

28 May 2015

Medicines and Healthcare products Regulatory Agency  
151 Buckingham Palace Road  
London  
SW1W 9SZ

*and*

General Pharmaceutical Council  
25 Canada Square  
London  
E14 5LQ

*By email*

Dear Sir or Madam

Please find below a complaint about:

Nelsons Homeopathic Pharmacy  
87 Duke Street  
London  
W1K 5PQ

...and pages from their websites as indicated below.

I understand that these premises are a Registered Pharmacy, GPhC registration number 1106255 and that the Superintendent Pharmacist is Susanne Skovgaard Haar, GPhC registration number 2039122.

Co-Director, Maria MacLachlan and I visited Nelsons Homeopathic Pharmacy at the above address on 06 May 2015 and 12 May 2015. We were able to take some photographs of the homeopathic medicines available for sale to the general public, collect some leaflets and make a test purchase of a homeopathic medicine. Some of the photographs are, unfortunately, of poor quality, but we believe they are adequate to illustrate the very many issues we found.

I have divided the complaint into two main sections with sub sections covering individual issues (in no particular order):

1. Pharmacy premises
  - 1.1. Nelsons Homeopathic Pharmacy display
  - 1.2. Nelsons Homeopathic Pharmacy leaflets
  - 1.3. Nelsons homeopathy kits
    - 1.3.1. The Nelsons Travellers Companion
    - 1.3.2. The Nelsons Nursery Kit
    - 1.3.3. The Nelsons Detox Kit
    - 1.3.4. Basic 18 Kit

- 1.4. Display boxes
  - 1.5. Test purchase
  - 1.6. Dr Reckeweg
  - 1.7. Schuessler Tissue Salts
  - 1.8. Heel homeopathic medicines
    - 1.8.1. Oculoheel leaflet
  - 1.9. Other Mother Tinctures
  - 1.10. Nelsons Homeopathic Pharmacy 2015 Price List
2. Nelsons websites
- 2.1. Nelsons Klikpak range
  - 2.2. Arnica (NR)
  - 2.3. Aconite (HR)
  - 2.4. TISSUE SALTS (SCHUESSLER)
  - 2.5. ARNICARE ARNICA 30C CLIKPAK
  - 2.6. ARNICARE ARNICA 6C CLIKPAK
  - 2.7. CLIKPAK
- ACONITE 30C

I am sure you will be as concerned as we are at the apparent widespread breaches of the medicines regulations we uncovered. We were unprepared for and were shocked by what we found: the breadth and extent of the breaches indicate to us a total and complete disregard for the regulations and a blatant and cavalier attitude to public safety — one that can only bring regulation of medicines and Pharmacists into disrepute.

I would strongly urge you to make a joint unannounced visit to the premises so you can confirm what we found and see for yourselves the full extent of the issues.

Please note that we have been working with the Good Thinking Society and Bindmans LLP and are aware of their correspondence with the MHRA over a number of issues. We are aware of the letter from Bindmans to Mark Wilson of DH Legal Services dated 24 April 2015 that contained details of test purchases made by their client of the following unlicensed medicines:

- (a) Supplier: Homeopathy Express: Dr Reckeweg Diabetes Tissue Salt;
- (b) Supplier: HealthStuff: Heel Euphorbium;
- (c) Supplier: Nutricentre: Schuessler Tissue Salts Kali Mur;
- (d) Supplier: Helios: X-Ray;
- (e) Supplier: Nelsons: Sunlight;
- (f) Supplier: Freemans: Horned Owl

The Nelsons 'Sunlight' homeopathic medicine was purchased over the Internet from Nelsons Homeopathic Pharmacy.

I understand that homeopathic medicines that are not authorised under the NR scheme, not registered under the HR scheme and have not been granted a PLR are unlicensed homeopathic medicines. I further understand that unlicensed homeopathic medicines should not be advertised to the general public and that they should not be supplied or sold to a member of the public except under certain specific conditions. I understand these conditions involve a

Registered Pharmacist, but, given our experience of purchasing an unlicensed medicine (see below), I do not believe these conditions are being met either on the premises or via their website, phone or email.

