

Position Paper on Homeopathy (The National Council Against Health Fraud)

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Abstract

Homeopathy was devised by the German physician Samuel Hahnemann (1755-1843) as a reaction to practices based upon the ancient humoral theory which he labeled "allopathy." The term has been misapplied to regular medicine ever since.

The cardinal principles of homeopathy include that (1) most diseases are caused by an infectious disorder called the psora (itch); (2) life is a spiritual force (vitalism) which directs the body's healing; (3) remedies can be discerned by noting the symptoms that substances produce in overdose (proving), and applying them to conditions with similar symptoms in highly diluted doses (Law of Similia); (4) remedies become more effective with greater dilution (Law of Infinitesimals), and become more dilute when containers are tapped on the heel of the hand or a leather pad (potentizing). Homeopathy's principles have been refuted by the basic sciences of chemistry, physics, pharmacology, and pathology. Homeopathy meets the dictionary definitions of a sect and a cult--the characteristics of which prevent advances that would change Hahnemann's original principles. Most homeopathic studies are of poor methodological quality, and are subject to bias. Homeopathic product labels do not provide sufficient information to judge their dosages. Although homeopathic remedies are generally thought to be nontoxic due to their high dilutions, some preparations have proved harmful. The ostensible value of homeopathic products can be more than a placebo effect because some products have contained effective amounts of standard medications or have been adulterated.

Only about half of the 300 homeopaths listed in the Directory of the National Center for Homeopathy are physicians. Others include naturopaths, chiropractors, acupuncturists, dentists, veterinarians, nurses or physician assistants. Homeopathy's appeal lies in its personal attention to patients. Homeopathy is a magnet for untrustworthy practitioners who pose a threat to public safety. A perverse belief in the "healing crisis" causes practitioners to ignore adverse reactions, or to value them as "toxins being expelled."

The marketing of homeopathic products and services fits the definition of

quackery established by a United States House of Representatives committee which investigated the problem (i.e., the promotion of "medical schemes or remedies known to be false, or which are unproven, for a profit"). The United States Food, Drug, and Cosmetic Act lists the Homeopathic Pharmacopeia of the United States as a recognized compendium, but this status was due to political influence, not scientific merit. The FDA has not required homeopathic products to meet the efficacy requirements applied to all other drugs, creating an unacceptable double standard for drug marketing. The Federal Trade Commission has not taken action against homeopathic product advertising although it clearly does not meet the standards of truthful advertising generally applied to drugs. Postal authorities have not prosecuted mail-order product promoters that make unproven claims for mail fraud. Three states have established homeopathic licensing boards. Some of these have been administered by medical mavericks with a history of difficulties with former medical licensing boards.

Recommendations

The NCAHF advises consumers not to buy homeopathic products or to patronize homeopathic practitioners. Basic scientists are urged to be proactive in opposing the marketing of homeopathic remedies because of conflicts with known physical laws. Those who study homeopathic remedies are warned to beware of deceptive practices in addition to applying sound research methodologies. State and federal regulatory agencies are urged to require homeopathic products to meet the same standards as regular drugs, and to take strong enforcement actions against violators, including the discipline of health professionals who practice homeopathy. States are urged to abolish homeopathic licensing boards.

Origin

Homeopathy (derived from the Greek words homoios "similar" and pathos "suffering") is a sectarian healing system devised by Samuel Hahnemann (1755-1843), a German physician who rejected the harsh medical practices of his era which included bleeding, purging, vomiting and the administration of highly toxic drugs.

Practices of the era were based on the ancient Greek humoral theory which attributed disease to an imbalance of four humors (blood, phlegm, and black and yellow bile) and four bodily conditions (hot, cold, wet, and dry) that corresponded to four elements (earth, air, fire, and water). Physicians

attempted to balance the humors by treating symptoms with "opposites." For instance, fever (hot) was believed to be due to excess blood because patients were flushed; therefore, balance was sought by blood-letting in order to "cool" the patient. Hahnemann dubbed such practices "allopathy" (allos "opposite," pathos "suffering"), and sought to replace it with his "Law of Similia" that treated "like with like."

