VOICE OF FICCI

SHAPING THE AGENDA

December 2025



From the Director General

December 2025 witnessed sustained high-level engagement by FICCI with government, international partners, and industry stakeholders, whilst advancing thirty-five plus sector-focused policy submissions across trade, healthcare, energy, chemicals, and regulatory modernisation.

The month saw significant engagement with senior policymakers across critical portfolios. FICCI leadership met with Commerce and Industry Minister Piyush Goyal, Raksha Mantri Rajnath Singh, Environment, Forest and Climate Change Minister Bhupender Yadav, and Minister for Electronics and Information Technology, Railways and Information & Broadcasting Ashwani Vaishnaw. Engagements also encompassed Cabinet Secretary Dr T. V. Somanathan, Secretary of Economic Relations (MEA) Sudhakar Dalela, Additional Secretary (PMO) Ashish Vachhani, and Advisor to the Hon'ble Prime Minister Tarun Kapoor.

International diplomacy remained substantive. FICCI President participated in the India–Russia Business Forum and India–Russia Trade Forum, and played a key role in the Italy–India Business Forum held in the presence of the HCIM and the Deputy Prime Minister of Italy. The month concluded with FICCI business delegation accompanying the Hon'ble Prime Minister to Jordan, reinforcing industry engagement within India's strategic international partnerships.

Policy advocacy during December was extensive and sector-focused, addressing critical contemporary regulatory and economic issues.

In trade and international economic relations, submissions addressed the evaluation of India–US trade relations to the Rajya Sabha Secretariat, analysing tariff impacts on labour-intensive export sectors, India–EU FTA negotiations on chemicals and technical barriers to trade, and cooperation opportunities linked to the Hon'ble Prime Minister's visits to Jordan and Oman.

Healthcare and medical devices advocacy proved particularly extensive, addressing GST rationalisation for job work services and invoicing timelines for life-saving devices, mapping critical mineral requirements under the National Critical Minerals Mission, comprehensive recommendations from FICCI HEAL 2025, and wide-ranging NITI Aayog reforms targeting regulatory fragmentation and harmonisation across the Legal Metrology and CDSCO frameworks. Additional representations addressed PC-PNDT Act implementation challenges, international medical value travel facilitation, NABH accreditation frameworks, and inputs on HS 901890 covering domestic production capacity and refurbished medical devices policy.

Energy, coal, and mining submissions addressed restoring economic equilibrium under the Petroleum and Natural Gas Rules following GST increases, rationalisation of performance security requirements for coal blocks, enhancement of domestic coking coal availability, and reforms to coal auction and pricing mechanisms.

Chemicals and manufacturing advocacy encompassed anti-dumping investigation inputs, production capacity data for twelve critical chemicals, RoDTEP and RoSCTL rates revision, BIS certification concerns under the Furniture Quality Control Order, and a comprehensive white paper proposing a sui generis trade secrets regime aligned with Law Commission recommendations.

Food safety submissions addressed FSSAI advisory on milk vending machines, draft FSS (packaging) regulations, and inputs on Steviol Glycosides and tomato products standards. Financial services submissions encompassed a pre-budget memorandum to the Kerala state government, the transition to RBI's Expected Credit Loss framework, the harmonisation of State-level Deposit Refund Schemes, amendments to Legal Metrology on e-commerce, and household insecticides licensing requirements.

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

Background note on "Evaluation of India - US Trade Relations."

FICCI has submitted a detailed note on the Evaluation of India–US Trade Relations to the Rajya Sabha Secretariat. The United States remains India's largest export destination, accounting for around 20% of India's total exports in FY 2024–25. Changes in the US tariff stance during the first half of FY 2025 have had a significant impact on India's export performance, particularly in labour-intensive sectors such as apparel, gems and jewellery, marine products, tea, coffee, and spices. The note analyses the impact of the additional tariffs on these sectors and highlights the resulting pressures on competitiveness and market access. It also outlines key non-tariff barriers faced by Indian businesses in the US market, including regulatory and compliance-related challenges. The submission also includes recommendations for strengthening India's exports to the US market.

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

CIFTI representation pursuant to the National Stakeholder Consultation held on 13 November 2025

CIFTI submitted comments to FSSAI on the various agendas of the National Stakeholder Consultation held on 13 November 2025.

