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SUMMARY OF KEY ISSUES: DRAFT INFORMATION PAPER ON HOMEOPATHY—PUBLIC CONSULTATION SUBMISSIONS

NHMRC advice on the effectiveness of
homeopathy for treating health conditions

March 2015

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Public submission issue	Homeopathy Working Committee (HWC) Response
<p>NHMRC and HWC are biased towards the conventional medicine and pharmaceutical industry.</p>	<p>It is not in NHMRC's or the HWC's interest to favour conventional medicine as a sector over complementary and alternative medicine.</p> <p>Rather, NHMRC is concerned with public health and with distinguishing effective treatments from ineffective treatments.</p> <p>The approach adopted by NHMRC aims to eliminate bias and additional information has been added to the Information Paper regarding:</p> <ul style="list-style-type: none"> • Transparent processes for translating evidence; • Methodological and expert review; • Public consultation; and • Approval by Council of NHMRC
<p>Clarification needed for approach to considering systematic reviews and randomised controlled trials (RCT) and HWC consideration.</p>	<p>Additional text, illustrating the relationship between systematic reviews/RCTs/health conditions, has been included in the Information Paper.</p>
<p>The list of included primary studies does not appear in the Information Paper.</p>	<p>Information Paper to be amended to:</p> <ul style="list-style-type: none"> • include the number of primary studies included in the systematic reviews (176). • A link to the list of primary studies has been provided in the Information Paper.
<p>Negative interpretation of the abundant evidence for homeopathy.</p>	<p>All submitted and identified papers were assessed in a standardised way and subjected to appraisal, using a recognised, standardised approach.</p> <p>No good-quality, well-designed studies with enough participants for a meaningful result reported either that homeopathy caused greater health improvements than placebo, or caused health improvements equal to those of another treatment.</p>
<p>The use of overviews and the method of assessing the evidence is a limitation.</p>	<p>The Information Paper has been amended to clarify that the systematic reviews were used to identify the body of evidence which the HWC then considered further.</p> <p>In addition there is a section on limitations in the Information Paper, which discusses the potential limitations of the assessment of the evidence.</p>
<p>Potential bias in reporting of clinical studies.</p>	<p>The potential for bias including publication bias and outcome reporting bias is an important issue when assessing effectiveness of a treatment. The Information Paper has been amended to:</p> <ul style="list-style-type: none"> • explain the risk of publication bias (i.e. only favourable studies published) and that the best way to avoid this bias is for all trials (for both conventional and complementary and alternative medicines) to be registered and results made available; • state the types of potential bias for clinical studies of any medicine; and • note that the review took these into account when assessing the evidence on homeopathy.

Public submission issue	Homeopathy Working Committee (HWC) Response
Recent studies on homeopathy have not been considered.	<p>The Overview Report examined systematic reviews that were undertaken between January 1997 and January 2013 (however, many of the studies considered by the individual systematic reviews may have been older).</p> <p>The public consultation process provided the opportunity for any studies published outside of the systematic review dates to be identified and considered.</p>
Definition of study <i>quality</i>	The <i>Criteria for the development of evidence statements</i> has been included as an Appendix in the Information Paper to provide clarity.
Why was the safety of homeopathy not considered?	The focus of the evidence assessment was on the effectiveness of homeopathic medicines, not the safety of these medicines. However, if systematic reviews presented safety data, this was included.
A previous 'leaked document' is evidence that NHMRC had reached a foregone conclusion.	This current work is based on an assessment of the evidence and has no relationship to the previous draft statement.
Personnel from OptumInsight who undertook the assessment of the evidence are not identified, which is not consistent with the <i>Cochrane Handbook of Systematic Reviews of Interventions</i> .	<p>OptumInsight did not record individual staff members who undertook the assessment of the evidence, however, under the terms of the contract between OptumInsight and NHMRC, there are explicit obligations regarding the reporting of conflicts of interest.</p> <p>For further information please see FAQ document www.nhmrc.gov.au/guidelines-publications/cam02.</p>
HWC disclosures of interest not provided.	The Information Paper has a link to the HWC's disclosures of interest, on the NHMRC website.
The overall conclusion of the Information Paper should be stated more clearly using simpler language	Information Paper has been edited to include simpler language.
Comments relating to editing suggestions for the Overview Report.	Out of Scope of public consultation.
Definition/Distinction between complementary and alternative medicine (CAM), and complementary medicine.	<p>The Information Paper includes a definition of complementary and alternative medicine (see Definition of special terms).</p> <p>NHMRC has other resources that discuss complementary medicine see www.nhmrc.gov.au/your-health/complementary-medicines/talking-your-patients-about-complementary-medicine-resource-clin</p>
Comments regarding the Department of Health's Natural Therapies Review	<p>The HWC/NHMRC are not able to comment on the Department of Health's Natural Therapies Review. Any submissions made to the Department for that review have not been considered as part of NHMRCs review of homeopathy as these are separate processes.</p> <p>The public consultation process for NHMRCs review of homeopathy afforded stakeholders the opportunity to comment/provide additional evidence for NHMRCs review.</p> <p>The assessment of the evidence on homeopathy has been provided to the Department of Health for its consideration.</p>
Queries on the proportion of health spending on homeopathy.	There is no reliable estimate of Australian spending on homeopathy and the Information Paper has been amended accordingly.
Poor quality of homeopathy research	Noted in Information Paper.

Public submission issue	Homeopathy Working Committee (HWC) Response
The Information Paper should include a call for more research.	NHMRC funds investigator initiated research selected via a competitive peer review basis. To date NHMRC has not received any applications for funding regarding the use of homeopathy for the treatment of clinical conditions.
Requires an executive summary	Executive summary has been included in Information Paper.