

Date : 06.10.2021

To,  
Shri Piyush Goyal,  
Honorable Minister of Commerce and Industry and  
Minister of Consumer Affairs  
E-mail: [officeofmr@gov.in](mailto:officeofmr@gov.in); [cimoffice@nic.in](mailto:cimoffice@nic.in); [minister-ca@nic.in](mailto:minister-ca@nic.in)

**Sub : Re : Amendment in Export Policy of Syringes and incorporation of Policy Condition**

Reference : Dept. of Commerce Notification No. 34/2015-2020 dt : 4<sup>th</sup> October, 2021

**Respected Honorable Minister Shri Piyush Goyal Ji,**

We are Dismayed & Disappointed to note restrictions incorporated on exports of Syringes & Needles !

The supply chain management within India is currently challenged temporarily due to peak seasonal spike in demand of Standard Disposable Syringes for Dengue and Typhoid etc in July to September Quarter - this will ease latest by November middle. As of now it's important for the 20 odd Syringe Manufacturers to focus on Non Covid Curative care as priority one and then priority two is vaccination preventive care and then honoring exports commitments, but turning off the tap suddenly from average monthly exports of 130 million Syringes to 40 million pcs is disruptive. It takes lots of efforts and years to build credibility as a global supplier and India's reputation as Manufacturing Hub of Syringes will be tarnished as being undependable. You can be assured we understand India's needs come 1<sup>st</sup> and on voluntary basis many of us were not accepting new business export opportunities last quarter.

**As it's not a ban, but restrictions, we request that the restrictions may kindly not be applied to :**

- 1- Non Covid sizes like Insulin Syringes, 5ml & larger Syringe sizes or 0.3 ml AD Syringes developed for Pfizer. These Syringes can't be used in India for Covid Vaccination and will be wasted capacity otherwise (?)
- 2- At least 50% of the quantity shipped to a Country last year in October - January period of 0.5 ML / 1 ML / 2 ML & 3 ML may be allowed to be maintained ?

This will enable a historical past performance benchmark of limited delivery needs to be catered to, even if rationing does need to be done, which is understandable.

3- Clarity may given of India's quarterly needs by MoH&FW for calendar year 2022 especially January to March 2022.

4- Covid Vaccination target of 2 Billion by December end may be rescheduled to January / February 2022 as a realistic target.

Many Thanks for your kind Support. Assuring you of our sincere intentions.

Yours Sincerely,



Rajiv Nath  
Forum Coordinator  
Association of Indian Medical Device Industry (AiMeD)  
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CC,

Shri B.V.R. Subrahmanyam, Commerce Secretary, Email: [csoffice@nic.in](mailto:csoffice@nic.in)  
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Encl : Copy of Dept. of Commerce Notification No. 34/2015-2020 dt : 4<sup>th</sup> October, 2021