TRANSPARENCY INTERNATIONAL - PAKISTAN

Plot 72-F/2, 1st Floor, 9th Street, Jami Commercial,
Phase VII, Defence Housing Authority, Karachi
Phone: +92-21-35390408, 35311898
Fax: +92-21-35390410
Email: ti.pakistan@transparency.org.pk
Website: www.transparency.org.pk

August 11, 2025

TL25/0811/4A

Syed Murad Ali Shah,
Chief Minister Sindh
CM House, Karachi

Subject: TI Pakistan Recommendations on implementing generic medicine policy to purchase and prescribe medicines with generic name only, and use of least cost method in Procurement of Drugs which are registered and approved by DRAP to save annually Billion of rupees to the exchequer and citizens

Dear Sir,

Transparency International Pakistan refers to its letters dated 26th April 2021 and 22nd June 2021 addressed to the Managing Director, Public Procurement Regulatory Authority (PPRA) and officer of the Prime Minister **(Annex-A)**.

TI Pakistan has highlighted the need that drugs/medication be made available to the ordinary citizens at the cheapest price possible. In this regard, the Chief Executive Officer of DRAP issued an advisory to all provinces and federal controlled units, on 16th April 2021, to ensure that doctors prescribe medicines with their generic names instead of brand names, in the public and private sector throughout the country as this practice adds to the economic burden of the country**(Annex-B).**

However, this policy is facing failure of implementation. According to Drug Regulatory Authority of Pakistan Act, 2012 (DRAP Act), and under **Article 7, Powers and functions of the Authority**, all Medicines/Drugs shall be approved and registered with DRAP, and that DRAP is the only approving authority in Pakistan for quality of medications and once it registers a medicine, for example **Aspirin,** it means that the Aspirin's quality and MRP is approved by DRAP.

A comparison Table below shows that Aspirin in 300 mg category, has the cheapest price which is significantly lower than the costliest tablets **i.e. 5 times costlier.**

Product	Company	Retail Price
ASPIRIN	IRZA PHARMA (PVT) LTD.	132.00
ASPIRIN	IDEAL PHARMACEUTICAL INDUSTRIES	125.00
ASPIRIN	PHARMACARE LABORATORIES (PVT) LTD.	80.00
ASPIRIN	UNEXO LABS (PVT) LTD.	96.00
ASPIRIN	WILSHIRE LABORATORIES (PVT) LTD.	150.00
ASPIRIN	KARACHI PHARMACEUTICAL LABORATORY	130.00
ASPIRIN	SHIFA LABORATORIES.(PVT) LTD.	150.00
ASPIRIN	IPRAM INTERNATIONAL	0.00
ASPIRIN	FERRO PHARMACEUTICAL LABORATORIES	110.00

ASPIRIN	FLOW PHARMACEUTICALS (PVT) LTD.	85.00
ASPIRIN	MEDICAIDS PAKISTAN (PVT) LTD.	106.96
ASPIRIN	AMROS PHARMACEUTICALS.	130.00
ASPIRIN	GEOFMAN PHARMACEUTICALS	183.04
ASPIRIN	FEROZSONS LABORATOIES LTD.	144.00
ASPIRIN	FEROZSONS LABORATOIES LTD.	49.00
ASPIRIN	IDEAL PHARMACEUTICAL INDUSTRIES	57.00
ASPIRIN	KARACHI PHARMACEUTICAL LABORATORY	47.00
ASPIRIN	LAHORE CHEMICAL & PHARMACEUTICAL WORKS (PVT) LTD	144.20
ASPIRIN	LAHORE CHEMICAL & PHARMACEUTICAL WORKS (PVT) LTD	245.57
ASPIRIN	LISKO PAKISTAN (PVT) LTD	154.56
ASPIRIN	ARDIN PHARMACEUTICALS	182.00
ASPIRIN COMPOUND	PROGRESSIVE LABORATORIES	300.00
ASPIRIN COMPOUND	KARACHI PHARMACEUTICAL LABORATORY	209.10
ASPIRIN DISPERSIBLE	EURO PHARMA INTERNATIONAL	300.00
ASPIRIN SOLUBLE	NAWABSONS LABORATORIES (PVT) LTD.	120.00

From above examples it can be seen that on average branded medicines prices are 3000% to 4000% higher than approved non-branded medicines. When generic medicine policy is implemented, public will get 90% relief in medical expenses. Furthermore, the comparison of price of medicines fixed by the provincial government of Punjab dated 26th July 2025 is given as under:

