VOICE OF FICCI

SHAPING THE AGENDA

August 2025



From the Director General

August 2025 marked a diplomatic milestone for FICCI, with unprecedented international engagement centred on strengthening India's bilateral partnerships whilst simultaneously advancing an extensive domestic policy agenda across multiple sectors.

The highlight of the month was FICCI's participation in the Prime Minister's lunch honouring Philippines President Ferdinand Marcos Jr, followed by a dedicated India-Philippines CEO roundtable co-hosted with DPIIT. President Harsha Vardhan Agarwal, Senior Vice President Anant Goenka, and I engaged in meaningful discussions positioning India as a strategic partner for Philippine businesses.

International diplomacy extended through the India-Russia Business Forum, attended by External Affairs Minister Dr S Jaishankar, and the engagement of the Forum of Parliamentarians with Japan's Ambassador. Further diplomatic interactions included meetings with Dr Mazin Al Masaoodi, Minister Plenipotentiary of the League of Arab States and virtual consultations with India's High Commissioner to Malaysia, BN Reddy.

FICCI's ministerial engagement proved comprehensive, spanning seven Union Cabinet Ministers. Commerce and Industry Minister Piyush Goyal, Women and Child Development Minister Annpurna Devi, Consumer Affairs Minister Prahlad Joshi, Environment Minister Bhupender Yadav, Communications Minister Jyotiraditya Scindia, Power Minister Manohar Lal Khattar, and Railways Minister Ashwani Vaishnaw engaged directly with FICCI leadership on sectoral priorities.

High-level bureaucratic meetings encompassed Cabinet Secretary T V Somanathan, Foreign Secretary Vikram Misri, Economic Affairs Secretary Anuradha Thakur, Commerce Secretary Sunil Barthwal, Corporate Affairs Secretary Deepti Gaur Mukerjee, Commerce Special Secretary Rajesh Agrawal, MSME Additional Secretary Dr Rajneesh, MeitY Additional Secretary Abhishek Singh, DGFT Additional Secretary Ajay Bhadoo, DPIIT Secretary Amardeep Singh Bhatia, and DGTR Director General Sidharth Mahajan. Strategic policy discussions included NITI Aayog Member Rajiv Gauba, CEO BVR Subrahmanyam, Principal Scientific Adviser Prof Ajay Kumar Sood, and PMO Additional Secretary Ashish Vachhani.

Financial sector engagement featured meetings with RBI Governor Sanjay Malhotra, SEBI Chairman Tuhin Kanta Pandey, and Principal Secretary to PM Shaktikanta Das, reinforcing FICCI's central role in monetary and capital market policy dialogue.

In parallel with these engagements, FICCI submitted twenty-seven comprehensive policy recommendations addressing business challenges. Healthcare advocacy dominated submissions, with detailed representations on MedTech regulations covering GeM portal issues, medical device standards migration, warehouse labelling permissions, hazardous waste exemptions, and titanium powder import facilitation, and promoting India as a global healthcare destination.

Tax policy recommendations were extensive, covering GST rationalisation under GST 2.0. The federation recommended enhancing rail freight competitiveness during the busy season by waiving surcharges and eliminating mini surcharges.

Trade policy submissions addressed concerns regarding India-EU Rules of Origin, ASEAN product-specific rules for chemicals, and the VSF product negative listing under the AITIGA review. FICCI's chemical sector advocacy included precious metal catalyst re-import duty waivers and R&D expenditure documentation.

Food standards engagement encompassed multiple FSSAI submissions, including monographs on steviol glycosides, product standards for makhana, regulations for coffee-chicory mixtures, and Legal Metrology rules for packaged commodities. Additional CODEX cell submissions reinforced India's position in the development of international food standards.

Financial services submissions addressed SEBI's related party transaction amendments, concerns regarding unlisted GDRs, and revisions to the definition of a startup, demonstrating FICCI's comprehensive approach to capital market development.

