapeutic goods. This will not only affect the homeopathic health care sector which includes health care practitioners who prescribe homeopathic remedies, homeopathic pharmacies and a large number of retail suppliers of homeopathic remedies; This action will also affect the Australian consumer who is benefiting from easy access to homeopathic health care and homeopathic therapeutic products that are currently well regulated by the TGA.

Thank you very much for considering my submission.

With kind regards,

Nadine

References

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