

16.02.2017

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

- Released for public consultation 25.11.2016
- deadline for comments 25.02.2017

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 – fifth list entries of stocks for which homeopathic use is justified

as released for public consultation on 25.11.2016, to be commented by 25.02.2017

Organisation or individual	Contact details (e-mail address, telephone number, name of contact person)
ECHAMP ECHAMP E.E.I.G. – European Coalition on Homeopathic and Anthroposophic Medicinal Products	Rue Washington 38-40 B-1050 Brussels Tel: +32 2 649 94 40 <u>amandine.oset@echamp.eu</u>

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	Commentating the list required much time because of formal mistakes like incomplete reference or names or wrong numbers of Ph. Eur. monographs. We would appreciate very much if future lists for commenting were made more carefully.	Leave blank (it will be completed by the Rapporteur).
	We would prefer to list the monographs of GHP and FP separately.	
	The used stock should be the same as described in the homoeopathic drug picture.	
Add rows as ap	propriate.	

SPECIFIC COMMENTS ON TEXT

Section number and heading	Interested	Comment and Rationale	Outcome
	party	to be added: written in red	
Agaricus muscarius, Agaricus /		To be added in column 1	Leave blank (it will be
Agaricus muscarius	ECHAMP	Amanita muscaria, Agaricus muscarius, Agaricus / Agaricus muscarius	completed by the Rapporteur.
		Comment/Rationale	
		In the GHP, "Amanita muscaria" is the main name, we ask to amend it.	
Agaricus phalloides, Agaricus		To be added	
bulbosus	ECHAMP	Agaricus phalloides, Amanita phalloides, Agaricus bulbosus	
		Ph. Eur. 2290 (GHP)	
		Comment/Rationale	
		In the GHP, the substance is also monographed, please add "GHP".	
		Agaricus phalloides is the only name used in the Ph. Eur., Amanita	

Section number and heading	Interested	Comment and Rationale	Outcome
	party	to be added: written in red	
		phalloides is the main name in GHP, Agaricus phalloides and Agaricus	
		bulbosus are synonyms in the GHP, we ask to include all three names.	
Apisinum		To be added in column 1	
	ECHAMP	Apisinum/ Apium virus	
		Comments/Rationale	
		We recommend that the first traditional French Latin name.	
Apocynum		To be added in column 3	
cannabinum/Apocynum	ECHAMP	Fresh underground parts of Apocynum cannabinum L. / Dried	
oannabinanii, pooynanii		underground parts of Apocynum cannabinum L.	
	ECHAMP	To be modified in column 3 / Dried, non blooming capitulum of Artemisia cina O. Berg	
	-		
Artemisia cina, Cina / Cina		Comment/Rationale	
Arteinisia cina, cina / cina		The French monograph is officially translated into English and published	
		on the ANSM website. Please note that the direct translation of the raw	
		material is: Dried, non blooming capitulum of Artemisia cina Berg.	
Aletris farinosa / Aletris		GHP has listed the fresh underground parts, which are also mentioned in	
farinosa	ECHAMP	the drug picture. The dried rhizome is only listed in the FP.	
Arisaema triphyllum, Arum		GHP has listed the fresh underground parts, which are also mentioned in	
triphyllum / Arum triphyllum	ECHAMP	the drug picture. The dried underground parts are only listed in the FP.	
Baptisia tinctoria		To be added in column 1	
	ECHAMP	Baptisia tinctoria / Baptisia	
		Comment/Rationale	
		The raw material Baptisia tinctoria (acc. to FP) is also the raw material for	

