

## **Who should regulate homeopathy?**

Within the FDA, of course.

There are plenty of homeopaths, supporters of homeopathy who are knowledgeable about the subject, and who have backgrounds in the sciences or in medicine or in other well-regulated pursuits.

These are the people that the FDA (and FTC) should recruit to head the regulatory effort.

Whilst most of these experts would rather use their time curing people, I would hope that some would be prepared to fulfil the role.

## **Who should not be permitted to regulate homeopathy?**

(Within the FDA and the FTC.)

There are also a plenty of so-called skeptics (some already in the FDA, perhaps in senior positions), who detest homeopathy, and who dream of seeing it curtailed or banned.

The Dunning-Kruger effect is strong in these people; they believe very strongly, according to their own level expertise but from no basis whatsoever in homeopathy itself, that the whole concept is wrong from start to finish. I'm sure many are quite genuine in having this misconception, some out of they way they were trained, and some because they feel their authority is challenged by the possibility that some text-books may be wrong.

*Such people should not be let anywhere near regulation of homeopathy.*

I wonder how many are aware of the discussions of anomalies regarding Avogadro's hypothesis when it was first introduced, let alone deeper questions of liminality. And I wonder how many are aware of recent advances in the science of "high-dilutes" (such as the Montagnier paper last year, and Martin Chaplin's work), not to mention the progress of nano-particle medicine. Many just don't want to know, don't want the research done, and may even bully those who do. Hardly scientific.

## **Belgium**

Recently in Belgium, a committee on the regulation of homeopathy which had sat in comparative secrecy for ten years, decided that homeopathy should only be practised by registered conventional doctors. At the same time, the regulatory body for doctors decided that their doctors should not be allowed to practice or recommend homeopathy at all. Some 200 homeopaths were disallowed from practising, overnight; their patients who relied on them were left without effective support.

We should be reminded that patients of homeopaths are generally very satisfied with the treatment they receive, and many use homeopathic cures because so-called conventional methods have failed for them, whereas they find that homeopathy works.

None of those committees deciding the fate of of homeopaths' patients had any homeopathic representation on them. Presumably the homeopaths had been sleeping, or had not been told, or had no influence.

This is not a model that any civilised society should follow.

Similar clauses with potentially hidden intent have found their way into legislation in other countries.

The CPG Sec 400.400 document has some traces of these, which should be curtailed.

### **Should homeopathy be banned?**

No. So long as there are patients who claim to have benefit from it, it should be available for them.

Congress, after the years of discussion in the original legislation appear to have decided homeopathy should be kept despite the difficulties of measuring effect, and that remains recent legal opinion.

I should make the extra point that for a homeopathic remedy to work for some people, does not mean that it will work for all people. This is a principle of the individualised approach. It leads to wrongly failed assessment by standard RCT.

### **Should homeopathy be over-regulated?**

Obviously not. There is no reason to apply excessive regulation, especially given the relative safety of homeopathy, which is a factor in medical decision making. One should ask *cui bono*?

*Therefore the FDA should not give the FTC an excuse to stop sales (and indeed advertising) of homeopathic products and services.*

To over-regulate might force control of homeopathic remedies into other hands. This would hardly be to the benefit of the population. I don't see it as the remit of the FDA to do that.

To over-regulate could mean the end of homeopathy, something no doubt desired by its competitors and rivals, any who have a great sense of self-entitlement to all the profits to be had from illness.

Some might see such a move as connected with racketeering.

Once again, one should remember that many users of homeopathy find it successful after being failed by "conventional" medicine.

### **Colchicum officinalis**

An example of unhelpful regulation would be the case of colchicum, a cheap herb used for years by those suffering from FMF. The FDA handed control of it to a single company who performed trials to find out what was already known by FMF sufferers, as a result of which I understand the price went up 200-fold.

Colchicum happens to be in the HPUS, and I understand there is great concern on web forums lest FMF sufferers should be able to get it at the old prices via homeopaths.

Incidentally, homeopaths would probably treat FMF with other remedies, but I imagine 3x would be effective in the short term.

### **Does homeopathy work?**

We should ask that question.

Yes of course it does. For people who use homeopathy, it works. For those who do proper scientific testing and analysis, yes it does work.

For skeptics who have decided *a priori* that it does not work, no amount of evidence will persuade them. First they will say there is no evidence, then when shown evidence they will say it there is no *good* evidence, then when shown good evidence they will come up with some other excuse. This is not acceptable in science.

