VOICE OF FICCI

SHAPING THE AGENDA

November 2025



From the Director General

In November 2025, FICCI had ministerial engagements across critical portfolios while suggesting 28 comprehensive policy recommendations spanning healthcare, intellectual property, and regulatory modernisation.

The FICCI leadership also had meetings with Union Cabinet Ministers, including Commerce and Industry Minister Piyush Goyal, Communications Minister Jyotiraditya Scindia, Food Processing Minister Chirag Paswan, Water Resources Minister Gajender Singh Shekhawat, and Civil Aviation Minister KRM Naidu.

International diplomacy encompassed Australian High Commissioner Philip Green, who served as Chief Guest at FICCI Turf 2025 alongside Indian High Commissioner to Australia Gopal Baglay. India's Ambassador to Italy, Vani Rao, engaged in an insightful discussion about the future of Indo-Italian economic relations. Additionally, FICCI leadership met Sara Wilshaw, Deputy Minister and Chief Trade Commissioner of Canada. India's Ambassador to China, Pradeep Kumar Rawat, attended a closed-door industry meeting led by Past President Harsh Pati Singhania.

Bureaucratic engagement proved extensive, encompassing Corporate Affairs Secretary Deepti Gaur Mukerjee, Agriculture Secretary Devesh Chaturvedi, Nivedita Shukla Verma (Secretary, Department of Chemicals & Petrochemicals), S Krishnan (Electronics and Information Secretary), VL Kantha Rao (Water Resources Secretary), Debashree Mukherjee (Secretary for Skill Development and Entrepreneurship), V Umashankar (Transport and Highways), and NITI Aayog Member Rajiv Gauba.

Policy advocacy involved twenty-eight initiatives addressing current regulatory issues. Key proposals focused on healthcare, including establishing a National Medical Value Travel Authority, creating a unified Brand India Healthcare, granting customs duty exemptions for additional lifesaving medicines, and raising import duties on dialysers from 7.5 to 20 per cent, thereby supporting Make in India efforts.

Medical devices advocacy addressed post-approval process simplification through MDTAG inputs, standardisation duplication avoidance, stickering timeline extensions to March 2026, refurbished devices policy frameworks, predicate IVD regulatory harmonisation with IMDRF practices, and medical device software guidance inputs.

Food safety submissions addressed the implications of the Rajasthan High Court GM foods judgment, malt-based foods standards amendments, ORS labelling clarification, NRVs-R establishment for young children, Food Product Identity Verification System enhancements, and crop grouping principles for pesticide residues.

Intellectual property advocacy addressed Trade Marks Act amendments, opposing shortened opposition periods from four to two months and pre-verification stages for oppositions. Major concerns highlighted the proposed "commercial scale" threshold in criminal enforcement, which would enable fragmented counterfeit networks to evade liability and undermine National IPR Policy commitments.

Chemicals sector submissions covered precursor chemicals scheduling under NDPS Act, chemical park evaluation criteria, import surge analysis addressing sulphuric acid price impacts, NITI Aayog regulatory reform consultations, and Budget 2026-27 proposals.

Financial services advocacy encompassed IBC Amendment Bill 2025 Select Committee submissions, RoDTEP rates data provision, and education sector inputs on UGC Multiple Entry-Multiple Exit guidelines. Tax policy recommendations addressed GST ITC restoration for hotels under ₹7,500 tariffs and rate reductions on culture media under HSN 3821. Defence sector submissions addressed trade embargo impacts on procurement timelines. Comprehensive Pre-Budget Memorandum 2026-27 consolidated sectoral recommendations.

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

Jyoti Vij

Recommendation for Creation of a Dedicated National Medical Value Travel Authority

FICCI recommends that NITI Aayog consider the creation of a National Medical Value Travel Authority under a designated nodal ministry, with multi-ministry representation and structured industry participation, to serve as the apex institution for India's medical value travel ecosystem. The proposed Authority would be responsible for comprehensive planning, inter-ministerial coordination, unified branding, policy harmonisation and global outreach, ensuring a coherent national strategy for this high-potential sector.

