VOICE OF FICCI

SHAPING THE AGENDA

October 2021

From the Director General

FICCI jointly organised the Global Business Leaders and Investors Roundtable along with US India Strategic Partnership Forum on 16 October 2021. Ms. Nirmala Sitharaman, Finance Minister spoke at length on the reforms undertaken by the government to ease foreign investment in infrastructure. She assured investors and other shareholders in the industry that with the current reset in the global supply chain, growth and varied opportunities are bound to present themselves.

On the recent monetary policy announcement made by the RBI on 08 October, FICCI is encouraged to note the balanced approach of the Reserve Bank with growth continuing to be given due consideration. The RBI has continued to maintain adequate liquidity as we see some moves towards normalization.

While the recent spurt in energy prices and prices of industrial inputs remain a concern, India Inc agrees with RBI's observation that efforts to contain cost, push pressures through a calibrated reversal of the indirect taxes on fuel could contribute to a more sustained lowering of inflation.

Additionally, as continued support for the MSME sector remains important, the Federation is pleased to note the extension of on tap Special Long Term Repo Operations (SLTRO) for Small Finance Banks (SFBs) and on lending facilities through NBFCs. We hope that RBI will also look at other important measures such as change in classification norms of MSMEs for NPAs and reduction in cash margins as these will go a long way in alleviating the challenges being faced by these enterprises.

FICCI, in this past month, submitted its recommendations to the RBI on Current Account regulations to relax account opening norms for small customers with exposures of less than INR 5 crore.

As we begin the countdown to the Union Budget 2022-23, formulation of proposals is currently being undertaken for various sectors. Suggestions for Budget proposals from the industry have been requested. FICCI, on its part, has been collating and sending these suggestions to the Department of Revenue, Ministry of Finance, for their consideration.

Arun Chawla

FICCI submits suggestions on Current Account regulations to relax account opening norms for small customers with exposures of less than INR 5 crore

Currently, as per RBI circular dated 06 August 2020, customers having non-CC/OD exposure of less than INR 5 crore are freely permitted to open current accounts with any bank without any restriction. FICCI suggested to extend this provision to CC/OD customers as well who have an exposure of less than INR 5 crore from the banking system. Thus, all customers with less than INR 5 crore exposure in banking system will be treated at par. The rationale for suggestion is as follows.

- Most of these small borrowers with exposure of less than INR 5 crore are sole banking customers/ sole banking MSMEs and thus, diversion of funds will not be an issue as funds flows are actively tracked and taken care of by individual banks. Having a current account with a sole bank in addition to CC/OD will not result is diversion as both accounts would be with the same bank.

- Proprietors of some of the concerns avail personal ODs like OD against fixed Deposits / OD against housing property (LAP) / OD against securities (LAS which is restricted to INR 20 lakh against equity shares)/ unsecured OD and use them towards personal consumption or at times deploy borrowed funds for business purpose. Availing such facility in the form of Overdraft will help such customers to save interest costs if they have some surplus funds for temporary period and manage their liquidity. Such sole proprietors will also have business concern or may like start a new business concern but are denied of new current account for simple reason that proprietor is having a personal OD (FAQ 6 of RBI clarification dated 14 December 2020). This will cause unnecessary hardship to small borrowers running business enterprises though sole proprietorship model.

- Also, if such sole proprietor wants to start a new sole proprietorship concern for different activity, he would not be able to open current account for new entity as existing concern may be enjoying CC/OD facility and both entities carry same PAN as proprietor is common. This creates hassles to small businesses.

The proposal to seek exemption of all borrowers with less than INR 5 crore exposures from the circular provisions would help MSMEs and

'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.

other small businesses and avoid unnecessary hardship, was submitted to, Secretary, Department of Financial Services, Ministry of Finance.