This intensive month reinforced FICCI's unique positioning as India's premier industry advocate, simultaneously advancing bilateral partnerships while delivering detailed, sector-specific policy solutions that address India's evolving economic landscape.

Jyoti Vij

Seeking Intervention & Support for issues with GeM Portal for MedTech Companies - Vendor Assessment Exemption (VAE) Process and Reactivation of OEM Accounts

FICCI requested for intervention with GeM authorities to address critical roadblocks faced by MedTech companies in completing the Vendor Assessment Exemption (VAE) on the GeM portal. Persistent delays, excessive documentation, lack of industry alignment, and non-interactive procedures by the assessment agency have disabled OEM accounts, disrupting business and medical supply continuity nationwide. FICCI recommended reactivation of OEM accounts to avoid business disruptions., 12-week extension for VAE completion for MedTech firms with turnover above ₹500 Crore, streamlining documentation in line with MDR, 2017, with industry consultation, mandating interactive resolution mechanisms with RITES to expedite assessments. This was submitted to the Joint Secretary, Department of Pharmaceuticals, Government of India.

For detailed recommendation, please write to
Ms Shilpa Sharma at shilpa.sharma@ficci.com

FICCI recommendation on the proposed migration of CRO IS 13252 (Part 1):2020 and IS 616:2017 to IS/IEC 62368-2023

FICCI recommended Grandfathering existing registered products/components under previous standards to safeguard ongoing clinical operations, Exempting EoL/EoS service parts from new requirements for the duration of service commitments, exempting custom-designed, non-commercial parts integral to certified medical devices from IS/IEC 62368-1, Maintaining a minimum three-year transition period and parallel acceptance of legacy standards for service parts. This was submitted to the Scientist-G & Group Coordinator, IPHW, Ministry of Electronics & Information Technology (MeitY), Government of India.

For detailed recommendation, please write to
Ms Shilpa Sharma at shilpa.sharma@ficci.com

Request for Written Permission for Labelling of Medical Devices in Warehouses under Rule 11 of Plastic Waste Management (PWM) Rules, 2016

FICCI urged ministry to address operational challenges faced by the MedTech industry due to overlapping labelling provisions in PWM and MDR,

and request Issuing a written clarification permitting required PWM labels to be affixed at licensed warehouses or distribution centres, in addition to manufacturing sites, in alignment with Rule 104A for drugs to support supply chain continuity, minimize risk of disruption, 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.

ensure continued access to medical devices across India. This was submitted to the Joint Secretary, Ministry of Environment, Forest and Climate Change (MoEFCC), Government of India.

For detailed recommendation, please write to
Ms Shilpa Sharma at Shilpa.sharma@ficci.com

Seeking exemption/clarification for the Medical Device Industry under the Hazardous and Other Wastes (Management and Transboundary Movement) Amendment Rules, 2025

Request to address challenges posed by the Hazardous and Other Wastes (Management and Transboundary Movement) Amendment Rules, 2025, particularly EPR for non-ferrous metals. FICCI urged MoEFCC to clarify the scope of Hazardous Waste EPR rules for medical devices already covered under E-Waste Rules to prevent double reporting, Grant a blanket exemption for medical devices from mandatory use of recycled non-ferrous metals under Rule 51(3), considering safety and regulatory constraints, Ensure avoidance of dual EPR targets and registrations for the same products across both regulatory frameworks, Develop harmonized compliance mechanisms, including unified reporting formats and digital integration across CPCB portals, Establish a joint task force with relevant authorities and industry bodies to create sector-specific implementation guidelines. This was submitted to the Secretary, Ministry of Environment, Forest and Climate Change (MoEFCC), Indira Paryavaran Bhavan, New Delhi.

For detailed recommendation, please write to
Ms Shilpa Sharma at Shilpa.sharma@ficci.com

Request for Reduction of GST Rates on Spectacles and Vision Correction Eyewear

Reduction of GST on corrective spectacles, lenses, and frames from 12% to 5%, recognizing them as essential health aids. This was submitted to the JS (TRU-I), CBIC, Ministry of Finance, New Delhi.

