



GOVERNMENT OF PAKISTAN  
MINISTRY OF NATIONAL HEALTH SERVICES,  
REGULATIONS & COORDINATION

SECRETARY

Islamabad, the 24<sup>th</sup> March, 2021

Subject: **PROCUREMENT OF COVID-19 VACCINES BY THE PRIVATE SECTOR FOR COMMERCIAL SALE IN PAKISTAN**

My dear *Justia (Rtd) Nasira Iqbal Sebata!* *السَّلَامُ عَلَيْكُمْ وَرَحْمَةُ اللَّهِ وَبَرَكَاتُهُ*

Reference letter No.TL2021/03/22/IA, dated 22<sup>nd</sup> March, 2021 addressed to Secretary to Prime Minister on subject above. Pakistan remains committed to fighting Covid with everything available at its disposal. Over the last one year, Pakistan made a huge effort to put together a 'whole of the government approach' to make sure that the pandemic is contained, testing is ramped up, healthcare facilities are equipped and ramped up to deal with the rush of Covid patients, and finally that the general population is vaccinated expeditiously starting with the most vulnerable. The courts have given further strength to the government by endorsing its diverse efforts to fight the pandemic. Pakistan's efforts in this regard have been acknowledged by the world from time to time. Though the fight is far from over, we remain committed to employ all policy tools at our command to save as many lives, as we can.

2. Covid vaccination partly through the private sector is one such tool. It was a well considered decision of the Federal government to allow private sector to import vaccine as the national vaccination priorities favoured the healthcare workers and the elderly, involving some lag in reaching other segments of the society. This is expected in a large country like Pakistan, with population over 220 million. The government therefore, as a deliberate policy tool, allowed private sector to import vaccine to cater to those segments of the society, which were not on the immediate priority list of the government.

3. Initially the government approved such import without fixing the price, as no reference price under the law was available. Later on, a provision of Drug Pricing Policy for import of drugs under hardship category was applied to Covid vaccine to keep a check on prices instead of leaving it solely to free market dynamics.

4. It may be added that the government is fixing the maximum retail price, leaving room for competition and free market dynamics. It may also be added that Covid vaccine market dynamics entail sale in large quantities, typically in millions, and it is not easy for small players to access small number of doses. The economies of scale available to big players like governments and GAVI are not available to small players. Whatever number of doses they can bring in however, means potentially saving lives.

With kind regards,

  
24/03/2021

(AAMIR ASHRAF KHAWAJA)

**JUSTICE (R) NASIRA IQBAL,**  
Vice Chairperson,  
Transparency International Pakistan

**Copy for information to:**

- Dr. Faisal Sultan, SAPM on Health, M/o NHS,R&C, Islamabad.
- Mr. Azam Khan, Secretary to PM, PM's Office, Islamabad.