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The QCO imperative: Navigating opportunities and challenges in India

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1. Executive summary

In recent years, the Indian government has intensified the use of Quality Control Orders (QCOs) as a regulatory mechanism to improve product safety, consumer trust and manufacturing quality across sectors. Issued under Section 16 of the **Bureau of Indian Standards (BIS) Act, 2016,** QCOs mandate that certain products meet defined quality standards before they are sold in the global and domestic markets. As of March 2025, **187[1] QCOs, covering 769 products,** have been notified for compulsory BIS certification by various regulators/line ministries of the government of India. While BIS handles technical execution, certification and enforcement, it is DPIIT that oversees strategic regulation and policy formulation for a QCO. While initially centred around industrial goods and critical infrastructure components, QCO coverage is now being progressively extended to the consumer-facing segments, particularly the Fast-Moving Consumer Goods (FMCG) sector.

In 2024, the FMCG sector was valued at ~US$245 billion[2] and was the fourth-largest sector in India. It is projected to post a CAGR of ~17 percent during 2024–2033. The sector comprises various product categories within four sub-segments: beauty and personal care, home care, healthcare and food and beverages. Given its vast SKU range, high product turnover, seasonal launches and fragmented distribution network, the introduction of QCOs poses opportunities and implementation challenges. On the positive side, QCOs are expected to elevate product quality, enable harmonisation with global standards and enhance India's credibility in export markets. They are also aligned with the government's larger goals of **"Make in India," "Atmanirbhar Bharat" and "zero defect, zero effect"** manufacturing. However, challenges relating to QCO's implementation exist across various areas.

FMCG companies are grappling with ambiguities related to legacy stock, frequent re-certification due to packaging or formulation changes, regulatory overlaps, supply chain disruptions due to regulatory changes in raw material imports and infrastructure gaps (particularly testing). Furthermore, the lack of coordination and consistent interpretation of QCO mandates across supply chain stakeholders, including manufacturers, distributors, retailers and e-commerce platforms, has created confusion on issues such as sell-through of pre-QCO inventory. Given the large number of retail touchpoints in India (over 13 million kirana stores), such uncertainties can lead to supply disruptions, logistical strain and even potential product shortages for essential goods such as diapers, sanitary napkins, hygiene solutions and household cleaners.



[1] https://www.pib.gov.in/PressReleasePage.aspx?PRID=2110935
[2] https://www.imarcgroup.com/india-fmcg-market

Moreover, the following are some of the key challenges that industries are facing:

- Sanitary napkin manufacturers feel an unequal financial burden due to the **disparity in marking fees** of sanitary napkins and baby diapers. Even though both are made of similar materials and perform similar functions.
- Sanitary napkins have a shelf life of three years, but with the introduction of a QCO, products without a BIS marking cannot be sold after 30 June 2025. This leads to uncertainty around legacy stock. As a result, on one hand, product recall will lead to a significant economic loss for stakeholders, on the other hand, destroying the entire stock will create a sustainability/environment issue and economic loss for companies.
- Shavers/Trimmers are International Electrotechnical Commission (IEC) certified. All countries accept the IEC except India. Thus, a QCO will change the manufacturing process of these products and create a **regulatory overlap** with some existing global standards.
- Manufacturers completely dependent on importing raw materials such as Lauric acid from Indonesia must obtain BIS FMCS certification to import. However, procuring the FMCS licence only takes 8–12 months and is complex. Thus, it leads to delays in the supply chain and **increased costs.**
- A QCO will lead to modifications in existing product formulations, such as detergents, cleaners and disinfectants. This will lead to **increased R&D, packaging redesigns and other costs.**
- QCOs in industries where mandatory robust BIS standards are already in place, for example the cosmetics sector, will lead to regulatory overlap and result in operational inefficiencies.

However, to strengthen the existing QCO ecosystem and enhance its coverage, this report has recommendations across multiple areas such as manufacturing, testing, import, marking fee, legacy stocks and QCO implementation. Some of the key suggestions include:

1. A **universal packaging approach** for multi-site manufacturing by listing manufacturing locations and BIS licence numbers on a simplified label to ensure traceability without added complexity.
2. Design strict **guidelines and SoPs for external testing labs** at the product and SKU level to ensure quality.
3. Increase investment in **expanding the infrastructure of BIS-recognised laboratories** and enhancing inspection capacity, especially for niche product categories.
4. **Allow the sale and distribution of legacy stock** for its full shelf life under QCOs, particularly for essential hygiene products, can help avoid market shortages and reduce environmental waste.
5. Mandate the industry players to **submit a self-declaration** on whether they are meeting the quality requirements.

In conclusion, companies across industries increasingly acknowledge that QCOs serve the broader interests of the sector. While QCOs represent a pivotal move towards enhancing product quality and strengthening India's manufacturing credibility, their success in the FMCG sector hinges on regulatory agility, alignment among stakeholders and a measured approach towards implementation. With a supportive ecosystem in place, QCOs have the potential to drive consumer protection, streamline supply chains and enhance global market readiness.

2. Introduction and context

Overview of the QCO framework in India

QCOs are mandatory legal instruments issued by the Government of India under Section 16 of the **Bureau of Indian Standards (BIS) Act, 2016.** QCO ensures certain products meet defined quality standards before they are sold in any market. These orders are primarily implemented to protect consumers' interests, ensure product safety and quality, curb the circulation of sub-standard or unsafe goods and standardise industrial production for better international competitiveness. India's QCO framework has witnessed significant developments in 2025, reflecting a strategic push towards enhancing product quality, ensuring consumer safety and aligning with international standards. So far, **government regulators/line ministries have notified 187[3] QCOs covering 769 products for compulsory BIS certification.**

QCOs derive their authority from the following laws and departments:

Bureau of Indian Standards (BIS) Act, 2016: To enforce QCOs and provide certification.

Department for Promotion of Industry and Internal Trade (DPIIT): Nodal ministry for issuing QCOs across multiple sectors.

Essential Commodities Act, 1955: Applicable in some cases to regulate quality standards for essential goods.

Legal Metrology Act, 2009: Often used alongside QCOs for packaging and labelling compliance.

WTO Agreement on Technical Barriers to Trade (TBT): As a WTO member, India notifies its QCOs to ensure transparency in cross-border trade regulations.



