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May 25, 2023

Shri Rohit Kumar Singh, IAS
Secretary
Department of Consumer Affairs

Subject: Request for Industry Consultation & Extension on issue regarding declaration of month and year of manufacture on the packaged commodities

Respected Sir,

Greetings from MAIT!

This bears reference to the meeting held on 24th May 2023 under your chairmanship regarding declaration of month and year of manufacture on the packaged commodities.

At the outset, we thank you for inviting MAIT to deliberate upon the LM rules. MAIT appreciates the efforts of the DoCA to hold consultation with the industry yesterday.

Thank you for recognizing the view points of the industry in support of the required flexibility of displaying the month and year of import/pre-packing. Only yesterday, the industry was apprised of the specific concerns that necessitate making date of manufacturing available to consumer (possible misuse of the flexibility to display Month and Year of Packaging by re-packaging refurbished/spurious products and accessories). While this is a legitimate concern that we share, however, in view of the complexities of global supply chains including logistics, ability to compete efficiently in the market and to ensure ease of doing business it is important that the industry is provided sufficient time to come up with possible solutions which will balance the requirements of all stakeholders. It goes without saying that the date of manufacturing is being printed on the label and is made available to the consumers to the extent possible, however, owing only in specific instances the companies provide the date of packaging/date of import.

It would be important for us to highlight/emphasize that the window for extension of “Legal Metrology (Packaged Commodities) Amendment Rules, 2021 vide GSR 779(E) dated 2nd November 2021” is expiring on 31st May, 2023 & in this short time, it would not be logistically possible to align global supply chains to the proposed change.

Sir, we had discussed the issue with MeitY and the industry has been informed that MeitY supports the view that mentioning there needs to be flexibility in mentioning Month and Year of Packaging/Import/Manufacture.

We have also had intense deliberation within the electronic industry and with the automobile industry, both of whom feel that providing this flexibility will reinforce ease of doing business without compromising on consumers' interest.

Industry Request:

1. While we are deliberating internally upon the modalities to be compliant with the updated rules, we humbly request you **to grant Extension of Legal Metrology (Packaged Commodities) Amendment Rules, 2021 for a period of one year.**
2. **We would also request for a consultation on this matter, so that an amicable solution can be arrived at.**
3. **In this regard, we would request for an urgent meeting with you on 26th May, 2023 (Friday) at a time of your convenience.**

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.

Warm regards,



Col. AA Jafri, Retd.
Director General