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

CIFTI-FICCI request for review of the Draft FSS (Packaging) Amendment Regulations, 2025, dated 13 October 2025

In its submission to FSSAI, CIFTI provided input on the Draft FSS (Packaging) Amendment Regulations, 2025, specifically on the clause relating to PFAs and BPA.

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

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

In the submitted representation to FSSAI, CIFTI shared the various queries raised by Scientific Panel members regarding the request to adopt a monograph on Steviol Glycosides (derived from extraction, fermentation, enzyme modification, and enzyme glucosylation).

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

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.

CIFTI-FICCI representation on FSSAI Advisory on the sale of milk and milk products through vending/kiosk machines and similar dispensing systems

CIFTI submitted its input on the FSSAI Advisory dated 19 November 2025, titled "Dairy Units engaged in sale of milk and milk products through vending/kiosk machines and similar dispensing systems to strengthen food safety compliance." The advisory directs dairy manufacturers selling milk and milk products through vending or kiosk machines to keep or make available FSSAI-approved or validated rapid test kits at the vending or kiosk location for the basic detection of common adulterants in milk and milk products.

In our submission, we proposed that the advisory and the associated food safety measures be appropriately limited to loose milk dispensed through milk booths and kiosks. Unlike packaged milk and milk products, loose milk is supplied to consumers without packaging protection and is therefore more susceptible to adulteration along the supply chain.

We also highlighted the concern about the lack of FSSAI-approved or validated rapid test kits for detecting adulterants in milk and milk products. In the absence of such approved kits, implementing the advisory may pose practical challenges for food business operators.

Accordingly, the following recommendations were submitted to FSSAI:

1. The applicability of the advisory may be restricted to loose milk dispensed through booth and kiosk systems, where the risk of adulteration is relatively higher; and
2. Packaged milk and milk products dispensed through vending machines may be excluded from the scope of the advisory.

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

Inclusion of a "No Added Sugar" category within the Tomato Ketchup and Tomato Sauce standard

CIFTI submitted its views to FSSAI on the inclusion of a "No Added Sugar" category under the Tomato Ketchup and Tomato Sauce standard

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

Request for support regarding the reduction of the GST Rate on Job Work Services (subcontracting) in relation to goods falling under HSN Code 90 (Medical Devices and Accessories thereof)

FICCI requested that, vide Notification No. 15/2025–Central Tax (Rate) dated 17.09.2025, the GST rate on job work services relating to pharmaceutical products under HSN Code 30 be reduced from 18% to 5%. In light of this, the medical devices industry respectfully submits that a similar GST treatment may be extended to job work services (subcontracting) for goods falling under HSN Code 90, which covers a broad range of medical devices and their accessories.

A reduction in GST on job work charges—from 18% to 5%—would lower the overall production costs for domestic manufacturers, strengthen the local manufacturing ecosystem, enhance competitiveness in export markets, and support innovation and greater value addition within India. This measure would directly improve the affordability of medical technologies and further align with India's vision of expanding access to high-quality healthcare. This was submitted to the Joint Secretary, DoP.

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

Request for support to extend the Time Limit for Issuance of Tax Invoice under Section 31(7) of the CGST Act, 2017, for Life-Saving Medical Devices under the 'Ease of Doing Business' initiative

FICCI highlighted an operational challenge faced by the medical devices industry in issuing tax invoices under Section 31(7) of the CGST Act, 2017, for products supplied on an approval basis. The provision triggers deemed supply and GST liability even when life-saving, high-precision devices remain unused, despite the final selection being clinically determined at the time of surgery. FICCI therefore requested a sector-specific relaxation or extension of the invoicing timeline, allowing tax invoices to be issued up to the date of actual supply or the expiry of the goods, to ease doing business and ensure uninterrupted availability of essential medical devices. This was submitted to the Joint Secretary, DoP.

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

Recommendations on Critical Mineral Requirements for the Medical Devices Sector under NCMM

FICCI recommended a structured mapping of critical minerals used across medical device segments to support the objectives of the National Critical Minerals Mission (NCMM). Industry inputs emphasise the need for assured supply chains, the promotion of domestic mining and processing, and incentives for local manufacturing of raw materials and components. FICCI also submitted the company-wise requirements for the minerals. This was submitted to the Joint Secretary, DoP.