Sr. No.	Medicine Generic Name	Punjab Govt Rate (Rs/unit)	Available Brand	Market Price (Rs/unit)	%age Difference
1	Monelukast 10mg tab	3.07	Singulair	93	**3029.31**
2	Omeprazole 20mg	1.7	Losec 20mg	67.85	**3991.18**
3	Esitalopram 10mg	2.93	Cipralex 10mg	100	**3412.97**
4	Pregabalin 75mg cap	6.21	Lyrica 75 cap	143.67	**2313.53**
5	Atorvastatin 20mg tab	2.73	Lipiget 20 mg	55	**2014.65**
6	Ceftriaxine 1Gram Injection	78	Rocephin 1g	1244	**1594.87**
7	Tobramycin + dexamethasone ED	70	Tobradex ED	731	**1044.29**
8	Losartan potassium 50mg cap	2.9	Xavor 50mg	30.86	**1034.48**
9	Fluconazole 150mg cap	39.51	Diflocan 150mg	620	**1569.22**
10	Glimipride 2mg tab	1.37	Evopride 2mg	17.23	**1257.66**

11	Moxifloxacin 400mg inj	160	Avelox inj	2071	**1294.38**
12	Omeprazole inj 40mg	53	Risek Inf	530	**1000.00**

The best international practices highlight that a generic medicine system is often considered beneficial for a national health policy due to its potential to improve affordability, accessibility, and efficiency in healthcare. This is because:

- Generic medicines are significantly cheaper and cost-effective than the brand-name drugs.
- Generic medicines increase access as lower costs mean more people, especially in low-income or underserved populations, can afford essential medications. In Pakistan, where affordable healthcare is a problem for wider section of the society, generic medicines can promote equitable healthcare access and help address disparities in treatment across socioeconomic groups.
- Generic medicines can also foster competition in the pharmaceutical market in Pakistan, which can drive down prices further and incentivize innovation in cost-effective drug production.

Transparency International Pakistan requests the Federal Minister for Health to look into TI Pakistan's recommendations, probe into non-implementation of generic medicine guidelines despite clear directives of the past and issues directives on implementing generic medicine policy to save billions to the national exchequer and the citizens of Pakistan.

Transparency International Pakistan is striving for across the board application of Rule of Law, which is the only way to stop corruption, and achieve against Zero tolerance against Corruption,

With Regards,

Advocate Daniyal Muzaffar
Trustee/Legal Advisor
Transparency International Pakistan

Copies forwarded for the information with request to take action under their mandate to in all the provinces and their PPRA Rules also:

1. Chief Secretary, Government of Sindh, Karachi
2. Minister, Ministry of Health Govt of Sindh, Karachi
3. Managing Director, Sindh Public Procurement Regulatory Authority, Karachi
4. Registrar, Sindh High Court, Karachi

Annex-A

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Email: ti.pakistan@gmail.com
Website: www.transparency.org.pk

9th June, 2021

TL21/06/09/1B

Muhammad Azam Khan,
Principal Secretary to Prime Minister,
PM House, Islamabad

Subject: Efforts to counter Prime Minister's Policy to purchase and prescribe medicines with generic name only, to save annually Billion of rupees of the exchequer and also citizens.

Dear Sir,

Transparency International Pakistan refers to its letter No.TL21/04/26/1A dated 26.4.2021, addressed to the Managing Director, Public Procurement Regulatory Authority (PPRA) and copied to you, **Annex-A.**

On the policy decided by the Prime Minister of Pakistan that drugs/medication be made available to the ordinary citizens at the cheapest price possible, the Chief Executive Officer of DRAP issued an advisory to all provinces and federal controlled units, on 16th April 2021, to ensure that doctors prescribe medicines with their generic names instead of brand names, in the public and private sector throughout the country as this practice adds to the economic burden of the country. **Annex-B.**

However, this policy is facing failure of implementation, due to the reason that the PPRA Rules were amended in May 2020 to permit for a quality and cost based selection (QBCS) method, which effectively permitted hospitals to procure Drugs/Medicines based on a two-staged bidding method and determining the weightages internally. This amendment has effectively permitted hospitals to bypass the PM's directive by dividing the bidding process into technical and price based categories and awarding **80% marks on technical grounds and only 20% marks to lowest quoted prices**.

