



16.02.2016

HMPWG – fourth list entries of stocks for which homeopathic use is justified

- release to HMA 11.12.2015
- deadline for comments 11.03.2016

Template for submission of comments on draft document

Written procedure decided by the HMPWG	30 May 2013
Adoption by written procedure	15 September 2013
Report of the outcome of the written procedure	21 November 2013

All instruction notes (in green) must be deleted before finalising the overview of comments.

Submission of comments on draft document

Table 1: Origin of comments

HMPWG – fourth list entries of stocks for which homeopathic use is justified

as released for public consultation on 11.12.2015, to be commented by 11.03.2015

<i>Organisation or individual</i>	Contact details (e-mail address, telephone number, name of contact person)
ECHAMP Rue Washington 38-40 B-1050 Brussels T +32 2 649 94 40	amandine.oset@echamp.eu

Interested parties are invited to send
comments together with a copy of the cited references.

This will facilitate the assessment of comments, suggestions and corresponding justifications.

When the reference consists of a book chapter, the copy must include
the page of the book showing the year of publication.

Comments without copies of the supporting literature will not be considered.

Comments should be sent electronically and in Word format (not pdf).

Comments and the identity of the sender will be made public
unless a justified objection is received at the time of the submission.

Please submit comments on each document separately.

Table 2: Comments

GENERAL COMMENTS ON DRAFT DOCUMENT

Interested party	Comment and Rationale	Outcome
ECHAMP	For transparency the literature references used as basis for each substance entry should be published since the compilation of bibliographic data on the homeopathic use of specific homeopathic stocks/ preparations is one objective of the HMPWG Homeopathic use subgroup.	
ECHAMP	To improve the benefit of all (now 4) lists of justified homeopathic stocks we suggest consolidating them into one single list in alphabetical order.	
ECHAMP	<p>The declaration Ph. Eur. <xxxx> (GHP/FP) is used comprehensively.</p> <p>We would appreciate differentiation whether Ph. Eur. is considering the raw material solely, amended by a GHP/FP monograph characterising the stock or if a Ph. Eur. monograph for the homeopathic preparation (starting material and homeopathic stock) exists. We suggest declaration as follows:</p> <ul style="list-style-type: none">➔ Ph. Eur. <xxxx> / GHP / FP ➔ if the raw material is considered by Ph. Eur. and the stock in the GHP/FP➔ Ph. Eur. <xxx> (GHP/FP) ➔ if a monograph for the respective homeopathic preparation exists in Ph. Eur. (raw material and homeopathic stock)	
ECHAMP	In the current list citations of the GHP are sometimes not literally. Therefore, we commented the concerned materials individually in the list (see document attached). For future lists we would appreciate literal citation of the referenced monographs, because otherwise our effort for checking the lists is unplanned huge.	
ECHAMP	There are duplications between the lists of justified stocks, e.g. Kalium chloratum is listed in the third and in the fourth list. This can be avoided when one single list of justified homeopathic stocks is created, see comment above.	

SPECIFIC COMMENTS ON TEXT

Section number and heading	Interested party	Comment and Rationale	Outcome
4 th draft list entries	ECHAMP	We are very pleased to find that “Arnica GHP” (relevant part: radix) is considered in the current list, after we contributed with literature for this material after the first list of stocks, where only “Arnica ex planta tota” was included.	
4 th draft list entries	ECHAMP	See amendments written directly into the list (highlighted), see document attached.	

Attached literature:

- Achillea millefolium ferm 33d GHP
- Actaea racemosa pour préparations homéopathiques FP
- Arnicae flos, Ph.Eur. 1391
- Avena sativa 2b GHP
- Avena sativa ferm 33c GHP
- Berberis vulgaris e fructibus GHP
- Bryonia cretica ferm 33b GHP
- Calendula flos Ph.Eur. 1297
- Chelidonium majus e floribus, ethanol. Digestio GHP
- Chelidonium majus Rh GHP
- Crataegus oxyacantha pour préparations homéopathiques FP
- Echinacea purpurea ex planta tota GHP
- Hamamelis virginiana e foliis GHP
- Hamamelis virginiana ex cortice summatibusque GHP
- Magnesium sulfuricum, HAB 1934
- Magnesium sulfuricum Commission D
- Roskastaniensamen DAB
- Sambuci flos Ph.Eur. 1217