PAAM
PHYSICIANS ASSOCIATION FOR ANTHROPOSOPHIC MEDICINE

Urgent Call for Immediate Response-
Comment period ends January 28th!
Please share with colleagues, patients, family and friends:

As most of you know, the FDA is seriously considering limiting and restricting homeopathic (and anthroposophic medical) products and has published a 12/2017 Draft Guidance to that effect. Click here for a copy of this if you need to refresh your memory.

Americans for Homeopathy Choice (AHC) is a lay organization with strong ties to professional homeopaths and has filed (with legal counsel) a very reasoned Citizen Petition to the FDA to revert back to the previous Compliance Policy Guidance 400.400 (with minor revisions) that has worked very well so far. The FDA, by statutory law, must consider and respond to a citizen's petition. I am the liaison person for PAAM on two homeopathy committees developing strategies to address the FDA threat and the larger threat from various conventional "scientific" groups.

Right now we have ~8500 comments submitted to the FDA, the over whelming number are positive/supportive of the petition (only a handful of negative ones so far). We need more!! The goal is to get 10,000 positive comments submitted. It is very easy to submit a comment to the FDA. AHC has streamlined the process.

Please submit a comment and get as many of your patients/clients to do so as well. Non-U.S. citizens may also submit a comment. The official comment period ends 1/28/2019. The comment doesn't have to be very long or complicated. Even 1-3 sentences is enough!

Please use this infographic on homeopathy as helpful information for any patients or clients. Please print and give to any interested person.

Please also download, print and share this flyer, which offers two ways to submit a comment: the written URL address and the image to scan to get to the AHC website's easy instructions.

For your records and perusal, this fourth document is PAAM's official response to the FDA Draft Guidance that we submitted on 3/2/2018. After submission period closed for comments on the Draft Guidance, the FDA ignored the comments and indicated it was going to implement it as official policy. AHC got wind of this and then submitted the Citizen Petition to legally force the FDA to consider and respond. We are also working on the legislature side as a separate strategy.

On the AHC website you can find any additional information you may want about the petition and homeopathy. PAAM has already submitted a letter to the FDA is support of the Citizen Petition for homeopathic product regulation and a change in FDA policy.

Your active support is appreciated. You are not alone. The U.K homeopaths are now aware of this U.S. citizen petition and are quickly organizing a drive to submit comments to the FDA. There is also a similar push in the U.S. to get more people to submit a comment. Be a part of this wave!

Below is another way to get information and submit a comment!

Thank you and in appreciation,

Ricardo Bartelme, M.D.

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"American Homeopathy Needs your Help!"

Americans for Homeopathy Choice has submitted a Citizen Petition to the FDA and we need you to send in your comments in support of the petition. It takes less than two minutes to submit a comment in support to the FDA.

Homeopathy needs our voice. Visit SignTheHomeopathyPetition.com to copy and paste your comment and send it to the FDA.

Comments from around the world are welcomed.

What is the Petition all about?
Americans for Homeopathy Choice has petitioned the FDA to do three things:

1. **Form an FDA advisory committee on homeopathy.**
2. **Withdraw the Draft Guidance on Drug Products Labeled as Homeopathic dated December 2017 which threatens to severely restrict the availability of homeopathic remedies.**
3. **Convert Compliance Policy Guidance 400.400 (with minor changes) into a regulation. This is the policy that has guided the agency since 1988 and resulted in high standards of quality assurance in the manufacture of homeopathic remedies even as choice and availability continues to grow.**

Right now the FDA has no systematic way to get such input from the homeopathic community. The advisory committee would solve that. Withdrawing the Draft Guidance would lift the threat to homeopathy. Converting the current policy guidance into a regulation would solidify a system that has worked for 30 years and create predictability for manufacturers who could then confidently maintain and expand the variety of remedies they make.

Our petition is now available for public comment and we invite supporters of homeopathy to make comments. Anyone, anywhere can comment! To read the entire petition, Click here.

Learn more about the threat to American homeopathy here.