



Department of Health

Proposed regulation of Counsellors and Psychotherapists

Proposal by New Vistas Healthcare Ltd

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1. Introduction

New Vistas Healthcare Ltd welcomes the initiative by the Minister for Health and Department of Health to engage in a public consultation concerning proposals for the regulation of Counsellors and Psychotherapists.

New Vistas is an Irish company and a manufacturer of Homoeopathic Medicinal Products (HMPs) and Botanical Supplements. In addition, the company distributes other natural health products which complement its primary range of products. The company was first issued a Manufacturers License by the Department of Health in 1992. Licensing was subsequently delegated to the Medicines Regulator – HPRA, and the company's Licence and GMP Certificate (Good Manufacturing Practices) has been since then issued bi-annually. Copy of the current GMP Certificate is attached, see **Appendix 1**.

In the 25 years that have elapsed, New Vistas has developed to the point where it is the leading supplier of HMPs in the Irish market. In addition, the company has been a leader in the development of Complementary and Alternative Medicine (CAM), providing products, training, services and customer support to CAM Practitioners in Ireland. The company also exports products and services to other EU member states, particularly the UK and Italy. Homoeopathy is a safe and effective medicine with diverse applications in healthcare.^{1,2,3} A number of independent reports have been issued confirming safety of homoeopathic medicinal products.

- **Integrative Healthcare**

The proposals herein are concerned only with the education and training of Counsellors and Psychotherapists in so far as we believe that the inclusion of CAM Therapies in the training of such specialists will provide for greater choice in healthcare for citizens, better patient outcomes, improved quality of life, all at a lower cost for the taxpayer.

2. CAM Therapies

What are CAM Therapies? For the purposes of this proposal, we are concentrating on the better-known and more widely used therapies of: **acupuncture, herbal medicine, homoeopathy, chiropractic** and **osteopathy**. These therapies are generally referred to as the big 5, especially in the UK and Switzerland. In addition, there are many other therapies used in conjunction with, and/or in support of the above-mentioned such as **kinesiology, nutrition, exercise, reiki, massage, reflexology, meditation, yoga, mindfulness and prayer**.

Complementary and Alternative Therapies have been in a growth phase around the world for almost four decades. WHO (World Health Organisation) has advocated the use of Traditional Medicines in frontline health services in all countries. In its latest 10 year plan, WHO has re-designated its traditional TM to CTM, which gives added significance to the many branches of complementary therapies in addition to its traditional medicines.⁴

Market research indicates that a significant segment of populations use CAM Therapies and that they are agreeable to treatment by such methods.⁵ Homoeopathy, one therapy within CAM, has gained ever-increasing significance in recent decades as consumers and patients are becoming increasingly aware of and concerned about the risks and side-effects of conventional medicines. Over 100 million European citizens are aware of homoeopathy and

29% use it for healthcare.⁶ The pharmaceutical quality of homoeopathic medicines is governed by official homoeopathic pharmacopoeias of certain EU Member States, the European Pharmacopoeia and the HPUS. The legal framework governing homoeopathy has been set out in European Directives 2001/83/EC and 2004/27. This classifies homoeopathic products (traditionally referred to as remedies) as medicines. Consequently, they are subject to all relevant quality and safety requirements like the Good Manufacturing Practice (GMP) which apply to all pharmaceutical products.

Homoeopathic practice has evolved over the past 200 years in line with new innovations and knowledge generated in clinical practice. In addition, its scope has extended to include other complementary therapies as part of overall homoeopathic practice. For this expanded practice, the term **Homoeotherapy** is used as it more accurately reflects the overall needs and objectives of the patient or client (nutritional and spiritual) as well as the skills of the doctor and practitioner.

3. Growth in CAM Use

Over the 20 year period up to 2015, growth in the sale of homoeopathic medicinal products in the EU has grown on average by 6% per annum.⁷ Whilst all Member States have shown growth, the level of use varies considerably from one to another, a factor resulting from tradition and healthcare practices in various countries in Europe. Word-of-mouth suggestions from family and friends, followed by recommendations from a professional were found to be the best sources of information on the use and effectiveness of homoeopathy.

The following are some examples of the use and popularity of homoeopathy.

Germany: 94% of the population are aware of homoeopathy and 60% use it.⁷

Italy: 82% have heard of it, 35% have a positive attitude toward it and 16% of citizens use it at least once per year.⁷ Providers in Tuscany have integrated cancer care services incorporating conventional treatments with acupuncture and homoeopathy and other CAM therapies⁸

Spain: 33% of the population have used homoeopathy and 27% of those use it regularly. Of the users, 8 out of 10 people are very satisfied with the outcome.⁷

Austria: 50% of Austrians have used homoeopathic medicines. Of these, 62% are women and 37% men. Approximately 60% of Austrian families with school-age children use homoeopathy.⁷

Belgium: Some 69% of Belgian households use homoeopathic medicine, up from 50% in 2001.⁷

France: 77% of French people trust homoeopathy and 56% have used it with 36% using it on a regular basis. CAM therapies are regularly used as part of cancer treatments and palliative care, which sees homoeopathy as the leading therapy followed by acupuncture. Some 400,000 French cancer patients are currently using homoeopathy as part of their treatment.⁹

United Kingdom: Research carried out in 2015 states that 80% of people are aware of homoeopathy and 79% are open to it. However, only 15% have used it regularly. Lack of information and understanding were stated as the greatest barriers to use.¹⁰

Switzerland: A report on CAM stated that 50% of the population valued CAM and wanted it as part of their NHS. Of cancer patients, 40% found CAM effective and want it provided in hospitals. National Health Insurance reimbursement is now available for top CAM therapies including homoeopathy, herbal medicine and acupuncture.¹¹

United States: Several leading hospitals in the United States have departments for integrative medicine including integrative oncology. These include: Memorial Sloan Kettering, Mayo Clinic, John Hopkins Hospitals and Dana Farber Cancer Institute. The Cochrane Database makes many references to CAM therapies.