Section number and heading	Interested party	Comment and Rationale			Outcome	
		to be added: written in red				
		the homeopathic substanc	e Baptisia in t	he German homeopathic tradition.		
		The preparation of the mot	her tincture is	not specified in the current GHP		
		Magnesia sulfurica Magnesium sulfuncum	Ph. Eur. 0044 (FP)	Magnesium sulfate heptahydrate MgSO ₂ 7H ₂ O	Magner	estar (d30): Yes ray material surv radatate heptalychae(acc. ta
		Mercurius proto-iodatus, Mercurius iodatus, Mercurius iodatus flavus	Eb	Mercury ()) lodkle Hg ₂ l ₁	Ph. Ear We has auffaric creativ	(044) is a bottle row material for respects is substance Wagnesium and, the ugit the homeographic disets not specified in the Ord?. We
		Phytolacca americana, Phytolacca	GHP	Fresh roots of Phytolacca americana L., collected during autum	GHY 19 Monog	need "Magnesium tabloam" is n, becaus this term is used in the 34 and in the Kommission On you was Act both Innotative centrached
Calcium sulfuricum		Ph. Eur. Nº 0892 (GHP/			Tartal Second	
	ECHAMP	Calcium sulfate dihydrate	$CaSO_4 \cdot 2 H_2$	2		
Carbolicum acidum	ECHAMP	To be added in column 1 Carbolicum acidum / Phen Comments/Rationale We recommend to include Pharmacopoeia (FP) mono	the first tradit	ional Latin name as in the French		
Caulophyllum thalictroides, Caulophyllum / Caulophyllum thalictroides	ECHAMP	GHP has listed the fresh ur	nderground p	arts, which are also mentioned in I parts are only listed in the FP.		
Chondrodendrum, Pareira		To be changed in column 2	1			
brava / Pareira brava	ECHAMP	Please change name of the		drodendr umon		
		Comment: Typing error				
Collinsonia canadensis /		GHP has listed the fresh u	nderground p	arts, which are also mentioned in		
Collinsonia canadensis	ECHAMP	the drug picture. The dried	underground	parts are only listed in the FP.		
Coniza canadensis,		To be changed in column	1 and 3			
Erigeron canadensis / Erigeron	ECHAMP	Conyza canadensis (in na	ame of the sto	ock)		

Section number and heading	Interested	Comment and Rationale	Outcome
control number and heading	party		
	party	to be added: written in red	
canadensis, Erigeron		Fresh aerial parts of Conyza canadensis (L.) Cronquist, collected at	
		flowering time. (in definition of the raw material)	
		Comment/Rationale	
		Spelling in the GHP Conyza, not Coniza.	
		This is the correct botanical name.	
Corallium rubrum		To be changed in column 3	
	ECHAMP	Fragments of the calcareous skeletons of Corallium rubrum L.	
		Comment:	
		Typing error	
Crocus, Crocus sativus		To be changed in column 2	
	ECHAMP	Ph. Eur. 1624 (GHP)	
		Comment/Rationale	
		The number of the Ph. Eur. Monograph is not correct,	
		current: Ph. Eur. 2092 (GHP),	
		please adapt: Ph. Eur. 1624 (GHP)	
Dioscorea villosa / Dioscorea		GHP has listed the fresh underground parts, which are also mentioned in	
villosa	ECHAMP	the drug picture. The dried underground parts are only listed in the FP.	
Euphorbium		To be added in column 1	
	ECHAMP	Euphorbium/ Ephorbia resinifera	
		Comments/Rationale	
		We recommend to include the first traditional French Latin name.	
Euphrasia, Euphrasia		To be added (red)	
officinalis / Euphrasia	ECHAMP	GHP/FP/GHP	

