



# Impact matrix analysis and cost-benefit calculations to improve management practices regarding health status in organic dairy farming

Project Number: 311824

## - Deliverable -

### D4.4 - Report on legal conditions and factual findings on the use of homeopathy in Europe

Due Date of Deliverable: 27.07.2015  
Actual submission to EC date: 30.09.2015  
Deliverable Lead Partner: P1 University of Kassel  
Deliverable Author(s): Lisbeth Ellinger, Markus Mayer, Susanne Hoischen-Taubner, Albert Sundrum

Dissemination Level		
PU	Public	PU
PP	Restricted to other program participants (including the Commission Services)	
CO	Confidential, only for members of the Consortium (including Commission Services)	



The research leading to these results has received funding from the European Union's Seventh Framework Programme for research, technological development and demonstration under grant agreement n°311824

## Executive Summary

**Background:** Homeopathy is a type of complementary and alternative medicine (CAM). The EC Regulation on organic livestock production promotes its use in farm practice. Moreover, the Regulation also states that animal health and welfare of treated animals should not be compromised by the use of homeopathic products. However, knowledge on the legal conditions and factual findings regarding the use of homeopathy in the EU is scarce. Therefore an overview and comparison between European countries was seen to be needed.

**Methods:** Apart of task 4.4 of the IMPRO-project, the International Association of Veterinary Homeopathy was subcontracted to undertake the assessment, which was based on an evaluation of the legal conditions, and on estimations of factual findings in Europe by veterinarian practitioners with expertise in homeopathy.

### Results

The use of homeopathic products is regulated in most European countries. However, the extent and depth of detail of the regulations vary to a high degree between countries. Homeopathy can be used for treating food-producing animals in all European countries, where a feedback was available. In these countries (except Sweden), veterinarians are allowed to prescribe and administer homeopathy. Farmers are also allowed to administer in all these countries, except for Estonia, Latvia and Lithuania. There is no obligation for veterinarians to undergo training when they want to prescribe homeopathic remedies. The obligation to keep records and the control of these records is dealt with quite differently. The same is true for the more specific regulations concerning homeopathic remedies and the related educational requirements. There are hardly any unitary remedies (without indication) registered for veterinary use in the Member States, although veterinarians, specialized in homeopathy, in general prefer to work with these remedies. It seems that the costs for this procedure are far too high for veterinary homeopathic remedies in relation to their potential revenue earning and are mainly avoided by manufacturing companies. In Member States with a tradition of the use of homeopathic remedies, homeopathic remedies are registered for both human and veterinary use. However, only veterinarians are allowed to rededicate human homeopathic products to be used for food-producing animals. On the other hand, some complex remedies (with indication) are registered for veterinary use, which can also be given by the farmer without prescription from a veterinarian.

The factual findings revealed that in most countries, farm animals are only treated with homeopathic remedies by veterinarians to a limited extend. In a few countries (Austria, Germany, France) such treatment is somewhat more common. Half of the respondents rated that they use homeopathy in more than 30% of their treatments. In countries where homeopathy is more commonly used, the respondents saw partly good options for the education and training of veterinarians in homeopathy. In most countries, the use of homeopathy on farm animals was estimated to be higher than the proportion of veterinarians using homeopathy for farm animals. However, due to the fact that only veterinarians were questioned, a considerable number of unrecorded treatments conducted by non-veterinarian practitioners and farmers can be assumed. Moreover, the quality of information received from the respondents differed considerably between countries. The results indicate that the use of homeopathy in European Countries is highly heterogeneous.

### Conclusions

The considerable heterogeneity in the legal conditions in European countries regarding the use of homeopathy emphasises the need to harmonise rules within the EU. On the other hand, the EU-Guidelines on veterinary medical products are not well adapted to the peculiarities of homeopathic veterinary products. The factual findings indicate that the expertise in homeopathy and the remedies available in farm practice varies considerably between farms and countries. According the EC-Regulation on organic agriculture, animals *shall be treated immediately* if they become sick. Alternative remedies *shall be used in preference to chemically-synthesized allopathic veterinary treatment or antibiotics, provided that their therapeutic effect is effective*. However, neither an immediate treatment nor the effectiveness of treatment, whether alternative or conventional, is ensured in farm practice. Therefore, an animal health inspection and monitoring procedure should be established which provides information on the effectiveness of treatment in farm practice to avoid prolonged suffering of diseased animals.

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## 1 Background

In the context of the production of food from animals, the issue of animal health and welfare has gained increased attention. The issue also encompasses the use of antibiotics in livestock production and concerns regarding the development of antibiotic resistance as an important topic of public health. Treatment with homeopathic products is considered by various stakeholders as an option to reduce the use of antibiotics. However, to be taken into account as a relevant and serious alternative, the effectiveness of the use of homeopathy when treating food producing animals must be ensured at least to the same degree in comparison with the use of allopathic remedies. While reductions in the use of antibiotics might be favourable from a consumer's perspective, from an animal health and welfare perspective, animals should be treated in the most effective way while minimising suffering and pain.

In the past, homeopathic remedies have been widely used to treat food producing animals (Löscher, 2006; Ullman, 2010). This is particularly the case in organic livestock production due to farmers' general reluctance towards using chemically synthesized products and due to consumer views. Furthermore, the EU Regulation (834/2007) promotes the use of phytotherapy and homeopathy in organic livestock production.

Homeopathy is a type of complementary and alternative medicine in which specifically prepared remedies are prescribe according to a modality which is very different from conventional medicine. The very complex issue of alternative treatments is not only a question of the effectiveness of the remedies themselves which needs to be proven in clinical case control studies adapted to the nature of homeopathic products, but depends also to a high degree on the context and the prerequisites when people make use of alternative remedies. These prerequisites include among others:

- expertise to formulate a profound anamnesis and diagnosis according to the leading symptoms;
- diagnosis in relation to potential resistance to therapy;
- availability of expertise on alternative treatments;
- options for the appropriate application of remedies; and
- consecutive control of effects of the given remedy on the animal and success of treatment.

While current knowledge on the effectiveness of homeopathy and phytotherapeutic remedies has recently been reviewed (Doehring and Sundrum, 2015), knowledge regarding the availability of presuppositions on the farm level which ensure a high level of treatment success with homeopathic products is scarce. Moreover, the question arises whether, and to what degree, the legislative situation in Europe fosters an appropriate use of homeopathy regarding the issue of animal health and welfare and food safety. To obtain an overview of the current legal and factual state in different European countries, a study was conducted with support from the International Association for Veterinary Homeopathy (IAVH). The aim was to provide an overview of the legislation regarding the use of homeopathy with food producing animals and to conduct a survey of practitioners to identify problematic areas and legal uncertainties.

## 2 Principles of homeopathy

Homeopathy is a system of alternative medicine created in 1796 by Samuel Hahnemann. It is based on three main principles.

First is the principle of Similarity, so called "Simile-Rule" according to which a substance that causes

certain symptoms when administered to healthy subjects can cure the manifestation of disorders and corresponding symptoms in sick individuals. Single remedies were tested by Hahnemann in an original or low diluted form on a healthy human to capture all occurring symptoms that finally define the “homeopathic drug picture”.

The second principle is individualisation. This refers to the fact that, in the case of illness, every individual shows specific person-related symptoms, the “clinical picture”. While suffering from the same causes they can considerably differ in some, if not in all, symptoms. The characteristics of the “homeopathic drug picture” of the chosen remedy should be as similar as possible to the “clinical picture” the patients show. The closest match is called the “simillium”.

The third principle is the use of the smallest dose. It is the way to choose a minimum dose of a substance that is still sufficient to cause a reaction in an organism without being harmful. The method of preparation and use of homeopathic remedies is the same for humans and animals. Homeopathy remedies are used in different dilution levels due to the specific procedure of ‘potentiation’ described in the homeopathic pharmacopoeia. The doses range from those that are similar in concentration to some conventional medicines to very high dilutions (above C12 or D24 resp. a 1: 1024 dilution) containing no material trace of the starting substance. “D” for decimal, means a dilution by a factor of 10 and “C” for centesimal for diluting a substance by a factor of 100 at each stage.

In general, two types of homeopathic remedies are available: Remedies including only one active ingredient in the starting tincture (used for classic homeopathy) and remedies combining two or more active ingredients in the starting tincture (homeopathic combination), used for complex homeopathy.

Hahnemann (1810) described health as a dynamic process and homeopathy as a possibility to stimulate self-healing or self-regulation processes in the body. Thus, limitations of treatment conditions for homeopathy are given when the body system is no longer able to react e.g. in the case of severe tissue damage or organ failure. If the cause of a disease is not eliminated and the organism weakened, the potential effects of homeopathy remedies are jeopardised.

While conventional treatments in the first place focus on the general symptoms of a disease caused by an infection with pathogens or disturbance of organ functions e.g. inflammation or fever, homeopathy tries to capture a more “holistic view” of the individual. It considers also the individual reactions of a patient towards the causes of diseases (individualised treatment). The approach of a “clinical picture” covers inter alia the causa (any influences that caused the disease), modalities (timely, physically, physiological or psychological circumstances under which the symptoms increase or decrease), (extraordinary) behaviour, constitution, general symptoms, organ symptoms, frequency of symptoms and the tendency or disposition for infection (miasma).

Apart from the principles mentioned above, no binding specifications exists that prescribe how the use of homeopathy remedies should be implemented in further detail. This leaves ample room for the users of homeopathic products to develop their own access and procedure when treating animals, bearing the risk of individualised and highly self-referential approaches. The fact that the success of treatments in general is not independently assessed and controlled, the treatment procedures in farm practice evade any verification. Nevertheless, some general rules of a *lege artis* procedure according to the duty of medical care or state of the art should be considered. This means that a certain intervention or procedure is performed in the best known way. Details of such a *lege artis* procedure, encompassing: anamnesis, examination, choice of the remedy, potency and frequency of administration, dosage, administration, and control of success are outlined in the



'Report on research projects in the field of homeopathy, cooperation between research bodies and initiatives to reduce use of antibiotics by using homeopathic remedies' (Deliverable 9.1).

Treatment with homeopathic products can be subdivided into three different approaches:

- a. **Classical homeopathy or individualized homeopathy:** Every animal and the clinical signs in the case of a disease are individual and so is the chosen remedy. With individualized homeopathy a holistic approach in respect to body, soul and spirit is employed. It covers inter alia 1. causa (any influences that caused the disease), 2. modalities (timely, physically, physiological or psychological circumstances under which the symptoms increase or decrease), 3. (extraordinary) behaviour, 4. constitution, 5. general symptoms, 6. organ symptoms, 7. frequency of symptoms, 8. miasma (tendency or disposition for infection).
- b. **Clinical homeopathy or organotropic homeopathy:** Remedy will be chosen due to the symptoms of single organs.
- c. **Complex homeopathy or combined-remedies-homeopathy:** This approach foregoes the holistic approach of the individualized homeopathy. For the treatment of diseases and symptoms, different ingredients are combined in a homeopathic combination. Homeopathic combinations are often used for livestock due to the lack of appropriate information about symptoms and the modalities of single animals.

In addition to the remedies mentioned above, the use of nosodes is seen as part of a homeopathic treatment. The nosodes come from diseased matter, prepared from microbe cultures, from viruses, fungi, pathological secretions and excretions, and are given in a highly diluted form, mainly in ultra-high potency.

### 3 Materials and Method

The following description of the European legislation on homeopathy is based on literature research and interviews with experts in the field.

#### 3.1 Investigation of the legal situation

To investigate the **legal situation** concerning the use of homeopathic remedies in livestock production in European countries, the International Association for Veterinary Homeopathy (IAVH) carried out a survey by means of a written questionnaire (see Annex 8.1). Questionnaires were sent to experts, identified by IAVH, in 29 countries. Answers were retrieved on the legal situation in 21 countries (Austria, Belgium, Bulgaria, Croatia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Italy, Luxembourg, Latvia, Lithuania, The Netherlands, Portugal, Spain, Sweden, Switzerland, and the United Kingdom. In two European Member States (Croatia and Bulgaria), no veterinarian with a background on the use of homeopathy in food-producing animals could be identified. Therefore, homeopathic companies for (human) doctors (Croatian Association for Complementary Medicine, Homeopathic Society of Bulgaria) were asked instead in order to get any information on the use of homeopathy in the specific country. No information could be gained on the situation in The Czech Republic, Cyprus, Ireland, Malta, Poland, Romania, Slovakia and Slovenia. The 21 returned questionnaires were evaluated and a comprehensive country-specific situation analysis was conducted. The report on each country was sent back to the respondents for reviewing. Answers were analysed, additional questions posed and a compilation of the answers was made.

