



15 July 2017

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 actually want greater access to medicines of their choice, not less.

I have used homoeopathic medicines for myself and my family with great benefit since 1943. 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. In fact, there is not one proven case of death or serious injury caused by any homeopathic medicine prescribed by a properly qualified practitioner or sold over the counter. In contrast, many OTC pharmaceutical drugs have been shown to cause harm.

Australians are discerning people who spend their money wisely. Around a million Australians 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.

As a child, I was successfully treated with homeopathic medicine for chicken pox, measles, scarlet fever and asthma. My siblings were also successfully treated for a similar range of disorders. As a parent, I used a carefully chosen combination of Western Allopathic Medicine (WAM) and Complementary/Alternative Medicine (CAM), including homeopathy. There were no adverse effects from CAM (including homeopathy) while both my children suffered significant adverse effects from their WAM treatment prescribed by highly qualified doctors. It is ludicrous to suggest that the Australian Public should have greater access to potentially harmful pharmaceutical medicines but be deprived of access to effective, proven and harmless homeopathic medicine.

After being diagnosed with stage 4 Parkinson's disease in 1995, I used a combination of CAM, including a range of homeopathic remedies and formulas, with the result that I now live without any symptoms of Parkinson's disease. If I had not been able to access homeopathic medicine, I would be, at least, in a nursing home and, probably, dead by now.

In 2015, I was diagnosed with stage 3 bowel cancer, and used a carefully chosen combination of WAM (primarily surgery) and CAM (homeopathics, supplements and Salvestrols), and am recovering better than most. If I could not access CAM, I would be costing the government much more money for my illness care.

Your Review inappropriately cites the NHMRC Homeopathy Review findings which are badly flawed and under challenge. Therefore, citing the NHMRC Review is tantamount to citing statements from your local plumber on electricity safety and efficacy.

I have been in contact with the NHMRC requesting access to the first Homeopathy Review which has been suppressed. An Executive Director of NHMRC has admitted the existence of the first Review, but currently refuses to release it. Insider sources have revealed that the first Review found that Homeopathic Medicine is effective and safe for a wide range of disorders. It is, therefore, critical that you access and peruse this suppressed report before making any recommendations regarding Homeopathic Medicine. Failing to do so would be a failure to rigorously examine all available evidence.

The currently available (second) NHMRC review of homeopathic medicine cannot be used as evidence in developing any policy position because of fatal flaws in its methods and structure. I list some of the flaws below but, in concealing the existence of a first (favourable) review, failing to admit the cost of its production and failing to make the finding public, the NHMRC lied to its employer – the Australian Public. This is a shameful episode in our scientific history.

The NHMRC claimed to have considered 1863 studies in its review. However, this is simply not true. They, in fact, arbitrarily selected 176. Applying the minimum population criteria reduced this to 30, then the quality criteria reduced this to 5. So ONLY 5 STUDIES were included in their review of the most-used form of medicine in the world which is recognised by the World Health Organisation. Further, it is now known that the reviewer(s) did not actually read any of the studies included. NOT ONE.

The NHMRC claimed to have found no evidence of efficacy for 17 disorders, but reviewed only 5 studies. This is simply nonsense.

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 not relevant.

The second review established criteria for study inclusion more onerous than for any other form of medicine, including pharmaceuticals. The NHMRC insisted that any study considered must have a population of at least 150, yet the NHMRC funds studies with

lower populations. The NHMRC insisted that each study considered have a quality factor of 5/5, a condition that most studies cannot reach – even for the most possibly-toxic pharmaceutical. The Cochrane Review states that quality standards of 3, 4 or 5 are suitable for reviews of this sort.

The UK government review cited in consultation paper was rejected by the UK Government 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?

It is time for the Australian Government to step up and be honest with its employers (Australian taxpayers) and show it really cares about health, rather than expensive illness management.

I will be happy to be contacted at my office should you require further discussion.

"All that is necessary for evil to triumph is for good men to do nothing"

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'John C. Coleman', with a long, sweeping underline that extends to the right.

John C. Coleman ND