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August 07, 2023

Ms. Chitra Gupta
Scientist F & DDG (FMC, HM & Registration)
Bureau of Indian Standards

Subject: Conversion of the current Pilot scheme of Parallel testing into a permanent provision

Ref:

1. Registration/Guidelines RG: 01 dated 12 Jun 2023
2. Registration/Guidelines RG: 01 dated 19 Dec 2022

Respected Madam,

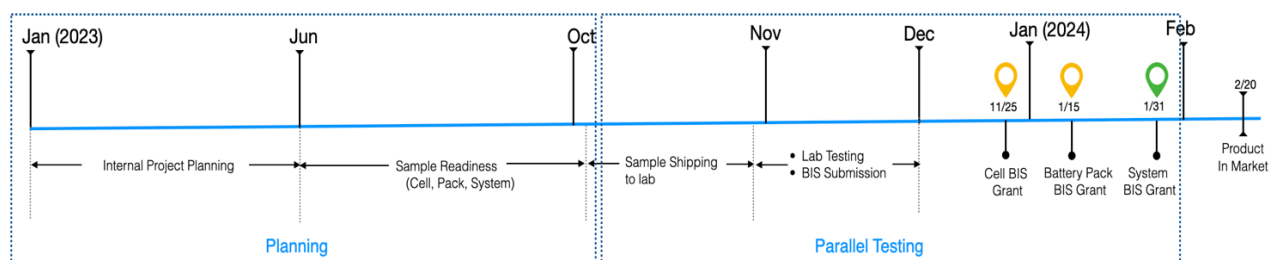
Greetings from MAIT!

We would like to thank BIS for addressing the industry's request for the introduction of Parallel Testing for CRO products. The recent BIS circular on extending the scheme by 6 months and the addition of three other product categories is a step in the right direction. We are also appreciative of BIS for taking the effort and taking out time to conduct a Webinar to disseminate information to different stakeholders on the scheme.

Problem statement:

OEMs typically plan their testing and certification schedules keeping in consideration a host of factors - Product design roadmap; supply chain; manufacturing capabilities; shipment of samples; coordinating with sub-vendors; marketing launch plans, etc. In the current format, the Parallel scheme places a dilemma on OEMs as to which procedure to avail - Parallel or Sequential as the testing and certification schedules ride on a host of factors.

The schematic below shows a parallel testing and certification scenario:



As you can see from the above typical scenario, if a Brand/OEM has to avail of the parallel testing provision, it has to prepare a year in advance. The six months' timeframe places a constraint in fully availing the provision provided by BIS under the existing pilot parallel rules.

Request:

Going forward, we would sincerely request BIS to convert the pilot Parallel scheme into a permanent provision for Testing and certification. During the Webinar, these aspects were also highlighted by the industry.

Advantages:

1. It would be another feather in the cap for BIS as your esteemed organisation would take another momentous step towards the Ease of Doing Business in line with the Government of India's thrust on EoDB.
2. OEMs can plan their testing and certification schedules by availing of either of the options - Sequential or Parallel. The permanent Parallel testing provision will mean that OEMs can opt for the best approach for the testing of their products as per their specific needs and programs with clear visibility of the requirements.

We would urge BIS to kindly let **OEMs avail of the Parallel Testing procedure on an ongoing basis similar to Sequential Testing so as to allow OEMs to avail the preferred schemes. The necessary notification could be issued at the earliest possible timeframe to let the industry get prepared well in advance.**

We look forward to your support on this matter.

Warm regards,



Col Suhail Zaidi (Retd)
Director General

CC: Shri Pramod Kumar Tiwari, IAS, Director General, Bureau of Indian Standards
CC: Shri S.K. Dutta, Head-Registration, Bureau of Indian Standards