

Shri J.P. Nadda
Honourable Union Minister of Health and Family Welfare
Department of Health and Family Welfare
Government of India
Room no. 348, "A" Wing, Nirman Bhavan
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The Hague, 9 January 2017
Ref.: GEN001392/CP/GSP/RvK

Subject: Professional management of community pharmacies by persons without the appropriate competence

Dear Minister,

The International Pharmaceutical Federation (FIP) is the global federation of national associations of pharmacists and pharmaceutical scientists. Through its 139 Member Organisations, FIP represents and serves more than three million pharmacy practitioners and scientists around the world – the experts in medicines and their responsible use. The Mission of FIP is to *“to improve global health by advancing Pharmaceutical Education, Pharmaceutical Sciences and Pharmaceutical Practice thus encouraging, promoting and enabling better discovery, development, access to and responsible use of appropriate, cost-effective, quality medicines worldwide”*. FIP was founded in 1912 and has been a non-governmental organization in official relations with the World Health Organization (WHO) since its creation in 1948.

We have recently learnt about a proposal submitted to your Ministry by the All India Organization of Chemists and Druggists (AIOCD), *“to conduct a short term refresher course for the unqualified persons to enable them work as pharmacists”*¹ and, as such, manage pharmacies (retail pharmacies or chemist and druggists shops).

We would like to bring to your attention two important definitions of pharmacists: Our organisation defines pharmacists as *“a scientifically-trained graduate healthcare professional who is an expert in all aspects of the supply and use of medicines. Pharmacists assure access to safe, cost-effective and quality medicines and their responsible use by individual patients and healthcare systems.”*

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¹ *“PCI firmly against AIOCD proposal to start refresher course for unqualified persons”*,
<http://www.pharmabiz.com/NewsDetails.aspx?aid=99147&sid=1>, 12 December 2016

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Similarly, the International Labour Organisation (ILO) has defined pharmacists² in its International Standard Classification of Occupations. *“Pharmacists store, preserve, compound and dispense medicinal products and counsel on the proper use and adverse effects of drugs and medicines following prescription issued by medical doctors and other health professionals. They contribute to researching, testing, preparing, prescribing and monitoring medicinal therapies for optimizing human health”*. ILO defines 13 major tasks for pharmacists, one of which refers to *“Supervising and coordinating the work of pharmacy technicians, pharmacy interns and pharmacy sales assistants”*

Our 2013 Global Report on Pharmacy Education³ revealed that the duration of pharmacy studies range from 4 years to 6 years. This duration is a requirement to ensure that graduating pharmacists have the skills, knowledge and attitudes to fulfil their roles and missions, including those defined in the *“Joint FIP/WHO guidelines on good pharmacy practice: standards for quality of pharmacy services”*.⁴

We therefore express our grave concern for the potential impact of this measure in terms of the quality and safe use of medicines and the public health of the Indian population, as it is unlikely that any refresher courses would allow unqualified personnel to acquire the necessary knowledge to take clinical decisions that a managing pharmacist must take when running a pharmacy or offering unsupervised professional advice to a patient. There is no doubt that all pharmacies of all types should be run under the professional guidance of a fully qualified and registered pharmacist.

We believe that all Indian citizens should be able to access to the same level of competencies and skills, thus of services when entering a pharmacy. The way forward is to ensure that there are sufficient, equally competent and well-distributed pharmacists across India. Such approach aligns with the United Nations High-Level Commission on Health Employment and Economic Growth recommendations (available at: <http://www.who.int/hrh/com-heeg/en/>).

We recognise the challenges that India may currently face with regards to unmet workforce needs, as the number of pharmacists becoming available each year in the country might not be getting deployed appropriately in pharmacies and in clinical practice to meet the country's healthcare needs. This represents an important challenge for the country, which demands policies aimed at creating opportunities in public and private sectors to appropriately recruit and deploy well-trained and qualified workforce to ensure a safe access to and a responsible use of medicines. Likewise, the enforcement of policies aimed at ensuring that pharmacies are adequately supervised by a pharmacist is also critical. Notwithstanding, the solution to these challenges must not be to allow persons without the appropriate competence to fulfil that role. This would establish a dangerous precedent, which would be difficult to redress in the future.

In November 2016, FIP organised a Global Conference on Pharmacy and Pharmaceutical Sciences Education, which led to the adoption of a vision for the development of

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² http://www.ilo.org/wcmsp5/groups/public/--dgreports/--dcomm/--publ/documents/publication/wcms_172572.pdf

³ http://www.fip.org/files/fip/FIPed_Global_Education_Report_2013.pdf

⁴ http://www.fip.org/www/uploads/database_file.php?id=331&table_id=



pharmacists' workforce and education together with 13 Pharmaceutical Workforce Development Goals and 55 statements defining the international expectations of a robust pharmaceutical education system to meet local needs (www.fip.org/nanjing2016).

Our Federation (through our Member Organisations, the Indian Pharmaceutical Association and the Indian Association of Colleges of Pharmacy) is keen to engage with your Ministry to develop a strategy based on these recommendations, best practices and evidence to prepare a sustainable pharmacists workforce to support the improvement of the health of all Indian people.

Should you have any further queries, please do not hesitate to contact us.

With kind regards,

A blue ink handwritten signature, appearing to be 'Carmen Peña', written in a cursive style.

Carmen Peña
FIP President

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CC:

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