

AMERICAN ASSOCIATION OF



HOMEOPATHIC PHARMACISTS

April 14, 2008

Ms. Ronni Sandroff
Editor
Consumer Reports on Health
101 Truman Avenue
Yonkers, NY 10703-1044

Dear Ms. Sandroff

The American Association of Homeopathic Pharmacists (AAHP) strongly disagrees with the opinion *Consumer Reports* voices in its April 2008 issue, stating that homeopathic medicines are unregulated, misrepresented in the marketplace, and harmful to consumers' health.

The AAHP is an 85 year old not-for-profit industry association recognized for its commitment to and full support of FDA's Good Manufacturing Practices and labeling compliance for all homeopathic drugs. The AAHP works closely with manufacturers of homeopathic medicines and with regulatory agencies to promote high standards in manufacturing and distribution of homeopathic drug products.

Homeopathic medicines are regulated as drugs by the U.S. Food and Drug Administration (FDA).¹ To be placed on the market, a homeopathic drug must be listed with the FDA and manufactured in compliance with the FDA's Current Good Manufacturing Practices for drugs. Additionally, the Homeopathic Pharmacopoeia Convention of the United States (HPCUS), an organization of scientists and clinicians trained in homeopathic medicines, publishes official standards for homeopathic active medicines, standards that are recognized in the Federal Food, Drug, and Cosmetic Act.

Like packaging for conventional over-the-counter (OTC) drugs, homeopathic drug products are required to be labeled with therapeutic indications, active ingredient(s), warnings and directions for use. Homeopathic products conspicuously state "homeopathic" on labels, enabling consumers to make their own choices.

The clinical evidence in favor of homeopathic medicines is mounting. Six meta-analyses of high quality clinical studies have shown the efficacy of homeopathic medicines and have concluded that this efficacy can not be dismissed as merely a placebo effect.^{2,3}

More than 200 years of successful medical use throughout the world has provided a strong basis of proof for the safety and usefulness of homeopathic medicines.

Sincerely,

Mark Land,
AAHP President

¹ U.S. Food and Drug Administration. Sec 400.400 Conditions Under Which Homeopathic Drugs May be Marketed (CPG7132.15). Available at: www.fda.gov/ora/compliance_ref/cpg/cpgdrg/cpg400-400.html.

² Linde K. et al. "Are the clinical effects of homeopathy placebo effects? A meta-analysis of placebo-controlled trials". *Lancet* 1997; **350**:834-43

³ Cucherat M. et al. "Evidence of clinical efficacy of homeopathy: a meta-analysis of clinical trials". *Eur J Clin Pharmacol* (2000) **56**: 27-33