



20.09.2016

“Fourth list entries of stocks for which homeopathic use is justified”

Overview of comments received on draft document

“Fourth list entries of stocks for which homeopathic use is justified” as released for public consultation on the HMA website until 11/03/2016

TRANSMISSION TO HMA for release for consultation	11 December 2015
DEADLINE for comments	11 March 2016
PRESENTATION IN THE HMPWG	14-15 April 2016
DISCUSSION WITHIN THE SUBGROUP	20 September 2016
ADOPTION BY THE HMPWG for publication on HMA-website	10 November 2016

Overview of comments received

Table 1: Origin of comments

HMPWG – Fourth list entries of stocks for which homeopathic use is justified as released for public consultation on the HMA website until 11/03/2016

	Organisation and/or individual
1	AESGP
2	ECHAMP
3	ECCH

Table 2: Discussion of comments

GENERAL COMMENTS		
Interested party	Comment and Rationale	Outcome
AESGP	<p>AESGP represents the manufacturers of non-prescription medicines, including herbal and homeopathic medicines, in Europe.</p> <p>AESGP welcomes the “list of stocks for which homeopathic use is justified” because reference to the list may facilitate application within the simplified registration procedure according to Article 14 of Directive 2001/83/EC.</p> <p>In general we would like to propose that all substances/stocks for homeopathic use which are described in the European Pharmacopoeia, the French Pharmacopoeia or the German Homoeopathic Pharmacopoeia (HAB) be automatically included in the list. As they are described in these official pharmacopoeias, their homeopathic use has already been acknowledged and is therefore justified.</p> <p>We would also appreciate it if the following could be added:</p> <ul style="list-style-type: none"> - 1st column ‘Name of the stock’: please add the Latin homeopathic name, as used in the French tradition - 2nd column ‘Pharmacopoeia for detailed definition of raw material’: please add reference to FP and Ph. Eur. if necessary - 3rd column ‘Definition of the raw material’: please add the raw material of stock as described in FP or in accordance with the French homeopathic tradition. 	<p>Not agree.</p> <p>This comment was already made during the public consultation of the draft document “Third list entries of Stocks for which homeopathic use is justified” and therefore the outcome is the same.</p> <p>⇒ the mention of a Pharmacopoeial reference in the list is to ensure an official definition for each stock; it is not a sufficient way to justify homeopathic use.</p> <p>It should be pointed out that the sub-group will ensure that it takes into account the work of the European Pharmacopoeia in order to insure that stocks that are considered are only those where the homeopathic use can be justified.</p> <p>The content of the different columns was discussed enough during the first sub-working group meetings. The priority of the sub-group is actually to justify the homeopathic use of new stocks.</p> <p>1st column: as mentioned in the document “Preamble to the consolidated list of justified homeopathic stocks”, the name of the stock comprises the first <u>traditional Latin name</u> as in the French Pharmacopoeia (FP) monograph</p> <p>2nd column: Reference to FP and Ph. Eur. are made when appropriate</p> <p>3rd column: If a reference to a Pharmacopoeial monograph is</p>

GENERAL COMMENTS		
Interested party	Comment and Rationale	Outcome
		made, detailed description is considered unnecessary.
AESGP	In addition, for transparency purposes, the literature references used as basis for each substance entry should be published since the compilation of bibliographic data on the homeopathic use of specific homeopathic stocks/preparations is one objective of the HMPWG Homeopathic use subgroup.	References mentioned in this database and used to justify the homeopathic use of the stocks are published references accessible by the general public, related to Materia Medica and the traditional provings.
ECHAMP	For transparency the literature references used as basis for each substance entry should be published since the compilation of bibliographic data on the homeopathic use of specific homeopathic stocks/ preparations is one objective of the HMPWG Homeopathic use subgroup.	
AESGP	To improve the benefit of the different lists of justified stocks, we suggest consolidating them into one list in alphabetical order.	A consolidated list of justified homeopathic stocks is now published on the HMA website.
ECHAMP	To improve the benefit of all (now 4) lists of justified homeopathic stocks we suggest consolidating them into one single list in alphabetical order.	
AESGP ECHAMP	<p>The declaration Ph. Eur. <xxx> (GHP/FP) is used comprehensively.</p> <p>We would appreciate differentiation whether Ph. Eur. is considering the raw material solely, amended by a GHP/FP monograph characterising the stock or if a Ph. Eur. monograph for the homeopathic preparation (starting material and homeopathic stock) exists. We suggest declaration as follows:</p> <ul style="list-style-type: none"> ➔ Ph. Eur. <xxx> / GHP / FP → if the raw material is considered by Ph. Eur. and the stock in the GHP/FP ➔ Ph. Eur. <xxx> (GHP/FP) → if a monograph for the respective homeopathic preparation exists in Ph. Eur. (raw material and homeopathic stock) 	Not agree.
AESGP	In the current list, citations of the GHP are sometimes not literal. In the attached excel file, we commented on the concerned materials individually. For the state of correctness, we would appreciate literal citations of the referenced monographs for future lists.	The citations were corrected and updated according to the current GHP monographs.
ECHAMP	In the current list citations of the GHP are sometimes not literally. Therefore, we commented	

