

# VOICE OF FICCI



## SHAPING THE AGENDA

October 2022



From the  
Director General

The Government has announced Production-Linked Incentive Scheme across 14 key sectors, including automobiles and auto components, white goods, pharma, textiles, advance chemistry cell and speciality steel, to create national manufacturing champions.

Taking this further, FICCI has submitted recommendations to the Department for Promotion of Industry and Internal Trade to extend the scheme to the furniture sector. Citing that PLI, in case of modular furniture, could be a game changer for furniture sector, FICCI has suggested that PLI in this sector will attract large players to establish world class furniture manufacturing units in India to cater domestic as well as global demands. Notably, Indian furniture market is estimated at USD \$10-12 billion and PLI Scheme combined with FDI policy will help flow of capital in this industry.

Further, the Federation has also requested for extension in delivery timelines for Electronics and IT Hardware products. Government e-Marketplace (GeM) has revoked the advisory regarding the extension of delivery timelines recently. The new deadline for delivery has been set at 15 days. However, the global shortage of components critical to the production of several IT and telecom products continues. Given the current shortage of components such as semiconductors, ICs and panels the new delivery timeline of 15 days is proving to be insufficient. In view of the same, FICCI ICT committee submitted its request for extension in delivery timelines for Electronics and IT Hardware products to GeM.

Also, FICCI has urged for an extension in last date of accepting the comments on the Draft Indian Telecommunication Bill, 2022. The industry is of the opinion that considering the Ease of Doing Business perspective, such draft bill needs a wider consultation before notifying it. This was submitted to Chairman, DCC & Secretary (Telecom), Department of Telecommunications, Ministry of Communications.

The above were some of the major recommendations and suggestions submitted by FICCI in this month.

Arun Chawla

### PLI for furniture industry

Indian furniture market is estimated at ~\$10-12 billion. Rising aspirations, growing middle class, rapid urbanisation, etc will expand the demand on furniture in near future. PLI Scheme combined with FDI policy will help flow of capital in this industry. As India is importing furniture of value ~\$2 billion, PLI will help in increasing high quality domestic production of furniture resulting in lower imports. It shall also promote export of furniture from India. Top global furniture players are keen to source from India. PLI will attract large players to establish world class furniture manufacturing units in India to cater domestic as well as global demands. This will help us to achieve scale of operations and lead a way for self-reliance of this industry as well as employment generation. Presently, furniture industry is majorly operated under unorganised industry. However, it has a promising future as demand for modular furniture is resurging globally on account of rise in need of modular, compact and luxury modular furniture which utilises minimum area, is available readily, has variety, saves space and is easy to install. Production Linked Incentive Scheme ('PLI') for modular furniture could be considered which could be a game changer for furniture sector. These recommendations were submitted to DPIIT.

For detailed recommendation, please write to  
*Ms Mousumi Ghose at mousumi.ghose@ficci.com*

### FICCI Inputs for 16th Meeting of All India Customs Consultative Group

FICCI had submitted inputs for the 16th Meeting of All India Customs Consultative Group (CCG) broadly on the issues related to MOOWR, Certificate of Origin, Duty Drawback, Challenges in Faceless Assessment and other customs related issues to the Directorate General of Export Promotion.

For detailed recommendation, please write to  
*Ms Pragati Srivastava at pragati.srivastava@ficci.com*

### Request for extension in delivery timelines for Electronics and IT Hardware products

GeM has revoked the advisory regarding the extension of delivery timelines recently. The new deadline for delivery has been set at 15 days. However, the global shortage of components critical to the production of several IT and telecom products continues.

Given the current shortage of components such as semiconductors, ICs and panels the new delivery timeline of 15 days is proving to be

*'Voice of FICCI' is a service to all our members and shared with key policy makers and thought leaders. The document is a compilation of FICCI's views on macro-economic issues. These issues come to us directly from members, or through deliberations in conferences and seminars on sectoral issues, as also through Government notifications.*

insufficient. In view of the same, FICCI ICT committee submitted its Request for extension in delivery timelines for Electronics and IT Hardware products to GeM.