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

FICCI Representation on Emerging State-Level Deposit Refund Schemes (DRS) and Need for National Harmonisation

FICCI recommended avoiding fragmented State-level Deposit Refund Schemes (DRS) that overlap with the existing national Extended Producer Responsibility (EPR) framework under the Plastic Waste Management Rules. Industry inputs emphasise the need for a harmonised, nationally standardised regulatory approach to ensure ease of doing business and supply chain continuity. FICCI further recommends that any DRS be voluntary and pilot-based, supported by structured stakeholder consultations, and accompanied by clear guidance on Legal Metrology and pricing implications. A unified national traceability standard is also essential to prevent State-specific requirements that could disrupt logistics, increase compliance burdens, and affect consumers. This was submitted to the Joint Secretary, MoEFCC.

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

Request for Support from the Ministry of Consumer Affairs for Extension of Timeline for Stickering/Re-labelling of Medical Devices due to GST Rate Revision

FICCI recommended harmonising regulatory timelines between the Legal Metrology framework and CDSCO to enable the smooth implementation of revised MRP requirements following GST rate rationalisation. Industry inputs highlighted operational challenges arising from large in-process and warehouse inventories, making compliance with divergent timelines difficult and potentially disruptive to supply chains. FICCI therefore recommended extending CDSCO's permission for MRP stickering and re-labelling for Class C and D medical devices until 31 March 2026, in line with the Legal Metrology notification. Coordinated action between the Ministry of Consumer Affairs and CDSCO would ensure regulatory consistency, reduce the compliance burden, and support the uninterrupted availability of essential medical devices while safeguarding consumer interests. This was submitted to the Director, Legal Metrology, Department of Consumer Affairs.

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

State-wise and District-wise Challenges on the Implementation of the PC-PNDT Act

Further to the meeting with the FICCI Medical Devices Committee members on 25 November, FICCI recommended streamlining the implementation of the PC-PNDT Act by aligning Central and State authorities to ensure uniform interpretation and enforcement. Industry inputs emphasise the need for clear, standardised procedures, reduced procedural ambiguity, and improved coordination at the district level to minimise unintended operational and business disruptions. FICCI further recommended structured joint deliberations with all stakeholders to identify practical reforms, strengthen compliance outcomes, and balance regulatory objectives with ease of doing business while safeguarding ethical practices and public interest. This was submitted to the Joint Secretary, MoHFW.

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

Inputs on HS Code 901890 w.r.t. domestic production capacity, challenges, and support required

FICCI submitted inputs on domestic manufacturing capacity and import dependence for medical devices under HS Code 901890 to the office of the Joint Secretary, DPIIT, highlighting constraints related to technology gaps, limited component ecosystems, high capital requirements, and regulatory compliance costs.

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

Recommendations of FICCI HEAL 2025

The key highlights, learnings, and recommendations from the sessions held during the annual healthcare conference, FICCI HEAL 2025, were submitted. These insights reflect the sector's defining choices and priorities as India approaches the next phase of its healthcare journey and are intended to support the creation of a patient-centric, affordable, accessible, and future-ready healthcare ecosystem aligned with the vision of a healthier and more developed India. These were submitted to the Hon'ble Union Minister for Health & Family Welfare and Chemicals & Fertilisers, Government of India; Hon'ble Member (Health), NITI Aayog, Government of India; Secretary, Ministry of Health & Family Welfare, Government of India; Secretary, Ministry of Social Justice & Empowerment, Government of India and Joint Secretary, NHA.

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

Suggested Reforms for Health Sector- Submission to NITI Aayog

FICCI has submitted comprehensive recommendations to address regulatory fragmentation, high compliance burden, and operational inefficiencies in India's healthcare and medical devices sectors. Key proposals include the establishment of unified digital single-window systems for licensing, approvals, and compliance, the introduction of deemed approvals and self-certification, and the harmonisation of requirements across states. FICCI has recommended rationalising healthcare infrastructure norms, including hospital building heights, fire safety, pollution control, and the removal of dual licensing for blood banks.