### 3.2 Investigation of the factual situation

To assess the **factual state** of the use of homeopathy on food-producing animals, a survey of veterinarians prescribing and using homeopathy was launched. A set of 22 closed and two open questions was prepared in an online questionnaire in four languages: English, French, German, and Spanish (see Annex 8.3). An invitation to participate in the survey was sent by e-mail to 506 veterinarians along with a request to forward the invitation to other colleagues. A total of 100 answers to the online survey were received and collected in a database, transferred to excel and then analysed.

## 4 Legal conditions for using homeopathic remedies for food producing animals in European countries

### 4.1 Veterinary medicinal products under EU law

A homeopathic veterinary medicinal product is defined as “any veterinary medicinal product prepared from products, substances or compositions called homeopathy stocks in accordance with a homeopathy manufacturing procedure described by the European Pharmacopoeia or, in the absence thereof, by the pharmacopoeias currently used officially in the Member States” (2004/28/EC/Art.1(8)).

The legislation in the pharmaceutical sector for medicinal products for veterinary use are covered by Directives and Regulations, compiled in volume 5 of the publication "The rules governing medicinal products in the European Union" (COM, 2010). While Regulations are binding legislation, directly applicable without the need for national legislation, Directives set out a goal that all EU countries must achieve, leaving the implementation of national regulations to the Member States.

Rules on veterinary homeopathy are formulated in the topic of production and distribution of veterinary medicinal products in the EU, aimed at safeguarding public health and to ensure the development of industry and trade in medicinal products within the Community (Directive 2001/82/EC (2, 3)). For homeopathic remedies, a simplified registration procedure (in comparison with the officially approved registration) is possible. This procedure takes into account the particular characteristics of homeopathic products, such as the very low level of active substances and the difficulty of applying them to conventional statistical methods (2004/28/EC (20)). Registration schemes for homeopathic remedies are operated nationally and involve the submission of a relatively limited amount of information. Such information has to ensure the pharmaceutical quality and a batch-to-batch homogeneity. Specific national regulations that consider homeopathic medicinal products for food producing animals are not established in each European country. As a result, the availability and use of homeopathic remedies in food producing animals differs considerably depending on existing national regulations.

In all EU regulations for veterinary medicinal products, including homeopathic products, a basic distinction is made between homeopathic medicinal products used in food-producing animals and those used in non-food producing animals. In general, all veterinary medicinal products for food producing animals require a veterinary prescription for dispensing to the public (2001/82/EC/Art.67). To avoid unacceptable suffering of animals in the case that no authorised veterinary medicinal product is available, Directive 2004/28/EC/Art.11 establishes a cascade of rules to be followed in the case of exceptions. According to these rules, remedies dedicated for another species or a different indication may be used. In this case, a prescription from a veterinarian is always required and specific minimum withdrawal periods apply. However, article 16 of Directive 2001/82/EC

(consolidated version) explicitly formulates derogation from the “rules of cascade” for homeopathic veterinary medicinal products, provided that the active constituent in the product is mentioned in Regulation (EEC) No 37/2010 on “*Pharmacologically active substances and their classification regarding maximum residue limits in foodstuffs of animal origin*”. For food producing animals, only remedies included in the annex of Directive 37/2010/EC from a D4 dilution (one part per 10,000 of the mother tincture) up and only under responsibility of a veterinarian are allowed to be used (2004/28/EC/Art.17). About 40 homeopathic substances are allowed even in lower potency than D4. These are based on non-toxic substances, often used in phytotherapy or as feed additives. They can be used from a mother tincture on, or as a D1-D3. Some substances are completely forbidden, such as *Aristolochia* and *Colchizine* due to their toxic effects and the fact that a maximum residue limit cannot be established for these substances (37/2010/EC/Annex/Table 2). Directive 2006/130/EC allows an exception of a veterinary prescription for food-producing animals, if the remedies pose no direct or indirect risk for animals, humans or the environment, even if administered incorrectly. However, homeopathic remedies are not explicitly named in this context. The use of remedies in food producing animals shall always be documented (96/23/EC and 90/676/EEC).

An ongoing Revision of the legal framework for veterinary medicinal products (COM 2011) aims to “increase the availability of veterinary medicinal products, to reduce the administrative burden on enterprises, to improve the functioning of the internal market for veterinary medicinal products and to assess the possibilities to have an improved response to antimicrobial resistance related to the use of veterinary medicines”. The Proposal for a Regulation of the European Parliament and of the Council on veterinary medicinal products (COM 2014) will change the legislation on veterinary medicinal products to a regulation instead of a directive.

The European Council Regulations 834/2007/EC on organic livestock production support the use of phytotherapeutic and homeopathy remedies compared to antibiotics and other chemical-synthesised drugs: “... chemically synthesised allopathic veterinary medicinal products including antibiotics may be used where necessary and under strict conditions, when the use of phytotherapeutic, homeopathy and other products is inappropriate...” (834/2007EC Art. 14(1)). The Commission Regulation (EC) No 889/2008, laying down rules for the implementation of Council Regulation (EC) No 834/2007 on organic production, states in detail in Article 24 on veterinary treatment:

1. **Where** despite preventive measures to ensure animal health as laid down in Article 14(1)(e)(i) of Regulation (EC) No 834/ 2007 **animals become sick or injured they shall be treated immediately**, if necessary in isolation and in suitable housing.
2. Phytotherapeutic, **homeopathic products**, trace elements and products listed in Annex V, part 3 and in Annex VI, part 1.1. **shall be used in preference to chemically-synthesized allopathic veterinary treatment or antibiotics, provided that their therapeutic effect is effective for the species of animal, and the condition for which the treatment is intended.**
3. If the use of measures referred to in paragraph 1 and 2 is not effective in combating illness or injury, and **if treatment is essential to avoid suffering or distress of the animal**, chemically synthesized allopathic veterinary medicinal products or **antibiotics may be used under the responsibility of a veterinarian.**

## 4.2 National legal conditions in 21 European Countries

An overview of national laws regarding homeopathic treatments of food producing animals can be found in Annex 8.5. A list containing the regulatory authorities in the European Union (EU) and



European Economic Area (EEA) that are responsible for veterinary medicines is provided by the European Medicines Agency (EMA, 2015).

The questionnaire on the legal situation in different European countries was answered by contact persons in 21 countries: Austria, Belgium, Bulgaria, Croatia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Italy, Luxembourg, Latvia, Lithuania, The Netherlands, Portugal, Slovenia, Spain, Sweden, Switzerland, and the United Kingdom.

In all of these countries it is generally permitted to apply homeopathic remedies to farm animals (see Annex 8.2). In 15 from 21 countries, only veterinarians are allowed to prescribe them. In four countries also the farmer or owner of the animals is allowed to prescribe homeopathic remedies. In two countries naturopaths are allowed to prescribe homeopathic remedies to food producing animals. In Sweden, it is forbidden for veterinarians to prescribe homeopathic remedies. Also the British Veterinary Association (BVA) does not endorse the use of homeopathy, because of the issue of making therapeutic claims without proven therapeutic efficacy. The national medical association of the Czech Republic has officially declared homeopathy to be ineffective and has discouraged their members from utilising it. In Hungary, homeopathy was forbidden by law from 1949 until 1990 but has now been allowed since 1991.

While in Italy, Spain, Sweden and the United Kingdom a specific training in homeopathy is required in order to be allowed to prescribe homeopathic remedies, in most European countries, no qualification is required for a veterinarian to prescribe homeopathic remedies.

With respect to the registration and availability of homeopathic remedies, 3 situations exist:

1. In the German- and French-speaking countries, as well as in the United Kingdom many veterinary homeopathic remedies are available through different routes:
  - They are registered according to the simplified registration procedure, without proof of efficacy.
  - They are free from registration, as long as less than a certain amount of packages are sold per year (especially the remedies without indication) (Germany, Switzerland).
  - Homeopathic remedies are manufactured in the same way according to the homeopathic pharmacopeia for humans and for animals; thus there is no need for a separate registration (France, Belgium, and Austria).
  - In the United Kingdom some additional rules are introduced to keep veterinary homeopathic remedies available.
2. In a number of East-European countries, there is no law dealing with veterinary homeopathic remedies. What the veterinarians prescribe can be used, sometimes “solely in his/her responsibility” (Hungary, Croatia, and Poland). In case there are no national regulations, the EU guidelines apply. In Hungary there are, beside the EU guidelines, specific rules for alternative medicines. There is a section for alternative medicine (mainly homeopathy) practitioners in the veterinary association of Hungary.
3. A number of West-, North-, and South-European countries follow the EU guidelines, which means that each homeopathic preparation must be registered separately according to the rules of simplified registration. It seems that the costs for this procedure are far too high for veterinary homeopathic remedies in relation to their potential revenue earning and are mainly avoided by manufacturing companies. Therefore, homeopathic remedies for veterinary use are often not available.

The investigation of available homeopathic remedies showed that a number of "homeopathic combinations with indication" are registered in different countries for veterinary use. They can usually be applied without prescription by a veterinarian. Moreover, only few homeopathic remedies (without indication) for veterinary use are registered in different Member States (see Annex 8.4). A homeopathic remedy that is registered in one Member State cannot automatically be used in another Member State.

### **4.3 Country specific description**

#### **4.3.1 Legal situation in Austria**

The application of homeopathic medicines to food-producing animals but also to non-food-producing animals is regulated in the course of the amendment to the Animal Medicines Control Act (TAKG).

In Austria it is permitted to use veterinary homeopathic remedies which are registered in Austria.

##### ***Approval of homeopathic remedies for farm animals***

There is a difference between authorized and registered homeopathic remedies. An authorized homeopathic remedy must have proof of the indicated homeopathic mode of action, whereas a registered remedy has no indication, and must be diluted far enough to ensure that there is no risk in its use. For farm animals the dilution must be above D3 or C1 potency, according to the EU-regulation 37/2010. All homeopathic remedies (globules, drops, injectable products etc.) in veterinary medicine are excluded from the withdrawal period list. Doubling the withdrawal period for organic farms or complying with a minimum waiting time (at least 48 hours at 0 days for chemically synthetic medicines) does not apply to homeopathic medicinal products.

In an individual case, the veterinarian may manufacture homeopathic remedies by himself, but not to stock them, and for farm animals only with a potency of D6 or above. Registered homeopathic remedies may only be administered orally or topically. If a remedy is needed which is not permitted in Austria, permission may be sought from the "Bundesamt für Sicherheit im Gesundheitswesen".

For animals, no homeopathic remedies are registered but 88 homeopathic combinations are approved. For humans, 3250 homeopathic remedies are registered, 629 homeopathic combination remedies are approved and 50 are registered.

##### ***Prescription and administration of homeopathic remedies to farm animals***

Registered homeopathic remedies are generally free of prescription. These as well as approved veterinary homeopathic remedies, labelled with an indication may be used by the farmer without veterinary prescription.

Veterinarians are permitted to prescribe homeopathic remedies. A specific training in homeopathy is not required. Veterinarians and owners are allowed to administer them to farm animals. The owner of a farm animal is only permitted to administer homeopathic remedies on the instruction of a veterinarian, and when the farm animal is ill. The owner may administer homeopathic remedies independently to keep his farm animals healthy, but not to treat them when ill.

##### ***Documentation of treatments***

Every application of medicines, which includes all homeopathic remedies, must be documented by the user (veterinarian or pet owners). Documentation must be retained by supervisory bodies (official veterinarian, etc.) for 5 years, and must be presented by the supervising veterinarian when participating in the animal health service.

