

**Why the recent RCVS statement on Complementary and Alternative Medicines (CAM) is effectively a ban on vets using these therapies in practice, and a complete ban may be imminent anyway. Why also the statement has far reaching implications for the delivery of quality care for animals in the UK.**

By Dr Mark Elliott BVSc VetMFGH MRCVS MLIHM PCH DSH RSHom

A recent on-line petition started by a member of the public in response to the recent RCVS statement on CAM collected over 10,000 signatures in a matter of days and is still growing. The RCVS called for it to be taken down as it says it has not banned Homeopathy.

Is that true? If so what does the RCVS statement of November 3<sup>rd</sup> actually say and mean? Why even then make such a statement?

This is my take on the matter.

The RCVS has in fact made a statement that effectively prevents Vets from practicing any form of medicine or treatment that it deems not to have a recognised evidence base, and/or sound scientific principles.

This is because a key point in the statement is that it makes clear any delay or denial of treatments the RCVS recognises as fitting their criteria could (in their opinion) precipitate a welfare issue. In doing so it implies that Vets are at risk of facing disciplinary action by the RCVS if they use any treatment that delays or denies medicines they do approve of.

By extension logic suggests owners of animals using CAM therapies, even if from an holistic vet, will also necessarily be in the frame when one considers the intention of the Animal Welfare Act legislation.

The RCVS does not make clear to anyone what it deems to be a recognised evidence base, nor what are sound scientific principles, so the statement leaves even that open to interpretation. This leaves any defence an individual Vet might advance if a case is taken against them at the mercy of the Disciplinary Committee, which is the court in which cases against Vets accused of serious professional misconduct are heard.

The Disciplinary Committee adjudicates on cases based on the Law of the land, insofar as its remit allows, guided by the Veterinary Surgeons Act and the RCVS Code of Conduct. While it is appointed by an independent board, the RCVS Council creates the regulatory framework.

Professional regulations and the Code of Conduct are part of a monopoly that the RCVS is charged to regulate responsibly.

Scientific studies, together with the personal experiences of millions of people, have shown that complementary medicine, including homeopathy, greatly

contributes to better health in both humans and animals. This is precisely why the WHO urges member states to include traditional and complementary medicine in their national health policies and systems.

One argument frequently used is that homeopathy (and other CAM modalities) are not based on “sound scientific principles”, phraseology falsely implying that being “scientific” means being able to explain, understand, or rationalize. The role of science is not to be “rational”; it is to put forward questions or hypotheses and then to test them. Such investigation has been done many times for many CAM modalities, including homeopathy, and there is sufficient clear evidence available to make the health authorities take notice and investigate further.

By stating that CAM, and Homeopathy in particular, has NO evidence of effectiveness, the RCVS makes clear it has rejected ALL the evidence in the world that shows it works, as well as ALL the clinician experience and successful practices built on it, as well as ALL the evidence of the many cases that previously, as well as currently, are benefitting from its use. The RCVS Council seems to have no doubt that it cannot work despite the evidence to the contrary, and so Vets facing charges can arguably have no fair trial as any defence they might advance cannot be accepted if this is so.

### **So why has it done this?**

The RCVS singled out Homeopathic treatment as a particular consideration in addition to CAM in general. This is consistent with the EASAC statement of September 2017 on Homeopathic products and practices. It is also consistent with that report’s scoping document and call for experts that, whilst seeking to take a similar approach to herbal medicines and supplements in the future, decided and advised its panel that it “might be prudent to focus any initial effort on homeopathy”. In presenting that document EASAC established what, on the face of it, was an incredibly biased remit for the panel to consider, Homeopathy had no right of reply or any consideration given to the evidence supporting its use, no other conclusion than its demise could be reached or was to be considered. Discredited argument was presented as fact, and plans to discuss ways to achieve its aims with experts in social sciences (social engineering in effect) and policy makers were presented. The RCVS have confirmed this document was considered before the November Council Meeting, this might explain why it has made statements about evidence it cannot substantiate at this time and the decision it came to. In doing so did it actually consider the scoping document and the bias applied in that? Did it want to? Interestingly statements saying there is NO evidence for Homeopathy contradict it’s own Science Committees observations earlier in their debate.

The RCVS Councils decision to publish its CAM statement may also be explained by information obtained recently under FOI request - that is that the Standards Meeting in January 2017 is reported as having “felt” some sort of stance was required “to support evidence based medicine and to directly curtail alternative practices” as it “felt” these had “no scientific basis”.

