



9 October 2017

To all national homeopathy and anthroposophic medicine associations across Europe.

Re: *EASAC Statement*

Dear all

I am writing to you as a national homeopathy or anthroposophic medicine association that may have received information from EASAC, the European Academies Science Advisory Council and its recent statement, '[Homeopathic Products and Practices – Assessing the Evidence and Ensuring Consistency in Regulating Medical Claims in the EU](#)'. This statement was published at the end of September and has received considerable media coverage in different countries of Europe.

EASAC

EASAC is an association of national science academies of the EU Member States. It is neither an institution of the European Union (EU) nor a body tasked by the EU or by any EU Member State. According to EASAC's entry in the EU Transparency Register their legal status is "None."

In its Statement, EASAC appears to have simply accepted and repeated the questionable findings of studies and reports that support a critical view on homeopathy rather than investigating in a scientific way the emerging and most up-to-date scientific debate around this topic.

EASAC's statement also seeks to provide a scientific basis for policy making for homeopathic medicinal products in the EU. According to ECHAMP, which represents its member companies who are active in the manufacture of homeopathic and anthroposophic medicinal products, its assessment is based on incomplete knowledge of the current EU regulatory system for these products.

The statement by EASAC has the potential to have a detrimental impact on the position of homeopathy and ultimately on patients who use homeopathy. A clear strategy is required to deal with any repercussions of the EASAC Statement effectively.

Responses to the statement

Several organisations in the homeopathy sector have issued a press release and/or put a response on their websites, for example:

BHA: <https://www.britishhomeopathic.org/bha-blog/bha-response-easac-statement>

HRI: <https://www.hri-research.org/2017/09/easac-statement-on-homeopathy>

ECHAMP: <http://www.echamp.eu/echamp-resources/echamp-positions/2017-09-22-easac-echamp-response.pdf/view>

BPI: <http://www.bpi.de/arbeitsbereiche/homoeopathikaanthroposophika/aktuelle-themen/>

ECH: <https://homeopathyeurope.org/flawed-research-used-discredit-homeopathy/>

Dr Peter Fisher will also publish an editorial on the topic in the November issue of 'Homeopathy'

The public needs a response from the homeopathic community and our first impulse is to write a rebuttal but we are past the point of rebuttals alone having any impact. A more systematic approach is needed.

Background information

It was all started by Professor Dan Larhammar, professor of molecular cell biology, researcher in neurobiology and pharmacology, who is on the Board (and acted as President 1998-2004) of Föreningen Vetenskap och Folkbildning (VoF; www.vof.se), the Association of Science and Public Education, which aims to educate the people about the methods and results of science. For the Association, this includes creating doubts about alternative medicine. Utilizing his position as a professor at a university, he is the most active skeptic in Sweden and strongly attacked the anthroposophic Vidarkliniken, especially its Board member Dr Ursula Flatters.

In addition, he is on the board of consulting company Larhammar Consulting AB, which helps the pharmaceutical industry to accelerate the introduction of new drugs on the Swedish market.

This information can be found at the Swedish website of News voice:

<https://newsvoice.se/2015/01/08/dan-larhammar-arbetar-for-lakemedelsindustrin-och-kritiserar-samtidigt-alternativmedicin/>

He succeeded in prompting the Swedish Medicines Agency to ask the Royal Swedish Academy of Sciences for advice on the regulation of homeopathic and anthroposophic medicines. More details can be found in the document of the [Royal Swedish Academy Science on homeopathic and anthroposophic medicines](#) (in Swedish) and its [translation](#).

There was a call for nominations for EASAC's Working Group on Homeopathy. It can be found at the website of the [Royal Irish Academy](#).