There are hundreds of thousands of clinical cases which show homeopathy to work, but the average skeptic will discount them, and not look for a reason why. That is to say, they may have a pet excuse, but they have no proper evidence.

### **Why do skeptics come to the wrong conclusion?**

Primarily from *apriorism*, but also because (rightly, it turns out), they do not trust themselves.

So they make a model of what they see as reality, a reductionist model which is comfortable but happens to be wrong. It is wrong because it does not properly observe the subject of study.

Then they test the model using multiple comparisons of an RCT, with a very narrowed and limited hypothesis.

Using conventional yet inappropriate mathematical methods, they then often (unsurprisingly) find it fails. Then they extend their incorrect conclusions back into their view of reality.

That their model of homeopathy often fails comes as no surprise to any

homeopath, who would look at the average clinical experiment and say they would not expect it to work, the trial design has simply not understood the subject.

I was talking earlier today about a typical such trial - Ernst's paper on arnica failing to treat carpal tunnel syndrome. No homeopath would use arnica to treat carpal tunnel syndrome in that way, why should anyone expect it to work?

Despite these poor designs, and despite the wrong maths methods, homeopathy is still shown to work in many cases.

<http://facultyofhomeopathy.org/research/>

which *should* link to <http://facultyofhomeopathy.org/research/randomised-controlled-trials/>

Skeptics also have a bundle of illogical alternative hypotheses, at which point their critical thinking deserts them.

### **Misleading evidence and propaganda**

The U.K. 2010 House of Commons Evidence Check is still quoted, despite having been noted and disregarded by the relevant Department of Health. The chairman was an anti-homeopath; he initially invited only others of like mind, and the report was ratified only by the chairman drafting in two new committee members who had not heard the evidence. Most of the other committee members abstained, one who actually heard the evidence voted against. The report has little merit.

I understand that the recent Australian report was also chaired by a known anti homeopath, and I noted extraordinary bias.

Wikipedia has a page on homeopathy which is misleading, and fiercely guarded by skeptics.

There is a very active pseudo-skeptic propaganda campaign. The FDA should not involve itself with these people. They are probably racketeering.

<http://www.bolenreport.com/skeptics/Skeptics2/hate%20group.htm> etc

### **Another view - Prof RG Hahn**

Prof RG Hahn of Sweden <http://www.roberthahn.se/RobertHahnEngl.htm> (not a homeopath) looked at the actual evidence base and saw antithetic bias in the major SRs published so far:

"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>

See also these, about his reappraisal of the subject, and the reactions he received:

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

<http://bit.ly/1YbYeKh> [homeopathyheals.me.uk](http://homeopathyheals.me.uk) 2015

"To bring the issue forward one should instead be focused on specific diseases."

"..evidence .. says that homeopathy has no effect, but only if you remove 95-98% of the studies that should be evaluated and use completely unsuitable models .."

in summary Cucherat "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"

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<http://bit.ly/1gEeTUI> [fighting-for-homeopathy.blogspot.co.uk](http://fighting-for-homeopathy.blogspot.co.uk) 2015

(Article in Swedish, Jun 2015

<http://www.homeopathy.at/betruegerische-studien-um-homoeopathie-als-wirkungslos-darzustellen/> )

"Homeopathy: Meta-Analyses of Pooled Clinical Data" Review article 17 Oct 2013

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<http://www.karger.com/Article/Pdf/355916>

The original blog articles 2011

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/>

## **Propaganda and racketeering**

### **Should homeopathic remedies be expected to show effectiveness?**

There is no reason why not, so long as

1. the regulatory burden is not too high, and
2. the principles of homeopathic medicine are observed.

The principles of homeopathic medicine are, remember, to produce rapid, gentle and complete cure by application of the minimum dose of appropriately *individualised* therapy. The principle of "like cures like" is a guide,

but the method is purely heuristic and empiriacal.

That is how repertories are developed, by seeing what works in clinical practice.

The repertories are therefore the repositories of evidence, albeit in real-world rather than RCT form.

As in the case of colchicum for FMF, further contrived testing is hypothetically interesting but not strictly necessary.

The skeptic press is highly excited at the thought that these 'archaic cures' may 'face modern scientific testing' - and, of course, be expected to fail because they know the RCT often fails to find effect (there is a reason for that, and it is not the same as there being no effect for the RCT to find).

Though they might deny it, many seek a back-door ban on homeopathy by over-regulation.

They hope to do this by holding homeopathic remedies to the same one-dimensional standard as their familiar allopathic medicines. ("Allopathic", method of opposites.)

**Why does the standard RCT not apply to homeopathy?**

.....Please see separate pdf.....