For detailed representation, please write to
Mr Anshuman Khanna at anshuman.khanna@ficci.com

Budget proposals for Chemicals sector, year 2022-23, submitted

An exercise for formulation of proposals for the Union Budget 2022-23 is being undertaken, which involves the review of the Central Customs, Excise and Goods & Service Tax (GST) in respect of Chemical Sector. For this purpose, suggestions from the industry were requested. Based on received suggestions, the Department of Chemicals & Petrochemicals would firm up the Budget proposals for sending to Department of Revenue, Ministry of Finance, for their consideration. These were submitted to Director, Department of Chemicals and Petrochemicals, Ministry of Chemicals and Fertilizers, Government of India.

For detailed representation, please write to
Mr Manoj Mehta at manoj.mehta@ficci.com

FICCI requests for support on issues faced by the Renewable Energy Industry

- Increase extension in SCOD from the current 2.5 months to 6 months for under construction projects and allow Change-in-Law during this extension period
- Allow Change-in-Law for GST/SGD for modules installed post commissioning of projects – this will help IPPs declare COD as soon as AC capacity is installed which will help the government in achieving the renewable energy capacity addition targets
- Extend BCD for Cells by 12 months (April 2023) and Modules by 6 months (October 2022) for SCOD extension to be mirrored in BCD application and BCD not applying to projects already bid out by March 2021. Postponement of BCD will help in accounting for the delay in procurement due to second covid wave and China Force Majeure event. This will further allow developers to procure from China with no loss to Indian manufacturers as these modules were never envisaged to be procured from India.

This was submitted to Minister for Power and New and Renewable Energy.

For detailed representation, please write to
Ms Rita Roy Choudhury at rita.roychoudhury@ficci.com

FICCI requests reconsidering rate for Mustard Oil Cake under RoDTEP Scheme

As per the notification on 17 August 2021 on RoDTEP, the rate for Mustard Oil Cakes (HS Code: 23069012) has been reduced to 0.5% on FOB, which is very less compared to the previous rate of 5% on FOB under MEIS Scheme. FICCI has, therefore, suggested to reconsider the benefit rate for Mustard Oil cake under RoDTEP scheme from present percentage of 0.5% to boost trade of mustard oil cakes from India. This was submitted to Additional DGFT, Directorate General of Foreign Trade, Ministry of Commerce & Industry, Government of India.

For detailed representation, please write to
Ms Ruchira Saini at ruchira.saini@ficci.com

Committee for fast tracking of new molecules and formulations constituted

A committee was formed under Dr Anupama Singh, Principal Scientist & Head, Department of Agro-Chemicals regarding fast tracking of the new molecules and formulations. Several companies have shared a list of products to the committee in this context. FICCI has requested for efficient and time bound system for taking decisions on the submitted existing portfolios in agrochemicals. This will create an enabling environment and will be a great encouragement for the industry. This was submitted to Agriculture Commissioner, Ministry of Agriculture & Farmers Welfare, Government of India.

For detailed representation, please write to
Ms Ruchira Saini at ruchira.saini@ficci.com

Recommendations regarding farm mechanisation submitted

The demand for agricultural equipment with modern technology is expected to rise, as machinery with better technology will act as a catalyst for optimal utilisation of Agri-Inputs and protect soil degradation there by increasing the agricultural yield. Adoption of appropriate Precision and AI in mechanisation of farm operations and Farm to Fork can reduce food wastage there by effective farm productivity and improve utilisation of farmers funds and increasing their realisation. Studies reveal that adoption of appropriate mechanisation of farm operations can increase food production and farm productivity by 10–15% and cropping intensity by 5%–20%. Few suggestions are made to strengthen farm machinery sector. This was submitted to Joint Secretary (M&T), Ministry of Agriculture & Farmers Welfare, Government of India.

For detailed recommendation, please write to
Ms Ruchira Saini at ruchira.saini@ficci.com

Support from MoHFW & CDSCO sought on MDR 2017

Support from MoHFW and CDSCO was sought on issues pertaining to

- Guidelines for import of medical devices.
- Exemption from separate registration of Medical Devices Accessories and components.
- Exemption from wholesale license requirement for suppliers and distributors.
- Provision for direct import of MDs on recommendation of Health

Care institutes like AIIMS, HLL, DGFAMS, PGIMER, etc. through Original Equipment Manufacturer by considering valid import license for clearance at Customs.

