



**Pakistan
Pharmacists
Association (Centre)**

Founder member of the Federation of Asian
Pharmaceutical Association (FAPA)

Member of Federation of International
Pharmaceutique (FIP)

Member Commonwealth Pharmaceutical
Association (CPA)

PPA HOUSE: 488-G, JOHAR TOWN, LAHORE PAKISTAN.

Ph. Mob: 0300-8403646, 0300-8400072 Fax: 92-42-5167260

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Dated: 10th June, 2010

Mr. Khushnood Akhtar Lashari,
Federal Secretary Health,
C-Block, Pak Secretariat,
Islamabad.

Subject: Unjustified and unlawful amendments in the recruitment Rules for different posts in Drug Control Administration in Ministry of Health, Islamabad.

Dear Sir,

Please refer to our previous letters on the subject noted above.

1. Pakistan Pharmacists Association (PPA) is a registered representative body of Pharmacists of the country established under Pharmacy Act, 1967. PPA is working for the uplift of Pharmacy profession and also providing assistance to the Government in improving the health care system in Pakistan. Pharmacist is an integral part of health delivery system without which, health for all could not be achieved, therefore, profession of Pharmacy worldwide is considered as a Life Saving Profession and Pharmacist as pillar of the health providers.

2. Drugs Act 1976 was promulgated in 1976 and under section 17 of this Act, Federal Inspector of Drugs can only be appointed having prescribed qualifications. The Federal Drugs Inspectors, Federal Drugs Laboratory and Federal Government Analysts Rules 1976 have clarified the qualifications vide Rules No. 3 Qualification of Federal Inspectors as a person having degree in Pharmacy. The Federal Government vide SRO 903 (1)96 dated 19th September, 1996 notified the qualifications for the appointment, promotion and transfer as following:-



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BY INITIAL APPOINTMENT

	<u>Post</u>	<u>Qualifications</u>
i.	Drug Controller (BPS-20)	Degree in Pharmacy
ii.	Chairman Quality Control/ Deputy Director General Health (E&M), Director Central Drugs Laboratories (BPS-19).	Degree in Pharmacy
iii.	Federal Inspector of Drugs/ Deputy Drugs Controller/ Assistant Director General Health (E&M) (BPS-18),	Degree in Pharmacy
iv.	Assistant Drugs Controller/ Vice Chairman Quality Controller/ Assistant Director Central Drugs Laboratories (BPS 17).	Degree in Pharmacy

APPOINTMENT BY TRANSFER

i.	Drug Controller (BPS-20)	Master's Degree in Pharmacy / M.Phil in Pharmacy
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|------|--|---|
| ii. | Chairman Quality Control/
Deputy Director General | Master's Degree in
Pharmacy / |
| | Health (E&M), Director Central
Drugs Laboratories (BPS-19). | M.Phil in Pharmacy |
| iii. | Federal Inspector of Drugs /
Deputy Drugs Controller / | Master's Degree in
Pharmacy / M.Phil |
| | Assistant Director General
Health (E&M) (BPS-18), | in Pharmacy |
| iv. | Assistant Drugs Controller/
Vice Chairman Quality | Bachelors Degree in
Pharmacy |
| | Controller/ Assistant Director
Central Drugs Laboratories (BPS 17). | |

3. It is submitted that the Ministry of Health, Islamabad made unjustified and unlawful amendments in the above Recruitment Rules in year 2007 in Drug Control Administration by changing the basic required qualifications for Drug Controller, Chairman Quality Control, Federal Inspector of Drugs and Assistant Drug Controller just to protect the illegal appointment of a chemist as Drug Controller (Registration) in the Ministry of Health, Islamabad in December, 2006, by putting together following qualifications which are no way similar to each other and has no connection with medicines / pharmacy / pharmaceuticals and do not meet the requirement of the job, which are as under:-

Amended Qualifications

Condition for promotion

Basic Degree in Pharmacy / M.Sc. Chemistry / Pharmacology / Microbiology /
Biotechnology.



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By Transfer

Ph.D. in Pharmacy / M.Sc. Chemistry/ Pharmacology / Microbiology /
Biotechnology.