Section number and heading	Interested	Comment and Rationale	Outcome
	party	to be added: written in red	
officinalis / Euphrasia ferm 33c			
		Whole fresh plants of Euphrasia stricta D. Wolff ex J.F. Lehm. and	
		Euphrasia officinalis L. subsp. rostkoviana (Hayne) F. Towns., their	
		hybrids and mixtures thereof, collected at flowering time / Whole fresh	
		flowering plant of Euphrasia stricta D. Wolff ex J.F. Lehm. and/or	
		Euphrasia rostkoviana Hayne and/or their hybrids and/or their mixtures /	
		Whole fresh plants of Euphrasia stricta D. Wolff ex J.F. Lehm. and	
		Euphrasia officinalis L. subsp. rostkoviana (Hayne) F. Towns., their	
		hybrids and mixtures thereof, collected at flowering time	
		To be included in column 1	
Ferrum sesquichloratum	ECHAMP	(Other name: Ferrum muriaticum)	
solutum, Ferrum		Comment/Rationale	
sesquichloratum /Ferrum		Ferrum muriaticum is a homeopathic name traditionally used in France but	
muriaticum		this name does not come from the FP (i.e there is no monograph). We	
		therefore recommend to leave this name as (other name: Ferrum	
		muriaticum)	
Ferrum sulfuricum		To be added in column 2	
	ECHAMP	Ph. Eur. 2340 (GHP)	
		Comment/Rationale	
		In the GHP reference is made to the Ph. Eur. Monograph for Ferrous	
		Sulfate, dried. We suggest mentioning Ph. Eur. and GHP, analogously to	
		the rest of the list.	
Filipendula ulmaria, Spirea		To be added (red)	
ulmaria / Filipendula ulmaria ferm 34c	ECHAMP	GHP/GHP	
		Fresh underground parts of Filipendula ulmaria (L.) Maxim. / Fresh aerial	
		parts of Filipendula ulmaria (L.) Maxim., collected at flowering time	

Section number and heading	Interested	Comment and Rationale	Outcome
	party	to be added: written in red	
Spirea ulmaria		To be added in column 3	
	ECHAMP	/ Fresh blooming flower heads of Filipendula ulmaria (L.) Maxim. (=	
		<u>Spiraea ulmaria L.)</u>	
		Comments/Rationale	
		The French monograph is officially translated into English and published	
		on the ANSM website. The translation of the raw material is: Fresh,	
		blooming flower heads.	
Fucus vesiculosus / Fucus		GHP has listed the dried thallus, which is also mentioned in the drug	
vesiculosus, Fucus	ECHAMP	picture. The fresh thallus is only listed in the FP.	
O		To be added in column 3	
Geranium robertianum	ECHAMP	Fresh aerial parts of Geranium robertianum L. Collected at flowering time /	
	ECHAMP	Whole fresh flowering plants of Geranium robertianum L.	
Gentiana lutea / Gentiana lutea		To be added in column 1	
Gentiaria lutea / Gentiaria lutea	ECHAMP	Gentiana lutea, ethanol. Decoctum	
		Comments/Rationale	
		We recommend to add in the name's column "Gentiana lutea, ethanol.	
		Decoctum." Indeed there is another stock monograph in the GHP with the	
		exactly same raw material. The method of preparation is homeopathic	
		acc. to Ph.Eur. (2371 method 1.2.11). In the homeopathic literature, the	
		method of preparation is less significant (even not known) compared to	
		the raw material definition.	
		To be added in column 3	
		Fresh underground parts of Gentiana lutea L. / Fresh underground parts	
		of	

Section number and heading	Interested	Comment and Rationale	Outcome
	party	to be added: written in red	
		Gentiana lutea L.; harvested in spring	
		Comments /Rationale	
		To be added at the end as included in FP definition	
Ginkgo biloba / Ginkgo biloba		To be added in column 1	
Chingo bioba / Chingo bioba	ECHAMP	Ginkgo biloba, Ginkgo / Ginkgo biloba	
		Comment/Rationale	
		Please add "Ginkgo" as synonym, according to the GHP monograph.	
Hedera helix		To be changed in column 2	
	ECHAMP	Ph. Eur. 2092 (GHP)	
		Comment/Rationale	
		The number of the Ph. Eur. Monograph is not correct,	
		current: Ph. Eur. 2030 (GHP),	
		please adapt: Ph. Eur. 2092 (GHP)	
Hydrargyrum chloratum,		To be added in column 2	
Mercurius dulcis / Mercurius dulcis,	ECHAMP	GHP / FP	
		Comment/Rationale	
Hydrargyri subchloridum		The reference to the relevant pharmacopoeia monographs is missing (the	
		cell is empty).	
Lycopus europaeus / Lycopus		To be amended in column 1	
europaeus	ECHAMP	Lycopus	
		Comments/Rationale	
		The FP name is only "Lycopus" in both cases. Indeed the FP permits both	
		species. We recommend to correct to be in accordance with the FP name.	

