

मिसिल स.- 8(64)/2019/डी.पी/एनपीपीए-डीवी-॥

F. No. 8(64)/2019/DP/NPPA-Div. II

कार्यवाहीस. : 196/64/2019/F

Proceeding No : 196/64/2019/F

**MINUTES OF THE 196<sup>TH</sup> (OVERALL) AND 64<sup>TH</sup> MEETING OF THE AUTHORITY UNDER DPCO, 2013 HELD ON 26.02.2019 FOR FIXATION OF TRADE MARGIN ON SELECT CANCER DRUGS.**

The 196th meeting of the Authority (overall), which is the 64<sup>th</sup> meeting under the DPCO, 2013, was held on the 26<sup>th</sup> of February, 2019 under the Chairpersonship of Ms. Shubhra Singh, Chairperson, NPPA. The following members of the Authority were present:

- (i) Ms. Ritu Dhillon, Member Secretary
- (ii) Dr. S. Eswara Reddy, Drugs Controller General (India)
- (iii) Shri Arun Kumar, Advisor, Dept of Economic Affairs, Ministry of Finance
- (iv) Shri B. Bandyopadhyay, Adviser (Cost), O/o Chief Adviser (Cost), Department of Expenditure

Shri A.K.Pradhan, Deputy Drug Controller, Deptt. of Health & Family Welfare also attended.

The following officers of NPPA also attended the meeting and assisted the Authority in its deliberations:

- (i) Shri Kalyan Nag, Advisor
- (ii) Shri Amarपाल Singh Sawhney, Director (Pricing)
- (iii) Shri Baljit Singh, Dy. Director
- (iv) Shri Prasenjit Das, Asstt. Director (Pricing)
- (v) Shri Prakash Hemani, Asstt. Director

Chairperson, NPPA welcomed all present in the meeting.

**Agenda item no. 1 - Trade Margin Rationalisation of select Non-scheduled Anti-Cancer Drugs under Paragraph 19 of DPCO, 2013**

The Authority noted that the Drug Prices Control Order, 2013, is applicable to all drugs and NPPA monitors the prices of all the drugs including non-scheduled drugs under Para 20. NPPA also fixes the prices of scheduled formulations and monitors price increase of non scheduled formulations so as to ensure that the prices of these drugs do not increase beyond 10 percent in a year. NPPA ensures availability of these drugs and also that no unethical profiteering at the cost of patients happen in case of any drug/device because of information

asymmetry between patient and the doctor and the healthcare system as a whole. NPPA, working on behalf of the government, is also conscious of its obligation to ensure affordable health care to people as enshrined in the Constitution of India.

2. The Authority also noted that

i) The Indian pharmaceutical industry is valued at US \$ 34 billion, of which about 50 percent drugs are exported to other countries. India is called the Pharmacy of World. However, due to prevalent inequalities, out of pocket expenditure on medicines is the single largest contributor to pushing families beyond poverty threshold in the country. Thus, ensuring affordable drugs is a necessary pre-requisite for bringing down the overall healthcare expenses and to achieve the overall goal of affordable healthcare for all.

ii) The judgment dated 19.03.2013 of the Hon'ble High Court of Punjab & Haryana in CRL Misc. No. M-14171 of 2008 (Ranbaxy Laboratories Limited vs. The State of Haryana & ors.) noted as under.

“it has been noticed that although the petitioner is allegedly selling the drug in question to the consumers at about 900% of reasonable price of drug, but there appears to be no legal provision in force to save the consumer from such naked fleecing of consumers by the petitioner or other drug manufacturers by pricing the drug to such an extent. It is surprising no remedial or ameliorating step has been taken either by State or by Union of India in this regard. The court hopes that now at least the concerned authority shall wake up and shall take some remedial step to save the consumers from such fleecing.”

iii) The scheduled formulations currently under price cap form 16-17 percent of the pharma industry, the only control on the remaining non-scheduled drugs is by ensuring that the annual price increase is not more than 10 percent. It is important to examine options for rationalisation of prices in this segment. One major factor that contributes to high drug prices in India, is the unreasonably high trade margins. Trade margin is the difference between the price at which the manufacturers sell the drugs to stockist / distributors (price to stockist) and the final price to patients (maximum retail price).

iv) The matter with regard to regulation of Trade Margin has been under discussion since a long time. The matter pertaining to trade margins had been discussed in the interim Report of Sandhu committee constituted by Department of Chemical and Petrochemicals submitted in November, 2004. Subsequently, the committee on 'High Trade Margin in the sale of drugs' submitted a Report on 09.12.2015, after holding large scale consultation with various stakeholders. This report is in public domain since year 2015. This Report inter-alia stated that 'It is neither the desire nor is it possible for the government to interfere in the day to day business activities of the industry. Government is, however, committed to saving the consumers

from such naked fleecing as rightly pointed out by the Hon'ble Punjab & Haryana High Court. Consumer protection is, however, an area where the Government has to regulate especially in the knowledge based industry like drugs where the consumer has little choice. The consumer is guided by the prescription / medicine dispensed by a doctor. He has to pay as per MRP, with or without discount. None of the DPCOs had capped MRP which is the guiding factor / purchase price for the consumer. There are no laws which control MRP / trade margin. Capping of trade margins is therefore necessary. The Committee recommends that intra trade margins could be decided by the industry subject to a cap to be notified by the Government from time to time.'