Its mandate would include developing and implementing a unified Brand India MVT identity aligned with NITI Aayog's strategic direction; coordinating policies across the Ministries of Commerce, Health, Tourism, MEA, and Civil Aviation; planning and executing India's representation at international health, tourism, and investment platforms; leading digital visibility initiatives such as a national patient information and facilitation portal; facilitating collaborations with airlines, hotels, state governments, and accredited facilitators to strengthen service integration; and building a national MVT data repository to support real-time insights and evidence-based policymaking. This was submitted to the Member (Health), NITI Aayog, Government of India.

For detailed recommendation, please write to

Mr Ishan Pandita at ishan.pandita@ficci.com

Request for Industry Recognition for the Medical Value Travel (MVT) Sector

1. Unified Brand Identity for Medical Value Travel – Brand India Healthcare

   India's Medical Value Travel (MVT) promotion efforts are currently fragmented across multiple ministries, hospital groups, state tourism boards, and private players. Each stakeholder undertakes its own promotional initiatives — often with different messages, visuals, and positioning — leading to inconsistent communication and dilution of India's overall brand identity in the global healthcare market.

   While India has an undeniable global advantage in healthcare — offering high-quality treatment, affordability, and holistic healing through both modern medicine and Ayush systems — this advantage is not being projected under a unified, coordinated global identity.

   Earlier, the Government of India had developed and launched the "Heal in India campaign, which successfully showcased India's strengths in medical and wellness travel at international forums.

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.

However, the campaign was later discontinued, leaving a vacuum in global outreach and recognition. Given the growing global competition in medical value travel — with countries like Thailand, Turkey, Singapore, and the UAE aggressively promoting their healthcare offerings — it is crucial that India resumes and institutionalizes a consistent Brand India campaign to maintain visibility and leadership in this sector."

2. Creation of a Dedicated Institutional Mechanism for Medical Value Travel (MVT)

The Medical Value Travel (MVT) sector in India functions across several ministries and departments, each playing a key role in its development and promotion including the Department of Commerce, Ministry of Health & Family Welfare (MoHFW), Ministry of Ayush, Ministry of Tourism, Ministry of Civil Aviation, and the Ministry of External Affairs (MEA).

While each ministry plays an important role in policy formulation, patient visa facilitation, accreditation, and international promotion, there is currently no single coordinating body or nodal institution that holistically oversees the sector. As a result, policies and initiatives are often developed in isolation, leading to overlaps, delays, and missed opportunities for synergy between the government and industry.

Given India's rising global prominence in healthcare and the increasing number of international patients choosing India for medical and wellness treatment, a dedicated institutional mechanism is urgently needed to streamline decision-making, promote Brand India Healthcare and facilitate policy alignment across ministries.

Recommendations:

- Establish a National Medical Value Travel Board or Authority under the Department of Commerce, comprising representatives from MoHFW, Ayush, MEA, MoT, Civil Aviation and industry stakeholders.
- Empower this Board to coordinate national policy, accreditation alignment, promotion strategy and facilitation of foreign patient inflow.
- Create an inter-ministerial coordination mechanism for regular review and policy harmonization among the ministries concerned with healthcare, tourism and external affairs.

These were submitted to the Joint Secretary, Department of Commerce, Ministry of Commerce & Industry, Government of India.

For detailed recommendation, please write to

Mr Ishan Pandita at ishan.pandita@ficci.com

FICCI Representation requesting inclusion of additional lifesaving drugs in List 3 of Notification No. 45/2025-Customs dated October 24, 2025

FICCI submitted a representation, prepared in consultation with the Pharma committee members for submission to MOHFW. The request was for granting customs duty exemption for lifesaving medicines under Notification No. 45/2025-Customs dated October 24, 2025. FICCI had submitted the list of critical imported lifesaving medicines received from Member companies that are currently not included under the existing customs duty exemption. These medicines address the needs of a growing patient population with limited therapeutic options, and extending the exemption would significantly improve both affordability and access.

