

AMERICAN ASSOCIATION OF



HOMEOPATHIC PHARMACISTS

April 14, 2008

Ms. Jane Brody
Health Columnist
New York Times
620 Eighth Avenue
New York, NY 10018

Dear Ms. Brody,

In response to your April 8 column, "Potential for Harm in Dietary Supplements," AAHP would like to clarify the regulatory status of homeopathic medicines. Readers may mistake the legal and regulatory classifications for homeopathy and supplements as being the same.

Homeopathic medicines are regulated as drugs by the 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 publishes official standards that are recognized in the Federal Food, Drug, and Cosmetic Act.

Like conventional over-the-counter drugs, homeopathic drugs must be labeled with therapeutic indications, active ingredient(s), warnings and directions. Yet they clearly state "homeopathic."

Six meta-analyses of high-quality clinical studies found that the efficacy of homeopathic medicines cannot be dismissed as merely a placebo effect^{2,3}—supporting 200 years of successful use.

Sincerely,

Mark Land,
President
American Association of Homeopathic Pharmacists

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.