

Open Letter to Sir Hayden Philips, Independent Reviewer, ASA Ltd., 4th April 2018

- **“Big Pharma means big crime The mob bribes politicians and others, and so does the drug industry The tobacco and drug industries have much in common - the morally repugnant disregard for human life is the norm.”** Dr Peter Gøtzsche, author of over 50 papers published in ‘the big five’ medical journals, and co-founder of the Cochrane Collaboration.
- **“Only by omitting 98% of the evidence can you ‘prove’ homeopathy to be ineffective”.** **Homeopathy denigrators are therefore either “very bad scientists”, or else “liars”.** *Professor Robert Hahn*
- **‘Western Pharma wants a monopoly’.** The Indian Government, on setting up a new department **“to counter negative disinformation about homeopathy in the West.”.**
- **“ASA Ltd’s writing [on homeopathy] does not even begin to approach a professional standard”** *Professor P. Matthiessen and Dr G. Bornhöft*

Résumé

- Antimicrobial resistance (AMR) has been judged as posing the same level of threat to the public as terrorism. The German Pharmaceutical Industry and many others have verified the importance of homeopathy in combatting AMR. The Law does not permit incitement to terrorism; neither should the Law permit bogus propaganda attacks against homeopathy.
- The same persistent failures by both government and regulators that led to the financial crash of 2008 are replicated in present day failures of potentially fatal bias in favour of pharmaceuticals on the one hand, and against homeopathy on the other.
- Aside from 449 published positive homeopathy research papers, homeopathy outcome studies have shown benefits for 71% of patients, and in certain disease conditions better outcomes than those from pharmaceutical treatment. Homeopathy is demonstrated to be safe.
- Sir Hayden Philips (ASA Ltd’s Independent Reviewer) is urged to withdraw his biased and deeply flawed anti homeopathy report, to turn Queen’s evidence against those who misled him, and to discuss with the Attorney General which laws are appropriate to use in respect of those threatening public health through bogus attacks against homeopathy.
- Evidence suggests that Sir Hayden’s ‘Expert in homeopathy’, Professor David Hylands of Kings College London, has no knowledge, training, qualifications or experience in homeopathy, nor that he had studied much of the material on which he supplied analysis.
- Professor Edzard Ernst testified to the Science & Technology Committee in 2010 that he had once been a practising homeopath, apparently in his native Germany; if true, he could only have done so fraudulently. Ernst further testified that homeopathy was a placebo, a claim that even his own research had already shown to be untrue.
- Dr Ben Goldacre writes: ‘The global pharmaceutical industry is a \$600 billion business rife with corruption and greed’. Dr Marcia Angell has said: ‘It is simply no longer possible to believe much of the [pharmaceutical] clinical research that is published’.
- Only 11% of the 3,000 most commonly used treatments in the NHS in 2010 were proven to be beneficial. Over 50% of treatments had no evidence of benefit at all. Adverse drug reactions were the cause of 6.5% of all hospital admissions in 2008, costing the NHS £2 billion every year. A 2004 study suggested as many as 10,000 patients annually were dying in the UK because of adverse reactions from pharmaceutical drugs.
- The case against Homeopathy has rested heavily on endless propaganda, and on the discredited paper by Shang, which the BMJ admitted was below publication standard.

Dear Sir Hayden,

France has been consistently voted by the WHO as having one of the best healthcare systems in the world; abundant evidence suggests it to be no coincidence that the French are also amongst the highest users of homeopathy, both by the public and by GPsⁱ.

The global financial crisis of 2007-2008 was caused by persistent failures by both government and regulators, who allowed systemic failures in the banking system to flourish. Whistle blowers were ignored, mocked or silenced, until suddenly the whole world was faced with total financial melt-down. The effects of that crisis and the global recession that followed are still with us today.

For a decade or more, failures in certain countries by both Governments and regulators (including ASA Ltd) of both pharmaceuticals on the one hand and of homeopathy on the other, are prescient of a calamity perhaps even greater. Antimicrobial resistance (AMR) is recognized as a threat equal to terrorism, and both the death rate and cost to the economy from it are growing.