For detailed recommendation, please write to  
*Ms Sarika Gulyani at sarika.gulyani@ficci.com*

### **Inputs for 5th Joint Trade Sub-Commission (JTSC) meeting with Vietnam at Secretary/Vice-Minister level scheduled to be held in November/December 2022**

FICCI shared Indian Industry inputs received for 5th Joint Trade Sub-Commission (JTSC) meeting with Vietnam at Secretary/Vice-Minister level scheduled to be held in November/December 2022 to the Under Secretary, FT(ASEAN), ESCAP & EP(Pharma), Department of Commerce.

For detailed recommendation, please write to  
*Mr Gaurav Vats at gaurav.vats@ficci.com*

### **Representation on exemption of warehouse operating in NCT of Delhi from sections 15 and 16 under Delhi's Shops & Establishment Act 1954**

Exemption of warehouse operating in NCT of Delhi from section 15 and 16 under Delhi Shops and Establishment Act 1954 wherein under 'Establishment etc.' after the existing entry at serial no. 269, the entry 270 (Warehouses in NCT of Delhi) shall be added in the Schedule-1. By exempting warehouses from sections 15 and 16 under Delhi's Shops & Establishment Act 1954, GNCTD has enabled effective functioning of the e-commerce and logistics sectors, boost in consumption, and increase in employment opportunities. Need to ensure that the interpretation on ground is uniform for effective implementation of the exemption. The Dept must strive to communicate to the district officers that all storage facilities involved in the overall supply chain of e-commerce operations are exempted, may they be large warehouses or smaller warehouses/dark stores. These were submitted to Chief Inspector (Shops & Establishments) & Additional Labour Commissioner, Office of the Commissioner (Labour), Government of NCT of Delhi.

For detailed representation, please write to  
*Ms Leena Jaisani at leena.jaisani@ficci.com*

### **Representation post meeting of industry members with Ministry of Consumer Affairs regarding amendments in Legal Metrology Act**

FICCI discussed the amendments related to the Legal Metrology (General) Rules, 2011 towards ease of doing business & sent a representation post the meeting that encapsulates proposals like - (a) Reconciling the proposed amendment with sector specific regulatory requirements and balancing the objective sought to be achieved with the critical need to protect confidential/proprietary information of manufacturers (b)The prime constituent in a product may or may not be its unique selling point (c)Avoiding adopting a one-size-fits-all approach etc. FICCI is keen to support drafting of the notification to iron out ambiguities in the draft amendment. We assure that the drafting will be fair and will take both business and consumer interests into consideration. These were submitted to Deputy Director (Legal

Metrology) & I/c Director, Legal Metrology, Department of Consumer Affairs, Ministry of Consumer Affairs, Food and Public Distribution, Government of India.

For detailed representation, please write to  
*Ms Leena Jaisani at leena.jaisani@ficci.com*

### **Request for extension in last date of accepting the comments on the Draft Indian Telecommunication Bill, 2022**

The industry is of the opinion that considering the Ease of Doing Business perspective, such draft bill needs a wider consultation before notifying it. Additionally, in order for the sector to scale up and meet the expectations of all stakeholders, including citizens, and the government, the department is humbly requested to conduct a wider consultation on the draft Indian Telecommunication Bill, 2022 and to extend the time for doing so. This was submitted to Chairman, DCC & Secretary (Telecom), Department of Telecommunications, Ministry of Communications, Government of India.

For detailed representation, please write to  
*Ms Leena Jaisani at leena.jaisani@ficci.com*

### **Request for extension in last date of accepting the comments on the 'Discussion Paper on Charges in Payment Systems' 2022**

The industry is of the opinion that considering the rules and procedures for levying charges in different payment systems, such discussion paper needs a wider range of consultation before notifying it. Additionally, in order for the sector to scale up and meet the expectations of all stakeholders, including citizens, and the government, the department is humbly requested to conduct a wider consultation on the Discussion Paper on Charges in Payment Systems', 2022 and to extend the time for doing so. This was submitted to Chief General Manager, Department of Payment and Settlement Systems, Reserve Bank of India.

