CENTER FOR INQUIRY
EXECUTIVE OFFICES

Office of Consumer Protection from Pseudoscience

August 27, 2026

Submitted via email

Senator Bill Cassidy
Chairman
Senate Committee on Health, Education, Labor, and Pensions
455 Dirksen Senate Office Building
Washington, DC 20510

Re: Opposition to S. 4692, the "Homeopathic Drug Product Safety, Quality, and Transparency Act"

Dear Senator Cassidy:

On behalf of the Center for Inquiry (CFI)—a nonprofit organization dedicated to advancing science-based policy—its supporters, and a coalition of scientists, medical experts, and public health professionals, we respectfully urge you to oppose S. 4692. **Despite its name, the so-called "Homeopathic Drug Product Safety, Quality, and Transparency Act" would achieve the opposite, granting unprecedented power to an industry shrouded in secrecy and characterized by consumer fraud.**

As written, S. 4692 prevents the Food and Drug Administration (FDA) from protecting people, pets, and agricultural animals by allowing human and veterinary drugs to be sold without the scientifically proven safety and efficacy currently required by the Food, Drug, and Cosmetic Act (FDCA).

The bill also renders the Federal Trade Commission (FTC) incapable of protecting consumers from false advertising and deceptive trade practices. S. 4692 delegates federal regulatory authority to a private, homeopathy industry-aligned entity called the "Homeopathic Pharmacopoeia Convention of the United States" (HPCUS). The bill grants HPCUS total control to set national drug standards, product safety requirements, manufacturing standards, and consumer protection rules for its own funders.

Current Status of Homeopathic Drugs

Homeopathic drugs have been regulated by the FDA for decades. As with all products that claim to diagnose, cure, or prevent disease, manufacturers of homeopathic drugs must meet certain approval standards before they can be sold lawfully.[1] To comply with the FDCA, a

[1] While the Findings section of S. 4692 states that homeopathic drugs have not been subject to premarket approval, this is incorrect. See *MediNatura, Inc. v. FDA*, 998 F.3d 931, 935-36 (D.C. Cir. 2021). (FDA guidance "did not

manufacturer must demonstrate to the FDA that there is substantial scientific evidence of the drug's effectiveness and safety—something that is proven with adequate and well-controlled clinical trials, the results of which are available for public scrutiny.

Currently, there are no approved homeopathic drugs, and the marketing and sale of these products is illegal.[2] As part of its enforcement of the FDCA, the FDA's Center for Drug Evaluation and Research (CDER) and Center for Veterinary Medicine (CVM) have repeatedly taken action against the unlawfully sold drugs.[3]

What Are Homeopathic Drugs?

Homeopathy is health care fraud; the homeopathic drug industry bamboozles U.S. consumers to the tune of billions of dollars every year. Homeopathy is based on ideas from an eighteenth-century huckster who believed that all illness, injuries, disease, and ailments could be treated, healed, or cured through the use of one of over a thousand various items—including toxic plants, animal venom, noxious gasses, controlled substances, heavy metals, radioactive materials, bacteria, parasites, virus particles, and bodily excretions. The catch: the substance first must be diluted to the point that there is no trace of the original substance. Fundamentally, homeopathic drugs are nothing more than sugar pills fraudulently marketed as science-based medicine.

There is simply no medical basis for homeopathy. No credible scientific study has ever shown that homeopathy has any effect on an ailment beyond that of a placebo.[4] And yet, homeopathy has become a lucrative and profitable industry because manufacturers' deceptive marketing and attractive product packaging deceive consumers into believing that their products are equivalent to drugs approved by the FDA.

Why the Homeopathy Industry Promotes S. 4692

Homeopathic drugs are inherently ineffective while also not inherently safe. As noted above, there are no approved homeopathic drugs. The FDA has warned the public that "[s]ince homeopathic products have not been approved by the FDA for any use, they have not been demonstrated to meet the FDA's standards for safety, effectiveness, and quality."[5]

Moreover, no homeopathic drug manufacturer has even applied for approval. That's because these drug manufacturers are fully aware they cannot satisfy the standards applied by scientists

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exempt homeopathic drugs from approval requirements and, while [earlier guidance] was in place, the FDA took enforcement steps against certain unapproved homeopathic drugs.")

[2] FDA CDER Executive Operations, letter to Nicholas J. Little, Center for Inquiry (October 30, 2023) ("No homeopathic drug products have been approved under either of the two regulatory pathways [the application process or the OTC monograph process]. Therefore, homeopathic drugs are considered unapproved new drugs and are marketed illegally in the United States.")

[3] See infra.

