October 16, 2000

To
The Union Health Minister
Government of India
New Delhi

Dear Dr. C.P.Thakur,

We, the undersigned, women's organisations and health activists express our dismay, concern and protest at the present trend of population policies in the country which are self contradictory and profoundly anti-women. There are two issues involved both linked to each other. Firstly, the macro policy framework which is defined by the National Population Policy 2000, and secondly, the contraceptive policy which concerns the introduction of different types of contraceptives in the Government sponsored family planning programme.

At the outset, contrary to motivated propaganda against our position, we would like to categorically state that we advocate family planning in the interests of the poor and women in particular based on voluntary choice. **We firmly believe that women should have the right to decide the number of children they want and access to safe and affordable contraception.** We believe that women want and need safe contraceptive choices which are user controlled and which carry no risks to their health. We intend to meet the Union Health Minister with our concerns and depending on his response, launch a countrywide campaign on the issues involved.

Contraceptive Policy

In their bid to meet population targets under the World Bank tutelage, and as part of the 'liberalization' policies, successive Government's including your's, have in the past few years relaxed Drug regulations in order to expedite the introduction of long acting, invasive, hazardous contraceptives into India. Unchecked over-the-counter sales, misinformed doctors and inadequate Post Marketing Studies are the harsh realities of this strategy which is poised to subject millions of Indian women to contraceptives such as the injectables and sub-dermal implants, that will cause irreversible damage to their and their progeny's health.

The injectable contraceptive Depo-Provera was approved for marketing in India in 1993 without the mandatory phase 3 trials. This has marked a big victory for the parent company Upjohn, the American multinational, who has gained access to the second largest market without having to prove safety.

Women's groups, health groups and human rights groups throughout the country have opposed the introduction of this injectable given the potential for abuse, inadequacy of

research and the lack of accountability of pharmaceutical agencies. Conclusion from analysis of major studies from all over the world now compels us to call for a complete ban of injectable contraceptives from both the public (national family planning programme) and the private sector (including the NGOs) in the country In no case they should become a part of the Family Planning Programme.

Depo-Provera has been indicted for causing a climacteric-like syndrome (pre-mature menopause), irreversible atrophy of the ovaries and endometrium (inner lining of uterus) leading to permanent sterility, deaths due to spontaneous formation of clots inside blood vessels (thrombo-embolism), two fold increase in acquiring HIV infection from an infected partner as well as increased transmission from an infected woman to a non-infected partner, a ten-fold increase in the birth of a Down Syndrome baby in women users, and increased chances of death in children born to women users. Increase in the risk of breast cancer, cervical cancer including carcinoma-in-situ, in sub-groups of women are other life-threatening risks with Depo-Provera.

Upjohn company has deliberately suppressed and/or underplayed many of these serious life threatening complications thereby misleading both the Drugs Controller of India and the medical community. Many of these studies have been funded by Upjohn or directly carried out by their bio-statistical division. Given the large body of scientific information that already exists, going through the motions of another study as has been done as part of the post marketing surveillance, a study that has flouted all ethical and epidemiological norms, is an attempt to further mislead and misinform the concerned authorities.

We condemn this deliberate misrepresentation of information as unethical and strongly urge the Indian government to ensure that such hazardous drugs are not brought into the country. In addition to all the dangers mentioned above, the existing health infrastructure is not capable of providing the counselling and follow up that is mandatory for such long acting contraceptives We warn the Government against introducing either Depo Provera or Net-en, in any form into the family planning programme.

Population policies

The Government of India had announced its Population Policy 2000 recently, as well as set up a Population Control Commission. We believe this is a waste of public money and will serve no useful purpose. Whereas in response to the widespread opposition from different quarters, including women's organisations, the population policy 2000 gives up the earlier thrust on coercive disincentive policies, the Government still has an ambiguous and self contradictory stand towards disincentives. For example the Bill to prevent those with more than two children from standing for elections remains on the Government agenda. Equally disturbing is the trend of State Governments to announce population policies which are based on a system of disincentives which can only be termed as draconian. It would appear that in the era of liberalisation State Governments are directly negotiating with international funding agencies for loans which, as in the past

conditionalities for polulation control at any cost. For example the Maharashtra Government has announced that it will deprive the third child of rations through the PDS. This when children have been dying of malmitrition in the State. In Rajasthan, Madhya Pradesh and UP, the Governments have announced similar disincentives including denial of access to Government schemes, Government loans, Government jobs—in other words punishing the poor for their poverty. All the above State Governments along with Haryana and Delhi have also passed legislation denying the right to those with more than two children to stand for elections to panchayats and local bodies. Thus the Government has a self contradictory policy—it talks of target free- no disincentives regime—while at the same time it encourages State Governments to go ahead with such draconian measures. Either there is a national approach or there is not—in which case let the Population Commission be immediately wound up.

We would also like to know the status of the Indo-US collaborative agreement signed on "Contraceptive and reproductive health research" on Nov.28, 1997. Is the agreement being implemented by the present Government? We believe it is against the interests of Indian women.

We therefore demand;

1. A firm commitment from the Government of India not to introduce any type of long acting invasive hormonal contraceptives in the family planning programme.
2. Immediate intervention to ensure that policies declared by State Governments based on coercive disincentives, such as those quoted above, should be withdrawn.
3. No acceptance of post market surveillance studies financed and carried out by drug companies such as Upjohn's study on depo-provera. No permission for marketing the drug in India.
4. Details to be made available of the status of the 1997 agreement signed with the US Government on contraceptive research.

Signatories

Brinda Karat.

All India Democratic Womens Association, Jagori, Sama, Nirantar, Medico Friends Circle, Magic Lantern Foundation, WAMA (UP).