For detailed representation, please write to  
*Ms Leena Jaisani at leena.jaisani@ficci.com*

### **Request on eligibility to get stickering done at Factory on-site premises instead of CBW's in case of AEO Tier 2 Entities**

Direction on the matter of whether a company with AEO (Authorized economic operator) is eligible to have stickering done on-site at the factory rather than in a custom-bonded warehouse (CBW). As per section 18 of legal metrology act (snipped below for your reference), no company is allowed to import any material without proper labelling which should contain net quantity, date, MRP etc. However as per conditions on customs circular 33/2016-Customs (attached), one of the benefits that is provided to company is 'They will be given facility to paste MRP stickers in their premises'. These were submitted to the Deputy Director (Legal Metrology) & I/c Director, Legal Metrology, Department of Consumer Affairs, Ministry of Consumer Affairs, Food and Public Distribution, Government of India.

For detailed representation, please write to  
*Ms Leena Jaisani at leena.jaisani@ficci.com*

### **FICCI Representation on G.S.R. 448(E) Draft Drugs (Amendment) Rules, 2022 (QR Codes)**

The Indian healthcare ecosystem believes in ensuring highest quality of care at affordable prices. Globally and in India, the industry has enjoyed a long-held reputation as a credible producer of quality pharmaceuticals, generic drugs including APIs. Barcoding/ or usage of QR codes will significantly ease out to identify genuine medicines and further streamline the pharma value chain. A clarification from CDSCO if there would be any additional compliances implemented in near future for Schedule H2 drugs, would be valuable. Information on the understanding of the role of the private sector, and would the said infrastructure be available as open APIs to industry players to develop innovative solutions for their users to access this vital service thus enhancing the reach of this initiative? Also, clarity on how MRP revisions would be adjusted. Would the backend information change as the MRP changes? These were submitted to Drugs Controller General of India (DCGI), Central Drugs Standard Control Organization, Government of India.

For detailed representation, please write to  
*Ms Leena Jaisani at leena.jaisani@fikki.com*

### **FICCI Representation on Order S.O. 1509(E) dated March 30, 2022, for Removal of Stock Limit on Edible Oils Under the Essential Commodities Act, 1955**

The removal of these limits is particularly necessary in view of the festival season that has started with Navratras to be followed by Diwali which generally witness high demand from consumers. Due to the stock limit, several of our members have been suffering losses as they are unable to service latent demand with legally permissible stockholding of edible oils. Additionally, manufacturers, marketers and packers are also facing significant challenges as they are not able to service the demand. For large retailers especially whose daily sales of edible oils are generally over one tonne, the stock holding limits are a major impediment. Considering the existing holding limit of three tonnes, this only permits a few days of inventory. As supply chain and logistics issues prevail, it is very difficult to ensure that stock is available at stores with such a short lead time. In view of the above, FICCI intervention to either remove the current stock-holding limits or enhance this limit for large stores that typically see a higher off-take of edible oil. These were submitted to Hon'ble Union Minister, Ministry of Consumer Affairs, Food & Public Distribution, Government of India.

For detailed representation, please write to  
*Ms Leena Jaisani at leena.jaisani@fikki.com*

### **Feedback from FICCI National Committee on Banking on RBI Discussion Paper on Climate Risk and Sustainable Finance**

FICCI submitted detailed feedback on the RBI Discussion paper on climate risk and Sustainable Finance. Some of the immediate priorities that FICCI identified included Raising awareness on Climate risks and their implications in India Inc., across different levels, including leadership and Board, Creating common disclosure norms for India Inc., especially corporates (both listed and unlisted). The common

disclosure standard should be agreed to by all regulators; Supervisory oversight by respective regulators including MCA, RBI, SEBI, IRDA etc. over India Inc. This supervisory oversight may be routed via a common platform that is suggested to be set up among the regulators, so there is a seamless direction given to the regulated entities; Cascading carbon reduction targets which are derived from India's NDC's to India Inc. – this would be a long-term initiative on which work may start now, but which will take longer to implement; VGF or blended finance support to cover initial offtake and technology risk. This was submitted to Executive Director, Reserve Bank of India.