GENERAL COMMENTS		
Interested party	Comment and Rationale	Outcome
	the concerned materials individually in the list (see document attached). For future lists we would appreciate literal citation of the referenced monographs, because otherwise our effort for checking the lists is unplanned huge.	
ECHAMP	There are duplications between the lists of justified stocks, e.g. Kalium chloratum is listed in the third and in the fourth list. This can be avoided when one single list of justified homeopathic stocks is created, see comment above.	A consolidated list of justified homeopathic stocks is now published on the HMA website.

SPECIFIC COMMENTS ON TEXT			
Concerned stock (first column of the table)	Interested party	Comment and Rationale (ECHAMP: red writing = to be added)	Outcome
Achillea millefolium, Millefolium / Millefolium	ECHAMP	Fresh aerial parts of Achillea millefolium L., collected at flowering time / Fresh whole flowering plant of Achillea millefolium L. One box, but different plant parts?	Agree ⇒ two entries
Achillea millefolium, Millefolium / Millefolium	AESGP ECHAMP	Achillea millefolium, Millefolium / Millefolium / Achillea millefolium ferm 33d GHP/FP/ GHP Fresh aerial parts of Achillea millefolium L., collected at flowering time / Fresh whole flowering plant of Achillea millefolium L. / Fresh aerial parts of Achillea millefolium L., collected at flowering time	Not agree Currently, we do not have any literature to support homeopathic use of this kind of preparation.
Aesculus hippocastanum, Aesculus/ Aesculus hippocastanum, Aesculus	AESGP ECHAMP	Aesculus hippocastanum, Aesculus/ Aesculus hippocastanum, Aesculus / Rosskastaniensamen GHP/FP/ DAB Freshly peeled seeds of Aesculus hippocastanum L. / Fresh seed of Aesculus hippocastanum L. / Dried seeds of Aesculus hippocastanum L.	Not agree GHP is the homoeopathic part of the Pharmacopoeia of Germany (DAB). Given that Aesculus is mentioned in the GHP, reference to DAB is not useful and not appropriate to define the stock of Aesculus.

Acidum benzoicum e resina / Benzoicum acidum	AESGP	Benzoic acid sublimed from Siam benzoin, containing minimum 94 per cent of acids / Benzoic acid C ₇ H ₆ O ₂ The description should be in accordance with the GHP, please adapt as suggested.	Not agree. If a reference to a Pharmacopoeial monograph is made, detailed description is not useful (harmonisation with the approved previous lists).
Arnica montana, Arnica (radix)	AESGP	In the GHP, "radix" is not included in the monograph title, therefore please delete. Arnica is the only plant monograph with defined content in the list, although for several plants the content is specified in the GHP monograph. We suggest deleting the declaration of content.	Delete "(radix)": not agree Given that little information justifying the homeopathic use is available and that chemical composition is different from that of the flowers, it was decided to accept Arnica montana radix as another stock in the list with condition to add radix in brackets in the name. Delete "min. 15 ml of essential oil per kg of herbal drug": not agree According to the literature, the essential oil is responsible of the homeopathic activity of this stock. Therefore it was considered as important to specify its level in the raw material.
Arnica montana, Arnica (radix)	ECHAMP	We are very pleased to find that "Arnica GHP" (relevant part: radix) is considered in the current list, after we contributed with literature for this material after the first list of stocks, where only "Arnica ex planta tota" was included. In the GHP, „radix" is not included in the monograph title, therefore please delete. Arnica is the only plant monograph with defined content in the list, although for several plants the content is specified in the GHP monograph. We suggest to delete the declaration of content.	
Arnica montana, Arnica (radix)	AESGP ECHAMP	Arnica montana, Arnica (radix) GHP Dried underground parts of Arnica montana L. (min. 15 ml of essential oil per kg of herbal drug)	
<i>Proposal of adding a new entry</i>	AESGP ECHAMP	Arnica flower Ph.Eur. 1391 Whole or partially broken, dried flower-heads of Arnica montana L.	Not agree. Given that Arnica is mentioned in the homeopathic parts of the German and French Pharmacopoeias, reference to the non-homeopathic part of the Ph. Eur. is not useful and not appropriate to define the stock of Arnica.

