

**Review of Pharmacy Remuneration and Regulation**  
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Review Secretariat

Review of Pharmacy Remuneration and Regulation

The Australian Government Department of Health

Dear Professor King, Bill Scott and Jo Watson,

I wish to make a submission to the Pharmacy Remuneration & Regulation Interim Report expressing my strong rejection of the proposed option (Option 3-4) for homoeopathic products not to be sold in PBS-approved pharmacies.

This option directly contradicts the basic criteria of the Review's strategic vision: that is, it is not 'forward-looking', does not 'encourage innovation' and it is inconsistent with 'adapting to the changing needs of the Australian public' - who want greater access to medicines of their choice, not less.

I, along with millions of people worldwide have used homoeopathic medicines for myself and my family with great benefit. Homoeopathic products have been available in pharmacies for years without any evidence that they create 'risk of harm to patient health': a view based on speculation, not evidence. These medicines are available alongside pharmaceutical drugs that do have harmful side effects and those drugs that would not pass independent safety studies.

Australians are discerning people who spend their money wisely. Around a million Australian use homoeopathy, not by error of judgment but because they (like me) find that it works. A healthy democracy protects the rights of citizens to choose and access the healthcare and medicines they want - that's what a free and healthy society does.

Re the NHMRC review,

Serious issues associated with the NHMRC Homeopathy Review include:

- The NHMRC Homeopathy Review is currently subject to a multi-stakeholder Complaint referred to the Commonwealth Ombudsman for maladministration and scientific misconduct - therefore it cannot be used to inform health policy.
- The NHMRC misinformed the community that it 'rigorously assessed over 1800 papers', whereas only 176 studies were looked at (the rest ignored) - i.e. less than 10% of the evidence was actually assessed.
- NHMRC informed the public that it used 'standardized, accepted methods' when it didn't.
- NHMRC conducted the review twice, sacking a first reviewer in 2012 who conducted a high quality review (as confirmed through Freedom of Information documents). The first reviewer was a principal author of NHMRC's own guidelines on how to review health evidence.
- NHMRC hid the existence of the first review, its findings and public expenditure.
- The research protocol for the second (published) Review was reinvented after the contractor (Optum) had already completed the assessment. This involved the retrospective creation and

application of arbitrary criteria, which directly resulted in the results of 171 out of the 176 studies (97%) being dismissed (outright) from any consideration in the NHMRC Review's findings.

- All the criteria that underpinned the published findings were developed post-hoc, without any of the changes to the research protocol being disclosed or justified
- NHMRC conducted a sham public consultation process, where none of any additional evidence submitted was included in the Overview and a member of a leading anti-homoeopathy lobby group (Friends of Science in Medicine) was contracted to consider it.
- NHMRC excluded any homoeopathy subject/ research experts from the process - in breach of mandatory NHMRC standards.
- The Review was tainted by multiple conflicts of interest which NHMRC did not report or manage - in breach of Conflicts of interest guidelines and legislation. Extremist groups in this way were allowed to impose their warped view for their own vested aims to influence the outcome. The ramifications for the public is to further remove choice and rights, by means of misusing the system to drive dictatorial, senseless, tyrannical, oppressive descent for Australia. Supporters of anti-homoeopathy lobby groups were also appointed as the first Chair of the working committee, as a contractor in 2014 to assess additional submitted evidence and found throughout NHMRC Council and Health Care Committee.
- Developing Options on the basis of a flawed NHMRC Review, without any consideration of broader (positive) research that the NHMRC did not consider, unjustly perpetuates further damage to the homoeopathy sector on the basis of maladministration.
- NHMRC excluded any homoeopathy subject/ research experts from the process - in breach of mandatory NHMRC standards. How acceptable would it be for a team of anti-medical drug panelists to oversee the review of medical drug safety evidence? Stringent measures applied to the safety of all drugs, vaccines, surgical procedures and diagnostic therapies as is advocated to traditional systems.