This is akin to the Danny Chambers petition to ban Homeopathy where many of those signing stated they were doing so as they did not “believe” in Homeopathy. It is notable that that petition took 6 months to attract only 2500 signatures in a campaign to ban Homeopathy, despite extensive lobbying of the profession as well as national and social media coverage. The public petition against the RCVS statement on CAM raised 10,000 in a matter of days.

It also has analogy to the Campaign for Rational Veterinary Medicine (CVRM) (the group seeking to ban CAM in the UK for Vets as well as seemingly appointing themselves censors of the profession) describing in recent letter to the Vet Record their beliefs regarding Homeopathy.

One cannot claim that there has been an objective rational scientific analysis of the situation when feelings and beliefs drive the process and evidence is ignored.

It is also the case that majority consensus opinion does not increase the scientific validity of any opinion. The history of medicine repeatedly illustrates this as new insights and evidence emerge.

*"I believe there is no source of deception in the investigation of nature which can compare with a fixed belief that certain kinds of phenomena are IMPOSSIBLE." - William James*

Good science must continually doubt and question it's own views.

The RCVS is required to be fair and open in the way it works, and should ensure that it is respected by both the public and the profession.

Many might now argue that it has lost the moral integrity to so discharge its duties in this debate in making and publishing the statement of 3<sup>rd</sup> November 2017 as it has – read on.

### **Who and what else is affected?**

There are many commonly used therapies that fall under the definition of CAM including Acupuncture, Herbal Medicines, some forms of Laser therapy, Chiropractic, and Nutraceuticals (supplements) to name a few. All are widely, and ever more commonly, used in practice so most practices in the UK are impacted upon in some way. Many are on the EASAC and CVRM target list once they are done with Homeopathy.

In the last RCVS Manpower survey that asked the question (2012), the number of Vets using one or more types of CAM claiming a speciality were around 4%; this is likely now to be many more as demand has been growing. This clearly is not helpful to the pharmaceutical industry as many CAM medicines cannot be patented, and with returns on research and development falling CAM is a threat to profitability.

However, widening the debate one quickly realises that key financial pillars of the profession – continual re-vaccination, promoting neutering as a health benefit, promoting food sold in practices as of particular benefit etc. are all now among those issues that must now be exposed to further debate as they do not fit the RCVS criteria of being evidence based or based on sound scientific principles.

There are also many commonly used therapies in mainstream practice that don't have a recognised evidence base, may be innovative and in development, and may be even just the use of drug combinations that have not been fully trialled and tested for efficacy and safety, but experience says they work. These arguably now all need looking at in detail.

The Statement identifies prophylaxis as a particular concern. It states “Veterinary Surgeons should not make unproven claims about any treatments, including prophylactic treatments”.

This is particularly topical in light of the on-going accusations that some in the profession are profiteering by insisting on annual re-vaccination of pets (and horses), re-starting lapsed courses and promoting concepts such as “Vaccination Amnesties” in the absence of any evidenced need. The defence to that argument often being that protocols are based on marketing authorisations for vaccines, which conveniently ignores the fact that these only require minimum durations of immunity to be shown and nowhere do they reference starting again – so in fact the arguments for re-vaccination are actually based on a lack or lack of examination of the evidence! Irrespective of the lack of evidence base, it is quite simply not good science either. How then does the RCVS view that issue now? Surely they must now be duty bound to investigate the profession as a whole as that evidence which is available supports much longer intervals between vaccinations, and arguably that re-vaccination may not need doing at all.

Prophylaxis is in fact much wider than the vaccination debate though. It encompasses such practices as the use of antibiotics in disease outbreaks to protect groups of farmed animals; the growing successful and responsible use of herbal and botanical substances, and homeopathic nosodes, in farming to reduce reliance on those same antibiotics (widespread across Europe and growing in the UK) to hit government targets. Do these initiatives all now have to stop?

What of the massive use of pesticides on pets to prevent possible, even at times arguably improbable, illness from infection, when that use itself has potential for impacts on human health and well-being from repeat exposure? And that is quite apart from worries over contamination of the environment and the insect declines now causing international concern.