[3] https://www.pib.gov.in/PressReleasePage.aspx?PRID=2110935

Role of BIS and DPIIT

The **BIS Act, 2016** empowers the central government to make the use of **BIS** Standard Mark compulsory on notified goods, articles, processes and systems. Where BIS ensures **technical execution, certification and enforcement,** **DPIIT** steers **strategic regulation and policy formulation.** Both institutions have **distinct but interconnected roles** in drafting, implementing and enforcing QCOs that ensure product quality and safety in the Indian market.

Interactions of BIS and DPIIT in the QCO ecosystem

Function	DPIIT	BIS	Interaction
Product selection	Identifies critical products for QCOs	Provides feasibility and standard availability	DPIIT aligns with BIS for technical viability
Drafting of QCO	Coordinates inter-ministerial input and policy goals	Drafts technical content and compliance structure	Joint preparation and stakeholder consultation
Notification to WTO	Sends draft QCOs to WTO	Supports with technical documentation	DPIIT leads; BIS supports
Implementation	Sets the enforcement date and scope	Certifies manufacturers and enforces compliance	DPIIT governs; BIS executes
Monitoring and review	Evaluates the industrial and trade impact	Reports enforcement and industry feedback	Feedback loop to improve the QCO process

Note: *While the standards issued by the BIS for any product or process are for voluntary compliance, those notified by the central government through the issuance of Technical Regulations (TR), primarily through Quality Control Order (QCO) under Scheme-I and Compulsory Registration Order (CRO) under Scheme-II, are mandatory.*

QCO implementation

As mentioned under the BIS Act, 2016, below are the key steps involved in the implementation of a QCO, from product identification to policy initiation and enforcement:

	Steps of implementing a QCO	
1	**Product identification**	Ministries/Departments (e.g., DPIIT, FSSAI, MoHFW) identify products where quality control is needed.
2	**Draft notification**	BIS formulates technical specifications based on Indian Standards (IS), implementation timelines, compliance, enforcement provisions, etc.
3	**Stakeholders alignment**	The government consults with manufacturers, importers, industry bodies and other stakeholders for feedback.
4	**WTO notification**	Draft QCO is notified to the WTO under the TBT agreement.
5	**Final notification**	QCO is notified in the Gazette of India with an effective date and other details.
6	**Implement**	Manufacturers and importers must: • Obtain a **BIS licence** or registration. • Get products tested in **BIS-approved labs.** • Affix the **Standard Mark** before selling.
7	**Monitoring and enforcement**	BIS conducts factory audits, product testing, market surveillance, etc. Non-compliance results in seizure, fines, criminal prosecution, etc.

Source: DPIIT and BIS

Stakeholder responsibilities

The process of identification, implementation and enforcement of a QCO involves multiple stakeholders. The table below is an indicative breakdown of the responsibilities assigned to every stakeholder:

	Stakeholders' responsibilities
Ministry/Regulatory Authority (e.g., DPIIT, FSSAI, MoHFW, MoC&I)	**Draft, notify and monitor QCOs** • Identify new products requiring QCOs. • Facilitate inter ministerial policy alignment. • Notify draft QCOs to WTO TBT and publish final gazette notifications. • Set implementation timelines and monitor enforcement in coordination with BIS.
BIS (Regulator)	**Standardisation, certification and enforcement** • Draft and periodically update Indian Standards. • Process applications and conduct type tests and factory audits. • Perform market surveillance and enforcement actions.
State legal metrology	**Inspection and monitoring** • Inspect packaging, labelling and net content compliance. • Coordinate with BIS for joint market checks.
Manufacturer	**Product compliance, testing, labelling** • Apply for and maintain ISI/CoC licences for each plant. • Ensure each production batch meets the notified standard. • Affix Standard Mark correctly. • Keep quality manuals, test reports and audit records up to date.
Importers/Traders	**Ensure certified imports and maintain traceability** • Ensure imported goods are BIS certified and carry the ISI mark. • Maintain records and documentation for customs/BIS checks. • Coordinate with overseas suppliers for QCO awareness and certification.
Testing laboratories	**Conduct tests for BIS certification** • Conduct impartial, standardised testing per the relevant IS. • Participate in proficiency testing programmes to maintain accreditation.
Industry associations	**Training, awareness, consultation** • Provide consolidated feedback during stakeholder consultations. • Support capacity building and awareness drives among MSMEs.
Consumers and NGOs	**Prefer ISI-certified products, report violations** • Report sub standard products through BIS portals. • Participate in public consultations to refine technical specifications.

Rationale behind QCO implementation

The Indian government has introduced QCOs to ensure that products sold or imported in India meet mandatory safety, quality and performance standards. The table below indicates various policy areas where QCOs are affected and the rationale for their introduction.

Policy domain	QCO driver	Key outcomes
Consumer safety	Mandatory quality checks	Safer products in the market
Product quality	Enforcement of Indian Standards	Higher performance and durability
Fair trade	Elimination of substandard goods	Ethical competition
Imports	Barrier against low-quality imports	Domestic industry protection
Exports	Global standards alignment	Boost in export potential
Industry modernisation	Quality-led manufacturing	Upgraded infrastructure
Environment	Standards on pollution and safety	Sustainable practices

Source: PIB, BIS, DPIIT

Current QCO landscape

As of March 2025, **187 QCOs[4] encompassing 769 products,** have been notified by various regulators/line ministries of the government of India. Additionally, below are the two horizontal (a cross-sectoral QCO that applies broadly across multiple industries or product categories, not limited to one specific sector) QCOs[5] that were introduced:



Safety of Household, Commercial and Similar Electrical Appliances (Quality Control) Order, 2024: Issued by DPIIT, Ministry of Commerce and Industry, the order primarily covers electrical appliances intended for household, commercial or similar applications.



Machinery and Electrical Equipment Safety (Omnibus Technical Regulation) Order, 2024: Issued by the Ministry of Heavy Industries, the order covers 20 categories of machinery and electrical equipment and their sub-assemblies/ components.

Furthermore, to expand the scope and coverage of mandatory quality standards across different sectors, the Indian government is considering the inclusion of a few new QCOs. For example:



The **"Furniture (Quality Control) Order, 2025,"[6]** effective 14 February 2026, mandates BIS certification for items such as chairs, tables and storage units.



Implementation of **QCOs for chemicals[7]** such as Beta Picoline, Pyridine and Sodium Tripolyphosphate have been scheduled for 13 March 2026.