***In a nutshell***

In practice, this means that many farm animals can be legally treated with homeopathy in Austria.

**4.3.2 Legal situation in Latvia, Lithuania and Estonia*****Approval of homeopathic remedies for farm animals***

There are no registered veterinary homeopathic remedies available in the Baltic States, but few homeopathic combinations. Remedies can be bought in other countries and are also allowed to be used when they are made by a homeopathic pharmacy. Their status in the state drug agency register remains unclear. Any homeopathic remedy can be used according to Directive 2004/28/EC/Art.11 ('cascade rules').

In **Latvia**, 84 homeopathic combinations are registered for human use. One veterinary homeopathic combination is registered (Eurofit gel for intramammary use).

In **Lithuania**, 83 homeopathic combinations are registered for human use, and 7 veterinary homeopathic combinations (from Heel®).

In **Estonia**, 14 homeopathic combinations are registered for human use. No veterinary homeopathic remedies are registered.

***Prescription and administration of homeopathic remedies to farm animals***

The veterinarian is allowed to prescribe and administer homeopathic remedies to farm animals. A specific training in homeopathy is not required.

***Documentation of treatments***

There is no law about record keeping.

***In a nutshell***

Veterinary homeopathic treatment of food producing animals is not yet fully developed in the Baltic States, and so are the rules about it. The European Guidelines are followed in the Baltic States.

**4.3.3 Legal situation in Belgium**

It is permitted to use veterinary and human homeopathic remedies which are registered in Belgium to treat food producing animals. Homeopathic remedies which are made by an authorized pharmacy are also allowed, when prescribed by a veterinarian.

***Approval of homeopathic remedies for farm animals***

There are no registered veterinary homeopathic remedies, but homeopathic remedies for humans are available and can be used on animals. Only a few homeopathic combinations are allowed. The import of homeopathic combinations is only permitted if there is proof of the urgent medical necessity to prescribe it.

***Prescription and administration of homeopathic remedies to farm animals***

Veterinarians are permitted to prescribe homeopathic remedies. A specific training in homeopathy is not required. Veterinarians and owners (farmers) are allowed to administer them to farm animals.

***Documentation of treatments***

There is no obligation to keep records of homeopathic treatments because there is no withdrawal period for homeopathic remedies.

***In a nutshell***

There are no registered veterinary homeopathic remedies, but availability of homeopathic remedies for animals is given by the permitted use of human homeopathic products.

**4.3.4 Legal situation in Bulgaria**

In Bulgaria no veterinarian with a background on the use of homeopathy in food-producing animals could be identified. The information given here was given by the Homoeopathic Society of Bulgaria. The law on veterinary medicine in Bulgaria contains several provisions concerning the use of homeopathic medicines for food production animals. The medicines must be registered according to Bulgarian legal procedures, which are simplified with regards to homeopathic medicines. The basic rule is that medicines should not contain more than one ten thousandth of the homeopathic stock.

The above mentioned legal act provides references directly to European Regulation (EC) № 37/2010. It is possible to use both single remedies and homeopathic combinations in food producing animals, if manufactured in accordance to the European Homeopathic Pharmacopoeia or the homeopathic pharmacopoeia of one of the other Member States.

**4.3.5 Legal situation in Croatia**

In Croatia no veterinarian with a background on the use of homeopathy in food-producing animals could be identified. The information given here was given by the Croatian Association for Complementary Medicine.

***Approval of homeopathic remedies for farm animals***

The number of remedies that are used in veterinary homeopathy, human, or externally procured products is not known. For veterinary use, no registered remedies or homeopathic combinations are available. Only one homeopathic manufacturing company exists ('Homeolab', Zagreb). They offer about 200 individual registered remedies for human use, as well as 30 combined homeopathic creams and biochemical salts (all for human use).

***Prescription and administration of homeopathic remedies to farm animals***

There is no law on who is allowed to prescribe homeopathic remedies or to administer them to farm animals. The homeopathic association tries to use the rules from the European Central Council of Homeopaths (ECCH) for the best homeopathic education. To the knowledge of the contact person there is only one clinic in Croatia that practices exclusively veterinary homeopathy; three clinics practice veterinary homeopathy along with conventional veterinary medicine. All have gone through some kind of homeopathic education.

***Documentation of treatments***

There is no law on record keeping for treatments on farm animals.

***In a nutshell***

Veterinary homeopathy is scarcely used on farm animals in Croatia nor is it recognised by national legislation.

**4.3.6 Legal situation in Denmark**

It is permitted to use those veterinary homeopathic remedies which are registered in Denmark. It is not permitted to import them.

***Approval of homeopathic remedies for farm animals***

There are no veterinary homeopathic remedies registered. The use of human homeopathic remedies (of which about 40 homeopathic remedies and 60-70 homeopathic combinations are registered) is not permitted.

***Prescription and administration of homeopathic remedies to farm animals***

Theoretically, veterinarians are allowed to prescribe homeopathic remedies. A specific education in homeopathy is not required. Anybody may administer homeopathic products to farm animals.

***Documentation of treatments***

There is no obligation to keep records of homeopathic treatment of farm animals.

***In a nutshell***

Because of the current legal situation it is practically impossible to treat farm animals with homeopathy in Denmark. No registered veterinary homeopathic remedy is available and the use of homeopathic products for humans or imported veterinary products is not permitted.

**4.3.7 Legal situation in Finland*****Approval of homeopathic remedies for farm animals***

It is permitted to use veterinary and human homeopathic remedies which are registered in Finland and remedies (for either human or animal use) that have been permitted by the EU regulation No: 726/2004. Homeopathic remedies must be registered and remedies used in farm animals must be diluted to more than D4 potency and must be included in the Table 1 in EU No: 37/2010 of remedies that do not require MRL-values. There are no veterinary homeopathic remedies but 521 human homeopathic remedies registered.

***Prescription and administration of homeopathic remedies to farm animals***

Veterinarians are allowed to make a diagnosis and prescribe homeopathic remedies. Homeopathic products are available over the counter without a prescription and can be administered by the farmer or the owner to their animals. A specific training in homeopathy is not required.

***Documentation of treatments***

Records must be kept by the farmer. The records are subject to random checks by a government agency.

***In a nutshell***

Although there are no registered veterinary homeopathic remedies, it is possible to use human homeopathic remedies, of which 521 are registered in Finland.

**4.3.8 Legal situation in France**

In France it is permitted to use veterinary and human homeopathic remedies for farm animals. However, there is no law regarding veterinary homeopathic remedies, but there are rules laid down by the "Agence nationale de sécurité sanitaire de l'alimentation, de l'environnement et du travail (ANSES)", which is an agency of the agricultural ministry.

***Approval of homeopathic remedies for farm animals***

About 500 homeopathic remedies and 3 homeopathic combinations are authorized. Any potency is allowed. They are listed by the Agence Nationale de Sécurité du Médicament et des produits de santé (ANSM). Remedies which are made by authorized pharmacies are also allowed.



***Prescription and administration of homeopathic remedies to farm animals***

Veterinarians are allowed to prescribe homeopathic remedies. A specific training in homeopathy is not required. Any veterinary prescription must be recorded. However, many people give advice on the use of homeopathy without keeping prescription records. Veterinarians and owners (farmers) are allowed to administer them to farm animals.

***Documentation of treatments***

Records must be kept by the farmer and stored for 5 years. These can be inspected yearly by the government.

***In a nutshell***

There is no law on homeopathic remedies, but general rules. The rules on homeopathic remedies are a bit vague. At the moment, the availability and the use of homeopathic remedies for farm animals is not restricted.

**4.3.9 Legal situation in Germany**

It is permitted to use veterinary homeopathic remedies which are registered in Germany or, after informing the authorities and importing the product, in the EU.

***Approval of homeopathic remedies for farm animals***

There is a distinction between approved and registered homeopathic remedies. An approved homeopathic remedy must provide proof of efficacy in the labelled therapeutic indication. The proof can also be based on literature. Registered remedies are not necessarily linked to an indication. For farm animals the dilution must be above D4 potency according to the EU-regulation 37/2010, except for about 30 substances (food plants etc.) which can be used below D4. Pharmacies and homeopathic manufacturers are allowed to produce homeopathic remedies and if they produce less than 1000 packages a year, there is no need to register them. Nosodes are only allowed if they are sterilized first. Moreover, the remedy must be controlled with regard to safety. This makes the procedure expensive. Thus, it is seen as difficult to use nosodes.

Anyone may administer homeopathic remedies to farm animals in accordance with the package instructions, as long as the remedies are registered for the farm animal species to be treated. A total number of 34 homeopathic remedies and 129 homeopathic combinations are registered for all animals. More than 1300 homeopathic remedies and an unknown number of homeopathic combinations are registered for humans. The total number of registered remedies for human use is 4764.

***Prescription and administration of homeopathic remedies to farm animals***

Veterinarians are allowed to prescribe and administer homeopathic remedies for subcutaneous injection. Homeopathic injectables declared on the package for intramuscular use need a veterinary prescription, but they are only available in pharmacies over the counter if they are declared exclusively for subcutaneous use. For the use of registered homeopathic remedies, no special training in homeopathy is required, if the application is according to the package instructions. In farm animals, only a veterinary surgeon is allowed to use remedies for an indication or a species other than that for which it is intended. Withdrawal periods according to the cascade rule (Directive 2004/28/EC/Art.11) are not required for homeopathic remedies from a dilution of D4 (rep. 1 parts: 10 000 parts).

**Documentation of treatments**

Records must be kept by the veterinarian and by the farmer. These are controlled by the government ('Veterinäramt'), but not in detail. If the product is bought in a pharmacy, the farmer has to keep the purchase receipt of the pharmacy and has to keep records of its use.

**In a nutshell**

In Germany, it is easy to treat farm animals legally with homeopathy.

**4.3.10 Legal situation in Greece**

There are no legal homeopathic remedies for farm animals; and there are no veterinarians who prescribe homeopathic remedies for farm animals. Whether this is because homeopathic remedies for farm animals are not available or because there is no tradition in Greece to prescribe homeopathic remedies for farm animals is not known.

**4.3.11 Legal situation in Hungary**

It is permitted to use veterinary homeopathic remedies which are registered in Hungary, in the EU or anywhere else in the world. Hungarian law largely follows the EU guidelines. There are some differences concerning the postgraduate education for homeopathic veterinarians and the prescription of homeopathic remedies if no registered remedy for the species or indication is available.

**Approval of homeopathic remedies for farm animals**

In the treatment of food-producing animals, the veterinarian may use registered veterinary homeopathic medicines. If a homeopathic remedy is not available for the indication or the species, the veterinarian can prescribe (at his/her own risk) a homeopathic remedy that is registered for other indications or species.

In Hungary, only 13 veterinary homeopathic combinations are registered and no single remedy. It is allowed to prescribe for a different species or for a different indication than that indicated on the remedy, under the cascade and at the veterinarian's own risk. However, there are usually no indications on homeopathic remedies so that the user always prescribes at his/her own risk.

**Prescription and administration of homeopathic remedies to farm animals**

Veterinarians are allowed to prescribe homeopathic remedies. Postgraduate courses for homeopathy are acknowledged by the veterinary association of Hungary. However, they are not compulsory. Veterinarians and their assistants are allowed to administer them to farm animals.

**Documentation of treatments**

Records about homeopathic treatments must be kept by the veterinarian. These are controlled by the government.

**In a nutshell**

As there are hardly any registered homeopathic remedies in Hungary, this means that the veterinarian always prescribes them at their own risk.

**4.3.12 Legal situation in Italy**

It is permitted to use veterinary homeopathic remedies registered in Italy.

***Approval of homeopathic remedies for farm animals***

Human homeopathic remedies are allowed under the cascade. No veterinary homeopathic remedies but 200 homeopathic combinations are registered for use on animals. However, only a few are actually in use.

***Prescription and administration of homeopathic remedies to farm animals***

Veterinarians are allowed to prescribe homeopathic remedies. The Guidelines of the Italian Veterinary Federation say that medical advertising is only allowed after 450 hours of homeopathic training, lasting at least 3 years. Veterinarians, farmers and their assistants are allowed to administer homeopathy to farm animals. Farmers are allowed to treat their own animals with homeopathic remedies.

