VOICE OF FICCI

SHAPING THE AGENDA

October 2025



From the Director General

October 2025 marked a significant organisational milestone as FICCI announced Anant Goenka as President-Elect for the 2025-26 term, succeeding President Harsha Vardhan Agarwal. This transition underlines strategic continuity in leadership as the Chamber prepares for its next phase of policy advocacy and institutional growth.

The month saw significant ministerial engagement. Led by President Harsha Vardhan Agarwal we met the Minister of Agriculture and Farmers Welfare and Rural Development, Shivraj Singh Chouhan, Petroleum and Natural Gas Minister Hardeep Singh Puri, and Labour and Employment Minister Mansukh Mandaviya. We also attended the banquet hosted by the Honourable Prime Minister in honour of His Excellency Khurelsukh Ukhnaa, President of Mongolia.

International diplomacy was extensive, including meetings with the Prime Minister of Sri Lanka, Egypt's Foreign Affairs Minister Dr Badr ABDELATY, Afghanistan's Foreign Minister Mawlawi Amir Khan Muttaqi, Luxembourg's Ambassador-designate Christian Biever, Russian Ambassador Denis Alipov, and New Zealand High Commissioner Patrick John Rata.

Bureaucratic engagements included Financial Services Secretary M Nagaraju, New and Renewable Energy Secretary Santosh Kumar Sarangi, Mines Secretary Piyush Goyal, Commerce Secretary Rajesh Agarwal, Revenue Secretary Arvind Shrivastava, MSME Secretary S C L Das, and Joint Secretary (South America) Dr K M Praphulla Chandra Sharma.

Our policy advocacy encompassed twenty-four comprehensive interventions across various sectors.

Recommendations on intellectual property addressed the overlap between design and copyright, proposing an unregistered design rights modelled on UK frameworks that offer three-year automatic protection for short-life products. Additionally, amendments to the Copyright Act aim to strengthen criminal enforcement against digital piracy by making infringement cognisable and non-bailable.

Healthcare and medical device submissions were extensive, covering MDTAG inputs to CDSCO for streamlining post-approval procedures, critical minerals information for medical applications, import duty hikes on dialysis machines from 7.5 to 15-20 per cent supporting Make in India, stakeholder consultations on the PC-PNDT Act, and feedback on the CGHS rates framework. Three strategic papers were submitted: FICCI-EY Parthenon's True Accountable Care framework, FICCI-Chase Advisors' Longevity Dividend addressing active ageing, and FICCI-KPMG's AI in Healthcare transformation roadmap.

Aviation sector-specific advocacy addressed concerns related to the Civil Drone Bill 2025, while we submitted inputs to the Department of Chemicals on the impacts of mercury phase-out under the Minamata Convention, frameworks for developing chemical parks and evaluation criteria, quality control orders for polypropylene, environmental SOPs for hazardous wastes, and potential identification of domestic manufacturing products.

Financial services submissions encompassed suggestions on Multi-Disciplinary Partnership firms' consultation, detailed representations to the Select Committee on the IBC Amendment Bill 2025, and follow-up compliance recommendations under various SEBI regulations covering PIT, LODR, and ICDR requirements.

Trade facilitation included comprehensive India-Belgium bilateral analysis submitted to the Embassy in Brussels and the MEA Secretary (West), highlighting significant growth potential beyond the current USD 12.9 billion bilateral trade.

Pharmaceuticals advocacy addressed Minimum Import Price concerns for Potassium Clavulanate, recommending implementation only after adequate domestic capacity establishment. Critical Biological Diversity Amendment Act 2023 representations to the Minister of Ayush and NBA highlighted ambiguities regarding codified traditional knowledge exemptions and disproportionate compliance burdens on Ayush manufacturers.

These submissions demonstrate FICCI's unwavering commitment to promoting dialogue between industry and government, enhancing India's competitiveness across key sectors, while ensuring regulatory frameworks balance development with accountability.

Jyoti Vij

FICCI comments on overlap between design and copyright: Proposed amendments to the Designs Act and the Copyright Act

These recommendations address the overlap between copyright and design protection in India. The Copyright Act, 1957 protects artistic works, while the Designs Act, 2000 protects visual features applied to industrial products, and Section 15 already removes copyright once a design is registered or commercially reproduced at scale. Courts, including the Supreme Court in Cryogas Equipment Pvt. Ltd. v. Inox India Ltd. (2025), have clarified a two-step test to distinguish between artistic creations and functional industrial designs, ensuring that purely functional works do not receive copyright protection. Given this legal clarity, broad amendments to the Copyright Act and Designs Act are not considered necessary.