4. That irrational act of Ministry of Health created a great unrest among the Pharmacist's Community in general and the Pharmacy students of almost 30 Pharmacy Institutions / Universities imparting Pharmacy Education of Pakistan in General. These amendments are entirely in contradictions to provision of the Drugs Act 1976 and Rules framed thereunder and the global scenario of Drug Control

Administration as well as the WHO guidelines. Report of World Health Organization (WHO) Role of Pharmacist in Health Care system convened in New Delhi December, 1996 has clearly identified the vital role of a pharmacist having as specialized knowledge of management, drug delivery, drug dispensing and production of medicines in an increasingly sophisticated health care environment. The role of a pharmacist has broadened to embrace the administrative as well as the practical aspects of health care delivery. Pharmacist has been declared integral part of health care team.

5. The Pharmacist becomes indispensable because they alone understand the principals of quality assurance, they are familiar to the pricing structure, they are custodian of much technical information on medicines, they are able to provide information / advice to the patients and they provide an interface between the duties of prescribing and selling medicines. The competence of a pharmacist is already proven and evident in the direction and administration of pharmaceutical services, in the drug registration, Drug control, in the formulation and quality control of pharmaceutical products, in the inspection and assessment of drug manufacturing facilities etc. etc.

6. On one hand the government has made efforts to improve the pharmacy curriculum and has upgraded it to five years Doctor of Pharmacy Degree (Pharm. D.) which is now being taught by all universities of Pakistan. A pharmacy student during his five years study almost THIRTY FIVE different subjects relating to medicines its action, its production, its quality assurance, its quality control, its clinical use, its origin / synthesis from traditional medicines, its pharmaceutical chemistry and simultaneously undergoes related practical trainings.



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7. Pharmacy is an established profession and recognized as a practicing subject throughout the world like doctors, engineers etc. For all the jobs including senior level in medical or engineering profession basic qualification requirement is degree in medicine or engineering. It is, therefore, requested that for Pharmacy related jobs basic the requirement should be degree in Pharmacy with required experience be made mandatory and looking for Ph.D. in Pharmacy for any of these posts is not justified.

8. The subject amendments made by Ministry of Health at the time of making amendments showed highly non-serious attitude towards the drug related, assuring the health of our countrymen and health for all issues. We completely failed to understand the justification of the concerned officials of the ministry who proposed the Pharmacy studies / qualifications as equal to that of Chemistry, Microbiology, Pharmacology or Biotechnology who had never studied any of the specific drug related subjects like that included in the Pharmacy curriculum. Changing of the qualifications on highly responsible positions is great mockery and movement back to the planet of Apes.

9. It may also be pointed out here that if someone thinks that the qualification of the Pharmacist, chemist, microbiologist, pharmacologist or biotechnologists are same, than we may also request them that where ever these person are appointed as lecturer or on any other post, Pharmacist with degree in Pharmacy may also be made eligible and be appointed as lecturer in chemistry or microbiology etc. In fact with those changes in the qualifications for highly technical positions, an efforts was made to put the government functioning just 33 years back from where we started in 1976 after the promulgation of the Drugs Act 1976 and to degrade the highly skilled and sophisticated profession which is recognized as life saving profession throughout the world on the basis of pharmacists being expert in patient care, ensuring the availability of safe, effective drugs at affordable prices.

10. We would also like to point out the reason at the backdrop of changing these qualifications by the Ministry of Health i.e. illegal appointments was made in the Drug Control Administration, against the existing qualifications for the Appointment, Promotion and Transfer Rules issued vide SRO 903 (1)96 dated 19th September, 1996. It is exactly the same as for one wrong doing one keeps on doing many wrong things, without taking into consideration that the whole structure of the Ministry may change illogically.



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11. It is very humbly requested to please interfere directly to save the profession of Pharmacy in the country and to reduce unrest among the pharmacist's community and the Pharmacy students of the country who feels that in the presence of these amendments their future in the country is being made dark, therefore, these illegal, unlawful and unjustified amendments made in the recruitment, appointment and promotion rules may please be reverted immediately.

Thanking you in anticipation and looking forward for a favorable response.

Sincerely,

SYED KHALID SAEED BUKHARI,

President,

Pakistan Pharmacist Association,

488 G, Johar Town,

Lahore, Pakistan.

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