Avena sativa / Avena sativa	AESGP	Avena sativa / Avena sativa / Avena sativa 2b GHP/FP/ GHP Fresh aerial parts of Avena sativa L., collected at flowering time / Fresh blooming flowering aerial parts of Avena sativa L. / Fresh aerial parts of Avena sativa L., collected at flowering time	“blooming” instead of “flowering”: not agree In the Ph. Eur.; the English translation of “fleuri(es)” is “flowering” Partially agree : see below Avena sativa (2b) / Avena sativa GHP/FP Fresh aerial parts of Avena sativa L., collected at flowering time / Fresh flowering aerial parts of Avena sativa L.
Avena sativa / Avena sativa	ECHAMP	Avena sativa / Avena sativa / Avena sativa ferm 33c / Avena sativa 2b GHP/FP/ GHP/GHP Fresh aerial parts of Avena sativa L., collected at flowering time / Fresh blooming flowering aerial parts of Avena sativa L. / Whole fresh flowering plants of Avena sativa L., collected when the grain has ripened to the milky stage / Fresh aerial parts of Avena sativa L., collected at flowering time “blooming” as written in the FP in English (see ANSM website)	“blooming”: see above 2b: see above 33c: Not agree Currently, we do not have any literature to support homeopathic use of this kind of preparation.
Bellis perennis / Bellis perennis	ECHAMP	Whole fresh flowering plants of Bellis perennis L. / idem	Partially agree The definition is repeated given that it is mentioned in two different monographs
Berberis vulgaris, Berberis	AESGP ECHAMP	Berberis vulgaris, Berberis / Berberis vulgaris e fructibus, Berberis, Fructus GHP / GHP Dried bark of aerial and underground parts of Berberis vulgaris L. / Whole, fully ripened berries of Berberis vulgaris L., stripped off the fruit stalks	Not agree It concerns a different plant part ⇒ another entry in the list Berberis vulgaris e fructibus (GHP): Currently, we do not have any literature to support homeopathic use of this kind of preparation.
Bryonia / Bryonia	AESGP ECHAMP	Fresh root of Bryonia cretica L. subsp. Dioica dioica (Jacq.) Tutin or Bryonia alba L., harvested before flowering / Fresh underground parts of Bryonia cretica L. subsp. Dioica dioica (Jacq.) Tutin or Bryonia alba L.	Agree
Bryonia / Bryonia	ECCH	“Bryonia alba” is the only species that corresponds to the original provings. “Bryonia cretica subsp. Dioica”, a species with significant biological differences, is used by some manufacturers but does not correspond the original provings ¹ . ¹ Dipl.pharm. Gabriele Schwarze---Grossmann (1996): Arzneimittelherstellung und Arzneiqualität, http://www.imf.ch/publikationen/cont_pub_homeo5.htm	According to the encyclopedia of Pure Materia Medica (Allen), there is no distinction related to the homeopathic use of both species. Bryonia is a mixture of different species. Commission D monograph also supports homeopathic use of both species.