Different from ten years ago, and to the fury of authentic medical scientists around the world, global warnings of malfeasance against homeopathy have long sounded, even the German Pharmaceutical Industry Federation identifying the importance of homeopathy in combating AMRⁱⁱ. The Annual Report of the Chief Medical Officer (2013)ⁱⁱⁱ confirmed AMR to be the cause of over one fifth of all lost workdays in the UK, at a then annual overall cost in 2011 to the economy (health service included) of £30 billion. The situation is evidently worse now. Yet still whistle blowers in the UK are ignored or mocked.

This letter refers to ASA Ltd. Case No. A10-139800/JN; Homeopathy: Medicine for the 21st Century (H:MC21)^{iv}. You confirmed that the report to the ASA Council of this case was written under your personal supervision; on your advice the ASA Council decided, inter alia, that there is no history of success in homeopathic treatment of chronic disease, even though homeopathy was, and is, advocated or practised worldwide in treatment of chronic disease by professors of medicine, doctors and other highly qualified healthcare professionals in the millions, that number increasing all the time because they find homeopathy to be effective, cost-effective and, above all, safe. They surely cannot, every one of them, be so insane as to devote their lives to something that is of no benefit? How could it be that you and the ASA Council, with no scientific or medical qualifications, could know so much more about medicine than they?

Your report together with H:MC21's comments are available on H:MC21's website^v. This letter does not look to replay those arguments, nor is it written on behalf of, or prejudicial to, H:MC21. It is instead an examination (only partial) of whether you and other ASA Ltd personnel, wittingly or otherwise, were involved in illegal activity.

The authors of the Swiss HTA report told ASA's Chief Executive, Mr Guy Parker, (letters attached) that they considered your misrepresentations to be so massive (and obvious) as to constitute libel, yet Mr Parker evidently took no action, and instead asked a Mr Rob Griggs to tell the authors on his behalf that they had no right to complain! We understand you have personally seen these letters - why was it that you also took no action to rectify those misrepresentations?

Your report is still being used by persons of malign intent, even apparently to bully the Government. After studying the full contents of this letter and its attachments, we hope you will recognise the urgent need for reasons of morality, legality and of public safety to withdraw your report.

1) **Two Propaganda Myths** are widely publicised:

- i) Pharmaceutical medicine is scientific and is indubitably proven to work
- ii) Homeopathy is unscientific and a proven placebo.

Both propaganda myths are untrue. No system of medicine promises all cures for all diseases, and the Swiss Government was correct in its assessment, when elevating homeopathy to equal statutory status: 'the evidence base for homeopathy is incomplete, just as it is for pharmaceutical medicine'. People have a moral and legal right to unbiased, uncensored, accurate information on available treatments, and Myth Two should be seen in the light of Myth One.

The BMJ used to publish figures on the effectiveness of c. 3,000 most common NHS treatments; an already shockingly low figure of 15% classified proven to be 'beneficial' in 2007^{vi} fell steadily in following years to 11% in 2010, since when the BMJ no longer reports the figures. Over 50% of treatments had no evidence of benefit at all.

John P. A. Ioannidis is a Professor of Medicine and of Health Research and Policy at Stanford University School of Medicine and a Professor of Statistics at Stanford University School of Humanities and Sciences. The title of his 2005 paper "Why Most Published Research Findings Are False"^{vii} is self-explanatory - Ioannides finds as much as 90 percent of the published medical information relied on by doctors to be flawed or incorrect.

Dr Peter Gøtzsche (co-founder of the Cochrane Collaboration) writes in 'Deadly Medicines and Organized Crime'^{viii}: 'We cannot trust pharmaceutical industry trials at all and the reason is simple. We don't trust a person who has lied to us repeatedly, even though the person might tell the truth sometimes. The industry has broken our trust and it has enormous conflict of interest'.

Dr Ben Goldacre agrees: 'The global pharmaceutical industry is a \$600 billion business rife with corruption and greed'..... 'The result of all this is inevitable: patients are harmed, unnecessarily, in huge numbers'^{ix}.

