

High-Level Committee on Non-Financial Regulatory Reforms (HLC-NFRR)





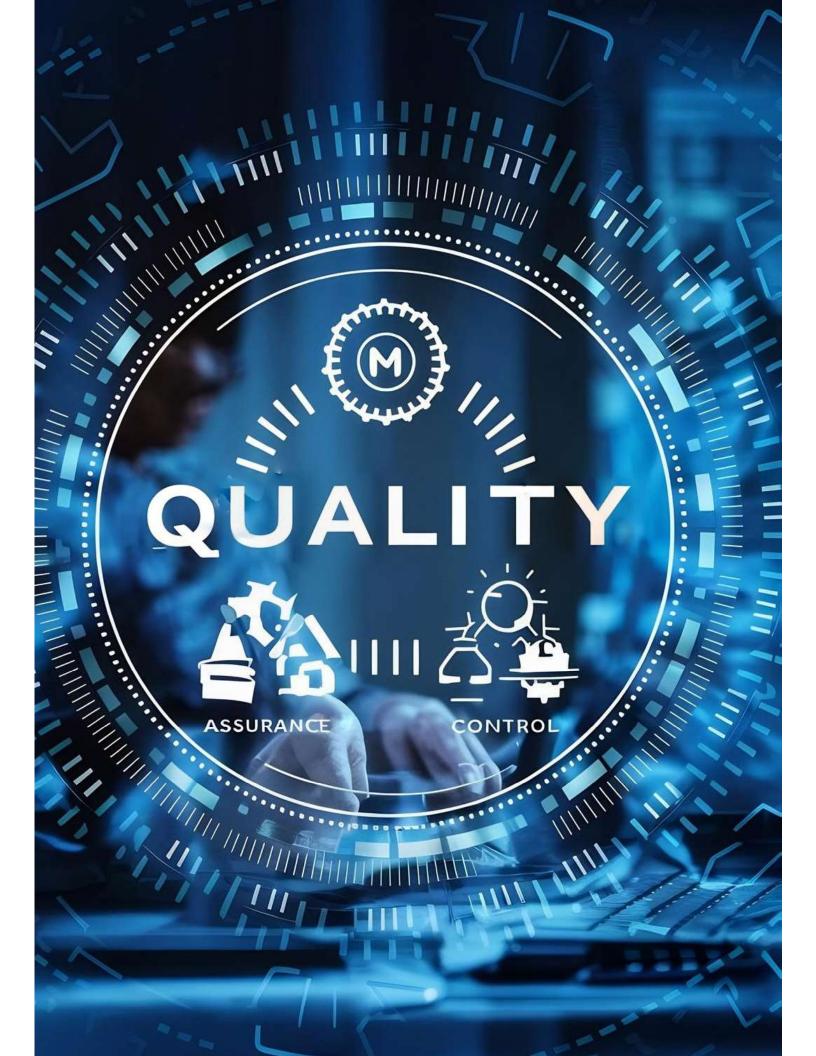
High-Level Committee on Non-Financial Regulatory Reforms (HLC-NFRR)

2nd Report October 2025



Contents

	Executive Summary	5
1.	Introduction	7
2.	Impact of QCOs	9
3.	Stakeholder Consultations	11
4.	Criteria to evaluate Quality Control Orders	13
5.	Recommendations	15
	Reform 1: Revoke QCOs on synthetic fibres, yarns and inputs	15
	Reform 2: Revoke QCOs on plastics and polymers	18
	Reform 3: Revoke QCOs on base metals	20
	Reform 4: Suspend implementation of QCOs in certain Steel product categories.	22
	Reform 5: Revoke Steel Import Monitoring System and the NOC process for import of non-QCO grades of steel	27
	Reform 6: Revoke QCOs in Footwear and Electronics Components	29
	Reform 7: Defer implementation and refer to IMG for review of all upcoming QCOs in RM, Intermediate Goods and Capital Goods	31
6.	Summary of Recommendations	33
7.	Appendix	37
8.	Annexure	49



Executive Summary

India's quality-control framework has seen substantial expansion over the past decade, reflecting sustained policy efforts to enhance product standards, consumer safety, and the global credibility of Indian manufacturing. The number of products covered under Quality Control Orders (QCOs) have increased from fewer than 70 in 2016 to nearly 790 in 2025, covering raw materials, intermediates, consumer products and capital goods. This move aims to strengthen India's quality ecosystem and support domestic manufacturing. While the mandatory enforcement of quality standards has contributed towards these objectives, it has also introduced challenges related to industry preparedness, the adequacy of testing infrastructure and availability and cost of critical inputs.

