

Dear Lord Harris and Ms Wendy Martin,

Thank you for your reply of 3rd August, and for sending us the letter from Mr Andrew Griffiths MP, which we read with interest. With no understanding of the issues (Mr Griffiths fails to comprehend the white-washing of any evidence that conflicts with elite vested interests), he proposes that the BEIS Dept. provide you with taxpayers' money for 'medical expert witnesses to determine the falseness of claims for any court action necessary'.

It took the police years to end the Krays' and Richardsons' protection rackets: aside from numerous senior police in their pockets, no witness would dare speak against the mobsters. But they fell in the end, and a number of corrupt lawkeepers fell with them. We suggest that few UK 'medical experts' in this country such as Mr Griffiths had in mind are currently likely to dare differ from the 'party line' of homeopathy bashing. As you know:

- Dr Ben Goldacre describes the **global pharmaceutical industry as a '\$600 billion business rife with corruption and greed'**ⁱ.
- The highly distinguished Dr Peter Gøtzscheⁱⁱ writes: '**Big Pharma means big crime The mob bribes politicians and others, and so does the drug industry**'.
- The equally distinguished Professor Robert Hahn (with no vested interest in homeopathy whatever) establishes that **anyone denying the effectiveness of homeopathy is either 'a very bad scientist' or is telling lies**.

The level of morality in this country is in respect of homeopathy quite shocking, and numerous medical professors and experts abroad are so disgusted with the behaviour of UK medical elite, also of Sir Hayden Phillips and ASA Ltd, they may be delighted for the opportunity to demolish in court whatever 'expert' the Government might like to supply.

Some Complementary Medicine (CAM) referrals by ASA Ltd to Trading Standards Camden may have been legitimate, which we would have supported. We are aware though of several others, backed by 'medical expert witnesses' that have lead to no prosecution, but instead to:

- Massive distress to bona fide CAM practitioners, before cases being dropped (with no apology)
- Substantial waste of taxpayers' money
- As we understand it, the sacking of at least one member of the Camden TS office.

Montgomery v Lanarkshire Health Board (2015) makes plain that all doctors have a legal obligation to inform the public of legitimate medical alternatives, a need heightened by ever growing dangers from pharmaceutical products. It is BOTH appropriate pharmaceutical medicine AND homeopathy that we need, as recognized by ever more countries abroad, but sadly not yet in the UK by ASA Ltd, nor by Mr Griffiths and the present Government.

The law does NOT permit omission of legitimate alternatives by use of flawed or fraudulent reports, and we are so pleased that you evidently comprehend the situation. Phillips was writing at a time when denialists were confident of destroying homeopathy worldwide, a dastardly plan which in the main is now categorically lost. It is a matter of national scandal that their voice is heard still here.

‘Medical Experts’

BEIS plans to make available to you taxpayers’ money to employ ‘medical experts’. The problem surely is who those ‘experts’ might be. Mr Griffiths was perhaps thinking of a member, or supporter, of the *Specialist Pharmacy Service report* which as you know ‘concluded’ homeopathy to be a placebo after omitting all evidence to the contrary, and using reports currently being investigated as being ‘pure scientific forgery’. The Dept. of Health did indeed accept this report as credible and true but, when we asked for its justification for so doing, was unable to provide us with any explanation.

There is such a need for this scandal to be exposed in court that, however unpleasant for the homeopath concerned, we almost hope that trials envisaged by Mr Griffiths will proceed as soon as possible. But with prison sentences recommended to be increased to at least 18 years for gross negligence leading to manslaughter (precisely what our previous letter to you demonstrates to be a quite possible outcome of homeopathy denialism), such a court case may be less pretty for your ‘expert witness’, less still for NTSB. As Shakespeare said, in the end truth will out – and it is already out.

Or could Mr Andrew Griffiths have been thinking of Phillip’s ‘expert in homeopathy’, **Professor Hylands of King’s College, London**, who as you know derided one of the most important books on homeopathy whilst appearing never to have opened it? As its authors told Mr Guy Parker, Phillips ‘needed only to glance through the contents pages to see the nonsense he had [on advice from his ‘expert’] written about it’.

Hylands claimed **Professor Edzard Ernst** (for so long a ‘go to’ voice on homeopathy as UK’s first Professor of Complementary Medicine, in spite of his own CV, like Hylands’, revealing him to have no training, qualifications or experience in any Complementary Medicine) to be ‘an expert in meta analyses’. Sadly, neither were sufficiently expert to remember, as you again already know, that Ernst has spent many years proclaiming homeopathy to be a mere placebo effect, Ernst himself having personally proved the opposite; nor to appreciate the foolishness of testifying that he had once practised homeopathy in Germany which, if true, would have been illegal (Ernst having no qualifications in homeopathy). Ernst would seem an unwise choice as NTSB’s ‘medical expert’.