Please therefore accept this letter as a formal complaint against Nelsons Homeopathic Pharmacy and Susanne Skovgaard Haar as the Superintendent Pharmacist as identified above.

Please keep me informed of your progress in dealing with this matter and of the outcome of your investigation, quoting our reference MHRA-GPHC-2015-05-Nelsons, followed by the section number as above where appropriate, in all correspondence.

I can provide you with the original leaflet, price list and the test purchase product if required.

Wherever possible, please reply by email to the email address given above.

Please acknowledge receipt by return and if you require any further information, please do not hesitate to contact me.

Yours



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Alan Henness

*Director*

## 1. Pharmacy premises

### 1.1. Nelsons Homeopathic Pharmacy display

The pharmacy had a display stand of their HR and NR homeopathic medicines. Integral to this stand was a spiral-bound booklet titled *Which remedy do I need* that gives indications for the homeopathic medicines on display. The shelves of the display had edge labels that said 'First aid', 'Aches & pains', 'Women's Health', 'Colds & Infections', 'Digestive' and 'Skin'.



This is the same booklet and labels that were the subject of previous complaints by ourselves to the MHRA and actions by them in relation to point of sale (PoS) advertising in Holland & Barrett stores as announced in their advertising investigation notices:

Advertising Complaint: Homeopathic Products in Holland and Barrett Stores - November 2011

(<http://www.mhra.gov.uk/Howweregulate/Medicines/Advertisingofmedicines/Advertisinginvestigations/CON140839>)

Advertising Homeopathic Products in Holland and Barrett Stores, July 2012

(<http://www.mhra.gov.uk/Howweregulate/Medicines/Advertisingofmedicines/Advertisinginvestigations/CON195940>)

Advertising Homeopathic Products in Holland and Barrett Stores, October 2012

(<http://www.mhra.gov.uk/Howweregulate/Medicines/Advertisingofmedicines/Advertisinginvestigations/CON239457>)

I believe the MHRA had also contacted Nelsons at that time about this matter and note that this was some three years ago.

I am therefore disappointed that Nelsons appear not to have taken their responsibilities seriously by permitting this PoS material in their own store and urge you to investigate this serious matter and ensure that there are no further breaches in any of retail outlet that sells their products.

## 1.2. Nelsons Homeopathic Pharmacy leaflets

The pharmacy had several free PoS advertising leaflets available. One was titled: *Homeopathy. Designed to help your natural healing process.* I have included a scan of the leaflet.

This leaflet gives general information about homeopathy. Although frequently erroneous and misleading in the general information it gives, I understand that such general information is sometimes permitted as point of sale advertising material.

However, the leaflet lists a number of homeopathic medicines that are manufactured and sold by Nelsons:

Aconite 30c, Apis Mel 30c, Arnica 30c, Arnica 6c, Arsen Alb 30c, Belladonna 30c, Bryonia 30c, Calc Carb 30c, Euphrasia 30c, Gelsemium 30c, Hypericum 30c, Ignatia 30c, Kali Bich 30c, Kali Phos 30c, Lycopodium 30c, Nat Mur 30c, Nux Vom 30c, Nux Vom 6c, Pulsatilla 30c, Rhus Tox 30c, Rhus Tox 6c, Sepia 30c, Sulphur 30c, Thuja 30c.

All these HR registered homeopathic medicines are available for sale by Nelsons in their pharmacy (see above) and online.

These Nelsons homeopathic medicines are listed under the headings: Aches and Pains, First Aid, Women's Health, Colds and Flu, Digestion and Skin. Additionally, the two pages titled A-Z Listing gives some 101 symptoms identified with the name of the homeopathic medicines.

