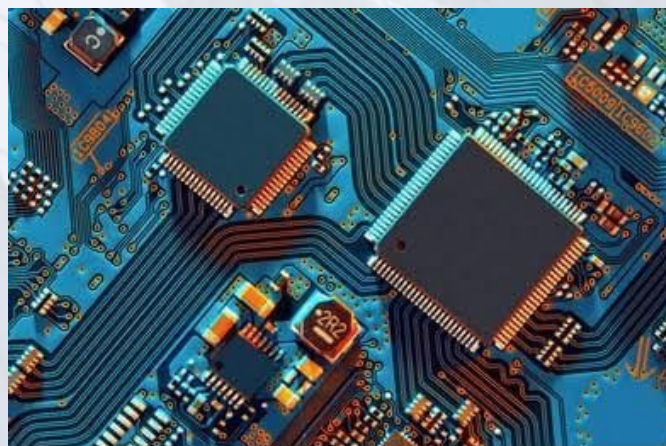




Outcome Report

Roundtable on Compulsory Registration Order (CRO)



December 12, 2023 | New Delhi

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KEY HIGHLIGHTS:

MAIT, in collaboration with the US-India Strategic Partnership Forum (USISPF), unveiled a comprehensive report on the Compulsory Registration Order (CRO) during a Roundtable held at Hotel Royal Plaza in New Delhi on December 12, 2023. The event shed light on the positive advancements brought about by CRO, including streamlined registration processes and enhanced online documentation for the electronic industry. Noteworthy discussions included the evolution of CRO with multiple noteworthy initiatives taken by the government along with acknowledgement of areas for potential development and enhancement of CRO.

Mr. Afaq Hussain, Director, BRIEF (Bureau of Research on Industry and Economic Fundamentals), research partner for the report, presented the methodology and key findings during the meeting. The presentation outlined the research process, shedding light on the gaps identified in the Compulsory Registration Order (CRO) through interactions with stakeholders. He emphasized the imperative need for improvement

based on these insights, providing a comprehensive overview of the positive impact that CRO has had on the economic landscape of India.

While acknowledging the positive developments, MAIT emphasized that CRO could offer a fresh perspective on easing business operations and potentially removing hindrances. **Expressing gratitude, MAIT extended thanks to BIS** for their instrumental role in parallel testing and ongoing efforts to expand these practices to all applicable categories. The report also delved into consumer perceptions towards the safety in the electronics sector. A lively discussion followed, featuring key stakeholders from the electronics industry, including experts from mobile, printing, digital imaging, and automation sectors.



SOME IMPORTANT POINTS EXPRESSED AND RAISED DURING THE ROUNDTABLE INCLUDE:

Mr. Dinesh Chand Sharma, Director – Standardization, Policy and Regulation, SESEI advocated for a unified approach to testing standards. He emphasized the necessity of harmonizing different standards of testing. Recognizing the proactive role of BIS (Bureau of Indian Standards), Mr. Sharma stressed the importance of establishing a single, universally accepted standard of testing.

Mr. Cristiano Masini, Coordination Conformity Assessment, Legrand acknowledged the increasing focus on safety of electronics in India as a positive development. He also advocated for reducing certification time and costs to enhance

market efficiency and competitiveness in India besides highlighting the importance of aligning Indian standards of testing with international standards for global recognition of Indian laboratories.

Dr Gopal Nadadur, VP, Asia Group focusing on investor perspectives, highlighted the significant investment opportunities in India, driven by geopolitical factors, particularly in the context of the evolving dynamics between China and the US-India partnership. He also pointed out the importance of policies aimed at attracting investments, emphasizing the need for reduced logistics and the challenges posed by alternative countries such as Vietnam, Malaysia, and Mexico. Dr Gopal emphasized the attractiveness of India's large domestic demand and underscored that stability in the business environment, coupled with ease in product registration, as crucial for investors. He noted that investors are keenly observing timelines as they plan their business strategies, seeking information on the trajectory of these crucial aspects.

Ms. Pooja Vijayvargiya, Associate Partner, Lakshmikumaran & Sridharan spoke about doctrine of proportionality as a ground for any legislative action which says that every legislation should be backed by a purpose and that legislation must be in proportion of that purpose. She quoted several Supreme Court judgements in support of her argument. In the case of CRO, the purpose is Consumer Protection & legislation is CRO/BIS Act and hence, should not be disproportionate. She appreciated the intent behind CRO but suggested implementation to be in line with the purpose so as there is no excessive burden on the industry.

POINTS OF DISCUSSION FROM THE KEY INDUSTRY STAKEHOLDERS:

During the Roundtable on Compulsory Registration Order (CRO), key industry stakeholders engaged in crucial discussions addressing pertinent issues faced by the electronic industry. **The first noteworthy** concern raised pertained to the family series guidelines established in the CRO, some of which were identified as causing hindrances, increasing costs, and elongating the registration process, consequently leading to delayed product launches in the Indian market. Stakeholders emphasized the necessity for a unified global standard for testing to streamline processes across borders. **A second key point** centered on the time-intensive nature of the registration process, despite the government's efforts to digitize it. Stakeholders acknowledged the progress but urged further reduction in documentation and paperwork to expedite the process.

