HOMŒOPATHIC MEDICINE AND DRUGS ACT

The following is the text of a hand-out issued by the Homœopathic Pharmaceutical Chemists' Association, West Bengal on the above subject :

It is gratifying that the Government of India at long last is slowly recognising the Homœopathic system of medicine. Although its move is still hesitating in giving full recognition, most of the State Governments have enacted laws regulatnig practice of Homœopathy.

The Government of India has recently decided to amend the Drugs Act & Rules to bring within their purview the system of Homœopathic medicine also to control its manufacture and sale. While this move itself is commendable, it is found that now some clear idea and thinking on the part of the Government are necessary. As the Homœopathic system of medicine has its own peculiarities in respect of therapeutics so also it has peculiarities in pharmaceutics. Therefore, any attempt to control the manufacture of Homœopathic medicine on the conventional line will prove disastrous for it.

This Association is, therefore, of view that a completely separate enactment and rules should be made to control the manufacture and sale of Homœopathic Medicine.

In proposing the amendments to the present Drugs Act & Rules, as published in the Gazette of India of 29th February 1964, the Government has completely overlooked this point of view.

Now let us discuss the proposed amendments :

First, the Homœopathic system of medicine has got no single comprehensive Pharmacopoeia and as such recognition to only one Pharmacopoeia viz., U.S. Homœopathic Pharmacopoeia as proposed will lead to complete chaos in the field of manufacture. In Allopathy more than one Pharmacopoeia such as B.P., U.S.P., Pharmacopoeia of the U.S.S.R., Indian Pharmacopoeia have been given recognition. Therefore it will be proper to give recogni-

tion to other Homœopathic Pharmacopoeias as well e.g., British Homœopathic Pharmacopoeia, German Homœopathic Pharmacopoeia, Pharmacopoeia of M. Bhattacharyya & Co. at least until such time as a comprehensive Indian Homœopathic Pharmacopoeia is prepared by the Pharmacopoeia Committee appointed by the Government of India.

Secondly, in its attempt to put restriction on manufacture of Homœopathic Medicine, the Government is defining Homœopathic Medicine in such a way as to exclude many important medicines which have been proved to be of great efficacy in clinical experience although regular proving of them have not yet been possible. (It must be remembered in this connection that, in the materia medica of even well-proven classical drugs symptoms obtained from the source of clinical experience i.e., clinical symptoms hold a considerable share.—J. N. K.)

Thirdly regarding the manufacture of Homœopathic Medicine: It is common knowledge that the manufacture of Homœopathic Medicine particularly the potentisation is a very simple affair and does not call for any special skill or apparatus. As such, if any great hindrance by way of appointment of technical staff, compliance with various needs in respect of premises, apparatus (apart from general rules of cleanliness and health which are surely required to be observed) etc. are put and potentisation is termed as 'manufacture' which under the present definition of the word is most likely, the business of small dealers will be greatly affected and may ultimately result in the closure.

Then again, regarding the test of tinctures, the methods proposed are useless without any standard set out in Homœopathic Pharmacopoeia. As the basic view on the effectiveness of a Homœopathic medicine is completely different from that of a Allopathic medicine, the standards are very difficult to set and as such actually standards of tinctures like those specified in Allopathic Pharmacopoeia are not given in any existing Homœopathic Pharmacopoeia. Evidently therefore, the proposed methods of test etc. of tincture cannot be put into practice.

Fourthly, the method of labelling a Homœopathic medicine cannot be the same as that of Allopathic medicine. Here also comes the peculiarities of Homœopathy, small phials e.g., 1ml,

5ml etc., manufacture in very small quantity like 15ml or even less, a large number of medicines with their varied potencies which make it impossible to adopt the same method of labelling by putting batch no., date of manufacture etc. on the label.

Moreover, the labels of imported Homœopathic medicines neither do bear any such batch no., date of manufacture etc. Therefore, when retailing from such foreign packing, difficulties will arise in respect of batch no. etc. in labelling.

Again, the proposal of the Government not to allow manufacture of Homœopathic medicines in the *same premises* where Allopathic medicines are manufactured is rather too hard, particularly in the present stage of the industry and scarcity of space in industrial areas. The rule should be that no such manufacture would be allowed in the *same room.*

Lastly, the Association feels that the Government before enforcing a legislation on control of manufacture of Homœopathic Medicine should have staff with knowledge in Homœopathy as otherwise, various complications and misunderstanding will take place in enforcing the law to the detriment of the business.

It is hoped that the Government will give its careful consideration of the objections and suggestions given by the Association in these matters before finalising the amendments.