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Review Secretariat
Review of Pharmacy Remuneration and Regulation
Australian Health Department

Dear Professor King, Bill Scott, and Jo Watson,

I am to invite reference to the Interim Report on “Review of Pharmacy Remuneration and Regulation” (The King Review) wherein it is proposed that Homeopathy and homeopathic products should not be sold in PBS-approved pharmacies¹. While appreciating panel intention of being transparent by inviting feedback on the complex and significant issues contained in the report, following submissions are made:

Although the intended modifications are going to affect mainly Australian community who are using Homoeopathy to manage their day-to-day illnesses, it will be appropriate for us to bring to kind Knowledge of the review committee the state of affairs in other parts of world where Homoeopathy is recognized, practiced and integrated in health care delivery system.

At the outset, I would like to say that the findings and options stated are based on highly biased NHMRC report on Homeopathy wherein the outcome is just based on heterogenous clinical studies published instead of relying on valued experience of patients and several medical practitioners around the world (approx. 500 thousand).

Homoeopathic medicines are being traditionally used for over 200 years in more than 70 countries and prescribed only by qualified medical doctors having optimal knowledge of medical system. Therefore, homoeopathic medicines prescribed by them can never be harmful rather such experience needs to be documented and considered by the review panel.



Further, I would like to also update the panel about Indian scenario of Homoeopathy and Homoeopathic medicines regulations. India is a multicultural society where people of different background use different medicines. There is an evident shift in trend of public's preferences for therapy selection from standard biomedicine to other systems including Homoeopathy that offer holistic and individualised treatment. Here, we have a well-developed ethical and regulatory framework with Homoeopathic medicines covered under the provisions of Drugs & Cosmetic Act, 1940 and defined under Rule 2(DD) of Drugs and Cosmetics Rules, 1945. Standards of homoeopathic medicines to be complied for manufacture, sale, distribution or import are defined under Second Schedule of the Drugs and Cosmetics Act (item N.4a), import of new homoeopathic medicine under Rule 30AA and Packing and Labelling of Homoeopathic medicine under rule 32 (A).ⁱⁱ

Homeopathic medicines are currently prescribed by about 295 thousand registered practitioners in India and millions of patients are being treated with success. Also, there are 195 medical colleges imparting under-graduation and 41 imparting post-graduation level education & training in Homoeopathy.

World Integrated Medicine Forum, a unique international forum on 'Regulation of Homeopathic Medicinal Products: National and Global strategies' was organised on 23-24 February 2017 in New Delhi, India. The forum included 50 delegates from 250 countries to discuss the current state of regulation of homoeopathic medicinal products (HMPs). The stakeholders in attendance included drug regulators, manufacturers, pharmacopoeia organizations, pharmacists, and healthcare providers worldwide. The panelists of the forum, which included regional WHO representatives as well made rigorous discussions and deliberations on several issues involving regulators and manufacturers perspective. The key recommendations of the forum were harmonization, or at least, collaboration, convergence and reliance on regulations of HMPs, encouraging Good Manufacturing Practices, finding ways to evaluate and compare points of convergence and divergence across various countries, in terms of: HMP regulations, pharmacopoeias and industry standards etc. The detailed report of the forum is available online at <http://www.ijrh.org/text.asp?2017/11/2/123/207662>.

Australia's population is one of the most culturally and linguistically diverse populations in the world with estimated 27% immigration population. Many of them use Homoeopathic medicinesⁱⁱⁱ. Your report also states that consumers expect access to complementary medicines in their local pharmacy. Homoeopathy being one of the complementary and traditional medicine should not



be counted in isolation. The Australian public should to given option of using Homoeopathic medicine as prescribed by a medical practioners. The public will like to continue using homeopathic medicines and benefit from it, as homeopathy is considered a good medicine by rational medical doctors^{iv}.

I strongly recommend that sale of homoeopathic medicine should not be stopped in PBS-approved pharmacies and be easily available to patients in Australia as in several other countries. If the review committee feels appropriate, undersigned is willing for personal submission before the panel with details.

Yours Sincerely,

(Raj K Manchanda)

ⁱ Review of Pharmacy Remuneration and Regulation. Available from https://consultations.health.gov.au/pbd-pharmacy-review/submissions/supporting_documents/Interim%20Report%20%20Final%2021062017.pdf

ⁱⁱ <http://www.cdsc.nic.in/writereaddata/Drugs&CosmeticAct.pdf>

ⁱⁱⁱ A survey conducted by the Complementary Healthcare Council of Australia, 2008

^{iv} <http://www.bmj.com/content/345/bmj.e6184>