For detailed recommendation, please write to  
*Mr Anshuman Khanna at anshuman.khanna@fikki.com*

### **FICCI White paper: - Case for Inclusion of EPFO Passbook, ePAN and Form 26AS in DigiLocker**

FICCI submitted a white paper on the inclusion of EPFO Passbook, ePAN and Form 26AS in DigiLocker. Given the proven success and popularity of DigiLocker among Indian citizens, the inclusion of additional documents frequently required by banks and other financial institutions on the platform would further increase user convenience and help in the quick, secure, and transparent digital issuance of credit. The move would benefit banks, finance providers and fintech companies as well as customers applying for credit. This was submitted to the Secretary, Department of Economic Affairs, Ministry of Finance; Secretary, Department of Financial Services, Ministry of Finance and Secretary, Ministry of Electronics and Information Technology.

For detailed recommendation, please write to  
*Mr Anshuman Khanna at anshuman.khanna@fikki.com*

### **Call for Action: Making quality cancer care more accessible and affordable in India**

Given the backdrop of a growing burden of cancer across India, the Report by FICCI Task Force on Cancer Care Infrastructure, in collaboration with EY, on 'Call for Action: Making quality cancer care more accessible and affordable in India' is a timely initiative to highlight the need for more effective policy measures aimed at proactive cancer prevention and treatments. This knowledge paper will serve as a beacon of light to strengthen India's strategy for cancer care and help it serve as a model for other non-communicable diseases. The detailed epidemiology of various types of cancer in every state of India and global comparisons described in this report highlight the substantial variations between the states for different types of cancer and serve as a useful reference for more targeted planning of cancer control, commensurate with the trends of different cancers in each state of India.

This was submitted to Member, NITI Aayog, Hon'ble Vice President of India and Ministry of Health & Family Welfare, Government of India.

For detailed recommendation, please write to  
*Mr Praveen K Mittal at Praveen.mittal@fikki.com*

### **Strengthening Healthcare workforce in India: the 2047 Agenda**

As a focus area for 2022, FICCI formed a task force on 'Healthcare Workforce Strengthening' to provide inputs on the present and

futuristic requirements for addressing the demand-supply challenges, increasing DNB seats in private sector for enhancing the number of specialist doctors and developing a strategy for enhancing the numbers of nurses and paramedics in the country. The Task Force, in collaboration with KPMG, has developed this publication on 'Strengthening Healthcare workforce in India: the 2047 Agenda', highlighting the recent reforms in governance structure and regulations in medical, nursing and allied healthcare workforce. Further, an in-depth assessment was conducted to understand the journey and transformation of healthcare education in the country and the looming healthcare workforce gaps in various states. This report provides recommendations on how the workforce can be strengthened by bringing in technological innovations to build concrete solutions in order to address the shortage and vacancies in current positions at various delivery levels.

This was submitted to Member, NITI Aayog, Hon'ble Vice President of India and Ministry of Health & Family Welfare, Government of India.

For detailed recommendation, please write to  
*Mr Praveen K Mittal at praveen.mittal@ficci.com*

### **Inputs/comments requested on representation on NLEM**

Recently, National List of Essential Medicines (NLEM) has been released to give a boost to cost-effective, quality medicines and to contribute towards reduction in Out-of-Pocket Expenditure on healthcare for the citizens. In the NLEM 2022, 384 drugs have been included in this list with addition of 34 drugs, while 26 from the previous list have been dropped. The medicines have been categorized into 27 therapeutic categories.

However, introducing new drugs to the National List of Essential Medicine (NLEM) will ensure that drugs are made more affordable and available to the public, there are few observations that are raised by the industry that requires further clarification to avoid ambiguity.

The Key recommendations included- 1. To provide a 45-day period to manufacturers to 'carry into effect' the price fixed or revised by the Government; 2. The review of applications undertaken by the Department of Pharmaceuticals (DoP) to pass an order to have a fixed timeline, i.e. 30 days; 3. The power to review should not be restricted to Para 4, 5, & 6 of DPCO 2013, DoP should have the powers to review petition pertaining to all the provisions of DPCO.; 4. Implementation of Wholesale Price Index (WPI) in April every year. These were submitted to National Pharmaceutical Pricing Authority.

