

Date: 29 January 2013

Dear Gerald Blee

I mentioned in my email of 10 January 2013 that trustees had expressed some concern that Professor Peter Hylands had been misunderstood by the ASA. They are rather more concerned at the attached comments on his reports which we have received ('Comments on Hylands EC2.pdf' and 'Comments on Hylands HTA.pdf').

It would appear that Professor Hylands has not been entirely accurate in his reports on the EC2 and the HTA, and that he has omitted discussion or even mention of important factors about which the ASA should have been informed if it is to make a judgement based on "available science".

In addition to supplying you with the documents prepared for us, we attach two other documents.

- The first document is the Shang et al. (2005) meta-analysis ('Shang.pdf'), which it has been necessary to quote from in order to comment appropriately on the assessment of the HTA by Professor Hylands. It is provided in case you do not have a copy. It may be useful to you since this is the "substantial review of over 100 placebo controlled trials" mention in EC2. We have not provided a detailed study of this document, but you should be aware that its conclusions were based on only 14 trials (8 'homeopathic' and 6 conventional medical ones), not on the full set of 110 pairs. No proper explanation of the selection process leading to these 14 trials was provided in the published paper, and a detailed study has shown that the selection is highly unusual in producing this weak result for homeopathy, since almost every cut-off point yields a positive result for homeopathy. Appropriate published studies of this meta-analysis can be supplied, the cumulative effect of which invalidates Shang et al.'s conclusion.
- The second document is a 2012 PhD thesis ('Turner.pdf') which deals with many of the issues we have raised about Evidence Based Medicine, the EC2 and what constitutes appropriate evidence. We believe that this offers the ASA an opportunity to consider a thorough and fully independent analysis of these issues, and one which considers the validity of different types of evidence as evidence, rather than the specifics of individual studies or meta-analyses. It also may help to put the alleged controversy into a proper context.

Since much of the ASA's argument depends on the reports by Professor Hylands, and particularly on aspects which do not appear to be reliable, we believe that the ASA may wish to study the material we are sending and reconsider the Draft Recommendation.

Yours sincerely

Jacqueline Mulhallen