Section number and heading	Interested	Comment and Rationale	Outcome
	party	to be added: written in red	
Lycopus virginicus / Lycopus		To be amended in column 1	
virginicus	ECHAMP	Lycopus	
		Comments/Rationale	
		The FP name is only "Lycopus" in both cases. Indeed the FP permits both	
		species. We recommend to correct to be in accordance with the FP name.	
Berberis aquifolium, Mahonia		To be added in column 2	
aquifolium	ECHAMP	GHP	
		To be added in column 3	
		Dried bark from branches and twigs and dried tips of twigs of Mahonia aquifolium (Pursh) Nutt.	
		Comment/Rationale	
		The substance is not only considered in the FP, a monograph also exists	
		in the GHP. According to the German tradition, the bark of the aerial parts	
		is used, as is already written in GHP 34.	
		We also ask for the addition of the material Berberis aquifolium according	
		to GHP. To prove the use in homeopathy, literature is attached (see	
		reference).	
		Comment	
		There is also a monograph for Mahonia aquifolium at the GHP that	
		concerns the bark of Mahonia aquifolium Nutt. (but not from the root). We	
		would like to make sure that it is not an omission.	
Melilotus officinalis / Melilotus		To be changed in column 3	
officinalis, Melilotus	ECHAMP	Fresh aerial parts of Melilogtus officinalis (L.) Lam., without woody stems,	
		collected at flowering time / Fresh aerial flowering part of Melilotus officinalis (L.) Lam.	
		Comment/Rationale	

Section number and heading	Interested party	Comment and Rationale	Outcome
party		to be added: written in <mark>red</mark>	
		Typing error, Melilogus → Melilotus.	
Menyanthes trifoliate		To be added in column 1	
	ECHAMP	Menyanthes trifoliate / Menyanthes	
		Comment/Rationale	
		The raw material Menyanthes trifoliate (acc. to FP) is also the raw material	
		for the homeopathic substance Menyanthes in the German homeopathic	
		tradition. The preparation of the mother tincture is not specified in the	
		current GHP (HAB 1), but in the GHP 34. We ask to amend "Menyanthes"	
		as synonym, because this term is used in the in the Kommission D Monograph and in the GHP 1934 Monograph (please find both literature	
		references attached).	
Moschus		To be added in column 1	
	ECHAMP	Moschus / Moschus moschiferus	
		Comment/Rationale	
		The raw material Moschus (acc. to FP) is also the raw material for the	
		homeopathic substance Moschus / Moschus moschiferus in the German	
		homeopathic tradition. The preparation of the mother tincture is not	
		specified in the current GHP (HAB 1), but in the GHP 34. We ask to amend "Moschus moschifera" as synonym, because this term is used in	
		the Kommission D Monograph and in the GHP 1934 Monograph (please	
		find both literature references attached).	
Nasturtium officinale		To be added in column 1	
	ECHAMP	Nasturtium officinale, Nasturtium aquaticum	

Section number and heading	Interested	Comment and Rationale	Outcome
	party	to be added: written in red	
		<u>Comment/Rationale</u> Please add "Nasturtium aquaticum" as synonym, according to the GHP	
Netrium chloretum / Netrum		monograph.	
Natrium chloratum / Natrum muriaticum ECHAMP		<u>To be changed</u> Ph. Eur. 0193 (GHP/FP) Sodium chloride NaCI. The stock corresponds to the sea salt that complies with the requirements of the sodium chloride	NEW - PROPOSAL
		 <u>Comment/Rationale</u> 1. Typing error, "0" is missing in monograph-number 2. In neither the GHP, the FP nor the Ph. Eur. monograph sea salt is specified for the stock, therefore we ask to delete this definition. 	
Kiefernnadelöl (Pini		To be added (red)	
aetheroleum)	ECHAMP	DAB	
		Fresh pins, tips of twigs or fresh branches with pins and tips of twigs of	
		Pinus silvestris L. or other pine species	
Podophyllum peltatum, Podophyllum / Podophyllum peltatum,	ECHAMP	GHP has listed the fresh underground parts, which are also mentioned in most of the drug pictures (some only mention the fresh rhizomen). The dried rhizomen is only listed in the FP.	
Podophyllum			
Rhododendron	ECHAMP	To be added in column 1 Rhododendron /Rhododendron chrysanthum	
		To be added in column 2 GHP / French tradition	