v) *The high trade margin in sale of drugs leads to high out of pocket expenses on healthcare. The Government therefore, seeks to undertake a Pilot for price control through 'Trade Margin Rationalisation Approach' as Proof of Concept before further upscaling it to include more drugs.*

3. It was also noted that:

i) 'Cancer is one of the leading causes of adult illness and death due to chronic and non-communicable diseases (NCD) in India. As per WHO estimate, there are approximately 18 million cases globally and 1.5 million in India alone. There were 8 lakhs cancer deaths in India in 2018. The number of new cases are estimated to rise to double in India in 2040. The financial burden associated with cancer can force patients and households to acute misery and even insolvency. It is also noted that out of pocket (OOP) expenditure on cancer hospitalization is about 2.5 times of overall average hospitalization expenditure. While catastrophic expenditure on cancer inpatient treatment is highest among all NCDs, poor health financing mechanisms and heavy reliance on out-of-pocket healthcare payments compels several cancer patients to resort to distressed means for treatment financing. In fact, previous studies on India suggest that about 60 and 32 percent households resort to borrowings and contributions (from friends and relatives) respectively for cancer hospitalization. It is estimated that almost more than 50% cancer patients avail the private sector facilities and out of pocket expenses in the Health care including cancer care is about around 65%.

ii) Cancer patients in India incur heavy out-of-pocket expenditures. The cancer drugs needs to be affordable so that whenever required the treatment can be provided at the earliest in the early stages when the cancer treatment is curable. The Authority noted that availability and affordability of cancer drugs will give impetus to treatment outcomes and will bring down the cost of common anti-cancer drugs which will increase affordability and accessibility of these drugs.

iii) It is also noted that 59 drugs, which are listed in scheduled I of DPCO, 2013 are already under price control.

iv) NPPA also took note that under similar situation price fixation notifications issued for certain drugs under paragraph 19 of the DPCO, 2013 by the NPPA on 10th July 2014 have been upheld by the Hon'ble High Court of Bombay in its judgment and Order dated 26th September 2016 in W.P.(C) No. 2700 of 2014 (Indian Pharmaceutical Alliance vs. Union of India) wherein the Hon'ble High Court, inter-alia, observed:

“20. .... when such failure is considered in the context of role the pharmaceuticals play in the area of public health, which is a social right, the Government intervention becomes necessary especially when exploitive pricing makes medicines un-affordable and beyond the reach of most and also puts huge financial burden in terms of out of pocket expenditure on healthcare....”

4. The Authority unanimously decided that in the light of excessive profiteering at the cost of patients taking place in case of Anti-Cancer drugs, the interest of the consumers' needs to be kept in the forefront and in Order to ensure that, NPPA must move urgently under Para 19 of DPCO, 2013 to correct the distortions in the existing market for eliminating profiteering and ensuring fair prices to people. The matter was found to be of great significance to public welfare, and enough public concerns have been raised on the exorbitant prices being charged from patients. Any further delay in price fixation will deprive the patients from access to affordable healthcare and defeat the very purpose of DPCO, 2013. The Authority observed that, therefore, extraordinary circumstances do exist, warranting immediate action under Para 19 of DPCO, 2013 to fix a ceiling price on Anti-Cancer drugs, urgently in public interest. Accordingly, the Authority felt that it is the need of the hour to take a corrective action towards curbing the profiteering in marketing of Anti-Cancer drugs and take a step towards the making the Healthcare more affordable for the suffering patients.

5. The Authority noted that the Expert Committee of Ministry of Health and Family Welfare (MoHFW) after examining in detail, deliberating and considering all available information/data/viewpoints and all relevant options for ensuring affordability of essential drugs to the patients, in case of Anti-cancer Medicines, has recommended 39 Anti-Cancer medicines for price control on pilot basis, which were forwarded by Department of Pharmaceuticals with the request that Trade Margin be capped for these drugs as Proof of Concept of 'Trade Margin Rationalisation'. Subsequently, NPPA forwarded a list of 16 Anti-cancer medicines, identified on the basis of trade margin analysis, to the MoHFW for their consideration for inclusion in list for price control. The Expert Committee of MoHFW after considering the list provided by NPPA, recommended 4 Anti-cancer medicines from this list for

price control. Out of the shortlisted 43 drugs, Imatinib mesylate being scheduled is already under price cap, hence excluded from the current exercise.

6. Taking all these into consideration, in Order to bring in regulation of drugs in the 'non-scheduled' segment, the Authority agreed to undertake a Pilot for Proof of Concept by capping prices of select Anti-Cancer drugs, identified by the MoHFW as being essential for the treatment of this disease.