For detailed recommendation, please write to
Ms Shilpa Sharma at shilpa.sharma@ficci.com

Request for Exemption/Removal of Medical-Grade Titanium Powder from Restricted Import List and Hazardous Wastes Rules

Request to exempt medical-grade titanium powder from DGFT's restricted import list and Hazardous Waste Rules and urged streamlining import approvals by allowing DGFT to issue licenses directly to CDSCO-licensed manufacturers via the Sugam portal or issuing a joint exemption notification. This will ease supply bottlenecks, support 'Make in India,' and enhance timely access to vital implantable medical devices. This was submitted to the Joint Secretary, Department of Pharmaceuticals, Ministry of Chemicals & Fertilizers, Government of India.

For detailed recommendation, please write to
Ms Shilpa Sharma at shilpa.sharma@ficci.com

FICCI's submission on Industry Concerns regarding Overcharging/Demand Notices

FICCI had submitted detailed recommendations on industry concerns regarding overcharging and demand notices. The FICCI Pharma Committee's task force on "Pricing & Policy" had actively engaged in deliberating key challenges and exploring reforms in pharmaceutical pricing and market access. The recommendations highlighted issues such as preliminary overcharging, show-cause notices, and demand notices being issued to member companies, which created uncertainty and compliance burdens for the industry. Through these submissions, FICCI had presented Industry Suggestions and Recommendations for the consideration of NPPA and strongly advocated for enhancing the Ease of Doing Business and establishing a predictable, transparent policy environment. Additionally, FICCI had requested a structured stakeholder consultation with industry leaders and policymakers to resolve these concerns, with the objective of developing a balanced pricing framework that encouraged innovation, safeguarded consumer interests, and ensured sustainable growth of the pharmaceutical sector. These were submitted to the Chairman, National Pharmaceutical Pricing Authority (NPPA).

For detailed recommendation, please write to
Mr Ishan Pandita at ishan.pandita@ficci.com

Comprehensive Recommendations for Promoting India as a Global Healthcare Destination & Advancing MVT

FICCI recommends a unified set of measures to position India as a leading global hub for Medical Value Travel. Key recommendations include: (i) Government-led branding campaigns to enhance India's visibility; (ii) Financial assistance and grant mechanisms for patients from emerging markets; (iii) "Train in India" programs for foreign doctors and nurses, creating global goodwill and referral networks; (iv) Quality accreditation standards (via NABH) for international patient care; (v) A National MVT Policy for coordinated growth; (vi) Streamlined medical visa facilitation with e-visas and fast-track processing; (vii) Deployment of MVT officers in missions abroad to strengthen outreach; (viii) Setting up MVT facilitation centres at airports for seamless patient arrival; (ix) Expanding direct flight connectivity from high-potential regions; (x) Exploring money deposit mechanisms with Indian banks for patients; (xi) Structured data collection via hospitals, FRRO, and missions; and (xii) Leveraging schemes like MAI to support international promotion through RBSMs and delegations. Together, these measures will strengthen India's image, attract more patients, and advance healthcare diplomacy. These were submitted to the Joint Director General, Ministry of Tourism.

For detailed recommendation, please write to
Mr Ishan Pandita at ishan.pandita@ficci.com

Rationalization of GST on Packaged Food Products

Issue - Need for rationalisation of the Goods and Services Tax (GST) structure applicable to packaged food products.

Background - The food processing industry is one of the most important sectors in India considering its linkage to agriculture and food consumption. In the entire value chain farmers, transporters and companies play a significant role to ensure the delivery of final product to the end consumer. The backward and forward linkages of the industry create an extensive ecosystem which makes the industry one of the key supporters of the economy. This industry drives significant indirect employment and investment across its support ecosystem. Sectors such as packaging, logistics, warehousing, transportation, and equipment manufacturing all benefit from the industry's presence, The industry's contribution also extends to investments in cold storage, quality control, and distribution networks, further broadening the employment base. This sector also contributes to Indian exports, provides financial security to farmers and has a major share in GDP.

