



# The Indian Pharmaceutical Association (IPA)

(Society Regn No. Bom. 10 of 1960 GBBSD • Public Trust Regn. No. F- 746 (Bom) dt. 4.4.1960)

Kalina, Santacruz (East), Mumbai - 400 098. India • Tel.: +91 22 2667 1072 • Telefax : +91 22 2667 0744

E-mail : ipacentre@ipapharma.org • Website : <http://www.ipapharma.org>

## 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

**2016 - 2018**

### President

Rao V. S. V. Vadlamudi

IPA/110/22

April 15, 2017

### Immediate

### Past President

J. A. S. Giri

To

The Deputy Secretary (Drug Regulation),  
Ministry of Health and Family Welfare,  
Room No. 301 D, Nirman Bhavan,  
New Delhi 110 011

### Vice Presidents

### Divisional Heads

#### Community Pharmacy

Manjiri Gharat

E-mail: [epharma.drugs-mohfw@gov.in](mailto:epharma.drugs-mohfw@gov.in)

#### Education

T. V. Narayana

Ref.: X.11035/1010/2016-DRS MINISTRY OF HEALTH AND FAMILY WELFARE DEPARTMENT  
OF HEALTH AND FAMILY WELFARE, New Delhi, 16 March, 2017

#### Hospital Pharmacy

Ramesh Adepur

#### Industrial Pharmacy

Subhash Rijhwani

#### Regulatory Affairs

Subhash Mandal

**SUBJECT: PUBLIC CONSULTATION REGARDING REGULATION OF SALE OF DRUGS IN THE  
COUNTRY.**

Sir,

### Hon. Gen. Secretary

Kaushik Desai

Thank you very much for giving an opportunity to the stake holders to offer their suggestions. I on behalf of the Indian Pharmaceutical Association (IPA) would like to place the following points before you for consideration, which are as follows-

### Hon. Treasurer

Hemant Mondkar

### Editor - Pharma Times

Alka Mukne

### Editor - IJPS

Divakar Goli

1. The concept of forming an e-platform for regulation of sales of drugs is an ideal one, but before its implementation, present circumstances like socio economic conditions, infrastructure requirements should be considered.
2. We have already communicated our views on on-line pharmacy, stating that it would not be wise to allow on-line pharmacies at this moment due to several reasons as mentioned in our letter (copy enclosed for your ready reference).
3. Issues such as, huge numbers of FDCs, strip-cutting may need to be sorted out first, which are the main deterrents to this concept.
4. Issue of providing manpower and infrastructure by small retailers/whole-salers as well as MSMEs plea on barcoding to be resolved first.
5. The Govt. did not accept the proposal of adding dispensing fees by the pharmacists since it would cause escalation of medicines cost, but how another fees can be charged for this purpose. We feel it is in contradiction to earlier views of the Govt.