Particularly in the context of the leaflet being available in a registered pharmacy and, in this case, in Nelsons' flagship store that sells, predominantly, their own brand of homeopathic medicines, I believe this leaflet will be seen by a member of the public as advertising for Nelsons own homeopathic medicines that have identical names as those advertised in the leaflet.

I therefore ask that you consider this leaflet as being advertising material, which contains indications for homeopathic medicines that are registered without indications.

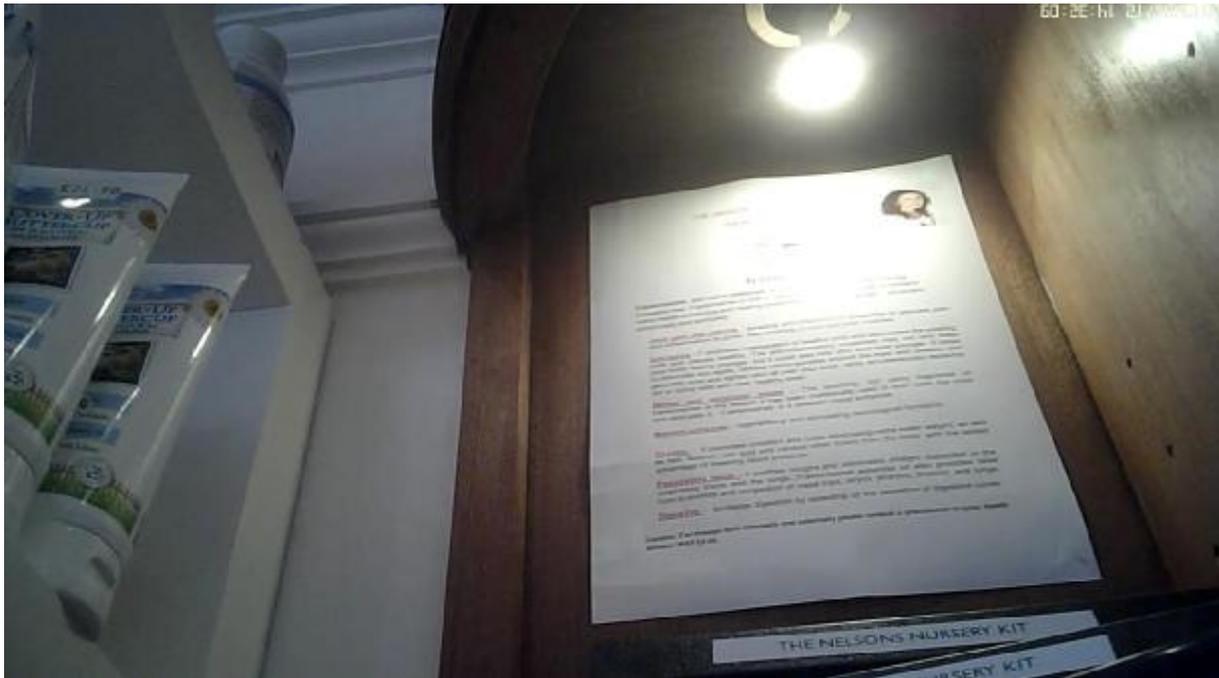
## 1.3. Nelsons homeopathy kits

The following kits of homeopathic medicines were on display for purchase by the public:

- The Nelsons Travellers Companion
- The Nelsons Pre and Post Birth Kit
- The Nelsons Detox Box
- The Nelsons Nursery Kit

The above kits were packaged in black boxes:





- Stop Smoking Kit
- Dentist Kit
- Post Operation Kit

The above kits were packaged in white boxes:



As examples, we examined a few of the kits:

### 1.3.1. The Nelsons Travellers Companion

The bottles of homeopathic medicines are labelled:

- Accidents & Injury

- Allergic Reactions
- Bites & Stings
- Travellers Constipation

There was also a leaflet inside the box that had indications for each homeopathic medicine.



