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Lumpur, WP Kuala Lumpur,

30th March 2016

**YB Datuk Seri Dr. S. Subramaniam Minister of Health, Malaysia.**

Dear YB Datuk Seri,

**RE : STAKEHOLDERS ENGAGEMENT FOR PHARMACY BILL [ RUUF ]**

We the undersigned would like to thank you for the recent engagement with the Pharmaceutical Services Department, Ministry of Health, Malaysia facilitated by PEMANDU in December 2015.

Indeed many issues were discussed and our "best possible" feedbacks, bearing in mind the constraints of the meeting, were given to the organizers for further action.

We would like to highlight that the conduct of the said meeting and the limited availability and accessibility of the draft Bill was not conducive for us to provide more comprehensive proposals. As a specific example, the dispensing of medications for drug substitution treatment by pharmacists without medical supervision contradicts many provisions of Act 283 DRUG DEPENDENTS (TREATMENT AND REHABILITATION) ACT 1983. Other issues like compounding of medicines by Registered Medical Practitioners and the details regarding Classification of medicines were not adequately discussed in sufficient detail.

It was our stand that all provisions of the RUUF should not in any way interfere with the statutory role, duties, and responsibilities of the doctor and the practice of medicine as defined by the existing Medical Act, PHFSA and the Poisons' Act. The RUUF should limit itself to the registration and regulation of pharmacists and pharmaceutical practice.

It is our ardent hope that all our concerns have been duly addressed and incorporated into the revised version of the RUUF. We would like to bring to your attention two important commitments from PSD namely:

- 1: The promise by Pharmaceutical Services Department officials, Ministry of Health that a second round of engagements will be organized after the draft bill was discussed with your good self before the Bill is sent to the Attorney Generals Chambers.
- 2: That there will be a proper and open Public Online Engagement subsequently before the Bill is tabled in Parliament.




We would like to highlight that the medical profession was grossly under-represented and note the exclusion of the following important stakeholders in the previous engagement:

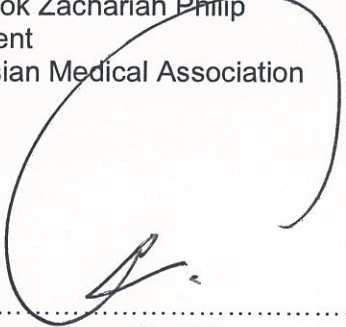
- a) Doctors in the specialist societies and medical academies under the Academy of Medicine Malaysia,
- b) Medical NGOs and doctors group like those in the University of Malaya Centre of Addiction Sciences, Addiction Medicine Association of Malaysia and others who treat patients with drug addiction,
- c) Doctors who are involved in clinical trials like those in the Clinical Research Centre (CRC), Ministry of Health, Malaysia, ~~and lastly,~~
- d) Doctors who are involved in veterinary services like those in Department of Veterinary Services of the Ministry of Agriculture, Malaysia and Malaysian Veterinary Council.
- d) Patient Support Groups representing the very people who will be affected by changes consequent to the RUUF.

Thank you.

Yours truly,

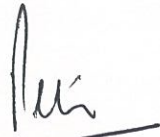


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Dr Ashok Zachariah Philip  
President  
Malaysian Medical Association



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Dr Steven Chow Kim Weng  
President  
Federation of Private Medical Practitioners' Associations, Malaysia






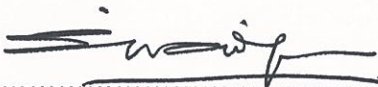
.....  
Mr. Peter Chan Teck Hock  
President  
Medical Practitioners Coalition Association of Malaysia



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YB Dato' Dr Ahmad Shukri Ismail  
Yang DiPertua,  
Pertubuhan Doktor-Doktor Islam Malaysia



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Dr Paul Chelliah  
President  
Veterinary Association Malaysia



.....  
YB Prof. Datuk Dr. Sheikh Mohd Amin  
President  
Academy of Family Physician Malaysia



.....  
Dr John Ting Sii Ong  
President  
Malaysian Dental Association

Copy to:

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Attorney General of Malaysia
  
- (2) YBhg. Datuk Dr Noor Hisham Bin Abdullah  
Director General  
Ministry of Health Malaysia
  
- (3) YBhg. Dato'Eisah Binti A.Rahman  
Senior Director  
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- (4) YBrs. Mr.Fabian Bigar  
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PEMANDU