Policy Submissions Bulletin
Voice of FICCI

29 representations across Food • Taxation • Chemicals • Commerce • Defence • Infrastructure • Financial • Healthcare

Edition - April 2026

Director General's Message



Jyoti Vij
Director General
FICCI

April 2026 proved an extensive month for FICCI, with FICCI leadership advancing 29 comprehensive policy recommendations spanning food processing, food safety, chemicals and petrochemicals, trade and international relations, defence, infrastructure, financial services, and consumer affairs. Engagements remained substantive across all tiers — ministerial, diplomatic, and bureaucratic — reflecting FICCI's sustained commitment to translating industry concerns into actionable policy dialogue.

FICCI leadership met Minister of Health and Family Welfare JP Nadda and Minister of Commerce and Industry Piyush Goyal on Regulatory Data Protection. The leadership also met Ravneet Kaur, Chairperson, Competition Commission of India, Dr P K Mishra, Principal Secretary to the Prime Minister, and Shri Shaktikanta Das, Principal Secretary-2 to the Prime Minister, Hari Ranjan Rao, Secretary, Ministry of Youth Affairs and Sports, M. Nagaraju, Secretary, Department of Financial Services, and Tejveer Singh, Secretary, Department of Chemicals and Petrochemicals.

International engagement was extensive. FICCI leadership met ambassadors and high commissioners of Russia, Japan, Germany, France, Türkiye, Australia, Slovakia, and Italy, reinforcing bilateral economic relationships across key partner nations. A particularly significant luncheon meeting was held with Mr David O'Sullivan, EU Sanctions Envoy, European Commission, along with Ambassador Hervé Delphin, reflecting FICCI's engagement on critical geopolitical and trade dimensions affecting Indian industry. FICCI leadership also met Mr Dinesh K Patnaik, High Commissioner of India to Canada, and held a virtual interaction with Ambassador Mridul Kumar, Indian Ambassador to Switzerland.

Policy advocacy this month spanned eight sectors, with 29 representations advancing industry priorities across food safety, chemicals, trade, defence, financial services, and consumer affairs.

- **Food Safety & Processing** — 11 submissions to FSSAI covering packaging GST extensions, food import safety, labelling norms, and the inverted duty structure on food processing inputs
- **Chemicals & Trade Negotiations** — seven representations on India's CEPA negotiations with Peru, Canada, and Korea, alongside AITIGA and ATIGA review inputs
- **Commerce & Trade Remedies** — submissions on geopolitical trade disruptions, US Section 301 investigations on excess capacity, and Quality Control Orders
- **Defence & Financial Services** — sought a liquidated damages waiver for MSMEs under Emergency Procurement 2024; submitted inputs on MCA21 and the SEBI open market buy-back framework
- **Healthcare, FMCG & Infrastructure** — representations on cosmetics labelling, FMCG accessibility standards, West Asia supply chain disruptions, Telangana direct selling rules, and cost escalation relief for PMGSY contractors

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. FICCI remains steadfast in its resolve to work alongside government and industry in advancing the transformative vision of a Viksit Bharat by 2047.

Policy Submissions Catalogue — April 2026

This catalogue presents FICCI's policy submissions and industry representations made to Government ministries, regulatory bodies, and statutory authorities during April 2026. It covers a wide spectrum of sectors — from food safety and chemicals to trade, finance, defence, infrastructure, and consumer affairs — reflecting FICCI's commitment to shaping a competitive, transparent, and growth-oriented policy environment.

1 Food Safety and Standards — 10 Submissions

- **FICCI-CIFTI: Extension of Timeline for Unused Printed Packaging Material** *MoCA*

  FICCI highlighted critical challenges faced by industry in exhausting existing packaging material within the timeline prescribed under Order No. I-10/14/2020-W&M; dated 18 September 2025 — including significant lead times for printing revisions, supply chain disruptions, and disproportionate financial burden on SMEs. FICCI requested an extension of six months beyond 31 March 2026.

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- **CIFTI Inputs on Food Safety Issues in Importing Food Commodities** *FSSAI*

  With reference to the FSSAI meeting on food safety-related issues in importing food commodities dated 8 April 2026, CIFTI submitted comments to FSSAI on the stated agenda.

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- **Comments on Circular Letter: Food Labelling Provisions in Emergencies** *NCCP*

  FICCI CODEX Cell submitted to NCCP its comments on the circular letter related to guidelines on the application of food labelling provisions in emergencies.

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- **FICCI-CIFTI Representation on FSSAI Advisory: Discontinuation of '100%' Claims on Food Labels** *FSSAI*

  FICCI submitted that discontinuation of the '100%' claim had unintended implications for single-ingredient products such as chakki atta, pulses, millets, rice, single-seed oils, and whole spices. FICCI proposed an amendment under Clause 9 of the Food Safety and Standards (Advertising and Claims) Regulations, 2018, permitting '100%' claims for single-ingredient products subject to conditions of truthfulness and non-misleading representation.

