



Homeopathic Medicinal Products Working Group (HMPWG)  
Sixth List Entries of Stocks for which Homeopathic Use is justified

release to HMA 12.12.2017  
deadline for comments 02.04.2018

## Template for submission of comments on draft document

<b>DISCUSSION IN THE SUBGROUP</b>	<b>24 October 2017</b>
<b>ADOPTION BY THE HMPWG for public consultation</b>	<b>06 December 2017</b>
<b>TRANSMISSION TO HMA for release for consultation</b>	<b>12 December 2017</b>
<b>DEADLINE FOR COMMENTS</b>	<b>2 April 2018</b>

*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**

Sixth Draft List Entries of Stocks for which Homeopathic Use is Justified

Released for public consultation on 12 December 2017 until 2 April 2018

Organisation or individual	Contact details (e-mail address, telephone number, name of contact person)
ECHAMP EEIG. – European Coalition on Homeopathic and Anthroposophic Medicinal Products	Rue Washington 40 B-1050 Brussels 32 2 649 94 40 <a href="mailto:amandine.oset@echamp.eu">amandine.oset@echamp.eu</a>

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
<i>Interested Party to insert its name or acronym.</i>	<i>Interested Party to insert one comment per row.</i>	<i>Leave blank (it will be completed by the Rapporteur).</i>
<i>Add rows as appropriate.</i>		

**SPECIFIC COMMENTS ON TEXT**

Section number and heading	Interested party	Comment and Rationale	Outcome
Adonis vernalis	ECHAMP	<p>To be added in:</p> <p><b><u>German name</u></b> Adonis vernalis ferm 33d</p> <p><b><u>Pharmacopoeia for detailed definition of raw material</u></b> GHP</p>	

Section number and heading	Interested party	Comment and Rationale	Outcome
		<p><b><u>Definition of the raw material</u></b>            Fresh aerial parts of <i>Adonis vernalis L.</i>, collected at flowering time              See enclosed literature</p>	
<i>Ailanthus altissima</i> , <i>Ailanthus glandulosa</i>	ECHAMP	<p>To be amended in:</p> <p><b><u>Definition of the raw material</u></b>            "...and blanches of <i>Ailanthus altissuna</i> (Mill) ..." should be "...and branches of <i>Ailanthus altissima</i> (Mill.)..."</p>	
<i>Alchemilla vulgaris</i>	ECHAMP	<p>To be amended in:</p> <p><b><u>Definition of the raw material</u></b>            "... flowering plant of <i>Alchemilla xanthochlora</i> ..." should be "... flowering plant <i>Alchemilla xanthochlora</i> ..."</p>	
<i>Anagallis arvensis</i>	ECHAMP	<p>To be amended in:</p> <p><b><u>Definition of the raw material</u></b>            "...plant of <i>Anagallis arvensis L.</i>" should be "...plant <i>Anagallis arvensis L.</i>"</p>	
<i>Argentum colloidale</i>	ECHAMP	<p>To be shifted:            "Argentum colloidale" from "French name" to "German name" (no FP)</p>	
<i>Badiaga</i>	ECHAMP	<p>To be added in:</p> <p><b><u>German name</u></b>  <i>Spongilla lacustris</i>, Badiaga</p>	

Section number and heading	Interested party	Comment and Rationale	Outcome
		<p><b><u>Pharmacopoeia for detailed definition of raw material</u></b></p> <p>GHP</p> <p><b><u>Definition of the raw material</u></b></p> <p>/Dried species of <i>Spongilla lacustris</i> L. collected in autumn</p> <p><b><u>Comment/Rationale</u></b></p> <p>As the substance is described in GHP, we ask to amend it.</p>	
Bismutum metallicum	ECHAMP	<p>To be taken out of:</p> <p><b><u>French name</u></b></p> <p><b><u>Comment/Rationale</u></b></p> <p>The reference is only GHP</p>	
Boldi folium	ECHAMP	<p>To be amended in:</p> <p><b><u>German name</u></b></p> <p>“<i>Peumus boldus</i>, Boldo” instead of “<i>Peumus boldo</i>, Boldo”</p>	
Ceanothus americanus recens, Ceoanothus recens and Ceanothus americanus siccum, Ceoanothus	ECHAMP	<p>To be amended in:</p> <p><b><u>French name</u></b></p> <p>“<i>Ceanothus</i>” instead of “<i>Ceoanothus</i>”</p>	
Chimaphila umbellata, Pyrola umbellata	ECHAMP	<p>To be amended in:</p> <p><b><u>Definition of raw material</u></b></p>	