The third focal point involved simplifying multiple testing requirements for international brands and the registration of multiple factories. Stakeholders advocated for brand certifications rather than factory-oriented certifications, addressing concerns related to sampling testing and its associated time commitments. Addressing the improvement of business processes, they suggested enhancing the ease of doing business. The current dual verification system involving both **BIS and MEITY** for products from foreign factories tends to prolong approval timelines at BIS. To streamline processes, the speakers proposed to adopt a single testing approach, considering a generic scheme for similar products with potential aesthetic variations. This strategy would reduce duplication of and simplify the overall approval process.

The fourth crucial point underscored the demand for waiving customs duty on the sampling testing process to enhance cost efficiency and alleviate the economic burden on the industry, consequently reducing E-waste post-testing. The stakeholders collectively stressed that additional reforms, aligned with the report's findings and discussions, were imperative.

In response to these concerns, the ministry representative from MeitY, Ms. Asha Nangia, acknowledged the industry's challenges and apprised them of the initiatives undertaken by CRO. She assured stakeholders that the report's key findings would be duly considered to enhance the CRO process, particularly focusing on exploring a customs duty waiver to facilitate efficient business operations.

Ms. Asha Nangia, Sr. Director & GC, MeitY encouraged MAIT and industry representatives to communicate their concerns formally, fostering a collaborative effort to address these challenges and refine the CRO procedures for the benefit of the electronic industry.

The meeting concluded with a vote of thanks expressing gratitude for the collaborative efforts of industry experts, MAIT, US-India partnership, the government, and the research partner BRIEF (Beaure of Research on Industry and Economics fundamentals). The event emphasized the importance of continued collaboration to address challenges and promote the sustainable growth of the electronic industry in India.



List of Participants:

S. No.	Name	Designation	Organisation
1	Ms Asha Nangia	Scientist G & Group Coordinator	Ministry of Electronics & IT
2	Dr Bharat Yadav	Scientist E	Ministry of Electronics & IT
3	Mr. Saurabh Ranjan	Scientist D	Ministry of Electronics & IT
4	Ms. Aurosmitta Kabiraj	Scientist D	BIS
5	Ms. Sonali Gupta	Scientist B	BIS
6	Col. Suhail Zaidi	Director General	MAIT
7	Mr. Supratim Chatterjee	PhD, Economic Specialist (Technology and Trade), Econ Section	Embassy of the United States of America
8	Mr Uday Wadhwa	Assistant Manager	Invest India
9	Mr Afaq Hussain	Co-Founder & Director	BRIEF
10	Dr. Arpita Mukherjee	Professor	ICRIER
11	Mr Dinesh Chand Sharma	Director - Standardization & Public Policy	SESEI
12	Mr Cristiano Masini	Coordination Conformity Assessment	Legrand
13	Ms Pooja Vijayvargiya	Associate Partner	Lakshmikumaran & Sridharan
14	Mr Gopal N.	Vice President	Asia Group
15	Ms Amiya Mehra	Director	USISPF
16	Ms R Krishnamurthy	Associate	USISPF
17	Mr Tabrez Ahmad	Group Director - Govt. Affairs	Dell International Services India
18	Mr A Prem Ananth	Head of Product Compliance & Environmental Affairs (India)	Dell International Services India
19	Mr Prabhat Bhattacharya	Senior Advisor, Government Affairs	Dell International Services India
20	Mr Rajender Saini	Manager - Regulatory Affairs	Dell International Services India
21	Mr Ramesh Karwani	Head-Technology Policy & Regulation	IBM India
22	Ms Manjri Gopalan	Head - Regulatory Policy, India	HPE
23	Mr Saurabh Nag	Dy. General Manager	Samsung India Electronics
24	Ms. Anjini Bist	Manager, Public Affairs	Samsung India Electronics
25	Mr Sanchit Baijal	Compliance Manager	CISCO Systems
26	Ms Mayuri Simaria Jain	Technical Regulation Standards Engineer & Program Manager	HPI
27	Mr Sudhir Zutshi	Director-Policy & Strategy	UL Solutions
28	Mr Rohit Singh	Program Manager - India Market Access	UL Solutions
29	Mr Umakant Vasishth	GM & Head - Product Safety, Environment Compliance and Parts Supply chain management	Sony India



PHD House, Ramakrishna Dalmia Wing
4th Floor, 4/2, Siri Institutional Area,
August Kranti Marg, New Delhi 110 016, India

About MAIT:

MAIT is India's apex electronics Industry association representing the IT, Mobile, Datacom, Consumer Electronics, White Goods, Industrial Electronics, and Services subsectors of the Electronics industry. MAIT is recognised by both the Government, as well as the industry for its role in the growth and development of the Electronics industry.



2550 M St NW
Washington, DC 20037, USA

About USISPF:

The US-India Strategic Partnership Forum's (USISPF) mission is to build, enable, advocate, and facilitate partnerships between the United States and India by providing a platform for all stakeholders to come together in new ways that will create meaningful opportunities with the power to change the lives of citizens in both countries.