To support workforce mobility and digital health, FICCI has proposed a centralised national registry for medical practitioners and uniform acceptance of digital signatures on diagnostic reports aligned with the IT Act and ABDM. The submission calls for reforms in the Clinical Establishments Act to restore its focus on quality and safety; GST reforms, including ITC for hospitals; correction of inverted duty structures; and PCPNDT reforms to remove disproportionate criminalisation.

For medical devices, FICCI has recommended a dedicated regulator, streamlined approvals, rationalised QCOs, strengthened domestic testing infrastructure, procurement reforms recognising CDSCO approvals, and a clear national policy for refurbished medical devices to improve affordability and access. These were submitted to the Hon'ble Member, NITI Aayog, Government of India.

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

GST Increase on Capital Goods and Inputs – Restoration of Economic Equilibrium under Petroleum and Natural Gas Rules, 2025

FICCI recommends immediate measures to mitigate the adverse impact of the recent increase in GST on capital goods and inputs used for Petroleum (including Natural Gas) and Coal Bed Methane (CBM) operations. The upstream oil and gas sector already faces structural challenges due to the non-inclusion of natural gas under GST. The escalation of GST on capital goods from 0% under the VAT regime to 5%, then 12%, and now 18% has significantly increased project costs, affecting the viability of capital-intensive, long-gestation exploration and production (E&P) projects.

These increases disrupt the stable fiscal and contractual framework assured to operators and dampen investor confidence, particularly under the revenue-sharing regime where operators bear full cost escalations. Such developments undermine domestic production and run contrary to national objectives of energy security and Make in India.

FICCI draws attention to Clause 15 (Stabilisation) of the Petroleum and

Natural Gas Rules, 2025, which provides for restoration of economic equilibrium in the event of changes in law, including changes in taxes and levies. The recent GST increase constitutes a change in law and has materially altered project economics.

Accordingly, FICCI recommends that E&P operators be allowed to adjust the additional GST paid on capital goods and inputs against their dues payable to the Government. This will restore economic equilibrium, uphold fiscal stability, and encourage sustained investments in domestic oil and gas exploration and production. This was submitted to MoPNG.

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

Rationalisation of Performance Security for existing blocks & making Investments viable

FICCI recommends rationalisation of the Performance Security framework for commercial coal blocks to improve investment viability and ease of doing business. The current system—linked to peak-rated capacity, basket prices, royalties, and auction premiums, with annual revisions—has resulted in disproportionately high security amounts, leading to unproductive capital lock-in, recurring bank-guarantee costs, and financial strain in a capital-intensive sector.

Industry proposes a simplified, stage-based approach for operational mines that have achieved peak rated capacity. Removal of the Performance Security requirement is recommended, as development risks are substantially mitigated and adequate enforcement mechanisms are in place. For operational mines yet to achieve peak rated capacity, a reduced, slab-based Performance Security structure is suggested in place of the current complex formula. For project-stage mines, a capped and proportionate Performance Security framework is recommended.

These measures will free up working capital, incentivise faster production ramp-up, reduce compliance burden, and strengthen investor confidence, supporting domestic coal production and national energy security. This was submitted to the Ministry of Coal.

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

Enhancing Domestic Coking Coal Availability for Steel Manufacturers

FICCI recommends focused measures to enhance domestic availability of coking coal for steel manufacturers and reduce import dependence. Despite ongoing reforms, the auctioning of coking coal blocks has been limited, even though several explored and regionally explored coking coal blocks, particularly in the CCL command area, remain unallocated. FICCI Coal Taskforce recommends auctioning additional coking coal blocks to augment domestic supply and support India's growing steel demand.

Further, the industry highlights challenges in long-term coking coal linkage and washery monetisation schemes. The current requirement mandating in-house use or consortium tie-ups for by-products, coupled with low clean-coal yields, discourages participation. FICCI recommends relaxing by-product usage norms and allowing steel producers to sell by-products unrestrictedly, with assured coking coal yield.

Additionally, FICCI urges strict enforcement of grade conformity, as grade slippage in supplied coal increases consumption and production costs. These measures will strengthen domestic coking coal availability, improve steel sector competitiveness, and support national energy security. These were submitted to the Ministry of Coal.