Although medicine never accepted the label of allopathy, homeopaths continue to misrepresent physicians as allopaths to make their differences appear based upon conflicting ideologies rather than scientific pragmatism. Medical writers often refer to medical doctors as "allopaths" but their use of the term reflects an alternate definition of allopathy as "a system of medical practice making use of all measures *proved of value* (emphasis ours) in treatment of disease" (*Webster's New Collegiate Dictionary*). This definition is inconsistent with its root words "allos" and "pathos." Its duplicity aids those who wish to misrepresent medicine as ideologically allopathic (i.e., symptom suppression).

The Cardinal Principles of Homeopathy

The Psora and Vitalism

Hahnemann believed that 7/8ths of all diseases are due to an infectious disorder called the Psora (itch). In the words of Hahnemann's "Organon": This Psora is the sole true and fundamental cause that produces all the other countless forms of disease, which, under the names of nervous debility, hysteria, hypochondriasis, insanity, melancholy, idiocy, madness, epilepsy, and spasms of all kinds, softening of the bones, or rickets, scoliosis and chophouses, caries, cancer, fungus haematodes, gout-asthma and suppuration of the lungs, megrim, deafness, cataract and amaurosis, paralysis, loss of sense, pains of every kind, etc., appear in our pathology as so many peculiar, distinct, and independent diseases (Stalker, 1985).

Hahnemann believed that diseases represent a disturbance in the body's ability to heal itself and that only a small stimulus is needed to begin the healing process. He owed this to his faith in vitalism, which holds that life is a spiritual, nonmaterial process and that the body contains an innate wisdom that is its own healing force. A British homeopath explained its vitalism (Twentyman, 1982):

Hahnemann...is...a child of the modern age of natural science, an adept in the chemistry of his day... But he can still hold a conviction that an immaterial vital entity animates our organism until death when the purely chemical forces prevail and decompose it....This vital entity which he characterizes as

immaterial, spirit-like, and which maintains in health the harmonious wholeness of the organism, is in fact the wholeness of it, can be influenced by dynamic causes. How does Hahnemann attempt to clarify the idea? He draws attention to phenomena like magnetic influences, the moon and the tides, infective illnesses and perhaps most importantly the influence of emotions and impulses of will on the organism (pp. 221-225).

Vitalism appeals to so-called "Holistic" or "New Age" medicine devotees, who prefer a metaphysical view of life processes, and readily accept homeopathy despite its scientific deficiencies.

Provings and the Law of Similia

Hahnemann's invention of homeopathy is reported to have originated with an experience in which he ingested a substantial dose of cinchona bark (the source of quinine) used to treat malaria. He noted that the symptoms he experienced were similar to those of malaria. He reasoned that since the remedy produced symptoms in overdose similar to the condition it was used to treat, this principle, his Law of Similia, could be used to discern the value of various medicines. He called this process proving a medicine. Promoters often misrepresent homeopathy as treating the "causes" rather than merely the "symptoms" of disease, but its reliance on the "proving" of remedies shows that homeopathy itself relies solely upon a symptom treatment.

Hahnemann's Law of Similia utilized the primitive view of monism that "nature is a unitary, organic whole with no independent parts" (*Webster's*) with inherent principles that like is like, like makes like, and like cures like. Monism is the basis of many ancient practices (e.g., eating the heart of a lion for courage), and holds that if one object resembles another they are alike in essence (like is like); idolatry in which carving a likeness of a god actually produces the god (like makes like); and folk medicine practices such as snakeroot being good for snakebite, because of their resemblance (like cures like). Hahnemann revived Paracelsus' Doctrine of Signatures, which declared that herbs would cure conditions or anatomical parts they resembled (Garrison, 1929, p. 206). The homeopathic Law of Similia, however, is unsupported by the basic sciences of physiology, pharmacology and pathology.

Law of Infinitesimal "Potentizing"

Hahnemann's Law of Infinitesimals holds that the smaller the dose of a medication, the more powerful will be its healing effects. He taught that substances could be potentized (i.e., their "immaterial and spiritual powers" released to make active substances more active, and inactive substances

active). The process of potentizing involved the sequential dilution of remedial agents by succussion in which initial mixtures would be shaken at least 40 times, nine parts dumped, and nine parts of solvent added and shaken again. This process was repeated as many times as desired. Tapping on a leather pad or the heel of the hand was alleged to double the dilution—a notion that contradicts the laws of physics. Remedies are diluted to powers of ten and labeled with combinations of Arabic and Roman numerals (e.g., 3X= 1/1000, 4X= 1/10,000, 3C or 6X= 1/1,000,000, etc.). The fact that 19th-Century homeopathic remedies were dilute placebos made them preferable to the harsh concoctions being applied by the humoral practitioners.

