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Ref.No.MAIT/PY/2264

February 24, 2021

Shri Saurabh Gaur
Joint Secretary
Ministry of Electronics & IT

Subject: Request for extension of CRO V implementation for the product categories of Digital Cameras and Video Cameras

Respected Sir,

Greetings from MAIT!

This is in continuation to our earlier representation dated January 22, 2021 Ref. No. MAIT/PY/2254. Through this letter, we would like to draw your kind attention about the challenges faced by the industry while doing the compliance process under CRO Phase V.

Industry is fully aligned with the Government and understands that regulations are important and necessary for safety of the Indian consumers; we feel that it is equally important to put into consideration the minimum period of time required by the industry to address the operational challenges and comply with the regulation, which may be different for various product categories. The extremely tight deadline to the industry for compliance to CRO V, especially for the product categories Video Camera and Digital Camera, has left the industry extremely concerned.

CRO Phase V was notified on October 1, 2020 with an implementation date of April 1, 2021, giving the industry only 6 months for transition. In this regard, we would like to submit the following:

1. The clarification of series guidelines was published only in mid-November'20.
2. The Test Report Format was published only three months prior to the implementation date, i.e. January 6, 2020. Any delay in the TRFs further delays the rest of the process. This delay gave the industry practically just 3 months to start its process.
3. It is imperative to note that the registration process of products and lead time differs depending on whether the product contains battery / adaptor or not. Many new models having a new battery which is not registered with BIS need more time to complete the registration process. In general, the lead time to place the products in market that either does not have Adapter or batteries or have pre-approved Adaptors or battery is approx. 10 months and for products containing adaptor or battery (that are not pre-approved) is approx. 18 months. This is largely because of first cells must be tested & registered, then battery to be tested and registered and then the main products are tested with the registered battery & adapter to get the BIS registration.
4. Lead time for registration under CRO is also a challenge for the industry, and it also important to note that the further delay in getting the BIS certification has increased the lead time. Typically, registration process covers the following steps (lead time required for the steps is attached).
 - i) To study the notification and respective standard, conduct design change wherever required.

- ii) To study the series guidelines issued by MeitY and analysing the product line-up accordingly.
- iii) To select and further discuss with the BIS accredited test laboratory and raising test request to laboratory (post addition of such new product categories) on the BIS portal.
- iv) Testing of products and issuance of test report by BIS accredited laboratory
- v) Seeking BIS registration
- vi) Redesign of the Rating Label to accommodate the marking requirements & modification in the production process to incorporate the new label.
- vii) Shipping the compliant products to India for distribution through sales channels in the widespread geography of the country and finally reaching to end-customers.

5. Inclusion of Video Camera within the exemptions provided for Highly Specialized Equipment (HSE)

- Certain Professional equipment manufactured / imported in limited number (100 units per model per year) have been exempted from CRO as “Highly Specialized Equipment” (HSE) according to FAQ no.40 in CRO.
- The Video Cameras which are highly specialized and used by professional customers in a controlled environment such as broadcasting stations or film production companies, etc. not sold at retail shops in the market.
- The additional testing and registration cost for such highly specialized video cameras that are sold in small quantities for professionals is a huge burden.

We humbly request to exclude the “Highly Specialized Video Camera” within the scope of CRO, in a similar manner as FAQ no.40 in CRO as below:

- “Highly Specialized Video Camera defined as below are exempted from the application of the CRO:
- “Highly Specialized Video Cameras used by professionals (like broadcasting stations or film production companies, etc.) and are manufactured / imported in less than 100 units per model per year) are exempted from the application of the CRO”

In view of the above, MAIT requests your kind office for: -

- Extension in the implementation date of CRO V by 12 months’ time (i.e. from 1st April 2021 to 1st April 2022).
- Request to Remove Highly Specialized Professional Video Camera from the scope of the CRO V.

We look forward to your positive consideration towards our request.

With regards,



George Paul
Chief Executive Officer

CC: Ms. Asha Nangia, Sr. Director, Ministry of Electronics & IT
CC: Shri Saurabh Ranjan, Scientist “C”, Ministry of Electronics & IT