



ASSOCIATION OF MEDICAL CONSULTANTS, MUMBAI

Public Trust Act 1950 Regn. No. F-7373 Bom
Societies Regn. Act Xxlof 1860 Regn. No. Bom-454/81 GBBSD

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29th April 2017

To
Dr. Jayshree Mehta
President
Medical Council of India
New Delhi

Subject: The MCI Notification regarding use of generic name of drug and its implications.

Respected Madam,

We write to you on behalf of the Association of Medical Consultants (AMC), Mumbai.

We are an Association of over 9500 Consultant doctors of all Specialties and Super Specialties of Medicine practicing in Mumbai, Thane, Navi Mumbai, Raigad district. We also represent nearly 1500 Nursing homes and hospitals of these areas. In addition, we have Affiliate AMC Units in following cities in Maharashtra viz. Kolhapur, Ratnagiri and Sindhudurg. We also have Affiliate AMC Units in Mangalore and, Bangalore. and Delhi NCR. This year we have formed FAMCI- Federation of AMC of India

Our Association has been in the forefront in furthering the cause of a better healthcare delivery system and have been part of the discussions in drafting of various Governmental legislations and Guidelines in the past e.g. Clinical Establishment Act (Maharashtra State), Prevention of Violence against Medicare Personnel, Accreditation of Nursing Homes and Hospitals, etc. Our Association exhorts its members to practice ethical and rational Medicine and conducts Seminars which sensitise them to do this.

We have noted the commendable initiative of the Health Ministry & the Government of India towards promoting the use of generic drugs in the interest of affordable Healthcare. Our Association is committed to this cause and welcomes the guidelines laid down in your notice in this connection dated 21 April 2017

We have discussed at length the various aspects of this issue in our Managing Committee in a meeting held on 26th April 2016. Inputs were sought from all our MC members

While the majority of our members welcomed this initiative of the government, certain serious concerns were expressed as far as implementation of the guidelines is concerned.



Association With a Mission and Commitment





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We wish to bring to your notice our considered viewpoint and reservations on the issue.

1) While prices of drugs should be lowered thus making them affordable, the quality of these drugs should also be good because treatment outcomes depend on predictable efficacy of drugs. However, it is a fact strict manufacturing norms and subsequent Quality Assurance checks are conspicuous by their absence in our country. We understand that not all of generic drugs in India undergo quality checks. Stringent quality control and serious periodical monitoring of the quality of the generic drugs is not in place most of the time. Hence we would be more than happy to prescribe generic drugs to patients provided laws, regulations and measures are framed by the government to ensure that their bioequivalence, quality assurance and manufacturing norms are the same as for branded drugs so that doctors have confidence in their efficacy.

Thus it should be first ensured that these mechanisms are available and only then doctors should be instructed to prescribe generic drugs.

2) In the absence of this not only the patients lives will be put at risk, doctors themselves will feel at risk because unpredictable results of the drugs and even worse the adverse effects may be attributed to negligence of the Physician and it may be difficult to establish the truth.

3) The authority to dispense medicines would shift from doctors to chemists and their employees who more often than not are unqualified, what with the serious shortage of qualified pharmacists in India. In other words the patient will be left to the mercy of the unqualified chemists who may sell to the patient the brand of his choice

4) We agree that Doctor / Pharma nexus should be broken and this has the full support of our Association. However the present protocol will in fact create a Pharma / Chemist nexus and make the situation worse. Appropriate infrastructure must first be put in place before making these changes.

5) If it is made mandatory to prescribe only generic drugs, it will make it almost impossible to write each and every ingredient of fixed drug combinations. This will result in a lot of confusion at the level of the patient as well as the chemist and further aggravate the situation.

In view of the above, Association of Medical Consultants requests you to review your notification to doctors in connection with prescription of generic drugs or else the remedy for reducing cost of drugs may prove to be worse than the disease.

Thanking you

Dr. Smita Sharma
President

Dr. Vivek Dwivedi
Hon. Secretary



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