And Dr Marcia Angell said: "It is simply no longer possible to believe much of the clinical research that is published, or to rely on the judgment of trusted physicians or authoritative medical guidelines. I take no pleasure in this conclusion, which I reached slowly and reluctantly over my two decades as an editor of The New England Journal of Medicine."^x

By contrast, a study of homeopathy carried out in Northern Ireland^{xi} for example showed that 71% of patients had benefited, the same figure as in the Bristol research quoted by H:MC21, which ASA Ltd were keen to prevent the public from knowing ("At Bristol Homeopathic Hospital 70.7% of 6,500 patients with chronic conditions benefited from homeopathic treatment and had reduced need for conventional medicine"). Dr Peter Fisher cites two further studies:

- i) 493 patients co-ordinated by the Charité University Medical Center, Berlin and supported by the German health insurance industry 'showed better outcomes at no increased cost when homeopathy was integrated in primary care'^{xii}.
- ii) A multinational comparative effectiveness study comprising of 30 doctors, at six clinical sites in four countries, including the UK, treating patients with acute respiratory problems. *Response at 14 days was 82.6% for homeopathy compared to 68% for conventional treatment. The rate of adverse events for conventional treatment was 22.3%, versus 7.8% for homeopathy.* A replication of this study included 1,577 patients, of whom 857 received homeopathic and 720 conventional treatment: improvement was significantly faster with homeopathy.^{xiii xiv}

Faced with all these indisputable facts, a campaign of homeopathy denigration and denialism appears to have been devised by persons with financial interests opposed to homeopathy, their motives effortlessly perceived by governments and populace all over the world such as Brazil, France, Switzerland and India, but unfortunately not by some, including ASA Ltd.

But so blatant is the truth, how could the denigrators ever have hoped to succeed, even with ASA Ltd on side? For the most part they have of course failed: homeopathy has spread around the world faster than ever before in the past ten years. Your ‘expert’ Professor Hylands claimed it to be ‘generally accepted in the scientific community that homeopathy is a placebo’. That is quite untrue, and serious questions must be asked of the integrity of those few countries where the denialists have any real foothold. Dr Peter Gøtzsche writes: **‘The mob bribes politicians and others, and so does the drug industry’**.

2) **Antimicrobial resistance (AMR) and The German Pharmaceutical Confederation**

Homeopathy growth is essential because AMR is also continually growing. The Chief Medical Officer for England, Dame Sally Davies, has placed the threat of AMR on a par with that of terrorism, likely to render much of pharmaceutical medicine useless, operations impossible, and people dying of (hitherto) minor infections. The founding fathers of antibiotics knew from the start that there would be only a limited timespan before resistance developed, and that moment has come: without alternatives, countless millions are predicted to die. Dame Sally was at one time calling for more powerful antibiotics to be developed, until it was pointed out that there was no reason to suppose that more powerful antibiotics would do other than damage the immune system all the more powerfully.

The Swiss HTA report contains analysis of high quality RCT trials in upper respiratory tract infections, a pathology of often significant antibiotic usage. As the Swiss HTA authors told Mr Parker, not only were those homeopathy trials white-washed out of existence in your report, but the homeopathic trials were of higher quality, and the results superior, to corresponding pharmaceutical trials. Even the **German Pharmaceutical Confederation** has verified the importance of homeopathy in combating AMR.

3) **Tactics, and true motives, of homeopathy denialists**

- i) A former Prime Minister once remarked: ‘I love it when people start abusing me, because I know then that they have not a single argument left’. It is indeed the name-calling that demonstrates the denialists’ absence of science. Homeopathy is ‘rubbish’ and homeopaths are ‘peddlers’ said Dame Sally Davies; ‘snake-oil salesmen’ said Ernst; more bizarre still was the BMA’s pronouncement that ‘homeopathy is witchcraft’, reduced later to ‘nonsense on stilts’ (with an apology issued to witches – yes, really!!). One writer in the BMJ has likened denialists’ behaviour to that of five-year olds in the school playground. But the abuse continues.
- ii) Persons with contrary vested interests were faced with all meta analyses for homeopathy being positive. Their solution, so it would appear, was a paper by Shang et al, whose analysis for reasons unstated systematically cherry-picked just 8 trials out of over 100 until arriving at the apparently desired result. Shang is suspected of being a deliberate homeopathy denigrator.