7. NPPA sought direction / advice from the Standing Committee on Affordable Medicines and Health Products (SCAMHP) on the framework for undertaking Pilot as Proof of Concept for 'Trade Margin Rationalisation'. The recommendations of SCAMHP were deliberated upon in the Authority.

8. The following decisions were taken in the meeting:

i) **Methodology for fixing the price under trade margin route:** The Authority accepted the recommendation of the Standing Committee and finalised the formula for capping trade at 30% of the MRP. The agreed formula to derive the MRP by the manufactures is as below.

$$\text{Retail price of the product} = \text{Price to Stockist (PTS)} \times \left\{ 1 + \left( \frac{TM}{100-TM} \right) \right\}$$

Where TM = Trade margin not exceeding 30  
PTS = PTS for the month of June 2018

ii) Total **42 Anti-Cancer medicines to be placed under price cap** as follows:

Sl.No.	Name of the Drug
1	Azacitidine
2	Bendamustine Hydrochloride
3	Bortezomib
4	Crizotinib
5	Cytarabine
6	Dasatinib
7	Decitabine
8	Doxorubicin HCl Pegylated Liposomal Injection
9	Enzalutamide
10	Epirubicin
11	Eribulin mesylate
12	Erlotinib HCl
13	Estramustine phosphate
14	Everolimus

15	Exemestane
16	Fulvestrant
17	Irinotecan HCl Trihydrate
18	Lapatanib
19	Leuprolide acetate depot for Injection
20	Lomustine
21	Mitoxantrone
22	Nilotinib
23	Plerixafor
24	Carfilzomib
25	Cladribine
26	Triptorelin
27	Pomalidomide
28	Osimertinib
29	Pegasperagase
30	Regorafenib
31	Ribociclib
32	Clofarabine
33	Sunitinib
34	Olaparib
35	Olaratumab
36	Paclitaxel (Protein-bound particles)
37	Cabazitaxel
38	Bevacizumab
39	Lenalidomide
40	Pegfilgrastim
41	Mitomycin
42	Pemetrexed

9. The Authority further decided that

i) **Every manufacturer shall recalculate its MRP** as stated above for its product based on the average first point of sale computed on the basis of PTS for the month of June-2018 as follows:

$$\text{Price to Stockist (PTS)} = \frac{\text{(Sum of Net sales realization of product by the manufacturer as the case may be for the sales during June-2018)}}{\text{Total Quantity of such product sold in June-2018}}$$

ii) In case there is no sale during the month of the June-2018, the Price to Stockist (PTS) shall be

$$\text{Price to Stockist (PTS)} = \frac{\text{(Sum of Net sales realization of product by the manufacturer as the case may be for the sales during 2018)}}{\text{Total Quantity of such product sold in the 2018}}$$

iii) Since many formulations are supplied by the manufacturers directly to the hospitals, **in such case, hospital will be treated as stockist.**

iv) As per the powers vested by the Government of India in the Ministry of Chemicals and Fertilizers under *paragraph 9(2) of DPCO 2013*, **the manufacturer shall be directed to provide the information of all the non-scheduled formulations containing drugs as per Table at paragraph 8(ii) by 6<sup>th</sup> March, 2019 as per Annexure I**, irrespective whether there is any change in MRP or not and irrespective of whether they are sold directly to hospital or through stockists.

v) The Authority deliberated that '**Trade Margin Rationalisation**' is a new methodology under consideration as a Pilot for a 'Proof of Concept'. The manufacturers would be required to submit the details of PTS and also re-fix the MRP on the basis of PTS. The manufacturers would also pass information on the revision in MRP to State Drug Controller, Medical Superintendents of Hospital / Medical Institutions and their stockists, retailers etc. Therefore, a period of 7 days is provided to the manufacturers. Accordingly, **the revised prices shall come into effect from 8<sup>th</sup> March, 2019** based on the information available / provided by manufacturers.

vi) The **Central Drugs Standard Control Organisation** (CDSCO) will direct the manufacturers to compulsorily report PTS and MRP of their formulations in the SUGAM portal of CDSCO.

vii) The Authority further noted that a substantive portion of anti-cancer medicines are sold directly to hospitals and medical institutions. Henceforth, the **Superintendents of Hospitals** and Medical Institutions shall be required to monitor the MRP's of formulations, as per this Order, and to ensure compliance. Any violation of this Order would be required to be brought to the notice of NPPA.

viii) **State Drug Controllers** shall monitor the compliance of this Order by the manufacturers / dealers / Hospitals / Medical Institutions and the manufacturers / dealers / Hospitals / Medical Institutions shall assist the State Drug Controllers in verifying the compliance to this Order. Any violation of this Order would be required to be brought to the notice of NPPA.

ix) **NPPA will set up Help-Desk** for any clarification w.r.t. implementation of this Order. In case any stake holder wish to have any clarification in this regard, can call on the help line number 1800111255 between 9.30 AM to 6.00 PM from 27<sup>th</sup> February to 6<sup>th</sup> March 2019 except Sunday and / or send query on public grievances portal of NPPA 'Pharma Jan Samadhan'.

x) NPPA will **request DoP to make suitable amendment in DPCO, 2013** to include definition of PTS and Trade Margin under paragraph 2 (definitions). Further, NPPA will request DoP to amend Form V of DPCO, 2013 to include reporting of PTS (as in June, 2018 and June of current year) and applicable rate of GST.