Women account for the greater share of demand, as high as 90% in countries like Spain, UK and Ireland. In the more traditional markets, it is more like 60% women and 40% men who utilise homoeopathy. Age groups vary, but it is typically the 30-50 year old age group, better educated and in higher income brackets. The fact that CAM Therapies are not State-supported or covered by Health Insurance eliminates many members of the public from the user groups.

Safety and the absence of adverse side effects accounts for an increasing number of people choosing homoeopathy. This feature is particularly strong among young mothers as they strive to provide protection for their children. Effectiveness is cited by many for their choice. Another reason is greater public awareness of the declining effectiveness of antibiotics and the search for alternatives. Experienced doctors are now recommending homoeopathy as a suitable alternative for antibiotics.¹²

4. Why CAM Training for Counsellors/Psychotherapists

A definition of the role and work of Counsellors and Psychotherapists is outlined on page 4 of "Response to Minister for Health on Regulation" which reads as follows:

"Counsellors and Psychotherapists are trained to work with people who have psychological, emotional and/or mental health issues which interfere with their health, well-being and quality of life. These issues may arise for a variety of reasons – coping with depression, anxiety, bereavement, trauma, relationship/sexual difficulties, child abuse, personal problems, solving issues, loss of meaning of one's life or/and addiction issues. Counsellors and Psychotherapists aim to help people to deal with the matters that are troubling them and to find strategies to manage, thrive and progress despite the issues."

CAM Therapies combine the best of Eastern health philosophy and Western scientific medicine as CAM has moved from tradition to science. Quantum physics, neurophysiology, traditional wisdom and spiritual practices from around the world are brought together and combined with the best of modern-day complementary medicines and therapies. The recipient has wider choice and an opportunity to participate in his/her healing. In addition, CAM therapy and an understanding of same,

enables the patient or client under guidance to gain a better comprehension of the obstacles outlined in the Department's brief and as such:

- Develop an understanding of personal negative belief systems and how they arise.
- Stop the repetitive, destructive thought and behaviour patterns which give rise to ongoing pain and despair.
- Clear unconscious obstacles that prevent healing and recovery.
- Understand how toxins (internal microbes and exogenous compounds) affect emotional health and ultimately, cognitive and mental function.
- Understand how gut environment and diet impact on brain health and cognitive function.
- Learn how stress, whether repetitive or chronic, can adversely impact on emotional health and lead to pathology.
- Incorporate subtle energy techniques to reprogram the mind, reduce stress and restore energy and vitality.
- Become mindful of body sensations and thought processes.
- Reduce dependence on prescription drugs and continuous use of medications.
- Embrace internal strength and power to embrace self-healing, harmony and enjoyment of life.

5. Selective training for Counsellors/ Psychotherapists.

We are not proposing in this document that Counsellors and Psychotherapists undertake study of all CAM therapies currently in use. However, we are suggesting that they become familiar with the key interactive therapies which will enhance their contribution to patient/client healing and wellbeing. These will include:

- Homoeopathy** – a gentle, safe and effective medicine, widely used and growing in popularity as mentioned in paragraph 2 herein. Homoeopathy has the widest field of application for a variety of complaints which give rise to emotional and mental health difficulties. These include conditions such as allergies, arthritis, ADHD, breast health, child birth and adverse post-natal conditions, chronic fatigue, hormonal issues, infertility, osteoarthritis, infections, injury, mental health and other conditions. See **Appendix 2**. Further information including results of clinical trials can be viewed on Homoeopathy Research Institute website - see www.hri-research.org
- Diet and Nutrition** – key requirements for gut health which science is increasingly showing to have a bearing on cognitive function, emotional wellbeing and brain health.
- Kinesiology** – a diagnostic tool in energy medicine which communicates with the subconscious mind, enabling the practitioner to assess underlying determinants of human behaviour in addition to nutritional deficiencies, imbalances and toxic overload.
- Herbal Medicine** – from traditional Western herbs, widely used in several countries for a range of conditions including emotional wellbeing and health maintenance. Certain herbs are recommended and clinically supported for more severe conditions like depression.
- Acupuncture** – a Chinese system of medicine in which fine needles are inserted at specific points along lines of energy (meridians) to restore energy flow. Acupuncture is acknowledged as very effective for pain management.

6. Conclusion

As a leading healthcare provider, we appeal for a wider integration of philosophies and practices within the current healthcare paradigm. We believe that the inclusion of CAM therapies in the training of Counsellors and Psychotherapists would be of considerable benefit to clients and patients, as it would further develop the individuality of each case, thus promoting more optimal, long-term results. The integration also strengthens the therapeutic approach and serves to ease the pain, frustration and disillusion of emotional and mental conditions. We will be available and happy to explain further any items enclosed herein and to discuss the proposals in detail, should that be required.

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