What of widespread sales of worming products and advice that owners must worm their pets regularly? It is reported, as I write, in one of the industries main publications, that Norwegian Vets, who are not allowed to sell prescription only medicines and so cannot profit from recommending them, don't routinely worm adult dogs. This is stated clearly as because there is no need, not because they don't bother. Is in fact the same situation true in the UK?

However one looks at this, it becomes ever clearer that the RCVS claiming of the moral high ground, on the basis that Vets practice evidence based medicine, and that Vets must always use medicines on the basis of sound scientific principles will have far reaching implications as the profession is put under the microscope. Veterinary practice could look very different in a few years time from what we know today, and from what we have got used to over many years.

It is also understandable the public has interpreted the RCVS statement in such a way that it considers the RCVS Council to be led by the nose by vested outside interests, and that it is influenced by bias within its ranks. Whether it is or not, that is not for me to say, but it is for the RCVS to answer in my opinion.

Current Council Members are commenting now on this matter on forums and social media. Suspicion and concern over the RCVS intentions are not helped by RCVS staff responses to the public adding the word “replace” as regards accepted treatments. This is just fuelling the controversy, it is even more draconian and further restriction of both clinical freedoms from Vets and the public's right to decide how their animals are treated. It rightly affects the reputation of the RCVS adversely if inconsistent messages are sent out, and rightly the public is angry at the removal of any recognition that they have a role in making an informed choice for their animals.

The British Association of Homeopathic Veterinary Surgeons has published a statement that covers many very important points and raises more questions that the RCVS must answer. These include how and why RCVS felt the need to issue this statement without appropriate consultation with stakeholders including the public and those of its members directly and adversely affected by their pronouncements. Why it has stepped outside its remit to get involved in debates over differences of scientific opinion? Did it use funds for the “extensive legal advice” in a manner compliant with its remit? How it will compensate those affected by this change - arguably most practices in the UK now, but very certainly the Homeopathic using ones - some of which are already closing? How will this statement not stifle innovation and research of new unproven therapies to benefit animals? How it can seek to override UK and EU legislation that provides for (and requires in some circumstances - e.g. organic farming) Homeopathy to be available?

Notably why has RCVS not changed the Code of Conduct if it so strongly believes its position is tenable - reports of the Council's debates on this issue suggest that it is precisely because it fears exactly the points I raise - of the rest of the profession's practices being closely examined, as the new “rules” would then apply to all.

### **So what does the future hold?**

Sitting RCVS Council Member Chris Barker posted on Vetsurgeon.org forum a statement clarifying the RCVS position for the profession. I asked him for a

statement I could publish. This then is his personal comment, and cannot be seen as a definitive statement of RCVS Policy.

*'Perhaps a little clarification to help... Homeopathic remedies have a recognised legal status under the Veterinary Medicine Regulations, courtesy of an EU Directive. However much I may disagree with this nonsensical 'equivalence', it sits there enshrined in current Law, and therefore the use of such remedies cannot be declared 'illegal'. There will be the opportunity post-Brexit for representation to be made to the Veterinary Medicine Directorate to request the removal of this anomaly, but that is for another time.*

*It seems to me that what this statement does is to establish the limited circumstances in which the College might consider the use of homeopathic remedies to be 'rational', as complementary, not alternative therapies. In the event that the use of homeopathic remedies delays the use of a medicine which has proven scientific benefit in a particular condition, and should this be brought to the attention of the RCVS, then I would expect that the PIC/DC would be asked to consider the facts and circumstances of the individual case with, as in all matters, the main consideration being the safeguarding of animal welfare.'*

The reference to the opportunity Post-Brexit is worrying, and confirms reports of Chris urging the RCVS to apply pressure on the VMD at the June Council meeting. The inference has to be that the RCVS may well seek a complete ban as and when it is able to do so. One has to suspect that the RCVS CAM statement can only have been written as a prelude to a future Code change following RCVS lobbying for a legislative change. Should that follow then CAM will no longer be available in the UK for animals as no Vet is going to be able to work every day looking over their shoulder worried about being disciplined, even struck off, just for trying to care and do their best for the patient.

Medical options will become extremely limited, owners with animals currently doing well on CAM therapies may be denied access to those medicines, and ultimately animals may even have to be euthanased as effective treatments are withdrawn.

The public should therefore not be misled by RCVS protestations that it has not banned homeopathy, as it arguably has in effect, and for now has only omitted the word "yet".