***Documentation of treatments***

Records must be kept by the veterinarian. These are controlled by the government (official veterinarians).

**4.3.13 Legal situation in Luxembourg**

It is permitted to use veterinary and human homeopathic remedies on farm animals.

***Approval of homeopathic remedies for farm animals***

All homeopathic remedies are made in other European countries. Homeopathic remedies which are made by an authorized pharmacy are also allowed. There are some veterinary homeopathic remedies and homeopathic combinations registered, but the list is constantly changing. The number of remedies available is unknown.

***Prescription and administration of homeopathic remedies to farm animals***

Veterinarians are allowed to prescribe homeopathic remedies. A specific training in homeopathy is not required. Veterinarians and owners are allowed to administer them to farm animals.

***Documentation of treatments***

Records must be kept by the farmer: when a remedy with a withdrawal period is prescribed, the veterinarian has to fill in a special form. These records are controlled by the Administration of veterinary services and by other EU authorities.

**4.3.14 Legal situation in The Netherlands**

In The Netherlands the EU guidelines apply. Therefore, it is permitted to use veterinary homeopathic remedies which are registered in The Netherlands.

***Approval of homeopathic remedies for farm animals***

The use of human homeopathic remedies is permitted under the cascade-rule. There are no veterinary homeopathic remedies registered, while 28 veterinary homeopathic combinations exist. 349 homeopathic remedies are registered for human use in 3183 different potencies and preparations. In addition, about 500 homeopathic combinations are registered for humans.

***Prescription and administration of homeopathic remedies to farm animals***

Veterinarians and owners (farmers) are allowed to prescribe homeopathic remedies and to administer them to farm animals. A specific training in homeopathy is not required. Farmers are allowed to treat their own animals with homeopathic remedies.

**Documentation of treatments**

Records must be kept by the veterinarian as well as by the farmer. These are controlled by the government, and also by Skal Biocontrole, the only organic control organisation in the Netherlands for organic farms.

**4.3.15 Legal situation in Portugal**

It is permitted to use veterinary and human homeopathic remedies which are registered in Portugal, the EU or worldwide.

**Approval of homeopathic remedies for farm animals**

There are no registered veterinary homeopathic remedies; but homeopathic remedies registered for human use can be prescribed for animals. The rules of the EU are applied for the use of homeopathic remedies in farm animals.

**Prescription and administration of homeopathic remedies to farm animals**

Veterinarians are allowed to prescribe homeopathic remedies, but it is not subject to veterinary prescription; a specific training in homeopathy is not required. Veterinarians, animal health professionals and owners (farmers) are allowed to administer them to farm animals.

**Documentation of treatments**

Records must be kept by the farmer.

**4.3.16 Legal situation in Spain**

It is permitted to use veterinary homeopathic remedies for farm animals. In Spain, the Law on guarantees and rational use of medicines and health products (*LEY 29/2006*) regulates the details related to homeopathic medicines for human and veterinary use. The law is an implementation of European regulations. Currently, Spain is expecting the ministerial order to develop the law, to register homeopathic drugs.

The method of preparation of homeopathic medicines for human and veterinary use is the same and collected in the pharmacopoeia. In Spain, the European Pharmacopoeia, comprising the French and German Homeopathic Pharmacopoeia is used.

**Approval of homeopathic remedies for farm animals**

Homeopathic remedies have to be made by an authorized pharmacy or laboratory. It is also permitted to use human homeopathic remedies. There are one classic (*Lycopodium*) and 12 homeopathic combinations registered for animals by the company Heel®. A new law on homeopathic medicines is in preparation.

**Prescription and administration of homeopathic remedies to farm animals**

Veterinarians are allowed to prescribe homeopathic remedies and veterinarians and farmers are allowed to administer them to farm animals. A graduation as veterinary surgeon and courses at universities and homeopathic associations are required to prescribe homeopathic remedies.

**Documentation of treatments**

Records must be kept by the farmer. These are controlled by their responsible veterinarian, and also by organic societies on organic farms.

**In a nutshell**

Homeopathy is not restricted by strict laws and remedies are easily available. However, its use in farm animals is not widely deployed in Spain.

### 4.3.17 Legal situation in Sweden

It is permitted to use veterinary and human homeopathic remedies above D4 which are registered in Sweden.

#### ***Approval of homeopathic remedies for farm animals:***

There are no veterinary homeopathic remedies registered, but homeopathic remedies are allowed for humans and animals as well. 445 human remedies and 632 homeopathic combinations are registered. There are 16 veterinary homeopathic combinations registered.

#### ***Prescription and administration of homeopathic remedies to farm animals:***

Veterinarians are NOT allowed to prescribe homeopathic remedies, but homeopaths (naturopaths) and owners (farmers) are allowed to buy and administer them to farm animals. Veterinarians must work in accordance with 'science and approved experience', which is not clearly defined, and a highly controversial topic. Naturopaths must have a homeopathic training in Sweden, but they are only permitted to prescribe for an animal after the diagnosis of a veterinarian- which makes it quite tedious, time consuming and expensive.

#### ***Documentation of treatments***

Records of homeopathic treatments must be kept by the farmer; they are controlled in any case at organic farms.

#### ***In a nutshell***

The most striking point in Swedish law is that it is forbidden for veterinarians to prescribe homeopathic remedies, while a diagnosis by them is required, when naturopaths prescribe homeopathic remedies to farm animals. The EU guidelines about registration of homeopathic remedies are followed.

### 4.3.18 Legal situation in Switzerland

It is permitted to use veterinary and human homeopathic remedies which are registered in Switzerland. With special permission from the authorities (Swissmedic), they can be imported.

#### ***Approval of homeopathic remedies for farm animals:***

Homeopathic remedies lower than D6 have a withdrawal period. There is no need to register a homeopathic remedy if less than 100 packages are sold in a year. A simplified registration is possible for veterinary homeopathic remedies:

1. With a proved efficacy in the EU or EFTA (European Free Trade Association).
2. Which are already allowed in the cantons for a minimum of 15 years
3. For which the active ingredients in the mentioned indication and pharmaceutical form are allowed in at least 5 countries of the EU or EFTA for at least 10 years

Nosodes are difficult to obtain because pharmacies from abroad are not allowed to import them to Switzerland.

#### ***Prescription and administration of homeopathic remedies to farm animals***

Anyone is allowed to prescribe homeopathic remedies for farm animals and to administer them to farm animals. Owners (farmers) are always allowed to use them for their own animals.

#### ***Documentation of treatments***

Records should be kept by the farmer. These are not generally controlled by the government because their focus is on medicines with a withdrawal period.



***In a nutshell***

It is possible to use homeopathic remedies for farm animals without relevant restrictions.

**4.3.19 Legal situation in the United Kingdom**

It is permitted to use veterinary homeopathic remedies which are registered in the United Kingdom or in the EU. Human homeopathic remedies (registered or not) are allowed, too. Article 16 of the Directive 2001/82/EC is recognized by the Veterinary Medicines Directorate (VMD). Therefore it is permitted to prescribe all homeopathic remedies. Homeopathic remedies which are made by an authorized pharmacy are also allowed.

***Approval of homeopathic remedies for farm animals:***

The VMD allows homeopathic remedies to be placed on the market, provided one of the following criteria is met:

1. The remedy, as manufactured by a specified manufacturer, is registered with VMD through the registration scheme.
2. The remedy may have “grandfather rights” and have been included in the list of such remedies as manufactured by a specified manufacturer.
3. The remedy may be prepared extemporaneously and supplied directly to the end user by a pharmacist in a registered pharmacy in accordance with a homeopathic manufacturing procedure described in an official European Pharmacopoeia (Ph.Eur.).
4. The remedy may be prescribed by a veterinary surgeon, either one already registered or authorized for human use, or having been prepared extemporaneously in accordance with the provisions of the cascade.

At present remedies classified as sarcodes (homeopathic remedies prepared from healthy animal tissues and secretions) or nosodes (homeopathic remedies prepared from microbe cultures, from viruses, fungi, pathological secretions and excretions) are not considered to fall within any of the above categories.

While 7 homeopathic remedies and one homeopathic combination are registered for animals, no remedy is specified for the use in farm animals. Other remedies may be prepared and supplied under 'special' regulations. Around 45 remedies are registered for humans; all other remedies may be prepared and supplied under 'special' regulations.

***Prescription and administration of homeopathic remedies to farm animals***

Veterinarians and owners (farmers) are allowed to prescribe homeopathic remedies and to administer them to farm animals. According to the Royal College of Veterinary Surgeons (RCVS), a veterinary surgeon has to be ‘adequately trained’ in veterinary homeopathy. The Faculty of Homeopathy (London) accredits courses in veterinary homeopathy but is not formally recognised by RCVS. At present there is only one such course in operation in UK, a 3 year postgraduate course at the Portland Centre for Integrated Medicine, Bristol. There is no definition of what ‘adequately trained’ means but it is not confined to accredited qualifications given by the Faculty of Homeopathy. For farmers, education courses on homeopathy in farm animals are offered but not mandatory.

***Documentation of treatments***

Records must be kept by the veterinarian as well as by the farmer. These are controlled by the Government's Department of Environment, Food and Rural Affairs (Defra).

#### 4.4 Overview on legal situation in 21 countries

Homeopathy can be used for treating food-producing animals in all European countries, where a feedback was available (Table 1). In these countries, it is allowed to prescribe and administer homeopathy by veterinarians, except for Sweden, and by farmers, except for Estonia, Latvia and Lithuania. The obligation to keep records and the control of these records is dealt with quite differently. The same is true for the specific regulations concerning homeopathic remedies and the educational requirements.

Table 1: Legal situation in 21 European countries

	Homeopathy prescription and administration				Record keeping		Homeopathic remedy regulations						Educational requirement	
	Allowed for food-producing animals	Veterinarian is allowed to prescribe	Veterinarian is allowed to administer	Farmer is allowed to administer	Obligation to keep records	Control of these records	All homeopathic remedies	Veterinary homeopathic remedies for farm animals	Registered veterinary homeopathic remedies	Vet. homeopathic remedies, registered for farm animals	Human homeopathic remedies	Registered human homeopathic remedies	Veterinary university	Homeopathic training
<b>Austria</b>	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	No
<b>Belgium</b>	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
<b>Bulgaria</b>	Yes	Yes	Yes						Yes					
<b>Croatia</b>	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	No	No
<b>Denmark</b>	Yes	Yes	Yes	Yes	No	No	No	No	Yes	Yes	No	No	Yes	No
<b>Estonia</b>	Yes	Yes	Yes	No	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
<b>Finland</b>	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
<b>France</b>	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes	Yes	No
<b>Germany</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
<b>Greece</b>	Yes	Yes	Yes											
<b>Hungary</b>	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes	No	No	Yes	No
<b>Italy</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>Latvia</b>	Yes	Yes	Yes	No	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
<b>Lithuania</b>	Yes	Yes	Yes	No	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
<b>Luxembourg</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
<b>The Netherlands</b>	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes	No	No	Yes	No
<b>Portugal</b>	Yes	Yes	Yes		Yes	Yes	No	Yes	Yes	Yes	No	Yes	Yes	No
<b>Spain</b>	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No	No	No	Yes	Yes
<b>Sweden</b>	Yes	No	No	Yes	Yes	Yes	No	No	Yes	No	No	Yes	Yes	Yes
<b>Switzerland</b>	Yes	Yes	Yes	Yes	Yes		No	No	Yes	No	No	No	Yes	No
<b>United Kingdom</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Open fields in the Table are displayed when questions were not answered

## 5 Factual state of the use of homeopathy on farm animals in different European countries

### 5.1 Survey group

In total, a number of 100 participants took part in the survey on the factual state of the use of homeopathy. The number per country varied from 1 (Hungary, Latvia, Portugal, and Sweden) to 25 participants (Spain) (Table 2). Due to the heterogeneous distribution of the respondents, the results cannot claim to be representative. When considering the results of the survey, it has also to be taken into account that they were gained only from veterinarians prescribing and using homeopathy. Thus, a bias of the survey group cannot be excluded. On the other hand, the members of the survey group were the only information source that was available to receive at least some insight knowledge in the use of homeopathy from the perspective of veterinarians in the various European countries.