Recommendation – It is, therefore, recommended that in light of the proposed rate rationalization measures (with respect to removal of the 12% slab) which are being undertaken by the Government, all packaged food products should be placed at the lower GST rate i.e. 5% basis the current slab rates along with input tax credit (or lower than 12% in case of any changes in the structure). Any potential increase, even if marginal, is likely to have a significant detrimental impact on the industry on various aspects. A lower GST rate will ease the tax burden on end consumers, enhance affordability, and provide a much-needed boost to demand and formalisation within the sector. This was submitted to the Chairperson, Central Board of Indirect Taxes and Customs, Department of Revenue, Ministry of Finance.

For detailed recommendation, please write to
Ms Ira Khanna at ira.khanna@ficci.com

Representation regarding GST Clarification Sought on Development Rights in JDAs

Issue - Issue is being faced by the companies engaged in commercial construction and leasing of properties.

Background - India's commercial construction industry across the major metropolitans, including Delhi-NCR, Hyderabad, Bangalore, Chennai, Mumbai, Ahmedabad and Pune, has been showing a jump year on year, in the past 5 years. This sector is witnessing growth, significantly driven by the establishment of Global Capability Centers. These centers rely on leased commercial infrastructure, where rental affordability is key factor. However, high cost of leasing and denial of Input Tax Credit and ambiguity surrounding around treatment of Joint Development Agreements under GST regime, is adversely affecting the affordability of commercial spaces.

Under a typical JDA, a landowner grants the right to develop their land to a developer, in return for a share in the constructed area or consideration. While the developer discharges GST on construction services rendered to the landowner, GST authorities are also alleging to levy GST separately on the transfer of 'Right to Develop', treating it as a Transferable Development Right [TDR]. It may be noted that the 'Right to Develop' granted under JDA is contractually derived and does not constitute TDR or Floor Space Index [FSI] granted by competent authority.

It may also be noted that courts in various decisions have analyzed the scope of "benefits arising out of land" and recognize both the 'Right to Develop' and TDRs as benefits arising out of land and hence part of immovable property, which is outside the scope of GST.

Recommendation – Development Rights, TDR and FSI are benefits arising out of land and

it is, therefore, recommended that these may be excluded from GST under Entry 5 of Schedule III of the GST Act. This seeks to bring clarity, promote ease of doing business, and support infrastructure-driven economic growth. This was submitted to the Joint Secretary, Tax Policy and Research Unit (TPRU), Department of Revenue, Ministry of Finance.

For detailed recommendation, please write to
Ms Ira Khanna at ira.khanna@ficci.com

Representation on Rationalization of GST Rates in the Automobile Sector

Issue - Aligning GST on Motor Vehicles, Motor Vehicle Parts and Electric Vehicle Components

Background - The automobile industry is a critical contributor to India's manufacturing sector, employment, and economic growth. Rate rationalisation on vehicles and its parts will improve affordability for consumers and state transport bodies, will correct inverted duty structures, ease cash flows, and reduce compliance challenges, Reduced rates on EV components will accelerate India's transition to sustainable mobility and contribute to national climate goals.

Motor Vehicles (Passenger, Goods, and Chassis) – These are currently taxed at 28%, placing them in the highest slab. Motor Vehicle Parts - Essential parts (HSN 87089900) are also taxed at 28%, leading to higher costs and inverted duty structures. Electric Vehicle Components - While final EVs are taxed at 5%, most key EV parts such as motors, controllers, inverters, charging equipment, electrical lighting and signalling and batteries are taxed at 18%, creating inverted duty structures. Addressing these concerns will not only support the industry but also benefit consumers, promote clean mobility, and further the Government's vision of sustainable and affordable transportation.