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

Key Issues in Coal Sector Auctions and Operations

FICCI recommends targeted reforms to address key issues in coal sector auctions and operations, thereby improving investment viability, operational efficiency, and market transparency. To unlock high-grade domestic resources, FICCI Coal taskforce proposes strong incentives for underground coal mining, including premium rebates for underground extraction from existing blocks, waiver of Net Present Value charges on forest land above underground workings, and reduction or exemption of customs duty on imported underground mining equipment.

FICCI also recommends reviewing the National Coal Index (NCI) methodology to address pricing inaccuracies arising from basket-based pricing, grade cross-subsidisation, and divergence between auction-time and published prices. Premiums should be linked directly to representative monthly NCI prices to ensure fair and transparent pricing.

Further, FICCI suggests simplifying provisions for mine transfer, exit, and surrender to enable greater flexibility and participation. Ensuring data integrity and boundary consistency during auctions, particularly for CMSP blocks, is critical to avoid post-allocation disputes and delays. These reforms will enhance investor confidence, free up capital, and strengthen domestic coal production. These were submitted to the Ministry of Coal.

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

Strengthening International Flight Connectivity to Boost Medical Value Travel (MVT) to India

India has emerged as a leading global destination for affordable, high-quality healthcare. However, in several high-potential countries, the absence of direct or adequate flight connectivity remains a key constraint for patients seeking treatment in India. Strengthening international connectivity will significantly reduce travel time and cost, enhance patient safety, and improve India's competitiveness against other destinations. In this context,

FICCI has submitted the following recommendations to the Secretary, Ministry of Civil Aviation, Government of India: (i) introduce direct flights from high-potential countries currently lacking connectivity; (ii) increase flight frequency and expand routes beyond metro cities to Tier-2 MVT hubs such as Kochi, Ahmedabad, Jaipur, Lucknow, and Hyderabad; and (iii) establish Medical Travel Facilitation Support at key airports to ensure smooth patient handling. These measures will substantially increase patient inflows, support aviation growth, boost foreign-exchange earnings, and further reinforce India's position as a trusted global healthcare hub.

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

Recommendations for Developing Specialised Accreditation Frameworks for Hospitals and Medical Value Travel (MVT) Facilitators

FICCI has submitted the following recommendations for consideration by the Chief Executive Officer of the National Accreditation Board for Hospitals & Healthcare Providers (NABH) to further strengthen India's Medical Value Travel (MVT) ecosystem through focused, structured accreditation frameworks. These recommendations have been developed in consultation with leading hospitals, medical travel facilitators, and service providers engaged in international patient care.

FICCI has proposed that NABH may consider:

(i) Developing a specialised accreditation program for hospitals catering to international patients, with standards covering international patient experience, pre-travel support, language assistance, cultural sensitivity, and attendant facilities.

(ii) Strengthening and widely promoting the existing NABH accreditation framework for MVT facilitators, along with introducing an individual facilitator accreditation model to formalise freelance operations under defined quality norms.

(iii) These initiatives will help build a transparent, credible, and patient-centric ecosystem, further reinforcing India's position as a trusted global healthcare destination.

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

Recommendation on Streamlining of FRRO/Visa Guidelines for International Patients

FICCI submitted a key recommendation to improve regulatory clarity and ease of processes related to visa and FRRO guidelines for international patients seeking medical treatment in India. Currently, ambiguity persists regarding the treatment of international patients arriving on Tourist Visas, particularly in emergencies. While hospitals act in good faith and comply with FRRO reporting norms through Form C, inconsistent interpretation and enforcement at the local level have created operational challenges for healthcare providers.

In this regard, FICCI respectfully proposes: (i) permitting hospitals to treat international patients arriving on Tourist Visas, especially in emergencies; (ii) introducing a fast-track mechanism to convert Tourist Visas to Medical Visas or issue short-term online Medical Permits without disrupting treatment; and (iii) enabling public access to aggregated data on such cases to strengthen transparency and accuracy of patient inflow records. These measures will significantly enhance the international patient experience, reduce compliance complexities for hospitals, and reinforce India's standing as a patient-friendly and globally trusted healthcare destination. These were submitted to the Secretary, Ministry of Home Affairs, Government of India.