However, the recommendations identify a remaining gap in protection for short-life design products like apparel, fashion accessories, toys, and décor, which often bypass registration and are prone to rapid copying. To address this, is proposed introducing an unregistered design right modeled on the UK Supplementary Unregistered Design framework, granting automatic protection for 2D and 3D appearance features for three years from first public disclosure. This would be enabled through a new chapter in the Designs Act with a focused definition covering only non-functional visual characteristics, along with a pre-registration opposition mechanism similar to trademark procedures. These amendments would boost enforcement for design-led industries, promote fair competition, and ensure alignment between copyright and design laws by making corresponding updates to Section 15 of the Copyright Act. These were submitted to DPIIT.

For detailed recommendation, please write to

Ms Ruchita Singh at ruchita.singh@ficci.com

FICCI recommendations on key provisions discussed at the DPIIT stakeholder consultation on the amendment of the Copyright Act, 1957

These recommendations respond to DPIIT's stakeholder consultation on the proposed amendment of the Copyright Act, 1957, recognizing that India's audiovisual and digital content industries contribute significantly to the economy and employment, yet continue to face large-scale revenue losses due to piracy, malware risks, and cybercrime associated with pirate platforms that monetize illegitimate user traffic through malicious advertising and data exploitation. They urge DPIIT not to dilute penal provisions and instead reinforce criminal enforcement, given the organized nature of piracy networks, including

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.

by amending Section 63 to explicitly classify infringement as a cognizable, non-bailable offence, increasing punishments for repeat offenders, retaining penalties under Section 68, introducing statutory damages to strengthen civil enforcement, and linking confirmed infringement penalties to credit reporting systems to ensure real-world economic deterrence. The recommendations further call for enhanced protection of Technological Protection Measures and Rights Management Information under Sections 65A and 65B by including both criminal and civil remedies, clearer definitions, removal of vague exceptions, and explicit liability for app stores distributing piracy-enabling applications. A clarificatory amendment to the "fair use" marriage-related exception under Section 52(1)(za) is also proposed to avoid commercial misuse. Together, these measures aim to equip India's copyright framework with modern enforcement tools that protect creators, consumers, and national economic interests in an increasingly digital environment.

For detailed recommendation, please write to

Ms Ruchita Singh at ruchita.singh@ficci.com

Meeting of Medical Device Technical Advisory Group (MDTAG)

FICCI had submitted inputs to CDSCO for the next MDTAG meeting, emphasizing the need to simplify post-approval change processes for medical devices, allow notifications for minor modifications, and harmonize grouping guidelines with global standards. Issues such as customs delays, portal and certification challenges, expedited review for COVID-19 products, and specific IVD regulatory bottlenecks were also highlighted. These were submitted to the Drugs Controller General (India), Central Drugs Standard Control Organization (HQ).

For detailed recommendation, please write to

Ms Shilpa Sharma at shilpa.sharma@ficci.com

FICCI inputs regarding information related to critical minerals

FICCI has compiled and submitted detailed inputs to the MediTech Policy Section, Department of Pharmaceuticals in response to the Office Memorandum from the Ministry of Mines under the National Critical Minerals Mission (NCMM). The inputs highlight the usage patterns of key critical minerals within the health and medical device sector, specifying applications such as X-ray tube windows, batteries, and medical implants. The submission addresses requirements, sources (domestic/imported), import forms, and relevant policy initiatives for all the identified 24 critical minerals.

For detailed recommendation, please write to

Ms Shilpa Sharma at shilpa.sharma@ficci.com

Proposals concerning import duties on medical devices, along with detailed justifications

FICCI collated and submitted proposals concerning import duties on medical devices for upcoming budget session, including increasing the import duty on dialysis machines—especially those imported from China—from 7.5% to 15–20%. This will safeguard domestic manufacturers, promoting the "Make in India" initiative, and will reduce reliance on imported equipment in critical healthcare segments. These were submitted to the MediTech Policy Section, Department of Pharmaceuticals.

For detailed recommendation, please write to

Ms Shilpa Sharma at shilpa.sharma@ficci.com

Request for stakeholder consultation and meeting on the implementation of the PC PNDT Act, 1994

FICCI requested MoHFW that the Ministry convene a stakeholder consultation to address field challenges in PC-PNDT Act implementation, harmonize state practices, modernize compliance with digital solutions, and establish a centralized portal for managing diagnostic equipment. This was submitted to the Secretary, Ministry of Health & Family Welfare (MoHFW), Government of India.