10. The Authority noted that as per DPCO 2013, there is no restriction on the price fixation of the patented drugs except if exemption has been claimed/approved under para 32. Therefore, the Authority decided that Patented medicines should also be covered under the Order.

11. The Authority noted that as per pharma data available for select drugs in this list, price rationalization is being extended to 72 formulations and 355 brands of these drugs. The net saving to the consumer would be atleast Rs. 105 crores. Price reduction across brands would vary from 86.79% of MRP to 0%. The price of about 105 brands would show decline as per data available with the Authority which is subject to further confirmation (Annexure II). The final list will be posted in public domain on 8<sup>th</sup> March 2019. The tentative Percentage wise reduction in the prices of brand was noted as follows:

Percentage wise reduction in the prices of formulation

Sl. no	Slab-Percentage reduction in prices	No. of Brands
1	70% and above	5
2	50% to 70 %	12
3	25% to 50 %	43
4	upto 25%	45
	TOTAL	105

12. The Authority noted that this being a Pilot of the 'Proof of Concept' for 'Trade Margin Rationalisation' may entail the possibilities of mid-course correction and further upscaling by inclusion of more drugs, based on experience. The Authority also noted that Trade Margin Concept entails self-regulation and would usher in a new price regulation regime.



13. The Authority also noted that in this proof of concept, the manufacturers are required to re-fix their MRP on the basis of the formula as given in Table A, therefore, the MRP of different brands of the same formulation can continue to be different for different manufactures. As a consequence in some cases the companies which are selling their brand of a drug at higher price may not be required to reduce the MRP on the basis of their PTS whereas other companies which are selling their brand of drug at a lower price may be required to further reduce their MRP on the basis of their PTS.

14. The Authority noted that this approach of controlling the MRP shall have a twin advantage as firstly, it shall prevent consumer exploitation by the trade channels and secondly, it shall increase competition which will force manufacturer selling the medicine at a higher price to bring down their prices also.

(Ritu Dhillon)  
Member Secretary

ANNEXURE : I

Format for submission of Revised MRP by the manufacturer

1. Name and address of the manufacturer / importer / distributor.

2. Name and address of the marketing company, if any.

Sl. No	Formulation				Composition approved by Drug Control Authorities	Pack Size	Price to Stockist (excl. of GST) (Rs.) as in June, 2018	Applicable GST Rate	Maximum Retail Price Arrived by applying the formula in Table A (incl. of GST) (Rs.)
(1)	(2)				(3)	(4)	(5)	(6)	(7)
	Drug	Strength	Dosage Form	Brand Name					

\*Formula to arrive MRP = Price to Stockist (PTS) x  $\left\{1 + \left(\frac{TM}{100-TM}\right)\right\}$  + Applicable GST

Where TM = Trade margin not exceeding 30

The information furnished above is correct and true to the best of my knowledge and belief.

(Signature and stamp)

Place:.....

Date: .....

Name of authorized person:

Designation :

Name of the Organisation/person:

Expected Impact of Trade Margin Rationalisation on Anti-Cancer Formulation / Brands (Non-Scheduled) as per Pharmatrac data available with NPPA as on 26.02.2019