According to the laws of chemistry, there is a limit to the dilution that can be made without losing the original substance altogether. This limit, called Avogadro's number (6.023×10^{23}) corresponds to homeopathic potencies of 12C or 24X (1 part in 1024). At this dilution there is less than a 50% chance that even one molecule of active material remains. Hahnemann himself realized that there was virtually no chance that any of the original substance remained at such high dilution, but explained it away in metaphysical terms. In addition to being contradicted by common sense, homeopathy's Law of Infinitesimals is invalidated by pharmaceutical dose-response studies.

Promoters claim that immunization and allergy desensitization verify homeopathy because they treat like with like, but neither meets the additional requirements of homeopathic theory and practice. Immunizations do not alleviate symptoms or cure. Neither immunization nor allergy desensitization grows stronger with dilution, nor can they be "potentized." Classical homeopaths proclaim that eating for relief of indigestion proved that like cures like, i.e., the Law of Similia. However, one does not obtain relief from indigestion by eating "potentized microdilutions" of the same food that was originally ingested. Other attempts to validate homeopathy such as the folksy value of "some of the hair of the dog that bit you" to relieve a hangover also fail to withstand close scrutiny.

Homeopathy and Science

Scientific medicine encompasses a collection of procedures, each of which must stand on its own as safe and effective for a specific purpose. History recounts examples of ancient healers doing the right thing for the wrong reason. Some bored holes in skulls (trephining) in order to liberate angry demons thought to be causing head pain, and in the process relieved intracranial pressure. This, however, does not validate the Demonic Theory.

Also, foul-smelling swamps were drained on the basis of the miasmatic theory, which taught that foul-smelling emanations from the Earth caused "bad air fever" (mal-air-ia). Further, Asclepian priests scraped spear shavings into the spear-wounds of warriors believing that the weapon that caused a wound would help in its healing (like-cures-like). Copper sulfate from the bronze spearheads may have inhibited infection. Just as doing these right practices for the wrong reasons did not validate the faulty theories upon which they were based, neither will the success of a "homeopathic" remedy comprehensively validate homeopathy's theory, pharmacology, and metaphysics.

Homeopathy clearly fits Webster's dictionary definitions of a cult: "A system for the cure of disease based on dogma set forth by its promulgator," and a sect: "a group adhering to a distinctive doctrine or a leader." Healing cults or sects cannot progress and retain their identity. Homeopathy is what Hahnemann said it was. To progress scientifically homeopathy would have to accept principles of pharmacology and pathology, which run counter to its "laws" of similia and infinitesimals, its potency theory, and notions of the psora and vitalism. By doing so, it would no longer be homeopathy but biomedicine.

Studies of Homeopathy

Controlled studies involving homeopathic remedies appear to divide along political lines. While the results of most studies do not support the use of homeopathic remedies, some ostensibly well-designed trials have yielded positive findings. Some of these, however, have been done by homeopaths, and their reports contain rhetoric that reflects bias strong enough to undermine confidence in the researchers' veracity. The best of these studies should be repeated by objective investigators with independent analyses of the homeopathic formulations employed to assure that they have not been adulterated with active medications.

A comprehensive review of experimental research in homeopathy was done by Scofield (1984). He concluded: "It is obvious from this review that, despite much experimental and clinical work, there is only little evidence to suggest that homeopathy is effective. This is because of bad design, execution, reporting, analysis and, particularly, failure to repeat promising experimental work and not necessarily because of the inefficacy of the system which has yet to be properly tested on a large enough scale. There is sufficient evidence to warrant the execution of well-designed, carefully controlled experiments." Scofield's most encouraging statement for homeopaths was that "homeopathy has most certainly not been disproved." However, Scofield ignored the scientific process. It is the absence of proof, not the absence of disproof, that

is important. This is consistent with scientific dicta (based upon the statistical null hypothesis) that (1) no practice can be deemed safe or effective until proved to be so; and (2) the burden of proof is upon proponents.

A more recent meta-analysis of 107 controlled homeopathy trials appearing in 96 published reports also found "the evidence of clinical trials is positive but not sufficient to draw definitive conclusions because most trials are of low methodological quality and because of the unknown role of publication bias." They also concluded that there is a legitimate case for further evaluation of homeopathy, "but only by means of well-performed trials" (Kleijnen, 1991).