- Exemption/ Extension of six months from Slickening of Non-Notified Medical Devices for stocks that are already imported/ ready for use of patient.

This was submitted to Secretary, Health.

For detailed representation, please write to
Mr Mehul Tyagi at mehul.tyagi@ficci.com

FICCI recommendation on Excluding Non-Auctioned Mines from Charges under Schedule V & VI of MMDR Amendment Act 2021

Via the representation, FICCI had recommended from excluding the non-auctioned mines from levy of additional charges under Schedule V & VI of MMDR Amendment Act 2021, which is increasing the overall taxation burden for the industry and in some cases is even making mineral product priced higher than the prevailing market prices. This was submitted to Secretary, Ministry of Mines.

For detailed representation, please write to
Mr Arpan Gupta at Arpan.gupta@ficci.com

Support from the CDSCO sought for business continuity on import of pre-owned refurbished medical devices

Several suppliers and refurbishers have applied for import and refurbishment license with CDSCO in line with MDR 2017 application requirements and awaiting license from CDSCO. Keeping the 15 October deadline in view, FICCI Medical Device Committee members requested CDSCO to permit business continuity for import of pre-owned medical devices either in refurbished form or imported for refurbishment in India and various refurbishment activities carried out in India until appropriate licensing guidelines are in place. This was submitted to DCGI.

For detailed representation, please write to
Mr Mehul Tyagi at mehul.tyagi@ficci.com

Clarification regarding gazette notifications and trade notice on amendment policy of syringes and incorporation of policy condition sought

Request was made to Director General, DGFT to reconsider Notification No. 34/2015-2020 S.O 4066 (E) dated 04 October 2021 regarding amendment in export policy of syringes and incorporation of policy condition. Suggestions were made to DGFT to exempt Syringes that are not used in Vaccination from this Notification and allow Industry to process the Export commitments made to other Countries that are dependent on Indian Companies for their Vaccination Program.

For detailed representation, please write to
Mr Mehul Tyagi at mehul.tyagi@ficci.com

FICCI representation on export logistics submitted

FICCI has submitted a brief representation on export logistics issues and their resolutions to Commerce Secretary, Ministry of Commerce & Industry.

For detailed representation, please write to
Mr Manab Majumdar at manab.majumdar@ficci.com

FICCI submission for imposition of anti-dumping duty on import of decor paper from China PR

FICCI has made submission to Revenue Secretary, Ministry of Finance, regarding the case of imposition of anti-dumping duty on imports of Decor Paper from China PR.

Décor Papers demand in India is at ~64000 MT/annum valued at ~Rs 700 crore (in FY 2019-20). The industry has been growing at a CAGR of 31% over last 3 years. Indian Industry meets 37% of the total demand while remaining (63%) is met through imports, of which substantial quantity is imported from China.

Decor paper is an uncoated paper, used as a base paper for high-pressure and low-pressure laminates. It is used to provide quality finish on wooden backing materials and gives a visual appearance of the laminate. The single-colour paper may be used as it is or printed with range of design and can be found on furniture surface, flooring, and panelling. Decor paper may either be used as such or may require further printing.

Aggrieved by the influx of cheap dumped imports into the country from China PR, the domestic industry has filed an application requesting initiation of anti-dumping investigation concerning imports of Decor Paper. After elaborate investigation, the DGTR vide final finding No. 6/38/2020-DGTR dated 28 September has concluded as under.

- Decor paper is being dumped into India from China PR.
- The domestic industry has suffered injury because of such dumping.
- The imposition of anti-dumping would not be against public interest.

Accordingly, the DGTR has recommended imposition of anti-dumping duty on imports of subject goods from China PR.

While the findings of the DGTR demonstrate the need for imposition of duty, domestic industry submits the following additional points in this regard.

- Unfair pricing by Chinese producers – The producers in China PR are engaging in unfair trade practices. This is evident from the fact that the DGTR has found all cooperative producers to be dumping. Such dumped imports have impaired the ability of the domestic producers to compete in the market, as the imports have entered the market at injurious prices. It is submitted that while fair competition must be encouraged, it is imperative that unfair competition be curbed. Therefore, imposition of duty is necessary to restore fair competition in the market.

