Spanish AEMPS Homeopathy Report Misrepresents the Scientific Evidence

A new report[1] by the Spanish Agency for Medicines and Health Products (AEMPS) was commissioned as part of the government's #CoNprueba programme[2], explicitly designed to "dismantle" pseudo-therapies. Production of the report was also overseen by Minister of Health – Mónica García – who publicly described homeopathy as "a scam"[3] in October 2024. This context raises legitimate concerns about whether the report was designed to reach a predetermined conclusion. Analysis of the report shows that concerns of bias are well-founded: this low-quality report presents a fundamentally distorted picture of the available scientific evidence, and the AEMPS's public claim that there is "no scientific evidence" of efficacy of homeopathy for any condition[4] is not supported by the results of their report.

The report misrepresents its own findings

The AEMPS report assessed 64 systematic reviews and concluded, in its own Summary of Findings, that "**the evidence is insufficient to make a treatment recommendation with homeopathic products** in any pathology." This inconclusive result — that some evidence exists, but not enough to make a clinical recommendation – was publicly communicated as a finding of "no evidence" whatsoever. Inaccurately reporting insufficient evidence as no evidence misleads both policy-makers and the public.

Unsubstantiated claims are presented as established fact

The report makes three assertions that are scientifically unjustifiable:

- It states that homeopathic products perform no better than placebo, yet **no reference is provided to support this claim** and the report fails to accurately report on peer-reviewed systematic reviews which found evidence of beneficial effects beyond placebo.[5,6]

- The report describes a trend — that homeopathic effect sizes diminish as study quality increases — as a "well-known empirical fact" yet **the study cited to support this claim directly contradicts it**, stating clearly that this correlation was not statistically significant[7]. Furthermore, the report omits a study by the same research team finding the opposite result – that the largest clinical effects were found in the highest quality studies and this *was* statistically significant[5].

- The report states that substituting homeopathic treatment for evidence-based approaches is "the main risk associated with the use of these products", yet **no evidence is provided to substantiate this assertion**. Notably, **the large-scale French EPI3 study (8,500 participants) directly contradicts AEMPS's claim that homeopathy puts patients at risk**[8]: the study assessed homeopathy use under real-world primary care conditions and found that patients treated with homeopathy had similar outcomes to those receiving conventional medicine, using fewer conventional drugs, with no safety concerns – specifically stating that there was "no loss of therapeutic opportunity".

  The AEMPS's own safety assessment draws on just two sources — a 2012 case series review and a 2016 meta-analysis — omitting five of six available systematic reviews, all of which conclude that adverse effects of homeopathy are mild, moderate, and transient[9-13]. Thus, **the claim that homeopathy poses a patient safety risk is entirely unsubstantiated.**

The report fails to meet basic methodological standards

A review of this scope and consequence should adhere to the standard, established methodology for this study type (an umbrella review)[14]. However, the AEMPS report fails to do so on multiple counts: the study was not pre-registered with PROSPERO; used an unspecified, unvalidated quality assessment tool rather than the standard AMSTAR-2 tool[15]; excluded the Cochrane Library from its database search; and applied no GRADE certainty-of-evidence ratings, overlap analysis, or sensitivity analyses. **Taken together, these significant omissions** – none of which are acknowledged as limitations – **are sufficient to render the report's conclusions scientifically invalid**.

The existence of basic research on homeopathy is denied entirely

The report asserts that theories of mechanism of action for homeopathy have "no empirical or scientific support." **This is factually incorrect.** Systematic reviews have found that 72% of physicochemical studies have reported specific structural, thermal or spectroscopic features of homeopathic preparations that differ from control solvents[16]; and 77% of biological experiments report measurable, reproducible effects of homeopathic medicines across various models[12] including studies on cells[17, 18], animals[19] and plants[20]. Most recently, evidence of physiological effects has extended to agriculture/aquaculture, with highly-diluted homeopathic preparations being shown to improve survival, growth and reproduction in multiple species e.g. molluscs, fish and crustaceans under controlled farming conditions[21-23.]. Excluding the entire field of basic research, which provides data directly relevant to topics raised in the report, is not scientifically defensible.

Conclusion

HRI does not dispute that the clinical evidence for efficacy of homeopathy in specific pathologies requires strengthening before clinical guidelines can actively recommend homeopathic treatment for named conditions. However, **it is clear that the AEMPS report presents a fundamentally distorted and incomplete picture of the scientific evidence on homeopathy, reaching conclusions that cannot be considered accurate or objective, and are therefore invalid**.

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