It is incredible that the whole of homeopathy should be dismissed by many on the basis of this one ‘research paper’, which the BMJ admitted was of such low quality that it should never have been published.

- iii) Replete with Shang’s meta-analysis, the denialists then attempted to use the UK House of Commons Science & Technology Committee (S&T), in which hearings Shang played a crucial role. The S&T’s conclusion, that homeopathy is a mere

placebo effect, was voted for by just three MPs, one an avid anti-homeopathy doctor, another with demonstrable connections with the pharmaceutical industry, two of whom attended none of the hearings (one not even a member of the S&T at the time of the hearings, but enlisted in time to vote).

- iv) Only RCTs and meta analyses were declared by the Committee to be valid evidence, not ‘real world experience’. As protested by 70 MPs, the Committee whitewashed all RCTs out of existence (just as your own report did), and declared positive meta analyses as invalid (for reasons nonsensical).

Ignoring real world experience would be like a football manager who studies premier league statistics all week but has no interest in watching the match on Saturday or in knowing the result. Or a Chancellor who can quote every line of Keynes but has no idea how the economy is actually performing.

How much dentistry or surgery would exist on an RCT only policy? Neither the patient nor the surgeon knowing whether the research ‘operation’ is real or a placebo – how nonsensical is that? And then there was Shang, which Ernst declared to be ‘devastating for homeopathy’: on the contrary, Shang’s blatant bias is devastating for the denialists, not for homeopathy.

- v) Endlessly washing out of existence all homeopathy RCT evidence, and all other evidence too, is the standard denialists’ procedure.
- vi) Following the discreditation and rejection by the UK Government of the S&T report, the denigrators next turned to the Australian National Health and Medical Research Council (NHMRC) (see Section 8), about whom serious complaints of malfeasance are currently in the hands of the Commonwealth Ombudsman.
- vii) Homeopathy denialists have a network of online bloggers, ready to denigrate any positive information about homeopathy.
- viii) Pharmaceutical vested interests are widely perceived to be the motivation of homeopathy denialists.
- ix) ASA Ltd’s role in homeopathy denialism is a primary subject of this letter.

4) ASA Ltd’s ‘expert’ in homeopathy, Professor Peter Hylands of King’s College, London

As noted by H:MC21, Professor Hylands has, according to his own CV, no knowledge, training, qualifications, experience nor research experience in homeopathy, but has on the contrary pursued a career in conventional pharmacology, with financial interests opposed to homeopathy. Professor Hylands as an expert in homeopathy seems highly questionable, if not implausible.

You claimed Hylands to have assessed as correct the conclusions of the S&T, but he did no such thing: he merely summarized it (not entirely correctly), and declared it correct, giving for example no explanation of how a ‘placebo’ can effect positive changes in animals and plants, nor of why Ernst was entitled to dismiss meta trials positive for homeopathy on the grounds of being ‘out of date’, nor of claiming that the infamous Shang et al paper was ‘devastating for homeopathy’. Further anomalies appeared, such as:

- i) Your report states: ‘We continue to expect claims to treat medical conditions, be substantiated with a robust body of evidence, consisting of RCTs conducted on human subjects,

where appropriate. We did not consider the **alternatives** [our emphasis] put forward such as patient self-analysis or outcome studies, alone to be suitably robust to support efficacy.’

But whereas the full Health Technology Assessment contained both robust RCTs and outcome studies, both you and Professor Hylands were seemingly unaware that the abbreviated English translation version (which was sent to you personally) largely omitted the latter, but contained the numerous pages of RCTs and meta analyses identified by the Swiss HTA authors.