### 1.3.2. The Nelsons Nursery Kit

This contained several bottles of homeopathic pills and a bottle of homeopathic liquid labelled Colic Drop with a dropper, presumably intended to be used to administer the homeopathic medicine to a baby. Other homeopathic medicines in this kit included:

- Allergy relief
- Cough Combination
- Teetha teething granules, which, I understand, has a PLR.



### 1.3.3. The Nelsons Detox Kit



Text on the inside of the box said, "30 Days Detox Box".

The contents included:

- Alfalfa Ø Mother Tincture in a dropper bottle
- Total Detox
- Cardus Marianus Milk Thistle

I note that some of the homeopathic medicines were labelled as Mother Tinctures, (as denoted by the usual Ø symbol). As you will be aware, Mother Tinctures are essentially undiluted herbal medicines and are likely to be of unknown dilution, unknown toxicity, unknown

pharmacological impact, unknown safety and could be contaminated and adulterated. They have the potential to cause serious harm, particularly if any significant quantity is ingested.

I understand that you have previously stated (Bee Health Ltd, Viridian Nutrition) that Milk Thistle products require authorisation before being placed on the UK market.

Other kits contained various liquids and other homeopathic medicines.



I believe these are all unlicensed homeopathic medicines.

I do not believe any of these kits of homeopathic medicines have been authorised by the MHRA.

#### **1.3.4. Basic 18 Kit**

This kit of homeopathic medicines is manufactured by Helios Homoeopathy Ltd. I understand that this kit has been authorised but I am concerned that the containers of homeopathic medicines in the kits are not those of the authorised or registered homeopathic medicines and would not appear to be child-proof.

I also note that the kit contains a 'Mini Materia Medica', which I suspect contains indications when the homeopathic medicines in the kit are likely to be registered without indications.



#### 1.4. Display boxes

Display boxes of a large number of homeopathic medicines in Clikpak tubes with indications on the front, including:

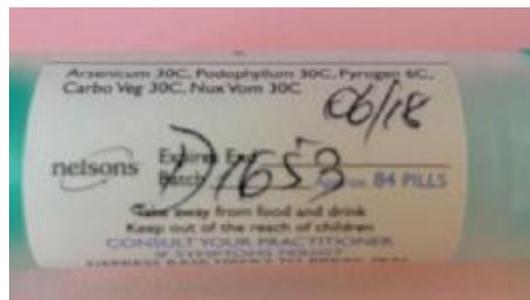
- Aching legs
- Acidity & heartburn
- Alert mind
- Arthritis & Rheumatism
- Back ache & sciatica
- Bites and stings
- Bloating
- Boils & carbuncles
- Catarrh
- Chesty cough
- Cold sore relief
- Computer eye strain
- Concentration
- Constipation
- Cystitis
- Detox support
- Diarrhoea
- Dizziness
- Dry cough
- Flu relief
- Food poisoning
- Gout relief
- Grief and Bereavement
- Haemorrhoids
- Hangover
- Hayfever & allergy
- Healing combo
- Healthy hair
- Jet lag
- Lactation blend
- Mastitis
- Menopause relief
- Mens [*sic*] health
- Migraine headaches
- Morning sickness
- Mouth ulcers
- Nervous anxiety
- Post flu tiredness
- Rheumatism
- Sports injuries
- Womens [*sic*]health
- Youthful skin

I believe these are all unlicensed homeopathic medicines.



### 1.5. Test purchase

Maria MacLachlan purchased one product from one of the above boxes:



The text on the label includes:

NELSONS HOMEOPATHIC PHARMACY

SINCE 1860

DIARRHOEA

Relieves symptoms of diarrhoea & vomiting due to consumption of unwashed fruits, vegetables, bad meat or fish.

Take 2 pills every hour until better.