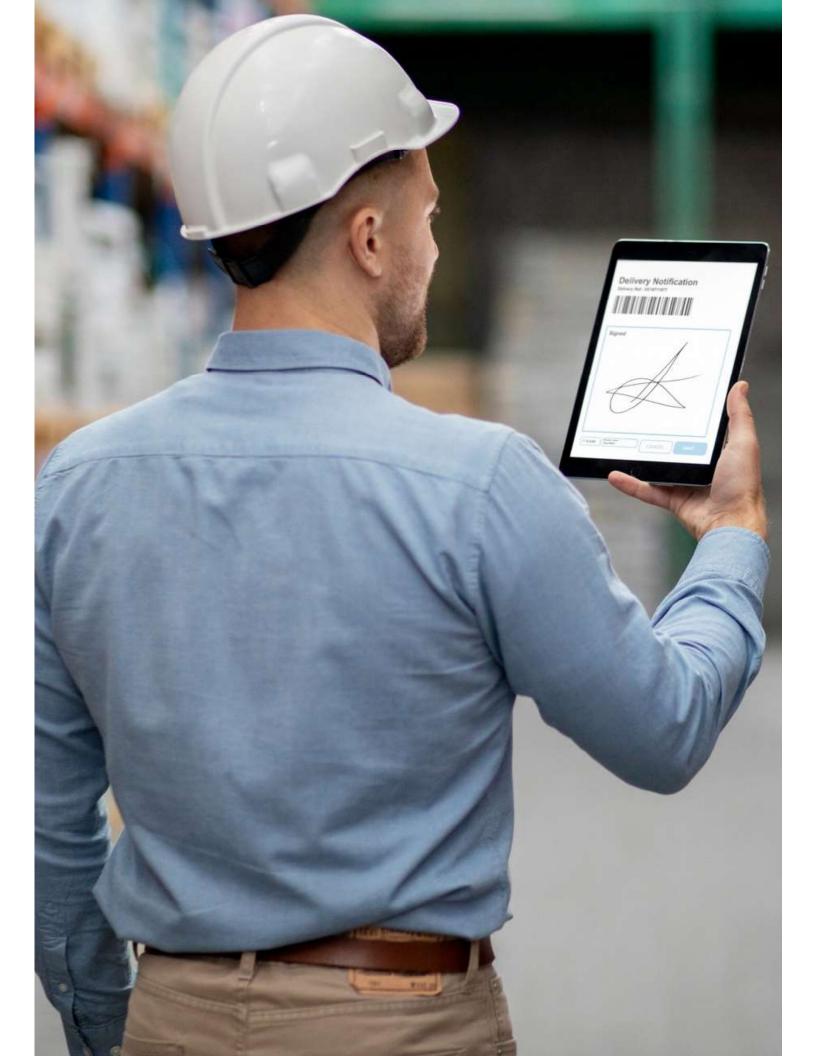
Among the total QCOs, introduced, a significant number applies to raw materials, intermediates and capital goods that feed into downstream production, rather than to finished goods consumed directly. While this has improved quality oversight across several segments of the manufacturing value chain, international practice generally focuses mandatory certification on end-use products or on cases involving direct implications on safety, health, or the environment. QCOs on raw material and intermediates in particular have introduced additional compliance requirements and operational complexities for industry. Stakeholder consultations have highlighted concerns regarding certification timelines, which are often affected by limited availability of accredited testing facilities and overlapping regulatory mandates. BIS certification process for domestic and foreign suppliers can extend over several months, given the requirement of factory inspection for most products covered under QCOs. These factors have, in certain instances, contributed to supply chain disruptions, increased input costs and production delays for downstream industries.

Recommendations given in this report are based on the basic principle that Quality Control Orders should primarily be limited to finished goods that have direct implications for consumer safety, health or product quality. For raw materials, intermediates and capital goods quality assurance objectives could be effectively addressed through voluntary standards, industry best practices and buyer-seller assurance.

The report evaluated primarily QCOs on raw materials, and intermediate products on four criteria: whether the product poses a direct safety or environmental risk, the downstream impact on domestic manufacturing and value addition particularly MSMEs and exporters, the adequacy of domestic manufacturing and testing capacity, and whether there is an equivalent international regulation. Application of this framework indicates a need for targeted recalibration in five major product groups.

