

Critique of the House of Commons Library briefing notes - 1

Summary

- The views of homeopaths are minimised as being those of only “some homeopaths” when they are actually the views of virtually all the homeopathic organisations.
- It is suggested that homeopaths and patients are being misled because they are being made aware of a previously unrecognised legal issue.
- The “other commentators” have no standing other than as vehement opponents of homeopathy and other CAM therapies, but this is not made clear.
- The views of “other commentators” are presented without any comment on the fact that they are misleading in implying that there is no difference between homeopathic and conventional pharmacological medicines.
- Sections of the Science and Technology Committee report are included, despite the fact that the report has been heavily criticised, and that many of the conclusions presented here were rejected by government.
- No correction is made of the factual errors in the sections quoted from this report, especially of the claims that homeopathic medicines are biologically inactive, and that there is no evidence that homeopathy works beyond the placebo effect.
- The (at best) disingenuous comments of the Chair of the committee are included, but nothing of the government’s response.

Details

The aim of this critique is to point out a number of weaknesses in the briefing by the House of Commons Library which could lead to serious misunderstandings of the facts.[1]

The introduction identifies a disagreement between “some homeopathic practitioners” and “other commentators”, and makes reference to the 2010 Science and Technology Committee report. The nature of these sources needs to be clarified.

“Some homeopaths” includes *virtually all* the homeopathic organisations, not simply the three cited. Their concern is that the proposed Regulations may be the simplification and consolidation of piecemeal legislation over the last 40 years, but these Regulations make it clear that the normal practice as regards the supply of homeopathic medicines has at some point become a contravention of the law. This is what homeopaths are seeking to have addressed. As such they reflect the needs of some six million people in the UK who use homeopathy each year. The BHA/HAT statement quoted is clear and accurate, and it is seriously pejorative to suggest that it is misleading.

A key feature of the “other commentators” is their commitment to attacking homeopathy and other Complementary and Alternative Medicine (CAM). Quackometer articles, such as the one cited, largely depend on invective and ridicule rather than any systematic analysis. The author assumes that homeopathic medicines are merely “sugar pills”, whereas laboratory research has clearly shown these medicines are biologically active.[2] The Nightingale Collaboration has been established for the purpose of “challenging misleading claims in healthcare advertising”, but its attentions have been directed solely at CAM therapies, the first of which was homeopathy.[3]

One of the key issues of concern about these Regulations is indicated by the quotation used from the Nightingale Collaboration, that

“We do not believe that there is any justification for treating homeopathic products any differently to [sic] any other product that makes claims to alleviate, treat or cure any medical condition”.

The Regulations explicitly distinguish between a “homeopathic medicinal product” and all other

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medicines, which are defined as “other than a homeopathic medicinal product”.^[4] The primary differences between homeopathic medicines and all others are

- (a) that the choice of homeopathic medicine in a particular case is defined by the needs of the individual patient, rather than by a generic relationship of a medicine with an abstract “medical condition”; and
- (b) that the preparation of the vast majority of homeopathic medicines renders them non-toxic, whereas the material doses of other medicines pose health risks.

To deny homeopaths access to the specific medicine a patient needs is to prevent them from practising correctly, and so to deny the public proper access to a therapy of their choice. To do so when there is clearly no health-risk is grossly unreasonable. Normal homeopathic practice has requirements very different from conventional pharmacology, and to treat it differently is not to “privilege” it, but to respect those material differences.

The Science and Technology Committee’s report was seriously flawed and has been criticised in detail on several occasions.^[5] As a result, quotation from this report should not be presented uncritically. For example, The committee’s condemnation of “the use of placebo treatments, including homeopathy”, was made despite the fact that it had received evidence (published in peer-reviewed journals) of replicated multi-centre studies indicating that homeopathic medicines are not biologically inert, and so cannot be regarded as placebos.^[6] Indeed, the report utterly failed to mention these objective studies, but instead relied entirely on subjective and unsupported opinions in order to reach conclusions about whether such evidence could exist.^[7]

The second quotation in these notes also requires comment:

