

Dear Mr Clark and Ms Jeffrey,

Thank you for your letter of 29th August 2018. We welcome your opening sentence ‘potential efficacy of homeopathy’, which pleasingly suggests your Government may now be preparing to concede that millions of professors, doctors and healthcare professionals are not all so insane as to devote their lives to something that doesn’t work, and that your Government has made a fatal error by accepting the *Specialist Pharmacy Report* which ‘concluded’ homeopathy to be a mere placebo, with profound consequences not only for health, but also the UK economy, business and industry.

Homeopathy is used by an estimated 10% of the UK population, suggesting that over six million people may sadly feel their intelligence to have been hitherto insulted by your Governmentⁱ. Your apparent signalled change of outlook is therefore good news indeed, and we welcome also your commitment to the right of homeopaths to practise, under the law of the land.

But in the face of one of the gravest threats to mankind in history, we are highly distressed that your reply fails still to address significant issues, not only for health but for business and industry also. Minister Penny Mordaunt has written that ‘the public has lost trust in their leaders’, saying:

- ‘Political leaders have.... failed to grip the key concerns, and valued political projects over the concerns of the people that elected them’.
- ‘Our medical leaders have chronically mistreated patients’.

There seems no better example of Minister Mordaunt’s thinking than Homeopathy, where your Government is perceived, one way or another, to have hitherto allowed precedence of short-term elite vested-interests over public wellbeingⁱⁱ, ignoring a surely blatant protection racket. Assurance of the right to practise is sadly hollow, given that you ignore ASA’s flagrant homeopathy denialism.

Why is Homeopathy so vital for Business and Industry, and the whole UK economy?

Chief Medical Officer for England, Dame Sally Davies, has told the Health and Social Care Select Committee that the NHS is hiding the true scale of death by antimicrobial resistance (AMR) through fear of ‘looking like it is failing’ⁱⁱⁱ. As deaths from AMR rise, life expectancy will logically fall, precisely as is happening (there may be other factors too, but AMR is undeniably a major factor). Homeopathy may not provide a perfect solution to every case, but it appears to provide a lot more promise at present than pharmaceuticals. Our attached letter to NTSB shows why previous predictions of 10 million deaths, as well as a cost to the world economy of \$60 to \$100 trillion each year by 2050, would appear, on present course, to be woefully short.

We accept it is not your responsibility to assess the medical efficacy of homeopathic treatments. But ‘Efficacy’ is not the same as ‘effectiveness’^{iv}; e.g. the pain killer Vioxx was declared ‘efficacious’, but withdrawn after causing c. 60,000 deaths^v. ‘Efficacy’ may be a specialized academic construct, but you are undoubtedly very well qualified to read and appreciate the findings of the attached Danno research, showing conditions where homeopathy is most consistently effective (crucially including reduction in antibiotic use), all with no loss of clinical results, at an annual saving of 20% (a potential annual saving of c. £25 billion to the NHS), massively significant to the UK economy.

BEIS’ strategy to promote competition (we prefer to say ‘choice’)

We put to you that your Department’s responsibilities to Business and the Economy are being fatally compromised by others’ failure of responsibility:

- HINT asked the DoH to supply us with their reasoning for accepting the *Specialist Pharmacy Report*, rejecting swathes of evidence to the contrary: DoH^{vi} could supply no such information.

- People want to know which medicines are actually likely to work for them. All homeopathy denialists refuse to look at homeopathy effectiveness, presumably because they know full well just how effective homeopathy actually is. Of course, pharmaceutical trials, often carried out by the manufacturers themselves, stand accused of being false or fraudulent up 90% to of the time, doubtless why homeopathy often wins hands down when it comes to effectiveness.
- Your letter states what ASA Ltd. should be doing, but makes no comment on what they are doing, and Phillips has still, after now six months, not refuted anything of our letter^{vii}. The Swiss HTA authors demonstrated to ASA Ltd Chief Executive Mr Guy Parker specific examples of Phillips' *Alice in Wonderland* approach, but Parker took no action. Is that acceptable to BEIS?
- Homeopathy shows up very well in efficacy trials too, all of which are white-washed out of existence by the denialists (ASA not least).

