



14 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 welcome this opportunity to respond to the Pharmacy Remuneration & Regulation Interim Report. The breadth and complexity of the issues you've considered regarding the arrangements that apply to pharmacy, including the changing role of pharmacy with increasing expectations for primary healthcare delivery – such as with the Victorian Government's Supercare Pharmacy initiative – as well as meeting consumer preferences in a digital-first age – is impressive. Developing a coherent view with the diversity of stakeholders you consulted, is a real achievement.

Whilst I support many of the reports recommendations – particularly in relation to improving access and information provision to consumers, as well as digital enablement through ePrescriptions and the eMedications Record – I do wish to **lodge an objection to Option 3-4 for Homeopathic products not to be sold in PBS-approved pharmacies.**

The basis of my objection to this recommendation is below:

(1) Use of the NHMRC report

The main justification given in the interim report for this recommendation is the NHMRC Homeopathy Review. As you may be aware, this review is considered controversial and inconsistent with the findings of other high-quality studies into the efficacy of Homeopathy in certain conditions¹. The process and conduct of NHMRC in the development of this report is currently the focus of a Commonwealth Government Ombudsman investigation after a complaint for maladministration and scientific misconduct was submitted in 2016. Until such time as this is resolved, it is inappropriate to base a major change in policy on a review that could eventually be rescinded, should the complaint be upheld by the Commonwealth Ombudsman's findings.

¹ The Australian report, HRI,
<https://www.hri-research.org/resources/homeopathy-the-debate/the-australian-report-on-homeopathy/>

(2) Safety

The introduction to your recommendation on the sale of Homeopathic medications in pharmacy asserts that “There are unacceptable risks where community pharmacies are allowed to sell homeopathic products”. The argument is derived from a statement in NHMRC’s report ‘People who choose homeopathy may put their health at risk if they reject or delay treatments for which there is good evidence for safety and effectiveness.’ As already mentioned in point (1), the NHMRC review into Homeopathy is under Commonwealth Ombudsman investigation, and should not be drawn upon for the basis of policy change until such time the status of the report is known.

The argument about delaying necessary treatment by using another less appropriate treatment applies to all forms of healthcare, conventional or complementary – and is not unique to Homeopathic medicines. This appears to be an ‘unfair’ singling out of Homeopathic medicines, above all others.

The safe use of Homeopathic medicines purchased through pharmacy can be seen in other jurisdictions. For example, 29% of European citizens access Homeopathic preparations from pharmacies.

Homeopathic medicines are classified as ‘low-risk’ by the TGA. Arguably the risk profile of Homeopathic medicines is much lower than many pharmaceutical preparations which are readily available to consumers not only through pharmacy, but supermarket shelves.

(3) Consumer choice

In your Interim Report, you’ve considered meeting consumer expectations as a key driver for change. In the background to your recommendations for Complementary Medicines in community pharmacy, you cite the research undertaken by Hall & Partners which states (paraphrased here) that ‘consumers want to access these products in pharmacy’. Here, you acknowledge the expectation of consumers is to access complementary medicine via pharmacy, however, by excluding Homeopathic medicines, your recommendation fails to deliver.

With the disruptive consumer-lead ‘technology revolution’, healthcare is undergoing the same changes that other areas of the economy have experienced. Healthcare in this paradigm acknowledges that consumers, empowered with information, must be enabled to make their own healthcare choices. This can result in a more complete healthcare ‘mix’, tailored to a consumer’s personal situation, needs and values. Pharmacy is not immune to this trend. In-fact, it’s an opportunity for pharmacy to assist consumers to engage further with their health.

Whilst I'm encouraged by many of the recommendations the panel has put forth for a strong and contemporary pharmacy sector, the recommendation for Homeopathic medicines appears regressive.

Finally, on a personal note, I have used homeopathic medicines for myself and my family. This has always been done alongside appropriate conventional healthcare. Homeopathic medicines have been available in pharmacies for 200+ years. There has been longstanding access to Homeopathic medicines through pharmacies in Australia, and a major change to their access - based on a single and disputed review - is unacceptable.

Yours sincerely,

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