Bryonia / Bryonia	ECHAMP	Bryonia / Bryonia / <i>Bryonia cretica</i> ferm 33b, <i>Bryonia e radice</i> ferm 33b GHP/FP/ GHP Fresh root of <i>Bryonia cretica</i> L. subsp. <i>dioica</i> (Jacq.) Tutin or <i>Bryonia alba</i> L., harvested before flowering / Fresh underground parts of <i>Bryonia cretica</i> L. subsp. <i>dioica</i> (Jacq.) Tutin or <i>Bryonia alba</i> L. / Fresh roots of <i>Bryonia cretica</i> L. subsp. <i>dioica</i> (Jacq.) Tutin, harvested before shoots are produced	Not agree Currently, we do not have any literature to support homeopathic use of this kind of preparation.
Calcareum phosphoricum	AESGP ECCH	Calcareum phosphoricum	Agree
Calcareum phosphoricum	AESGP ECHAMP	Mixture of calcium phosphates (35.0 to 40.0% of Ca)	Not agree. If a reference to a Pharmacopoeial monograph is made, detailed description is not useful (harmonisation with the approved previous lists).
Calcium iodatum, Calcium iodatum / Calcareum iodatum	AESGP	Calcium iodide $\text{CaI}_2 \cdot x \cdot 4 \text{H}_2\text{O}$ Formal correction	Not agree See the writing of chemical formulas in the Ph. Eur.
Calcium iodatum, Calcium iodatum / Calcareum iodatum	ECHAMP	Calcium iodatum, Calcium iodatum / Calcareum iodatum Denomination not found	Not agree. Calcareum iodatum is the name mentioned in the French version of the Ph. Eur. monograph. Unlike HAB, FP chose to delete its monographs once the stock is mentioned in the Ph. Eur.
Calcium phosphoricum	AESGP	Calcium hydrogen phosphate dihydrate $\text{CaHPO}_4 \cdot x \cdot 2 \text{H}_2\text{O}$ Formal correction	Not agree See the writing of chemical formulas in the Ph. Eur.
Calendula officinalis, Calendula / Calendula officinalis	ECHAMP	Calendula officinalis, Calendula / Calendula officinalis / Calendula flower GHP/FP/Ph. Eur. 1297 Fresh aerial parts of <i>Calendula officinalis</i> L., collected at flowering time / Fresh flowering flower head, with about 15 cm of stem, of cultivated forms with double flowers of <i>Calendula officinalis</i> L. / Whole or cut, dried, and fully opened flowers that have been detached from the receptacle of the cultivated, double-flowered varieties of <i>Calendula officinalis</i> L.	Not agree. Given that <i>Calendula</i> is mentioned in the homeopathic parts of the German and French Pharmacopoeias, reference to the non-homeopathic part of the Ph. Eur. is not useful and not appropriate to define the stock of <i>Calendula</i> .
Calendula officinalis 2a	Sub-group JHU	GHP Fresh aerial parts of <i>Calendula officinalis</i> L., collected at flowering time	Partially agree : see below <i>Calendula officinalis</i> (2a), Calendula / Calendula officinalis GHP/FP Fresh aerial parts of <i>Calendula officinalis</i> L., collected at flowering time / Fresh flowering flower head, with about 15 cm of stem, of cultivated forms with double flowers of <i>Calendula officinalis</i> L.