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

FICCI Representation on Implementation of Mandatory BE Studies for Class II & IV Drugs under G.S.R. 327€

FICCI submitted a detailed representation to the Central Drugs Standard Control Organisation (CDSCO), Ministry of Health & Family Welfare, prepared in consultation with members of the Pharma Committee. The submission addresses recent enforcement measures under G.S.R. 327(E) dated 3 April 2017, which mandate the submission of Bioequivalence (BE) study data for oral solid dosage forms under the Biopharmaceutical Classification System (BCS) Classes II and IV before the grant of manufacturing permissions. It outlines key operational, scientific, and economic challenges faced by the industry, particularly concerning phased implementation, which may prove cumbersome and inadvertently impact domestic manufacturing, market continuity, and the affordability of essential medicines. The representation also presents FICCI's recommendations and industry-driven suggestions to address these implementation-related concerns.

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

FICCI Representation on BIS Certification and Product Certification Framework for the Furniture Sector

The Furniture Quality Control Order, 2025, mandates BIS certification for a wide range of furniture products from 13 February 2026. The industry fully supports the objective of strengthening quality infrastructure, enhancing domestic capability, and aligning Indian standards with global benchmarks. This transition will have bearing on manufacturing practices, compliance systems, supply chains, and market readiness.

Industry stakeholders highlighted operational, financial, and procedural challenges that may impede smooth, timely implementation, underscoring the need for a balanced, facilitative regulatory approach.

A key concern relates to high compliance and testing costs under the current BIS grouping guidelines. Restrictive norms and the ±10% dimensional variation rule result in multiple test samples for products identical in design, structure, and function, disproportionately impacting high-end and low-volume manufacturers. Industry suggested rationalising grouping guidelines, allowing testing of a single representative sample per product category, reducing sample quantity requirements, and permitting progressive testing of variants during the licence validity period. A clear distinction between customised furniture and standardised, mass-produced products is also required to ensure consistent interpretation.

Domestic manufacturers sought optimised inspection scheduling for multiple applications under the same product line. Foreign manufacturers face procedural challenges relating to factory audits, testing timelines, and in-house infrastructure requirements, for which time-bound audits, streamlined processes, and rationalised testing requirements were recommended.

These measures will protect investments, sustain employment, improve competitiveness, and support Atmanirbhar Bharat. These concerns were submitted to the Joint Secretary, DPIIT.

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

Imposition of anti-dumping investigation concerning imports of "Phenol" originating in or exported from Singapore, South Africa, Thailand and the United States of America

DGTR had sought inputs on the imposition of an anti-dumping investigation concerning imports of "Phenol" originating in or exported

from Singapore, South Africa, Thailand, and the United States of America. These were submitted to the Department of Chemicals and Petrochemicals.

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

Request for Installed Capacity and Production Capacity data for 12 chemicals and petrochemicals – reg

Inputs were sought on Installed Capacity and Production Capacity data for listed 12 chemicals and petrochemicals and were submitted to the Department of Chemicals and Petrochemicals.

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

Visit of Hon'ble Prime Minister to Jordan and Oman

The Hon'ble Prime Minister was scheduled to visit Jordan and Oman. The Chemicals and Petrochemicals sector constitutes a significant area of engagement in these countries. In this context, suggestions for new initiatives or programs for cooperation between India and Oman/Jordan in the Chemicals and Petrochemicals sector were provided. These were submitted to the Department of Chemicals and Petrochemicals.

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

Request for data for review of Remission of Duties and Taxes on exported Products (RoDTEP) & Remission of State and Central taxes and levies (RoSCTL) rates-reg.

Inputs were provided in response to the exercise by the Department of Revenue, Ministry of Finance, Government of India, to rationalise/revise RoDTEP rates and RoSCTL rates. These were submitted to the Department of Chemicals and Petrochemicals.

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

Request for concurrence on concessions on certain Tariff Lines as asked by the EU under India-EU FTA Negotiations-reg.

Regarding the India-EU FTA, both sides were required to exchange the final offer on market access for goods. Specifically, regarding the Chemical sector, India has requested that the EU provide preferential market access for 1206 TLs, valued at USD 14.04 billion. The EU has consistently maintained that, given the size of its economy, its offer, and India's past precedents, it is essential for its stakeholders to secure at least concessions from India on its 43 TLs. As a trade-off between India's significant labour-intensive demands and other key export interests, and the EU's demands, India needs to indicate its position at the earliest. This was submitted to the Department of Chemicals and Petrochemicals.

