

11-19-2015

Dear FTC Review Committee,

First, I'd like to thank you for reviewing the labeling and advertising guidelines for homeopathic remedies. I see an increase in confusion about the differences in botanical, nutraceutical and homeopathic products. This confusion seems to be coming from the advertising of non-homeopathic products as homeopathic. For example, a manufacture might advertise a product as "homeopathic" when the product is actually mostly something else, with a homeopathic remedy added-in. This type of advertising/labeling should not be allowed. These aren't homeopathic products.

The needs of my children lead me homeopathy. One of children suffered from chronic coughs and ear infections. From fall to spring every year, we were at the doctor's office every other month. This pattern was broken when I started using homeopathy. At the time, I knew very little about homeopathy, but now I am aware of research studies showing the efficacy of homeopathy for these conditions and many other conditions.

Before choosing homeopathy, I tried many rounds of antibiotics, nutritional support, chiropractic care, acupuncture care and general home support. While all of these strategies worked to some extent, none of them resolved the repeating pattern of ear infections and coughs.

I first learned of homeopathy through holistic health publications and general articles written for the public. I purchased my first homeopathic remedy in a health food store after noticing a homeopathic remedy advertised for 'loose rattling coughs.' This described my child's cough perfectly. I purchased the remedy, followed the directions and for the first time in a very long time, he did not require antibiotics. The remedy worked beautifully every time and within a half year I found that the child rarely had issues with the colds, coughs and ear infections and we were able to discontinue the remedy.

At this time in my life, I was also a La Leche League consultant (breastfeeding and nutrition for families) and a co-director for Parents of Child with Food Allergies. I worked with hundreds of families over the course 15 years. Many of these families choose homeopathy in addition to other traditional and complementary modalities. Over the years, I never saw a child with an allergic or toxic reaction to a homeopathic remedy. Many of the parents turned to homeopathy, because of their children's strong reactions from other interventions. Parents educated themselves through self-help books, articles in magazines and in consultation with trained practitioners. These parents often selected effective remedies after consulting homeopathy books written for the public. Some went on to take workshops and classes in homeopathy or consulted professional homeopaths. When homeopathy did not work, they

quickly moved on to other strategies. When I personally was faced with more complex issues, I consulted with professional homeopaths, a certified clinical nutritionist, a nurse practitioner and a couple of holistically trained doctors.

Today my young adult children continue to use OTC homeopathy. We have been extremely grateful for these OTC homeopathic products. It's also comforting to know that the remedies are easy to access while they travel and study abroad. Homeopathy has been a very important and effective part of our family's wellness program.

The homeopathic remedies are non-toxic, inexpensive, travel well and are easily accessible. They work for all ages. They help people manage a wide range of self-care issues, often preventing the need for more expensive and invasive treatment.

Several months ago, I listen to a radio program about OTC drugs on NPR's "The Diane Rehm Show." Much of the discussion was focused on non-steroid OTC drugs, such as acetaminophen and ibuprofen. The guests were educating the audience about the many side-effects of these drugs and their toxicity to the liver and kidney. Toxicity is not an issue with homeopathic remedies, as they are non-toxic. It's nice that we have safe and effective options.

You may also be aware of the continuing pollution of our water bodies by prescription, recreational and OTC drugs. This is of great concern as we are causing significant damage to the eco-systems and ultimately ourselves. Homeopathic remedies are non-polluting and their use does not accelerate microbial evolution and resistance.

To learn more about homeopathy you may want to review information found at [National Center for Homeopathy](#) and [Homeopathy Research Institute](#).

In closing, I believe the labeling and advertising laws are adequate, but non-homeopathic products should not be advertised as homeopathic. This is an enforcement issue.

Sincerely,

*Tanya Mahoney*