As the Swiss HTA authors told Mr Parker: ‘ASA Ltd. needed to do no more than glance through their book’s contents pages to reveal the falseness of ASA’s absurd claims about it’. It seems somewhat implausible that either you or your ‘expert’ had ever opened the book.

ii) Hylands made the astonishing claim that ‘the [HTA’s] main conclusion was drawn from a meta analysis [by Shang et al] of qualifying trials which demonstrated efficacy for the interventions of conventional medicine and phytotherapy, but no significant difference from placebo for homeopathy’. But the Shang study contained no phytotherapy studies, revealing that Professor Hylands could not have studied the Shang paper.

iii) Your report to the ASA Council states: ‘We noted many of the studies which reported positive outcomes were based on patient self-assessments only, whereas a substantial review of over 100 placebo controlled trials [Shang] showed no convincing evidence that homeopathy was superior to placebo’.

Professor Robert Hahn, along with the Swiss HTA authors and numerous others besides, has studied Shang definitively, and gives a compelling alternative account (attached), which we would counsel you to study carefully. Their verdict is unanimous, that far from Shang demonstrating Homeopathy to be a placebo, the evidence Shang presents shows quite the opposite! Only by, for reasons unexplained, cherry picking his way from ‘over one hundred trials’ to just a very specific eight could Shang say that homeopathy was probably a placebo. The totality of evidence, or even most other choices of cherry-picking, would have produced a quite different conclusion, and Hahn is not alone in seriously questioning Shang’s motivation from the start.

5) Dame Sally Davies, Chief Medical Officer for England, and Professor Edzard Ernst

Dame Sally states repeatedly the dangers of AMR, yet sadly has still not yet withdrawn her comments that **homeopathic** remedies are “**rubbish**” and do not serve as anything more than placebos. We attach 449 published studies which contradict.

When challenged, Dame Sally could give no evidence to justify herself other than ‘it’s in the S&T’, which contains no such credible evidence, only misrepresentations and unsubstantiated personal opinion contradicted by the facts. As protested by 70 MPs, the S&T systematically omitted all positive evidence for homeopathy, also falsely stated positive evidence as negative, whilst Professor Edzard Ernst’s testimony of homeopathy being a placebo had already been disproved by none other than Ernst himself, his 1990 Randomised, Placebo-controlled, Double-blind Trial of homeopathic treatment of varicose veins^{xv} finding: ‘venous filling time improved in those given the homeopathic medicines by 44%, while it deteriorated in the placebo group by 18%!’

On three occasions Dame Sally has failed to explain how a placebo can effect beneficial changes in animals and plants; whilst saving thousands of lives in fatal epidemics, and potentially countless millions more lives from the danger of AMR is in our opinion definitely not ‘rubbish’. What is your opinion?

Ernst not only forgot that he had disproved his own ‘placebo’ testimony, he perhaps even more seriously testified to the S&T that he had once been a ‘practising homeopath’ in his native Germany; Ernst has no qualifications whatever in Homeopathy, so should this be true, he was acting fraudulently, it being illegal to practise homeopathy in Germany unqualified. Professor Hylands said that ‘Ernst is an expert on meta analyses’: others have a different opinion, e.g. Professor Hahn observes in his 2002 paper ‘A systematic review of systematic reviews of homeopathy’^{xvi}: ‘Ernst oscillates, for example, between rejection of articles which show specific effects on diseases, whilst in other instances he rejects articles if they do *not* show specific effects. **I've never seen a science writer so blatantly biased as Edzard Ernst**’.

6) Leptospirosis and Cuba

ASA Ltd was clear in its wish to hinder the public from knowing how homeopathy had near-eradicated the fatal infectious disease *Leptospirosis* in Cuba, even though the researchers and medical scientists involved in the project were highly respected in the conventional vaccine world, and working at the WHO designated Finlay Institute. The homeopathy was first administered only in the high-risk areas, where within two weeks a 90% decrease in incidence of the disease was observed, whereas the disease incidence continued to rise in the low risk areas which had not yet received the homeopathy. When the homeopathy treatment was extended to everyone on the island, the result was near-eradication of the disease, the death rate falling to zero, a result never before achieved by conventional vaccine.

