



PHD House, 4th Floor, Ramakrishna Dalmia Wing  
4/2, Siri Institutional Area, August Kranti Marg, New Delhi – 110016,  
Tel# 9599665859 E-mail: [ajafari@mait.com](mailto:ajafari@mait.com) Website: <http://www.mait.com>

Ref.No.MAIT/PY/2617

January 03, 2023

Shri Pramod Kumar Tiwari, IAS  
Director General  
Bureau of Indian Standards

**Subject: Industry feedback on Draft Amendments to BIS (Conformity Assessment)  
- Regulations 2018 with respect to unification of Standard Marks**

Respected Sir,

***Greetings from MAIT!***

We thank BIS for organising the stakeholder meeting and soliciting industry views on unification of the standard marks. We appreciate BIS for giving MAIT an opportunity to share our members' concerns and recommendations. As we highlighted during the meeting, we hereby submit our feedback on BIS' proposal on unification of standard marks for your kind perusal.

Industry appreciates the efforts taken by BIS over past several years in publicising and making consumers aware of the importance of procuring BIS self-declaration marked products. All these years of hard work has finally started paying off as consumers have started recognising the safety marks on the product. However, with the recent proposal of substituting the safety self-declaration mark with ISI mark, we fear all these public money invested, and BIS' efforts made towards building a reputation for its Safety self-declaration mark would be wasted. The substitution of the safety self-declaration mark with the ISI standard mark **is just a cosmetic change and does not change anything in terms of the product safety** and neither does it add any value or change/influence the consumers' purchase decisions. Hence, we strongly recommend BIS to re-evaluate its amendment proposal.

If BIS still wishes to go ahead with unification of the standard marks, although not recommended, MAIT would like to list out some of the major challenges that we foresee and submit some recommendations to overcome these issues. We humbly request your good offices to kindly reconsider our proposal while making the amendments to the BIS Conformity Assessment Rules 2018.

- **Industry Challenge: Timing of unification of the standard marks:**

- As you are aware, MeitY has already initiated industry consultations on migration to new Safety Standard (IS 62368-1, 3<sup>rd</sup> edition), and it is expected to be announced anytime soon. Whenever the migration to new safety standard would happen, all products covered under IS 13252 and IS 616 would require retesting and recertification. With recertification, the R-numbers will be updated and would require relabelling of all the active products.
- Simultaneously, BIS is also in the process of unifying the standard marks which means all the products covered under Compulsory Registration Scheme (CRS) would require relabelling.

- This dual labelling exercise would have a huge administrative burden on the industry and would impact the ease of doing business immensely.

**Recommendation:**

- We recommend BIS to align the implementation date of its unification of the standard mark requirements with MeitY's enforcement date of new safety standards. This way industry would not be forced to undertake the re-labelling exercise twice.
- **Industry Challenge: Immense administrative burden due to the unification of standard marks:**
- We understand, there are in total 63 product categories covered under the CRS. The total number of registrations granted by BIS since the launch of the CSR scheme in 2013 till date is more than 35K. Out of which, we assume approx. 20K registrations would be currently active and would have the BIS safety self-declaration standard mark on the products. With the unification of the standard marks, the industry would have a huge administrative burden in terms of relabelling all these ~20,000 operative registrations, affecting the entire supply chain.

**Recommendation:**

- We request BIS to allow all the sustaining products (which have already been registered) to continue with the existing safety self-declaration standard mark. The transitioning to the ISI standard mark be enforced only on new product(s) that will be registered post the enforcement date of the draft amendment. No action to be taken on sustaining products which are already manufactured and registered.
  - Alternatively, we request BIS to give a minimum of 1 year implementation time for the industry to comply with the amendment. Also, during this period, BIS may allow concurrent running of the two standard marks.
- **Industry Challenge: Relabelling of the products which have reached end of life (EOL) before the enforcement date of the amendment:**
- The OEMs support legacy IT equipment running some of India's most critical infrastructures. Majority of the IT products' end-of-life varies between 5 to 10 years depending upon the customers' service support needs. The OEMs have a legal obligation to provide support to the customer even after the product reaches the end of their manufacturing and sales life. Making any change in the regulatory labels of such end-of-life products is not possible.

**Recommendation:**

- We strongly recommend BIS to exempt the products which have reached end-of-life before the enforcement date of the amendment rules. A similar kind of exemption has been given by the Telecom Engineering Centre (TEC) for products covered under the Mandatory Testing and Certification of Telecom Equipment (MTCTE) regulation. A copy of the TEC order is enclosed with this representation for your kind reference.

- **Industry Challenge: Reference of the standard number along with the mark:**

- Most certification marks across the world viz. KC (Korea), CCC/CQC (China), CE (Europe), NOM (Mexico), VDE, GS mark (Germany), RCM/C-Tick Mark (Aus/NZ), PSE (Japan), etc. do not require to mention the Standards on the Artwork as it is part of the test report, certificate and public listing. For that matter, within India, neither does TEC's certification scheme - MTCTE, require the reference of the standards on the artwork. Mentioning the standard reference does not add any value for the end consumer as the consumer can always verify the standard from the BIS website. In addition, it occupies more space on the Artwork.

**Recommendation:**

- BIS should simplify the proposed ISI mark with only the Registration number underneath and no reference to the Standard above the artwork in line with the global and national best practices.

We request BIS to kindly consider the above genuine concerns & recommendations before finalising the draft amendment. We would be happy to engage with BIS for finalising the updated requirements for change of the Standard Mark.

Warm regards,



Col. AA Jafri, Retd.  
Director General

CC: Ms. Asha Nangia, Sr. Director, Ministry of Electronics & IT

## TEC EXEMPTION FOR END-OF-LIFE WHOLE UNIT WARRANTY REPLACEMENTS

Government of India  
Telecommunication Engineering Centre  
( Department of Telecommunications )  
K. L. Bhawan, Janpath, New Delhi-110001

File No.: 6-6/2021-TC/TEC(Pt. II)

Dated: 16.11.2022

### Clarification


**Subject: Clarification regarding End of Life / End of Sale whole unit warranty replacement products under Mandatory Testing & Certification of Telecom Products ( MTCTE )**

With reference to the above cited subject, it is clarified that the models of the products of Phase III & IV under MTCTE which are declared as End-of-Life / End-of-Sale for whole unit warranty replacement by the Original Equipment Manufacturers (OEMs) before the mandatory certification date i.e. 01-07-2023 are not covered under MTCTE regime.

2. However, the OEMs shall provide the list of such products (as per annexure attached) which has been declared as End-of-Life / End-of-Sale for whole unit warranty replacement to TEC on email: [help.mtcte.tec@gov.in](mailto:help.mtcte.tec@gov.in)

The list of Phase-III and IV products is available on MTCTE portal <https://www.mtcte.tec.gov.in>

This issues with the approval of Competent Authority.

  
16-11-2022  
( Anand Katoch )  
Director( TC -I )  
Email: [dir.ta.tec@gov.in](mailto:dir.ta.tec@gov.in)