- The conclusions expressed in the first paragraph were rejected by government.
- The claim in the second and third paragraphs that “there is no evidence that homeopathy works beyond the placebo effect” is untrue, since there is high quality RCT evidence showing that it works better than placebo.^[8]
- The argument in the fourth paragraph, that “further clinical trials of homeopathy could not be justified” is invalid since it is based on the untrue claim in the previous two paragraphs.
- The argument in the fifth and sixth paragraphs is entirely based on the inaccurate claim that homeopathy is only a placebo treatment.
- The seventh paragraph fails to take into account the completely different approaches to treatment taken by homeopathy and conventional pharmacology (outlined above).
- The eighth and ninth paragraphs simply repeat the erroneous supposition that homeopathic medicines are biologically inactive.

In other words, the whole passage is predicated on the erroneous view that homeopathic medicines are biologically inactive placebos.

The quotation ends with a statement by the Chair of the committee, which is at best disingenuous. The aims of the committee repeatedly changed, ^[9] even to the extent that the Chair could state that “this is not an enquiry into whether homeopathy works or not”, and immediately follow this with the question: “Does the Government have any credible evidence that homeopathy works beyond the placebo effect”.^[10] As has been pointed out, the committee ignored objective evidence and relied on unsupported opinions – an approach always likely to provoke “strong reactions”. Finally, the “community which believes that homeopathy works” comprises 10% of the UK population and hundreds of millions elsewhere in the world.

No explanation is given for failing to include any part of the government’s response.

Conclusion

In conclusion, the House of Commons Library has produced briefing notes which present not only a false view of the facts, but a view vigorously promoted by those opposed to homeopathy.

References

- 1 Oliver Bennett, *Homeopathy and the consolidation of UK medicines legislation*, House of Commons Library standard note, 12 June 2012 at <<http://www.parliament.uk/briefing-papers/SN06350>>.
- 2 'Memorandum submitted by Dr Peter Fisher' (HO 21), House of Commons Science and Technology Committee *Evidence Check 2: Homeopathy*, 2010, pp. Ev 25-26.
- 3 See <<http://www.nightingale-collaboration.org/campaigns/previous-focus-of-the-month.html>>
- 4 *Human Medicines Regulations 2012* Part 6, para. 95 (6) (a) and Part 5 para. 49.
- 5 Earl Baldwin of Bewdley, 'Observations on the report *Evidence Check 2: Homeopathy* by the House of Commons Science and Technology Committee, February 2010', June 2010.
British Homeopathic Association, 6 responses to the *Evidence Check 2: Homeopathy*, 1-3 March 2010 at <http://www.britishhomeopathic.org/media_centre/>.
William Alderson, *Critique of the House of Commons Science and Technology Committee 'Evidence Check 2: Homeopathy'* (Stoke Ferry: Homeopathy: Medicine for the 21st Century, 2010) at <<http://www.hmc21.org/#/cstc-critique/4539135869>>.
William Alderson, 'A Check Without Balance', *Counterfire*, 2010 at <<http://www.hmc21.org/#/check-without-balance/4543591988>>.
- 6 'Memorandum submitted by Dr Peter Fisher' (HO 21), House of Commons Science and Technology Committee *Evidence Check 2: Homeopathy*, 2010, pp. Ev 25-26.
- 7 House of Commons Science and Technology Committee *Evidence Check 2: Homeopathy*, 2010, pp. 16-17.
- 8 See Gudrun Bornhöft and Peter Matthiessen (eds), *Homeopathy in Healthcare – Effectiveness, Appropriateness, Safety, Costs: An HTA report on homeopathy as part of the Swiss Complementary Medicine Evaluation Programme*, trans. from the German by Margaret M Saar (Berlin, Heidelberg, New York: Springer-Verlag, 2011).
See also E. Ernst, & M.H. Pittler, 'Re-analysis of previous meta-analysis of clinical trials of homeopathy', *Journal of Clinical Epidemiology*, 53 (2000), 1188.
- 9 William Alderson, 'A Check Without Balance', *Counterfire*, 2010 at <<http://www.hmc21.org/#/check-without-balance/4543591988>>.
- 10 Q174, House of Commons Science and Technology Committee *Evidence Check 2: Homeopathy*, 2010, p. Ev 64.