



The Allied Health Professions Council of South Africa

Ensuring quality complementary and alternative healthcare of choice

28 April 2010

Dear Practitioners of Homeopathy, Naturopathy and Phytotherapy,

UNPROFESSIONAL CONDUCT: USE OF INTRAVENOUS ETHYLENEDIAMINE TETRAACETIC ACID (CALCIUM DISODIUM VERSANTE [CaNa₂-EDTA]) AND ANY OTHER SCHEDULED INTRAVENOUS CHELATING AGENT; INTRAVENOUS PURE FORM OZONE (O₃) THERAPY; AND INTRAVENOUS DIHYDROGEN DIOXIDE (HYDROGEN PEROXIDE [H₂O₂]) THERAPY

Section 2(a) of the Allied Health Professions Act, Act 63 of 1982, read together with Chapter 3, Section 28 of Regulation 27, Government Notice R127, published on 12 February 2001, together with other applicable legislation, sets out the scopes of practice of practitioners of Homeopathy, Naturopathy and Phytotherapy.

In light of the existing scopes of practice for practitioners of homeopathy, naturopathy and phytotherapy, considered particularly with the legal implications of the Medicines and Related Substances Control Act, Act 101 of 1965, the Professional Board for Homeopathy, Naturopathy and Phytotherapy, after due consideration of all aspects relating to the matter, has deemed the use of:

- Intravenous ethylenediamine tetraacetic acid (calcium disodium versante [CaNa₂-EDTA]) and **any other** scheduled intravenous chelating agent as may be defined in terms of Section 22A(5) of the Medicines and Related Substances Control Act, Act 101 of 1965, prohibiting the sale, possession, control or use of those substances, unless identified in the Schedule thereto to the abovementioned practitioners for that purpose, including, but not limited to, Vitamin C, dimercaptosuccinic acid (DMSA), 2,3-dimercapto-1-propanesulfonic acid (DMPS) and alpha lipoic acid (ALA); and
- Intravenous pure form Ozone (O₃) therapy; and
- Intravenous Dihydrogen Dioxide (Hydrogen Peroxide [H₂O₂]) therapy,

to be **unprofessional conduct** for Homeopaths, Naturopaths and Phytotherapists, due to the fact that such substances and intravenous administration thereof to any patient fall outside of the legal scopes of practice and that the sale, possession, control or use of, for intravenous injection use, by such practitioners of such substances, is unlawful in the light of the provisions of the Medicines and Related Substances Control Act, Act 101 of 1965.

Physical address: 61 Rose Street, Riviera, Pretoria, 0084

Postal address: Private Bag X4, Queenswood, 0121

Tel: 012 329 4001 **Fax:** 012 329 2279

Email: registrar@ahpcs.co.za **Website:** www.ahpcs.co.za

The following activities are therefore strictly prohibited:

- Possession and control of any of the abovementioned substances for intravenous use;
- Prescription or supply of any of the abovementioned substances for intravenous use;
- Providing education or training in the administration of intravenous injections of any of the abovementioned substances to Homeopaths, Naturopaths or Phytotherapists, or students, or interns of any of these three professions.

Should the AHPCSA become aware of any practitioner in any one of the abovementioned professions engaging in any of the abovementioned prohibited activities, using any one of the abovementioned substances or being engaged in any other activity relating to the use of such substances or intravenous injection therapies thereof, such practitioner shall face disciplinary action in terms of Sections 23-30 of the Allied Health Professions Act 63 of 1982.

Yours faithfully,



DR LOUIS MULLINDER
REGISTRAR: AHPCSA

Physical address: 61 Rose Street, Riviera, Pretoria, 0084
Postal address: Private Bag X4, Queenswood, 0121
Tel: 012 329 4001 **Fax:** 012 329 2279
Email: registrar@ahpcs.co.za **Website:** www.ahpcs.co.za