Chris's comments on how the RCVS statement does establish limited circumstances under which disciplinary action could now be considered are echoed by Council Member Danny Chambers who has posted on the internet regularly on this issue. He has stated *"This statement does mean that Vets are accountable for any suffering caused due to Homeopathy and could be subject to Disciplinary Action"*

This is despite little consideration in the CAM statement or those comments of the fact that no medicine works every time, in every case, whether conventional or not. It is a warning that if any homeopathic remedy fails at all then the

prescribing Vets may be charged. Not exactly a fair or level playing field, and especially so when the evidence base for much of what is promoted by the RCVS as acceptable, is by its own admission, poor at best.

Danny Chambers has also stated *"For several years many of us have been concerned about the welfare implications of animals being prescribed homeopathy, and have been working and lobbying to get the Royal College of Veterinary Surgeons (RCVS) to update their position on this."*

Of course ANY Vet that commits an offence under the Animal Welfare Act is likely to face disciplinary action so what's new?

Recent FOI request made to the RCVS regarding whether there was any evidence of an Animal Welfare issue as a direct result of using CAM therapies produced the following response

*"We are not aware of any disciplinary cases brought by the RCVS following a conviction or animal welfare issues as a result of using CAM therapies"*

So why make this statement then? How can Danny Chambers make his comments as a sitting member of RCVS Council and also a member of the BVA policy committee, with the responsibilities those posts require? I would again argue that it can only be as there is an intention in the process. Why else would past-Presidents named by Danny Chambers on Facebook as supporting and encouraging, help him in his campaign against CAM practicing colleagues when he is peddling misinformation that is so obviously wrong?

It is worth repeating - there have been NO cases ever found against Vets who practice Homeopathy from using Homeopathy, and the previous RCVS statement on the issue also confirmed this

From RCVS by email March 2017

*"Whatever views there may be within the veterinary profession it is clear that there is a demand from some clients for complementary and alternative therapies. It is better that they should seek advice from a veterinary surgeon - who is qualified to make a diagnosis, and can be held to account for the treatment given - rather than turning to a practitioner who does not have veterinary training. That is why RCVS has in the past published in the Register a list of veterinary surgeons who hold homoeopathic qualifications. Now that we have updated the "Find a Vet" part of the RCVS website ([www.rcvs.org.uk/findavet](http://www.rcvs.org.uk/findavet)) so that the public can find and choose veterinary practices who offer complementary treatments we feel this is more helpful than publishing a list of practitioners in the Register."*

*"Any decision by the Government on NHS funding of homoeopathy does not change the position that homoeopathy is accepted by society, recognised in UK medicines legislation and does not in itself cause harm to animals. While this is the case, it is difficult to envisage any justification for banning a small number of veterinary surgeons from practising homoeopathy."*

Doesn't this contradict the intention of the Standards Committee some 2 months previously, when they reportedly expressed desire to "directly curtail alternative practices" Is it acceptable that a regulator says one thing while planning another?

What suddenly changed to get the RCVS to its current invidious position, and thus also the impossible position vets practicing CAM have now been placed in? Why are animals being prevented from receiving therapies that clinicians find so obviously help them in every day practice?

In my opinion the RCVS actions are unprecedented and outwith its remit as it has no evidence that supports its statement. In fact quite the opposite is true as confirmed in evidence it has now provided under FOI. Disseminating false conclusions can only add to growing and damaging public distrust.

No Regulator can make rules just because it "feels" it needs to take a stance to directly curtail a body of informed opinion.

No regulator should act in a manner that conflatively damages public confidence in respected colleagues, damaging their practices such that they may have to close.

It merits repeating - the RCVS is required to be fair and open in the way it works, and should ensure that it is respected by both the public and the profession

Caring hard-working Vets now face being forced to subscribe to a body (the RCVS) to enable them to legally practice that is actively working against their interests and compromising their practices. That body previously held a position for many years that created an environment in which those Vets were encouraged to invest time and funds on training (CPD that has been accepted as valid by the RCVS) to provide therapies and evolve practices that suddenly the RCVS has now has "curtailed", and clearly intends to ban.

The RCVS statement is a complainants charter, encouraging the RCVS and others who seek to destroy CAM therapies to seek out and find cases against CAM Vets, and in particular Homeopathy prescribing Vets, where whatever is meant by an RCVS recognised treatment has been denied or delayed, irrespective of the facts that any treatment may not work every time even in the most perfect clinicians hands.