Recommendations:- In view of the above, it is recommended i] tax reduction to 18% on Motor Vehicles (Passenger, Goods, and Chassis), to make public transport, goods movement, and logistics more affordable, thereby supporting state undertakings and industrial growth; ii] tax reduction to 18% on Motor Vehicle Essential parts (HSN 87089900) to ease production costs and support competitiveness; and iii] aligning GST on EV parts with EVs at 5% to promote wider adoption of clean mobility. This was submitted to the Joint Secretary (TRU-I), Central Board of Indirect Taxes and Customs, Ministry of Finance.

For detailed recommendation, please write to
Ms Ira Khanna at ira.khanna@ficci.com

Request for Inclusion of Water Purifiers, Filters & Services under 5% GST Slab to Promote Preventive Public Healthcare

Issue - Higher GST rate on water purifiers, filters, and related services.

Background/Rationale for bringing down the GST rate:-

- Access to Clear Water - Clean and safe drinking water is a fundamental need. The Central Ground Water Board's Annual Ground Water Quality Report, 2024 highlights alarming contamination levels posing serious health risks.
- Preventive Healthcare - Ensuring safe drinking water aligns with the Government's focus on preventive healthcare under the National Health Policy.

Low Penetration - Household penetration of water purifiers in India is only ~6%, mainly due to high consumer prices under the current 18% GST.

- Environmental Benefits - A single purifier can replace ~12,000 plastic bottles annually, reducing plastic waste and LPG usage for boiling water.
- Minimal Revenue Impact - The current market size of water purifiers is approximate ₹4,400 crore. Reduction in GST will have negligible impact on government's revenue, however, it will have a significant benefit of providing safe drinking water to a large number of households.

Recommendation – Lowering GST will improve affordability, adoption, and reduce downstream healthcare costs. This step will also strengthen the Government's vision of Har Ghar Jal, reduce waterborne diseases, and contribute to Swachh Bharat, Swasth Bharat, Samriddh Bharat. It is,

therefore, recommended that i] Reclassify water purifiers, filters and related services under the 5% GST slab (Chapter 8421 of the Customs Tariff Act) in recognition of their essential role in public health by ensuring safe drinking water; and ii] Treat them on par with other essential mass-consumption items, ensuring affordability and wider adoption. This was submitted to the Joint Secretary (TRU-I), Central Board of Indirect Taxes and Customs, Ministry of Finance

For detailed recommendation, please write to
Ms Ira Khanna at ira.khanna@ficci.com

Recommendation to Enhance Rail Freight Competitiveness and Promote Modal Shift

FICCI welcomes the proactive initiative of the Ministry of Railways in waiving the Busy Season Surcharge on commodities transported in covered wagons during August–September 2025. This measure is expected to provide cost relief to industries, enhance freight competitiveness, and encourage a modal shift from road to rail, thereby improving overall supply chain efficiency.

In continuation of these efforts, and after extensive consultations with industry stakeholders, FICCI has submitted recommendations aimed at further enhancing rail freight movement and tonnage:

Continuation of Busy Season Surcharge Waiver: Extending the waiver across all wagon types and commodities will strengthen rail's competitiveness, optimise asset utilisation, and support sustainability objectives, including reduced road congestion and lower emissions.

Waiver of Mini and Two-Point Surcharges: Removing these charges will improve rail accessibility for smaller consignments, enhance last-mile connectivity, and make rail economically viable in fragmented markets.

Review of Short-Lead Freight Rates: Rationalising freight charges for distances under 350 km will align rail costs more closely with road transport, encouraging a modal shift and efficient use of railway infrastructure.

Additionally, FICCI has suggested a customer-centric approach for the Station-to-Station (STS) Scheme to promote long-term partnerships, retain traffic, and encourage incremental volumes.

FICCI remains committed to collaborating with the Ministry to make rail a preferred, sustainable, and competitive mode of transport, and is ready to facilitate industry discussions to support these initiatives. These were submitted to the EDTC (Rates), Ministry of Railways, New Delhi.