Arsenicum 30C, Podophyllum 30C, Pyrogen 6C, Carbo Veg 30C, Nux Vom 30C

Expires End 06/18

Batch D1653 Approx 84 PILLS

Take away from food and drink

Keep out of the reach of children

CONSULT YOUR PRACTITIONER IF SYMPTOMS EXIST

The staff member that sold this product did not identify herself as a Registered Pharmacist and had no name badge or other identification and was not the Superintendent Pharmacist. She asked no questions whatsoever: she did not ask what medical condition it was for or who it was for, nor give any advice or instructions about the homeopathic medicine. She took no records of the purchase and did not give us any advice or documentation other than the till receipt. There was no patient information leaflet with the homeopathic medicine. She did not consult any other colleague on the premises.

I believe this is an unlicensed medicine that should not have been on display and should not have been sold to us.

### **1.6. Dr Reckeweg**

There were a number of Dr Reckeweg homeopathic medicines on display. These are manufactured by:

Dr. Reckeweg & Co GmbH  
Berliner Ring 32  
D-64625 Bensheim  
Germany

+49 6251 / 1097-0

<http://www.reckeweg.de>  
[info@reckeweg.de](mailto:info@reckeweg.de)

I understand their contact in the UK is:

Dr. Reckeweg (U.K.) Ltd.  
Dalton House  
33 Leigh Road  
Westhoughton  
Bolton  
BL5 2JE

01942-81 14 44

<http://www.reckeweg.co.uk>  
[info@reckeweg.co.uk](mailto:info@reckeweg.co.uk)

There was a wide range of their BC tissue salt homeopathic products on display, such as BC 6 and BC 19.

I understand that these are unlicensed homeopathic medicines.

### 1.7. Schuessler Tissue Salts

There were a number of Schuessler homeopathic medicines on display. These are manufactured by:

7 Rocklea Drive  
Port Melbourne VIC 3207  
Australia  
+61 3 9427 7422

[info@mandp.com.au](mailto:info@mandp.com.au)

I understand the UK distributor is:

CF Distribution Ltd  
210 Mauretania Road  
Nursling Industrial Estate  
Southampton  
SO16 0YS  
023 8127 7000

<http://www.martinandpleasance.co.uk>

These can also be seen in the photograph on page 11. I understand these are 6X homeopathic 'potency', ie 1 ppm.

I note that they include their 'Kidz' range of homeopathic products aimed at children.

A booklet below the display gave details of the Schuessler medicines.

I understand that these are unlicensed homeopathic medicines.

### 1.8. Heel homeopathic medicines

These are manufactured by:

Biologische Heilmittel Heel GmbH  
Dr. Reckeweg-Straße 2-4  
76532 Baden-Baden  
Germany

I understand their agent in the UK is:

Bio Pathica Ltd  
PO Box 217  
Ashford  
TN23 6ZU

01233 636678

<http://www.biopathica.co.uk>

[info@biopathica.co.uk](mailto:info@biopathica.co.uk)

Heel homeopathic medicines include both the Heel and Homaccord brand names. Many of these came in a variety of forms, some of which were ampoules for injection.

We saw the following homeopathic medicines on sale:

- Ubichinon compositum Ampullen — note that this seems to be intended for injection
- A kit of homeopathic medicines including Homaccord Lymphomyosot and Nux Vomica
- Homaccord Berberis
- Homaccord Nervoheel

- Heel Luffa
- Zeel
- Vertigoheel
- OcculoHeel
- Traumeel S/Traumeel S Gel

Note that the labelling appears to be in German only and that the Heel test purchases mentioned in Bindmans' letter to the DH contained patient information leaflets that were in German only: I strongly suspect these products in Nelsons will be the same.

The Traumeel S appears to be a different product to the Traumeel Ointment that has an NR authorisation, NR 08927/0019. The ingredients for Traumeel S are listed here: <http://www.traumeel.com/Traumeel-com-Ointment.html> and appear to be different to those listed in the PAR for the NR product. The Traumeel S ingredients contain 14 ingredients, seven of which are listed as being Mother Tinctures and others in concentrations as high as 10%.

I believe these are all unlicensed medicines.