Table 2: Origin and number of participants

	Austria	Belgium	Denmark	France	Germany	Hungary	Ireland	Italy	Latvia	Portugal	Spain	Sweden	Switzerland	The Netherlands	United Kingdom
n=	23	2	2	4	16	1	2	5	1	1	25	1	8	4	5

The information on the factual conditions on the use of homeopathy in food-producing animals originated from a group of veterinarians dealing with homeopathic products, and who lived and worked in 15 European countries. Most of them had been working as a veterinarian for many years and could look back on a long experience of the prescription of homeopathic remedies (Figure 1).

When did you start working as a veterinarian? When did you start working with homeopathic treatments?

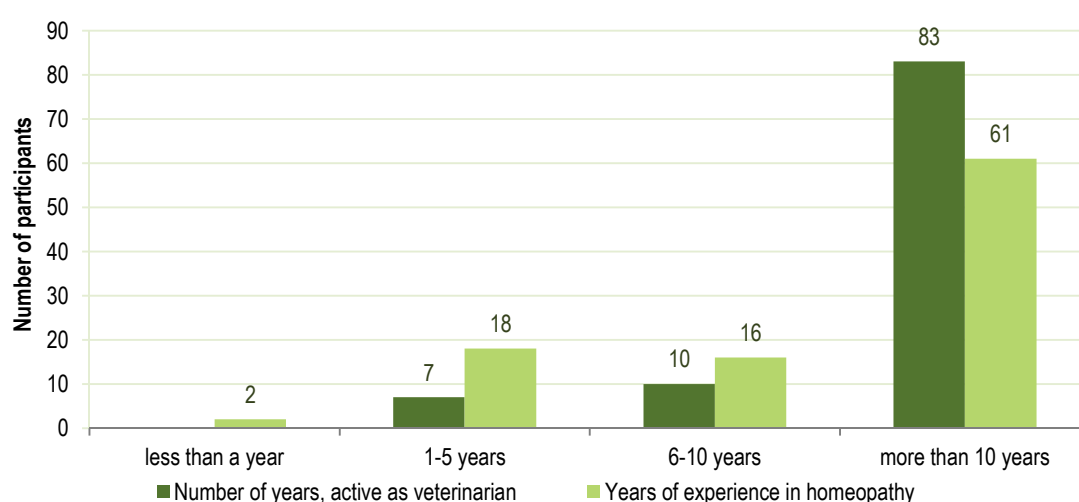
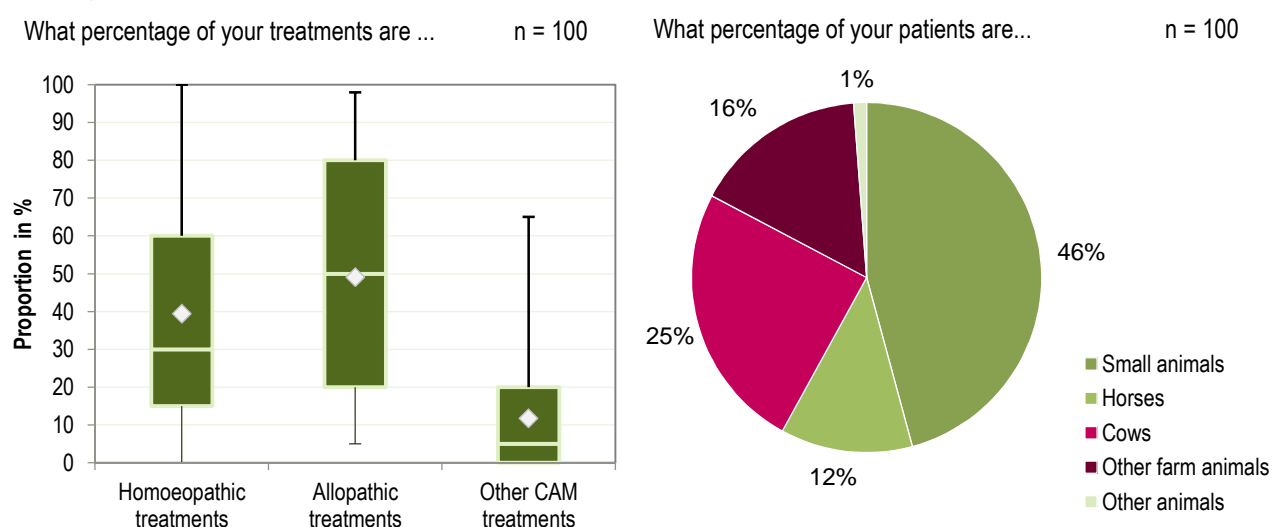


Figure 1: Experience as veterinarian and in the field of homeopathy

The group of veterinarians participating in the survey used homeopathy to a varying extent (Figure 2). Half of the respondents rated that they use homeopathy in more than 30% of their treatments. Other types of complementary and alternative medicine (CAM) were used less.

In their veterinary practices small animals and horses represent the major share of the patients. Farm animals have an average share of about 41%. Some veterinarians (25 %), however, don't treat farm animals at all; 39% had either no cows or no other farm animals in their clientele (data not shown).



**Figure 2: Share of treatments and proportion of patients**

To evaluate the factual state of homeopathic treatments in European countries, the survey assessed on the one hand the use of homeopathy by the participants and on the other, asked for an assessment on the national situation regarding the dissemination and use of homeopathy for farm animals. Therefore, the selection of participants did not represent all veterinarians but focussed on those who had experience in using homeopathy in their veterinary practice. The information from the survey group represents a sample with sound expertise in the field of veterinary homeopathy.

## 5.2 Homeopathic treatments of farm animals in the survey group

Within the group of veterinarians responding to the survey, about 30 % of treatments of farm animals were homeopathic treatments (Table 3). The average of 30% is due to some veterinarians who gave a quite high estimation on the share of homeopathic treatments (up to 100%). However, half of the respondents (median) gave the estimation that they use homeopathic treatment in farm animals in less than 19 % of the cases. Looking at specific disorders, homeopathic treatments were more often used to improve the animals' general condition, followed by the treatment of metabolic disorders and 'after calving' treatments.

**Table 3: Share of homeopathic treatments in farm animals and specific situations**

Share of homeopathic treatments (%)	n =	Mean	Min.	1 <sup>st</sup> quartile	Median	3 <sup>rd</sup> quartile	Max.
...in farm animals	98	30	0	9	19	50	100
...to improve the general condition	94	34	0	4	20	50	100
...of metabolic disorders	96	30	0	1	20	43	100
...after calving	94	30	0	0	8	58	100
...of mastitis	97	26	0	0	10	40	100
...of lameness	97	26	0	5	10	40	100
...of metritis	96	26	0	0	5	40	100

Questions: Please give the percentage of homeopathic treatments versus all treatments in farm animals in your surgery.  
What are the diseases you treat with homeopathic remedies and in which percentage?

Among the participants in this survey, there was a high overall readiness for documentation (73 %). Computer stored clinical notes were used quite frequently by 42 % of the participants (Table 4). As the question didn't specify the objective of documentation it will probably include the documentation for accounting. The majority of participants indicated that they evaluate the treatment success.

**Table 4: Documentation of homeopathic treatments**

N = 100	Yes	No	No answer	Computer stored notes	Index card	Stable book	Other
				Multiple answers possible			
<b>Documentation of homeopathic treatments</b>	73	13	14	42	31	28	11
<b>Evaluation of homeopathic treatments</b>	76	6	18				

Do you document the homeopathic treatments?      How do you document the homeopathic treatments (multiple answers)?  
Is there an evaluation of the treatment?

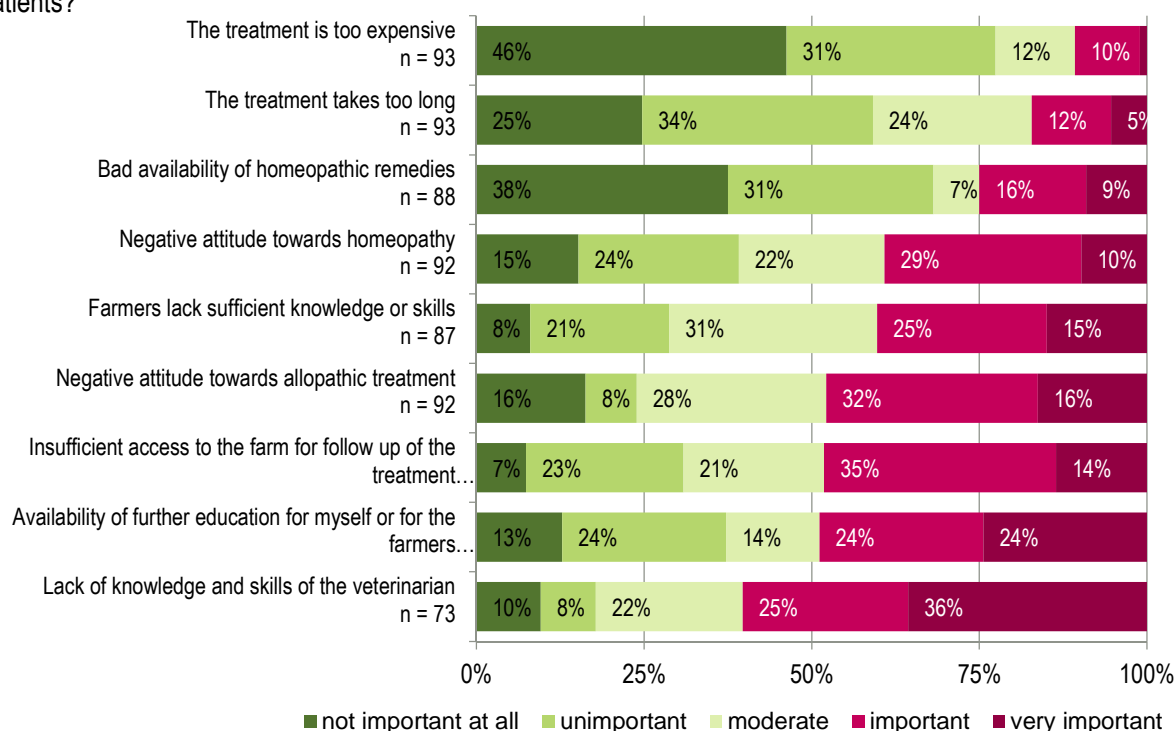
### 5.3 Decision making in favour or against homeopathic treatment

The participants were asked to assess the importance of some reasons for their decision on whether to use homeopathy (Figure 3). The least important arguments for decision making were the price of treatment, the duration for treatment and the availability of remedies. The latter could depend on country specific regulations. The availability of homeopathic remedies was assessed as important or very important from participants in Spain (n = 10), Germany (n = 3), Italy (n = 2), France (n = 2), Austria, Denmark, Ireland, Switzerland, and The Netherlands (n = 1 each).

For nearly half of the participants the *availability of further education for the veterinarian or the farmer* was a main reason for their decision making in favour or against the use of homeopathy. Even more of them (61%) rated *the lack of knowledge and skills of the veterinarian* as important or very important. The latter aspect seems contradictory to the level of experience in the group of respondents. However, about 27 % of the participants gave no assessment for this statement and it can be assumed that the level of expertise caused a bias in these answers.



How important are the following considerations for your decision in favour or against the use of homeopathy for your patients?