The request was also submitted to Directorate General of Health Services (DGHS) and Ministry of revenue to recommend inclusion of these medicines in List 3 of the notification, and assure that the full benefit of exemption, if granted, will be passed on to patients.

For detailed recommendation, please write to

Mr Ishan Pandita at ishan.pandita@ficci.com

Submission of Data for Review of RoDTEP Rates

FICCI made a submission to the RoDTEP committee for the review of RoDTEP rates. The details shared by the members with respect to their manufacturing costs were compiled and shared by FICCI with the Ministry. This was submitted to the Under Secretary, Drawback division, Department of Revenue, Ministry of Finance.

For detailed recommendation, please write to

Ms Pragati Srivastava at pragati.srivastava@ficci.com

Draft Guidelines for Multiple Entry and Multiple Exit in Academic Programmes

FICCI recommendations of the Draft UGC Guidelines for Multiple Entry–Multiple Exit focused at strengthening clarity, operational readiness, and equitable implementation across HEIs. These inputs addressed ambiguities in credit validity, the need for broad-based equivalence committees, digital readiness standards, and frameworks for Cluster HEI coordination. They also highlighted inclusion of ODL learners, streamlined regulatory approvals, reduced administrative burden on institutions, and provisions for foreign students' APAAR integration to ensure a seamless and learner-centric ME–ME ecosystem. These were submitted to the Secretary, University Grants Commission.

For detailed recommendation, please write to

Dr Rajesh Pankaj at rajesh.pankaj@ficci.com

Request to Increase Import Duty on Dialyzers by 10-15% to Safeguard Domestic Manufacturing

FICCI requested an increase in the Basic Customs Duty (BCD) on dialyzers from 7.5% to over 20%, while retaining the 5% health cess, to shield domestic manufacturers from surging low-cost imports mainly from China, despite India's sufficient local production capacity. The submission highlighted unfair price distortion disrupting the market, threats to PLI beneficiaries' competitiveness, supply chain risks undermining Atmanirbhar Bharat, and adverse impacts on jobs, investments, and MedTech innovation. Supporting data on import trends and domestic capacity was provided to justify restoring a level playing field. This was submitted to the Director, MediTech Policy, Department of Pharmaceuticals, Government of India.

For detailed recommendation, please write to

Ms Shilpa Sharma at shilpa.sharma@ficci.com

FICCI Representation on Avoiding Duplication in Standardization of Medical Devices

FICCI submitted views opposing separate monographs for medical devices, already regulated under CDSCO's Medical Device Rules, 2017. It was cited as US/EU practices where non-primary drug components in combination products follow device standards aligned with ISO/IEC, not pharmacopeial mandates. FICCI advocated for addressing regulatory duplication, compliance burdens, and Ease of Doing Business setbacks, urging a single harmonized framework. These were submitted to the Secretary-cum-Scientific Director, Indian Pharmacopoeia Commission (IPC), Ministry of Health & Family Welfare, Government of India.

For detailed recommendation, please write to

Ms Shilpa Sharma at shilpa.sharma@ficci.com

Request for Extension of Timeline for Stickering/Re-labelling of Medical Devices due to GST Rate Revision

FICCI appreciated CDSCO's permission for Class C and D medical device importers and manufacturers to sticker revised MRPs post-GST rationalization, valid until December 10, 2025. It requested an extension to March 31, 2026, citing large supply chain inventories challenging timely relabelling and alignment with Legal Metrology Notification No. 10/14/2020-W&M dated September 18, 2025. This would ensure supply continuity and patient access without disruption. This was submitted to the Drugs Controller General of India, Central Drugs Standard Control Organisation (CDSCO), FDA Bhawan, Kotla Road, New Delhi.