### 1.8.1. Oculoheel leaflet

See attached scan of a leaflet for Oculoheel Eye Drops that I obtained from the store on 12 May 2015. Oculoheel is manufactured by:

Biologische Heilmittel Heel GmbH  
 Dr. Reckeweg-Straße 2-4  
 76532 Baden-Baden  
 Germany

It states it is a homeopathic therapy for conjunctivitis, eye irritation and over-strained eyes and claims it is 'equivalent to Tetryzoline'. I believe that Oculoheel is an unlicensed medicine.

### 1.9. Other Mother Tinctures

Other homeopathic medicines/Mother Tinctures we saw included:

- 50 ml Menopause Ø
- 50 ml Peaceful Sleep Ø
- 50 ml Immune Boost Ø
- 50 ml Mouthwash Ø
- Euphrasia Ø 50 ml
- Pythrethium Ø 50 ml
- Thuja Ø 50 ml
- Hayfever Relief Tincture

Some of these were provided with tester bottles for customers to try.

I believe these are unlicensed medicines.

### 1.10. Nelsons Homeopathic Pharmacy 2015 Price List

See attached scan of their 2015 price list that I obtained from the store on 12 May 2015.

This solicits orders from members of the public via their website, email and telephone. An order form is included on page 15.

It lists many unlicensed homeopathic medicines including:

- 56 Klikpak Combinations homeopathic medicines with indications (page 4)
- Tinctures, some of which appear to be homeopathic Mother Tinctures (as denoted by the usual Ø symbol, as described on page 13) with indications (page 5). As you will be aware, Mother Tinctures are essentially undiluted herbal medicines and are likely to be of uncertain constituents, unknown dilution, unknown toxicity, unknown safety and could be contaminated and adulterated. They have the potential to cause serious harm, particularly if any significant quantity is ingested.
- Kits of unlicensed homeopathic medicines (some of which I have identified above):
  - Nelsons Detox Support Kit
  - Nelsons Child Birth Kit
  - Nelsons Smoking Kit
  - Nelsons Dentist Kit
  - Nelsons First Aid Kit
  - Nelsons Surgery Support Kit
  - Nelsons Traveller's Companion
  - Nelsons Nursery Kit
- I.C.C Prevention (Influenza and common cold tablets) (page 5)
- Shock & Distress Tablets (Injury) (page 5)
- Schuessler Salts homeopathic medicines are advertised on the back page

I believe many of these are unlicensed homeopathic medicines. Some may be herbal medicines that are not registered under the THMRS.

## 2. Nelsons websites

I have identified a number of concerns with various pages on Nelsons websites as identified below.

### 2.1. Nelsons Klikpak range

<http://www.nelsonsnaturalworld.com/en-gb/uk/our-brands/nelsons-homeopathy/nelsons-clipaks>

Nelsons Klikpak™ is a range of popular single homeopathic remedies which can be used for everyday ailments such as first aid, skin conditions, digestion problems, colds and flu, women's health, and aches and pains.

...

To learn more about homeopathy, please visit our Heal Through Homeopathy website, which explains homeopathy and how it can be used to address common allergies and every day ailments.

I believe these are indications for products not licensed with indications.

## 2.2. Arnica (NR)

<http://www.nelsonsnaturalworld.com/en-gb/uk/our-brands/nelsons-homeopathy/nelsons-clipaks/arnica>

Nelsons Arnicare™ Arnica 30c is used within the homeopathic tradition for the symptomatic relief of:

- sprains
- muscular aches
- bruising
- swelling after contusions

This is Nelsons Arnicare Arnica 30c pillules NR 01175/0181, the PAR for which is at:

<http://www.mhra.gov.uk/home/groups/par/documents/websiteresources/con049307.pdf>

The indications appear to be in line with the permitted indications.

However, it then says:

A homeopathic medicinal product without approved therapeutic indications.

This is HR wording, not NR.