For detailed recommendation, please write to
Ms Komal Sharma at komal.sharma@ficci.com

Representation regarding GST Clarification Sought on Development Rights in JDAs

The Indian commercial construction sector is witnessing robust growth, significantly driven by the establishment of Global Capability Centers (GCCs). These centers rely on leased commercial infrastructure, where rental affordability is a key factor. However, the high cost of leasing compounded with denial of Input Tax Credit (ITC) and ambiguity surrounding around treatment of Joint Development Agreements (JDAs) under GST regime, is adversely affecting the affordability of commercial spaces — a key consideration for GCCs choosing India as a destination.

Under a typical JDA, a landowner grants the right to develop their land to a developer, in return for a share in the constructed area or consideration. While the developer discharges GST on construction services rendered to the landowner, GST authorities are also alleging to levy GST separately on the transfer of 'Right to Develop', treating it as a Transferable Development Right (TDR) under Entry No. 5B of Notification No. 5/2019- Central Tax (Rate) dated March 29, 2019. It may be noted that the 'Right to Develop' granted under a JDA is contractually derived and does not constitute a TDR or Floor Space Index (FSI) granted by a competent authority.

It may be noted that courts in various decisions have analyzed the scope of "benefits arising out of land" and recognize both the 'Right to Develop' and TDRs as benefits arising out of land and hence part of immovable property, which is outside the scope of GST.

Accordingly, development rights, TDR, and Floor Space Index (FSI) are benefits arising out of land and it is requested that these may be excluded from GST under Entry 5 of Schedule III of the GST Act. This recommendation seeks to bring clarity, promote ease of doing business, and support infrastructure-driven economic growth. These were submitted to the Joint Secretary, Tax Policy and Research Unit (TPRU), Department of Revenue, Ministry of Finance, Government of India.

For detailed recommendation, please write to
Ms Komal Sharma at komal.sharma@ficci.com

SEBI Consultation Paper on Amendments to provisions relating to related party transactions under SEBI (LODR) Regulations, 2015 and circulars thereunder

Based on feedback received from members, FICCI submitted suggestions on the SEBI Consultation Paper proposing amendments to the regulatory framework governing RPTs. These proposals aim to enhance transparency, reduce compliance burden and align Indian practices with global standards. The consultation paper reflects SEBI's ongoing efforts to balance investor protection with ease of doing business, especially in light of evolving corporate structures and increasing inter-company transactions.

For detailed recommendation, please write to
Mr Santosh Parashar at santosh.parashar@ficci.com

FICCI Representation on concerns related to Unlisted GDRs

Based on concerns highlighted by members on minority non-resident holders of unlisted GDRs facing challenges while exiting their investments, FICCI made a submission to the Secretary, DEA, that companies be allowed to nominate a resident buyer to purchase the underlying shares, with complete disclosures, ensuring an orderly exit and preserving investor confidence.

For detailed recommendation, please write to
Mr Santosh Parashar at santosh.parashar@ficci.com

Request to place VSF products in negative list under AITIGA review

FICCI submitted the issue regarding the import of Viscose Staple Fibre (VSF) under the ASEAN-India Trade in Goods Agreement (AITIGA), which is posing challenges to the Indian Viscose Industry.

ASEAN countries, particularly Indonesia and Thailand have built significant excess capacity and are leveraging preferential trade agreement to push exports into India.

FICCI has requested the government to consider placing VSF products in the Negative List (with 5% Basic Customs Duty) under the ongoing

AITIGA review. This was submitted to the Additional Secretary, Department of Commerce, Ministry of Commerce and Industry, Government of India.

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

FICCI Inputs on Revision of Startup Definition

FICCI Inputs on Revision of Startup Definition mentioned below were submitted to DPIIT.