[4] https://www.pib.gov.in/PressReleasePage.aspx?PRID=2110935
[5] https://www.pib.gov.in/PressReleasePage.aspx?PRID=2110935
[6] https://worldtradescanner.com/DPIIT%20Order%20No.%20S.O.%20801(E)%20dated%2013%20February,%202025.htm
[7] Primary Discussions



As of March 2025, India harmonised ~93 percent of its applicable standards with international ISO/IEC norms, thus aligning its quality ecosystem with International Standards and best practices.

- Currently, in India, **22,689[8] Indian Standards (IS)** are in force; these are the specifications and norms developed by the Bureau of Indian Standards (BIS) for products, processes or systems.
- Of these, **10,300[7] IS have corresponding international standards,** i.e. there is an equivalent or similar standard available from ISO (International Organisation for Standardisation) or IEC (International Electrotechnical Commission).
- Of these 10,300 comparable standards, **9,616[7] ISs have already been harmonised,** i.e., India has aligned 93.3 percent of its standards with the relevant ISO/IEC norms.

Key measures by the government to support stakeholders

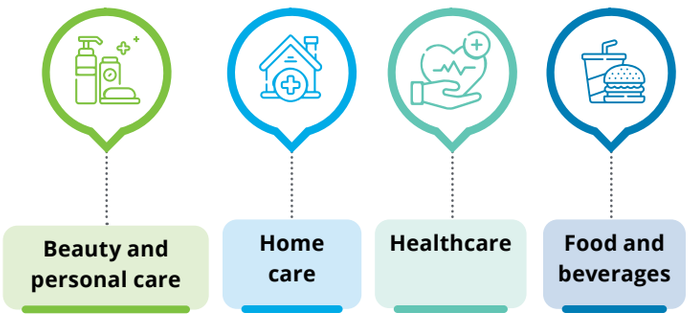
- **Flexibility in implementation timelines:** Recognising the challenges faced by the industry, in some cases, the government has accepted the industry demands by increasing the QCO enforcement timelines. For example:
  - **Fatty acids:** QCOs for various fatty acids,[9] including lauric acid and palm fatty acids, have been uniformly deferred to 24 October 2025.
  - **Electrical appliances:** The Safety of Household, Commercial and Similar Electrical Appliances (Quality Control) Order, 2025[10] has been deferred to 19 March 2026.
  - **Medical textiles:** QCO amended to allow sale of declared legacy stock (without the Standards Mark), manufactured or imported before the enforcement date, until 31 December 2025 - provided such stock is declared in advance.
- **Support for Micro and Small Enterprises (MSEs):** To balance the quality enforcement with economic considerations, specific relaxations have been provided to small enterprises:
  - **Exemptions:** Micro-enterprises with investments up to INR25 lakh and turnovers under INR2 crore are exempted[11] from certain QCOs, such as those pertaining to cookware and utensils.
  - **Transition periods:** MSE manufacturers have been granted a six-month relaxation period to clear existing stock, facilitating smoother transitions to new standards.

Overall, QCOs are driving greater standardisation, improving product credibility and reinforcing India's ambition to build a robust, self-reliant, globally competitive manufacturing ecosystem. QCOs serve as regulatory instruments and enablers for export growth and improved manufacturing standards. Though QCOs across sectors mark a significant shift towards a quality-driven regulatory environment in India, some challenges remain, particularly for sectors such as FMCG and MSMEs.

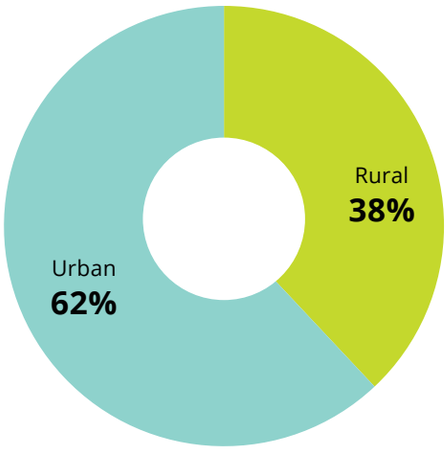
[8] https://www.pib.gov.in/PressReleasePage.aspx?PRID=2110935#:~:text=Out%20of%2022689%20total%20Indian,the%20existing%20ISO%2FIEC%20standards.
[9] Primary Discussion
[10] Times of India- Media Article
[11] https://www.livemint.com/news/india/dpiit-extends-timeline-for-cookware-and-utensils-qco-eases-rules-to-help-businesses-11729001537950.html

3. FMCG QCO overview

FMCG is the **fourth-largest**[12] sector in India, **contributing ~3 percent** to the GDP and providing jobs to nearly 3 million people. The sector was valued at **~US$158 billion**[13] in 2024 driven by rising disposable incomes, rural penetration, e-commerce expansion and rapid shift towards quick commerce. The Indian FMCG sector is broadly segmented into four main categories:



Rural vs urban demand (by value), 2025

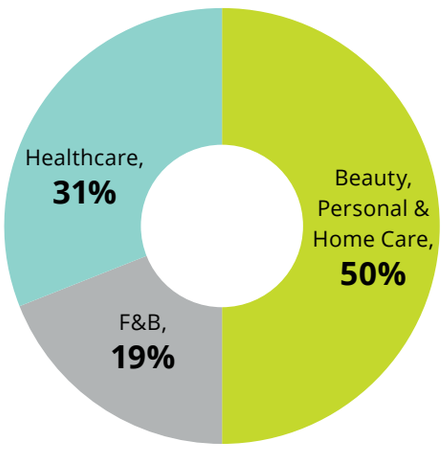


Source: NielsenIQ

Together, beauty, personal and home care account for ~50 percent[14] share of the FMCG market, followed by healthcare and F&B, which account for 31 percent and 19 percent, respectively.

Driven by evolving consumer preferences, technological advancements and a strong emphasis on health and wellness, sustainability and personalised customer experiences, these segments have witnessed significant shifts. However, with this rapidly evolving market, product quality, safety, fair competition and standard practices demand higher focus. Reflecting on the government's intent and increased emphasis on product safety, quality assurance and import regulations, **QCOs are gaining prominence** in the FMCG landscape. While many FMCG categories are not yet under QCO, parts of several high-impact categories such as personal care, home care and healthcare have been directly or indirectly brought under its scope recently or are under consideration.