Your report said the claims of the WHO designated scientists were invalid because: “we considered that in order to consider the role of the homeopathy in the treatment or prevention of a disease, clinical evidence would need to demonstrate how that remedy acted upon the disease within the body.” As noted by the S&T, there are some conventional medicines whose action on the body is also not established, including anaesthetics^{xvii}. Are anaesthetics therefore invalid ‘placebos’? Scientists do not understand the action of gravity on the human body nor on anything else: is gravity also a placebo perhaps? Or was the S&T not correct in confirming: ‘It is more important to know *whether* a treatment works – its efficacy – than *how* it works’^{xviii}.

Does common sense not direct us to observe the action of anaesthetics and of gravity, and to make sensible choices in the light of that? And can you see that it is the apparent disregard for human life that is profoundly shocking to people all over the world?

7) Homeopathy and ‘plausibility’

Of all the ‘arguments’ posited against homeopathy, the implausibility contention is surely the weakest of all, its validity rejected even by the S&T 2010 committee. Yet some (having lost every other argument) still claim that because the mechanism by which homeopathy works is not firmly established, that somehow ‘proves’ that homeopathy cannot work, and therefore it does not work. Many human hormones operate at a level of dilution the same, or greater, than many homeopathic medicines. Are hormones in your opinion also placebos?

8) According to denialists, ‘Homeopathy is unable to treat any disease’.

All pretence of homeopathy being a ‘placebo’ having been lost, and the S&T report having been so thoroughly traduced the world over, denigrators seemed forced to abandon quoting the S&T report and turn instead to the National Health and Medical Research Council (NHMRC) assessment of homeopathy, 2010- 2015, in Australia, who obliged with a new verdict that ‘there is no robust evidence that homeopathy can treat any disease’, after setting an unprecedented definition of ‘robust research’ that would simultaneously rule as invalid c. 98% of pharmaceutical research. The UK Homeopathy Research Institute^{xxix} has joined others in accusations of deliberate malfeasance by NHMRC, which as already noted are currently in the hands of the Commonwealth Ombudsman.

9) According to denialists, ‘Homeopathy is dangerous’

The Swiss HTA found Homeopathy to be effective, cost-effective and safe. No matter how many accusations against homeopathy as a valid, indeed vitally important, system of medicine are shot down, denialists are sufficiently motivated to invent new accusations. Dr Peter Fisher writes: ‘Homeopathy is very safe: for instance a survey of ADRs [Adverse Drug Reactions] reported to the Midi-Pyrénées (France) Pharmacovigilance service between 2008 and 2014 found 12,365 reports, of which only one was due to a homeopathic medicine.’

By contrast, it was reported back in 2008 that adverse drug reactions was the cause of 6.5% of all hospital admissions, and was costing the NHS £2 billion every year. But the full cost of the more recent Sodium Valproate disaster alone has been calculated by one MP to be £30 - 60 billion. A 2004 study by the University of Liverpool suggested as many as 10,000 patients annually were dying in the UK because of adverse reactions from pharmaceutical drugs.

Edzard Ernst et. al^{xx} claimed to have found 38 cases of harm caused by homeopathy, including 4 deaths, but provided no credible evidence that those deaths, nor any other ‘harm’, were due to homeopathy. Scientists strongly condemned Ernst’s paper as lacking in both rigour and logic^{xxi}, and containing ‘numerous striking errors’ using ‘seriously flawed’ methods and analyses^{xxii}.

Ernst alleged 30 cases to have been ‘direct adverse effects of homeopathic remedies’. How a placebo (Ernst’s opinion of homeopathy) could be supposed to cause direct harm is a further unsolved mystery. Is this not merely an attempt by Ernst to obscure the observation of Sir Ian Chalmers, Founder of the Cochrane Library: ‘people have suffered and died because the medical profession has allowed industry’s interests to trump patients’ interests’^{xxiii}?

As noted already, homeopathy is, in certain diseases, demonstrated to be superior treatment, safe at that, and in those diseases has therefore good claim to be the essential treatment^{xxiv}, the Swiss HTA noting in some cases the homeopathy research to be of the higher quality.