1. Adequacy of Eligibility Criteria

   The proposal to extend the age limit to 15 years and raise the turnover threshold to ₹250 crore recognizes longer growth cycles, especially for research-intensive and deep-tech ventures. However, this may dilute the spirit of startups as agile, early-stage ventures. A balanced approach could retain the higher limits but introduce qualifiers to ensure benefits reach high-impact startups. Suggested qualifiers include patent filing/grant, demonstrable use or development of new technologies, generation of high-skill jobs, and activity in specified deep-tech sectors such as AI, quantum, and advanced materials.

2. Inclusion of Entity Types

   Expanding eligibility to cooperative societies is a positive, inclusive step that can broaden innovation. For effective implementation, such entities should be integrated into the Startup India framework through registration with central or state registrars linked to the Startup India database. For existing forms like private limited companies, LLPs, and partnerships, the current system should continue seamlessly.

3. Implementation, Verification & Data Sharing

   The broadened scope requires stronger verification systems. This calls for robust inter-agency data exchange (e.g., MCA for companies, cooperative registrars for co-ops) and clear compliance protocols to avoid ambiguity.

For detailed recommendation, please write to
Mr Akhil Gupta at akhil.gupta@ficci.com

Waiver of import duty on re-import of USED industrial Precious Metal Catalyst

The inputs on waiver of import duty on the re-import of used industrial Precious Metal Catalysts (HSN Code: 71151000) were submitted to Department of Chemicals and Petrochemicals. The chemical industry has sought a waiver of import duty on the re-import of used industrial Precious Metal Catalysts (HSN Code: 71151000). These catalysts, containing Platinum Group Metals (PGMs), are periodically exported for refurbishment to global suppliers such as Heraeus, Johnson Matthey, Umicore, BASF, and others, before being re-imported for reuse. With large quantities of precious metals involved—valued at several hundred crores—this structured export–refurbishment–reimport mechanism is critical for ensuring longer catalyst life, better process efficiency, and alignment with global best practices. At present, such refurbished catalysts do not enjoy duty concessions, and the proposal seeks a systematic waiver to reduce costs, sustain operations, and enhance industry competitiveness.

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

Inputs on the India-EU Rules of Origin

The inputs outlined key industry concerns and suggestions regarding the India-EU Rules of Origin (RoO) framework. It highlighted concerns regarding restrictive product-specific rules (PSRs) for chemicals such as mannitol, glycerol, textile finishing agents, industrial fatty acids, and sorbitol. The industry argues that exclusions on certain non-originating raw materials (like starches, sugars, and oils) undermine India's ability to source globally and add value domestically, given the reliance on imported feedstocks due to local shortages or cost factors. The industry recommends replacing restrictive provisions with more flexible value-based rules (MaxNOM of 50%) to ensure that genuine manufacturing activity in India qualifies for originating status. Overall, the inputs emphasize retaining sourcing flexibility, enhancing compliance feasibility, and preventing trade diversion, thus supporting the growth of India's chemical manufacturing ecosystem. This was submitted to the Department of Chemicals and Petrochemicals.

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

Inputs on the India-ASEAN Product Specific Rules (PSR) and on the ASEAN proposed co-equal rules (CTSH or 40%) for tariff lines under Chapters 27-39 (002)

The inputs on ASEAN's proposal for co-equal Product Specific Rules (CTSH or 40% value addition) under the India-ASEAN Trade in Goods Agreement (AITIGA), with particular reference to Phthalic Anhydride (HS Code 29173500) were submitted to Department of Chemicals and Petrochemicals. The Indian industry, having invested heavily to expand capacity from 300 KTA in 2020 to 645 KTA in 2024 at a cost of INR 2000 crores, has shifted from being a net importer to a net exporter. However, it faces significant competitive pressure due to surplus production in ASEAN countries such as Thailand, Indonesia, and also from Korea and China. To safeguard domestic producers, the industry requests that Phthalic Anhydride be classified under the Sensitive Track with a 5% duty for ASEAN imports and that strict rules of origin (CTSH or 40% value addition) be maintained to prevent trade diversion and protect India's growing capacity.

