

Submission 5: Submitted by multiple organisations/individuals separately

ISSUES RAISED BY INDUSTRY BODIES IN RELATION THE HOMEOPATHIC CONSULTATION

RE: TGA Consultation on Homeopathics

- 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. Under no circumstances should Homeopathy be removed as a therapeutic option.
- 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.
- 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 misleading and not relevant.
- The NHMRC report is subject to a complaint to the Ombudsman and therefore should not have been cited in this consultation paper.
- 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?
- **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 with low level claims and recognition of its Worldwide Traditional use as a medicine.
- **Option 4:** Does not recognize the use and continued endorsement of Homeopathy by governments worldwide. It is out of step with regulatory frameworks worldwide.

- **80 submissions were received using the template above or minor variations of this template.**
- **69 organisations/individuals selected a publishing restriction:**
 - 45 selected "Publish my submission only on the TGA website, do not publish my name or work title"
 - 19 selected "Do not publish my name or work title or my submission on the TGA website"
 - 2 selected "Only publish my name and work title on the TGA website, do not publish my submission"
 - 1 selected "Only publish some of my submission on the TGA website"
 - 2 did not select any publishing option or include a cover letter.
- **11 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.**