**Figure 3: Importance of considerations affecting decision making regarding the use or not of homeopathic treatment**

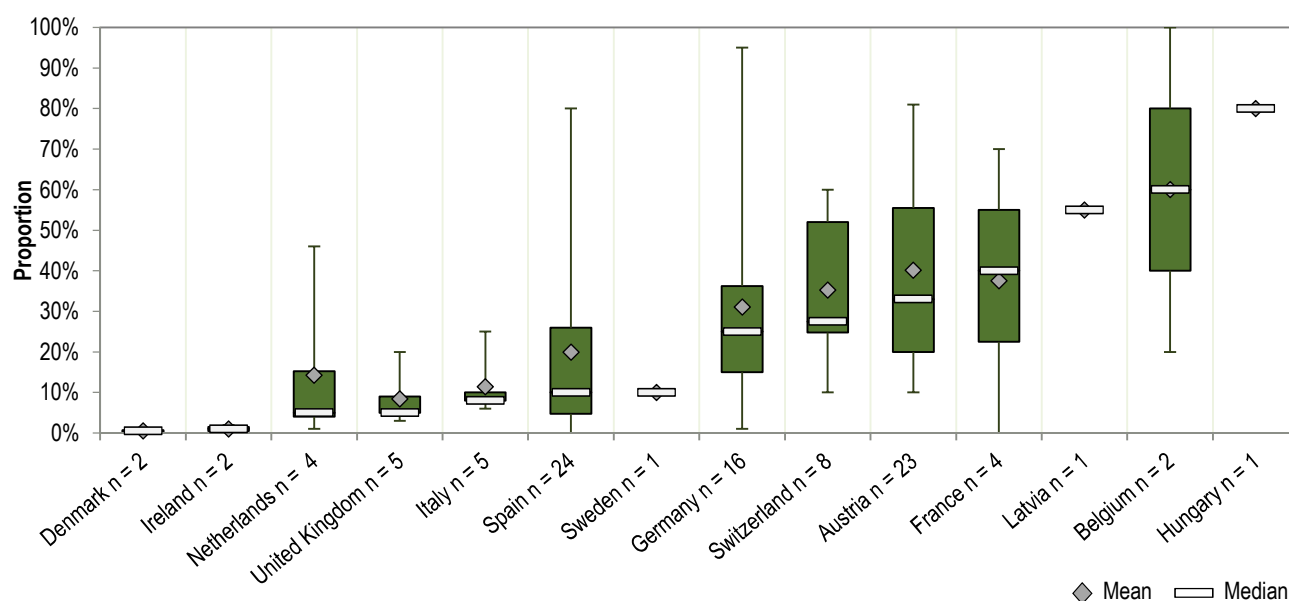
## 5.4 Use of homeopathy on farm animals in different European countries

To assess the use of homeopathy on farm animals in European countries, three questions were asked regarding different perspectives on the matter. The participants were asked (i) to assess the proportion of farmers in the surrounding of their practise using homeopathy, (ii) to estimate the use of homeopathic treatments in relation to all treatments in farm animals in their country, and (iii) the percentage of veterinarians in their country who used homeopathic remedies on farm animals.

In Figure 4 the assessment of the local situation on the use of homeopathy by is represented on a country basis. The estimations varied considerably within and between the countries. Therefore, the interpretations refer to the median value rather than the average. There are roughly three situations: in Denmark and Ireland the participants estimated the proportion of farmers in the surrounding of the veterinarian using homeopathy to be 1%. In The Netherlands, the United Kingdom, Italy, Spain and Sweden the estimations varied from 5% to 10%. In a third group of countries, including Germany, Switzerland, Austria, France, Latvia, Belgium and Hungary, the regional share of farmers using homeopathy was assessed between 25% and 80%.

The presented results might not represent the overall situation in the countries due to the fact that the specialisation of the veterinarian in the use of homeopathy in farm animals is expected to affect the use of homeopathy in farm animals in his region.

Please give an estimation of the percentage of farmers in the surrounding of your surgery that are using homeopathic remedies in farm animals



**Figure 4: The proportion of farmers using homeopathy**

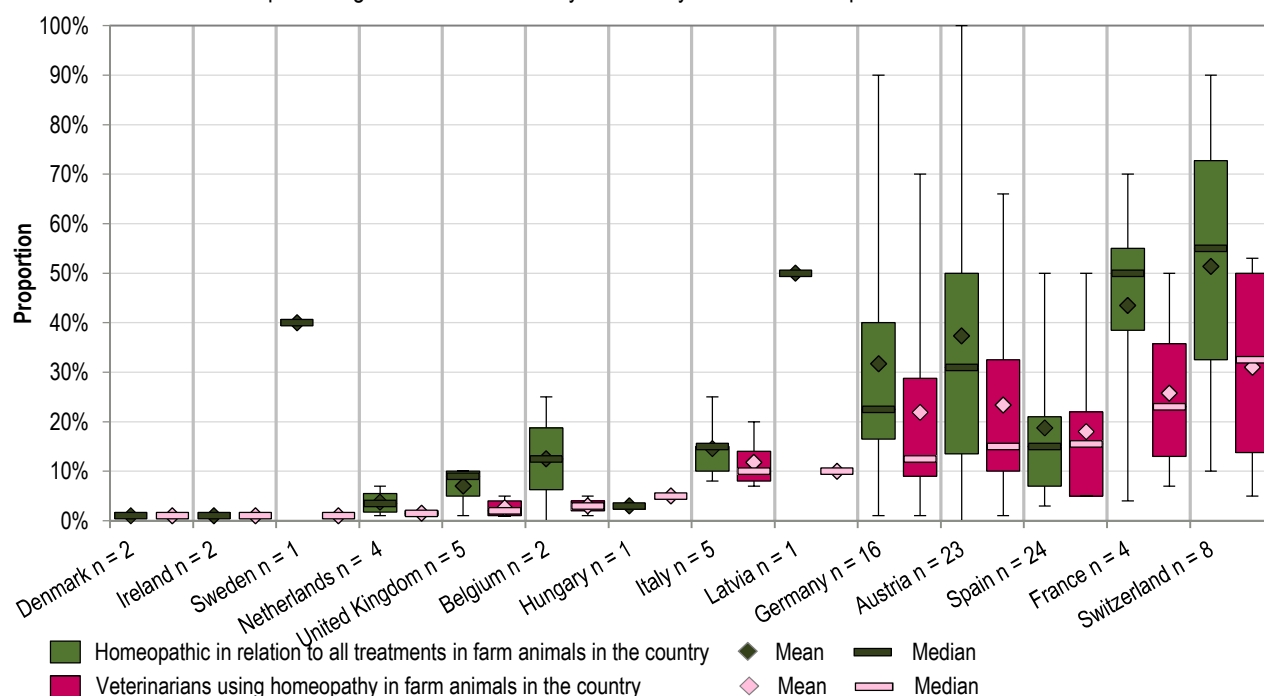
A more general view on the country specific situation regarding the use of homeopathy on farm animals was assessed by two questions at different places on the questionnaire, thereby minimizing mutual effects. One asked for the share of homeopathic treatments in relation to all treatments on farm animals in the country, which would include non-veterinary treatments. The other question was aimed at the number of veterinarians in the country who use homeopathic remedies on farm animals. Like the assessments on farmers in the region using homeopathy, the estimations varied considerably within and between countries (Figure 5).

In most countries, the use of homeopathy on farm animals was estimated higher than the proportion of veterinarians using homeopathy for farm animals. According to this assessment (which was based on only a few answers), a very limited number of veterinarians in Denmark, Ireland, and Sweden, are using homeopathy for farm animals. From these countries no estimation was more than 1%. In The Netherlands, United Kingdom, Belgium, and Hungary the share was up to 5%, and for Italy and Latvia the estimation was 10%. For Germany, Austria, Spain, France, and Switzerland the proportion of veterinarians using homeopathy was assessed at between 13% and 33%.

Looking at the share of homeopathic treatments in relation to all treatments of farm animals, a pattern comparable to the assessment of the use of homeopathy by farmers in the region (Figure 4) can be found: for The Netherlands, the United Kingdom, Italy, Spain and Sweden the level is higher than for Denmark and Ireland but below Germany, Austria, France and Switzerland.

Combining the results shown in Figure 4 and Figure 5, three groups were identified: In Denmark and Ireland, homeopathy is hardly used in farm animals, neither by veterinarians nor by others. In The Netherlands, the United Kingdom, Belgium, Italy, Hungary, Spain, Sweden and Latvia there are some veterinarians using homeopathy in farm animals. Homeopathy is expected to have some share in treatments of farm animals. A third group includes Germany, Austria, France and Switzerland, with more veterinarians using homeopathy and a higher share of treatments.

Give an estimation of the percentage of use of homeopathic treatments in relation to all treatments in farm animals in your country  
Give an estimation of the percentage of veterinarians in your country who use homeopathic remedies in farm animals

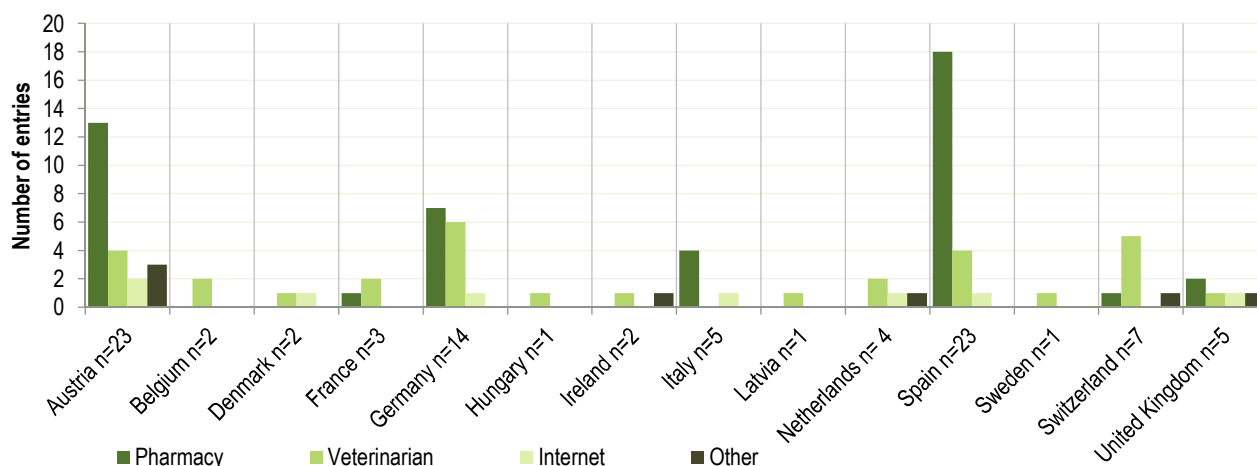


**Figure 5: Use of homeopathy by veterinarians and share of treatments on farm animals by country**

According to the IAVH, there are a comparably large number of homeopathic veterinarians in Austria, Germany, France, and Switzerland, causing the high number of homeopathic treatments.

The use of homeopathy by farmers leads to questions regarding the expertise, the origin of remedies, touching different aspects like treatment success, control, advice, and availability as well as the appropriate storage of remedies. Half of the participants (50 %) value the pharmacy as the most frequently used source for homeopathic remedies for farmers. About a third (37 %) gave the veterinarian and 9 % the internet as the main source of supply. Figure 6 displays the answers on a country basis. In countries with the most participants in this survey (Spain, Austria and Germany), pharmacies play a major role in the distribution of homeopathy remedies. In the other countries (except in Italy), most remedies are sold by the veterinarian.

Which is the most frequent used source where farmers in the region buy homeopathic remedies for their animals?



**Figure 6: Source of homeopathic remedies**

## 5.5 Obstacles for the extension of homeopathic treatments on farm animals

The characterisation of the factual situation regarding the use of homeopathy in farm animals was completed by an assessment of the availability of education courses in homeopathy for veterinarians and on obstacles for homeopathic treatments. Answers to these questions were evaluated for the three groups of countries with different levels of use of homeopathy in farm animals identified above. In countries where homeopathy is more commonly used, the ratings of the possibilities for education are better than in countries where homeopathy is only scarcely used (Figure 7). This is not surprising and reflects the legal situation and demands in the country. At the same time, appropriate training is an essential condition for adequate and effective use of homeopathy.

In Denmark and Ireland where homeopathy is scarcely used on farm animals, legal restrictions and a lack of demand from farmers were seen as the main obstacles for future increase in homeopathic treatments in farm animals (Figure 8). In the other countries, shortcomings in the professional training and individual qualification of veterinarians were selected as the most important topics. In the medium group with some use of homeopathy, the lack of demand by farmers will impede further development. Surprisingly, the lack of effectiveness of homeopathic remedies was only seldom seen as a hindrance by the survey participants. However, the more intense the use of homeopathy in the groups, the higher the share of this item in the answers given.

