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Ref.No.MAIT/PY/2592

November 18, 2022

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Head (Registration)
Bureau of Indian Standards

**Subject: Amendments to the Bureau of Indian Standards (Conformity Assessment)-
Regulations, 2018- Industry views for proposed change of Standard Mark**

Respected Sir,

Greetings from MAIT!

We deeply appreciate BIS in sharing the draft Amendment document and for soliciting industry views.

Coming specific to industry views on the proposed amendments, industry is not in favour of the BIS' suggestion of substituting the Standard Mark for Scheme II products with a new mark. Kindly allow us to elaborate the reasoning of making the suggestion for non-deletion of the current safety self-declaration mark.

Industry strongly recommends BIS to carry out an impact assessment before rolling out any change. Just to give you a perspective on the impact that the proposed amendment with respect to the substitution of the safety self-declaration standard mark to the ISI standard mark will have on the industry please refer to the data available on the MeitY CSR portal (<https://www.crsbis.in/>):

- There are in total 63 product categories covered under the Compulsory Registration Scheme.
- The total number of registrations granted by BIS since the launch of the CSR scheme in 2013 till date is more than 35K.
- Out of these 35K registrations, more than 20K registration are currently active and would have the BIS standard mark printed on them.

If BIS proposes to change the standard mark, **it would greatly impact on the industry in terms of re-labelling all these ~20K operative registrations, affecting the entire supply chain.**

Two options are underlined for your consideration

Option 1: Continue with the present Standard mark (Most preferred)

Option 2: Changeover to new mark with additional time addressing industry concerns

Option 1:

Industry strongly believes that the BIS' proposal to substitute the standard mark with the ISI standard mark does not change anything in terms of product safety and neither does it add any value or change/influence the consumers' purchase decisions. Over the past 10 years, the Ministry of Consumer Affairs and BIS have put in a lot of efforts in creating public awareness around the BIS safety self-declaration mark. There have been so many above-the-line and below-the-line marketing campaigns carried out by BIS aiming towards widespread brand building exercise for its safety marks. However, all the public money invested and BIS' efforts made towards building the reputation for BIS Safety self-declaration mark would be

wasted if BIS scraps the existing standard mark and substitutes it with a new standard mark for Scheme II products. Hence, it is important for BIS to re-evaluate its amendment proposal

Option 2:

However, if BIS still decides to go ahead with the change although not recommended, MAIT suggests that all sustaining products should continue with the old safety self-declaration standard mark and the changes to be enforced only on new product(s) that will be registered in the future post the enforcement date of the draft amendment and no action should be taken on sustaining products which are already manufactured.

Please find below some additional industry suggestions on the timelines:

1. Most certification marks viz- KC (Korea), CCC/CQC (China), CE (Europe), NOM (Mexico), VDE, GS mark (Germany), RCM/C-Tick Mark (Aus/NZ), PSE (Japan), etc. do not require to mention the Standards on the Artwork as it is part of the test report, certificate and public listing. Mentioning the standard reference does not create any additional value for the end consumer as the consumer can always verify the standard from the BIS website. In addition, it occupies more space on the Artwork. BIS may simplify the proposed ISI mark with only the License number underneath and have no reference of Standard above the ISI mark in line with the global best practices.
2. Once the updated rules are enforced, we hope BIS will do wide publicity to educate the consumers and the public to avoid any misunderstanding/misgiving on the product itself.

The specific clause wise comments/suggestions are enclosed in **Annexure**.

We would urge BIS to continue using the present marking scheme. However, if BIS intends to go for Option 2, we request BIS to kindly consider the above genuine concerns & clarifications and also request to organise wider industry consultations before taking any final decision. Once all the concerns are addressed by BIS, a one-year transition timelines should be given to the industry from the date of the publication of the Gazette notification to enable Ease of Doing Business in the country. Hurried implementation of the updated scheme would lead to market and business disruptions and create impediments in the existing production and supply chains. We would be happy to engage with BIS for finalising the updated requirements for change of the Standard Mark.

Warm regards,



Col. AA Jafri, Retd.
Acting Director General, MAIT

CC: Shri Amitesh Kumar Sinha, IRAS, Joint Secretary, Ministry of Electronics & IT

CC: Shri Pramod Kumar Tiwari, IAS, Director General, Bureau of Indian Standards

CC: Smt. Asha Nangia, Senior Director, Ministry of Electronics & IT

CC: Smt. Chitra Gupta, DDG (Registration Dept.), Bureau of Indian Standards

ANNEXURE 1:- CLAUSE-WISE SUGGESTIONS

Clause	Draft amendment	Industry Submission
1 (2)	They shall come into force on the date of their publication in the Official Gazette except for the regulation 7(b) and 7 (c) of this amendment regulation which shall come into force after 6 months from the date of their publication in the Official Gazette	6 months is too short for the amendment in regulation, Industry requires at least 12-18 months from the date of the notification for a smoother transition and less impact on to supply chain
3	<p>In the said regulations, in sub-regulation (1) of regulation 11, the following clauses shall be inserted namely:-</p> <p>“(c) the licensee obstructs or purports to obstruct the Bureau (any member, officer or other employees of the Bureau or appointed agents or any other authority authorised for the purpose) in the discharge of the functions;</p> <p>(d) the licensee has submitted any fraudulent documents or information.”</p>	BIS should provide an opportunity and reasonable time to the licensee to respond to the notice before taking any action
4	<p>In the said regulations, in sub-regulation (1) of regulation 19, the following clauses shall be inserted, namely:-</p> <p>“(c)the holder of certificate of conformity obstructs or purports to obstruct the Bureau (any member, officer or other employees of the Bureau or appointed agents or any other authority authorised for the purpose) in the discharge of the function;</p> <p>(d) the holder of certificate of conformity has submitted any fraudulent documents or information”</p>	BIS should provide an opportunity and reasonable time to the licensee to respond to the notice before taking any action.