



Liga Medicorum Homoeopathica Internationalis (LMHI)  
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Review Secretariat  
Review of Pharmacy Remuneration and Regulation  
Australian Health Department

Dear Professors King, Scott, and Watson

I am writing in 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 pharmacies<sup>i</sup>. The panel has invited feedback on the complex and significant issues contained in the report.

The Liga Medicorum Homoeopathica Internationalis (LMHI) established in Rotterdam in 1925, represents homeopathic physicians, veterinarians, dentists, and pharmacists in more than 70 countries all over the world. The purpose of the association is the development of homeopathy worldwide and collaboration among licensed medical doctors, medical societies, and others interested in homeopathic medicine. The LMHI is exclusively devoted to non-profit and philanthropic activities<sup>ii</sup>.

After thorough review, of the above-mentioned report, we submit the following clarifications:

Homoeopathy is recognized and practiced traditionally by medical doctors in Central and South America (Brazil, Argentina, Chile, Colombia, Costa Rica, Cuba, Ecuador, Mexico), Asia (India, Pakistan, Sri Lanka) and Europe (Belgium, Bulgaria, Hungary, Lithuania, Portugal, Romania, United Kingdom) either as a distinct medical system or integrated with conventional medicine.

The WHO's (World Health Organization) Global profile of popularity for TCAM therapies highlights Homoeopathy as the most popular medical system in high-income countries and the second most popular in low-income countries<sup>iii</sup>. A recent report by Bundesverband der



Pharmazeutische Industrie e.v (BPI) from Germany<sup>iv</sup>, has declared that: "Homeopathy is a recognized and effective therapy for patients," and expressed its support to Homeopathy. According to this report, it is a "recognized and accepted therapy for the German patients and the first choice for many of them." It further states that this affirmation derives from the results of a poll that such an organization charged the Institute for Social Investigation and Statistical Analysis (FORSA), one of the leaders in the field of research and sociological matters in Germany. According to the results of the study, approximately half of the respondents had taken homeopathy, of which 70% were satisfied or very satisfied with its efficacy and tolerability.

Furthermore, we would also like to state that Homoeopathy is being practiced by qualified and trained professionals around the world and homoeopathic medicines are prescribed based on a patient's particular and individualized condition and symptoms for over two hundred years and there is negligible evidence suggesting it can harm anyone directly and indirectly. Therefore, the statement "*There are unacceptable risks where community pharmacies are allowed to sell homeopathic products.*" is exaggerated and irrational. We are of the view that on the basis of just one report, whose conclusions are being disputed by professional organizations from around the globe an extreme decision of stopping the sale of homeopathic products should not be taken, and considered unwarranted and even prejudicial, considering its worldwide support among consumers.

The use of Homoeopathic medicine has increased worldwide with the rapid expansion of the global market. The Homeopathic medicines are being sold as either OTC medicines or prescription only medicine. For reasons of safety and quality of homoeopathic medicines, the WHO developed a document on 'safety issues in the preparation of homoeopathic medicines'<sup>v</sup>, detailing the technical aspects of the production and manufacture of homoeopathic medicines to assure their safety, and quality standards, and provide specifications for the marketing of homoeopathic medicines. All the member states and stakeholders are now following this directive and working towards a well-defined regulatory framework in different regions around the world. Recently, a unique international forum on 'Regulation of Homeopathic Medicinal Products: National and Global strategies' was held on 23-24 February 2017 in New Delhi, India. This forum had representation from regulators, drug manufacturers, and pharmacopoeia experts, from 24 countries, as well as from representatives from the WHO. The panellists at the



forum, , recommended that, given the worldwide use of homeopathy, harmonisation, or at least, collaboration, convergence and reliance on regulations of HMPs, is required, for the best interest of the public, the ultimate beneficiaries of this system of medicine. The forum also hoped that better HMPs regulations would mean a more organised and scientific growth of the homeopathic industry. The detailed report with recommendations is available online at <http://www.ijrh.org/text.asp?2017/11/2/123/207662>

Therefore, we are of the view that your esteemed body should not implement the Option 3-4 of the Kings Review report and support the Australian public in their voluntary pursuit of individualized, person-centered and beneficial care with Homoeopathy. Otherwise, such decision could lead to market of only conventional pharmacological products, which would curb the beneficial harmony of traditional and western medicines.

Yours Sincerely,

Dr. Alok Pareek

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<sup>i</sup> 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](https://consultations.health.gov.au/pbd-pharmacy-review/submissions/supporting_documents/Interim%20Report%20%20Final%2021062017.pdf)

<sup>ii</sup> <http://www.lmhi.org/>

<sup>iii</sup> Ong CK, Bodeker G, Grundy C, Burford G, Shein K. WHO Global Atlas of Traditional, Complementary and Alternative Medicine. Map Volume. Kobe, Japan: WHO; 2005. p. 63.

<sup>iv</sup> <http://www.bpi.de/home/nachrichten/nachrichten/patienten-vertrauen-homoeopathischen-arzneimitteln/>

<sup>v</sup> World Health Organisation. Safety issues in the preparation of homeopathic medicines. 2009