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- **CIFTI Representation on Traceability of Coffee Arabica Samples Tested** *FSSAI*

  CIFTI submitted a representation on the traceability of samples of Coffee Arabica tested.

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- **FICCI Comments on Various Agendas Related to CCFL49** *NCCP*

  FICCI CODEX Cell submitted to NCCP comments on various agendas related to CCFL49.

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- **FICCI-CIFTI Representation on FSSAI Policy on HMO-Containing Infant Nutrition Products** *FSSAI*

  FICCI-CIFTI submitted a detailed representation regarding FSSAI's policy on Human Milk Oligosaccharide (HMO)-containing infant nutrition products.

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- **FICCI-CIFTI Request for Order/Advisory: Coffee–Chicory Mixture Front-of-Pack Declaration** *FSSAI*

  FICCI-CIFTI submitted a request for issuance of an order/advisory regarding the Coffee–Chicory Mixture Declaration on the front of pack.

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- **FICCI-CIFTI Request for Conditional Approval: Chemically Recycled PP/PE in Food-Contact Packaging** *FSSAI*

  A request was submitted for conditional approval/ allowance for the use of chemically recycled polypropylene (PP) and polyethylene (PE) in food-contact packaging material.

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- **Request for Inputs on Draft Category Descriptor for Cocoa-Based Spreads** *FSSAI*

  CIFTI submitted comments to FSSAI on the detailed product description for FC 2.4.1 (Cocoa-based spreads including fillings), which is not specified under the FSS (Food Products Standards and Food Additives) Regulations, 2011.

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2 Taxation and GST — 1 Submission

- **Concerns Related to GST for the Food Processing Sector** *TPRU*

  The recent GST rate rationalisation, which reduced tax on food items from 12 per cent/18 per cent to 5 per cent, has unintentionally led to an inverted duty structure in the food processing industry. Input services and capital goods continue to attract GST at 18 per cent, causing significant accumulation of unutilised input tax credit and working capital blockage.

  FICCI recommended:

  – Extend refund eligibility to ITC accumulated on input services and capital goods (amend Section 54(3)(ii) CGST Act read with Rule 89(5) CGST Rules).
  – Rationalise GST rates on key input services used in food processing to minimise credit accumulation.
  – Allow utilisation of available ITC for discharge of reverse charge liability.
  – Provide appropriate GST relief under RCM for eligible cross-border related-party transactions where full ITC is available.

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3 Chemicals, Petrochemicals and Trade Negotiations — 7 Submissions

- **India–Peru Trade Agreement: Preparation of India's Goods Market Access Offers** *Department of Chemicals and Petrochemicals*

  Inputs on 113 tariff lines were compiled for the ongoing goods market access preparation under the India–Peru Trade Agreement negotiations to ensure the offer exchange timeline could be met.

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- **AITIGA Review: Seeking Concession from ASEAN and Liberalisation of Tariff Lines** *Department of Chemicals and Petrochemicals*

  Inputs on India's ASEAN Free Trade Agreement market access proposal for further tariff liberalisation under the AITIGA Review were submitted, with suitable justification and rationale.

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- **India–Canada CEPA Negotiation: Mandate on Tariff Lines** *Department of Chemicals and Petrochemicals*

  The India–Canada Comprehensive Economic Partnership Agreement negotiations were launched on 2 March 2026 during the visit of H.E. Mr Mark Carney, Prime Minister of Canada, to India. Inputs were provided to support preparation of India's first Market Access Offer in Trade in Goods ahead of the second round of negotiations scheduled for May 2026.

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- **Request for Information on R&D Projects in Chemicals and Petrochemicals Sector** *Department of Chemicals and Petrochemicals*

  Information was solicited from industry on ongoing or recently completed R&D projects within the chemicals and petrochemicals sector covering projects at advanced stages of development nearing or achieving commercialisation, with outlay ranges from Rs. 50 lakh to Rs. 500 crore and above.

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- **Industry Inputs on Chemicals with Legitimate Uses (INCB Precursor List)** *Department of Chemicals and Petrochemicals*

  Inputs were requested on chemicals from the International Narcotics Control Board (INCB) precursor list that have legitimate industrial applications across pharmaceuticals, petrochemicals, and specialty chemicals. The inputs received were submitted to the Department of Chemicals and Petrochemicals.

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- **India–Korea CEPA Review: Product-Specific Rules (PSR) Inputs** *Department of Chemicals and Petrochemicals*

  Inputs were provided on revised PSR proposals from the Korean side covering 60 remaining tariff lines for consideration, following Korea's withdrawal of 136 tariff lines.

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- **Clarification on Domestic Manufacturers of 2-Ethyl Hexanoic Acid (HS Code 29159099) under ATIGA Review** *Department of Chemicals and Petrochemicals*

  Inputs were requested to facilitate an evidence-based assessment of proposed tariff treatment under the ATIGA review. ASEAN accounts for approximately 50 per cent of India's total imports of this product (approximately USD 110 million of total imports of USD 238 million).

