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## **NHMRC Evidence on the effectiveness of homeopathy for treating health conditions**

The CHC writes to you directly as Chair of Council of the National Health and Medical Research Council (NHMRC) to express our concern regarding the publication of a draft information paper "*Evidence on the effectiveness of homeopathy for treating health conditions*", dated April 2014.

This document is currently 'open for feedback', however, the NHMRC consultation webpage details this feedback must be in relation to the three questions stipulated in the paper, these being mainly around consumer usability of the document, and if additional evidence of effectiveness of homeopathy for the treatment of clinical conditions is required, this must also meet certain evidence criteria outlined in the paper. Given that any aspects considered 'outside the scope' of the public consultation will not be considered we are deeply and rightly concerned that the scope of the feedback is highly restricted and will once again play into the hands of the critics.

The Questions posed by the NHMRC homeopathy draft information paper for feedback are:

Question 1. Is the draft Information paper presented and written in a manner that is easy to understand?

Question 2. Does the draft Information paper clearly outline how the evidence was reviewed and interpreted by the Homeopathy Working Committee?

Question 3. Is there additional evidence on the effectiveness of homeopathy for the treatment of clinical conditions in humans that needs to be considered?

These questions do little to address the major shortcomings in the Information Paper. The Complementary Medicines Industry is suitably outraged that any comments outside the 3 very narrow questions posed will not be taken into account. In this context the CHC will aim to address its response accordingly.

Question 1. Is the draft Information paper presented and written in a manner that is easy to understand?

Unfortunately the Information Paper on Homeopathy tells us more about how the NHMRC interprets research rather than the efficacy of Homeopathy narrowly defined in the context of 'clinical conditions'. Homeopathy is used for health more broadly than those areas directly considered a 'clinical condition'. The CHC recommends that the overall findings of the review statement should be amended to extrapolate on statements the NHMRC has made in the report. We suggest the overall findings should be amended to include for example, "that some studies show homeopathic treatments to be effective for certain conditions, however some of these studies were considered to have been conducted on a too small a scale and would need to be repeated on a larger scale for further confirmation of findings".

Although sceptics often dismiss observational studies, papers in respected conventional medical journals, such as the New England Journal of Medicine, have shown that well

designed cohort or case-controlled observational studies do not overestimate treatment effect sizes<sup>1</sup>.

Of a possible 1367 studies to examine the NHMRC only examined 61. As an example of the perceived bias the CHC was extremely surprised that a Homeopathic Study included in a peer reviewed high impact medical journal on acute ankle sprain 'Traumeel' was excluded from the NHMRC review.

In addition, the NHMRC chose to discredit research in favour of homeopathy. For example we point you to the submission by colleagues at The Australian Register of Homoeopaths, which identified:

- 61 trials using individualised homeopathy, 35 were positive for homeopathy, 24 were inconclusive and only 2 were negative.
- 61 using Homeopathic complexes, 31 were positive, 29 inconclusive and 1 negative
- 15 using isopathy, 10 were positive, 4 inconclusive and 1 negative

It is of little surprise that when major respected studies are excluded the NHMRC will conclude; *"For some health conditions, homeopathy was found to be not more effective than placebo."*

By contrast, a Swiss Technology Assessment report on Homeopathy commissioned by the Swiss Government concluded that homeopathy is a "valuable addition to the conventional medical landscape."

The Information Paper on Homeopathy ignores the 3 powerful streams of evidence that support Natural medicine:

1. Peer reviewed scientific evidence that strongly supports areas of natural medicine, which is why so many Universities are teaching this evidenced based medicine;
2. The hundreds of years of use of natural medicine throughout the world; and
3. The ever expanding and growing popularity of natural medicine throughout Australia today.

Unfortunately, given the narrow scope of the information paper, questions such as these fundamental points will not be taken into consideration. Instead we believe that once feedback closes, detractors such as Friends of Science in Medline will be given another media opportunity to denounce homeopathy.

Question 2. Does the draft Information paper clearly outline how the evidence was reviewed and interpreted by the Homeopathy Working Committee?

The CHC submits that the Information Paper does not attempt to explain to the consumer the inherent risk of bias involved in carrying out a systematic review of a systematic review. Unfortunately, the consumer will read that for each condition, "the research group collated the findings of the systematic reviews and assessed the quality and reliability of the evidence". This does not explain, from the description of the methodology, that this is open to a great level of interpretation.