FMCG market segmentation



[12] https://www.ibef.org/industry/fmcg-presentation
[13] NielsenIQ and "SPURring growth in FMCG, retail and e-commerce sectors in India"
[14] https://www.ibef.org/industry/fmcg-presentation



QCOs across the FMCG segment

Beauty and personal care: The existing QCOs indirectly impact the beauty and personal care market. Cosmetic products are already strictly regulated by CDSCO (Central Drugs Standard Control Organisation) under the Drugs & Cosmetics Act 1940 and Cosmetic Rules 2020, ensuring product safety and quality. While existing QCOs currently affect certain raw materials and ingredients (e.g., orthophosphoric acid, hydrogen peroxide and lauric acid) and packaging components (e.g., Polyethene, HDPE, LDPE, and caustic soda) used in cosmetic manufacturing, finished cosmetic products themselves are not directly covered by QCOs. The industry maintains that these finished products are comprehensively regulated through existing mechanisms and that additional QCOs would increase regulatory burden and stifle innovation. Similarly, for packaging products, extrusion and moulding QCOs are issued for Polyethene, High-Density Polyethene (HDPE), Low-Density Polyethene (LDPE), Caustic Soda, etc. However, presently, skin beauty care appliances are directly covered under QCO, along with some of the cosmetic applicators, which are under consideration to be covered under a QCO. In personal care, oral hygiene appliances, electrical shavers, clippers, trimmers and similar appliances are some of the finished goods directly covered under QCO.[15]

Home care: Products such as household disinfectant fluids in the home care segment are regulated under the Drugs and Cosmetics Act, 1940 and are mandatory under IS 1061:2017 issued by the Ministry of Chemicals and Fertilisers (Department of Chemicals and Petrochemicals), but are not covered under QCO. However, the surface-cleaning appliances for household use employing liquids or steam, dishwashing machines, air purifiers, etc., are under consideration to be covered under a QCO.[16]

Healthcare: Medical devices are already governed by the Medical Devices Rules, 2017, with BIS certification for specific categories. BIS has issued IS (Indian Standard) for items such as disinfectants, sanitisers, antiseptic solutions, hygiene chemicals and select medical-grade products (such as surgical gloves). Furthermore, some of these products are under consideration to be covered under QCO.

Food and beverages: The FMCG food and beverage segment is primarily regulated by FSSAI. Some items, such as packaged drinking water, edible oils and food-grade packaging materials, are covered under the IS certification, not QCO. This ensures product safety, hygiene and compliance with Indian quality standards before sale or distribution. Moreover, electrical food equipment such as[17] electric food processors, low-speed food grinding machines and food waste disposers are covered under a QCO.

[15] https://www.bis.gov.in/upcoming-qcos-notified-and-due-for-implementation/
[16] https://www.bis.gov.in/upcoming-qcos-notified-and-due-for-implementation/
[17] https://www.bis.gov.in/upcoming-qcos-notified-and-due-for-implementation/

4. Challenges across FMCG segments

High SKU volume and product diversity

FMCG companies in beauty, personal care, homecare, food, beverages, etc., have thousands of SKUs across flavours, pack sizes, formats and products. Thus, ensuring each product complies with respective QCO standards or a BIS certification is complex, resource-intensive and time-consuming. For example, detergents are sold as powder, liquid, bar, top load, front load, etc. Thus, each format and variant may require separate BIS testing and certification.

Import and export challenges

With QCOs, the import of raw materials or machinery suffers through disruptions in business operations, impacting domestic sales and exports. The raw materials the manufacturer imports must be listed on the BIS website, and the supplier must be qualified to import. In addition, from the day a QCO is enforced, obtaining licences and clearance certification for every consignment (and often relabelling imported goods under BIS rules) is mandatory, which further adds more time to supply. For example, suppose a manufacturer entirely depends on an imported product, such as lauric acid (imported from Indonesia). In that case, they must obtain BIS FMCS certification to ship lauric acid to India. However, procuring the FMCS licence takes around 8–12 months and is complex. Thus, inbound and outbound logistics require new certifications and documentation, risking delays unless infrastructure is improved or the process is simplified.

Testing and other Infrastructure gaps

Currently, testing methods and their capabilities in external facilities are not standardised. For example, a testing method applied to food cannot be used on cosmetics. Furthermore, limited availability of accredited testing (for example, testing for volatile organic impurities and nitrosamine impurities) labs, their ease of access and affordability for smaller firms (working as third-party vendors for larger companies) is another challenge. Additionally, a few smaller companies must ship samples to different locations (e.g., Pune to Bhopal) due to the unavailability of local accredited labs and in-house facilities. This leads to delays in certification and potential bottlenecks in production planning. Moreover, the availability of labs conducting tests prescribed under BIS is another concern. With the rapid pace of technological advancements, the methodologies prescribed under BIS require re-evaluation and updation.

Supply chain challenges

As indicated below, each FMCG segment has multi-tiered supply chains involving raw material importers, suppliers, third-party manufacturers, contract packers and vendors. Thus, companies face difficulty ensuring uniform QCO compliance across stakeholders.




Beauty and personal care
Raw ingredient suppliers. (Imported/Domestic)
Manufacturing (in-house/contract)
Packaging, labelling and QC
Labelling and QC
Warehousing
Distributors/ Retail Chains/E-com/Direct-to-Consumer (D2C)
*Beauty and personal care products also need prior approvals/licensing from State officials (FDA).
Home care
Chemical suppliers (Imported/Domestic)
Formulation units
Packaging
C&F agents
Distributors/B2B/Kirana
Consumer
*Home care products falling under disinfectant category require prior approvals/ licensing from state or CDSCO.
Healthcare (OTC, nutraceuticals, wellness)
Raw ingredient suppliers (Imported/Domestic)
Formulation and packaging
BIS/FSSAI/CDSCO approvals
C&F agents
Pharmacies/E-pharma/ D2C/Retail chains
Food & Beverage (F&B)
Farmers/Suppliers
Ingredient processing units
Manufacturing and blending
Packaging
C&F agents/Warehouses
Distributors/Modern trade/E-commerce
Retailers/HoReCa/ Consumers

Furthermore, delays in supplier certifications from BIS, delays in imports, unavailability of raw materials, frequent changes in packaging, etc., pose serious challenges to the existing supply chain, thus leading to inventory shortages, increased production costs and reduced access to essential inputs, especially for sectors such as food processing, healthcare, cosmetics and electronics.