Annexure : II

S. No.	SubGroup/API	Strength	Unit	Trademark	Marketing Company	Pack Size	Present MRP (Rs.)	PTS (Rs.)	Derived MRP (Including GST)	Tentative Savings	Reduction from present MRP
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
1	EPIRUBICIN	100 MG	INJECTION	EPITAZ	INTAS PHARMACEUTICALS LTD	1	3,663.01	322.67	484	9,91,850	86.79%
2	EVEROLIMUS	10 MG	TABLET	AFINITOR	NOVARTIS INDIA LTD	10	85,923.81	10,200.00	15,300	5,64,990	82.19%
3	PEGFILGRASTIM	6 MG	PREFILLED SYRINGE	PEGASTA	INTAS PHARMACEUTICALS LTD	1	10,300.00	1,620.00	2592	13,18,45,340	74.83%
4	PEMETREXED	500 MG	INJECTION	PEMECAD	CADILA PHARMACEUTICALS LTD	1	19,127.21	3,469.55	5551	1,49,335	70.98%
5	PEMETREXED	100 MG	INJECTION	PEMMET	INTAS PHARMACEUTICALS LTD	1	5,450.00	1,000.00	1600	53,36,100	70.64%
6	ERLOTINIB	150 MG	TABLET	ERLOTERO	HETERO HEALTHCARE LTD	30	9,900.00	2000	3,200	45,09,100	67.68%
7	CYTARABINE	100 MG	INJECTION	CYTOSAR	VHB LIFE SCIENCES LIMITED	1	352.00	79.00	119	4,437	66.34%
8	PEMETREXED	100 MG	INJECTION	ZUPEMED	ZUVENTUS HEALTHCARE LTD	1	4,333.33	920.00	1472	20,37,267	66.03%
9	IRINOCETAN	100 MG	INJECTION	IRINOTEL	FRESENIUS KABI INDIA PVT LTD	1	3,052.38	650.00	1,040	5,18,32,872	65.93%
10	LENALIDOMIDE	10 MG	CAPSULE	LENANGIO	DR. REDDYS LABORATORIES LTD	10	2,821.70	630.00	1008	3,96,16,649	64.28%
11	BORTEZOMIB	3.5 MG	INJECTION	BORTENAT	NATCO PHARMA LTD	1	16,800.00	3,794.65	6,071	1,92,89,951	63.86%
12	PEMETREXED	500 MG	INJECTION	ZUPEMED	ZUVENTUS HEALTHCARE LTD	1	14,190.47	3,425.00	5480	36,06,135	61.38%
13	EPIRUBICIN	10 MG	INJECTION	EPITHRA	GLENMARK PHARMACEUTICALS LTD.	1	551.00	144.00	216	15,54,735	60.80%
14	EPIRUBICIN	50 MG	INJECTION	EPITHRA	GLENMARK PHARMACEUTICALS LTD.	1	2,270.00	630.00	945	73,20,625	58.37%
15	CYTARABINE	100 MG	INJECTION	BIOBIN	ZYDUS CADILA	1	207.43	60.00	90	10,13,891	56.61%

Information in Column (10), (11) and (12) is tentative, based on the Pharmatrac data, subject to confirmation by manufacturers.

S. No.	SubGroup/API	Strength	Unit	Trademark	Marketing Company	Pack Size	Present MRP (Rs.)	PTS (Rs.)	Derived MRP (Including GST)	Tentative Savings	Reduction from present MRP
16	BENDAMUSTINE	100 MG	INJECTION	BIMODE	EMCURE PHARMACEUTICALS LTD	1	6,991.55	2,100.00	3,360	2,04,85,574	51.94%
17	PEMETREXED	100 MG	INJECTION	PEMECAD	CADILA PHARMACEUTICALS LTD	1	6,040.20	1,879.42	3007	39,431	50.22%
18	PEGFILGRASTIM	6 MG	PREFILLED SYRINGE	PEGLAST	ZUVENTUS HEALTHCARE LTD	1	<b>14,190.47</b>	4,500.00	7200	32,01,635	49.26%
19	BENDAMUSTINE	100 MG	INJECTION	BENZZ	INTAS PHARMACEUTICALS LTD	1	7,848.00	2,540.00	4,064	70,42,024	48.22%
20	LEUPRORELIN	3.75 MG	INJECTION	EUROLIDE	SAMARTH LIFE SCIENCES PVT LTD	1	4,611.60	1,496.25	2,394	64,95,350	48.09%
21	PEGFILGRASTIM	6 MG	PREFILLED SYRINGE	LUPIFIL	LUPIN LTD	1	8,930.00	2,950.00	4720	65,54,970	47.14%
22	PEGFILGRASTIM	6 MG	INJECTION	PEGGRAFEEL	DR. REDDYS LABORATORIES LTD	1	10,790.00	3,600.00	5760	11,78,57,930	46.62%
23	BENDAMUSTINE	100 MG	INJECTION	RIBOMUSTIN	JOHNSON & JOHNSON	1	11,000.00	3,795.00	6,072	2,20,57,728	44.80%
24	LEUPRORELIN	3.75 IU	INJECTION	LUPRORIN	INTAS PHARMACEUTICALS LTD	1	4,634.00	1,607.17	2,571	3,82,72,270	44.51%
25	EPIRUBICIN	50 MG	INJECTION	CADRUBIN	CADILA PHARMACEUTICALS LTD	1	3,300.00	1,250.00	1,875	1,51,050	43.18%
26	LEUPRORELIN	3.75 MG	INJECTION	LUPRODEX	BHARAT SERUMS & VACCINES LTD	1	4,095.00	1,500.00	2,400	8,35,90,620	41.39%
27	EPIRUBICIN	100 MG	INJECTION	ERUCIN	VENUS REMEDIES LTD	1	4,700.00	1,840.00	2,760	-	41.28%
28	EVEROLIMUS	5 MG	TABLET	EVELIMUS	EMCURE PHARMACEUTICALS LTD	10	19,400.00	7,619.05	11,429	-	41.09%
29	EPIRUBICIN	50 MG	INJECTION	EPICURE	EMCURE PHARMACEUTICALS LTD	1	2,390.00	950.00	1,425	20,93,085	40.38%
30	LEUPRORELIN	3.75 MG	INJECTION	AGOPRIDE DEPOT	ORDAIN HEALTHCARE PVT. LTD	1	3,937.50	1,500.00	2,400	8,17,950	39.05%
31	EVEROLIMUS	0.5 MG	TABLET	ADVACAN	BIOCON LTD	10	1,595.70	650.00	975	25,44,249	38.90%