For detailed recommendation, please write to

Ms Shilpa Sharma at shilpa.sharma@ficci.com

Feedback on the Revised CGHS Rates Framework (October 2025)

Ministry of Health & Family Welfare revised the CGHS Package Rates, effective October 13, 2025. This rationalised framework, covering nearly 2,000 procedures and introducing rate differentiation based on accreditation, city tier, and hospital type, marks a progressive step towards ensuring sustainability for providers and improved access to quality care for beneficiaries. FICCI submitted a few additional suggestions for the kind consideration of the Ministry in future reviews and operational refinements of the framework. These inputs focused on areas such as re-examining tier coefficients, addressing inflationary impacts, ensuring timely payments, and further strengthening the overall implementation process.

Another request was that all rate lists and notifications may clearly mention ""NABL"" alongside ""NABH"" wherever applicable, ensuring transparent recognition of both hospital and laboratory accreditation for fair reimbursement and operational clarity." These were submitted to the Director, CGHS, Ministry of Health & Family Welfare, Government of India.

For detailed recommendation, please write to

Ms Shilpa Sharma at shilpa.sharma@ficci.com

FICCI-EY Parthenon Report: True Accountable Care - Maximizing Healthcare Delivery Impact, Efficiently

This report, 'True Accountable Care: Maximizing Healthcare Delivery Impact, Efficiently', explores how India can deliver healthcare that is accessible, affordable, and accountable at scale. Despite providers advancing the quality agenda, systemic challenges persist — limited focus on long-term outcomes, weak incentivization for quality and digitization, low insurance penetration, and financial strain on providers — all restricting equitable care delivery.

Clinical excellence must translate into the best outcomes for the maximum number of people. This requires advancing quality at the micro level while continuously innovating to reduce care costs across the health continuum. Sustained affordability remains critical for ensuring quality care in India's large, publicly supported population.

A step change is needed — one that balances quality, access, and affordability; empowers patients with trusted information; embeds

agility, standardization, and innovation; moves toward outcome-based reimbursements; and ensures provider sustainability through aligned incentives.

The report proposes a 7C Framework as a roadmap toward a "True" Accountable Healthcare Ecosystem, featuring frameworks to balance cost and quality, tiered quality assessments, differentiated reimbursements, managed care pilots, and enhanced citizen empowerment. This was submitted to the Hon'ble Union Minister for Health & Family Welfare and Chemicals & Fertilizers; Hon'ble Member (Health), NITI Aayog and Secretary, Ministry of Health & Family Welfare, Government of India.

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

FICCI-Chase Advisors Paper: Unlocking the Longevity Dividend- Active and Healthy Ageing in India

India's population aged 60 and above is projected to exceed 300 million by 2050, making active and healthy ageing a national imperative. The report, 'Unlocking the Longevity Dividend: Active and Healthy Ageing in India,' seeks to position ageing as a transformative opportunity for the country. Drawing upon the global yet often under-discussed concept of Active and Healthy Ageing (AHA), it underscores the importance of enabling older persons to remain healthy, independent, socially connected, and economically engaged. The report advocates a whole-of-society approach integrating preventive and promotive health, geriatric care, mental well-being, lifelong learning, financial security, and age-friendly environments.

The report directly aligns with the Ministry of Health and Family Welfare (MoHFW)'s and Government of India's vision of creating an Empowered Elderly for Viksit Bharat @ 2047, where longevity is seen as a national asset. Developed under the aegis of FICCI with knowledge partners Chase Advisors and Inspiring Seniors Foundation, it reflects extensive consultations with experts across geriatrics, healthcare systems, private sector innovators, and funders. The objective is clear: to catalyze policy, partnerships, and investments that will make Active and Healthy Ageing a pillar of India's growth story. This was submitted to the Hon'ble Union Minister for Health & Family Welfare and Chemicals & Fertilizers; Hon'ble Member (Health), NITI Aayog and Secretary, Department of Social Justice and Empowerment, Government of India.

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

FICCI-KPMG Paper: AI in Healthcare- Reimagine Care with AI-driven transformation

AI in Healthcare"- Reimagine care with AI-driven transformation - With KPMG Healthcare systems face mounting pressure from rising patient demand, workforce shortages, and operational inefficiencies. Artificial Intelligence (AI) is emerging as a powerful enabler, enhancing—not replacing—human expertise across diagnostics, patient care, and operations. AI can reduce backlogs, automate administrative tasks, personalize treatments, and improve diagnostic accuracy. Yet, adoption often stalls at pilot stages due to fragmented implementation, unclear returns on investment, and trust or ethical concerns. True transformation requires embedding AI purposefully into core workflows and aligning it with healthcare value streams.

