



**Response to the Pharmaceutical Society of Northern Ireland's consultation on 'Professional Guidance for Pharmacists in Northern Ireland on the provision of homeopathic products within a pharmacy'.**

**British Humanist Association, June 2010.**

**About the BHA**

The British Humanist Association (BHA) is the national charity representing the interests of the large and growing population of ethically concerned, non-religious people living in the UK. It exists to support and represent people who seek to live good and responsible lives without religious or superstitious beliefs. It is committed to human rights and democracy, and has a long history of active engagement in work for an open and inclusive society and for a rational approach to public ethical issues.

The BHA's policies are informed by its members, who include eminent authorities in many fields, and by other specialists and experts who share humanist values and concerns. These include world-leading scientists, and the Humanist Philosophers', a group composed of academic philosophers whose purpose is to inform BHA policy and to promote a critical, rational and humanist approach to public and ethical issues.

**Our position**

We are pleased to respond to this consultation on professional guidance on the provision of homeopathic products within a pharmacy, for pharmacists in Northern Ireland. Our position is firmly that public policy should be rational and evidence-based, and the government should ensure public funds are spent on treatments that have been proven to work, and on research that is backed up by scientific evidence.

We welcomed the House of Commons Science and Technology Select Committee's inquiry into the use of homeopathy in the health service, and the subsequent publication of its report with recommendations in February 2010. We are pleased that this consultation on new guidance for pharmacists has been published in light of those recommendations. As the Committee's report makes clear, the NHS is funding homeopathic treatments that have no evidential basis in their claims of effectiveness. It is the BHA's position that homeopathic treatments should not be funded by the NHS, that no further public money should be spent researching such treatments when the evidence that they do not work (except in some cases having a placebo effect) is overwhelming, and that pharmacists who do sell homeopathic products have a duty to make clear that there is no scientific or clinical evidence base to support the efficacy of those products.

**Response to consultation questions**

- 1) Do you consider it appropriate for the Pharmaceutical Society of Northern Ireland to publish new Guidance to pharmacists in relation to the provision of homeopathic products, as a result of the House of Commons Science and Technology Committee recent report on the matter?**

Yes. The Science and Technology Committee Report was the result of a full, transparent and rigorous inquiry into homeopathy, and it makes clear recommendations on a number of issues, including on the issue of homeopathy and pharmacy. Clear guidance for pharmacists on this issue is extremely important, in order that they have confidence when discussing homeopathic products with customers/patients and, in particular, when they may be speaking to people with strongly held beliefs in the effectiveness of homeopathy.

**2 & 3) Do you agree with the good practice guidance for pharmacists on the sale of homeopathic products within a pharmacy?**

Yes. The good practice guidance is clear and well-targeted. We strongly agree that as publicly recognised experts in medicine, pharmacists have a duty to advise patients that there is 'no scientific or clinical evidence base for the efficacy of homeopathic products, beyond a placebo effect.' We also think that it is an excellent idea that there are clear signs on shelves advising patients to seek further advice from the pharmacist. This alerts the patient that there are issues related to homeopathic products that they should be informed of, by an expert, before they purchase any products. Increasing patient awareness and choice in this way is to be welcomed.

Further, the vital role that pharmacists have in ensuring patients can make informed decisions leads us to support the protocols for pharmacists being embedded in the Pharmacy Procedures, including the appropriate questioning of patients' symptoms.

**4) Has the Draft Guidance fully and accurately described the risks in relation to pharmacies selling homeopathic products?**

There clearly are risks associated with homeopathy and it is interesting that those risks are not directly related to the homeopathic products (if they are tested to be safe) but as a consequence of using homeopathic products, as alternative "medicine", rather than supplementary to medically recommended and effective treatments. As those risks are, therefore, associated with behaviour, rather than directly with the products themselves, it may be less easy to identify and mitigate against them. One cannot, for example, ban homeopathic products nor can one ban people from buying and using them. However, the inclusion of risks clearly set out in the guidance is of the utmost importance, alerting pharmacists to the dangers, who can then explain them to patients and encourage responsible behaviour.

**5) Are there any equality impacts to the draft guidance on the provision of homeopathic products within a pharmacy that consideration should be given to?**

We have none.

**6) Do you have any other comments, or suggestions for addition/removal, in relation to this draft guidance to pharmacists in Northern Ireland on the sale of homeopathic products in a pharmacy**

No further comments.

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