Or might Mr Griffiths have been thinking of the Chief Medical Officer for England and Chief Medical Advisor to the UK government, **Dame Sally Davies**, who is on record as claiming homeopathy to be ‘rubbish’ and homeopaths as ‘peddlers’, ignoring the near eradication through homeopathy of the deadly infectious disease leptospirosis in Cuba:

- the death rate plummeting to zero
- homeopathy effectiveness far superior, and cost far cheaper, than ever previously obtained through pharmaceutical medicines or vaccines (widely seen as Dame Sally’s real problem with homeopathy).

We asked Sir Hayden Phillips nearly five months ago if he concurred that numerous lives saved in Cuba was ‘rubbish’: he is yet to respond, or to refute a single word of our *Open Letter* to him of 4th April 2018, which you hold. BEIS asking you to take referrals from ASA Ltd, you surely need as a matter of urgency to know whether Phillips and ASA Ltd agree with Dame Sally’s opinions. For NTSB to ally itself with such views, would that not leave you, along with others already, open to implication of racism of a most unpleasant kind? ASA Ltd’s Chief Executive, Mr Guy Parker, had full knowledge of serious misrepresentations in his *Independent Reviewer’s report*ⁱⁱⁱ, yet took no action. ASA Ltd, seemingly accountable to no one, must surely be considered unfit for the purpose of regulating homeopathy advertising.

In his letter to you (11th April 2018), Mr Griffiths acknowledges the challenges faced by trading standards in taking forward cases referred by ASA. The solution is surely for you to engage with appropriate professional expertise in the CAM sector, rather than solely with people with no training, qualifications or working knowledge of the CAM discipline in question. Would it be sensible to seek legal advice on company law from a lawyer experienced only in, e.g., probate? A fine, e.g., dermatologist might be qualified in medicine, but should s/he write an ‘expert’ report on, e.g., organ transplants? Or on homeopathy?

Suggestions exist that a true expert in homeopathy might be biased towards endorsing untrue claims for homeopathy, the logical deduction being that no expert must ever be allowed to have any knowledge of the subject in which they are testifying, which is self-evidently ludicrous. And were it be thought that Homeopathy International rejects any criticism of homeopathy advertising, justified or not, we assure you that would be untrue: false claims are of no benefit to anyone, ourselves not least.

In conclusion, you will know that the ‘opinions’ on homeopathy in UK medicine are so hugely at odds with numerous medical experts all over world, that it may be prudent for you to listen to the advice of any ‘UK establishment expert’ only with the greatest caution.

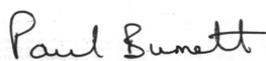
The way ahead

The *Road to Change* Proposal produced by the GRCCT in 2017, which was supported by some 150 Complementary Profession organisations and over 18,000 practitioners, proposed a range of options which would seem to us to meet your needs most satisfactorily, including the issues raised by Andrew Griffiths. These proposals were industry funded and would place no additional burden on the public purse, yet it is our understanding that ASA and NTSB have declined to discuss the document. We would be most interested to know in detail on what grounds the NTSB has to date refused to consider the *Road to Change* Proposal.

If the homeopathic profession (in this instance) has endorsed the process of providing appropriate expertise, then your present problems, both of *Prospect of Success* and, even more importantly, of *Compliance with Law*, are significantly reduced.

After identifying to us your difficulties to date with the *Road to Change* Proposal, a meeting at an early opportunity with NTSB, ASA and ourselves (or GRCCT) would seem a logical route.

Yours sincerely,



Paul Burnett, Lead Team Communication, Homeopathy International.

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The Minister of State for Business, Energy and Industrial Strategy, The Rt Hon Mr Greg Clark

The Minister of State for Health, The Rt Hon Matt Hancock

Lord O’Shaughnessy, Parliamentary Under Secretary for Health.

The Shadow Minister of State for Business, Energy and Industrial Strategy, Rebecca Long Bailey MP

The Shadow Minister of State for Health, Jonathan Ashworth MP

ⁱ *Introduction to Dr Goldacre’s 2012 book to Bad Pharma, How Drug Companies mislead doctors and harm patients.*

ⁱⁱ Author of over 50 papers published in ‘the big five’ medical journals, and co-founder of the Cochrane Collaboration.

ⁱⁱⁱ Letters from the authors of the Swiss Health Technology Assessment to Mr Guy Parker, attached