This Paper emphasizes how India is laying strong foundations for AI-driven healthcare through initiatives like IndiaAI, the Digital Personal Data Protection Act, and the Ayushman Bharat Digital Mission. NITI Aayog's National AI Strategy further prioritizes healthcare, focusing on early diagnosis, personalized care, and pandemic preparedness. AI is already enhancing patient engagement, remote monitoring, clinical documentation, and hospital efficiency, while linking care across hospitals, primary care, and adjacent sectors to build a resilient ecosystem.

The paper will further establish that to unlock its full potential, AI adoption must be strategic and ethical—driven by clear purpose, robust governance, stakeholder alignment, strong data infrastructure, and trusted partnerships. Organizations should progress through a phased journey: Enable (lay foundations and pilots), Embed (integrate into workflows), and Evolve (harness frontier technologies). The future of healthcare is intelligent, seamlessly combining AI with human capability to deliver smarter, connected, and patient-centric outcomes. This was submitted to the Hon'ble Union Minister for Health & Family Welfare and Chemicals & Fertilizers; Hon'ble Member (Health), NITI Aayog and Joint Secretary, NHA, Government of India.

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

FICCI Recommendations to Draft Civil Drone Bill, 2025

FICCI expressed its concerns with the draft bill as it intends to add to criminalisation, price-control risk, duplicated powers, and a compliance reset without delivering capabilities. FICCI recommended to ensure safety, security, and growth objectives by amending present Drone Rules, 2021 as introducing a new bill in current form would create unwanted loops, demotivate startups and entrepreneurs, and limit investments in the sector. This was submitted to the Under Secretary and SO, SDIT Div, Ministry of Civil Aviation.

For detailed recommendation, please write to
Mr Gaurav Gaur at gaurav.gaur@ficci.com

Inputs on Impact of Phasing out Mercury in Devices and products on Chemical Industry

Regarding implications of phasing out mercury-based devices from the chemical sector under Minamata Convention, the inputs were submitted to the Department of Chemicals and Petrochemicals.

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

Inputs on development of new chemical parks

Regarding the need for a preference framework for proposals concerning the establishment of chemical parks, the inputs were submitted to the Department of Chemicals and Petrochemicals.

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

Implementation/Extension of Polypropylene (PP) Materials for Moulding and Extrusion IS 10951:2020 Quality Control Order

To decide about either implementation or extension of the Polypropylene Quality Control Orders. The inputs were submitted to the Department of Chemicals and Petrochemicals.

For detailed recommendation, please write to

Mr Manoj Mehta at manoj.mehta@ficci.com

Request for Inputs on Chemical Park Proposal Preferences and Evaluation Criteria

Following the stakeholder consultation held at FICCI on the formation of new chemical parks in India, chaired by the Joint Secretary (Chemicals), inputs were sought from industry on finalizing the minimum size, essential utilities, and corresponding expenditure requirements for the proposed chemical parks. The inputs were submitted to the Department of Chemicals and Petrochemicals.

For detailed recommendation, please write to

Mr Manoj Mehta at manoj.mehta@ficci.com

Input on Environmental issues

Regarding the listing of hazardous wastes, it was proposed to prepare SOPs detailing the generating industry, utilizing industry, purpose of utilization, and final products derived from such wastes. Additionally, inputs were sought on global best practices for green belt requirements in industrial areas and on enabling flexibility in changing product mix without altering the overall pollution load. The inputs were submitted to the Department of Chemicals and Petrochemicals.

For detailed recommendation, please write to

Mr Manoj Mehta at manoj.mehta@ficci.com

Identification of Potential Products lines for Domestic Manufacturing

Inputs on products on which India rely heavily on imports but can be manufactured in India were submitted to the Department of Chemicals and Petrochemicals.

For detailed recommendation, please write to

Mr Manoj Mehta at manoj.mehta@ficci.com

Establishment of Indian Multi-Disciplinary Partnership (MDP) firms

Based on feedback received from members, FICCI submitted suggestions on MCA Consultation Paper on establishment of Multi-Disciplinary Partnership firms in India.