What do you think of the possibilities for education and continuing education for homeopathic veterinarians in your country?

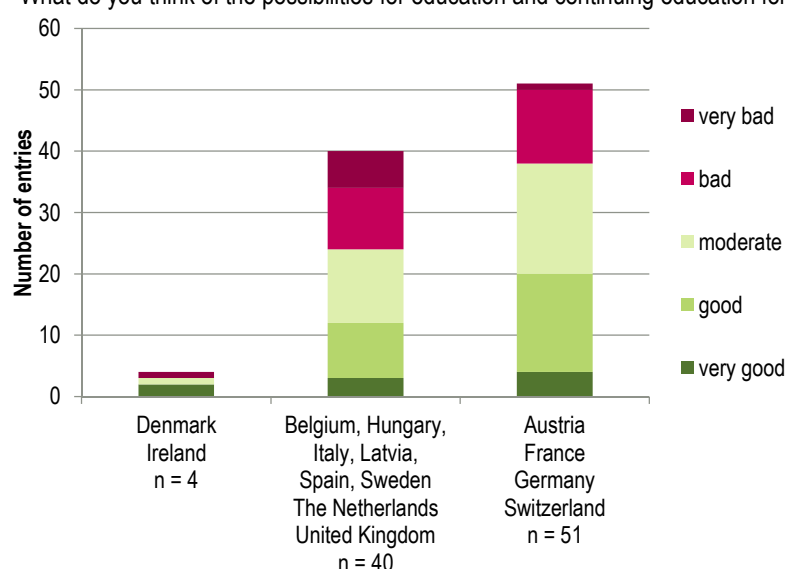


Figure 7: Training and further education in homeopathy

Which are from your point of view the prior obstacles for the further extension of homeopathic treatment in farm animals?  
(multiple answers)

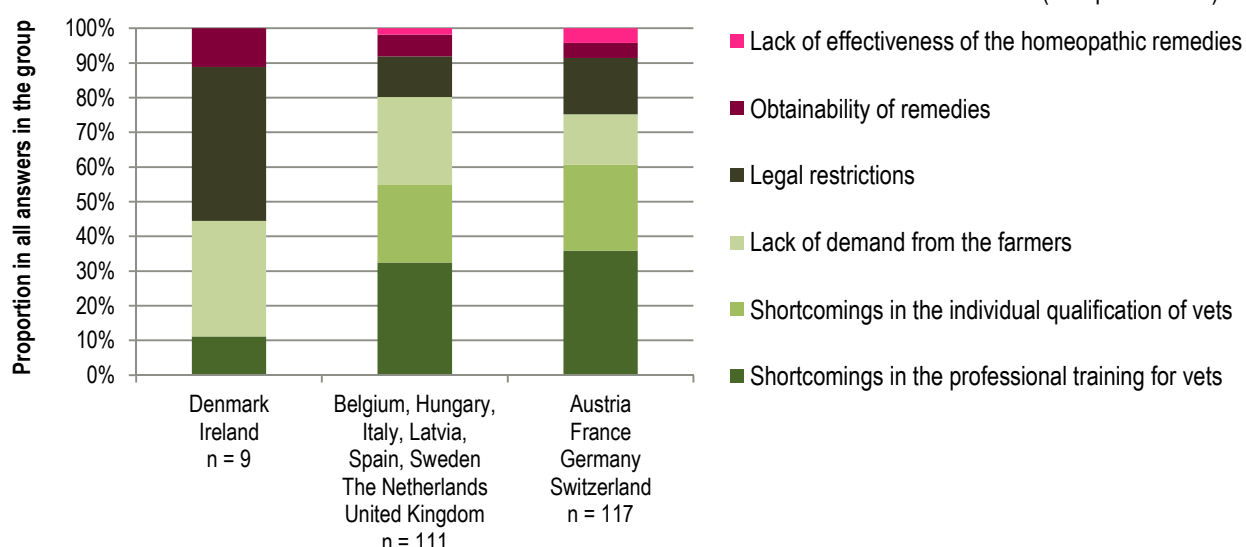


Figure 8: Obstacles for further expansion of homeopathic treatments in farm animals

## 5.6 What kind of rules on the European level could be helpful in improving the situation?

Most often the participants recommended the inclusion of homeopathic education in the university training of veterinarians ( $n = 15$ ). This could include a specialisation for different farm animal species. Regarding the legislation and rules, most often the recognition of homeopathy was called for ( $n = 7$ ). This would include the need for documentation as with allopathic drugs. Furthermore, the prioritisation of homeopathic treatments before allopathic treatments was suggested. For organic farms the already existing regulation should be reviewed. Furthermore, the standardisation of legislation regarding the registration of remedies on a European level was mentioned several times as an essential condition to increase the use of homeopathy.

## 6 Conclusions

The legal conditions regarding approval, prescription, and administration of homeopathic remedies to farm animals as well as the documentation of the use of homeopathy varies considerably between European countries. Due to the procedure of asking single contact persons in the different European countries by the IAVH, a validation of the statements concerning the legal conditions was not possible. Despite some uncertainties regarding the precise wording of the official legal conditions and their translation into the English language, the overall results emphasise the need to harmonise rules within the EU. On the other hand, the EU-Guidelines on veterinary medical products are not well adapted to the peculiarities of homeopathic veterinary products. In order to reflect the specific nature of homeopathic remedies and to preserve veterinary homeopathic remedies for food-producing animals, separate rules for these remedies should be considered.

The ongoing 'Revision of the legal framework for veterinary medicinal products' (COM 2011) aims to "increase the availability of veterinary medicinal products, to reduce the administrative burden on enterprises, to improve the functioning of the internal market for veterinary medicinal products and to assess the possibilities for an improved response to antimicrobial resistance related to the use of veterinary medicines". However, it should be recognised that the approval of remedies is only one aspect of the whole issue of treatment. The use of homeopathic remedies follows two popular



societal aims to avoid pharmaceutical residues in organic products and to ensure a high level of animal health and welfare, as stipulated by organic principles. The issues of animal health and welfare as well as food safety are closely related to the question of whether the legal conditions and factual findings are sufficient to ensure a high effectiveness in the treatment of diseased food-producing farm animals.

The current public debate on the negative side effects of the use of antibiotics with particular focus on antibiotic resistance is expected to increase the use of alternative treatment such as homeopathy in farm practice; particularly in organic livestock production. According the EC-Regulation (No 834/2007) on organic agriculture, animals *shall be treated immediately* if they become sick or injured. Alternative remedies *shall be used in preference to chemically-synthesized allopathic veterinary treatment or antibiotics, provided that their therapeutic effect is effective for the species of animal, and the condition for which the treatment is intended*. However, neither an immediate treatment nor the effectiveness of treatment, whether alternative or conventional, are ensured in farm practice. Therefore, an animal health inspection and monitoring procedure should be established which provides information on the effectiveness of treatment in farm practice to avoid prolonged suffering of diseased animals.

## 7 References

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## 8 Annex

### 8.1 Questionnaire on the legal situation

Please copy the exact legislative text and source.

1. Summarize the legislation of the preparation of veterinary homeopathic remedies, esp. for farm animals? (volume: 0,75 until 2 pages DIN A4)

We want to know: (Please give an answer even if this question or point is mentioned in the summary or not – it is necessary for the evaluation. Thank you):

1. Are homeopathic remedies allowed for farm animals? Can homeopathic remedies be used on farm animals?
2. Who is allowed to prescribe homeopathic remedies for farm animals?
3. Who is allowed to administer homeopathic remedies to farm animals?
4. Is there an obligation to keep records of homeopathic treatments of farm animals? If yes, by whom?
5. Is there control of these records?
6. Which homeopathic remedies can be used in farm animals
  - a. All homeopathic remedies
  - b. Veterinary homeopathic remedies
  - c. Veterinary homeopathic remedies which are registered worldwide/European union/ own country? (s delete what is not fitting)  
How many homeopathic remedies are officially registered for veterinary use? Are they unitary or complex remedies? Which remedies?
  - d. Veterinary homeopathic remedies which are registered for farm animals
  - e. Human homeopathic remedies
  - f. Human homeopathic remedies which are registered; how many homeopathic remedies are officially registered for human use? Are they unitary or complex remedies? Which remedies?
  - g. Homeopathic remedies which are made by an authorized (homeopathic) pharmacy
  - h. Other, namely: .....
7. What education is required for a homeopathy-prescribing person to be allowed to prescribe for farm animals?
  - a. Veterinary surgeon
  - b. Homeopathic education: where:
  - c. Other, namely: .....
8. What kind of rules on European level could be helpful to improve the situation (please mention practical steps if possible)
9. What actions can the IAVH take to improve the situation?

## 8.2 Summarized answers on the legal situation

**Are homeopathic remedies allowed for farm animals?**

	Frequency
Valid Yes	21

**Is the vet allowed to prescribe homeopathic remedies?**

	Frequency	Percent
Valid Yes	20	95,2
No	1	4,8
Total	21	100,0

**Are other people allowed to prescribe homeopathic remedies?**

	Frequency	Percent
Valid No	15	71,2
Owner/Farmer	4	19,2
Naturopath	2	9,6
Total	21	100,0

**Is the farmer allowed to administer homeopathic remedies?**

	Frequency	Percent
Valid Yes	15	71,4
No	3	14,3
Total	18	85,7
Missing Answers	3	14,3
Total	21	100,0

**Is there an obligation to keep records of homeopathic remedies?**

	Frequency	Percent
Valid Yes	13	61,9
No	6	28,6
Total	19	90,5
Missing Answers	2	9,5
Total	21	100,0

**Do you need a homeopathic education to be allowed to prescribe homeopathic remedies?**

	Frequency	Percent
Valid Yes	4	19,0
No	15	71,4
Total	19	90,5
Missing Answers	2	9,5
Total	21	100,0

### 8.3 Online questionnaire on factual conditions

**Questions about your actual situation**

**In which european country do you practise?**

Choose one of the following answers

☐ Belgium  
☐ Denmark  
☐ Germany  
☐ France  
☐ United Kingdom  
☐ Ireland  
☐ Italy  
☐ the Netherlands  
☐ Austria  
☐ Sweden  
☐ Switzerland  
☐ Spain  
☐ Hungary  
☐ Other:

**What percentage of your treatments are**  
Only numbers may be entered in these fields.

homeopathic treatments   
 allopathic treatments   
 other CAM treatment

**?** Summary of your answers should be 100%.

**What percentage of your patients are**  
Only numbers may be entered in these fields.

small animals   
 horses   
 cows   
 other farm animals   
 other animals

**?** Summary of your answers should be 100%.

**Questions about the actual situation**  
of the use of homeopathic remedies in farm animals in your country

Please give an estimation of the percentage of the use of homeopathic treatment in relation to all treatments in farm animals in your country?  
Please click and drag the slider handles to enter your answer.

50
100

**?** Please fill in the percentage between 0 % - 100 %.

**What are the diseases you treat with homeopathic remedies and in which percentage?**  
Only numbers may be entered in these fields.

Percentage of homeopathic treatment	
Mastitis	<input type="text"/>
Metritis	<input type="text"/>
Metabolic disorders	<input type="text"/>
Lameness	<input type="text"/>
improving general condition	<input type="text"/>
After calving	<input type="text"/>
Other	<input type="text"/>

**Which percentage of complex and single remedies do you use when you treat these diseases?**  
Only numbers may be entered in these fields.