Section number and heading Interested		Comment and Rationale	Outcome
	party	to be added: written in red	
		To be added in column 3	
		Dried leafy twigs of <i>Rhododendron campylocarpum</i> Hook. f. or <i>Rhododendron aureum</i> Georgi, their hybrids, or mixture thereof (change: update GHP 2014)./ Fresh leafy branches with flower buds of <i>Rhododendron aureum</i> Georgi or <i>Rhododendron campylocarpum</i> Hook. f.	
		Comments/Rationale There should be no reference to pharmacopoeia version.	
Rhododendron ferrugineum	ECHAMP	Substance to be added to the fifth list The following definition of the raw material should be added FP: Fresh young leafy branches of Rhododendron ferrugineum <i>L</i> .	
Dalmatinische Salbeiöle / Salviae aetheroleum	ECHAMP	To be added (red) DAC/Ph. Helv Aerial parts of Salvia officinalis L.	
Serenoa repens, Sabal serrulatum / Sabal serrulata	ECHAMP	GHP has listed the fresh ripe fruit, which is also mentioned in the drug picture. The dried ripe fruit is only listed in the FP.	
Silicea	ECHAMP	Definition of the raw material according to 2nd list: Ph. Eur. 0434 (FP) Silica, colloidal anhydrous SiO ₂ (ignited substance) It should be added the following definition of the raw material: HAB / DAB: [German Homeopathic Pharmacopoeia and German Pharmacopoeia: Gefälltes Siliciumdioxid (precipitated silica SiO ₂]	
Silicea (Acidum silicicum, precipitate)	ECHAMP	Substance to be added to the fifth list Definition of the raw material according to 2nd list: Ph. Eur. 0434 (FP) Silica, colloidal anhydrous SiO ₂ (ignited substance)	
		The following definition of the raw material should be added: GHP / DAB: [German Homeopathic Pharmacopoeia and German Pharmacopoeia: Acidum silicicum, precipitate ("Gefälltes Siliciumdioxid")]	

Section number and heading	Interested	Comment and Rationale	Outcome
party		to be added: written in <mark>red</mark>	
		<u>Comment/Rationale</u> To prove the use in homeopathy, literature of Commission D is attached (see annex II).	
Silybum marianum, Carduus		To be amended in column 3	
marianus / Carduus marianus,	ECHAMP	Mature fruit, devoid of the pappus, of Silybum marianum L. Gaertn.er	
Silybum marianum		Comment/Rationale	
		To be compliant with the monograph this should read: "Gaertn."	
Smilax, Sarsaparilla /		To be amended in column 3	
Sarsaparilla, Smilax medica	ECHAMP	Dried underground parts of Smilax regelii Killip. et C. V. Morton, Smilax	
		medica Schlechtend. et Cham. or other related species / Dried	
		underground parts of Smilax aristolochiifolia Mill. (S. medica Schltdl et	
		Cham.) and related species	
		Comment/Rationale	
		To be compliant with monograph it should read: "Killip" not Kill. and	
		"Schltdl." not Schlechtend.	
Solanum dulcamara,		To be amended in column 3	
Dulcamara / Dulcamara	ECHAMP	Fresh shoots of Solanum dulcamara L., collected prior the flowering / Fresh	
		young blooming leafy-stem with leaves of Solanum dulcamara L.	
		Comment/Rationale	
		The French monograph is officially translated into English and published	
		on the ANSM website. The translation of the raw material is: Fresh,	
		young, blooming leafy-stem	
Teucrium scorodonia /		To be modified in column 3	
Teucrium scorodonia	ECHAMP	Fresh aerial parts of flowering plants of Teucrium scorodonia L. / Fresh	
		flowering aerial parts of Teucrium scorodonia L.	

