



## AMERICAN CHAMBER OF COMMERCE IN INDIA

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12<sup>th</sup> October, 2015

Dr. V K Subburaj  
Secretary, Department of Pharmaceuticals  
Ministry of Chemicals and Fertilizers  
Government of India  
Shastri Bhawan  
New Delhi

### **Subject: Uniform Code for Pharmaceutical Marketing Practices (UCPMP)**

Kindly refer to the notice dated 28<sup>th</sup> September, 2015 regarding extension of the deadline for voluntary implementation of UCPMP by Pharma companies. AmCham members of the Medical Devices committee supports the initiative to have a uniform code for pharmaceutical marketing practices (UCPMP) and feels that UCPMP code meant for medical devices, will certainly bring positive results and discipline. However, AmCham recommends that the code should be redesigned to suit medical device industry by reviewing it in light of the unique features of the Medical Technology as follows:

- Medical Devices have a short product life cycle (18 to 24 months) – Frequently upgraded versions.
- Medical Devices are based on mechanical, electrical and materials engineering
- Medical Devices consists of extremely diverse group of products involving a number of components. Failure occurs due to mechanical faults, electrical component failure, biocompatibility issues, fatigue. User error is more likely to be a cause.
- Medical device sector thrives on innovation and cutting edge technologies, therefore the sector should have continuous up-gradation in knowledge, skills and technology.
- The Medical device industry needs to closely work with specialist doctors and deploy trained technical support for techniques like implanting of devices, diagnosis of the right patients and post implant medical care.
- Most of the activities conducted by Medical Device companies, like procedure training, observing difficult implant cases, regular skill up-gradation of trained physicians and awareness about chronic diseases are getting affected due to certain provisions in UCPMP.

Medical Devices emerge from an extremely inter disciplinary, technology intensive and evolved product development cycle. Training and skill upgradation of healthcare

practitioners, Doctors, Surgeons is extremely important for the safe and efficient usage of Medical Devices.

AmCham members of the medical devices committee would like to extend their full support to the Department of Pharmaceuticals in development of a uniform code suited to medical devices industry. **I shall be grateful if you could kindly grant an audience to AmCham members on any date and time suiting your convenience during the week beginning October 26, 2015 for discussion on the need to have a separate code of marketing practices for medical devices.**

Yours Sincerely,

A handwritten signature in blue ink, appearing to be 'Prabal Chakraborty', written in a cursive style.

(Prabal Chakraborty)

Chairman

AmCham Medical Devices Committee