

Homeopathy for the FTC

General pharmacology and homeopathy are different. They follow different rules.

Regulation of homeopathy should therefore be carried out by homeopaths with an understanding of the subject, as well as an understanding of the underlying scientific, mathematical and legal issues.

It would be nonsensical to allow pseudo-skeptic opponents of homeopathy to regulate it in any way, since their understanding is limited. They would only conduct a witch-hunt in their eagerness to eradicate something they do not wish to understand.

Similarly, and given that Congress clearly decided that homeopathy should continue, regulation should not involve mischief and sophistry in an effort to discredit it because some zealots oppose it. So long as homeopathy is benefiting some part of the population, they should continue to have access to it.

FTC has already clearly identified a problem in that homeopathic remedies are required to carry a main indication, when the theory and successful practice of homeopathy is at odds with this idea. It was therefore a sly and subtle dig as the essence of the subject, which should not have gone forward since it lacks good basis. In addition, homeopathy is not recommended for chronic conditions, when from my own experience this is just where it excels. Such things as this are simply biased regulatory mischief.

Just because a particular homeopathic remedy is expected to work only on a small subset of a population with a particular diagnosis - other remedies would fit the others in the population - should not mean that it is denied to the few it does work for, even though it will not work properly on everyone. Medicine is not communism.

None of this changes the view that false claims should not be made, any more than the false claim that homeopathy "does not work" should be allowed to prevail in terms of marketing. It is just that claims should be properly and honestly phrased.

Efficacy

I am sorry to bring skeptics into this, since they are a vexatious irrelevance and their arguments do not hold water. Nevertheless, they should be noted if only to discard their views. I would also point out that just because skeptics are so wrong about homeopathy does not lend any better proof to its effectiveness than the number of successfully cured patients it produces, often patients who have variously been failed by what has recently become "conventional"

medicine.

FTC will be aware that there has been a concerted propaganda campaign waged by these so-called skeptics against the practice of homeopathy. (FTC may also have noted how these people lay claim to critical thinking yet somehow miss completely certain areas of conventional medicine which arguably are in greater need of reform. No matter. I might harbour a suspicion of racketeering but that is for others to look into.)

Suffice it to say that this campaign is profoundly unscientific: it seeks to deny the existing body of evidence confirming homeopathic effects, an emerging body of laboratory evidence showing unusual effects in high dilutions, and an increasing body of good quality research showing how good homeopathy can be (ref. the Homeopathy Research Institute, for example). Often such skepticism seeks to curtail proper research. Very often it is impolite and even threatening.

The degree of confirmation bias in these incorrect arguments can be seen clearly illustrated in the controversies surrounding recent 'high standard' reviews which seem, perhaps by pure coincidence, to have chosen levels of acceptability for 'good evidence' which just happen to optimise the antithesis. There is a general tendency to refuse to accept evidence if it does not fit with their *a priori* view that homeopathy is ineffective.

Also, the Dunning-Kruger effect is strong in these skeptics, who are well versed in false propaganda and their own fixed views of what 'science' is, yet have never done any genuine study of homeopathy. Most have a fairly shallow appreciation of chemistry, too, and fall into the error of seeing the physics of potentization as mere dilution.

In 2013, Prof RG Hahn (not a homeopath) re-analysed the existing body of evidence and found that

"To conclude that homeopathy lacks clinical effect, more than 90% of the available clinical trials had to be disregarded. Alternatively, flawed statistical methods had to be applied."

Homeopathy: meta-analyses of pooled clinical data.

Hahn RG 2013

<http://www.ncbi.nlm.nih.gov/pubmed/24200828>

"Studies depicting homeopathy as ineffective are bogus"
and, regarding Cucherat for example

".. only by discarding 98% of homeopathy trials and carrying out a statistical meta-analysis on the remaining 2% negative studies, can one 'prove' that homeopathy is ineffective"

His preliminary writings in 2011 are here

- 1 <http://roberthahn.nu/2011/08/04/meta-analyserna-av-homeopati-i/>
- 2 <http://roberthahn.nu/2011/08/04/meta-analyserna-av-homeopati-ii/>
- 3 <http://roberthahn.nu/2011/10/01/sanningen-om-homeopati/>

and some comment here

"Prof. Robert Hahn: My Scientific Article on Homeopathy"

<http://bit.ly/1YbYeKh> homeopathyheals.me.uk 2015

The latest Australian study shows similar evidence of bias.

It is pertinent then to observe that the "pseudo-skeptic" opinion and propaganda that homeopathy does not work is faulty, however unlikely that may seem.

The argument that homeopathy is no more than placebo is pure bunkum, since in cases where homeopathy is shown to work effects are permanent, whereas the "feel-good" factor of placebo is short-lived - not to mention in vitro studies etc.

I am confident that Science will survive this, though certain sources of "authority" may suffer in the light of further research. It may hinge on the difference between a proper scientific education and the short-cut of scientific "training".

In addition, I have found an interesting paradox concerning the current standard of RCT with frequentist analytical inference. This statistical approach does not properly detect effect in the unique or unusual case within a sample population, and it is a central tenet of homeopathy that treatment is individualised. Therefore, in testing homeopathy and finding it to fail, this is predicatable even when individual success is guaranteed. The method is faulty. Furthermore, when individualisation is properly employed, to test a particular individually successful homeopathic remedy against an increasing general population shows its conventional measure of "effect" as reducing.

Suppose one has general population with a particular diagnosis, where each and every patient is successfully treated with a different remedy according to the homeopathic approach.

Then one could take each remedy in turn and test it on a small general sample population with the same diagnosis, and it would be unimpressive.

Test each remedy in turn on a larger sample population, because the remedy may only be matched to one member of the group, the effect seems to diminish, mimicking regression to mean (even though it does work for the one).

Add in some confounding effect (such as the short-lived placebo effect), and any truth that such a remedy is effective for a particular individual is almost entirely hidden.

At very large numbers, one might expect to see each of maybe 12 to 200 remedies working on only a small proportion of the whole - insignificant in general pharmaceutical terms - but working well for those small well-chosen subsets for whom it is effective.

That is why one cannot reasonably ask for homeopathic remedies to pass tests in the same way as pharmaceuticals, which are aimed at profitability from a "one size fits all" approach.

Contrarily, pharmaceuticals might well not survive a "level playing field" comparison regarding adverse effects vs homeopathy.

Minutiae

Concern has been raised over the public understanding of homeopathy, and of science, and of the roles of the FTC & FDA.

It would be good for these to be addressed - but addressed properly and not merely from an antagonistic faux "science", pseudo-skeptic view.

I'm sure most homeopaths would be well happy to see homeopathic products clearly labelled as such.

We would be very unhappy for harmful products (and contexts of usage) to be mis-marketed as homeopathic.

We would also want a proper appreciation of how to use homeopathic preparations - we do not want patients taking them with meals, or with excessive regular repetition, or alongside substances which we know will antidote their effect.

Also, as regards homeopathics being on shelf space next to other products, proper guidance is that they should not be stored near to aromatic or other disruptive chemical influences (that includes coffee, and certainly camphoraceous oils!) which might render them truly ineffective, fulfilling skeptic imagination and fantasy.

I have often seen remedies stored next to essential oils because both are 'alternative'. This is thoroughly bad practice.

Data Collection

I would very much like to see a proper effort at good data collection to substantiate proper usage in practice.

Regrettably one would have to guard against manipulation by antithetic and dishonest skeptics who already try to mis-use the courts and agencies to pursue their agenda of denying homeopathy to those who may benefit from it.