Chelidonium majus, Chelidonium Fresh rhizome and adherents roots	AESGP	Fresh rhizome and adherents roots of Chelidonium majus L., collected during late autumn or on the appearance of the first shoots containing 0,06 – 0,20 % (m/m) alkaloids, calculated as chelidonine (C₂₀H₁₉NO₅; Mr 353,4) The description should be in accordance with the GHP, please adapt as suggested.	Not agree. If a reference to a Pharmacopoeial monograph is made, detailed description is not useful (harmonisation with the approved previous lists).
Chelidonium majus, Chelidonium Fresh rhizome and adherents roots	ECHAMP	Chelidonium majus, Chelidonium / Chelidonium majus Rh, Chelidonium Rh GHP/GHP Fresh rhizome and adherents roots of Chelidonium majus L., collected during late autumn or on the appearance of the first shoots / Fresh rhizome and adherent roots of Chelidonium majus L., collected during late autumn or on the appearance of the first shoots	Not agree Currently, we do not have any literature to support homeopathic use of this kind of preparation.
Chelidonium majus, Chelidonium Fresh whole flowering plants	AESGP ECHAMP	Fresh whole Whole fresh flowering plants of Chelidonium majus L.	Agree
Chelidonium majus, Chelidonium Fresh whole flowering plants	ECHAMP	Chelidonium majus, Chelidonium / Chelidonium majus e floribus, ethanol. Digestio FP/GHP Whole fresh flowering plants of Chelidonium majus L. / Fresh flowers of Chelidonium majus L.	Not agree Currently, we do not have any literature to support homeopathic use of this kind of preparation.
Cimicifuga racemosa	AESGP ECHAMP	Cimicifuga racemosa, Cimicifuga / Actaea racemose, Cimicifuga GHP/FP Fresh rhizome and adherents roots of Cimicifuga racemosa (L.) Nutt. / Dried underground organs of Cimicifuga racemose (L.) Nutt. Please add the GHP synonym “Cimicifuga”	Agree
Cinnabar	AESGP	Cinnabar / Cinabre	Agree
Cinnabar	ECHAMP	Cinnabar Hydrargyrum sulfuraturn rubrum, Cinnabaris HgS, Red mercury sulphide Naturally occurring mineral cinnabar, containing not less than 90% of HgS Cinnabar” is not a name used in the GHP. The GHP monograph says Hydrargyrum sulfuraturn rubrum, syn. Cinnabaris. The name should be corrected. Also the description of the raw should be in accordance with the GHP, please adapt as suggested.	Not agree Cinnabaris: see list 3 (red mercury sulphide, 100% HgS). Cinnabar is the English translation of Zinnober (HAB) in the GHP (naturally occurring mineral cinnabar: 90 % of HgS)
Cinnabar	ECHAMP	Cinnabar / Cinabre	Agree

Coffea arabica / Coffea cruda	AESGP	<p>Ripe, dried, unroasted seeds of Coffea arabica L. with the seed coat (silver skin) largely removed containing minimum 1.0 per cent of caffeine (C₈H₁₀N₄O₂; Mr 194.2) / Dried green seed of Coffea arabica L., of Coffea canephora Pierre ex Fröhner and varieties of these species.</p> <p>The description should be in accordance with the GHP, please adapt as suggested.</p>	<p>Not agree.</p> <p>If a reference to a Pharmacopoeial monograph is made, detailed description is not useful (harmonisation with the approved previous lists).</p>
Crataegus	AESGP ECHAMP	<p>Fresh ripe fruits of Crataegus laevigata (Poir.) DC., Crataegus monogyna Jacq., their mixture hybrids and mixtures thereof</p> <p>The German word "Bastard" should better be translated with "hybrids". Change mixture to mixtures.</p>	Agree: update according to GHP, 12 th Supplement 2015
<i>Proposal of adding a new entry</i>	AESGP ECHAMP	<p>Craetaegus oxyacantha FP Fresh flowering tops of Crataegus monogyna Jacq. (Lindm.) or Crataegus laevigata (Poir.) D C. (synonym: Crataegus oxyacantha L.) or their hybrids, or mixture thereof Fresh ripe fruits of Crataegus monogyna Jacq. (Lindm.) or Crataegus laevigata (Poir.) D C. (synonym: Crataegus oxyacantha L.) or their hybrids, or mixture thereof</p> <p>The homoeopathic stock is the mixture of equal volumes of the mother tincture prepared with the fresh flowering tops and the mother tincture prepared with fresh ripe fruits.</p>	Currently, we do not have any literature to support homeopathic use of this kind of preparation.
Delphinium staphisagria, Staphysagria / Staphysagria	AESGP	<p>Delphinium staphysagria, Staphysagria / Staphysagria Ph. Eur. 2289 (GHP/FP) Dried ripe seeds of Delphinium staphysagria L. containing minimum 1.5 per cent of alkaloids calculated as delphinine (C₃₃H₄₅NO₂; Mr 599.7) / Dried seed of Delphinium staphysagria L.</p> <p>Please correct typing errors. In the GHP the spelling of the Synonym is Staphisagria. Also the description should be in accordance with the GHP, please adapt as suggested.</p>	<p>GHP: Delphinium staphisagria, Staphisagria French translation (Ph. Eur.) :Staphysagria Latin name: Delphinium staphisagria</p>
Delphinium staphisagria, Staphysagria / Staphysagria	ECHAMP	<p>Delphinium staphisagria, Staphysagria / Staphysagria Staphisagria, Delphinium staphisagria GHP/FP Ph.Eur. 2289 (GHP) Dried ripe seeds of Delphinium staphisagria L. / Dried seed of Delphinium staphysagria L.</p>	Agree taking into account that the GHP monograph will be updated in order to comply with the new Ph. Eur. monograph (January 2016)

