

## TGA Reform to Complementary Medicines Assessment Submission

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My concerns with this is that nearly all complimentary “medicines” have very little evidence for any effectiveness. And especially homeopathy.

Also recent research in Australia and the US has shown that a large percentage of these products are adulterated with toxic materials or even non CAM material that is not disclosed. This is an absolute scandal that the TGA has made no response to and for which it should be deeply ashamed.

I have personally spent quite sometime looking for reasonable evidence and it is thin on the ground.

In the last year as a response to ads by Swisse that their products were based on science I contacted them and after a number of exchanges they came up with one very poor study. They also claimed that the TGA supported this claim (even after I quoted from the TGA page that they did nothing of the kind).

Similar comments can be made regarding most “natural therapies”.

The listing or any other TGA mandated support of CM is a considerable misleading of the public and should not occur unless the applicant can supply a large amount of reliable, reproducible peer reviewed research.

As I understand it currently a large number of products do not meet even the low standard of evidentiary support called for now and that the TGA checking of this is at a low level.

Given this is a multi million dollar industry this poor level of support for what are often major claims is completely unacceptable. Millions of Australians are being mislead and losing considerable amounts of money for little or no benefit and the TGA is complicit in this under the current legislation and its implementation.

I fear that the current proposed changes will do nothing to solve these problems.

You need to have mechanisms that robustly and completely challenge all claims against robust consistent and reproducible research. This is after all the basic definition of science that most CAMs claim is behind their product.