
Sub: Request for exempting SEZ units from the purview of NPOP regulations.

3 messages

Director General SEZEPC <dg@sezepc.in>

23 June 2026 at 14:01

To: csoffice@nic.in, chairman@apeda.gov.in, nitinkyadav.ias@gov.in

Cc: ddg ddg <ddg@sezepc.in>, "Vimal ANAND JS(SEZ)" <vimal.anand@nic.in>, "Sh Ajay Bhadoo AS(SEZ)" <astpd-doc@nic.in>

Dear Sir,

This is regarding a long pending issue of exempting import of organic raw material for the purpose of export by SEZ Units from the National Programme for Organic Production (NPOP) regulations.

In this regard please refer to the recently published draft procedures by APEDA regarding organic raw material imports and re-exports from SEZs.

We have received multiple representations from members expressing concern that the proposed regulations may only hinder the smooth functioning of SEZ units. The additional procedural requirements could result in delays and increased costs, which may adversely impact the Government of India's objective of "Ease of Doing Business" and discourage overseas trade opportunities.

In this context, we would like to submit the following points for your consideration in respect of SEZ units which are importing raw material for producing goods for exports:

- DGFT has earlier exempted SEZ units and EOUs from the mandatory QCOs issued by different Ministries if the goods are imported for export purpose vide DGFT notification No 71/2023 dated 11.3.2024 and No 20/2026-27 dated 02.06.2026 (copies attached) .
- SEZ units are importing raw material for the purpose of exports only. Therefore, applying NPOP (a domestic requirement) to these units may not be appropriate as the product importing there are not going to compete with Indian organic products in the Indian market. In any case, they will be stiafying the importing requirement of the importing country (US/EU, etc.)
- The goods handled by SEZ units are neither produced nor sold in the domestic market, making compliance with NPOP regulations unnecessary and burdensome.
- Mandatory prior approvals from Certification Bodies for each import introduce delays without adding value.
- Duplication of testing requirements—both for importing country standards and NPOP—results in increased costs and operational inefficiency.
- Packaging and labelling requirements under NPOP may conflict with the specifications required by importing countries.
- The restriction limiting exports to certain markets (such as the USA) reduces competitiveness and global market access for SEZ units.

In light of the above, it is requested that the DoC may consider exempting SEZ units which are importing raw material for re-exports from Organic NPOP regulations (domestic requirement) similar to the exemption given to SEZ units from applicability of mandatory Quality Control Orders (QCOs) under BIS Act vide DGFT Notification No. 71/2023 dated 11.3.2024 and 20 /2026-27 dated 02.06.2026.

Regards

Alok Chaturvedi
DG SEZEPC (erstwhile EPCES)

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----- Forwarded message -----

From: **Director General SEZEPC** <dg@sezepc.in>

Date: Thu, 28 May 2026 at 19:11

Subject: Modifications required in the APEDA draft procedures for Organic raw material imports & re-exports from SEZ units

To: <chairman@apeda.gov.in>, <csoffice@nic.in>, <nitinkyadav.ias@gov.in>, ddg ddg <ddg@sezepc.in>

Dear Sir

Please refer to the draft procedures dor Organic raw material imports and reexports from SEZs ublished by APEDA.

The draft procedures have been examined by our members.

We have received the suggestions for slight changes to improve the ease of doing business and serving the basic purpose of SEZs that export from SEZs using imported material should be unhindered by domestic regulations as long as it is meeting the requirements of the importing country and clients abroad.

A copy of the same is attached.

It is requested that the same may also be considered to be included in the final version of the guidelines.

Thanks and regards

Alok Chaturvedi

DG EPCES

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4 attachments



Procedure_2_NOP_Imported_ingredients_re_export_to_USA_from_SEZ.pdf
353K



1 SEZ Organic Import recommendations May 2026-1.docx.docx
9K