CAP advertising code. To whom are ASA and CAP answerable?

You say (para 5): 'The Advertiser's Code requires that marketers hold robust evidence to support claims made'. The ASA *Advertising Codes* are, as everyone knows, not the Law, but all are agreed that 'Objective claims must be backed by evidence, if relevant consisting of trials conducted on people' (the actual wording of CAP Code 12.2). But you have inserted a new word ('robust'), perhaps at ASA's instigation, which is not in the CAP code. What exactly does 'not robust' mean? To the Australian NHMRC, currently investigated for duplicitous misrepresentation, it appeared to mean in the context of homeopathy: 'anything that might diminish pharmaceutical profits'.

Our letter to NTSB details the near-eradication with homeopathy of deadly Leptospirosis in Cuba (which also exists in the UK), such results never before achieved through conventional medicine or vaccines, and of the Upper Respiratory Tract Infections homeopathy trials, results again superior to pharmaceutical medicine, but all evidence rejected by ASA Ltd. We put it to you that ASA has no interest in homeopathy evidence of any description, except to denigrate it.

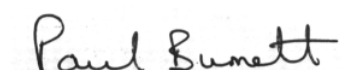
It is widely questioned whether ASA's clear campaign against homeopathy (and indeed all of CAM) was funded in large measure by the pharmaceutical industry, and having 'taken the shilling' are now unable to extricate themselves from the deal. This is of course an unproven, as yet unevicenced, suspicion, but many fail to see a more plausible theory. When an advertising regulator is permitted, so it would seem, to set countless lives at naught, the country becomes literally de-moralized. ASA Ltd is surely answerable to you to the extent that you are funding ASA's referrals to TS Camden. Please tell us anyone else to whom ASA and CAP are answerable.

The Solution

Homeopathy is spreading faster than ever because the human race requires it, and countries such as Switzerland have placed homeopathy on a constitutional equal footing with pharma medicine, not because Swiss doctors and politicians are all mad, but because they are responsible adults.

You need to engage with professionals in the field to point up denialists' fallacies. As in our letter to NTSB, the *Road to Change* proposal produced by the GRCCT in 2017 (a copy of which we understand you have) was supported by some 150 Complementary Profession organisations and over 18,000 practitioners, and we believe meets your needs, including issues raised by Andrew Griffiths, at no cost to the taxpayer. 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.

Attachments:

HINT letter to NTSB, 16th August 2018

Economic impact of homeopathic practice in general medicine in France; Karine Danno et al.

ⁱ With respect, the opening sentence of your letter will nevertheless sound to millions of UK homeopathy users as if the Dept of Transport were talking of 'potential of aeroplane flight', your Government having loyally followed advice from Lord Kelvin, august President of the Royal Society that 'Heavier than air flying machines are impossible', all air travel since being no doubt some 'placebo' flight of fancy. Our analogy is of course ridiculous: homeopathy was happily flying 100 years before the first aeroplane ever left the ground.

ⁱⁱ Government health advisors coming exclusively from the world of pharmaceutical medicine opens the door to unconscious or otherwise bias.

ⁱⁱⁱ <https://www.telegraph.co.uk/news/2018/09/04/nhs-hides-true-scale-superbug-deaths-fear-looking-like-failing/>; accessed 10 Sept 2018.

^{iv} Efficacy concerns academic interpretation of medical trial statistics; 'effectiveness' is what a medical procedure actually achieving in the real world.

^v https://www.forbes.com/2005/08/19/merck-vioxx-graham_cx_mh_0819graham.html#95c53e15698e

^{vi} The DoH referred us to NHS England on the grounds that it was they who commissioned the report. But NHS England were likewise unable to supply any justification.

^{vii} Letter to Sir Hayden Phillips dated 4th April 2018, which we sent you on 27th July 2018. To be fair on one point though, how could Phillips or the ASA Council possibly assess homeopathy cases, none having any scientific or medical qualifications, and therefore unable to see when the wool is being pulled over their eyes? The mistake is surely in anyone thinking that they could.