What young Vet would now consider investing in understanding these therapies that have provided so much for animals and their owners?

What practice owner can continue to invest and evolve their practice when all they have achieved can seemingly be removed on a whim?

If and when a case is brought before the Disciplinary Committee, and if the Vet is convicted, then it will be game over for CAM as no one person can fight the power of the committee.

As worded the RCVS statement clearly has the potential for wider and far-reaching consequences for animal care, and the provision of such, in the UK than it first appears.

Despite this the RCVS has confirmed that, as well as not consulting those of its members seriously now affected, it made no impact assessments, nor does it accept the need to have done so, before making its pronouncements! Is this the action of a responsible regulator?

### **So in summary**

It is my opinion the recent RCVS CAM statement is a ban in all but name, and the intention of RCVS Council (or some members of it) appears to be a future complete ban anyway. It sets a worrying precedent for removal of clinical freedom from Vets, and precludes owners making a fully informed choice as to treatment options available.

It is likely the impacts from this statement will lead to a decline in animal welfare from denial of treatments found effective in practice – the very opposite effect of what the RCVS claims it is trying to achieve.

The only logical way forward is for the statement to be retracted, and proper consultation with the public and vets involved in CAM taken forward. A way must be found for Vets to continue to practice CAM, as demanded by the public, for the benefit of the animals committed to their care, without the fear their livelihoods might suddenly unreasonably be stripped from them. If the RCVS cannot undertake to act in a fair and impartial role, now and in the future, then an alternative regulator needs to be established as soon as is practical.

### **Notes:**

Mark Elliott has sat on both the Advisory Committee (now called Standards) and the Preliminary Investigation Committee of the RCVS, and of the latter he was appointed Vice-Chairman for some years. He was an elected Member of RCVS Council for 12 years, retiring from Council in 2015.

During his time on Council he also held the Presidency of the British Association of Homeopathic Veterinary Surgeons.

Mark runs an Integrated Medical practice in West Sussex, using Homeopathy, Acupuncture, Herbs, Laser therapy and conventional pharmaceutical medicines as appropriate for his patients. More information can be found on [www.markelliott.co.uk](http://www.markelliott.co.uk)

### **Some References and further information**

On-line public petition <https://www.thepetitionsite.com/219/768/240/we-need-to-stop-the-rcvs-from-banning-homeopathic-vets-from-treating-animals/>

World Health Organisation – Traditional, complementary and integrative medicine. <http://www.who.int/traditional-complementary-integrative-medicine/en/>

The International Association for Veterinary Homeopathy [www.iavh.org](http://www.iavh.org) for research information and much more including Antimicrobial Resistance (AMR) and Homeopathic Medicine as an alternate therapy  
<http://www.iavh.org/en/why-homeopathy/antimicrobial-resistance/>

An example of the use of CAM in a modern mainstream practice format, reducing antibiotic reliance and use – <http://www.appliedbacterialcontrol.com>

European Academies Science Advisory Council – Homeopathy EASAC project proposal criteria [http://www.cam-europe.eu/dms/files/EASAC/Briefing\\_paper\\_Homeopathy\\_for\\_Smolence\\_Council\\_meeting\\_Nov15.pdf](http://www.cam-europe.eu/dms/files/EASAC/Briefing_paper_Homeopathy_for_Smolence_Council_meeting_Nov15.pdf)

European Academies Science Advisory Council – Homeopathic products and practices: assessing the evidence and ensuring consistency in regulating medical claims in the EU <http://www.easac.eu/home/reports-and-statements/detail-view/article/homeopathic.html>

RCVS Council overwhelmingly rejects position statement on CAM therapies. Vet Record doi: 10.1136/vr.j3009 – the Rejection of the first draft of a new statement in 2017. This article referenced comment from Council member and Past President Lynne Hill quoting “there are a lot of things done in veterinary medicine that don't have a lot of evidence behind them”. Also noted was that she believed requiring vets to practice evidence based medicine would halt innovation.

RCVS Council Papers June 2017 <https://www.rcvs.org.uk/document-library/rcvs-june-council-papers/>

RCVS Council statement November 2017 <https://www.rcvs.org.uk/news-and-views/news/college-publishes-complementary-medicines-statement/>

Interesting commentary on issues in the Pharmaceutical industry.  
<https://endpts.com/pharmas-broken-business-model-an-industry-on-the-brink-of-terminal-decline/>