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

Inputs on the details of expenditure incurred on R&D activities

Industry inputs on R&D expenditure in the chemicals and petrochemicals sector for FY 2023–24 and FY 2024–25 were submitted to Department of Chemicals and Petrochemicals. It shows a clear trend of increasing investments in research and development, covering areas such as refining, petrochemicals, lubricants, alternative energy, sustainability, as well as pilot lines, testing infrastructure, modernization, and process improvements. The inputs highlight the sector's focus on strengthening innovation capacity, adopting advanced technologies, and supporting long-term competitiveness through higher R&D spending.

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

Import surge note (April-June 2025-26)-Interim report

The interim report highlights an import surge in select chemical compounds during April–June 2025–26, reflecting volatility in global supply chains and trade policies. Production of key inputs is

concentrated in limited geographies and influenced by local regulations, taxes, and tariff revisions, particularly affecting cost viability and availability. Added to this, uncertainties in logistics and global market dynamics have disrupted supply stability, prompting higher precautionary imports to ensure security of raw materials. The report suggests that a year-on-year review over a longer period would provide clearer insights into emerging trends and the sustainability of these shifts. This was submitted to the Department of Chemicals and Petrochemicals.

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

CIFTI submission on Clarifications sought by Scientific Panel members in respect to the request for adoption of monograph on Steviol Glycosides (derived from extraction, fermentation, enzyme modification and enzyme glucosylation)

In the representation CIFTI submitted the response to FSSAI, on various clarifications sought by Scientific Panel members in respect to the request for adoption of monograph on Steviol Glycosides (derived from extraction, fermentation, enzyme modification and enzyme glucosylation).

For detailed representation, please write to
Mr Hemant Seth at hemant.seth@ficci.com

Draft Standards of Makhana Products

In the shared representation, CIFTI submitted comments to FSSAI on the Draft Standards of Makhana Products including the definitions and various quality parameters.

For detailed representation, please write to
Mr Hemant Seth at hemant.seth@ficci.com

Agendas "BIS food standard (Green Coffee)" & "Proposal to decrease the chicory content in Coffee-Chicory mixture (2.10.4)"

In the submitted representation FICCI shared comments to FSSAI on Agendas "BIS food standard (Green Coffee)" & "Proposal to decrease the chicory content in Coffee-Chicory mixture (2.10.4)", wherein FICCI requested the panel to retain the current percentage of coffee and chicory content in coffee-chicory mixture and proposed to delete caffeine content and amend moisture content for monsooned Malabar coffee.

For detailed representation, please write to
Mr Hemant Seth at hemant.seth@ficci.com

FICCI comments on First Circular of the EWG on the GSFA to the 56th CCFA

FICCI CODEX cell submitted comments to NCCP on the First Circular of the EWG on the GSFA to the 56th CCFA.

For detailed representation, please write to
Mr Hemant Seth at hemant.seth@ficci.com

CIFTI-FICCI Letter regarding omitted Second Schedule related to commodities to be packed in prescribed quantities under the Legal Metrology (Packaged Commodities) Rules, 2011

The representation was submitted with reference to the National Stakeholder Consultation on Food Labelling, Advertisement, and Claims, held by FSSAI on 13th August 2025. While the initial debate focused on the edible oil sector, there is growing concern that similar measures may be extended to other product categories.

We submitted that the reinstatement of the Second Schedule poses significant challenges. Standardizing pack sizes could constrain product innovation, limit consumer choice, and create operational inefficiencies. Rigid pack size mandates may also conflict with global trade norms, raising WTO concerns, and potentially reduce affordability and accessibility for consumers. This was submitted to the Ministry of Consumer Affairs.

For detailed representation, please write to
Mr Hemant Seth at hemant.seth@ficci.com

Please share your valuable feedback at:
https://meet.ficci.in/voiceofficci/survey.asp

For more details, contact:
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