

# AUSTRALIA'S NATIONAL HEALTH & MEDICAL RESEARCH COUNCIL

## HOMEOPATHY REVIEW

### Summary for Integrative Veterinarians Australia (IVA), International Association for Veterinary Homeopathy (IAVH) and holistic veterinarians, February 2017

In August 2016 the Australian Homoeopathic Association (AHA) and its partners submitted a combined formal submission of complaint to Australia's Commonwealth Ombudsman, regarding procedural and methodological flaws, bias and conflicts of interest associated with the Australian National Health and Medical Research Council (NHMRC) review of the evidence on homeopathy, which was published on 11 March 2015.

The in-depth investigation into NHMRC's conduct in executing the Homeopathy Review has revealed that NHMRC withheld important administrative and scientific details regarding how it produced its finding of "no reliable evidence" across all medical conditions examined - despite publishing around 1,000 pages of report documentation. The investigation has uncovered details of how the NHMRC Review represented a process of applying extensive and arbitrary exclusion criteria to the data (pre- and post-hoc), rather than conducting a thorough review of primary research evidence as per internationally accepted standards.

This is an issue of international importance for the profession of homeopathy and the AHA needs financial support to continue its appeal. If you are able to make a contribution, please click on the link on the AHA website: <http://www.homeopathyoz.org>

#### Summary of key procedural flaws of the NHMRC Review of the evidence on homeopathy:

- In 2012, NHMRC conducted a first review of the evidence on homeopathy under a highly respected reviewer, which was prematurely terminated upon submission of their final Draft Report. NHMRC did not disclose its existence, its findings, or public expenditure on the process.
- The appointment of a member of an anti-homeopathy lobby group as the initial Chair of the NHMRC Homeopathy Working Committee (HWC), who was retained without the conflict being formally managed for the duration of the Review.
- The exclusion of homeopathy subject and homeopathy research experts to the HWC, in open breach of mandatory NHMRC standards and accepted standards of ethical scientific inquiry.
- Extensive post-hoc changes to the research protocol for the second (Optum) review, made months after the research protocol had been 'agreed and finalised', directly resulting in the formulation of the elements of NHMRC's unique 'reliable evidence' formula and their retrospective application to the data (e.g. the 'N=150 sample size' and 'quality rating scale' exclusion thresholds).
- None of the key changes to the research protocol that underpinned the findings were disclosed, despite the inclusion of a 'Changes to the research protocol' section in the report; exposing the Review to a high degree of bias and breaching basic standards of ethical scientific inquiry.
- NHMRC/HWC rejected appointment of independent expert reviewers with any homeopathy subject, clinical or research expertise.
- NHMRC's finding of 'no reliable evidence' did not pass independent peer review feedback (Australasian Cochrane Centre), which stated NHMRC's conclusion "*does not seem an accurate reflection of the body of evidence*", particularly "*when a substantial proportion of small (but good*

quality) studies show significant differences.” NHMRC did not account for or disclose this key feedback to the public.

- NHMRC also withheld disclosure of feedback from other expert reviewers, such as: *“The dismissal of positive SRs compounded with the lack of an independent systematic review of high quality RCTs leaves me uncertain of the definitive nature of the Report’s conclusions”*.
- Multiple undeclared anti-homeopathy conflicts of interest existed within NHMRC Council and the Principal Committee involved in overseeing the Homeopathy Review process.
- Undeclared conflicts of interest in a research group NHMRC hired in 2014 to assess additional evidence submitted by external parties; with none of the additional evidence (around a quarter of the total data) being included in the Overview.
- The NHMRC Chairman publically declaring, *“let me assure you, NHMRC does not support homeopathy”* at the start of the Review process, before any evidence assessment had begun.
- The NHMRC CEO similarly publishing his view that homeopathy is a *“retreat from reason”* and an *“alleged therapy”* when instigating the process and slandering the sector as *“charlatans”* and *“snake oil merchants”* at its conclusion - directly iterating language used by anti-homeopathy sceptics in lobbying the CEO against homeopathy during the course of the Review.

NHMRC describes itself as, *“an established leader in the development of high quality, evidence-based health advice”*. Bearing in mind such expertise and the fact that multiple research experts were involved in the process, the NHMRC and the Homeopathy Working Committee would have been fully aware of how unusual their methods and procedures were in conducting the Review.

The Australian and international community expects high standards of conduct by publically funded institutions such as NHMRC, whose reputations rest solely upon their ability to uphold the highest ethical standards in scientific inquiry.

### **If you want to support our efforts...**

The Australian Homœopathic Association (AHA) has set up a sponsorship programme for contributions to the legal and other campaign costs in the ongoing efforts of getting the NHMRC report rescinded. Any contribution to this fund will directly support these activities and will make a real difference.

The Homeopathy Research Institute (HRI), a major contributor to the complaints submission to the Ombudsman, is yet to receive a financial contribution for the time and effort dedicated to the combined effort, which ran into months. So far, other legal and campaign expenses have not permitted the AHA to remunerate the HRI. Further costs are expected for the public campaign to start when the documentary 'Just One Drop' has its premier in April 2017. One of the major topics of the film will portray the situation of homeopathy in Australia.

### **The Sponsorship Programme operates as follows:**

Supporters of the AHA and its campaign activities can make a financial contribution by becoming an AHA sponsor. As a result of making a contribution, sponsors will have their name listed on the AHA website, with their permission, as long as the campaign is ongoing. From the point of view of accounting and taxation, for businesses and organisations this is considered advertising and is tax deductible. If in agreement and with a

contribution of A\$500 or more, organisations and businesses can also receive an AHA Corporate membership as part of their sponsorship.

There are three levels of advertised sponsorship, indicated on the website by increasing font sizes and different colours:

Bronze – up to A\$1000

Silver – \$1000 - A\$5000

Gold – over A\$5000

Financial contributions from within Australia will incur GST. All contributions by organisations and businesses are tax deductible if designated as 'sponsorship'.

Electronic transfer would be the preferable method of contributing, either via PayPal through this link

<https://aha.wildapricot.org/page-504047>

or

via bank-to-bank transfer:

Westpac

BSB: 034-221

Acc. No.: 644032

Acc. Name: AHA Inc.

Reference: 'AHA Sponsorship'

SWIFT: WPACAU2S (for overseas transfers)

Your organisation will receive a tax invoice/receipt subsequent to your contribution, so that it can be included in your tax accounting for the purpose of tax deduction.

If you are not a member of the AHA, please send an email to [admin@homeopathyoz.org](mailto:admin@homeopathyoz.org) with your contact details so we can send you a tax invoice/receipt. Please also contact this email address if you do not wish for your business/organisation to be listed in the sponsor list on the AHA website.

All contributions received will be allocated to the campaign and not used for any other purposes.

***Thank you for consideration and support as we continue to grow homeopathy together.***

***Gerry Dendrinios***



***Vice President AHA & coordinator of investigation into NHMRC Hom Review***