A document by Dr Robin Fears, Biosciences Programme Director of EASAC from October 2015 "[Homeopathy: EASAC project proposal criteria](#)" is very clear about the strategy:

"We would need to be clear at the outset how to focus key messages (i.e. that homeopathic products are ineffective apart from the placebo effect and that there is no validated evidence base to support their use). It might be assumed that we would not have to repeat the extensive analysis already made by other scientific groups but we would need to reflect the wider EU experience. Thus, if EASAC were to do something on homeopathy, a relatively short Statement might be envisaged, requiring only limited additional scientific discussion – but there would need to be active review by member academies. This Statement might be generated quite quickly but the major challenge would be to ensure that it has impact at EU and national level. Significant follow up work by individual academies would be required, to pursue an objective of informed public engagement as well as informed policy-making."

The Working Group of experts acting in an individual capacity, nominated by member academies of EASAC included:

Volker ter Meulen (Chair, Germany)

Jean-Francois Bach (France)

Helmut Denk (Austria)

Georg Ertl (Germany)

George Griffin (UK)

Kristian Gundersen (Norway)

Pavel Jungwirth (Czech Republic)

Dan Larhammar (Sweden)

Vecsei Laszlo (Hungary)

Alberto Mantovani (Italy)

Jos van der Meer (the Netherlands)

Robin Fears (secretariat, UK)

Joint agreement

The following associations which represent homeopathy and anthroposophic medicine have agreed to a joint strategy:

ECH: representing medical doctors with an additional qualification in homeopathy

ECCH: representing homeopaths

ECHAMP: representing manufacturers of homeopathic and anthroposophic medicinal products

HRI: an international charity created to address the need for high quality scientific research in homeopathy.

IVAA: representing anthroposophic doctors

Strategy

1. Not to prepare a response to EASAC

Sending a rebuttal paper to EASAC will not be effective. It may be counterproductive as a first step.

2. Seek dialogue

We will take the opposite approach first: seek genuine, 'quiet' dialogue to clarify misconceptions and errors within the EASAC Statement, as well as understanding more about the counter-opinions of those outside the homeopathy sector.

This is not a naïve strategy. It is based on prior experience that tells us that whilst many 'skeptics' are entrenched in an immovable anti-homeopathy position, some academics are genuinely unaware of the bias in existing reviews of the evidence on homeopathy; they take them at 'face value', understandably assuming they are accurate, based on the authoritative authors/institutions behind them. These are the individuals we aim to reach via this non-combative first approach.

3. Contact national EASAC representatives

We propose that representatives from the homeopathy and anthroposophic medicine research community in each country work together in a co-ordinated joint approach to respond to this attack as follows:

- An agreed representative for each country would contact the national EASAC representative, especially the members of the EASAC Working Group (see above) and request a meeting.
- Where possible, enlisting the support of neutral academic colleagues from mainstream institutions to support the approach and the discussion would be preferable.
- When requesting a meeting, a diplomatic approach would be used, stating that unfortunately we have to conclude that the research literature EASAC has based their conclusions on is incomplete and we would like to meet the EASAC representative to discuss directly relevant literature, including recent high quality publications, that one would have expected to see cited in such a statement.
- In any conversation with the national EASAC representative, significant examples of homeopathy research could be mentioned, which could then either be shared with the interested party or brought to the meeting for further discussion.

Important points

- It is essential that the discussion is limited to research in homeopathy. It is neither

necessary nor helpful to address the need or otherwise for evidence for the regulation of medicinal products. It would not be helpful to stimulate public discussion on this political issue.

- Please make sure that the scientific discussion takes place in a conciliatory tone and outside the media, and also outside social media.
- Whilst this first strategy is implemented, it will not be helpful to escalate this debate in the public arena. For this reason, statements are currently being placed on websites but not circulated widely on social media.
- Raising public awareness of the EASAC Statement and its flaws is a step for consideration at a later stage, as and when necessary.
- Please share your experience and progress with your representative organization

The impact of the Statement will be continually tracked so that this strategy can be adapted if necessary.

EUROCAM is pleased to act as a co-ordinator to collate a summary of activity on this issue; please report back to us to let us know how you are responding in your country.

Kind regards

Dr Ton Nicolai
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On behalf of ECH, ECCH, ECHAMP, HRI and IVAA



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