In 1988, a French scientist working at that country's prestigious INSERM institute claimed to have found that high dilutions of substances in water left a "memory," providing a rationale for homeopathy's Law of Infinitesimals. His findings were published in a highly regarded science journal, but with the caveat that the findings were unbelievable, and that the work was financed by a large homeopathic drug manufacturer (Nature, 1988). Subsequent investigations, including those by James Randi, disclosed that the research had been inappropriately carried out. The scandal resulted in the suspension of the scientist. Careful analysis of the study revealed that had the results been authentic, homeopathy would be more likely to worsen a patient's condition than to heal, and that it would be impossible to predict the effect of the same dose from one time to another (Sampson, 1989).

The sectarian nature of homeopathy raises serious questions about the trustworthiness of homeopathic researchers. Scofield appropriately stated: "It is hardly surprising in view of the quality of much of the experimental work as well as its philosophical framework, that this system of medicine is not accepted by the medical and scientific community at large." Two guiding rules required by skeptics of pseudoscience should be applied to homeopathic research, to wit: (1) extraordinary claims demand extraordinary evidence; and (2) it is not necessary to prove fraud, rather, the research must be done in such a manner that fraud is not possible.

Homeopathic Products

Dubious Labeling

Recent years have seen an explosion of products labeled as "homeopathic." Among them are raw animal glands, herbal concoctions, and mineral remedies. Although some are reruns of old-time homeopathic preparations,

others appear to be merely pretenders with high-dilution their only homeopathic feature. For instance, homeopathic raw bovine testicles may be highly diluted, but in order to be truly homeopathic they should have been "proved" and potentized. To have been proved, healthy people should have been fed raw bovine testicles in moderate doses and the side-effects analyzed. Gland products are not representative of the kinds of therapeutic substances homeopaths have traditionally attempted to "prove," and it is unlikely that ingesting significant amounts of raw bovine testicles would produce any side effects. Such products appear to be intended to ward off regulatory enforcement action by merely labeling them "homeopathic," but such products do not meet the basic consumer protection principle of accurate labeling. Standard drug labeling informs consumers about the quantity of active ingredients per dose; homeopathic labeling only informs consumers about the number of serial dilutions of the remedy.

Questionable Safety

Although homeopathic remedies are generally thought to be nontoxic due to their high dilutions, some preparations have proved to be harmful. Perverse belief in the "healing crisis" can cause pseudomedical practitioners to misjudge adverse reactions as beneficial. Healing crisis is the theory that the body innately knows what is best for it. There is a corollary belief that adverse reactions to "natural remedies" are due to "toxins" being expelled, and that the worse these are, the worse would have been future diseases if not detoxified. Thus, believers are not alarmed by adverse reactions, and are encouraged to continue treating. At the same time, "allopathic" medicine is denigrated as the "suppressing of symptoms that represent the body's natural healing processes."

Kerr and Yarborough (1986) reported a case of pancreatitis that developed in a patient ingesting a homeopathic remedy prescribed by a chiropractor. According to the authors, the manufacturer stated that 40-45% of persons taking the remedy experienced a healing crisis that included abdominal pain. Although classical homeopathy employed numerous extremely toxic substances in infinitesimal amounts, Kerr found that two of six homeopathic remedies ordered by mail contained "notable quantities" of arsenic. NCAHF doubts that homeopathic devotees would systematically report adverse effects.

Suspicious Effectiveness

Much has been made of the fact that a 24X dilution would no longer contain a single molecule of the original substance, and reported benefits are generally

attributed to the placebo effect. However, many homeopathic dosages, although dilute, may contain enough of a substance to be effective.

Homeopathic products also may work because of adulteration. Morice (1986, pp. 862-863) reported that a homeopathic remedy called "Dumcap" appeared to be effective in treating asthma. Although labeled as containing "nux vomica" (strychnine), arsenic album (arsenic trioxide), *Blatta orientalis* (cockroach extract), and stramoni folic (stramonium), analysis revealed that the product was adulterated with therapeutic levels of the antiasthma, steroidal drugs prednisolone and betamethasone.

Studies of homeopathic remedies must be deemed unacceptable unless they have been monitored to assure that they were prepared according to homeopathic principles, their contents verified and dosage quantified, and secured to prevent tampering. As was stated above, simply labeling a product "homeopathic" does not guarantee that it does not contain a pharmacologically active dosage of an active substance (not all dilutions exceed Avogadro's number).