- Capacity expansion undertaken – Industry has expanded capacity, investing ~Rs 200 crore, to reduce reliance of India on imports of the product. However, have suffered significantly due to the influx of cheap imports into the Indian market. If duties are not imposed, in the long run, domestic industry players would be forced to either shut down operations with respect to decor paper or would have to look for alternative markets. In such a situation, the consumers would become substantially dependent upon imports.

  Further, in the absence of duty, future investment in the product would be discouraged. The product will attract investment only if fair competition prevails in the market. However, at present, the imports have destroyed the conditions of market competition, which has impaired the investment potential of the product.

- Injury to Domestic Industry – The findings of the DGTR reveal that the volume and market share of subject imports increased significantly. Thus, the domestic producers lost market to the imports. Further, the imports created a strain on the prices of the industry, which resulted in a decline in its profitability. Therefore, the dumped imports have adversely impacted the performance of the domestic producers. The Injury margin ranges from 10%-40%.

- Role of domestic producers in supplying the product – Industry has not only shown long-term commitment to the Indian market but are also invested in development of the market. On the other hand, the exporters merely aim at maximising their profits and will not hesitate to exit this market in case of better price availability elsewhere. Therefore, the domestic producers play a crucial role in the Indian market, and their viability must be protected.

  Decor paper produced and supplied is of good quality. This has been demonstrated in tests conducted by the CPPRI (Central Pulp & Paper Research Institute).

- No adverse impact on users – During the investigation before DGTR, several users participated and made submissions with regard to the potential impact of the duty on their operations. The users conceded that decor paper forms only 6% of their cost of production. The DGTR determined a dumping margin of 0-10%, implying that the duty is a maximum of 10%. Even considering the maximum duty of 10%, it implies that the imposition of duty would increase the cost of the users by 0.6% at best. Therefore, it is evident that the operations of the users would not be adversely impacted by the imposition of duties.

  DGTR also analysed the performance of the users over the period, and it was noted that the profitability of the users was the highest in 2016-17, when there was no dumping, and the domestic producers were not suffering. However, during 2019-20, when the imports increased and created a price strain on the prices of the domestic producers, the profitability of the users also underwent a decline.

- Availability of alternative sources – There is significant production of Décor paper in Italy, Japan, Poland, and Germany. Therefore, in addition to sourcing their requirements from the domestic producers, the users can also source the product from these countries. Accordingly, the users would be able to maintain multiple sources of supply.

- Concessional duty enjoyed by the users – The users are already enjoying benefit of concessional duty, and therefore, the imposition of anti-dumping duty would not create a significant burden. While the bound tariff rate for the product is 40%, scheduled rate is only 10%. Further, there is a concession of 29% for imports under HS Code 4802 2090 and 30% for imports under HS Code 4805 9100. Thus, the users enjoy an effective duty of approximately 7%.

  In view of the foregoing, industry submits that while domestic producers are in dire need of anti-dumping duty, the imposition of duty would not adversely impact the interests of users or other parties. It was, therefore, requested to the Government to kindly give effect to the recommendations of DGTR and impose anti-dumping duty on imports decor paper from China.

For detailed representation, please write to
Mr Manab Majumdar at manab.majumdar@ficci.com

FICCI submission on Draft Overseas Investment Rules & Regulations

Based on feedback received from members, FICCI has submitted comments to CGM, RBI on RBI's draft rules for rationalization of overseas investment regulations under FEMA, 1999.

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

Request for exempting foreign companies from Section 135(6) of the Cos Act submitted

As per section 135(6) of the Companies Act, any unspent CSR amount pursuant to an 'ongoing CSR project' should be transferred to the 'Unspent CSR Account'. In many situations, while a company has disbursed the full CSR amount from its end, the amount could not be fully utilised by the NGO implementation partners on or before 31 March 2021. While a foreign company may request its NGO implementation partner(s) to refund the unutilised CSR amounts, such a refund of the foreign contribution may not be permitted under the FCRA legal framework. Hence, a foreign company may not be able to obtain a refund of the unutilised CSR amounts from the NGO implementation partners and may accordingly be unable to transfer the unspent CSR amounts to the Unspent CSR Account, within 30 days from the last date of the financial year. It has been submitted that all foreign companies (which are required to comply with the FCRA while disbursing their CSR grants to FCRA-registered NGOs) may be exempted from complying with the provisions of Section 135(6) of the Act. This was submitted to Joint Secretary,MCA.

