



The Indian Pharmaceutical Association (IPA)

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

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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

2020 - 2022

IPA/110/563

February 28, 2022

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Subject: Objection/suggestion to the draft notification vide GSR No. 104 (E) dated 9th February 2022.

Sir,

The Indian Pharmaceutical Association (IPA) is an 80 year old association of pharmacy professionals in India (www.ipapharma.org) with members from across the nation operating through 22 state branches and more than 55 local branches. IPA is a non-profit making organization registered as a charitable trust with a constitution and functions on democratic principles. IPA's main objective is to position the pharmacist as one of the important healthcare professionals of India. As a member of the Drug Technical Advisory Board (DTAB), IPA is actively involved in advising the government on matters of drug regulation and those that are important to the pharmacy profession. IPA is affiliated to international associations like FIP, FAPA, CPA, AAPS, SEARPharm Forum and WHO for carrying out various collaborative professional activities, which include organizing training programmes for pharmacy professionals from academics, industry, regulatory and practice, making representation to the authorities on matters of professional interest and constantly working towards upgrading the standards of professional services offered by the pharmacists.

With reference to the draft notification vide GSR No. 104 (E) dated 9th February 2022, we would like to draw your kind notice that medical devices including invitro diagnostic is a specific category, which required special knowledge on medical devices including invitro diagnostic and related regulations. Pharmacists have relevant knowledge and training as is included in their course curriculum, but ordinary degree holder or an intermediate pass does not have related education and training. Moreover there is no dearth of Pharmacists in our country as presently more than 2 lakhs of Diploma and degree pharmacists are passing out each year. So, if this notification implemented it will have strong negative impact on public health.

Hence we appeal you to kindly delete the sub rule 3va and 3vc of Rule 87A of the draft Medical Device Rules 2022 published vide G.S.R. 104(E) dated 9th February 2022 to safeguard the health of masses.

Thanking you and with best regards.

Suresh Khanna
National Hon. Gen. Secretary