

PATIENTS AND FRIENDS OF ANTHROPOSOPHIC MEDICINE

Response to informal consultation; medicines legislation review project.

The committee members of PAFAM write to express their views with regard to the regulation of Anthroposophic Medicines. While acknowledging the need for simplification and reform of the present system, there is concern with regard to the classification and licensing of anthroposophic medicines.

In 1968, when the Medicines Act was brought in, there were around 2000 anthroposophic medicines covered by PLR's. Currently, we understand that this number has now reduced to about 350. Should the PLR's be abolished there will only be a handful of licensed anthroposophic medicines. Without an appropriate re-structuring of the system, anthroposophic doctors would be prescribing, on the whole, unlicensed products. This seems a wholly undesirable scenario that doctors, fully trained and registered with the General Medical Council, have to prescribe the core of their medicines as unlicensed on a "Special" prescription.

It seems clear that during the reform process consideration should be given to the possibility of establishing a separate regulatory framework for Anthroposophic Medicine, in order to keep within a licensing system. This aspect of medicine has been in existence for around 90 years and as users of this form of medicine, we are keen to see it take its place alongside Herbal and Homeopathic Medicines. Its efficacy cannot be assessed under conventional criteria should the PLR's be abolished. Our understanding is that the EU does not require the removal of PLR's.

Should a separate system of licensing for these medicines not be acceptable then we would wish to see an extension of the Homeopathic National Rules to include injectables and low potency oral medications without indications. It is vitally important that Anthroposophic Medicines remain on the market for both over the counter and prescription only products.

A number of Anthroposophic Medicines are currently imported from Europe and because of import controls these can take up to three weeks to be available for use. It would be helpful to patients if a way could be found in regulations to speed up this service.

The use of Anthroposophic Medicine has slowly increased and has a valuable role to play in the future alongside conventional treatments. It is showing good results and indeed is saving money for the NHS.

Christine Twyford
for

The Committee of PAFAM