Digitalis purpurea, Digitalis / Digitalis purpurea, Digitalis	AESGP ECHAMP	Fresh leaves from two-year-old specimens of Digitalis purpurea L., collected at before flowering time / Fresh leaves from two-year-old specimens of Digitalis purpurea L., collected just before flowering time The translation is not correct, the German original GHP monographs says "... collected before flowering time" – there is a translation mistake in the English GHP version!	"vor der Blütezeit" = "before flowering time" Agree
Echinacea purpurea	AESGP ECHAMP	Echinacea purpurea / Echinacea purpurea ex planta tota, Echinacea purpurea, Planta tota GHP/GHP Fresh aerial parts of Echinacea purpurea (L.) Moench, collected at flowering time / Whole fresh flowering plants of Echinacea purpurea (L.) Moench	Partially agree It concerns a different plant part ⇒ another entry in the list is possible if the stakeholder send the homeopathic use references for that specific plant part.
Eucalyptus globulus, Eucalyptus / Eucalyptus globulus	AESGP	Whole or cut, dried leaves of older branches of Eucalyptus globulus Labill. The herbal drug complies with the Ph. Eur. Monograph on Eucalyptus leaf. The description should be in accordance with the GHP, please adapt as suggested.	Not agree In this column only the definition of the raw material is mentioned.
Ferrum phosphoricum / Ferrum phosphoricum, Ferri phosphas	AESGP	Hydrated iron (III) phosphate $\text{FePO}_4 \cdot x \text{H}_2\text{O}$ containing minimum 34.0 and max 37.0 per cent of Fe (Ar. 55.85), calculated with reference to the substance dried at 200°C. The description should be in accordance with the GHP, please adapt as suggested. Formal correction.	Not agree. If a reference to a Pharmacopoeial monograph is made, detailed description is not useful (harmonisation with the approved previous lists).
Ferrum phosphoricum, Ferroso-ferri phosphas	AESGP	Mixture of octohydrated iron (II) phosphate $\text{Fe}_3(\text{PO}_4)_2 \cdot x \text{H}_2\text{O}$, hydrated iron (III) phosphate $\text{FePO}_4 \cdot x \text{H}_2\text{O}$ and some hydrated iron oxydes. Formal correction.	Not agree See the writing of chemical formulas in the Ph. Eur.
Hamamelis virginiana, Hamamelis / Hamamelis, Hamamelis virginiana	ECHAMP	Hamamelis virginiana, Hamamelis / Hamamelis, Hamamelis virginiana / Hamamelis virginiana ex cortice summitatibusque GHP/Ph. Eur. 0909 (leaf) (FP)/GHP Fresh bark of Hamamelis virginiana L., from the roots or branches or a mixture thereof / Mixture of one part of whole or cut, dried leaf and one part of dried stem bark of Hamamelis virginiana L. / Mixture of one part of fresh bark from the branches and two parts of tips of fresh twigs of Hamamelis virginiana L.	Partially agree It concerns 3 different plant parts ⇒ 3 entries in the list. Currently, we do not have any literature to support homeopathic use of this kind of preparation
Proposal of adding a new entry	ECHAMP	Hamamelis virginiana e foliis, Hamamelis, Folium GHP Fresh leaves of Hamamelis virginiana L.	Not agree. Currently, we do not have any literature to support homeopathic use of this kind of preparation
Histaminum dihydrochloricum, Histaminum hydrochloricum / Histaminum muriaticum	AESGP	Histamine dihydrochloride $\text{C}_5\text{H}_{11}\text{Cl}_2\text{N}_3$ complies with the Ph. Eur. Monograph on Histamine dihydrochloride	Not agree In this column only the definition of the raw material is mentioned.