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

FICCI recommendations on SEBI (Settlement Proceedings) Regulations, 2018 submitted

Based on feedback received from members, FICCI has submitted comments on SEBI Discussion Paper on Review of the SEBI (Settlement Proceedings) Regulations, 2018.

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

FICCI highlights issues faced by industry and foreign investors on Press Note 3

FICCI has once again highlighted the issues being faced by industry as well as foreign investors due to ambiguity in the definition of 'beneficial owner' in reference to Press Note 3. It has been requested to clarify that if a foreign investor is a fund/ pooled investment vehicle, prior government approval for foreign direct investment will not be required under Press Note 3, so long as the investment manager of such fund/ pooled investment vehicle is not incorporated in or a resident of one of India's neighbouring countries. Alternatively, if an underlying ownership test must be applied, then it should be clarified that if a foreign investor is a fund/ pooled investment vehicle prior government approval for foreign direct investment will not be required under Press Note 3, so long as the investment in that fund/ pooled investment vehicle by entities incorporated/ persons resident in India's neighbouring countries is below the threshold of 25% of the total capital of such foreign investor. These were submitted to Secretary, DPIIT.

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

FICCI requests for extension of relaxation granted to companies for holding AGM through VC/ OAVM

FICCI has submitted to JS, MCA, that relaxations granted to companies with respect to holding AGMs and printing and dispatch of Annual Reports should be extended till 31 December 2022 for the benefit of companies whose financial years are ending on 30 September, 31 December, or any other date.

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

FICCI representation on Liberalised Remittance Scheme and Depository Receipts

It has been submitted to Finance Minister, that resident Indians are currently excluded from investing, even from their money sent under RBI's Liberalised Remittance Scheme (LRS), in DRs of Indian companies even though rest of the world can partake in the value creation by Indian companies. While it is understood that Indian residents can invest in some of these domestic companies in local currency, investment in DRs gives them the ability to diversify their investments. As the investment in DRs would be made from the money sent under LRS, there is no risk of flouting any foreign exchange norms while making the investment in DRs. FICCI has therefore requested for a review of this provision. The Liberalised Remittance Scheme 2013 applies the rules meant for companies to individuals as well vis-à-vis foreign investment. As a result, individuals can only invest in operating companies and not in passive companies like investment companies. Accordingly, members of a family cannot co-invest in a house or a flat abroad, even though there are no such restrictions within the country. We would be grateful if this restriction can be reviewed so that an individual is allowed to take decision on how/where he wants to invest his tax-paid money, in India or abroad, subject to overall restrictions on remittance abroad per RBI Regulations.

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

Inputs for 5th Joint Sub-Commission on Trade with Vietnam submitted

Indian Industry had shared their inputs for 5th Joint Sub-Commission on Trade (JSCT) with Vietnam for the G2G discussions, which were submitted to Under Secretary, Ministry of Commerce.

For detailed representation, please write to
Mr Abha Seth at abha.seth@ficci.com

FICCI report on survey regarding supply chain disruptions faced by industry during the pandemic

Further to the Supply Chain Resilience Initiative (SCRI) launched in 2020 by Trade Ministers of India, Japan and Australia which aims to create a virtuous cycle of enhancing supply chain resilience with a view to eventually attaining strong, sustainable, balanced, and inclusive growth in the Indo-pacific region. Based on the high-level consultations among the Governments of Australia, India and Japan, the ministers noted the importance of risk management and continuity plans to avoid supply chain disruptions and affirmed their commitment to strengthen resilient supply chains. In view of the significance of the same, FICCI with the support of Department for Promotion of Industry and Internal Trade (DPIIT) had conducted a survey regarding the supply chain disruptions faced by Indian industry during the pandemic times. This was submitted to Director, Department for Promotion & Industry Trade.