For detailed recommendation, please write to

Ms Shilpa Sharma at shilpa.sharma@ficci.com

FICCI Inputs Post Meeting Held on 30 July 2025 – Refurbished Medical Devices Policy

FICCI re-emphasized the need for policy for import of refurbished medical devices policy and submitted inputs asked by the government, highlighting ongoing challenges for members and patients lacking a clear framework. This was submitted to the Additional DGHS, Directorate General of Health Services, Ministry of Health and Family Welfare, GoI, New Delhi.

For detailed recommendation, please write to

Ms Shilpa Sharma at shilpa.sharma@ficci.com

FICCI Representation on Regulatory Considerations for Predicate In vitro diagnostics (IVDs) devices

FICCI submitted representations on regulatory considerations for predicate in vitro diagnostic (IVD) devices, emphasizing harmonization with global practices in IMDRF countries like the US, EU, and Japan, where predicates are not universally required for approvals backed by robust clinical data. It highlighted challenges under MDR 2017 Rule 64 mandating local clinical evaluations for new IVDs despite approvals from reference regulators, including multiplex panels for syndromic testing like fever panels combining dengue, chikungunya, and malaria tests. FICCI proposed aligning Rule 64 with Rule 63, accepting 3-lot MDTL testing and PSURs for post-market surveillance to reduce duplication, enhance efficiency, and accelerate patient access per IMDRF/WHO-GRP principles. These were submitted to the Deputy Drugs Controller (India), IVD Division, Central Drugs Standard Control Organisation (CDSCO), Government of India.

For detailed recommendation, please write to

Ms Shilpa Sharma at shilpa.sharma@ficci.com

FICCI Inputs on Draft Guidance document on Medical device software dated 21.10.2025

FICCI collated and submitted inputs from the industry members regarding the Draft Guidance document on Medical device software dated 21.10.2025 with the purpose to provide guidance to Indian manufacturers and importers for the submission of application to the Licensing Authority for obtaining license/permission for manufacturing or import of Medical Device Software. These were submitted to the office of Drugs Controller General of India, CDSCO, New Delhi.

For detailed recommendation, please write to

Ms Shilpa Sharma at shilpa.sharma@ficci.com

FICCI-CIFTI Letter on Judgement by Hon'ble High Court of Rajasthan relating to Genetically Modified / Genetically Engineered Food in India

In the submitted representation to FSSAI, FICCI shared the challenges pertaining to the judgment by Hon'ble High Court of Rajasthan relating to Genetically Modified / Genetically Engineered Food in India to restrain the manufacture, sale, distribution and import of genetically modified food stuffs/ edible items in India.

While the original petition pertained specifically to the import of GM edible oils, the directions issued have a much broader regulatory impact across various segments of the food industry, even impacting non-GM foods. This includes food ingredients, processing aids, and genetically modified microorganisms (GMM)-derived enzymes, which are permitted for sale and import based on existing FSSAI directions. These ingredients and enzymes are currently in use by industry; however, the advent of this order has caused operational and trade challenges for FBOs.

Furthermore, the judgment's direction to restrict the import of any foodstuff/edible items/packaged food unless certified and labelled as "GM free" by the exporting country has introduced a serious trade constraint. This action is not warranted at all, keeping in mind the global regulatory practices as well as operational challenges.

These challenges, if unaddressed, could lead to shipment rejections, port demurrage, higher compliance costs, and potential withdrawal of food products from the Indian market, thereby affecting food availability and business continuity.

Hence, we submitted the following requests:

- Finalise GM Foods Regulation
- Interim Relief

For detailed recommendation, please write to

Mr Hemant Seth at hemant.seth@ficci.com

CIFTI revised proposal for amendment of Malt-Based Foods Standards 2.4.11 (2) of FSS (FPS&FA) Regulation, 2011

In the submitted representation to FSSAI, FICCI shared the revised proposal for the amendment in the Food Safety and Standards (Food Products Standards and Food Additives) Regulations, 2011, with particular reference to standard 2.4.11(2) related to "Malt-Based Foods".

