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November 28, 2019

Shri H J S Pasricha
Deputy Director General
Bureau of Indian Standards
Manak Bhavan, 9 Bahadur Shah Zafar Marg,
New Delhi-110002

Sub: Request for extension of Registration deadline for Secondary Cells and Batteries till 31st Dec'2020.

Respected Sir,

At the outset, **Manufacturers Association for Information Technology (MAIT)** would like to thank Bureau of Indian Standards (BIS) for extending its guidance & support from time to time to the industry during compliance under CRS order 2012.

We also acknowledge with thanks to BIS for issuing the revised FAQs dated 14th November 2019 regarding issues pertaining to battery registration.

As our members discussed with you, we would like to draw your kind attention for an urgent issue of meeting the deadline of 14th Mar'20 for the registration of **Secondary Cells and Batteries for portable applications**. The process for registering the battery is significantly long, starting from Cell testing, Cell registration, integrating the same into battery, and then getting battery tested & getting the battery registration done from BIS, which itself takes around 46 weeks. After receiving the battery registration, the factory will start the battery labelling & integrating the same with the host/main product & shipping the same to India, which takes around another 30 weeks.

Keeping in view the long global supply chain from procurement of components to making the finished product in order to meet the demands of different countries, **factories plan their production at least 6 months in advance & are likely to stop the production, if they foresee any bottleneck to ship the final products. We are enclosing the steps involved during registration of Secondary cells & Batteries as Annexure 1.**

As per the timelines stated above & the challenges stated above, it is currently looking impossible for the industry to meet the deadline of 14th Mar'2020 & therefore **we request you to extend the deadline for the battery registration till 31st Dec'2020.**

In order to meet the demand of our customers comprising Government/PSUs & large corporate customers & for Ease of Doing Business (EOBD) in the country, we sincerely look forward to your kind consideration to our above stated request.

With warm regards,

George Paul
Chief Executive Officer



Annexure-1

Steps involved for secondary Cell/ battery registration: -

Total no. of batteries are 2500+

- | | | |
|--|---|-----------|
| 1. Cell Sample transportation & submission to lab.
2. Application for Cell testing.
3. Getting lab report for Cells. |) | 12 weeks |
| 4. Apply for Cell certification.
5. Receiving Cell certification. |) | 10 weeks. |
| 6. Shipping Battery with BIS registered cells.
7. Application for Battery testing.
8. Getting lab report for Battery. |) | 14 weeks |
| 9. Apply for Battery certification.
10. Receiving Battery certification. |) | 10 weeks. |
| 11. Arranging Battery labeling.
12. Shipping compliant batteries.
13. Shipping host product with compliant batteries.
14. Shipment time for India |) | 30 weeks |