Implementation challenges

Most companies agree that QCOs are in the larger interest of the industry. However, they often face challenges with the implementation of QCOs. Lack of clarity and proper guidance adversely affects the segments across FMCG. For example, manufacturers, distributors and retailers in the sanitary and diaper market deal with legacy stocks. With the introduction of QCO, these companies (have ~95 percent of their stock in circulation) lack clarity on whether these products can be sold till the date of expiry (i.e., a shelf life of three years) or need to be recalled, as only a fresh batch can be sold from the date of QCO enforcement.

Currently, FMCG has about 13 million[18] kirana store network across India where these FMCG products are distributed. Moreover, any stock recall will lead to:

- A logistical nightmare
- Market scarcity since these products are often for basic hygiene
- Major economic loss for all the stakeholders in the supply chain
- Adverse effect on the brand equity

To fulfil QCO compliance, manufacturers have initiated fresh production from 1 January 2025 or before. However, wholesalers, distributors and retailers with no extra time to exhaust their legacy stock are either not willing to accept fresh stock or are returning stocks to their respective manufacturers. E-commerce players, too, are limiting their fresh stock from the manufacturers. Lastly, destroying the legacy stock would create a sustainability/environmental issue.



Compliance burden and other cost implications

QCO certification requires auditing of the manufacturing process, periodic product testing, quality assurance plans, labelling and other compliance measures. Currently, BIS issues certification to a manufacturing location, not the entire brand. If a company has five locations (own or third party), each will have a unique approval number, and all of them must appear on each product pack. Existing compliance requirements lead to additional investments and reduce margins for FMCG companies, especially in price-sensitive segments. Additionally, as regulators intend to drive QCO compliance top down, the focus is on large, mostly compliant companies to set the trend, and small and medium companies are expected to follow the same.



Regulatory overlaps

Many FMCG segments are already regulated under different existing rules and laws. For example, packaged foods and nutraceuticals fall under FSSAI rules, drugs and medical devices under the Drugs Act and CDSCO, packaging material labelling under Legal Metrology, etc. Similarly, sectors such as cosmetics have existing regulations and requirements under the Drugs & Cosmetics Act and the Cosmetic Rules in India. Thus, introducing QCOs across these segments will create regulatory overlaps and complex compliance (firms must satisfy existing and QCO norms) requirements, leading to a rise in trade challenges.



Other challenges

- **Innovation bottlenecks due to recertification needs**

  Rapid product innovations, seasonal and festive launches and packaging modifications are common across FMCG segments. Each change may require recertification or revalidation under QCOs, thus causing delays and additional costs.

- **Labelling and packaging adjustments**

  QCO requirements necessitate frequent and sudden label or packaging redesigns, which can become time-consuming and expensive, especially for products already printed in bulk.

[18] https://economictimes.indiatimes.com/industry/cons-products/fmcg/fmcg-companies-roll-out-the-red-carpet-for-kiranas-amid-quick-commerce-boom/articleshow/122010436.cms?from=mdr

5. Sub-sector analysis

A. Beauty and personal care

Overview

The beauty and personal care market in India was valued at **US$28 billion** in 2024[19] and is estimated to reach **US$48.3 billion** by 2033, at a CAGR of 5.6 percent during 2025–2033. The segment includes skin care, hair care, oral care, fragrances and cosmetics. The sector's growth is fuelled by increasing disposable incomes, rising grooming consciousness and digital penetration. D2C and legacy brands use e-commerce and influencer marketing to tap into India's young, aspirational consumers, especially in tier 2–3 cities.

The Ministry of Health & Family Welfare (MoHFW) regulates the sector, which enforces the Drugs & Cosmetics Act, 1940 and the Cosmetic Rules, 2020. The Cosmetics Act covers various aspects such as manufacturing, licensing, Good Manufacturing Practices (GMP), Good Laboratory Practices (GLP), labelling, imports and penalties for non-compliance. Additionally, the Cosmetic sector is covered under the **Indian Standards (IS)** developed by **BIS and CDSCO (Central Drugs Standard Control Organisation).** Where IS ensures the development of product standards, CDSCO helps regulate ingredients, formulations and the safety of cosmetic products. Furthermore, cosmetic products are also subject to multiple overarching legislations, such as:

Legal Metrology Act, 2009: For labelling and weights and measures compliance

Consumer Protection Act, 2019: To address marketing claims and fair-trade practices

Plastic Waste Management Rules, 2016: To promote sustainable packaging and responsible disposal

Current QCO landscape in personal care and beauty

Currently, the introduction of QCO has an influence only in certain areas of personal care. Products such as Direct Current (DC) supplied/battery-operated toothbrushes are covered under QCO[20] and are to be enforced by March 2026. Similarly, QCO in DC supplied/ battery-operated shavers, trimmers, clippers and similar appliances will be enforced by 2026. In the cosmetics industry, QCOs are currently in a feasibility stage. Increasing demand and rapid innovation of certain categories of cosmetics, particularly makeup and skin care, have driven the need to assess the feasibility of a QCO by DPIIT. However, the existing cosmetics sector is already tightly regulated, and despite the absence of a QCO, the sector is subject to stringent BIS standards. Some of these standards and parameters covered category-wise are as follows:

- For safety, there are safety evaluation standards
- Micro test standards, which are compulsory for all cosmetic products
- Certain heavy metal standards for all cosmetic products
- Rancidity (peroxide number) breaking load value, softening point, etc.
- PH, MICRO, heavy metals or thermal stability.
- Moisture and volatile matter fineness, menthol and camphor limits in skin powder

[19] https://www.imarcgroup.com/india-beauty-personal-care-market
[20] https://www.bis.gov.in/upcoming-qcos-notified-and-due-for-implementation/

Below is the indicative list of QCO status for some of the products in the segment:

Product category	QCO status	Details
Toothbrushes	Under consideration	BIS standard IS 6356[21] is in place.
Oral hygiene appliances	Under consideration	Currently under IS 302 (Part 1):2024 IEC 60335-1:2020.[22]
Toilet soaps	Not under QCO	IS 2888 defines the BIS standard and is regulated under the Cosmetic Rules 2020.
Sanitary napkins	Under QCO[23]	BIS standards IS 5405 and IS 13427; QCO in October 2024.
Shaving products (razors)	Under consideration	Early-stage work is underway to standardise and assess QCO.
Cosmetic packaging	QCO applies indirectly	Plastic containers are regulated under food-grade and packaging QCOs.
Cosmetic applicators	Under consideration[24]	Cosmetic applicators (e.g., brushes, sponges, puffers, etc.) are being considered for QCO or BIS certification.
Hair dyes, skincare products	Not under QCO	CDSCO/FDA regulated; BIS standards exist; regulated under cosmetics rules.
Lipsticks, creams, makeup	Not under QCO yet	Cosmetic rules apply under the Drugs and Cosmetics Act; BIS standards exist and are regulated under Cosmetic Rules 2020, which may step in selectively.

