

ASSOCIATION OF REGULATORY AFFAIRS PROFESSIONALS

Registered under the Societies Registration Act XXI of 1860 Regn. No. S-E/1068
Quality Council of India (QCI) Membership No.-CORP/AT/5036

Ref-ARAP/RR-CDSCO/2017

Dated-10th May 2017

To,
The Deputy Secretary,
Government of India
Room No. 301-D, D Wing
Nirman Bhawan
New Delhi-110001

Sub: Requirement rules for appointment of Assistant Drugs Control Officer, Drugs Control Officer, Assistant Drugs Controller (India), Deputy Drugs Controller (India) and Joint Drugs Controller (India) reg.

Dear Sir,

Let me take this opportunity to introduce our organization, Association of Regulatory Affairs Professionals (ARAP), which is a first regulatory affairs professionals society registered under the societies registration act XXI of 1860, with an objective of to promote the Science, Pharmacy, Healthcare and research in all facet and to hold symposium, conference, workshop and exhibitions for regulatory update & promoting the scope of profession of Regulatory affairs in Science, Biotechnology, Agriculture, Pharmacy ,Healthcare, Research and development.

This is to draw your kind attention that as published requirement rules schedule for post of Assistant Drugs Control Officer and Drugs Control Officer age and qualifications are almost same whereas it should be in line with current academic resources availability and interest.

Course	Degree in Pharmacy	Pharm D	Remarks
Syllabus	As per Pharmacy council of India designed for four years	As per Pharmacy council of India designed for six years	Pharm D course syllabus has different from Degree in pharmacy course thus we should not consider both courses as equivalent qualification for ADCO and DCO post.
Duration	Four years / Eight semester	Six years	As per Pharmacy council of India Pharm D course has two category Type i- Pharm D Type ii- Pharm D (Post Baccalaureate) Beside that Pharm D course syllabus has more focused on clinical part of pharmacy.

ASSOCIATION OF REGULATORY AFFAIRS PROFESSIONALS

Registered under the Societies Registration Act XXI of 1860 Regn. No. S-E/1068
Quality Council of India (QCI) Membership No.-CORP/AT/5036

We strongly believe that degree in pharmacy or pharmaceutical sciences should not be equivalent to Pharm D course for post of 'Assistant Drugs Control Officer' or Drugs Control Officer and age should be 35 years as in line with all state drugs inspectors.

Moreover, we have not seen any individual's with degree in Medicine with specialisation in Clinical Pharmacology or Microbiology working as Drugs control officer or Drugs Inspector in Central Government or any state Government or even applied for this post.

As stated in Rule 49 of Drugs and Cosmetics Rules 1945 **Qualifications of Inspectors**- *A person who is appointed an inspector under the Act shall be a person who has a Degree in Pharmacy or Pharmaceutical Sciences or Medicine with specialisation in Clinical Pharmacology or Microbiology from a University established in India by law.*

Since Drugs and Cosmetics Rules 1945 have finalized on the academic resource available in 20th century with shortage of degree in pharmacy persons. Now we are in 21st century with well developed pharmacy educational college and university across India and thousands of pharmacy graduate passed every year.

Therefore, we would request to delete the proposed qualification 'degree in Medicine with specialisation in Clinical Pharmacology or Microbiology' for the post of **Assistant Drugs Control Officer** and **Drugs Control Officer**.

Name of the post	Proposed Age	Proposed Qualification	ARAP recommendation	Remarks
Assistant Drugs Control Officer	Not exceeding 30 years	Degree in Pharmacy or Pharmaceutical Sciences or Medicine with specialisation in Clinical Pharmacology or Microbiology OR Pharm D from a recognised University/Institute.	Age: Not exceeding 35 years Qualification: Degree in Pharmacy or Pharmaceutical Sciences from a recognised University/Institute.	Since it is Group 'B' post formed after long time by central government so age should be as Max. 35 years to give more opportunity to persons to apply for this post.
Drugs Control Officer.	Not exceeding 30 years	Master Degree in Pharmacy or Pharmaceutical Sciences or Degree in Medicine with specialisation in Clinical Pharmacology or Microbiology OR Pharm D from a recognised University/Institute.	Age: Not exceeding 35 years Qualification: Degree in Pharmacy or Pharmaceutical Sciences from a recognised University/Institute.	There are provisions for appointing the Drugs inspector as per Rule 49 of Drugs and cosmetics Rules. Degree in pharmacy or pharmaceutical sciences has already mentioned in qualification of inspectors.

ASSOCIATION OF REGULATORY AFFAIRS PROFESSIONALS

Registered under the Societies Registration Act XXI of 1860 Regn. No. S-E/1068
Quality Council of India (QCI) Membership No.-CORP/AT/5036

				Master degree in pharmacy or Pharmaceutical Sciences is not in consonance with Rule 49(A) and 50(A) of the Drugs and Cosmetics Rule 1945 also.
--	--	--	--	--

This is to draw your kind attention that all states of India generally consider age limit 18-40 years for the post of Drugs inspector under Rule 49 of Drugs and cosmetics Rules 1945.

We strongly believe that post graduate degree in pharmacy or pharmaceutical sciences should not be consider as an essential qualification for the post of 'Drugs Control Officer' and age should be 35 years as in line with all state drugs inspectors.

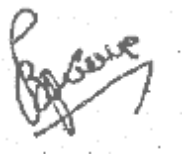
Recently in February 2017 Madhya Pradesh has recruit the Drugs inspector with age limit 18 to 40 years.

We also recommended for 20% of total post by direct recruitment for post of Assistant Drugs controller (India) with the qualification as Master Degree in pharmacy or pharmaceutical science from a recognised university/institute.

Hope you will consider this for the sake of pharmacy profession

With best regards,

Your's sincerely



Dr. S.B.Puranik
(President)