

# ALL INDIA SYRINGES & NEEDLES MANUFACTURERS ASSOCIATION

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Rajiv Nath, President

Vimal Khemka, General Secretary

Date : 05.10.2021

To,  
Shri Amit Yadav,  
Directorate General of Foreign Trade (DGFT)  
Ministry of Commerce  
Udyog Bhawan, New Delhi-110001.  
Email : dgft@nic.in

Sub: Re: Amendment in Export Policy of Syringes and Incorporation of Policy Condition

Respected Sir,

Our members who have been at the forefront to fight COVID19 are highly disappointed over Govt's sudden decision to restrict the export of syringes as it will put the domestic syringe makers in a very awkward position with our overseas buyers.

Many Countries are counting on India to support global immunization / vaccination projects mainly for children for Yellow Fever or Measles, Hepatitis B, Pentavalent or BCG etc. Those are not the syringes used for COVAX Supplies of 0.5 ML AD etc. We cannot deprive those children from those immunization commitments as those syringes will anyways not be used for Covid vaccination in India and will lie unused in our factories causing us huge losses. This is our ongoing global contractual commitments to support global vaccination projects.

The supply chain management is currently challenged temporarily due to peak seasonal spike in demand of standard disposable syringes for Dengue & Typhoid etc. This will definitely ease by Nov mid but as of now it's important to focus on Non-Covid care as first priority & then second priority should be vaccination preventive care but the exports sudden restrictions are disruptive as it will create problems for the Indian syringe manufacturers and we are getting calls from members how to handle cargo left our factory and under custom clearance at ICD & Airports. There will be huge demurrage and upset customers.

When India and the world got ready for making vaccines, we have been time and again requesting Govt. that it is very prudent to plan on time for drug delivery of these vaccines for ensuring timely availability of correct size of syringes to having a status of availability of vaccines to avoid shortages of appropriate types of syringes for vaccination of 1.3 billion people in India as different vaccines need different types of Syringes.

We wish Govt. had called for joint meetings between Vaccine Mfrs, Gol & Syringes and Needle Mfrs to create a balance between demand & supply and timely support for capacity creation like various Covid critical Medical Devices and used PLI Scheme to incentivize capacity increase. Such a situation could have been easily avoided. Now business commitments will need to be dishonored & credibility painstakingly built over the years & India's reputation as a dependable supplier and Manufacturing Hub of Syringes will be in tatters.

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We urge the Govt :

- To lift the restriction on Non-Covid sizes of syringes like 0.3 ml or 1 ml Insulin syringes, 5 ml & larger syringe sizes which can't be used in India for vaccination and will be a wasted capacity otherwise.
- permit exports of 0.5 ml , 1 ml , 2ml , 3 ml that are used both in vaccination or curative injections to say Approximately 50% of the quantity shipped to a country last year in Oct - Jan period when global demands were limited too .
- Clarity should be given of India's quarterly needs by MoH&FW for Jan - March 2022 and financial year 2022 as we can't plan on 2-4 months window horizon basis

Consider to Reschedule target for 2 Billion vaccination from Dec/ Jan to be a more realistic Jan/ February as post dengue season more syringes will be available for Covid vaccination after November.

We seek clarification on the application to seek approval from DGFT against these restrictions ASAP and a dialogue with Ministry of Health.

Many Thanks

  
Vimal Kumar Khemka  
General Secretary  
All India Syringes & Needles Manufacturers Association

CC,  
Shri Rajesh Bhushan, Convenor of Empowered Committee & Secretary, MOH&FW, Email: secyhfw@nic.in  
Ms. S Aparna, Secretary, Dept. of Pharmaceuticals, Email: secy-pharma@nic.in  
Shri B.V.R. Subrahmanyam, Commerce Secretary, Email: csoffice@nic.in

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