	% complex remedies (clinical homeopathy)	% single/pure remedies (classical homeopathy)
Mastitis	<input type="text"/>	<input type="text"/>
Metritis	<input type="text"/>	<input type="text"/>
Metabolic disorders	<input type="text"/>	<input type="text"/>
Lameness	<input type="text"/>	<input type="text"/>
Increasing general condition	<input type="text"/>	<input type="text"/>
After calving	<input type="text"/>	<input type="text"/>
Other	<input type="text"/>	<input type="text"/>

**Do you document the homeopathic treatments?**

☐ Yes   ☐ No   ☒ No answer

**How do you document the homeopathic treatments?**  
Check any that apply

☐ stable book  
☐ computer stored clinical notes  
☐ index card  
☐ Other:

**Is there an evaluation of the treatment?**

☐ Yes   ☐ No   ☒ No answer

How important are the following considerations for your decision in favor or against the use of homeopathy in your patients?

	very important	important	moderate	unimportant	not important at all	No answer
Negative attitude of my clients/friends/neighbours towards homeopathic treatment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Negative attitude of clients/friends/neighbours towards allopathic treatment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Bad availability of homeopathic remedies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of knowledge and skills of the veterinarian	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Farmers lack sufficient knowledge or skills	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The treatment takes too long	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The treatment is too expensive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Insufficient access to the farm for follow up of the treatment and continue the treatment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Availability of further homeopathic education for myself or for the farmers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Which are from your point of view the prior obstacles for the further extension of homeopathic treatment in farm animals?  
Check any that apply

- ☐ Legal restrictions
- ☐ Shortcomings in the professional training for vets
- ☐ Shortcomings in the individual qualification of vets
- ☐ Lack of effectiveness of the homeopathic remedies in the mentioned production diseases
- ☐ Obtainability of remedies
- ☐ Lack of demand from the farmers

What do you think of the possibilities for education and continuing education for homeopathic veterinarians in your country?  
Choose one of the following answers

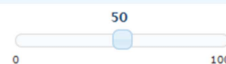
- ☐ very good
- ☐ good
- ☐ moderate
- ☐ bad
- ☐ very bad
- ☒ No answer

What kind of rules on European level could be helpful to improve the situation?  
(please mention practical steps if possible)

What actions can the IAVH take to improve the situation?

Please give an estimation of the percentage of the farmers in the surrounding of your surgery that are using homeopathic remedies in farm animals?

Please click and drag the slider handles to enter your answer.

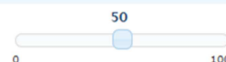


Please fill in the percentage between 0 % - 100 %.

Where can farmers in the surrounding of your surgery obtain (buy) homeopathic remedies for their animals? Which is the most frequently source?  
Choose one of the following answers

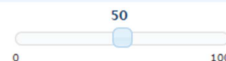
- ☐ Pharmacy
- ☐ Veterinarian
- ☐ Internet
- ☐ Other:
- ☐ No answer

Please give an estimation of the percentage of veterinarians in your country who use homeopathic remedies in the treatment of farm animals?  
Please click and drag the slider handles to enter your answer.



Please fill in the percentage between 0 % - 100 %.

Please give the percentage of homeopathic treatment versus all treatments in farm animals in your surgery?  
Please click and drag the slider handles to enter your answer.



Please fill in the percentage between 0 % - 100 %.

#### Personal data

ns will be handled anonymous of course. The answers can't be traced back to the participants  
personal data is important for the evaluation.

Year of birth

Only an integer value may be entered in this field.

Gender

- ☐ Female
- ☐ Male
- ☒ No answer

When did you start working as a veterinarian?  
Choose one of the following answers

- ☐ less than a year
- ☐ 1-5 years
- ☐ 6-10 years
- ☐ more than 10 years

When did you start working with homeopathic treatment?

When did you start working with homeopathic treatment?

Choose one of the following answers

- ☐ less than a year
- ☐ 1-5 years
- ☐ 6-10 years
- ☐ more than 10 years

Submit

Exit and



## 8.4 Registered homeopathic remedies in European countries

Country	How many unitary veterinary remedies are registered?	How many complex veterinary remedies are registered?	How many unitary human remedies are registered?	How many complex human remedies are registered?	How many complex veterinary remedies are in process of registration?
Austria	0	88 approved	3250	629 approved and 50 registered	
Belgium	0	5	>500	?	
Bulgaria	0	0	?	?	
Croatia	0	0	200	30	0
Denmark	0	0	40	65	
Estonia	0	0	0	14	0
Finland	0	0	521	0	
France	500	12	500	0	
Germany	34	129	>1300	Total human: 4764	40
Greece	0	0	?	?	
Hungary	0	13	245	55	
Italy	0	200		Total human: 159.566	
Latvia	0	1	0	84	90
Lithuania	0	7	0	83	0
Luxembourg	info not available	list is continually changing			
Netherlands	0	0	349	500	28
Portugal	0	0			
Spain	1	12			
Sweden	0	16	445	632	
Switzerland	>1000		>1000		
United Kingdom	7	1	>500		

## 8.5 Legislation in European Countries with reference to homeopathic treatments in farm animals

Country	
Austria	<ul style="list-style-type: none"> <li>Tierarzneimittelkontrollgesetz - TAKG StF: BGBl. I Nr. 28/2002</li> <li>Bundesgesetz vom 2. März 1983 über die Herstellung und das Inverkehrbringen von Arzneimitteln (Arzneimittelgesetz – AMG) StF: BGBl. Nr. 185/1983</li> <li>Verordnung des Bundesministers für Gesundheit über die Anwendung von Veterinär-Arzneispezialitäten unter Einbindung des Tierhalters (Veterinär-Arzneispezialitäten-Anwendungsverordnung 2010) StF: BGBl. II Nr. 259/2010</li> </ul>
Belgium	No answer
Bulgaria	No answer

	Croatia	<p>Legislation in Croatia considering the use of homeopathy (and the preparation of veterinary homeopathy remedies) either for humans or animals is poorly defined so we only have legally defined:</p> <ul style="list-style-type: none"> <li>Regulations on organic production of animal products (NN 13/01) this is the same law as EU 834/07</li> <li>Article 62. Conventional treatment should be limited to exceptional cases, and if is possible it should be performed by natural (phytotherapy and homeopathy), with the appropriate procedures and drugs</li> </ul>
	Denmark	<ul style="list-style-type: none"> <li>LBK nr.464 af 15/05/2014 - Chapter 3 -§8</li> </ul>
	Estonia	<ul style="list-style-type: none"> <li>Vastu võetud 29.03.2005 nr 52* Euroopa Parlamendi ja EL Nõukogu direktiiv 2001/82/EÜ veterinaarravimeid käsitlevate ühenduse eeskirjade kohta (EÜT L 311, 28.11.2001, lk 1–6); Euroopa Parlamendi ja EL Nõukogu direktiiv 2001/83/EÜ inimestervishoiu kasutatavate ravimite ühenduse eeskirjade kohta (EÜT L 311, 28.11.2001, lk 67–128); Euroopa Komisjoni direktiiv 2003/63/EÜ, millega muudetakse Euroopa Parlamendi ja EL Nõukogu direktiivi 2001/83/EÜ inimestervishoiu kasutatavate ravimite ühenduse eeskirjade kohta (EÜT L 159, 27.06.2003, lk 46–94).</li> </ul>
	Finnland	<ul style="list-style-type: none"> <li>Lääkkeiden käytöstä eläimille on säädetty eläinten lääkitsemisestä annetussa laissa (lääkitsemislaki; 387/2014)</li> <li>sekä MMM:n asetuksessa lääkkeiden käytöstä ja luovutuksesta eläinlääkinnässä (lääkitsemisasetus; MMMa 17/14)</li> <li>EU regulations 37/2010 concerning the mother tinctures of homeopathic remedies</li> </ul>
	France	No law on homeopathy remedies, but rules by the ANSES (Agence nationale de sécurité sanitaire de l'alimentation, de l'environnement et du travail
	Germany	<ul style="list-style-type: none"> <li>§ 56 a Arzneimittelgesetz (AMG)</li> <li>§ 12 a Verordnung über tierärztliche Hausapotheken (TÄHAV)</li> </ul>
	Greece	No answer
	Hungary	<ul style="list-style-type: none"> <li>128/2009 Verordnung von der Landwirtschaftsminister über Tierarzneimitteln <a href="http://net.jogtar.hu/jr/gen/hjegy_doc.cgi?docid=A0900128.FVM">http://net.jogtar.hu/jr/gen/hjegy_doc.cgi?docid=A0900128.FVM</a></li> <li>2012. évi CXXVII Gesetz über die Ungarische Tierärztekammer und Durchführung der Tierärztliche Dienstleistungen <a href="http://net.jogtar.hu/jr/gen/hjegy_doc.cgi?docid=A1200127.TV&amp;celpara=#xcelparam">http://net.jogtar.hu/jr/gen/hjegy_doc.cgi?docid=A1200127.TV&amp;celpara=#xcelparam</a></li> </ul>
	Italy	<ul style="list-style-type: none"> <li>Legislative Decree 193 of April 6, 2006</li> <li>Document 391R2092, 399R1804 Document, EC Regulation 2092/91, EC Regulation 1804/99, the EC Regulation 834/2007</li> </ul>
	Latvia	<ul style="list-style-type: none"> <li>Regulations Regarding the Labelling, Distribution and Control of Veterinary Medicinal Products, Republic of Latvia, Cabinet, Regulation No. 407, Adopted 19 June 2007</li> </ul>
	Lithuania	<ul style="list-style-type: none"> <li>VETERINARINIŲ VAISTŲ REGISTRAVIMO, GAMYBOS IR TIEKIMO LIETUVOS RESPUBLIKOS RINKAI REIKALAVIMAI (Veterinary drug registration)</li> <li>102. Maistiniams gyvūnams, nukrypstant nuo Reikalavimų 26-29 punktų nuostatų, privačiam veterinarijos gydytojui prisiimant atsakomybę, Lietuvos Respublikoje leidžiama naudoti homeopatinius veterinarinius vaistus, kurių veikliosios sudedamosios dalys įrašytos reglamento (EEB) Nr. 2377/90 II priede. (it is allowed to use homeopathic remedies for food animals in Lithuania when private veterinarian takes the responsibility)</li> <li>103.3. skiedimo laipsnis yra pakankamas, kad būtų garantuotas homeopatinio veterinarinio vaisto saugumas. Vaiste neturi būti daugiau nei 1/10 000 pradinės ("motininės") tinktūros dalies. (in homeopathic remedies should be not more than 1/10 000 part of mother tincture)</li> </ul>
	Luxembourg	<ul style="list-style-type: none"> <li>Modifications du règlement grand-ducal modifié du 15 janvier 1993 relatif à la mise sur le marché des médicaments vétérinaires</li> </ul>

	<ul style="list-style-type: none"> <li>• Art. 36. introduisant les articles 1-1 et 1-2 nouveaux</li> <li>• (Art. 1-2) 3. Les dispositions du paragraphe 1 sont applicables au traitement d'une espèce productrice de denrées alimentaires à condition que les substances pharmacologiquement actives des médicaments figurent à l'annexe I, II ou III du règlement (CEE) n°2377/9D et que le vétérinaire fixe un temps d'attente approprié.</li> </ul>
Netherlands	<ul style="list-style-type: none"> <li>• EU Guidelines</li> </ul>
Portugal	No answer
Spain	<ul style="list-style-type: none"> <li>• LEY 29/2006, de 26 de julio, de garantías y uso racional de los medicamentos y productos sanitarios: <a href="http://www.boe.es/boe/dias/2006/07/27/pdfs/A28122-28165.pdf">http://www.boe.es/boe/dias/2006/07/27/pdfs/A28122-28165.pdf</a></li> </ul>
Sweden	<ul style="list-style-type: none"> <li>• The Swedish medical products Agency's code of statutes ISSN 1101-5225 Publisher: Director General Gunnar</li> <li>• Alvan Regulations amending the Swedish medical products Agency's regulations and general advice (LVFS 1997:9) for the registration of some homeopathy medicinal products; decided on May 30, 2006</li> </ul>
Switzerland	<ul style="list-style-type: none"> <li>• Teilrevision Tierarzneimittelverordnung (TAMV) und Arzneimittel-Werbeverordnung (AWV)</li> </ul>
United Kingdom	<ul style="list-style-type: none"> <li>• Veterinary Medicines Regulations. 2013 <a href="http://www.vmd.defra.gov.uk/pdf/vmgn/VMGNNote07.pdf">http://www.vmd.defra.gov.uk/pdf/vmgn/VMGNNote07.pdf</a></li> </ul>