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4 Commerce and Trade Policy — 3 Submissions

- **Balanced Approach to Trade Remedies and Quality Standards amid Geopolitical Disruptions** *Department of Commerce, Ministry of Commerce and Industry*

  FICCI submitted a representation emphasising the need to maintain continuity of trade remedial measures, expedite pending anti-dumping duty recommendations, and ensure that any recalibration of Quality Control Orders is guided by a structured, consultative process with industry stakeholders.

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- **Inputs on US Section 301 Investigation (7 April 2026)** *Department of Commerce, Ministry of Commerce and Industry*

  FICCI submitted inputs to the Government on investigations initiated by the United States under Section 301 of the US Trade Act of 1974, concerning both excess manufacturing capacity and child/forced labour in supply chains.

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- **Submission on USTR Portal: US Section 301 Investigations on Forced Labour and Excess Capacity (15 April 2026)** *Department of Commerce, Ministry of Commerce and Industry*

  FICCI made a submission on the USTR portal in relation to investigations under Section 301 of the US Trade Act of 1974 concerning assertions of excess capacity in manufacturing and forced labour in supply chains.

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5 Defence and MSMEs — 1 Submission

- **One-Time Waiver of Liquidated Damages for MSMEs under Emergency Procurement 2024** *Ministry of Defence*

  FICCI requested a one-time waiver of liquidated damages for MSMEs participating in Emergency Procurement 2024, to provide significant relief to indigenous manufacturers facing genuine delivery challenges arising from the first-time stabilisation of production lines.

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6 Infrastructure and Rural Connectivity — 1 Submission

- **Cost Escalation Compensation Mechanism for PMGSY Projects** *NRRDA*

  FICCI submitted recommendations for a structured, formula-based cost escalation mechanism for ongoing Pradhan Mantri Gram Sadak Yojana (PMGSY) contracts, similar to that adopted for National Highways. Key recommendations:

  – Introduce a formula-based cost escalation mechanism for ongoing PMGSY contracts.
  – Provide a one-time relief measure for contractors facing immediate financial stress.
  – Establish a targeted compensation framework for bituminous works given sensitivity to crude oil prices.
  – Implement measures on a time-bound basis to ensure project continuity and quality.

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7 Financial Services and Corporate Governance — 2 Submissions

- **Next Version of MCA21** *Ministry of Corporate Affairs*

  FICCI submitted inputs to assist in conceptualising and designing the next version of MCA21, addressing key challenges and gaps in the current system and recommending enhancements that would simplify compliance and improve ease of doing business.

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- **SEBI Consultation Paper: Re-Introduction of Open Market Buy-Back through Stock Exchange** *SEBI*

  Taking cognisance of FICCI's submission on the buy-back framework, SEBI issued a consultation paper on the re-introduction of open market buy-back of shares through the stock exchange. FICCI reiterated that open market buy-back via the stock exchange may be re-introduced.

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8 Healthcare, FMCG and Consumer Affairs — 4 Submissions

- **Veg/Non-Veg Symbols: Voluntary Application for Cosmetic Products (Cosmetics Rules, 2020)** *Ministry of Health and Family Welfare*

  This representation by FICCI FMCG seeks regulatory clarity on veg/non-veg (green/brown dot) symbols on cosmetic products. As cosmetics are intended only for external application, such classification has no bearing on their safety, quality, or efficacy. FICCI requested a formal notification clarifying that the veg/non-veg logo for cosmetics should remain voluntary, ensuring regulatory harmonisation and improving ease of doing business.

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- **FMCG Members' Feedback on Draft Accessibility Standards for the Products Sector** *Ministry of Social Justice and Empowerment*

  FICCI FMCG provided inputs on the draft 'Non-Negotiable Rules for Products for Persons with Disabilities,' recommending exemptions for certain categories, QR codes as alternatives to Braille embossing, phased implementation timelines, and standardised testing and certification systems, whilst urging a balanced approach that promotes accessibility without compromising cost-effectiveness.

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- **Supply Chain Disruptions Arising from the West Asia Disturbance** *Department of Consumer Affairs, Ministry of Consumer Affairs, Food and Public Distribution*

  FICCI FMCG highlighted challenges including acute shortages of LPG and industrial gases, rising freight costs, and shortages of polymers, cocoa, and fertilisers. Urgent

government intervention was sought through prioritisation of LPG/PNG allocation, reduction of import duties on key raw materials, and smoother logistics facilitation.

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- **FICCI Representation on Telangana Government Order (2 February 2026): Direct Selling Operations** *Food and Civil Supplies Department, Government of Telangana*

  FICCI sought review and alignment of the proposed monitoring mechanism for the direct selling sector with the national framework under the Consumer Protection (Direct Selling) Rules, 2021. Concerns were raised regarding requirements for police verification, cease-and-desist orders based on charge sheets, and expanded company liability for individual seller actions. FICCI requested rationalisation to ensure regulatory consistency.

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These 29 submissions collectively reflect FICCI's commitment to constructive, evidence-based policy dialogue with the Government of India. For sector specific inquiries, please contact the respective FICCI division leads referenced in each submission. To access full submission documents, write to tripti.kataria@ficci.com.

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