S. No.	SubGroup/API	Strength	Unit	Trademark	Marketing Company	Pack Size	Present MRP (Rs.)	PTS (Rs.)	Derived MRP (Including GST)	Tentative Savings	Reduction from present MRP
32	BEVACIZUMAB	100 MG	INJECTION	BEVATAS	INTAS PHARMACEUTICALS LTD	1	25990	10001.55	16,002	9,32,33,499	38.43%
33	LEUPRORELIN	22.5 MG	INJECTION	LUPRODEX	BHARAT SERUMS & VACCINES LTD	1	20,100.00	8,000.00	12,800	3,91,13,400	36.32%
34	BEVACIZUMAB	100 MG	INJECTION	ZYBEV	ZYDUS CADILA	1	<b>27000</b>	10800	17,280	1,24,02,720	36.00%
35	LEUPRORELIN	3.75 MG	INJECTION	LEUFOL	VHB LIFE SCIENCES LIMITED	1	3,900.00	1,560.60	2,497	56,64,072	35.98%
36	EPIRUBICIN	50 MG	INJECTION	ALRUBICIN	ALKEM LABORATORIES LTD.	1	2,210.00	950.00	1,425	21,61,890	35.52%
37	EVEROLIMUS	0.25 MG	TABLET	ADVACAN	BIOCON LTD	10	797.80	350.00	525	5,87,066	34.19%
38	DOXORUBICIN (LIPOSOMAL)	20 MG	INJECTION	PEGADRIA	INTAS PHARMACEUTICALS LTD	1	7,848.00	3,500.23	5,250	60,05,778	33.10%
39	PEMETREXED	500 MG	INJECTION	PEMGEM	DR. REDDYS LABORATORIES LTD	1	<b>21,215.00</b>	8,905.00	14248	2,63,63,128	32.84%
40	DOXORUBICIN (LIPOSOMAL)	10 MG	INJECTION	LIPODOX	SUN PHARMA LABORATORIES LTD.	1	4,013.62	1,800.00	2,700	4,79,471	32.73%
41	EPIRUBICIN	50 MG	INJECTION	EPINEON	NEON LABORATORIES LTD	1	982.00	442.80	664	2,30,723	32.36%
42	DOXORUBICIN (LIPOSOMAL)	20 MG	INJECTION	RUBILONG	ZUVENTUS HEALTHCARE LTD	1	9,898.00	4,500.00	6,750	39,12,964	31.80%
43	IRINOCETAN	100 MG	INJECTION	IRNOCAM	DR. REDDYS LABORATORIES LTD	1	4,084.00	1,744.00	2,790	1,88,64,569	31.67%
44	REGORAFENIB	40 MG	TABLET	NUBLEXA	BAYER ZYDUS PHARMA PRIVATE LIMITED	28	<b>59294</b>	25413.28	40,661	5,65,50,402	31.42%
45	EPIRUBICIN	50 MG	INJECTION	EPITAZ	INTAS PHARMACEUTICALS LTD	1	2,235.00	1,025.03	1,538	11,13,836	31.21%
46	BORTEZOMIB	2.5 MG	INJECTION	BORVIZ	INTAS PHARMACEUTICALS LTD	1	12,499.29	5,400.00	8,640	47,89,379	30.88%
47	IRINOCETAN	100 MG	INJECTION	INTENSIC	NEON LABORATORIES LTD	1	781.00	337.50	540	1,16,885	30.86%
48	EPIRUBICIN	50 MG	INJECTION	EPIRUBITEC	UNITED BIOTECH (P) LTD	1	2,359.50	1,100.00	1,650	4,25,700	30.07%
49	CYTARABINE	100 MG	INJECTION	ARASID	INTAS PHARMACEUTICALS LTD	1	1,005.95	471.12	707	4,82,124	29.75%
50	PEMETREXED	100 MG	INJECTION	PEMEXAR	RPG LIFE SCIENCES LTD.	1	5,000.00	2,200.00	3520	1,79,080	29.60%