For detailed representation, please write to  
*Mr Praveen K Mittal at praveen.mittal@ficci.com*

### **FICCI Pharma/October22/02- Input Request for verification on data on IPDMS 2.0**

NPPA has recently launched Integrated Pharmaceutical Database Management System 2.0 (IPDMS 2.0) to better optimize synergies in operations to promote Government's thrust on 'Ease of Doing Business'. It would provide a single window for submissions of various forms as mandated under Drug Price Control Order (DPCO),2013. In lieu of this it has been brought to our notice by our member companies

that there are certain operational challenges being faced by them while using the IPDMS 2.0, including Accessibility to IPDMS 2.0, Adherence to pricing compliances & verification of data by the company, Production capacity is asked at product level, Improving Operational Efficiencies, Old IPDMS portal.

Further we have requested the NPPA chairman to review the key issues listed in the detailed recommendations. Also, to activate old IPDMS parallel for minimum 3 months to facilitate filling of compliance forms till the current issues in new portal is resolved and to revised Instruction/ User manual for IPDMS 2.0'. These were submitted to National Pharmaceutical Pricing Authority.

For detailed recommendation, please write to  
*Mr Praveen K Mittal at praveen.mittal@ficci.com*

### **FICCI's extension requests for the implementation of Indian Pharmacopoeia (IP) 2022**

On 1st of July 2022, the Hon'ble Union Minister of Health & Family Welfare, and Chemical & Fertilizer, Mr Mansukh Mandaviya released Indian Pharmacopoeia (IP) 2022 to revise IP and to update them as per current global requirements and to harmonize with other pharmacopoeias, is noteworthy and a commendable step.

We had requested that an extension should be granted for the implementation timelines to provide an adequate buffer to the companies to undertake the revision activity for all the products. Considering this we requested to extend the implementation date by at least 12months and/or up to 1.5 year to ensure there is no disruption in supplies of essential medicines to patients while ensuring business continuity for the industry. This was submitted to Drugs Controller General of India, Central Drugs Standard Control Organization with a copy to the Secretary-cum-Scientific Director, Indian Pharmacopoeia Commission, Ministry of Health & Family Welfare, Government of India.

For detailed recommendation, please write to  
*Mr Praveen K Mittal at praveen.mittal@ficci.com*

### **Request for correction in CDSCO process of Publishing Drug Alert list on NSQ Products**

The current process adopted for publishing the list of Not of Standard Quality (NSQ) products on CDSCO website is neither preceded by any detailed verification and or investigation by the regulatory agency neither does the company get any prior opportunity to establish or present the actual facts and for some inexplicable reason, the list suddenly gets published on a website that's publicly accessible.

The list needs to clearly distinguish between an NSQ and a Spurious drug. Currently, a spurious drug is listed as an NSQ of a genuine manufacturer giving a false impression to the doctors, public and importers that the manufacture's drug has quality issues and causes irreparable damage to the reputation of the Indian Pharma industry. This was submitted to the Joint Secretary, Department of Health and Family Welfare.

For detailed recommendation, please write to  
*Mr Praveen K Mittal at praveen.mittal@ficci.com*

### **Request for extension of GSR 20(E) dated 18th January 2022, Mandating QR code for every Active Pharmaceuticals Ingredient (API) manufactured or imported in India**

FICCI has submitted a representation earlier on 4th April 2022 regarding 'Mandating QR code for every Active Pharmaceuticals Ingredient (API) manufactured or imported in India' for the final notification of Drugs & Cosmetics (Amendment) Rules, 2022 vide GSR 20(E) k 18th January 2022.

However, in the absence of clear technical guidelines in line with global standards for the implementation of QR codes on the API packaging, the industry is facing several challenges in the implementation of QR codes to ease the process and match international standards. In the previous representation, the Pharma industry also requested the Union Health Ministry to revoke the amendment and provide an extension of 12 months. As, in the absence of the implementation guidelines, overseas API manufacturers/suppliers are also finding it difficult to meet the QR code requirement timeline of 1st January 2023.

In furtherance to this, the representation was submitted again to the Joint Secretary, Department of Health and Family Welfare, mentioning the challenges faced by industry so far and key recommendations to get better clarity and extension by 12 months.