The number of QCOs affecting the cosmetics sector is dynamic. This list is estimated to increase as currently, fewer ingredients and chemicals are covered under QCOs.

Presently, the issued QCOs impact: Orthophosphoric acid, Hydrogen peroxide and Lauric acid.[25]

QCOs are issued for polyethene, HDP, LDP and caustic soda for packaging, extrusion and moulding.

Segment-specific challenges[26]

Disparity in marking fees[27]

Despite sanitary napkins and baby diapers being made of similar materials and performing similar functions (absorption), there is a disparity in the marking fees:

- Where the marking fee for diapers is INR 0.001 per piece, it is INR 0.01 per piece for sanitary napkins.
- The current fee structure places an unequal financial burden on sanitary napkin manufacturers.

Legacy stock

Sanitary napkins have a shelf life of three years and are primarily distributed through mom-and-pop shops. With the introduction of QCO, a product without a BIS marking cannot be sold post 30 June 2025:

- Manufacturers started fresh production on or before 1 January 2025 but have ~95 percent of their stock in circulation. Furthermore, on one hand, a product recall will lead to a significant economic loss for stakeholders, and on the other hand, destroying the entire stock will create a sustainability/environmental issue.
- Wholesalers, distributors and retailers with no extra time to exhaust their legacy stock are either returning legacy stocks to their respective manufacturers or are not taking pre-QCO stock because of its missing BIS mark (which has a higher risk of BIS authorities seizing it).

[21] https://www.services.bis.gov.in/php/BIS_2.0/bisconnect/standard_review/Standard_review/Isdetails?ID=MTMyMTc%3D
[22] https://www.bis.gov.in/upcoming-qcos-notified-and-due-for-implementation/
[23] https://www.pib.gov.in/PressReleaseIframePage.aspx?PRID=2058537
[24] Primary Discussions
[25] Primary Discussions
[26] Primary Discussions
[27] Primary Discussions

Direct and indirect impact on cosmetic manufacturers

Proposed QCO for titanium dioxide, salicylic acid and make-up and beauty products directly and indirectly affects the cosmetic manufacturers:

- Directly: If cosmetic companies import from overseas suppliers, these suppliers should have a BIS certification.
- Indirectly: If cosmetic companies are buying ingredients or outsourcing part of their manufacturing to a third-party local vendor or supplier, then compliance with BIS certification is mandatory.

Regulatory overlap

- Products such as shavers/trimmers are IEC certified, the highest quality standard globally. All countries accept IEC, except India. Furthermore, introducing QCO will lead to a change in the manufacturing process of these products and overlap with some existing global standards.

Other challenges

- With QCO, importing materials that are not available in India is a challenge. For example, titanium dioxide used by MSME is capital-intensive and cannot be manufactured locally. However, a QCO will impact its prices in the market and its availability in India.
- Applicators (used to apply cosmetics) such as brushes and others, which earlier were non-regulated commodity products, are now under consideration to be covered under QCO.

B. Home care

Overview

The FMCG homecare sector comprises detergents, cleaners, disinfectants and home hygiene tools. The segment is driven by rising hygiene awareness, urbanisation and premium product penetration. Multinational and domestic brands have introduced products catering to rural affordability and urban preferences. Furthermore, the consumer demand has remained resilient post-COVID-19, with a notable shift toward eco-friendly and multipurpose products. Thus, for consumer safety and quality assurance, QCOs will ensure correct formulation and labelling of the products. Additionally, QCO will ensure the formalisation of the overall homecare market by regulating the large, unorganised segment that produces substandard products. Products such as disinfectants are already regulated under the Drugs & Cosmetics Act and require approval from authorities (BIS and others). Similarly, some key raw materials are already under mandatory QCO, such as linear alkylbenzene and caustic soda.

The segment is regulated under different central and state ministries and departments, such as:

Ministry of chemicals and fertilisers: It regulates raw materials used in cleaners (e.g., surfactants, solvents), chemical safety standards and import/export norms.

Central Pollution Control Board (CPCB): This board, part of the Ministry of Environment, Forest and Climate Change (MoEFCC), regulates the environmental impact of chemical-based home care products.

Department for Promotion of Industry and Internal Trade (DPIIT): It issues QCOs for packaging materials such as plastic containers, paperboard and cans, which are often used for home care products.

Bureau of Indian Standards (BIS): It ensures implementation of Indian Standards (IS codes) and QCOs for items such as synthetic detergents (powder and bar), Phenolic disinfectants, Liquid surface cleaners, etc.



Current QCO landscape in home care

Most finished home care products are covered under BIS standards, but not under existing QCOs. However, some of the ingredients used are either imported or locally produced, and manufacturing of these products is covered under the QCO mandate. Additionally, surface cleaning appliances for household use, such as dishwashing machines and air purifiers, are under consideration to be enforced under a QCO by 2026 under IS 302 (Part 1): 2024 IEC 60335-1:2020.[28]

Product category	QCO status	Notes
Detergent powders and cakes	Under consideration	BIS standard IS 4955[29] available; QCO under consideration.
Disinfectants and floor cleaners	No QCO	IS standards such as IS 1061[30] and IS 1065 are in place.
Phenyl (white and black)	Under consideration	Commonly used as disinfectants, BIS 1061 is mandatory for black and white fluids, per the Drugs & Cosmetics Act & rules, Schedule O Part I.
Toilet cleaners	No QCO	Toilet cleaners claiming to be disinfectants are already regulated under the Drugs & Cosmetics Act.
Scrub pads/brushes	No QCO	Basic product quality standards are being finalised
Household insecticides	Partially regulated	Regulated under the Insecticides Act; BIS is working on complementary QCOs.
Plastic buckets, mugs, etc.	Under consideration	Covered under plasticware QCOs for food/non-food use (IS 15298, etc.).