According to Drug Regulatory Authority of Pakistan Act, 2012 (DRAP Act), and under **Article 7, Powers and functions of the Authority**, all Medicines/Drugs shall be approved and registered with DRAP, and that DRAP is the only approving authority in Pakistan for quality of medications and once it registers a medicine, for example **Aspirin,** it means that the Aspirin's quality and MRP is approved by DRAP. **Annex-C.**

A simple cursory view of the Table attached hereto as Annex-B, shows that Aspirin in 300 mg category, the cheapest price is offered by M/s Delux Chemical Industry, Deerin at Rs 100/1000 and costliest tablets are produced by M/s. Hi-Noon Pharma by the name of Loprin at Rs 1,000/1000. **i.e. 19 times costlier**.

Attached is the Table, which shows how costlier Medicines are being procured, based on QCBS Method, **Annex-D.**

In light of the DRAP Act, Quality once approved by DRAP, cannot be challenged by the departments, hospitals, at the time of procurement.

And the concerned procuring agencies and/or medical institutions are only permitted to procure the required medication, at the lowest cost available, from the list of DRAP approved generic medication.

TI Pakistan sent a letter to PPRA to implement DRAP's advice for procurement of Drugs/Medicines, however PPRA did not agree with DRAP's recommendations and replied that the PPRA Rules, as amended in May 2020 to allow for QCBS Method, should be used for any drug/medication procurement process. **Annex-E**

This PPRA directive amounts to non-compliance of the PM's directive and effectively bypasses the regulatory authority and/or oversight of DRAP in the procurement process.

As an example, Prime Minister's attention is invited on the discretionary criteria, to reject anyone, to assess the quality of Medicine by one procuring agency .

The following evaluation criteria is in direct conflict of PPRA Rules and shall be deleted from the Tender, as it permits the procuring agency to eliminate the lowest quoted medication, based on determination of efficiency and patient compliance, whereas the only criteria for determining the quality and efficacy of the medication is that they shall be approved by DRAP.

> ***Part-II: Evaluation Criteria for Selection Of Brands / Types of Medicines & Medical Stores (As Applicable)***
>
> *b.* ***Patient Compliance***
>
> *(1)* *MSAC in co-ordination with concerned specialists, will assess patient compliance of different brands.*
>
> *(2)* *Drugs having better compliance with respect to following will be accepted:*
>
> *(a)* *Presentation*
> *(b)* *Taste*
> *(c)* *Smell*
> *(d)* *Intensity of side effects*
> *(e)* *Faith of prescriber/user*

We therefore request the Prime Minster of Pakistan to inquire in to the reason for amending and altering the PPRA Rules, vide SRO No.442(I)/2020 dated May 2020, to included and permit for a QCBA Method for procurement of drugs/medication, and the possibility of repealing the amendment.

Transparency International Pakistan is striving for across the board application of Rule of Law, which is the only way to stop corruption, and achieve against Zero tolerance against Corruption,

With Regards,

Jus (R) Nasira Iqbal,
Sitara-e-Imtiaz
Vice Chairperson
Transparency International Pakistan

Copies forwarded for the information with request to take action under their mandate to in all the provinces and their PPRA Rules also:

1. Muhammad Azam Khan, PSPM, PM House, Islamabad
2. Dr. Faisal Sultan, Special Assistant to Prime Minister on Health, Ministry of National Health Services Regulations and Coordination, Islamabad
3. Chairman, National Accountability Bureau (NAB), Islamabad
4. Registrar, Supreme Court of Pakistan
5. MD, PPRA, Islamabad

Annex-A

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22nd April, 2021

TL21/04/22/1A

Managing Director,
Public Procurement Regulatory Authority (PPRA)
Islamabad,

Subject: Use of Least Cost Method in Procurement of Drugs which are registered and approved by DRAP to save annually Billion of rupees on purchase of drugs.

Dear Sir,

Transparency International Pakistan refers to the letter of CEO Drug Regulatory Authority of Pakistan (DRAP) 16th April issued on the advise of the Prime Minister's Performance Delivery Unit (PMDU), to all secretaries of health departments of all four provinces, Azad Jammu Kashmir (AJK) and Gilgit-Baltistan (GB) and Commissioner of Islamabad Capital Territory (ICT) to ensure that doctors prescribe medicines with their generic names in public and private sector in the country, as such practice is also against the Code of Ethics for medical and dental practitioners, and discourage the practice of incentivized prescription in the best interest of patients and the country (**Annex-A**).

