Response to Consultation on Professional Guidance for Pharmacists in Northern Ireland on the provision of homeopathic products within a pharmacy

1. Background
   Sense About Science is a UK registered charity that works to equip people to make sense of science and evidence. We work with over 4,000 scientists, from Nobel Prize winners to our Voice of Young Science network of postdoctoral researchers, to help civic groups including community organisations, media and commentators to weigh up claims about evidence.

2. We welcome the initiative of the Pharmaceutical Society of Northern Ireland to produce a guidance to ensure that pharmacists are clear on what is the best practice approach when responding to patient questions about homeopathy. We understand this guidance was prompted by the recommendations from the House of Commons Science and Technology Committee report Evidence Check: Homeopathy, to which we also submitted evidence, and are encouraged to see the Pharmaceutical Society of Northern Ireland reacting to these recommendations.

3.1 Public perception of homeopathy
   We monitor public discussions, together with our own log of requests for help and concerns raised by scientists, to identify frequently occurring misconceptions or misleading information. In 2006 we reviewed discussion about homeopathy and made two observations:
   a) That it was believed to contain an active ingredient, and was often confused with herbal medicine (and, related to this, that people were often unaware of the mystical belief in water memory and in ‘like cures like’ on which it is based).
   b) That because it was supplied on the National Health Service, it was assumed that it ‘must be effective’ and ‘there must be something in it’.

3.2 We also noted regular reports of homeopathic remedies being marketed for serious diseases, notably at that time anti-malarial prophylaxis. We assessed this to be in part a consequence of the assumptions a) and b) above.

3.3 We noted, through discussions held with clinicians and researchers, that there was an atmosphere of resigned frustration about the possibility of addressing the misconception that homeopathic products contain active ingredients and the misconception that there was reliable evidence of efficacy beyond the placebo effect. In particular they found it hard to argue against something that was supplied through the NHS and that appeared to be officially endorsed. We also noted their frustration about the acclaimed ‘holistic’ approach of homeopathy despite its inability to diagnose disease and the potentially dangerous consequences of that. Furthermore, if the use of some unproven and unlikely remedies is officially flattered and endorsed, then this affects our ability to reason through debates about the suitability or provision of any other remedy. In other words, one cannot demand that people accept the evidence regarding the provision of drugs for Alzheimer’s yet overlook it regarding the provision of homeopathy.
4.1 Sense About Science’s work on public awareness of homeopathy

In July 2006, we worked with experts in malaria and tropical diseases to warn the public that homeopathic medicines offer no protection against malaria or other serious tropical diseases. This followed a short investigation by Sense About Science, which showed that the first ten homeopathic clinics and pharmacies selected from an internet search and consulted were willing to break public health protocols by providing unproven homeopathic pills to protect against malaria and other tropical diseases such as typhoid, dengue fever and yellow fever. In widely report comments, the malaria experts called on the Government to ensure that the safety of the travelling public was not put at risk by such prescriptions. Subsequent action was brought by the Royal Pharmaceutical Society of Great Britain (the pharmacy registration body at that time) against two of the pharmacies investigated. This is ongoing.

4.2 In September 2006, we produced a short public leaflet, Sense About Homeopathy, describing homeopathy in a scientific context and exploring why some people think it works (http://www.senseaboutscience.org.uk/pdf/SenseAboutHomeopathy.pdf).

4.3 In autumn 2006, Sense About Science challenged the Medicines for Human Use (National Rules for Homeopathic Products) Regulations 2006. The new regulations permitted homeopathic products to make medical claims but exempted them from providing scientific evidence that they are effective. This was the first time in its history that the regulation of medicines moved away from science and from clear, meaningful information for the public. What is more, it happened without parliamentary time or public debate. In October 2009, Sense About Science summarised for parliament hundreds of responses protesting the introduction of the regulations, including many from scientific and medical bodies. These were instrumental in pressuring for the debate that was held in the House of Lords on 26th October 2006. The serious concerns of the scientific and medical community were raised by Lord Taverne (Chairman of Sense About Science), Lord Rees of Ludlow (President of the Royal Society), Lord Turnberg, Lord Jenkin of Roding, Lord McColl of Dulwich and Baroness O’Neill of Bengarve. A summary of our objection at that time was:

“The regulations
The mission of the UK’s licensing body, the Medicine and Healthcare products Regulatory Agency (MHRA), is to ensure “that medicines and medical devices work, and are acceptably safe”. However, with the introduction of the new rules for homeopathy, it now accepts homeopathic provings as evidence of efficacy. A ‘proving’ is the method homeopaths use to determine the symptoms a substance causes (with a view to treating diseases with similar symptoms). Provings are not carried out on the finished product and are nothing to do with efficacy.

The regulations also mean that, for the first time in more than 30 years, homeopathic products will be able to make medical claims such as “For the relief of…”. Such claims, however worded, imply efficacy where none has been proven.

The MHRA did not have to change the regulations in this way. It was not required to do so by EC Directive 2001/83. The MHRA set out four options to government, including doing nothing. It chose to eliminate the old, stricter licences in order to facilitate the “expansion of the homeopathic industry” through new products.
The MHRA has designed the regulations to respond to pressure from the homeopathic industry, which wants to expand (see impact assessment right).”

4.4 Our network of early career researchers, Voice of Young Science (VoYS), sent an open letter to the World Health Organisation (WHO) calling on the body to condemn the promotion of homeopathy for treating life threatening diseases after becoming aware of a conference promoting the use of homeopathy in developing countries. They discovered that homeopaths are setting up clinics in these countries and claiming to treat HIV, malaria, TB, influenza and infant diarrhoea. VoYS received comments from directors of WHO disease programmes stating that they do not recommend homeopathy for the treatment of HIV, influenza, TB, Malaria and Infant diarrhoea. These comments have been sent to all health ministers in the world and provide a guideline for governments and health care workers dealing with these issues.

5. On the proposed guidance
As a charity that works to equip people to make sense of science and evidence and through our work on evidence-based medicine, we have campaigned for people to have access to the best available evidence and this includes information about efficacy of drugs.

From our work showing that homeopathy is advised for malaria prophylaxis on some occasions, we agree that this is a risk to health if the public are not given adequate information about homeopathic remedies and pharmacists are best placed to be able to communicate this to the public.

We welcome the proposed PSNI guidance, which states that good practice is to advise people seeking homeopathic products that there is “no scientific or clinical evidence base for the efficacy of homeopathic products, beyond a placebo effect”. We also welcome the recommendations that shelf signage will be put next to homeopathic products encouraging people to seek advice from the pharmacist before purchasing. We think it would also be beneficial for the shelf signage to include the point above that there is “no scientific or clinical evidence base for the efficacy of homeopathic products, beyond a placebo effect.”

1 Homeopathy for Developing Countries, An International Conference in Amersfoort, the Netherlands, 6-7 June 2009. The programme can be found here: www.homeopathycommunity.com/upload/HomeopathySeminar.pdf