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Dear Dr Mar ia Luisa Carcedo, Minister of Health

I am the current president of the European Committee for Homeopathy (ECH), which is a European umbrella organisation of 40 medical homeopathic associations, in 25 European countries, representing around 45 000 medical doctors with an additional qualification in homeopathy.

The ECH aims are:

- Promoting the scientific development of homeopathy
- Ensuring high standards in the education, training and practice of homeopathy by medical doctors
- Harmonising professional standards in homeopathic practice around Europe
- Providing high quality homeopathic care in a medical context
- Integrating high quality homeopathy into European healthcare

I would like to highlight some key points you may want to consider in relation to homeopathy.

Homeopathy is the second most practised complementary medicine. Worldwide, over 200 million people use homeopathy on a regular basis. Homeopathy is included in the national health systems of many countries e.g. Brazil, Chile, India, Mexico, Pakistan, Switzerland, France, Germany, United Kingdom. In Europe, homeopathy is practised in 40 out of 42 European countries. 100 million EU citizens, some 29% of the EU's population, use homeopathic medicines in their day-to-day healthcare<sup>1</sup>.

Recently the Swiss government confirmed that medical services using complementary and alternative medicines (CAM), including homeopathy, will continue to be covered by national health insurances. This decision has been taken following a two years trial period and acknowledges these CAM meet statutory regulations with regards to effectiveness, safety and quality<sup>2</sup>.

On ECH's initiative a **standardisation process** has been successfully achieved recently. Its outcome is the CEN standard 16872 on Services of Medical Doctors with additional qualifications in homeopathy (MDQH) that was published in October 2016 and since April 2017 has the status of national standard in most European countries including Spain. The standard details the basic requirements of the Homeopathic Education Programme (HEP) including admission requirements, delivery of the education programme, learning outcomes and examinations, as well as good practice requirements.

In 2003, a WHO resolution (WHA56.31) on traditional medicine urged Member

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<sup>1</sup> <https://www.hri-research.org/resources/homeopathy-the-debate/essentialevidence/use-of-homeopathy-across-the-world/>

<sup>2</sup> <http://homeopathyeurope.org/homeopathy-continue-included-swiss-national-health-insurance/>

States, where appropriate, to formulate and implement national policies and regulations on traditional, complementary and alternative medicine to support their proper use. In 2009, resolution WHA62.13 further urged Member States to consider, within their national context, the inclusion of traditional and complementary medicine in their national health systems and establishing systems for the qualification, accreditation or licensing of practitioners of traditional medicine. We believe that the standardisation process mentioned above meets this demand.

Regarding patients' safety the *WHO Strategy on Traditional & Complementary Medicine 2014-2023* proposes two key goals:

- To support the member states on harnessing the potential contribution of CAM, including homeopathy, to health, wellness and people centred healthcare
- To promote the safe and effective use of CAM through the regulation of practices and practitioners
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These goals will be reached by implementing three strategic objectives:

- Building the knowledge base and formulating national policies
- Strengthening safety, quality and effectiveness through regulation
- Promoting universal health coverage by integrating T&CM health services into national health systems

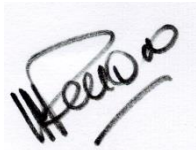
It would be counterproductive to step backwards and renounce to the protection of patients' safety and their right to free choice as provided by the European Charter of Patients' Rights.

Patients have the right to seek any kind of care for their health problems and they need to have access to medical doctors with additional competence in homeopathy properly trained.

For the same reasons, homeopathic medicinal products need to remain under the control of the registration process according to the European directive 2001/83/EC.

I hope this information will help you make the wisest decision to respect the Spanish patients' rights and safety. I remain at your disposal for providing any further information if needed.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Hélène Renoux', written over a light blue rectangular background.

Dr Hélène Renoux

President of the European Committee for Homeopathy