Section number and heading	Interested	Comment and Rationale	Outcome		
	party	to be added: written in red			
		Comment/Rationale			
		"Part" is singular in the FP.			
Urtica dioica		To be changed in column 2			
	ECHAMP	IP Ph. Eur. 2030 (GHP)			
		Comment/Rationale			
		The number of the Ph. Eur. Monograph is not correct,			
		current: Ph. Eur. 1626 (GHP),			
		please adapt: Ph. Eur. 2030 (GHP)			
Urtica urens/ Urtica urens		To be added in column 1			
	ECHAMP	Urtica urens, Urtica/Urtica urens,			
		Comment/Rationale Please add "Urtica" as synonym, according to the GHP monograph.			
Valeriana officinalis, Valeriana/		To be added in column 2			
Valeriana officinalis	ECHAMP	MP GHP / FP			
	To be added in column 3				
		Dried, whole or fragmented underground parts of Valeriana officinalis L.			
	s.l., including the rhizome surrounded by the roots and stolons. / Fresh				
		underground parts of Valeriana officinalis L.			
Veronica officinalis, Veronica To be added in column 2 .		•			
ECHAMP GHP / French tradition					
		To be added in column 3			
		Fresh aerial parts of Veronica officinalis L. Collected at flowering time /			
		Whole fresh flowering plants of Veronica officinalis L			

Section number and heading	Interested	Comment and Rationale	Outcome
	party	to be added: written in red	

Attached documents:

Annex I (zip folder)

- Baptisia Homöopathisches Arzneibuch 1934
- Baptisia tinctoria (Baptisia), Kommission D, 1987
- Berberis aquifolium, Homöopathisches Arzneibuch 1934
- Berberis aquifolium, Leesers Lehrbuch der Homöopathie, Band III: Pflanzliche Arzneistoffe 1, 1973
- Mahonia aquifolium (Berberis aquifolium), Kommission D, 1987
- Euphrasia_ferm 33c, GHP
- Filipendula_ferm 34c, GHP
- Menyanthes Homöopathisches Arzneibuch 1934
- Menyanthes trifoliata (Menyanthes), Kommission D, 1987
- Moschus Homöopathisches Arzneibuch 1934
- Moschus (Moschus moschiferus), Kommission D, 1987

Annex II (pdf document)

For the substances "Acidum silicicum precipitate", "Calcium sulfuricum" and "Natrium chloratum" homeopathic use is verified by the pharmacopoeia listed above and by the following bibliographic references:

Name of the stock	Bibliographic references				
	Monographs of Kommission D, "Description of the homeopathic remedy" [1]	Homoeopathic materia medica [2]	A dictionary of practical materia medica [3]	The encyclopedia of pure materia medica [4]	
Acidum silicicum precipitate	x	x	x	x	
Calcium sulfuricum	x	x	x	x	
Natrium chloratum	x	x	x	x	

Literature

- Germany, BfArM, German Federal Gazette 10. October 1985, BAnz 190a (documents as attachment)
- William Boericke and Oscar E. Boericke, 1927, Homeopathic Materia Medica, ISBN 0766183882, http://www.homeoint.org/books/boericmm/index.htm
- [1] [2] [3] John Henry Clarke ,M.D.A Dictionary of Practical Materia Medica, third Edition 1991, Homoeopathic Book Service, Sittingbourne http://www.homeoint.org/clarke/index.htm
- Timothy F. Allen, A.M., M.D., Encyclopedia of pure materia medica, 11 Bände, Boericke and Tafel, New York, 1874-1879http://homeoint.org/allen/index.htm [4]