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Ref.No.MAIT/PY/2254

January 22, 2021

Shri Saurabh Gaur
Joint Secretary
Ministry of Electronics & IT

Subject: Request for Extension in the Date of Implementation of CRO V for Product Categories of Digital Camera and Video Camera

Respected Sir,

Greetings from MAIT!

We would like to thank MeitY for all the facilitation and co-operation in accommodating the concerns of industry from time to time and providing much needed support in the roll-out of Compulsory Registration Order (CRO), 2012 and the phases thereafter.

We would state emphatically that industry is aligned with MeitY's objective to prioritize consumer safety in India & has taken requisite steps necessary to meet all compliances since the inception of CRO 2012 in the country with singular attention and commitment.

Through this representation, we would like to bring to your notice a matter of utmost urgency i.e., CRO Phase V, which has been notified on 1st Oct 2020 with an implementation date of 1st April 2021 - in this regard; we would respectfully submit the following:

- The CRO registration is a multi-step process that takes time, therefore MeitY granted more than 1 year time for change over in previous phases.
- In the category of Cameras, no other nation has a similar certification and hence all major brands have to develop in their supply chain the ability to adopt this India-specific standard.
- **The procedure of registration of products that contain battery/adaptor is a two-step process.** Many new models having a new battery which is not registered with BIS, need more time to complete the registration process. In general, the lead time to obtain registration for products without Adapter or batteries is approx. 6 months and for products containing adaptor or battery is approx. 15 months. This is largely because of first cells must be tested & registered, then battery to be tested and registered and then products are tested with the registered battery and then get BIS registration.
- **Exemption of Highly Specialized Video Camera for professionals from the Scope of CRO**

Certain Professional equipment manufactured / imported in limited number (100 units per model per year) have been exempted from CRO as "Highly Specialized Equipment" (HSE) according to FAQ no.40 in CRO.

The Video Cameras which are highly specialized and used by professional customers in a limited number of environments such as broadcasting stations or film production companies, etc. not sold at retail shops in the market. Therefore, unlike mass-produced consumer products, it has low risk for consumer safety. The additional testing and registration cost for such highly specialized video cameras that are sold in small quantities for professionals is a huge burden.

We humbly request to exclude the “Highly Specialized Video Camera” within the scope of CRO, in a similar manner as FAQ no.40 in CRO as below:

“Highly Specialized Video Camera defined as below are exempted from the application of the CRO:

“Highly Specialized Video Cameras used by professionals (like broadcasting stations or film production companies, etc). and are manufactured / imported in less than 100 units per model per year) are exempted from the application of the CRO”

In view of the above, MAIT humbly submits the request for

1. The deferment of the implementation of CRO V for the product categories of Digital Camera and Video Camera by at least 6 months; in case the industry still faces challenge, come back at the end of four months.
2. Removal of Highly Specialized Professional Video Camera from the scope of the CRO.

Looking forward to your positive consideration towards our request.

With regards,

A handwritten signature in black ink, appearing to read "George Paul", written in a cursive style.

George Paul
Chief Executive Officer