



THE ALL INDIA ORGANISATION OF CHEMISTS & DRUGGISTS[®]

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April 7, 2026

Ref : DCC/AIOCD/405/2026

To,

Dr. Rajeev Ji Singh Raghuvanshi

Drugs Controller General (India)

Central Drugs Standard Control Organisation (CDSCO)

FDA Bhawan, Kotla Road

New Delhi – 110002

Subject: Concerns and Suggestions on Proposal for Dispensing Exact Prescription Quantities of Strip-Packed Medicines

Respected Sir,

With reference to the proposal placed before the DCC regarding dispensing of exact prescription quantities (cut/loose strips), we wish to submit the following observations and concerns on behalf of the chemist fraternity.

At the outset, we would like to state that pharmacists and chemists across the country are fully committed to patient welfare and affordability. We understand the concern that patients should not be compelled to purchase medicines in excess of their prescribed requirement. However, while supporting the intent of the proposal, certain practical and regulatory challenges need to be carefully addressed.

- 1. Impact on Dispensation from Pharmacies:** This may lead to operational, legal, and inventory management challenges at the retail level.
- 2. Risk of Wastage of medicines that is national loss and financial losses to the retailers:**
 - Dispensing loose tablets will inevitably result in unsold partial strips, which cannot be reused efficiently.
 - These cut strips cannot be returned to stockists or manufacturers, leading to direct financial loss for chemists.
 - Given that medicine prices and margins are already fixed by the Government, retailers operate on very limited margins and cannot absorb such losses.
- 3. Consultation with stakeholders: -**

To the best of our knowledge, such a significant operational change has not been discussed in detail with trade bodies like the AIOCD prior to this proposal.

Since chemists are the primary stakeholders responsible for implementation, it is essential that:

- Trade bodies are taken into confidence
- Practical ground-level challenges are incorporated into policy decisions

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4. Issue of Batch Number & Expiry Visibility: One of the most critical concerns is related to drug safety and traceability:

- Cutting strips often results in loss of batch number and expiry date visibility
- This creates serious issues in:
 - Patient safety
 - Drug recall situations
 - Complaint redressal
- It also exposes chemists to legal and regulatory risks

Additionally:

- Patients must have access to batch and expiry details
- Retaining unidentified loose tablets at the pharmacy is not compliant with good dispensing practices.

5. Inventory & Return Challenges

- Cut strips cannot be taken back by distributors or companies
- Pharmacies cannot maintain unidentifiable or incomplete stock
- There is currently no reverse supply chain mechanism for such partially used strips.

6. Suggestions & Way Forward

While supporting patient interest, we request that the following measures be considered before implementing any such rule:

1. Manufacturer-Level Intervention

- Pharmaceutical companies should produce variable pack sizes aligned with common prescription durations.

2. Mandatory Printing on Each Tablet/Blister

- Ensure batch number and expiry date are printed more than one place one unit/blister segment

3. Return Policy for Cut Strips

- Companies/distributors should establish a mechanism to accept and compensate for unsold partial strips

4. Revision of Trade Margins

- Government may consider increasing minimum margins to offset operational losses arising from such practices

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5. Clear Legal & Operational Guidelines

- Standard Operating Procedures (SOPs) must be issued to ensure:
 - Proper labelling
 - Traceability
 - Accountability
- **Optional / Voluntary Dispensing**
- Chemists can't not give medicine Suo Moto must be allowed to dispense loose quantities where feasible, rather than making it mandatory.

Conclusion:

While the intent to reduce patient burden is appreciated, the proposed measure in its current form may lead to operational difficulties, financial losses, and potential risks to drug safety and traceability.


We respectfully request that the above concerns be duly considered and that any policy decision be implemented only after detailed discussion with stakeholders, including trade bodies like AIOCD.

We assure our full cooperation in developing a balanced, practical, and patient-friendly solution.

With regards,

For The All India Organisation of Chemists and Druggists


(J. S. Shinde)
President


(Rajiv Singhal)
Gen Secretary