

Dear Medicines and Healthcare products Regulatory Agency,

**RE: Consultation on Draft Guidance on Advertising Homeopathic Medicines**

Thank you for asking the Royal Pharmaceutical Society (RPS) to comment on the draft guidance on advertising homeopathic medicines

The RPS is the new professional body for every pharmacist in Great Britain. We are the only body that represents all sectors of pharmacy in Great Britain and currently have 49,000 members. There are approximately 75 pharmacists per parliamentary constituency, working in hospitals, industry, academia, GP practices, primary care trusts and community pharmacies. The RPS leads and supports the development of the pharmacy profession within the context of the public benefit. This includes the advancement of science, practice, education and knowledge in pharmacy. In addition, it promotes the profession's policies and views to a range of external stakeholders in a number of different forums.

Its functions and services include:

**Leadership, representation and advocacy:** promoting the status of the pharmacy profession and ensuring that pharmacy's voice is heard by governments, the media and the public.

**Professional development, education and support:** helping pharmacists to advance their careers through professional advancement, career advice and guidance on good practice.

**Professional networking and publications:** creating a series of communication channels to enable pharmacists to discuss areas of common interest.

The RPS's vision for pharmacy is that pharmacists should be the universally accessible frontline clinical provider of all aspects of pharmaceutical care and be responsible for all aspects of medicines use. Pharmacists aim to be the healthcare professional entrusted by patients to take care of their every pharmaceutical need.

Pharmacists are the experts in medicines – their management, their usage and information about them. Pharmacists can impact at different points on the patient pathway and lead to a reduction in medicines waste, a reduction in unplanned hospital admissions and better medicines adherence resulting in better patient outcomes.

Response to consultation

The RPS is concerned that the public do not understand the principles on which homeopathy is based, or that these principles are completely different to the ones applied when conventional medicines are used. In addition, the public frequently confuse homeopathic with herbal products, most probably because homeopathic products are often derived from herbs and are called by their botanical name, e.g. both herbal and homeopathic products prepared using aloe will be called aloe. Further confusion may result from the fact that a single manufacturer may produce both homeopathic and herbal products.

The RPS believes that the MHRA must make the differences between homeopathic and herbal products very clear to the public so that they can make fully informed choices about whether or not they use a homeopathic product to attempt to relieve certain symptoms or conditions.

Furthermore, to enable an informed choice to be made by a patient regarding the suitability of a homeopathic product, the RPS believes that any advertising (regardless of the media) for any homeopathic product (regardless of its licensing status) or remedy kit needs to include the statements that:

“There is no scientific evidence for homeopathy nor any evidence to support the clinical efficacy of homeopathic products beyond a placebo effect.”

“Homeopathic products should only be used for the treatment of minor, self-limiting conditions, and must never be used for the treatment of serious medical conditions.”

The RPS believes that unless, or until such a time as the efficacy of a homeopathic product can be demonstrated using methodology currently applied to conventional medicines labeling on the homeopathic product should make it very clear that the efficacy of the homeopathic product has not been proven. However recognizing the current National Rules Scheme introduced in 2006, which allows claims based on the traditional homeopathic use of the product, then the following statement should be included on any advertising for any homeopathic product (regardless of its licensing status):

“Any claims of efficacy made for homeopathic products are not based on the same stringent testing requirements applied to conventional medicines.”

The RPS is concerned about the use of the phrase “homeopathic medicines” as the use of the word medicine in relation to a homeopathic product may be viewed by patients as legitimizing homeopathic products as medicines, which they are clearly not.

The RPS believes that if a licensed homeopathic product is available then it should be used in preference to any unlicensed homeopathic products, as there is an assurance of quality and safety associated with the licensing process.

The RPS urges the MHRA when reviewing Product Licences of Right that they critically assess the available evidence supporting the indications for their use and transfer their registration to the Simplified Scheme.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Duggan', with a long horizontal stroke extending to the right.

Dr. Catherine Duggan  
**Director of Professional Development and support**