For detailed recommendation, please write to

Mr Hemant Seth at hemant.seth@ficci.com

FICCI-CIFTI request for clarification on withdrawal of permissions for use of the term "ORS" along with brand names

The submitted representation to FSSAI, pertained to the FSSAI directives (F.No. RCD-15001/6/2021-Regulatory-FSSAI [E-1475] (FSSAI Order dated 14th Oct 2025 and FSSAI Clarification dated 15th Oct 2025) concerning the withdrawal of permissions for usage of the term 'ORS' along with brand names.

While we appreciated the intent behind this order, the directive was having unintended effects beyond the food sector. Specifically, at the ground level, this was also being extended to products containing the WHO-recommended ORS formula that are duly licensed under the CDSCO as per the Drugs & Cosmetics Act, 1940 and its applicable rules and regulations, and therefore do not fall under the purview of the FSS Act, 2006.

Food Business Operators manufacturing WHO-recommended formulation 'ORS' products under valid drug licences had been instructed to recall such products from the market. This action may have arisen from an interpretation that the directives apply broadly across ready to drink beverage category, whereas they were intended for products regulated solely under the FSS Act, 2006 and not those licensed under the D&C Rules.

In view of this, we requested that a clarification may be issued to clearly delineate the applicability of the said order.

For detailed recommendation, please write to

Mr Hemant Seth at hemant.seth@ficci.com

FICCI Inputs on second consultation paper for EWG on 'Establishing NRVs-R for Persons Aged 6 to 36 Months'

FICCI CODEX Cell submitted Inputs to NCCP, on second consultation paper for EWG on 'Establishing NRVs-R for Persons Aged 6 to 36 Months'.

For detailed recommendation, please write to

Mr Hemant Seth at hemant.seth@ficci.com

FICCI-CIFTI inputs on Demonstration session on the process flow of Food Product Identity Verification System (FPIVS) scheduled on 25th June, 2025

In the submitted representation to FSSAI, CIFTI shared a list of additional additives currently permitted for use in the respective product categories, which may not presently be reflected on the portal due to its alignment with the earlier regulatory framework.

For detailed recommendation, please write to

Mr Hemant Seth at hemant.seth@ficci.com

FICCI-CIFTI comments on Crop Groupings principles– 93rd Meeting of the Scientific Panel on Pesticide Residues

In the submitted representation to FSSAI, CIFTI-FICCI shared comments on Crop Grouping before the Scientific Panel on Pesticide Residues (SP-02), wherein the following challenges were highlighted:

1. Lack of clarity on principles for representative crop selection & grouping
2. Ambiguity in 'residue' definition
3. Dependence on WHO GEMS dietary data
4. Agro-climatic diversity and seasonality not adequately integrated into extrapolation framework
5. Impact on current and upcoming FSS (CTR) Regulations
6. Ambiguity in data-generation scheme criteria
7. MRLs applicability

In view of the above-mentioned challenges FICCI had recommended that the crop grouping be implemented in a stepwise manner:

1. Notify the comprehensive CTR regulation (which is yet to be final notified) before bringing the new principle of crop grouping.
2. Undertake a pilot program for selected groups e.g. spices. grains to test, fine tune, and set operational issues before extending and implementing it to wider crops.

For detailed recommendation, please write to

Mr Hemant Seth at hemant.seth@ficci.com

FICCI Recommendations on Proposed Amendments to the Trade Marks Act

These recommendations respond to DPIIT's proposed amendments to the Trade Marks Act, 1999, emphasizing that while India's trademark system is foundational to consumer trust, fair competition, and brand-driven economic growth, several of the proposed changes risk creating operational burdens and weakening enforcement mechanisms. They caution against reducing the opposition period from four to two months—given the large volume of weekly publications, the need for detailed manual review, and the disproportionate impact on SMEs—and instead propose a balanced, globally aligned three-month non-extendible window.