To validate a specific homeopathic remedy, replication by others who have no vested interest in the results is required. To validate homeopathic theory, higher dilutions would also have to be shown to work better than higher concentrations. Thomas Paine, a signer of the United States' Declaration of Independence, is credited with establishing a principle for judging supernatural phenomena. He asked, "Is it easier to believe that nature has gone out of her course or that a man would tell a lie?"

Homeopathic Services

Census

The 1993 directory of the National Center for Homeopathy (Alexandria, VA) lists about 300 licensed practitioners. About half of these are physicians. The rest are mostly naturopaths, chiropractors, acupuncturists, veterinarians, dentists, nurses, or physician's assistants. A homeopathic marketing firm spokesperson believes that several hundred more consider themselves to be homeopaths, and that many conventional physicians utilize one or more homeopathic remedies (National Board of Chiropractic Examiners, 1993). However, no data have been published supporting these estimates. In 1991-2, 36.9% of chiropractors reported using homeopathic remedies in their practices.

A Haven for Untrustworthy Practitioners

Part of homeopathy's appeal is the personal attention paid to patients (Avina and Schneiderman, 1978). In practice, classical homeopaths emphasize taking 30 to 45 minutes with each patient, paying careful attention to the emotional state and administering only one remedy at a time. Classical homeopathy's close personal attention to patients, benign remedies, and special appeal to a select clientele make it seem innocuous if practitioners have the competence and good sense to recognize serious disorders and readily refer to other physicians. This, however, is not always the case.

Pseudosciences such as homeopathy, even if relatively benign, are magnets for cranks and charlatans. This poses a serious problem because untrustworthy or incompetent practitioners should not be granted the privilege of administering health care. True-believing cranks may pose a more serious threat than con men because of their devotion to homeopathy's ideology. Their sincerity may make them more socially tolerable, but it can add to their potential danger. Irrational health care is never harmless, and it is irresponsible to create patient confidence in pseudomedicine. Although homeopathy may not pose a significant risk for a basically healthy patient, at some future time that same patient could face a situation where a life-or-death decision may swing on just such unwarranted confidence.

Some practitioners do not practice in homeopathy's classical manner, but use its "benign" reputation as a cover. A well-documented example occurred in Nevada. According to an expose by the Las Vegas Review-Journal, several maverick MDs who had been in serious legal difficulty in other states descended on Nevada and managed to get the State Legislature to set up a homeopathic licensing board with themselves in charge. However, none was actually practicing homeopathy. Rather, using an unapproved electronic device they practiced "energy medicine." When faced with the fact that they had deceived the State Legislature, proponents stated that they had used the more familiar term "homeopathy" because they feared that the legislators would not be able to grasp the new concept of "bioenergetics." The Nevada legislature rewrote the homeopathic practice act in 1987, specifically stating that Nevada homeopaths were limited to using substances prepared according to "the methods of Hahnemannian dilution and succussion, magnetically energized geometric pattern as defined in the official homeopathic pharmacopeia of the United States" (Hayslett, 1987).

It is difficult to believe that a physician could simultaneously sustain confidence in both homeopathy and scientific health care. It is common for homeopaths to misrepresent regular medicine as misguided to justify their unusual practices. Of special concern to NCAHF is the substitution of homeopathic preparations for standard immunizations. In 1989, an Idaho naturopath was prosecuted for selling homeopathic "immunization kits,"

which contained alcohol-and-water solutions and sugar pills. Defenders claimed that the homeopathic immunization products would "stimulate the immune system;" and that the FDA laboratory could not detect the active ingredients because they were so highly diluted with sugar.

Quackery

NCAHF is primarily concerned with homeopathy in the marketplace. It believes that marketing unproven homeopathic products and services precisely fits the definition of quackery: "A quack is anyone who promotes medical schemes or remedies known to be false, or which are unproven, for a profit" (Quackery, 1984). Dr. Kenneth Milstead, then Deputy Director of the FDA Bureau of Enforcement, stated (Young, 1968):

It matters not whether the article is harmless or whether it gives some psychosomatic relief; whether it is cheap or whether it has value for other purposes; whether it is produced by an obscure firm or whether it is produced by a "reputable" firm-the promotion of it is still quackery.

