



# The Indian Pharmaceutical Association (IPA)

*Platinum Jubilee Year*

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## MISSION

The Indian Pharmaceutical Association (IPA) is the national professional body of pharmacists engaged in various facets of the profession of pharmacy. The IPA is committed to promote the highest professional and ethical standards of pharmacy, focus the image of pharmacists as competent healthcare professionals, sensitize the community, government and others on vital professional issues and support pharmaceutical education and sciences in all aspects

**2014-2016**

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IPA/110/358

September 28, 2015

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Commissioner

Food and Drug Administration

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**Ref. F.No. 7-5/2015/Misc/091**

**Sub. Comments on the issue of sale of medicines over internet under the Drugs and Cosmetics Rules, 1955-Public comments invited-Regd.**

Sir,

Thank you very much for giving all stake holders an opportunity to place their suggestions/ comments in this important issue, but seven days notice is too short for developing an effective opinion on such a serious matter. However, we are providing our views in this matter-

On line Pharmacy suffers from the following deficiencies:

1. Increased risk of self-medication, misuse/abuse of medicines.
2. Contact of the pharmacist with the patient or care giver, and thus providing instructions to them on usage and care while taking their medications not fulfilled. Increased risk of non-compliance to therapy, often resulting in sub therapeutic effects, toxicity and even fatal effects.
3. Hard copy of prescription remains with the patient. The same can be uploaded to various online pharmacies to obtain the same medicines. In addition, the same can be produced at a licensed pharmacy to purchase the medicines. Refill instructions on controlled drugs can be passed in this manner.
4. In our country fake prescriptions can be created. Difficult for online pharmacies to detect fake prescriptions.
5. Risk of misinterpretation of handwriting
6. Can a scanned document (prescription) be produced in the court of law?
7. Couriering medicines may take few days and diverse temperatures, experienced by medicines, so storage during transit may affect medicine potency.

