



THE ALL INDIA ORGANISATION OF CHEMISTS & DRUGGISTS®

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PRESS NOTE

Dated 01-04-2026

AIOCD Submits Consolidated Representation on 93rd DTAB Meeting Agenda

The All India Organisation of Chemists and Druggists (AIOCD) has submitted a consolidated representation to the Chairman and Secretary of the Drug Technical Advisory Board (DTAB) regarding key agenda items (2, 5, 7, 9, and 12) discussed in the 93rd DTAB meeting held on 16th February 2026.

"AIOCD President J. S. Shinde and General Secretary Rajiv Singhal reaffirmed their commitment to public health, the rational use of medicines, and the protection of the regulated drug distribution system. They also expressed serious concern over the growing menace of illegal and unregulated e-pharmacies, which pose significant risks to patient safety and undermine licensed brick-and-mortar chemists."

Key Highlights of AIOCD's Representation:

Agenda 2 (Good Distribution Practices – GDP):

AIOCD has welcomed the proposal, subject to phased and practical implementation after taking all stakeholders into confidence and ensuring no undue burden on small and medium traders.

Agenda 5 (Advertisement of Schedule H, H1 & X Drugs):

Strong opposition has been raised, citing risks of self-medication, misuse, and commercialization of prescription drugs. AIOCD has urged continuation of the existing prohibition without dilution.

Agenda 7 (Amendment in Rule 64 – Competent Person):

The proposed changes have been opposed as impractical and burdensome, especially for MSME wholesalers, with potential disruption to the supply chain.

Agenda 9 (Schedule K Exemption for Nicotine Gum 2 mg):

AIOCD has strongly objected due to the addictive nature of nicotine and risks of misuse, recommending that such products remain under licensed chemist supervision.

Agenda 12 (Stocking of Homoeopathic Medicines):

The proposal has been welcomed, with suggestions for maintaining proper records and avoiding additional compliance burden. However, AIOCD has cautioned against misuse by illegal e-pharmacies.

Serious Concern:

AIOCD has reiterated the urgent need for strict enforcement against illegal e-pharmacies operating without valid licenses. It has also urged the immediate withdrawal of draft provisions such as GSR 817 and GSR 220, citing regulatory ambiguity and misuse.

AIOCD has requested DTAB to reject proposals under Agenda 5, 7, and 9, implement Agenda 2 with stakeholder consultation and expedite Agenda 12 in a balanced manner. The organisation emphasized that public health and regulated drug distribution must remain paramount.



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March 30, 2026

Ref : DTAB/AIOCD/403/2026

To,

The Chairman and secretary

Drug technical Advisory Board (DTAB)

New Delhi

Subject: Consolidated Representation of AIOCD on 93rd DTAB meeting Agenda and proposals under items number 2,5,7,9,12. Our suggestions, objections to safeguarding Public Health and appropriate Regulation for wholesale and retail trade.

Reference: 93rd DTAB meeting dated 16/02/2026 proposals

Respected Sir,

We, on behalf of the All-India Organisation of Chemists and Druggists (AIOCD), at the outset reiterates its unwavering commitment to public health, rational use of medicines and the protection of the regulated drug distribution system through licensed brick-and-mortar chemists. We also wish to bring to your kind attention the growing concern regarding illegal and unregulated e-pharmacies which are undermining the existing regulatory framework and posing serious risks to patient safety. There is need to address this menace urgently. This is consolidated representation of our suggestions and objections on the proposals deliberated in agenda in the recent DTAB meeting.

1. Agenda No. 2 – Good Distribution Practices (GDP)

AIOCD welcomes the proposal to incorporate Good Distribution Practices (GDP) guidelines finalised by the DTAB under the Drugs Rules, 1945 and grant legal sanctity to it. This is a progressive step towards ensuring quality, safety, and integrity in the pharmaceutical supply chain in line with international regulation.

Suggestions:

Implementation of said guideline should be phase wise and practical, allowing adequate transition time and small and medium traders should not face disproportionate compliance burden.

2. Agenda No. 5 – Advertisement of Schedule H, H1 & X Drugs

AIOCD strongly opposes the proposal permitting advertisement of prescription drugs even with prior approval.

Key Concerns:

- Violates the core principle of prescription-only medicines.
- Encourages self-medication, misuse, and irrational drug use.
- Monitoring digital and indirect advertisements is impractical.
- Leads to commercialisation of medicines at the cost of ethics and public health.

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Submission and suggestion:

The existing prohibition must be continued without dilution.

3. Agenda No. 7 – Amendment in Rule 64 (Competent Person Qualification)

AIOCD strongly opposes the proposed amendment.

Key Concerns:

- Wholesale trade is strictly B2B distribution no direct impact on patient.
- Proposed qualifications are excessive and impractical.
- Will impose heavy compliance burden on MSME wholesalers.
- May cause supply chain disruptions, especially in rural areas.

Suggestions:

- continue present regulation. which is already proved effective.

4. Agenda No. 9 – Schedule K Exemption for Nicotine Gum (2 mg)

AIOCD strongly and categorically opposes this proposal.

Key Concerns:

- Nicotine is an addictive substance with risk of misuse.
- Safeguards like age restriction and monitoring are not practically enforceable.
- May bypass licensed chemists, weakening the regulated system.
- Contradicts broader public health and tobacco control objectives.