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

CIFTI representation on method for determination of Niacin in food

In the representation, FICCI has shared inputs to FSSAI on the method for the determination of Niacin in foodstuffs. The relevant section under which the comments were submitted is Scope, where it has been suggested to opt for one method for Niacin determination. The two methods described in the manual are Option A, Acid hydrolysis (bio accessible/bioavailable) and Option B, acid/alkaline hydrolysis. FICCI supported Option A over Option B because:

- Fewer chemicals are used in Option A.
- Fewer steps are used in Option A; therefore, it is faster and cheaper.
- Option B liberates more Niacin; therefore, it is not advantageous if Niacin is not biologically available.

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

CIFTI-FICCI representation on issues encountered for import clearance of 'Flavor preparations at ports'

In the representation, FICCI has raised the obstacles faced by the industries during import clearance, especially for the flavouring substances which are imported as base material to formulate final food products, to FSSAI. FICCI elaborate the difficulties faced at the various port, where FSSAI officials ask the importer to disclose the ingredients of the flavouring substances, even when ingredient declaration as per FSSR regulation appears on label which creates a huge challenge to protect the secrecy of flavouring substances. FICCI also stated the various other issues faced by the importer, which are as follows:

- Clearance officers seek comprehensive details of ingredients in flavour consignments, which is not acceptable and ask for additional documentation on disclosure which leads to trouble for the importer.
- Disclosure of various documents could lead to trade secret exposure risk.
- FSSAI officers ask for sample flavour consignments which may result in a complete waste of consignment given that flavours could be very sensitive to the external uncontrolled environment.

In this regard FICCI request the following:

- Declaration for not containing any prohibited ingredient.
- Clarification regarding the nature of flavour.
- Proper sampling of flavour consignment.

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

FICCI representation on MoFPI letter on latest amendment of the Nutraceutical Regulations

FICCI raised concern on the amendment dated 06 September 2021 related to Nutraceutical regulation with an implementation timeline from 01 April 2022. There are various amendments in this regulation that have far-reaching implications. Since the time provided to comply with these major amendments is just six months, in this regard, FICCI requested to extend the timeline to 01 July 2023 to provide sufficient time and to align with the compliance timeline of RDA. FICCI further raised concerns related to the nutraceutical amendment.

- Currently only 3 solvents (water, ethyl alcohol or hydroalcoholic) are allowed. FICCI requested to align with FSSAI standard and global standards and propose to include more solvents for extraction.
- The amendment de-recognized 50% TULs in Food for Special Dietary Use and Shifted to above RDA only in food formats with FSSAI Authority Approval. FICCI has requested to adopt 50% TULs w/o dosage form restrictions.
- The amendment makes mandatory to add vitamins and minerals in Health Supplement.
- FICCI has requested to retain the existing scope of ingredients i.e., Vit or Min or Botanicals (Sch IV) or Pre-biotics or Pro-biotics.
- The amendment restricts Food for Special Medical Purpose (FSMP) up to 1 RDA. FICCI has requested to retain the existing provision allowing FSMP more than 1 RDA as these products are specially designed to provide nutritional support to persons suffering from a specific disease, disorder.

FICCI also shared the reference of various global regulatory bodies along with their regulatory timeline compliance.

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

CIFTI-FICCI representation on regulatory agenda related to import

In the representation to FSSAI, FICCI raised the below points for further consideration:

- Concerns regarding Certificate of Analysis (CoA) from ISO 17025 accredited labs for testing of Imported Proprietary Foods concerning Indian Food Category 99 products: FICCI stated that category 99 is either 'single materials' or a 'combination of ingredients' shall not come under proprietary foods and should not be covered under the scope of Certificate of Analysis (CoA) criteria from ISO 17025 accredited labs.
- Challenges faced during Import Clearance of Flavour- FICCI requested that the scrutiny of flavour consignments should be

within the regulation and state the following points during Import Clearance of flavour

- FICCI requested to limit the ingredient queries on flavours only up the class category.
- FICCI requested to practice the provision for attaching a separately packed represented sample for FSSAI testing,

- Challenges due to dual usage of substances as food and drug- FICCI raised concerns regarding materials for food usage that are held at import port by drug controller for longer periods that results in hampering the clearance process. FICCI further stated various concerns raised due to this.
- Over scrutiny of R&D samples at Import Port- FICCI raises various concerns to raise for a sample which are imported for R &D like additional document demand and demand for NOC.