10) Legal Considerations

The Indian Government has set up a new department “**to counter negative disinformation about homeopathy in the West**”^{xxv} [primarily the UK, USA and Australia]. Negative disinformation is not legal in the UK, nor is it decent, honest or truthful. In some cases, lawyers may wish to consider the law on Abuse of Public Office. And the Fraud Act (2006) states –

Section 2; Fraud by false representation

(1) A person is in breach of this section if he—

- (a) **dishonestly makes a false representation, and**
- (b) **intends, by making the representation—**

- (i) to make a gain for himself or another, or
- (ii) **to cause loss to another or to expose another to a risk of loss.**

(2) A representation is false if—

- (a) it is untrue or misleading, and
- (b) **the person making it knows that it is, or might be, untrue or misleading**

Wilful Blindness also comes to mind. ASA claims to be independent of government, yet ASA Ltd’s solicitor, Mr Miles Lockwood, said in a meeting at the Palace of Westminster (when announcing H:MC21 to be one of ASA Ltd’s *test cases* on homeopathy) that ASA could not ignore Government advisors. Mr Lockwood was right: he and ASA Ltd. should have looked carefully at the evidence with an unbiased mind, and on seeing that these advisors’ opinions were unsupported by any credible evidence but contradicted by the facts, should have told them that it is the job of ASA Ltd. to support truth, not vested interests, and reported the matter to legal authorities.

11) Action

David Tredinnick MP has observed that the sternest critics of homeopathy are usually those who know nothing at all about it. ASA Ltd and its ‘experts’ seem a good case in point.

We are facing a global catastrophe from AMR. We call on you firstly as a moral imperative to withdraw your report, and to turn Queen’s evidence on those who sought to mislead you. We further hope you will join us in discussing with the Attorney General, in the light of dangers to the public commensurate with terrorism, the need for homeopathy denialists’ websites to be closed down, and whether the law needs to be strengthened to protect the public.

Yours sincerely,

Paul Burnett, Communication Team Lead, Homeopathy International.

Attachments:

HTA authors’ letters to Mr Guy Parker, Chief Executive, Advertising Standards Authority Ltd.
Professor Robert Hahn – Homeopathy, Ernst and Shang
449 published positive homeopathy papers.

CC's to: -

- The Prime Minister, the Rt Hon Theresa May MP
- HRH The Prince of Wales
- The Parliamentary and Health Service Ombudsman
- Lord Harris and Ms Wendy Martin (National Trading Standards)
- The Rt Hon Jeremy Hunt MP, Secretary of State for Health and Social Care
- The Rt Hon Greg Clark MP, Secretary of State for the Department for Business, Energy and Industrial Strategy
- Mr Jeremy Wright QC, MP, the Attorney General
- David Tredinnick MP
- Jeremy Corbyn MP
- John McDonnell MP
- Jonathan Ashworth MP, Shadow Secretary of State for Health
- Rebecca Long Bailey MP, Shadow Secretary of State for Business, Energy and Industrial Strategy
- The Baroness Chakrabarti CBE, Shadow Attorney General
- Mr Guy Parker, Chief Executive, ASA Ltd

References:

ⁱ As noted by US homeopathy practitioner and writer Dana Ullmann, a total of 120,110 French healthcare professionals (HCPs) prescribed at least one homeopathic drug or preparation in the studied 12 month period, representing nearly 95% of general practitioners, dermatologists and paediatricians. Available at: <https://www.ncbi.nlm.nih.gov/pubmed/25921648>

ⁱⁱ Available at: https://www.hri-research.org/wp-content/uploads/2017/09/2017-09-28_BPI-Position_on_EASAC_Publication.pdf , (Accessed 3rd April 2018)

ⁱⁱⁱ Annual Report of the Chief Medical Officer; Volume II, 2011 – Infections and the rise of antimicrobial resistance (DoH, March 2013); cited by the Alliance of Registered Homeopaths in its submission to the UK *Science and Technology Committee, House of Commons – Antimicrobial resistance (AMR), Nov. 2013*

^{iv} Available at: <https://www.asa.org.uk/rulings/homeopathy-medicine-for-the-21st-century-a10-139800.html> (Accessed 12th Feb 2018)

^v Available at: <http://www.hmc21.org/asa-full-case-2/4580281426> (Accessed 3rd April 2018)

^{vi} Plus 23% 'likely to be beneficial': (but there again, maybe not).