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

India-EU FTA | TBT | Inputs Required from Ministries on Chapter Text and Product Annex

This is with reference to India EU FTA Technical Barriers to Trade (TBT) Chapter negotiations. The Department of Commerce sought specific details on QCOs' procedural aspects, including inspection requirements, renewal periods, and related EU regulations, as well as India's export interests with the EU. This was submitted to the Department of Chemicals and Petrochemicals.

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

Pre-Budget Memorandum on State Budget

The following Pre-Budget Memorandum on State Budget was submitted to the Hon'ble Finance Minister, Government of Kerala:

- Monetisation of excess land with the Government Companies.
- Creating more awareness among the public, industry, and Trade for Tax Compliance.
- Promoting Digital Transactions in the State Government of Kerala.
- Promoting automated parking systems in major cities through the PPP model.
- More Support for Green and Renewable Energy in the State.
- Categorise a review into the recruitment policy of manpower in non-essential categories.
- Suggestions to come up with a clear policy for the disposal of PSUs that have been loss-making for many years.
- Suggestions for increasing funding allocation for Startups in Kerala.
- Allotment of more land for KINFRA Industrial Parks.
- Allocation of more funds for participating in reputed International & National Exhibitions and trade fairs.
- Clear-cut of Conversion of Wetland/paddy land to Normal land for business purposes.
- Tax issues related to GST will be taken care of by the Central Government.

For detailed recommendations, please write to
Mr Savio Mathew at savio.mathew@ficci.com

Feedback on RBI's Draft Directions on move over to Expected Credit Loss Framework

The Reserve Bank of India issued draft Directions on the transition from the incurred-loss framework to the Expected Credit Loss (ECL) framework in October 2025. Pursuant to the draft Directions, FICCI sought feedback from its Banking Committee members. Based on inputs received from member banks and following further review, FICCI prepared a consolidated note that captures industry feedback and high-level suggestions. The note seeks to support the smooth and orderly implementation of the ECL framework while preserving prudential soundness and financial stability.

At a broad level, the feedback highlighted the need for adequate transition time, clarity on key implementation aspects, and proportionality in regulatory prescriptions, given the scale, complexity, and system-wide impact of the proposed framework. The suggestions are intended to help mitigate unintended volatility, operational challenges, and capital strain during the transition phase while remaining aligned with the ECL regime's underlying objectives. The note was submitted to the Reserve Bank of India (RBI).

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

FICCI Representation on the Draft Legal Metrology (Packaged Commodities) (Second) Amendment Rules, 2025, with respect to the proposed requirement for a searchable and sortable country of origin filter on e-commerce platforms

The submission outlines the industry's technical and operational concerns with the proposed Rule 6(10) requirement mandating a searchable and sortable Country of Origin filter on e-commerce platforms. It highlights challenges arising from multi-origin global supply chains, overlaps with existing COO disclosure requirements, and significant technological and usability constraints associated with implementing a sortable filter at scale. The note proposes that a searchable COO filter would sufficiently meet consumer transparency objectives while being operationally feasible. It requests that, if the requirement is retained, a minimum implementation period of twelve months be provided to enable compliant and stable execution. This was submitted to the Director, Legal Metrology Division, Department of Consumer Affairs, Ministry of Consumer Affairs, Food and Public Distribution, Government of India.

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

FICCI Representation on Emerging State-Level Deposit Refund Schemes (DRS) and Need for National Harmonisation

Under the Plastic Waste Management Rules and subsequent EPR guidelines of the MoEFCC, the industry has made significant investments in infrastructure for plastic waste compliance, collection mechanisms, and recycling partnerships. Producers, Importers, and Brand Owners (PIBOs) are registered with the Central Pollution Control Board (CPCB) and fulfil their EPR obligations through a centralised, geo-neutral system that ensures plastic waste collection and recycling targets are met across all States and Union Territories. This framework has brought much-needed uniformity, transparency, and efficiency to plastic waste management in India. But recently, several States have notified or are considering state-specific Deposit Refund Schemes or mandatory plastic packaging buy-back initiatives. This includes states like Himachal Pradesh, Goa, Punjab, Puducherry, Tamil Nadu, and Odisha. These schemes have started to mandate refundable deposits on packaging, state-specific labelling and traceability, and the creation of separate financial and operational mechanisms at the state level. These state frameworks present immediate and significant operational, legal, technical, and supply chain challenges. These were submitted to the Joint Secretary, Ministry of Environment, Forest and Climate Change (MoEFCC), Government of India.