The recommendations also strongly oppose introducing a pre-verification stage for oppositions, warning that unclear "prima facie" thresholds and increased administrative processing may delay proceedings and result in dismissal of genuine challenges. A major concern highlighted is the proposal for a "commercial scale" threshold in criminal enforcement, which the recommendations argue would enable fragmented counterfeit networks to evade liability, undermine Section 115's purpose, erode consumer safety, and weaken India's commitments under its National IPR Policy. To ensure procedural consistency, they call for parity between national filings and Madrid

designations by permitting expedited examination, recognition of prior use, divisional applications, and issuance of local registration certificates.

The recommendations further caution against mandating Statements of Use within three years of registration, noting risks of automatic cancellation, evergreening, and administrative overload, and instead propose linking such declarations to renewal cycles. Finally, they recommend statutory strengthening of rights for declared well-known marks through amendments to sub-clause (d) to Section 135(2) and clarifying criminal falsification under Section 102 by limiting the same to only identical (counterfeit) marks and not extend it to deceptively similar marks (look-alikes).

For detailed recommendation, please write to

Ms Ruchita Singh at ruchita.singh@ficci.com

Impact of Trade Embargoes/ Restrictions/ Sanctions Affecting Indian Defence Industries

FICCI requested for relaxation in meeting order deadlines to the manufacturer / industry in the projects wherein disruptions occurred due to unavailability / shortage / interrupted supply of raw material under the policies governed by other countries.

For detailed recommendation, please write to

Mr Gaurav Gaur at gaurav.gaur@ficci.com

Inputs/Comments on the Import Surge on Chemicals

Regarding the Import Surge Report (April-September 2025-26) for following Chemicals: SULPHURIC ACID(28070010) and Other supporting catalysts with precious metals or metal compounds as active substances (38151290).

It was found that for Sulphuric Acid, the increase is only in total value, not in quantity. The change is mainly due to a sharp rise in Sulphuric Acid prices from ₹8.37/kg in April to ₹11.54/kg in September, representing an increase of about 38%. 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 NITI Aayog Working Group

Inputs in form of answers to questionnaires were submitted to NITI Aayog Working Group on Manufacturing & Construction, regarding the forthcoming consultation under the High-Level Committee on Non-Financial Regulatory Reforms. These were submitted to the Department of Chemicals and Petrochemicals.

For detailed recommendation, please write to

Mr Manoj Mehta at manoj.mehta@ficci.com

Inputs for Budget Proposals for the year 2026-27 in respect of Chemicals Sector

Regarding the Budget Proposals for the year 2026-27 in respect of Chemicals Sector were submitted to DCPC. This was submitted to the Department of Chemicals and Petrochemicals.

For detailed recommendation, please write to

Mr Manoj Mehta at manoj.mehta@ficci.com

Inclusion of Non-scheduled precursor chemicals under Schedule-A of Regulation of Controlled substance (RCS) Order of NDPS Act, 1985

Regarding the misuse of two precursor chemicals having dual use, namely 2 Bromo 4 Methyl propiophenone and Mono Methyl Amine, as controlled substances under Schedule-A of Regulation of Controlled substances (RCS) Order of NDPS Act, 1985. This was submitted to the Department of Chemicals and Petrochemicals.

For detailed recommendation, please write to

Mr Manoj Mehta at manoj.mehta@ficci.com

Submission regarding Chemical Park Proposal Preferences and Evaluation Criteria

Inputs were provided on what does the plug'n'play facility will mean for the chemicals sector in a chemicals park, what the facilities are needed and their corresponding cost in a model chemicals park of 8 sqkm. These were submitted to the Department of Chemicals and Petrochemicals.

For detailed recommendation, please write to

Mr Manoj Mehta at manoj.mehta@ficci.com

Recommendations of IBC Amendment Bill, 2025

Based on queries raised at the hearing before the Select Committee on Lok Sabha, a detailed representation on Insolvency and Bankruptcy Code (Amendment) Bill, 2025 was submitted to the select Committee on Lok Sabha chaired by Mr Baijayant Panda.