S. No.	SubGroup/API	Strength	Unit	Trademark	Marketing Company	Pack Size	Present MRP (Rs.)	PTS (Rs.)	Derived MRP (Including GST)	Tentative Savings	Reduction from present MRP
51	LEUPRORELIN	3.75 MG	INJECTION	LUPROLIDE	LUPIN LTD	1	4,611.00	2,043.90	3,270	80,23,108	29.08%
52	PEMETREXED	500 MG	INJECTION	PEXETRUST	PANACEA BIOTEC LTD	1	20,394.00	9,047.61	14476	2,07,77,480	29.02%
53	MITOMYCIN	40 MG	INJECTION	MITOMYCIN C	ZYDUS CADILA	1	2,620.00	1,166.40	1866	51,51,196	28.77%
54	FULVESTRANT	250 MG	INJECTION	FULVENAT	NATCO PHARMA LTD	1	<b>18,000.00</b>	8,078.57	12,926	5,18,44,000	28.19%
55	IRINOCETAN	40 MG	INJECTION	IRNOCAM	DR. REDDYS LABORATORIES LTD	1	1,825.50	826.00	1,322	33,81,169	27.60%
56	EPIRUBICIN	10 MG	INJECTION	EPINEON	NEON LABORATORIES LTD	1	244.00	117.90	177	33,575	27.52%
57	LEUPRORELIN	11.25 MG	INJECTION	LUPRODEX	BHARAT SERUMS & VACCINES LTD	1	<b>11,025.00</b>	5,000.00	8,000	94,80,350	27.44%
58	EPIRUBICIN	50 MG	INJECTION	ZUVICIN	ZUVENTUS HEALTHCARE LTD	1	2,169.62	1,050.00	1,575	13,22,435	27.41%
59	EPIRUBICIN	10 MG	INJECTION	EPITAZ	INTAS PHARMACEUTICALS LTD	1	600.00	296.45	445	1,83,905	25.89%
60	DOXORUBICIN (LIPOSOMAL)	10 MG	INJECTION	ONCODOX	CIPLA LTD.	1	222.62	110.00	165	16,767	25.88%
61	ERLOTINIB	150 MG	TABLET	LORTINIB	RPG LIFE SCIENCES LTD.	10	6375	3000	4,800	1,33,875	24.71%
62	LENALIDOMIDE	25 MG	CAPSULE	LENOMUST	PANACEA BIOTEC LTD	30	17,307.68	8,171.43	13074	3,93,705	24.46%
63	PEMETREXED	500 MG	INJECTION	PEMEXAR	RPG LIFE SCIENCES LTD.	1	<b>19,000.00</b>	9,000.00	14400	-	24.21%
64	CYTARABINE	100 MG	INJECTION	CYTARINE	FRESENIUS KABI INDIA PVT LTD	1	177.00	90.00	135	12,14,346	23.73%
65	CYTARABINE	100 MG	INJECTION	ARASID	INTAS PHARMACEUTICALS LTD	1	189.28	97.00	146	3,60,222	23.13%
66	LEUPRORELIN	11.25 MG	INJECTION	LUPRODEX	BHARAT SERUMS & VACCINES LTD	1	11,025.00	5,300.00	8,480	1,29,31,145	23.08%
67	PACLITAXEL	100 MG	INJECTION	PACLIALL	PANACEA BIOTEC LTD	1	11543.4	5580.56	8,929	1,48,13,780	22.65%
68	EPIRUBICIN	10 MG	INJECTION	EPIRUBITEC	UNITED BIOTECH (P) LTD	1	435.00	225.00	338	47,678	22.41%
69	LEUPRORELIN	22.5 MG	INJECTION	LEUPO	INTAS PHARMACEUTICALS LTD	1	21,000.00	10,207.35	16,332	20,72,699	22.23%

S. No.	SubGroup/API	Strength	Unit	Trademark	Marketing Company	Pack Size	Present MRP (Rs.)	PTS (Rs.)	Derived MRP (Including GST)	Tentative Savings	Reduction from present MRP
70	EPIRUBICIN	100 MG	INJECTION	EPICURE	EMCURE PHARMACEUTICALS LTD	1	3,409.25	1,800.00	2,700	4,83,709	20.80%
71	MITOMYCIN	2 MG	INJECTION	LYOMIT	UNITED BIOTECH (P) LTD	1	129.00	65.00	104	9,475	19.38%
72	EPIRUBICIN	100 MG	INJECTION	ALRUBICIN	ALKEM LABORATORIES LTD.	1	3,891.15	2,100.00	3,150	6,08,484	19.05%
73	PEMETREXED	100 MG	INJECTION	PEMGEM	DR. REDDYS LABORATORIES LTD	1	5,373.00	2,754.00	4406	63,65,061	17.99%
74	EPIRUBICIN	10 MG	INJECTION	CADRUBIN	CADILA PHARMACEUTICALS LTD	1	654.76	362.00	543	13,635	17.07%
75	PEMETREXED	500 MG	INJECTION	PEMETERO	HETERO HEALTHCARE LTD	1	13,200.00	6,900.00	11040	53,22,240	16.36%
76	DOXORUBICIN (LIPOSOMAL)	50 MG	INJECTION	NUDOXA	ZYDUS CADILA	1	18,585.03	10,389.61	15,584	27,15,557	16.15%
77	LEUPRORELIN	11.25 MG	INJECTION	LEUPO	INTAS PHARMACEUTICALS LTD	1	11,500.00	6,032.57	9,652	4,63,820	16.07%
78	LENALIDOMIDE	10 MG	CAPSULE	LENOMUST	PANACEA BIOTEC LTD	30	8,750.00	4,628.57	7406	2,54,070	15.36%
79	BEVACIZUMAB	100 MG	INJECTION	AVASTIN (ROCHE)	ROCHE	1	41250	22000	35,200	94,92,450	14.67%
80	PEMETREXED	500 MG	INJECTION	PEMEX	UNITED BIOTECH (P) LTD	1	25,000.00	13,378.00	21405	8,66,443	14.38%
81	EXEMESTANE	25 MG	TABLET	XTANE	NATCO PHARMA LTD	30	1,290.00	691.08	1,106	70,78,809	14.28%
82	EVEROLIMUS	10 MG	TABLET	VOLANTIS	DR. REDDYS LABORATORIES LTD	10	20,020.00	11,475.00	17,213	53,14,597	14.02%
83	EPIRUBICIN	10 MG	INJECTION	ALRUBICIN	ALKEM LABORATORIES LTD.	1	573.00	332.12	498	3,11,176	13.06%
84	DOXORUBICIN (LIPOSOMAL)	20 MG	INJECTION	PIGLIT	EMCURE PHARMACEUTICALS LTD	1	6,184.52	3,600.00	5,400	1,64,749	12.69%
85	EVEROLIMUS	0.25 MG	TABLET	CERTICAN	NOVARTIS INDIA LTD	10	920.00	540.00	810	330	11.96%
86	DOXORUBICIN (LIPOSOMAL)	50 MG	INJECTION	LIPISOL	ALKEM LABORATORIES LTD.	1	7,600.00	4,500.00	6,750	1,90,400	11.18%
87	EXEMESTANE	25 MG	TABLET	EXETRAZ	ALKEM LABORATORIES LTD.	10	810.00	450.00	720	2,10,420	11.11%
88	MITOMYCIN	2 MG	INJECTION	MITOMYCIN C	ZYDUS CADILA	1	196.70	110.00	176	15,13,232	10.52%