^{vii} "Why Most Published Research Findings Are False". *PLoS Medicine*. 2 (8): e124. doi:10.1371/journal.pmed.0020124. ISSN 1549-1277. PMC 1182327 . PMID 16060722.

^{viii} Gøtzsche, Peter C. (2013) *Deadly medicines and organised crime; How big pharma has corrupted healthcare*; Radcliffe Publishing, St Mark's House, Shepherdess Walk, London, N17LH, UK ISBN-13: 978-1846198847

^{ix} Goldacre, Ben. (2012) *Introduction to Bad Pharma, How Drug Companies mislead doctors and harm patients*; published by Fourth Estate, ISBN 978-0-00-735074-2

^x The New England Journal of Medicine, which Dr Angell edited for two decades, is considered the single most powerful and influential medical journal in the world.

^{xi} Available at: <http://www.healthcareni.com/wellness-clinic/treatment-options/homeopathy/> (Accessed 12th Feb 2018)

^{xii} Available at: www.ncbi.nlm.nih.gov/pubmed/16036164 (Accessed 3rd April 2018)

^{xiii} Riley D, Fischer M, Singh B, et al. (2001). Homeopathy and Conventional Medicine: An Outcomes Study Comparing Effectiveness in a Primary Care Setting. *Journal of Alternative and Complementary Medicine*, 7:149–159.

^{xiv} Haidvogel M, Riley D, Heger M et al. Homeopathic and conventional treatment for acute respiratory and ear complaints: A comparative study on outcome in the primary care setting. *BMC Complement Altern Med*. 2007; 7: 7.

^{xv} Ernst E, Saradeth T. "Complementary Treatment of Varicose Veins: A Randomised, Placebo-controlled, Double-blind Trial". K.L. Resch, 1990, 157-163.

^{xvi} Ernst E; A systematic review of systematic reviews of homeopathy 2002 (*Br J Clin Pharmacol* 2002; 54: 577-582)

^{xvii} Published Minutes of the Science and Technology Committee, Evidence Check 2: Homeopathy, page 7

^{xviii} Ibid, page 7

^{xix} Available at: <https://www.hri-research.org/resources/homeopathy-the-debate/the-australian-report-on-homeopathy/> (Accessed 3rd April 2018)

^{xx} Posadzki P¹, Alotaibi A, Ernst E. *Adverse effects of homeopathy: a systematic review of published case reports and case series.*; *Int J Clin Pract*. 2012 Dec; 66(12):1178-88. doi: 10.1111/ijcp.12026.

^{xxi} Walach H, Lewith G, Jonas W. *Can you kill your enemy by giving homeopathy? Lack of rigour and lack of logic in the systematic review by Edzard Ernst and colleagues on adverse effects of homeopathy.* *Int J Clin Pract*. 2012 Dec;66(12):1178-88. doi: 10.1111/ijcp.12026.

^{xxii} A Tournier, E R Roberts, and P Viksveen. *Adverse effects of homeopathy: a systematic review of published case reports and case series – comment by Tournier et al;* ; *Int J Clin Pract*. 2013 Apr; 67(4): 388–389. Published online 2013 Mar 24. doi: 10.1111/ijcp.12138 PMID: PMC3644880

^{xxiii} Goldacre B. (2012), *Bad Pharma: How Drug Companies Mislead Doctors and Harm Patients*: ISBN-10: 0865478007.2012.

^{xxiv} Does additional antimicrobial treatment have a better effect on URTI cough resolution than homeopathic symptomatic therapy alone? A real-life preliminary observational study in a pediatric population. Zanasi A¹, Cazzato S², Mazzolini M³, Ierna CM³, Mastroroberto M⁴, Nardi E⁴, Morselli-Labate AM⁴.

^{xxv} Available at: <https://thewire.in/166341/ayush-ministry-homeopathy-false-propaganda/> (Accessed 3rd April 2018)