For detailed recommendation, please write to

Mr Santosh Parashar at santosh.parashar@ficci.com

Non-Availability of Input Tax Credit under 5% GST Regime for Hotels

Issue - Withdrawal of Input Tax Credit (ITC) under 5% GST Regime for Hotels.

Background - The reduction of GST rates to 5% for hotels charging ≤₹7,500 per night was widely welcomed by the market. However, the simultaneous withdrawal of Input Tax Credit (ITC) has created structural challenges for hotels operating in this segment. With ITC no longer available, GST paid on housekeeping, utilities, outsourced manpower, food & beverage supplies, and maintenance becomes a non-recoverable cost. This directly erodes already modest operating margins in a segment that serves the largest base of domestic travellers, SMEs, and value-conscious international guests.

The hospitality sector has been one of the fastest-growing contributors to employment, tourism receipts, and the “Brand India” narrative. Sustaining this growth requires a tax framework that is balanced and does not penalize hotel owners through blocked credit.

This withdrawal may also i) Substantially increase operating expenses and reduce profitability; ii) Lead some operators to pass on the burden to end-users, undermining the objective of affordable and competitive tourism; and iii) Impede the sector’s ability to maintain quality standards and expand capacity.

Recommendation - We, therefore, urge the government to revisit the unavailability of ITC for hotels in the mid-market and budget category. Restoring ITC, even under the 5% bracket (i.e., for room tariffs up to

₹7,500), will safeguard the financial health of thousands of hotels that form the backbone of India's tourism ecosystem. This was submitted to the Chairperson, Central Board of Indirect Taxes and Customs, Department of Revenue, Ministry of Finance, Government of India.

For detailed recommendation, please write to

Ms Ira Khanna at ira.khanna@ficci.com

Request for GST Rate Reduction on Products Classified under HSN 3821

Issue - The GST rate has been reduced on almost all the products used in the pharma and health sector, there is one critical category of product namely 'Prepared culture media for development or maintenance of micro-organisms (including viruses and the like) or of plant, human or animal cells' [classified under HSN 3821] that appears to be missed due to an oversight and continues to be leviable to GST @ 18% and impacting the overall cost of medical care to the general public.

Background - The Government of India has consistently emphasized the importance of affordable healthcare. Reducing the GST rate on these products will make these critical inputs more affordable and accessible and will also benefit the needy TB patients and further support government of India's TB Mukt Bharat 2027. India recorded 26 lakh cases of TB in 2024 highlighting the importance of TB as a public health problem and emphasizing the need to make diagnostics affordable and accessible.

The said products are mainly used for Pharma and Healthcare:- [1] In pathology labs, hospitals, and research institutions for disease diagnosis, vaccine development, and medical research; [2] Critical for research and development, quality control, and production of life-saving drugs and vaccines; [3] Few critical diseases managed by using the culture media are typhoid fever by testing the isolation of Salmonella species, tuberculosis by undertaking mycobacterial susceptibility testing. Several other essential goods, including similar nature of goods such as diagnostic reagents and other laboratories and medical devices, are leviable to GST @ 5%.

Recommendation - In view of the above, we request you to take the above into consideration and issue a notification for GST rate reduction from 18% to 5% for goods falling under HSN 3821. These were submitted to the Commissioner, GST Policy Wing, Central Board of Indirect Taxes and Customs, Ministry of Finance, New Delhi.

For detailed recommendation, please write to

Ms Ira Khanna at ira.khanna@ficci.com

Pre-budget Memorandum 2026-27

Based on the inputs received from the members, Pre-Budget Memorandum 2026-27 was sent to the Officials of the Ministry of Finance, Government of India, in November 2025.

For detailed recommendation, please write to

Ms Ira Khanna at ira.khanna@ficci.com

Please share your valuable feedback at:

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

For more details, contact:

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