S. No.	SubGroup/API	Strength	Unit	Trademark	Marketing Company	Pack Size	Present MRP (Rs.)	PTS (Rs.)	Derived MRP (Including GST)	Tentative Savings	Reduction from present MRP
89	LEUPRORELIN	22.5 MG	VIAL	LUPROTAS	INTAS PHARMACEUTICALS LTD	1	21,000.00	12,000.15	19,200	10,92,454	8.57%
90	EVEROLIMUS	5 MG	TABLET	AFINITOR	NOVARTIS INDIA LTD	10	60,146.43	36,747.90	55,122	-	8.35%
91	ENZALUTAMIDE	40 MG	CAPSULE	ENZAMIDE	INTAS PHARMACEUTICALS LTD	28	27500	16000	25,600	17,04,300	6.91%
92	ENZALUTAMIDE	40 MG	CAPSULE	ENCRPC	INTAS PHARMACEUTICALS LTD	28	27500	16000.88	25,601	2,33,527	6.90%
93	ENZALUTAMIDE	40 MG	CAPSULE	GLENZA	GLENMARK PHARMACEUTICALS LTD.	28	27500	16200	25,920	6,43,060	5.75%
94	PEGFILGRASTIM	6 MG	INJECTION	PEGG TRUST	PANACEA BIOTEC LTD	1	8,125.00	4,800.00	7680	8,25,920	5.48%
95	PEGFILGRASTIM	6 MG	PREFILLED SYRINGE	PEGSTIM	ZYDUS CADILA	1	12,078.00	7,222.00	11555	1,41,89,315	4.33%
96	FULVESTRANT	250 MG	PREFILLED SYRINGE	STRANTAS	INTAS PHARMACEUTICALS LTD	1	20,000.00	12,000.00	19,200	9,68,000	4.00%
97	PEMETREXED	100 MG	INJECTION	PEMCURE	EMCURE PHARMACEUTICALS LTD	1	1,500.00	900.00	1440	63,000	4.00%
98	IRINOCETAN	100 MG	INJECTION	CAMPTO	PFIZER LTD	1	22,651.20	13,611.43	21,778	8,85,133	3.85%
99	PEMETREXED	100 MG	INJECTION	PEMTERO	HETERO HEALTHCARE LTD	1	2,750.00	1,656.00	2650	3,36,139	3.65%
100	EPIRUBICIN	50 MG	INJECTION	RUBILON	CELON LABS	1	1,712.15	1,106.93	1,660	17,183	3.02%
101	EVEROLIMUS	0.5 MG	TABLET	CERTICAN	NOVARTIS INDIA LTD	10	1,677.00	1,085.00	1,628	-	2.95%
102	EPIRUBICIN	50 MG	INFUSION	CIPRUBICIN	CIPLA LTD.	1	1,919.04	1,265.00	1,898	-	1.12%
103	EPIRUBICIN	10 MG	INJECTION	BIORUBIN	ZYDUS CADILA	1	333.33	220.00	330	3,916	1.00%
104	LAPATINIB	250 MG	TABLET	TYKERB	GLAXOSMITHKLINE PHARMACEUTICALS LTD.	10	3,000.00	1,871.55	2,994	73,720	0.18%
105	LEUPRORELIN	45 MG	INJECTION	ELIGARD	EMCURE PHARMACEUTICALS LTD	1	38,350.00	23,931.43	38,290	20,063	0.16%
					Total					1,04,81,69,651	