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

FICCI Request for Exemption of Household Insecticides from the Requirement of License for Sales and/or Stocking or Exhibiting for Sale

Household insecticides such as aerosol sprays, mosquito coils, mats, and vaporiser refills are fundamentally different from agricultural insecticides in their formulation, scale, and intended use, as they are designed solely for domestic application, manufactured under approved standards, and packaged for safe consumer use. Applying licensing requirements meant for agricultural insecticides to these low-risk household products has created disproportionate compliance burdens for small retailers, distributors and e-commerce sellers, led to inconsistent interpretation across States, and posed practical challenges in modern multi-location supply chains. Regulatory practice under the Drugs and Cosmetics Act and the draft Pesticide Management Bill, 2020, supports a risk-based, differentiated approach to ordinary household-use products.

In this context, an explicit exemption or clarification exempting household insecticides from licensing requirements for sale and storage would enhance regulatory clarity, reduce administrative burden, support ease of doing business and ensure continued consumer access to essential household pest control products without compromising safety. This was submitted to the Secretary, Central Insecticides Board & Registration Committee (CIB&RC), Directorate of Plant Protection, Quarantine & Storage, Department of Agriculture & Farmers Welfare, Government of India.

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

White Paper on "A Proposal for Establishing a Sui Generis Trade Secrets Regime in India: A Policy and Industry-Aligned Roadmap."

Trade secrets play a crucial role in strengthening India's innovation ecosystem and safeguarding commercially sensitive information. Adequate protection of trade secrets encourages businesses to invest in new technologies, develop competitive strategies, and engage confidently in collaborations and technology transfer. Although India, as a member of the TRIPS Agreement, acknowledges the importance of protecting undisclosed information from unfair competition, it still lacks specific legislation on trade secrets, with protection resting largely on common law principles.

Over the years, several efforts have been made in this direction, including the National Innovation Bill (2008), the National IPR Policy (2016), and the Parliamentary Committee report (2021), all of which recognise the need for better protection of trade secrets. These attempts have helped start the conversation, but India has yet to have a dedicated law on this subject. With businesses relying more than ever on proprietary information, the need for a comprehensive, modern framework is urgent.

To address this, FICCI convened a Committee of Experts in June 2022 to analyse the issues, develop the broad contours of the need for trade secret legislation, and submit formal recommendations to the government.

The Law Commission of India, in its 289th Report (2024), has also recommended specialised legislation to safeguard trade secrets and prevent economic espionage, including provisions on whistleblower protection, compulsory licensing, and public-interest considerations.

This white paper reflects the same intent, offering a precise analysis of why India needs a dedicated trade secrets framework and outlining the

key elements that such legislation should include. It aims to support informed policy discussions and contribute to building a robust system that protects innovation, encourages investment, and strengthens India's competitiveness. This was submitted to the Secretary, DPIIT.

For detailed recommendations, please write to
Ms Ruchita Singh at ruchita.singh@ficci.com

Augment quarterly filings beyond listed entities

Ministry of Corporate Affairs is in the process of formulating rules for a class of unlisted companies to prepare and file periodic financial results, as per Section 129A inserted through the Companies Amendment Act, 2020 and has sought FICCI's views on the same. Based on inputs received from members, FICCI submitted industry views to MCA on the thresholds, periodicity of such filings, filing timelines, financial audit and so on.

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

SEBI Paper on Review of Simplification of Procedure and Standardisation of Formats of Documents for Issuance of Duplicate Securities Certificates

Based on suggestions from members on the SEBI Discussion Paper, industry views were submitted to SEBI on the proposed changes.

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

Functioning of Section 8 companies

Based on inputs received from members, FICCI submitted suggestions to the High-Level Committee on Companies Act (under the NITI Aayog High-Level Committee on Non-Financial Regulatory Reforms) for the simplification of rules applicable to Section 8 companies.

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

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

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