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July 21, 2023

Shri Rohit Kumar Singh, IAS
Secretary (CA)
Department of Consumer Affairs

Subject: Kindly refer meeting dated 20 July 2023 on the issue pertaining to the declaration of month and year of manufacture on the packaged commodities and request for appropriate amendments

Respected Sir,

Greetings from MAIT!

On behalf of the ICT and mobile industry, kindly accept our gratefulness for the positive interaction with the industry in the meeting held under your Chairmanship on 20th Jul' 23.

We sincerely appreciate your continuous strive to protect consumer interests, along with accommodating requests made by industry for providing flexibility in methodology and timeline, to make it happen in the largest interest of ease of doing business.

Salient Points discussed during the meeting held on 20 July, 2023 are as:

- **Permit flexibility to declare** month and year of manufacture **anywhere on the retail package, including but not only limited to through a QR code**. Kindly provide **exemption** from the **font-size requirement** for displaying the month and year of manufacture of the pre-packaged commodities and a general flexible requirement that the contents as per Rule 6 should be **clearly visible/readable with naked eye**.
- To implement the above stated flexibility, kindly **extend the timeline** for implementation of the Nov. 2021 amendment from **01 Sep' 23 to 01 Jan' 25**, to allow manufacturers/importers to smoothly, implement changes at their manufacturing, packaging facilities, and streamline all their global supply chain operations required for the implementation of the November 2021 Amendment.
- **Exclude “accessories” & “spare parts”** from the requirement of mandatory declaration of the month and year of manufacture as required by the Rule 6(1)(d) of the LMPC Rules by way of amendments to Rule 6(1)(d). Consider introducing a definition for “accessories” and “spare parts” of the products under the LMPC Rules.
 - **Exclude “non-serialised” accessories packed in bulk** as it is challenging to ascertain month and year of manufacturing for them.
 - **“Accessories”** may be defined under Rule 2 to mean ‘products that are complementary to the main/core product and support, or compliment or add-on to the usage of the main/core product, including spare parts and components, and can also be sold separately’.

- **“Spare parts”** means all parts or components which are used as a replacement to identical or functionally similar parts or components within a product.
- If the mandatory declaration of month and year of manufacture is required in **“accessories”**, we request you to permit flexibility to declare month and year of manufacture **anywhere on the retail package or on the product itself**.

Your kind consideration will go a long way in ease of doing business in the IT and electronic sector. We continue to ensure that the consumer's interest is protected.

We look forward to receiving positive consideration upon our requests!

Warm regards,



Col Suhail Zaidi (Retd)
Director General

CC: Ms. Nidhi Khare, Additional Secretary, Department of Consumer Affairs
CC: Shri Ashutosh Agarwal, Deputy Director, Department of Consumer Affairs