The text goes on to state:

They can even be dissolved in warm water if preferred.

However, the PAR states:

### 4.2 Posology and method of administration

Adults and children: Take 2 pillules every 2 hours for the first 6 doses, then 4 times daily until symptoms improve for up to a maximum of 7 days. Pillules should either be chewed or placed under the tongue until dissolved.

This makes no mention of dissolving in warm water as a method of administration.

The page also states:

Nelsons Arnicare™ Arnica is also available in a 6c potency.

There is no 6c potency product that has an NR authorisation and this text implies that the 6c HR product has the same indications when it is not registered with indications.

## 2.3. Aconite (HR)

<http://www.nelsonsnaturalworld.com/en-gb/uk/our-brands/nelsons-homeopathy/nelsons-clipaks/aconite>

They can even be dissolved in warm water if preferred.

I do not believe that dissolving in warm water is an approved method of administration for this homeopathic medicine.

All other HR products have the same wording.

## 2.4. TISSUE SALTS (SCHUESSLER)

<http://www.nelsonspharmacy.com/shop-online/brand/tissue-salts-schuessler>

<http://www.nelsonspharmacy.com/shop-online/brand/tissue-salts-schuessler?page=1>

<http://www.nelsonspharmacy.com/shop-online/brand/tissue-salts-schuessler?page=2>

There are 13 products in total, some (such as <http://www.nelsonspharmacy.com/shop-online/brand/tissue-salts-schuessler/Schuessler---Ferrum-Phos-6X---Tablets>) have indications. These are homeopathic medicines manufactured by Martin & Pleasance (see above for details). I believe these are unlicensed homeopathic medicines. Note that these products are available widely in the UK.

## 2.5. ARNICARE ARNICA 30C CLIKPAK

<http://www.nelsonspharmacy.com/shop-online/brand/arnicare/arnicare-clipak/arnicare-arnica-30c-clipak>

Indications: For the symptomatic relief of sprains, muscle aches, bruising and swelling after contusions.

This text is not in accordance with the wording specified in the PAR:

### 4.1 Therapeutic indications

A homeopathic medicinal product used within the homeopathic tradition for the symptomatic relief of sprains, muscular aches and bruising and swelling after contusions.

The text I have highlighted is missing from the web page.

## 2.6. ARNICARE ARNICA 6C CLIKPAK

<http://www.nelsonspharmacy.com/shop-online/brand/arnicare/arnicare-clipak/arnicare-arnica-6c-clipak>

<http://www.nelsonspharmacy.com/shop-online/brand/arnicare>

This shows a product clearly labelled as Arnica 6C and is in the purple coloured tube of their other NR product, Arnica 30C, and not the green coloured tube of their HR products. The page gives the following indication:

Indications: For the symptomatic relief of sprains, muscle aches, bruising and swelling after contusions.

I believe this product does not have an NR authorisation.

This product does not have the text prescribed for an HR product.

## 2.7. CLIKPAK

<http://www.nelsonspharmacy.com/shop-online/brand/clipak>

All the products listed on this page are HR registered.

FOR EVERYDAY ACUTE SYMPTOMS

Nelsons Clipak™ is a range of popular single homeopathic remedies which can be used for everyday ailments such as first aid, skin conditions, digestion problems, colds and flu, women's health, and aches and pains.

All products listed on this page (25 products) have the same text as Aconite 30C.

These indications are the same as the ones on the edge of the shelf in their display stands, which you have already ruled are not permitted.

## ACONITE 30C

<http://www.nelsonspharmacy.com/shop-online/brand/cliipak/cliipak-30c/aconite-30c>

Indications: Nelsons Cliipak™ is a range of popular single homeopathic remedies which can be used for everyday ailments such as first aid, skin conditions, digestion problems, colds and flu, women's health, and aches and pains.

This product is not permitted indications.

They can even be dissolved in warm water if preferred.

I do not believe that dissolving in warm water is an approved method of administration for this homeopathic medicine.