Suggestions:

- Restrict sale only through licensed chemists, exemption of retail license under Schedule K is not warranted.

5. Agenda No. 12 – Stocking of Homoeopathic Medicines by Allopathic Wholesalers

AIOCD welcomes this progressive proposal.

Suggestions:

- It will be helpful to maintain proper records and traceability.
- Avoid additional compliance burden.
- Ensure uniform implementation across states.

Serious Concern:

Several illegal E-Pharmacies who are operating without licenses required under Drugs and cosmetics Act and against order of High courts, will further misuse this exemption. There will be uncontrolled sale of such drugs. There are many Homoeopathic drug which are poisonous if consumed indiscriminately. It is undermining the licensed brick-and-mortar chemist network and compromising patient safety.

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Our strong suggestion:

Immediate and strict stern enforcement action against illegal e-pharmacies is anticipated since long. As submitted on and often before this we again strongly urge that draft e-pharmacy GSR 817 and covid period door delivery GSR 220 be withdrawn immediately in the interest of public health, and regulatory clarity. AIOCD respectfully submits that, public health must remain the paramount consideration. Drug distribution must continue through regulated and licensed channels only. Any policy leading to misuse, regulatory dilution or trade imbalance must be reconsidered.

6. In view of this we therefore request your good office:

- Reject proposals under Agenda No. 5, 7, and 9 and implement Agenda No. 2 and 12.

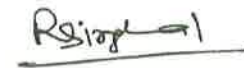
We trust that our concerns will receive your kind and serious consideration in the larger public interest the public health and fair-trade practices.

With highest regards,

For The All India Organisation of Chemists and Druggists (AIOCD)



(J. S. Shinde)
President



(Rajiv Singhal)
Hon Gen. Secretary

Encl : Above mention Agenda copy

AGENDA NO. 2

Consideration of the proposal regarding guidelines on Good Distribution Practices for pharmaceutical products

The Board was apprised about the agenda as well as about the recommendations of 66th DCC meeting held on 17.06.2025.

DTAB after deliberation suggested certain minor corrections in the guidance document and agreed to appropriately amend the Drugs Rules, 1945 for imparting legal sanctity to the suggested guidelines for all the firms holding license to manufacture for sale, sell, stock, exhibit or offer for sale or for distribution of drugs.

AGENDA NO. 5

Consideration of the proposal for amendment in rules under Chapter VI Sales of Drugs other than Homeopathic medicines w.r.t. advertisement

The Board was apprised about the proposal as well as about the 67th DCC dated 17.11.2025 recommendations. DTAB after deliberation recommended that suitable provisions may be made in the Drugs Rules, 1945 that no advertisement of drugs specified in Schedule H, H1 and X shall be made except with the previous sanction of Central Government for firms holding licence to sell, stock or exhibit or offer for sale or distribute.

AGENDA NO. 7

Consideration of the proposal to amend rule 64 of the Drugs Rules, 1945 in respect of qualification of the competent person

The Board was apprised about the agenda to amend rule 64 of the Drugs Rules, 1945 in respect of qualification of the competent person. DTAB re-deliberated the proposal in detail and recommended that qualification of competent person may be a registered pharmacist or a degree in Science with two years experience in dealing of drugs including six months online certificate course recognized by PCI, NIPER, Skill Development Council etc for the purpose.

The Board noted that the matter was also discussed earlier in 70th DTAB meeting dated 18.08.2015 and 91st DTAB meeting dated 14.08.2024.

Accordingly, the rules may be amended suitably for qualification of competent person under rule 64 of Drugs Rules, 1945.

AGENDA NO. 12

Consideration of the proposal to amend entry number 31 of Schedule K relating to homoeopathic medicines so as to allow allopathy drugs wholesale dealers to keep homoeopathic medicines for maintaining the supply chain of homoeopathic medicines in allopathic retail stores

The Board was apprised about the proposal. As recommended by DTAB in its 90th meeting dated 25.01.2024, the Board was also apprised about the recommendations of the Ayurvedic, Siddha, Unani Drug Technical Advisory Board (ASUDTAB) meeting held on 25.5.2023. DTAB deliberated the matter in detail and agreed with the proposal to extend the exemption provided under Schedule K to wholesale drugs licence under Rule 61.

AGENDA NO. 9

Deliberation of the proposal to amend entry no.33 of Schedule K exemption from the provision of sale license

The Board was apprised about the proposal. Board was also apprised about the ICMR as well as Tobacco Control Division (TCD) recommendations in the matter.

DTAB after deliberation recommended that entry no. 33 of Schedule K shall be amended to include only unflavored Nicotine gums 2 mg with the following conditions:

- (a) permission should be limited to unflavored gums (2 mg) and not extended to any other form of NRT.
- (b) sale to minors must be strictly prohibited and online accessibility to be closely monitored.
- (c) post-marketing surveillance should be conducted to monitor and report any adverse effect.
- (d) Marketing of NRT by the tobacco industry may be restricted due to the significant conflict of interest.

Further, DTAB recommended that Nicotine lozenges 2 mg shall be excluded from Schedule K exemptions.