For detailed representation, please write to

*Mr Praveen K Mittal at [praveen.mittal@ficci.com](mailto:praveen.mittal@ficci.com)*

### **FICCI's request to withdraw the notices issued by NPPA regarding the Intra Brand Maximum Retail Price (MRP) comparison of a Non-Scheduled Formulations**

Few of our members have received notices from NPPA regarding overcharging with an intend to control the intra-brand price differences of drugs under Para 20 of the DPCO 2013, though, however its greatly impede the true intent of creating a vibrant, competitive, and innovative drug industry. However, the notices being sent are reportedly based on an erroneous interpretation of DPCO 2013 – (As it has been observed if a company has a multiple brands of a non-schedule formulation (same strength & dosage), NPPA will consider the MRP of the lowest brand and all other brands which exceeds 10% within 12 months will be considered a case of Over-charging). This is apparently also not aligned with DPCO 2013 as well as NPPA's own interpretation and practice till now.

We requested them to consider the withdrawal of all proceedings initiated towards controlling Intra-brand price differences of non-scheduled formulations as India is predominantly a branded generic market with the same company marketing more than one brand of the same formulation at very different price points, to cater specific market demands based on location and prescription behaviour. Intra-brand price differential ensures that a drug is available to a much wider range of patients than would not have been the case, if only a single price point were to be used in all markets across the country.

For detailed recommendation, please write to

*Mr Praveen K Mittal at [praveen.mittal@ficci.com](mailto:praveen.mittal@ficci.com)*

### **FICCI'S Pharma and Medical Devices recommendations on Basic Customs Duty proposals & Income Tax proposals for Drugs/ Medical devices sector**

Department of Pharmaceuticals requested to submit tax proposals for inclusion in Budget 2023-24 from Pharmaceutical and Medical Devices industry. The Budget proposals are said to be submitted to the Department of Revenue and then to the Department of Economic Affairs for final consideration into the Budget announcements. The following tax proposals were submitted to the Under Secretary (Policy & FDI), Department of Pharmaceuticals, Ministry of Chemicals and Fertilizers, Government of India:

- a. Basic Customs Duty proposals and Income Tax proposals for drugs
- b. Basic Customs Duty proposals and Income Tax proposals for medical devices

For detailed recommendation, please write to

*Mr Praveen K Mittal at [praveen.mittal@ficci.com](mailto:praveen.mittal@ficci.com)*

### **CIFTI – FICCI representation on health certificate requirement accompanied with the import of food consignments**

FICCI has requested FSSAI to align internally at government level with Ministry of Animal Husbandry & Dairying, GoI for releasing an integrating/single health certificate format acceptable by both authorities i.e., FSSAI and DAHD.

For detailed representation, please write to

*Mr Abhinav Singh at [abhinav.singh@ficci.com](mailto:abhinav.singh@ficci.com)*

### **FICCI CODEX Cell comments on Second Circular of the eWG on the GSFA to the 53rd CCFA**

FICCI submitted to NCCP & FSSAI, the comments on various appendix of the GSFA second circular letters.

For detailed representation, please write to

*Mr Abhinav Singh at [abhinav.singh@ficci.com](mailto:abhinav.singh@ficci.com)*

### **CIFTI-FICCI Representation on the latest direction dated 2/8/22 on the declaration of net quantity on edible oil etc. in volume with temperature violation thereof released by MoCA, GoI**

FICCI has requested MoCA to provide the update on FICCI representation on the latest direction dated 2/8/22 on the declaration of net quantity on edible oil etc. in volume with temperature violation thereof released by MoCA, GoI which was submitted on 22nd August 2022.

For detailed representation, please write to

*Mr Abhinav Singh at [abhinav.singh@ficci.com](mailto:abhinav.singh@ficci.com)*

### **Seeking extension for the implementation of health certificate requirement accompanied with the import of food consignments**

FICCI requested FSSAI to provide an extension on the implementation of health certificate requirement accompanied with the import of food consignments for least 6 months or up to 1st May 2023.

For detailed representation, please write to

*Mr Abhinav Singh at [abhinav.singh@ficci.com](mailto:abhinav.singh@ficci.com)*

## CIFTI-FICCI seeking FSSAI support for exemption of food products from the declaration of unique selling point (USP) on FOP: Legal Metrology notification dated 16th August 2022

In the submitted representation, FICCI first thanked FSSAI for giving us the opportunity to discuss the Legal Metrology Division notification dated 16th August 2022 on the subject entitled, 'Inviting Public Consultation for declaring two or more prime constituents of the commodity on front side of the package with the Brand Name/ Logo'.