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

CIFTI-FICCI representation on draft IS standard on 'Packed Matured Coconut Water-Specification'

In the representation, FICCI submitted the inputs to BIS on IS standard on 'Packed Matured Coconut Water-Specification' as follows:

- FICCI suggested changing the description of Matured Coconut Water and proposed to delete and insert some word to align with the Food Safety and Standards (Food Product and Food Additives) Regulation, 2011 (14.1.2.1 Fruit juices).
- FICCI proposed the deletion of the existing provision that no natural or artificial substance or ingredient shall be added to the coconut water to enhance its quality or preservation and suggest including the statement with harmonizing to the additive provisions with Food Safety and Standards (Food Products Standards and Food additives) Regulations, 2011.
- FICCI proposed to change the requirement value for total soluble solids, total sugars, ash and pH and request to delete the parameters like reducing sugar, sucrose, and specific gravity to align with the Food Safety and Standards (Food Product and Food Additives) Regulation, 2011 (14.1.2.1 Fruit juices).
- FICCI proposed the deletion of the existing provision of Microbiological Requirements for Packed Matured Coconut Water and suggest including the statement with harmonizing to the additive provisions with Food Safety and Standards (Food Products Standards and Food additives) Regulations, 2011.
- FICCI proposed the inclusion of the following statement: 'Provided that for products with a shelf life of more than 3 months, the "DD/MM/YY" format may also be used,' in alignment with the amendment regulations for FSS (Labelling & Display) Amendment Regulations, 2021 dated 29th June 2021 which are being operationalized w.e.f 17.11.2021.
- FICCI proposed the inclusion of some statements to align with the existing Food Safety and Standards (Food Products Standards and Food additives) Regulations, 2011 and Codex General Standard for Fruit Juices and Nectars

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

CIFTI representation on FSSAI Revised Manual of Methods of Analysis of foods – Dairy and Dairy Products

In the representation, FICCI submitted the inputs to FSSAI, Revised Manual of Methods of Analysis of foods – Dairy and Dairy Products as follows:

- FICCI suggested including the Lactometer method IS 10083: 1982 to calculate Solids – Not – Fat to alignment with the BIS standards.
- FICCI proposed a change in the method of preparation of Potassium Acid Phthalate, sodium carbonate solution and sodium chloride solution to avoid any error during the reagent preparation and to make the process easy and pragmatic.
- FICC suggested the inclusion of formula to calculate per cent fat in Butter to retain the formula as mentioned in FSSAI -Manual of analysis of milk and milk products.
- FICCI suggested a change in the formula to calculate Free Fatty acids in Milk Fat Products to align with the FSSAI manual analysis of oils and fats.
- FICCI suggested the inclusion of formula under the Test for Determination of Fatty Acid Composition in Milk Fat Products by Gas-Liquid-Chromatography (GLC) as it works better for separation of cis and trans isomers.
- FICCI suggested including condition under Sample Preparation while weighing sample for Determination of Moisture in Dried Milk Products as Dried Milk products are hygroscopic.
- FICCI suggested inclusions of statements for weave food under the Determination of Total Ash in Dried Milk Products.
- FICCI suggested the inclusion of the formula for Determination of Fat in Whole Milk Powder by Gerber Method to align with the global standards and make the formula clear.