[28] https://www.bis.gov.in/upcoming-qcos-notified-and-due-for-implementation/
[29] https://www.services.bis.gov.in/tmp/tbl5_2024-11-08_1192.pdf
[30] https://www.bis.gov.in/wp-content/uploads/2024/03/Revised-PM-template-1061-V2.pdf

Segment-specific challenge[31]

Increase in costs

- Introduction of QCO will lead to modifications in existing formulations of detergents, cleaners and disinfectants.
- Reformulation can increase R&D and packaging redesign costs and potential performance trade-offs.

Import challenges

- Imports of raw materials for home care products (Example- Anionic surfactants, Sodium Lauryl Ether Sulphate (SLES) used in detergents, dishwashing liquids, etc.) without BIS certification might face port rejections, impacting supply chains.

Compliance burden on MSMEs

- Many small and medium manufacturers lack the infrastructure, technical expertise and resources to adapt to the QCO requirements.
- High cost of product testing, site audits and documentation adds pressure on margins.

C. Healthcare

Overview

The FMCG healthcare sector in India encompasses medical devices, OTC medicines, nutraceuticals, health supplements, hygiene products and hospital consumables. With an estimated market size of **INR 76 billion in 2024,**[32] the segment has seen strong momentum post-pandemic. Increasing focus on preventive health, growing consumer trust in Ayurveda and natural ingredients, and expanding self-care are key growth drivers. The segment is regulated mainly to enhance:

- **Patient safety:** By ensuring critical equipment and consumables are reliable and non-hazardous.
- **Standardise product quality:** By mandating uniform quality across manufacturers and importers.
- **Regulating imports:** By preventing the influx of substandard foreign medical products.
- **Encouraging domestic manufacturing:** In alignment with India's push for self-reliance in health infrastructure and "Make in India."

Currently, the segment is tightly regulated under different ministries and departments, such as:

- **Ministry of Health and Family Welfare (MoHFW):** India's primary policymaker for health-related products and services.
- **Central Drugs Standard Control Organisation (CDSCO):** This organisation regulates OTC medications, diagnostic devices, surgical products, etc. It also issues manufacturing licences and approvals for product marketing.
- **Food Safety and Standards Authority of India (FSSAI):** Under the Ministry of Health, it regulates nutraceuticals, functional foods, dietary supplements and food for special medical purposes. Additionally, it defines standards for labelling, health claims and safety.
- **Department for Promotion of Industry and Internal Trade (DPIIT):** To issue QCOs for medical and wellness products used in FMCG, e.g., surgical gloves, antiseptic liquids and packaging material. Furthermore, DPIIT coordinates with BIS to make certification mandatory under QCO.
- **Bureau of Indian Standards (BIS):** It ensures implementation of Indian Standards (IS codes) and QCOs for items such as syringes, thermometers, healthcare packaging and disinfectants.

[31] Primary Discussions
[32] https://www.imarcgroup.com/india-beauty-personal-care-market

Current QCO landscape in healthcare

Product category	QCO status	Notes
Medical devices	BIS standards exist	66 categories covered (e.g., BP monitors, nebulisers and glucometers).
Surgical instruments	QCOs notified	Includes forceps, scissors and other tools.
Wheelchairs and walking aids	QCOs issued	BIS-certified designs mandated.
Hospital beds and furniture	Under consideration	BIS standards are being formalised for future QCO coverage.
Disposable gloves and PPE kits	Under consideration	BIS standards exist; QCO has been under consideration since the COVID-19 experience.
Condoms, syringes, needles	No QCO	Under the Drugs and Cosmetics Act, QCOs supplement BIS certification.
Health supplements and nutraceuticals	No QCO	FSSAI regulated, BIS involved in packaging standards; QCOs being considered.

Segment-specific challenge[33]

Regulatory overlap

- Healthcare products are already covered by multiple regulatory bodies such as CDSCO, FSSAI and BIS, thus creating compliance ambiguity. Example: A health supplement/nutraceutical may require FSSAI and BIS clearance under different QCOs.

D. Food and beverage

Overview

The F&B sector in India is primarily governed by the **Food Safety and Standards Authority of India (FSSAI).** Over the past couple of years, the government has started implementing QCOs under the BIS and DPIIT to regulate the packaging materials, food-grade containers and food contact substances critical to product safety. For example, BIS has consolidated multiple older standards into IS 18427:2024,[34] which requires certification for three-piece round open-top metal cans for packaging foods such as butter, cheese and other products.

While QCOs do not regulate food products themselves (which remain under FSSAI), they are being increasingly applied to support the ecosystem of the F&B industry and facilitate ease of doing business.

- In February 2024,[35] the government approved that only FSSAI certification would be mandatory for foods, and separate BIS/Agmark requirements would be removed. Once enforced, this would ease compliance for food businesses by reducing the number of mandatory certification requirements to just a single FSSAI certification (though packaging standards would still apply).
- In May 2025, FSSAI revised packaging rules to allow certain recycled plastics in food-grade packaging (with strict traceability and migration limits). However, these sustainability-focused changes are not harmonised with any BIS QCOs covering packaging materials.

[33] Primary Discussions
[34] https://www.services.bis.gov.in/php/BIS_2.0/bisconnect/standard_review/Standard_review/Isdetails?ID=MzE1OTY%3D
[35] Media article

Current QCO landscape in food and beverage

The food and beverage market is primarily regulated under FSSAI; however, besides food ingredients, packaging is an area where QCO is likely to expand its coverage.

Category	QCO status	Notes
Food contact plastics	No QCO	BIS Standards Exist – IS 10146,[36] IS 9845; regulates the safety of packaging plastics for food.
Plastic containers and utensils	Mandatory QCO[37]	QCOs notified for plasticware used in food service (October 2023).
Aluminium foil for packaging	Under consideration	BIS standard IS 8970 applies; QCO proposal under evaluation.
Paper-based food packaging	Under consideration	BIS is drafting standards for QCO rollout.
Bottled water/packaged water	No QCO	BIS IS 14543[38] applies, but enforced through FSSAI, no QCO yet.
Refrigerators/Storage units	QCO notified	ISI certification is required for energy efficiency & food-grade safety.
Catering utensils/cutlery	No QCO	BIS standards exist for stainless steel, melamine and food-grade ceramic items.