For detailed recommendation, please write to

Mr Santosh Parashar at santosh.parashar@ficci.com

IBC Amendment Bill, 2025

Based on industry inputs and suggestions, FICCI submitted a detailed representation on comments and suggestions related to IBC Amendment Bill, 2025. This was followed by a hearing before the Select Committee.

For detailed recommendation, please write to

Mr Santosh Parashar at santosh.parashar@ficci.com

Follow up submission on Listing and Post-Listing Compliance Requirements

Pursuant to discussions held during the interaction with Mr Sonparote, ED, SEBI, last month, FICCI submitted a detailed representation highlighting industry concerns and recommendations for easing compliance under SEBI Regulations on PIT, LODR, ICDR and others.

For detailed recommendation, please write to

Mr Santosh Parashar at santosh.parashar@ficci.com

Survey and Analysis of India's Imports to Belgium

India and Belgium share strong economic ties, with bilateral trade reaching approximately USD 12.9 billion in FY 2024-25, comprising exports worth USD 6.3 billion and imports valued at USD 6.5 billion.

Imports by Belgium accounted for less than 2% of India's total exports, valued at USD 441 billion in 2024, indicating significant potential for growth. Belgium's total imports from the world were valued at USD 519 billion in the same year, with the EU supplying about 62%. This suggests that while non-EU partners face strong competition in the Belgian market, there remains considerable scope for expansion. This was submitted to the Embassy of India, Brussels.

For detailed recommendation, please write to

Ms Gayatri G Prasad at gayatri.prasad@ficci.com

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For detailed recommendation, please write to

Ms Gayatri G Prasad at gayatri.prasad@ficci.com

FICCI request regarding the proposed Minimum Import Price (MIP) on Potassium Clavulanate and its Intermediate

FICCI had submitted a representation to the Secretary, Department of Pharmaceutical, Ministry of Chemicals and Fertilizers, prepared in consultation with the pricing committee members, to strengthen the domestic pharmaceutical sector in relation to the proposed Minimum Import Price (MIP) on Potassium Clavulanate and Penicillin G. This was submitted after due consultation from the pricing members. While FICCI supports implementing an MIP for one year subject to a market-based review, it highlighted major concerns regarding insufficient domestic capacity, as the proposal is based on a single manufacturer with a supply of 70 MT against a national demand of 922 MT.

Introducing an MIP under current conditions could restrict imports, create supply shortages, increase production costs, and risk overdependence on a single vendor—ultimately affecting medicine affordability, export competitiveness, and patient access. Given

Potassium Clavulanate's critical role as a beta-lactamase inhibitor and its sensitivity and stability requirements. FICCI has recommended through its suggestions and recommendations that MIP implementation be considered only after adequate domestic production capacity and a reliable, high-quality supply chain are established; until then, stable imports remain essential for public health security.

For detailed recommendation, please write to

Mr Ishan Pandita at ishan.pandita@ficci.com

Representation on Biological Diversity (Amendment) Act, 2023 and Related Regulations

FICCI, on behalf of the Ayush industry, has submitted a representation to the National Biodiversity Authority highlighting significant ambiguities and operational challenges arising from the Biological Diversity (Amendment) Act, 2023, the Biological Diversity Rules, 2024 and the ABS Regulations, 2025. The main concern relates to the interpretation of "codified traditional knowledge" under Section 7. While the amended Act exempts codified traditional knowledge, FICCI emphasizes that this exemption must also clearly cover products and drugs manufactured in accordance with codified knowledge as described in the authoritative texts listed in the First Schedule of the Drugs & Cosmetics Act. This reflects the legislative intent to exempt the Ayush industry, as evident from JPC recommendations and parliamentary debates.

FICCI further outlines several operational issues under the new regulations, including disproportionate benefit-sharing obligations, arbitrary classifications, impractical and vague reporting requirements, excessive compliance burdens, and procedural hurdles for IPR filings. These, it argues, contradict the Government's objective of ease of doing business and create unnecessary barriers for Ayush manufacturers.

The representation urges the NBA to issue clarifications, remove ambiguities, and revise provisions in consultation with industry to ensure fair implementation aligned with the legislature's intent and the practical realities of the sector. This was submitted to the Union Minister of State (Independent Charge), Ministry of Ayush, Government of India; Secretary, Ministry of Ayush, Government of India; Member Secretary, National Biodiversity Authority and Chairperson, Committee on Subordinate Legislation.

For detailed recommendation, please write to

Mr Ishan Pandita at ishan.pandita@ficci.com

Please share your valuable feedback at:

https://meet.ficci.in/voiceofficci/survey.asp

For more details, contact:

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