Histaminum	Sub-group JHU	FP Ph. Eur. 2671 Histamine $C_5H_9N_3$	Update according to the new Ph. Eur. Monograph (04/2016)
Humulus lupulus, lupulus / Humulus lupulus recens	AESGP ECHAMP	Humulus lupulus, lupulus Lupulus / Humulus lupulus recens	Agree
<i>Proposal of adding a new entry</i>	AESGP	Humulus lupulus / Humulus lupulus siccus FP Dried female inflorescence of Humulus lupulus L.	Currently, we do not have any literature to support homeopathic use of this kind of preparation
Hyoscyamus niger, Hyoscyamus	ECHAMP	Hyoscyamus, Hyoscyamus niger, Hyoscyamus First name should be "Hyoscyamus"	Agree
Kalium chloratum / Kalium muriaticum	ECHAMP	See 3 rd list: Kalium chloratum Ph.Eur. 0185	Agree \Rightarrow delete
Kieserite	AESGP	Naturally occurring mineral Kieserite (min 97.0 % $MgSO_4 \cdot x H_2O$) Formal correction	Not agree See the writing of chemical formulas in the Ph. Eur.
Luffa operculata	AESGP	Dried fruits of Luffa operculata (L.) Cogn. They contain minimum 1.0 per cent (m/m) of cucurbitacins (cucurbitacin D glucoside, cucurbitacin D, cucurbitacin B glucoside, cucurbitacin B, cucurbitacin E), calculated as cucurbitacin E ($C_{32}H_{44}O_8$; Mr 556,7), with reference to the dried herbal drug.	Not agree. If a reference to a Pharmacopoeial monograph is made, detailed description is not useful (harmonisation with the approved previous lists).
Magnesia sulfurica	AESGP	Magnesium sulfate heptahydrate $MgSO_4 \cdot x 7 H_2O$	Not agree See the writing of chemical formulas in the Ph. Eur.
Magnesia sulfurica	AESGP ECHAMP	Magnesia sulfurica / Magnesium sulfuricum The raw material Magnesium sulphate heptahydrate (acc. to Ph. Eur. 0044) is also the raw material for the homeopathic substance Magnesium sulfuricum, though the homeopathic preparation is not specified in the GHP. We ask to amend "Magnesium sulfuricum" as synonym, because this term is used in the GHP 1934 and in the KommissionD Monograph (please find both literature references attached).	Agree
Natrium nitricum / Natrum nitricum	AESGP	Sodium nitrate $NaNO_3$ containing minimum 99.0 and max 101.0 per cent of $NaNO_3$	Not agree. If a reference to a Pharmacopoeial monograph is made, detailed description is not useful (harmonisation with the approved previous lists).

Petroleum rectificatum / Petroleum rectificatum	AESGP ECHAMP	Petroleum , Petroleum rectificatum / Petroleum rectificatum GHP/FP Ph.Eur. 2683 (GHP) Petroleum boiling between 180 and 220°C obtained by rectification of crude oil / Petroleum boiling between 180 and 220°C	Partially agree Ph. Eur. ref: agree taking into account that the GHP monograph will be updated in order to comply with the new Ph. Eur. monograph (January 2016) Not agree: The synonym “petroleum” was considered by the sub-group as another stock (crude oil and not a fraction of crude oil) and therefore it was decided to delete this synonym.
Polygala senega, Senega / Senega, Polygala senega	ECHAMP	Polygala senega, Senega / Senega, Polygala senega Ph. Eur. 0202 (GHP/FP) Dried and usually fragmented root and root crown of Polygala senega L. or of certain other closely related species or of a mixture of these Polygala species / idem	Agree
Pulsatilla vulgaris	AESGP ECHAMP	Pulsatilla vulgaris / Pulsatilla GHP/FP Whole fresh flowering plants of Pulsatilla vulgaris Mill. / idem	Not agree Given the fact that the same name (Pulsatilla) is used for two different stocks (Pulsatilla vulgaris and Pulsatilla pratensis) and that little literature justifies the HU of this stock (comparatively to Pulsatilla pratensis considered in the literature as being the stock “Pulsatilla”), it was proposed to accept this stock with only the name “Pulsatilla vulgaris”.
Pulsatilla vulgaris	ECHAMP	Whole fresh flowering plants of Pulsatilla vulgaris Mill. (Anemone pulsatilla L.)	Agree for the second definition (FP)
Sambucus nigra	ECHAMP	Sambucus nigra, Sambucus GHP Please add the GHP synonym „Sambucus”	Agree
Sambucus nigra	ECHAMP	Sambucus nigra / Elder flower FP/Ph. Eur. 1217 Fresh flowering inflorescences of Sambucus nigra L. / Dried flowers of Sambucus nigra L.	Not agree Given that Sambucus nigra is mentioned in the homoeopathic parts of the German and French Pharmacopoeias, reference to the non-homeopathic part of the Ph. Eur. is not useful and not appropriate to define the stock of Sambucus nigra.
Schoenocaulon officinale, Sabadilla / Sabadilla, Sabadilla officinatum	AESGP ECHAMP	Dried ripe seeds of Schoenocaulon officinale (Cham. Et Schlechtend.) A. Gray ex Benth / Dried seeds of Schoenocaulon officinale A. Gray (Sabadilla officinarum Brandt et Ratzeb) We ask to include the description acc. to GHP literally.	Agree: update according to GHP, 11 th Supplement 2014