[4] https://centerforinquiry.org/learning-resources/explaining-homeopathy

[5] https://www.fda.gov/consumers/consumer-updates/what-does-fda-approve-part-2

and medical experts. **Rather than concede their fraud, homeopathic manufacturers now seek to have Congress hold the wool while they pull it over the eyes of the sick and injured.**

The question of whether these products have any proven medical use has been answered in the negative by countless government agencies and health experts across the world. The National Center for Complementary and Integrative Health (NCCIH), a part of the National Institutes of Health (NIH), found "[t]here is little evidence to support homeopathy as an effective treatment for any specific condition" and warned Americans that they should not "use homeopathy as a replacement for proven conventional care or to postpone seeing a health care provider about a medical problem."[6]

The federal government has repeatedly issued warnings about the dangers of relying on homeopathic products to deal with serious conditions and taken action to protect the public, cutting into manufacturers' profits.

For instance, the FDA recently took action against Stellalife, Inc. because:

> [Stellalife's] homeopathic drug products are especially concerning from a public health perspective because they are marketed for use in vulnerable populations, i.e., children and patients at high risk for developing an infection, such as those with open oral wounds or postoral surgery. Use of your products in these populations is even more concerning because some of your products have been recalled due to microbial contamination.[7]

In 2025, the FDA announced it took action against six companies selling unapproved drugs that claimed to treat and control seizures in dogs and cats, including against Veterinary Select Formula for its homeopathic products the company claimed are a "natural alternative to traditional drug therapy [and] beneficial for pets with elevated liver enzymes" that can "control and reduce quantity, duration, [and] severity of chronic seizures [and] epilepsy (shaking, tremors, loss of body control, etc.)."[8]

In 2023, Boiron, Inc., the largest manufacturer of homeopathic drugs, was warned by the FDA that:

> [Boiron's] unapproved "Optique 1 Eye Drops" drug product is especially concerning from a public health perspective. Ophthalmic drug products, which are intended for administration into the eyes, in general pose a greater risk of harm to users because the route of administration for these products bypasses some of the body's natural defenses.[9]

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[6] National Center for Complementary and Integrative Health, Homeopathy (April 2015), available at https://nccih.nih.gov/health/homeopathy#hed8
[7] FDA Warning Letter MARCS-CMS 712804 (September 16, 2025).
[8] FDA Warning Letter MARCS-CMS 696354 (November 12, 2024).
[9] FDA Warning Letter MARCS-CMS 663402 (September 11, 2023).

In 2019, the FDA took action against Nutra Pharma Corp. for its sale of homeopathic drugs the manufacturer claimed could treat and cure "rheumatoid arthritis, various cancers, chronic pain, cancer pain, herpes zoster, diabetes, fibromyalgia, and opioid addiction."[10]

When microbial contamination in a manufacturing facility was found in 2018, the FDA "alert[ed] consumers and pet owners of Silver Star Brand's voluntary recall of homeopathic drug products."[11]

And, when the FDA analyzed homeopathic teething tablets, it found the levels of atropine and scopolamine in some of the tablets sold by CVS, and the levels of scopolamine in some of the tablets sold by the manufacturer Hyland's, far exceeded the amount stated on the products' labels. As part of its oversight, the FDA requested that Standard Homeopathic Company recall its Hyland's Baby Teething Tablets after concluding that the products had "been found to contain inconsistent amounts of belladonna alkaloids [deadly nightshade] that may differ from the calculated amount on the products' labels." Hundreds of adverse effects were reported, and the product was recalled.

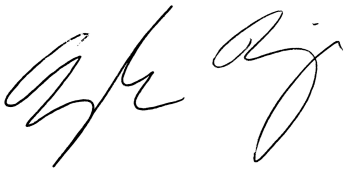
It's no wonder the homeopathy industry wants to avoid FDA scrutiny.

Conclusion

S. 4692 is ill-conceived and dangerous. Its passage would inevitably cause the exact harm that the FDCA was intended to prevent. **The driving purpose behind the bill is to make it easier for the homeopathy industry to continue to defraud and endanger consumers; federal lawmakers should be doing all they can to prevent that from happening.** The FDA and FTC should impose greater scrutiny on this fraudulent industry, not be precluded from regulating it.

CFI and its experts are available to testify or answer any questions you may have about this bill, about homeopathy, and about other pseudoscientific practices.

Sincerely,



Azhar Majeed
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[10] FDA Warning Letter MARCS-CMS 563949 (March 11, 2019).
[11] https://www.fda.gov/drugs/drug-safety-and-availability/fda-alerts-consumers-and-pet-owners-silver-star-brands-voluntary-recall-homeopathic-drug-products

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cc:
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