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

FICCI-CIFTI representation related to maximum limit for combination of food colours

In the representation, FICCI stated to FSSAI, the technological challenges faced by the FBOs during 'capping maximum limit to lowest permissible level for a combination of colours' and how it will become a barrier to trade. FICCI shares below points:

- Technological Necessity: Colours being the most important sensory property in food products are used at optimum/ Proportionate amount to achieve the technological purpose. There are common dietary supplements that also allow many of these approved and safe colours at quantum Satis or GMP. In a certain type of product formulation, different colours are required in the outer and inner composition to make a product. However, the colours used are well within the permissible limits as per FSSAI regulations. FICCI further explained that it will be technologically difficult to restrict a limit of different colours when used in combination while formulating the product.
- Risk Assessment Approach by JECFA for allowance of colours: In India consumption of packaged foods can be projected to be much lesser than EU & US which indicates that we have rather lower exposure to colours. The national authorities evaluate detailed risk assessment by JECFA w.r.t safety for individual food colours in food products.
- Global Regulatory References: FICCI clarifies that countries such as the United States, Malaysia, Bangladesh, China, Nepal, Singapore Food Agency, Malaysia and South Korea etc. have no restrictions around the use of a combination of safe & approved food colours. Many countries across the world follow Codex regime/standards and do not have such restrictions

FICCI requested not to limit the 'maximum limit of different colours when used in combination while formulating the product' as the safety of these food colours has been already established.

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

FICCI recommendation on reclassification of BF Slag Freight Class from 140 to 120

Via the representation, FICCI had recommended that the railway freight class for BF slag should be reduced from 140 to 120. This would help in disposal of the material from steel plants and support the cement industry in consuming the alternate products to natural resources. Also, since fly ash and BF slag, both are raw materials for the cement industry, thus the two should have same freight class (fly ash is at 120 freight class). This was submitted to Member (Operations & BD), Railway Board.

For detailed representation, please write to
Mr Arpan Gupta at arpan.gupta@ficci.com

FICCI comments on SOP on verification of IC and ID

Development of indigenous design and indigenous content (IC) is an increasingly important aspect of procurement procedure for enhancing indigenous defence capabilities. To judiciously establish indigenous design and indigenous content, all stakeholders need a clearly defined Standard Operating Procedure as part of procurement process. Towards this goal, the MoD developed draft SOP which lays down the procedure for verification of indigenous design and indigenous content for all categories of procurement.

While positively received by the industry, FICCI has worked with its industry members to suggest amendments to the draft policy to further align it with the DAP2020 and improve Ease of Doing Business without sacrificing the integrity of IC requirement. This was submitted to Additional Secretary and Director General (Acquisition), Dept of Defence, MoD, and Technical Manager (Land Systems), Dept of Defence, MoD.

For detailed representation, please write to
Mr Vivek Pandit at vivek.pandit@ficci.com

Stakeholder consultation for Spacecom policy Oct 2021

Indian Industry welcomes wholeheartedly the Draft Spacecom Policy 2021. Industry recognises that the document has been made with excellent intentions of opening the Space Sector for Private players. With advent of INSPACe, the whole process has been given a wide impetus as well. FICCI scrutinized the document and held consultative sessions on with major industry stakeholders and subject experts. The comments submitted to Dept of Space were made through collaborating the inputs of all such stakeholders. This was submitted to Scientific Secretary, ISRO; Secretary (Personnel), Department of Space and Director, ISRO HQ.

For detailed representation, please write to
Mr Vivek Pandit at vivek.pandit@ficci.com

FICCI suggestions on functioning of ARCs and review of applicable regulatory guidelines submitted

RBI had constituted a committee on functioning of ARCs under chairmanship of Mr Sudarshan Sen, Former ED, RBI. Based on meeting held with Mr Sen, FICCI has submitted additional comments on the subject. This was submitted to Chairman, RBI Committee on ARCs.

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

VOICE OF FICCI

Voice of FICCI is a monthly compilation of all the representations and recommendations of the industry, which FICCI had made / taken up with the Government. The recommendations are mentioned briefly in Voice of FICCI along with the Team Leaders' name and their email ids.

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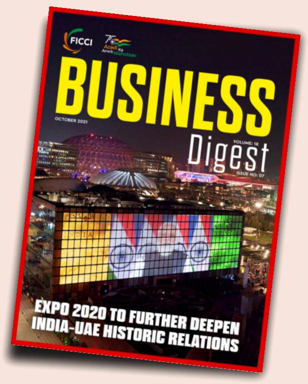

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