Semecarpus anacardium, Anacardium / Anacardium orientale	ECHAMP	Semecarpus anacardium, / Anacardium, / Anacardium orientale Dried fruit of Semecarpus anacardium L. (Anacardium orientale L.)	Agree
Spigelia anthelma, Spigelia / Spigelia	ECHAMP	Spigelia anthelmia, Spigelia / Spigelia anthelmia	Correction of typing error: agree
Symphytum officinale, Symphytum / Symphytum officinale	AESGP ECHAMP	Fresh underground parts of Symphytum officinale L., collected prior the to flowering / Fresh underground parts of Symphytum officinale L. See the description acc. to GHP literally.	Correction of typing error: agree
Urginea maritima, Scilla	AESGP ECHAMP	Fresh, fleshy fleshy scale leaves of the red-scaled subspecies of Urginea Urginea maritima (L.) Bak. sensu latiore [e.g. Urginea Urginea numidica (Jord. et Fourr.) Grey] with a clearly detectable scilliroside fraction We ask to include the description acc. to GHP literally and correct typing errors.	Agree According to GHP, 12 th Supplement 2015: Fresh, fleshy scale leaves of the red-scaled subspecies of Urginea maritima (L.) Baker s.l. [e.g. Urginea numidica (Jord. et Fourr.) Grey]
Urginea maritima, Scilla	AESGP	Fresh, fleshy scale leaves of the red-scaled subspecies of Urginea maritima (L.) Bak. sensu latiore [e.g. Urginea numidica (Jord. et Fourr.) Grey] with a clearly detectable scilliroside fraction containing 0,0005 – 0,0250 % scilliroside (C ₃₂ H ₄₄ O ₁₂ ; Mr 620,7), calculated as cumarine (C ₉ H ₆ O ₂ ; Mr 146,1) We ask to include the description acc. to GHP literally and correct typing errors.	Not agree. If a reference to a Pharmacopoeial monograph is made, detailed description is not useful (harmonisation with the approved previous lists).
Proposal of adding a new entry	AESGP	Scilla maritima Rootless, dried bulb of the red variety of Drimia maritima (L.) Stearn.	Currently, we do not have any literature to support homeopathic use of this kind of preparation
Vincetoxicum hirundinaria, Vincetoxicum	AESGP	Vincetoxicum hirundinaria, Vincetoxicum / Asclepias vincetoxicum, Vincetoxicum officinale GHP Fresh leaves of Vincetoxicum hirundinaria Medik. / Fresh underground organs of Vincetoxicum hirundinaria Medik.	Not agree. It concerns another plant part ⇒ another entry Currently, we do not have any literature to support homeopathic use of this kind of preparation
Zincum isovalerianicum, Zincum valerianicum	AESGP ECHAMP	Zinc isovalerate ZN Zn(C ₅ H ₉ O ₂) ₂ , 2H ₂ O	Correction of typing error: agree
Zincum isovalerianicum, Zincum valerianicum	AESGP	Zinc isovalerate Zn(C ₅ H ₉ O ₂) ₂ ·x 2H ₂ O containing minimum 98.0 and maximum 103.0 per cent of Zn(C ₅ H ₉ O ₂) ₂ ·x 2H ₂ O The description should be in accordance with the GHP, please adapt as suggested. Formal correction.	Not agree See the writing of chemical formulas in the Ph. Eur. If a reference to a Pharmacopoeial monograph is made, detailed description is not useful (harmonisation with the approved previous lists).