Section number and heading	Interested party	Comment and Rationale	Outcome
		“W.P.C. Barton” instead of “W.P C Barton”	
Codeinum monohydricum	ECHAMP	To be shifted: Shift “French name” and “German name”	
Harpagophytii radix	ECHAMP	To be amended in:  <b><u>Pharmacopoeia for detailed definition of raw material</u></b> “Ph. Eur. 1095 (FP/GHP)” instead of “Ph. 1095 (FP/GHP)”	
Hyacinthoides non-scripta, Agraphis nutans	ECHAMP	To be added in:  <b><u>Pharmacopoeia for detailed definition of raw material</u></b> German tradition  <b><u>Comment/Rationale</u></b> Pharmacopeia for detailed definition is missing, we ask to amend it.	
Mangani sulfas monohydricum	ECHAMP	To be added in:  <b><u>Pharmacopoeia for detailed definition of raw material</u></b> A space between “Ph.” and “Eur.”	
Mercurialis perennis 2b	ECHAMP	To be added in:  <b><u>German name</u></b> Mercurialis perennis ferm 34c  <b><u>Definition of the raw material</u></b> Fresh aerial parts of Mercurialis perennis L., collected at flowering time  See enclosed literature	

Section number and heading	Interested party	Comment and Rationale	Outcome
<b>Remark:</b> Information is needed to justify the homeopathic use of the different stocks:	ECHAMP	<p><b><u>Berberis vulgaris e fructibus (GHP):</u></b>  <b>References:</b> see enclosed literature</p> <p><b><u>Hamamelis virginiana ex cortice summittatibusque</u></b>  <b>Pharmacopoeia for detailed definition of raw material:</b> GHP  <b>Definition of the raw material:</b> Mixture of one part of fresh bark from the branches and two parts of tips of fresh twigs of Hamamelis virginiana L.  <b>References:</b> see enclosed literature</p> <p><b><u>Helianthus tuberosus</u></b>  <b>Pharmacopoeia for detailed definition of raw material:</b> GHP  <b>Definition of the raw material:</b> Fresh tubers of Helianthus tuberosus L. collected in late autumn.  <b>References:</b> see enclosed literature</p> <p><b><u>Valeriana officinalis recens (FP):</u></b>  Fresh or dried root are being used (see enclosed concerned literature)</p>	
Stibium sulfuratum aurantiacum, Antimonium sulfuratum	ECHAMP	To be added in:  <p><b>German name</b>  “Stibium sulfuratum aurantiacum, Antimonium sulfuratum aurantiacum” instead of “Stibium sulfuratum aurantiacum, Antimonium sulfurat”</p>	
Thlaspi bursa-pastoris, Capsella bursa-pastoris	ECHAMP	To be amended in:  <p><b>Definition of raw material</b>  “Capsella bursa-pastoris (L.) Medik.” instead of “Capsella bursapastoris (L.) Medikus.”</p>	
Triticum repens, Agropyrum repens	ECHAMP	To be added in:  <p><b>French name</b>  Elymus repens</p>	

Section number and heading	Interested party	Comment and Rationale	Outcome
Vinca minor	ECHAMP	To be amended in:  <b><u>Pharmacopoeia for detailed definition of raw material</u></b> “GHP” instead of “GHB”	
Verbascum densiflorum, Verbascum, Verbascum thapsiforme	ECHAMP	Verbascum thapsiforme is not mentioned in GHP (but in the German Commission D as synonym of Verbascum). How to handle?	
Veronicastrum virginicum, Leptandra, Veronica	ECHAMP	To be added in:  <b><u>German name</u></b> We suggest adding Veronica virginica	
Whole document	ECHAMP	To be replaced: “O” for oxygen instead of “0” (zero) in chemical formulas.	
Whole document	ECHAMP	Uniform handling suggested: depict FP/GHP generally together in one line or generally separated in two lines	
Whole document	ECHAMP	In the monographs is no period at the end of the definition of the raw material. Please omit it.	
Zingiber officinale, Zingiber	ECHAMP	To be added in:  <b><u>Definition of the raw material</u></b> ...wide flat surface only  <b><u>Comment/Rationale</u></b> Last words of description Ph. Eur. are missing, we ask to amend it.	

## References

### **Adonis vernalis ferm 33d (GHP) (Literature\_JHU\_Adonis-vernalis-fern.pdf)**

GHP (Homöopathisches Arzneibuch = German Homoeopathic Pharmacopoeia). Adonis vernalis ferm 33d. MedPharm Scientific Publishers, Stuttgart, 14th Supplement 2017.

### **Berberis vulgaris e fructibus (GHP) (Literature\_JHU\_Berberis-vulgaris-fructus.pdf)**

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**Helianthus tuberosus (Literature JHU Helianthus-tub.pdf)**

Keller, Greiner, Stockebrand, Homöopathische Arzneimittel, Materialien zur Bewertung, Loseblattsammlung, Govi-Verlag, Pharmazeutischer Verlag GmbH, 6. Lieferung, Frankfurt a.M., 1995

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**Mercurialis perennis ferm 34c (Literature JHU Mercurialis-perennis-ferm.pdf)**

GHP (Homöopathisches Arzneibuch = German Homoeopathic Pharmacopoeia). Mercurialis perennis ferm 34c. MedPharm Scientific Publishers, Stuttgart, 14th Supplement 2017.

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Clarke, JH. A Dictionary of practical materia medica. 3:1496-1502

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