FICCI states that the draft proposal will pose huge challenge and unnecessary duplication of the information, as the industry is already following the Food Safety and Standards Regulations.

The Food Safety and Standards (Labelling and Display) Regulations, 2020, extensively covers this requirement with clear indications of the various options and relevant declarations as also the manner of printing on label.

The Food Safety and Standards (Advertising and Claims) Regulations, 2018 mandates the relevant information to be declared on Front of Pack.

We further reiterated that both the FSSAI and Legal Metrology enforces the rules under the same head hence we requested for the harmonization of the regulation among competent authorities with the concerned stakeholder's consultation.

In this regard, we humbly requested to take up the matter with legal Metrology Department to ensure exemption of the Food products from the above stated provision.

For detailed representation, please write to  
*Mr Abhinav Singh at abhinav.singh@ficci.com*

## CIFTI – FICCI representation pursuant to the meeting conducted by the Legal Metrology Division dated 4th October 2022

The submitted representation to Ministry of Consumer affairs, was in reference to the meeting conducted by the Legal Metrology Division on the proposal of declaration of two or more prime constituents containing the percentage/ quantity of unique selling point / unique selling proposition (USP) of the product in the same font size in which the declaration of (USP) dated 04th October 2022.

FICCI thanked the ministry for providing us with an opportunity to discuss the concerns related to the declaration of two or more prime constituents containing the percentage/ quantity of unique selling point / unique selling proposition (USP) of the product in the same font size in which the declaration of (USP). We greatly appreciated the enormous interest and support extended by the Ministry of Consumer Affairs to understand the key areas of concern and in providing clarity on many of them.

FICCI reiterated the position that there is an existing law and regulation for food which ensures consumer protection, safety and the right to Information in much detail. As the food industry is already following the

Food Safety and Standards Regulation, mentioning USP on the front of the pack will be the duplication of the information.

FICCI also submitted the response to some of the concerns raised during the meeting. FICCI stated that given that with so many mandatory regulatory requirements (which industry is already complying with) there is already space constraints on labels. It would be difficult and redundant to repeat same information, which is already declared on labels in different manner (as per FSSAI requirements).

As current food labels are already providing this necessary information to provide informed choices to consumers, we reiterated the submission to provide an exemption to food products covered under FSSAI regulations.

For detailed representation, please write to  
*Mr Abhinav Singh at abhinav.singh@ficci.com*

## Recommendations on Press Note 3 and FDI

Based on discussions at the closed-door interaction with Ms Manmeet Nanda, Joint Secretary, Department for Promotion of Industry and Internal Trade (DPIIT), FICCI submitted a detailed representation highlighting challenges with PN3 and other issues impacting FDI in India.

For detailed recommendation, please write to  
*Ms Abha Seth at abha.seth@ficci.com*

## Joint Audit and Non audit services

Based on feedback received from members, FICCI has reiterated industry concerns on proposals pertaining to Non-Audit Services and Mandatory Joint Audits. These have been submitted earlier too as part of FICCI recommendations on the Report of MCA Company Law Committee dated March 2022.

For detailed recommendation, please write to  
*Ms Abha Seth at abha.seth@ficci.com*

## Submission on Corporate Finance related issues

Based on discussions at the closed-door interaction with Mr Jeevan Sonparote, CGM, SEBI, FICCI has submitted a detailed representation on issues pertaining to delisting and reverse book building process, MPS norms, applicability of LODR Regulations to high value debt listed entities, need for continuation of exemptions granted during pandemic.

For detailed recommendation, please write to  
*Ms Abha Seth at abha.seth@ficci.com*

## Overseas investment rules and regulations

Based on discussions held at the previous meeting of FICCI Corporate Laws Committee, a detailed submission has been made to RBI highlighting practical challenges being faced by industry on Overseas Investment Rules and Regulations, 2022 recently notified by the Ministry of Finance.

For detailed recommendation, please write to  
*Ms Abha Seth at abha.seth@ficci.com*



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