Regulators Fiddle While Consumers Are Burned

Federal Regulation

For many years homeopathic product marketing was quiescent, but with the health fad boom of the 1970's and 1980's, promoters began touting homeopathic remedies. In 1985 the FDA estimated that between 50 and 60 companies were marketing such products in the United States (FDA, 1985). The 1938 Food, Drug, and Cosmetic Act contains a section that recognizes as "drugs" items listed in the Homeopathic Pharmacopeia of the United States. This was mainly due to the efforts of New York Senator Royal Copeland who was the foremost homeopathic physician of his day. In 1938, safety was the main issue, and the highly diluted homeopathic products seemed to pose no inherent danger. However, in 1962, the Kefauver-Harris Amendment was passed requiring that drugs be proved effective before distribution. A legal fight loomed as to whether or not homeopathic drugs were grandfathered by the law, but FDA did not press the issue. Instead, it permitted products aimed at common ailments to be marketed over-the-counter (OTC), and restricted those aimed at serious ailments to prescription only. This "passed the buck" to the states that regulate the practitioners who write the prescriptions, putting consumers at the mercy of maverick homeopathic physicians. It also sent a signal to marketers that it was open season on

consumers with regard to OTC homeopathic products. The resulting marketplace growth increased the ability of trade groups to gain political support and made future regulatory action more difficult. Homeopathic claims of efficacy are unsubstantiated and violate the Federal Trade Commission (FTC) advertising standards, but the FTC has not acted against homeopathic advertising claims. Homeopathic remedies sold or transported by mail are subject to action by the U.S. Postal Inspectors, but few such actions have been taken.

State Regulation

Only Arizona, Connecticut, and Nevada have separate homeopathic licensing boards. At least two of these have included in prominent roles maverick medical doctors who have been in legal difficulties as regular physicians. Some state licensing boards permit licensed medical doctors to practice almost any kind of medicine they wish. Others, rightly in NCAHF's opinion, require that health care be held to rational and responsible standards. To its credit, the North Carolina Board of Medical Examiners revoked the license of the state's only practicing homeopath, concluding that he was "failing to conform to the standards of acceptable and prevailing medical practice." This resulted in a prolonged legal battle over the ability of a licensing board to impose standards of practice on its constituency. The state legislature eventually passed a law that limited the board's disciplinary power undermining the consumer protection aspects of responsible medicine.

Recommendations

To Consumers

Be aware that homeopathic products and services are marketed in a "buyer beware" situation at present. Homeopathic products are not required to meet the standards of effectiveness of drugs. Homeopathic services are poorly regulated. Physicians who practice homeopathy operate below the standards of responsible medicine. Some have backgrounds that raise serious questions about their honesty. Be aware that in some states that have homeopathic licensing boards the "foxes are guarding the chicken coops." Consumers should not entrust their health to physicians or nonphysicians who practice homeopathy.

To Basic Scientists

Homeopathy conflicts more with basic laws of physics, chemistry and pharmacology than with clinical medicine. Pharmacologists should be more proactive in opposing the marketing of homeopathic remedies. Because homeopathic theories contradict known physical laws, tests of homeopathic remedies require controls beyond those normally required of double-blind clinical trials including additional measures to show that fraud was not possible. To the U.S. Food & Drug Administration

(1) Require that labels of homeopathic products indicate the precise amounts of ingredients in milligrams, micrograms, etc. (2) Require homeopathic products to meet the efficacy standards of all other drugs.

To the U.S. Federal Trade Commission

(1) Review advertising of homeopathic products in publications aimed at the public for false and misleading claims. (2) Monitor and take action against advertisements in trade publications used to indoctrinate salespeople, who will in turn deceive consumers about the value of homeopathic products.

To U.S. Postal Inspectors

Prosecute distributors of homeopathic mail-order products that make unproven medical claims for mail fraud.

To State Legislators

Because homeopathy is scientifically indefensible: (1) Enact laws requiring that medical products sold within your state meet the standards of accurate labeling, truthful advertising, and premarketing proof of safety and effectiveness. (2) Abolish state licensing boards for homeopathy. (3) Do not allow homeopathy in the scope of practice of any health care provider.

To State Food & Drug Regulators

Take prompt regulatory action against manufacturers, wholesalers, and retailers of homeopathic products who violate the law.

To Medical Licensing Boards

(1) Discipline homeopathic practitioners for unprofessional conduct. (2) Prosecute nonphysicians engaging in homeopathy for practicing medicine

without a license.

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