The NHMRC has previously published it's draft opinion on homeopathy stating: "NHMRC's position is this it is unethical for health practitioners to treat patients using homeopathy, for

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<sup>1</sup> Gold.PW, Novella, S., Roy, R., Marcus, D., Bell, I., Davidovitch, N., Saine, A. (2008). Homeopathy—quackery or a key to the future of medicine? Homeopathy 97, 28–33

reasons that homeopathy (as a medicine or procedure) has been shown not to be efficacious” (Australian Doctor, 2011). An explanation is needed in the Information Paper as to how a truly independent analysis of the information was carried out in light of this perceived bias.

### **A fairer test of Homeopathy**

Randomised controlled trials and the meta-analyses based on them show mixed findings but raise significant concerns with their methodology. In addition, the basic assumptions of controlled, blinded research inherently contradicts the whole-person, individual approach of homeopathy. Alternative health care practitioners believe it is important to explore how a person has become ill, as well as the known stressors in their lives, especially those that have led up to illness.

Both Linde et al’s famous positive meta-analysis and Shang et al negative meta-analysis, published in the Lancet in 1997 and 2005 respectively, have the same issue of pooling studies of all types of practice involving homeopathy remedies across all types of clinical conditions.<sup>2</sup>

A fairer test of homeopathy needs to consider that homeopaths aim to alter the long-term trajectory of the person’s illness towards fewer, shorter, and less severe illness flares and not necessarily to suppress the symptoms of a specific disease at a given point in time.

High-quality clinical trials should measure not only the short-term disease endpoints and quality of life as required for conventional medical research, but also overall health outcomes for a given person over time as predicted for homeopathic clinical research. Quality of life assessment and other patient centred measures, for example, may be at least as important as the measurement of biochemical markers or other physical determinants of health status.

To truly show that homeopathy enables people to attain better health, it is important that it achieves much wider respect within medicine at large. To do this, homeopathy must convince sceptics ‘by rigorous research evidence’ of its clinical effectiveness.<sup>3</sup>

The CHC wishes to clarify the next steps in the ‘consultation process’ to this Information Paper. It is suggested that all submissions to this paper are made public documents, where indicated, and that in response a log of changes to the Information Paper be provided where the Homeopathy Working Committee has considered the changes as appropriate.

In a related transparency matter we note public submissions have not been posted in relation to the recent consultation on the ‘complementary and alternative medicine resources for clinicians’, which closed on the 13 September 2013 and to which the CHC submitted a comprehensive response. The NHMRC published on the 9 April the document ‘Talking with your patients about Complementary Medicine – a Resource for Clinicians’, however public submissions to this document were not published to the website. For the purpose of transparency, where applicants have provided permission for their submissions to be published and they are within the scope of the NHMRC consultation review, these documents should be made publically available.

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<sup>2</sup> Gold.PW, Novella, S., Roy, R., Marcus, D., Bell, I., Davidovitch, N., Saine, A. (2008). Homeopathy—quackery or a key to the future of medicine? *Homeopathy* 97, 28–33

<sup>3</sup> Mathie, R.T. (2003). The research evidence base for homeopathy: a fresh assessment of the literature *Homeopathy* 92, 84–91

Finally, we express concern over the timing of the release of the Information Paper. The Paper was released just one day before the launch of Homeopathic Awareness Week, and the media and airwaves were bombarded with critics seemingly already briefed on the report. The NHMRC should be the beacon for the highest standards in scientific research, and instead could be considered to be open to influence of bias.

The NHMRC may conclude that based on its interpretation of this currently limited study scope that there remains unanswered questions around homeopathy from a scientific evidence base. However, homeopathy is used by tens of millions of people around the world and will remain popular despite the prejudices against it. The CHC would urge that government funding is invested into rigorous research to support the potential for complementary medicines in the prevention of illness and support and maintenance of health and wellbeing. Homeopathy is intended to complement modern medicine. It is up to people to choose which they prefer to use, when and for which ailment.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Gibson', with a stylized flourish at the end.

**Carl Gibson**  
Chief Executive Officer  
Complementary Healthcare Council