A number of Federal Procuring Agencies, are also conducting Procurement of medicines, based on quality based evaluation criteria, which eliminates many medicines approved by DRAP, to procure from incentivized manufacturers/brand. An example is the tender invited by DIRECTORATE OF PROCUREMENT (NAVY), Tender No. 2083031/R-2010/380089/A, advertised on 19/4/2021for medicines, Flurbiprofen 50mg, Allopurinol 300 Mg I, Buprofen 30gm, Citicoline Syp 100mg, Citicoline Cap 500mg, Trazodone 100mg, Dothiepin 25 Mg, **to be submitted by 4th May, 2021.**

The following evaluation criteria is in direct conflict of PPRA Rules and shall be deleted from the Tender, as allows the procuring agency to eliminate lowest quoted medicines, based on determination of efficiency and patient compliance, whereas as the only criteria for determining the quality of medicines is that bit shall be approved by DRAP.

> ***Part-II: Evaluation Criteria for Selection Of Brands / Types of Medicines & Medical Stores (As Applicable)***
>
> *3. In addition to the criteria laid down above for selection of firms/ suppliers peculiar to the production / delivery of medicines, various brands/ types of medicines quoted by eligible firms/ suppliers shall be selected by standing Medical Stores Advisory committee (MSAC) based on evaluation process given hereunder:*
>
> *a.* ***Efficacy in relation to Drug patient recover rate.***
>
> *(1) As the efficacy of different brands varies considerably directly affecting the length of treatment and total cost, hence MSAC will assess the rate of recovery of different brands.*

(2) Those brands that have shown better recovery rate will be endorsed.

b. ***Patient Compliance***

(1) MSAC in co-ordination with concerned specialists, will assess patient compliance of different brands.

(2) Drugs having better compliance with respect to following will be accepted:

(a) Presentation
(b) Taste
(c) Smell
(d) Intensity of side effects
(e) Faith of prescriber/user

Managing Director PPRA is requested to ensure that the directives of DRAP dated 16 April 2021 for compliance of the advise of the Prime Minister's Performance Delivery Unit (PMDU), to make all procurement of medicines on the lowest quoted priced medicines (approved by DRAP),

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With Regards,

Jus (R) Nasira Iqbal,
Sitara-e-Imtiaz
Vice Chair,
Transparency International Pakistan

Copies forwarded for the information with request to take action under their mandate to in all the provinces and their PPRA Rules also:

1. Muhammad Azam Khan, PSPM, PM House, Islamabad
2. Dr. Faisal Sultan, Special Assistant to Prime Minister on Health, Ministry of National Health Services Regulations and Coordination, Islamabad
3. Chairman, National Accountability Bureau (NAB), Islamabad
4. Registrar, Supreme Court of Pakistan
5. Chief Minister Sindh, CM House, Karachi
6. Chief Minister Punjab, CM House, Lahore
7. Chief Minister KP, CM House, Peshawar
8. Chief Minister Balochistan, CM House, Quetta

Annex-B

No. F. 8-1/2019 DD (PS) Vol.II
Government of Pakistan
Ministry of NHSR & C Islamabad
DRUG REGULATORY AUTHORITY OF PAKISTAN
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"SAY NO TO CORRUPTION"

Islamabad, the th of April 2021

The Secretary, Department of Health, Government of Sindh, **Karachi.**	The Secretary, Department of Health, Government of Azad Jammu Kashmir, **Muzaffarabad.**
The Secretary, Specialized Healthcare & Medical Education Department, Government of Punjab, **Lahore.**	The Secretary Primary & Secondary Healthcare Department, Government of Punjab, **Lahore.**
The Secretary, Department of Health, Government of Khyber Pakhtunkhwa **Peshawar.**	The Secretary, Department of Health, Government of Gilgit-Baltistan, **Gilgit.**
The Secretary, Department of Health, Government of Balochistan, **Quetta.**	Chief Commissioner, Islamabad Capital Territory, **Islamabad.**

Subject: **Complaint Received Through PMDU Regarding Prescription by Generic Names of Medicines.**

Reference to the subject cited above, it is stated that several complaints have been received through PMDU wherein the citizens have raised concern over company influenced brand-based prescription of medicines by doctors in government and private sectors. This practice adds to the economic burden of the country and also puts financial load on patients due to purchase of pricier brands. Such practice is also against the Code of Ethics for medical and dental practitioners

2. You are therefore requested to take necessary measures for promoting generic prescriptions by doctors and discourage the practice of incentivized prescription in the best interest of the patients and the country.

16/04

Dr. Abdur Rashid
Director (Pharmacy Services)
Drug Regulatory Authority of Pakistan

Copy to:
1. PS to the CEO, Drug Regulatory Authority of Pakistan