Segment-specific challenge[39]



Regulatory overlap

- Food products already have compliance requirements under FSSAI regulations.
- QCO will add a an additional layer of requirements, creating duplication of effort for manufacturers.



Increased costs

- QCO mandates using quality raw materials, product testing, factory inspections, documentation, etc., which increases costs.
- For small and medium manufacturers, these costs form a significant part and pose a threat to business viability.

[36] https://www.services.bis.gov.in/php/BIS_2.0/bisconnect/knowyourstandards/Indian_standards/isdetails/OTIz
[37] https://www.bis.gov.in/wp-content/uploads/2023/08/Cookwareand-Utensils-QCO-2023.pdf
[38] https://www.bis.gov.in/wp-content/uploads/2020/05/PM-PDW-IS-14543.pdf
[39] Primary discussions

6. Recommendations and conclusion

Implementing QCOs across FMCG segments marks a significant step towards ensuring product standardisation, consumer safety and manufacturing excellence. While these regulations present a transformative opportunity for elevating quality benchmarks, they also bring operational and compliance challenges across the FMCG value chain. Below are some recommendations that balance regulatory intent with industry readiness, ensuring smooth implementation and long-term sectoral growth.



Manufacturing and packaging

- A common artwork or universal packaging for multi-site manufacturing (brand-owned or third-party owned) is recommended through simplified packaging by listing manufacturing locations and their respective BIS licence numbers to ensure traceability without unnecessary burdens. For example:
  - Hygiene products such as sanitary napkins and diapers, due to their bulkiness and widespread distribution, are often produced at multiple locations.
  - Separate packaging requirements for each site lead to operational inefficiencies, increased plastic waste, higher costs and other complexities.
  - Modifications at any later stages due to regulation, content, legal upgrades, etc., are complex and increase product cycle time (from 2–3 months to 4–6 months).



Testing and other infrastructure

- Today, some of the large multinational companies and most of the SMEs face a lack of standard testing (for example, volatile organic impurities, nitrosamine impurities and other testing) facilities. Additionally, many existing labs are not well equipped to conduct varied tests, such as a payoff test for lipstick. Thus, investments in increasing the infrastructure of BIS-recognised labs and inspection capacity, particularly for niche categories (e.g., beauty and personal care raw materials, eco-cleaners, nutraceuticals, etc) should be focused.
- As some companies use third-party testing facilities, strict guidelines and strengthening of regional lab networks should be focused on to enhance access to quality labs.
- Each company has a unique product formulation. Thus, product tests or the product qualification method vary based on the product being tested (for example, the same testing method cannot be applied to food and cosmetics). Thus, guidelines and SoPs should be designed at the product and SKU level to ensure the quality of external testing labs.



Import and export

- With QCOs, importing raw materials and goods that are not available in India is a challenge. For example, titanium dioxide is not locally manufactured as its manufacturing is capital-intensive. Similarly, due to their niche demand, premature baby diapers are capital- and labour-intensive to manufacture locally and are largely imported. The government should align QCO implementation with industry expectations and market demand to ensure that the availability of such products is not impacted.
- Sudden changes in ingredients, regulations, packaging, etc., in any imported raw material adversely affect the entire supply chain (for example, Lauric acid imported from Indonesia and others). Thus, to ensure the availability of raw materials, the manufacturers and suppliers should be given adequate time (up to 2–3 months) to adapt to the changes.
- For materials unavailable in India or are not locally produced, the government should relax its import regulations and encourage local manufacturing, for example, premature baby diapers (which are currently imported mainly from China, followed by Japan).
- Foreign manufacturing sites often produce goods to export to multiple countries. Changing product specifications to meet one country's standards can raise production costs and impact quality or pricing for foreign markets. For instance, complying with BIS in India may require changes that conflict with globally accepted IEC certifications. To ease such disruptions, it is recommended that the Indian government pursue government-to-government collaborations with select countries to facilitate mutual recognition of standards. Thus, this will enable reciprocal acceptance of standards to simplify compliance, reduce trade barriers, foster a more competitive market environment and support export growth. This initiative aims to increase trade opportunities and economic development for all parties involved.
- With the government's push for "Make in India," these QCOs should be aligned with international standards and market trends. As a QCO, it will help India export goods to other countries and drive India's aim of being an export hub.

Marking fees

- As sanitary napkins and baby diapers have material and functional similarities. BIS should consider aligning the marking fees for sanitary napkins with those of baby diapers. This would help create a more balanced and equitable regulatory environment for both products.

Legacy stock

- The sale, distribution and exhibition of legacy stocks (especially for basic hygiene products) for their full lifecycle, i.e., till their entire shelf life, should be allowed under a QCO to prevent market shortages and unnecessary environmental impact.
- For example, the leather goods industry, where an extension of three years to finish off the legacy stocks has already been given to protect the industry. A similar arrangement can be done for other industries, such as personal hygiene products (sanitary napkins), where the current product life cycle is three years. Still, the legacy stock clearance timeline is only six months.
- QCO should clearly articulate guidelines for manufacturers, distributors, retailers, e-commerce, etc. For example, in certain instances, even when manufacturers have clarity, distributors and retailers interpret QCOs differently, often believing that stocking and selling legacy inventory is prohibited.

Implementation of QCO

- Each QCO should include a well-defined phase-wise implementation strategy and guidelines to strengthen each stakeholder and reduce ambiguity.
- The industry should be held accountable by mandating the industry players to submit a self-declaration (notifying whether they meet the requirements). Example: The USFDA (US Food and Drug Administration) is working on nitrosamine impurities through self-declaration.
- Increase coordination between ministries, departments and other stakeholders to improve the visibility of any new or upcoming QCO so that the industry is prepared and aware.
- To avoid regulatory overlap, efforts should be made to strengthen existing regulations rather than create a parallel regulatory framework such as QCO. For example, if there are existing specifications regarding any product standard, but they are limited, then more specifications should be added to strengthen the existing quality standard.

Industry consultations and feedback loops

- Industry stakeholders should be involved in the early stages of standard development and QCO planning for deeper industry alignment.
- Sector-specific advisory panels should be set up to address practical implementation issues.

Other recommendations

- A sector such as FMCG, which has interconnected, integrated global supply chains, should be given longer timelines and stakeholder consultations, as changes induced by a QCO can disrupt global supply chains.



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