The report recommends revocation of QCOs on synthetic fibres, plastics and polymers, base metals and some of the inputs for footwear and electronics sectors. For steel, the report recommends retaining QCOs for construction and pressure-vessel categories. For other steel product lines of raw materials and intermediates, the recommendation is to suspend QCOs. Subsequently, if the Ministry of Steel deems it necessary, it may refer specific product categories to Inter Ministerial Group (IMG) for review and reconsideration. Steel Import Monitoring System (SIMS) and NOC process, for grades of steel not covered under BIS, are recommended to be revoked as there are existing mechanisms available with Directorate General of Foreign Trade (DGFT), the designated nodal agency for monitoring of exports and imports.

These recommendations aim to align India's quality framework more closely with international practices while minimizing potential impacts on manufacturing competitiveness. These seek to strengthen the national quality ecosystem by regulatory focus on products with significant safety or quality implications, thereby supporting competitiveness, innovation, and ease of doing business.



CHAPTER 1 - INTRODUCTION

- 1.1. High-Level Committee (HLC) on Non-Financial Regulatory Reforms (NFRR) has been constituted vide Cabinet Secretariat notification dated 19th August 2025. The notification is attached in Annexure-1. The prime objective of this High-Level Committee is to address the regulatory barriers at the Central level. HLC-NFRR has been mandated to review the non-financial sector regulations, certifications, licenses, and permissions, pertaining to the Union Government and to develop a modern, flexible, people-friendly and trust-based regulatory framework appropriate for the 21st century.
- 1.2. HLC-NFRR in its first report made recommendations on 38 reform areas which include the following recommendations on process reforms in BIS.
 - Reform 1 Rationalisation and consolidation of 10 existing schemes into two principal schemes:
 - a) Scheme I General Products: Applicable to low-risk, non-critical products; compliance enforced via self-declaration or simplified certification. Factory visits to be removed, and market surveillance should serve as the primary enforcement mechanism.
 - b) Scheme II High-Risk Products: Applicable to products with significant impact on safety, health, or the environment; compliance enforced through risk-based audits, testing, and mandatory certification.
 - c) Scheme I to be made the default scheme for all new items.
 - d) Items, if any, to be placed under Scheme II should only be on the recommendation of the Inter-Ministerial Group on Quality Control Order (QCO) Assessment, formed vide Cabinet Secretariat OM No. 5/6/2025 dated 22 May 2025.
 - e) Items of all the existing 10 Schemes to be suitably placed in either of above mentioned two schemes on the recommendation of the Inter-Ministerial Group on Quality Control Order (QCO) Assessment.
 - Reform 2 Increasing the validity of BIS licences at first-pass from 1–2 years to 5 years for products
 - a) Grant perpetual license at renewal stage
 - b) Mandate payment of licence fee annually

- 1.3. These recommendations have already been shared with the Department of Consumer Affairs and BIS for implementation by November 30, 2025. Once implemented, these reforms will considerably ease the regulatory burden of businesses.
- 1.4. In the present report, HLC has extensively examined the QCOs across important sectors and has recommended reforms across 7 areas relevant to these sectors. Recommendations include revocation of QCOs on 27 products, out of which 10 are yet to be implemented, suspension of QCOs on 112 products and deferment of QCOs on the remaining 69 upcoming QCO product categories. Thus, these recommendations relate to 208 out of a total of 790 QCO products, consisting primarily of raw materials, intermediates, and capital goods.
- 1.5. Over the past decade, India's quality regulatory framework has evolved significantly with the expansion of QCOs issued under the Bureau of Indian Standards (BIS) framework. While QCOs are introduced to enhance consumer safety and promote high-quality manufacturing, their scope has extended beyond finished goods to encompass raw materials, intermediates, and capital goods that are critical for downstream industries.
- 1.6. Between 2016 and 2025, the number of products brought under mandatory QCO coverage has grown from less than 70 to nearly 790 products including one Omnibus Technical Requirement (OTR) that covers 20 products. A majority of QCOs have been introduced over the past 5 years with nearly 70 percent pertaining to raw- materials, intermediates, or capital-goods rather than finished consumer products. While this expansion reflects India's commitment to enhancing product quality and strengthening confidence in "Made-in-India" manufacturing, it has also posed certain challenges, particularly for MSMEs and export-oriented sectors that are dependent on imported inputs. Thus, in many cases, the implementation of these QCOs has resulted in unintended consequences affecting manufacturing competitiveness and the broader objectives of the Make in India initiative.
- 1.7. While maintaining high product quality is essential, it is also important to ensure that regulatory measures are balanced and practical. Regulations play a vital role in promoting safety, consistency and fairness; however, overly restrictive regulations may limit innovation, increase costs, and affect supply chains. A balanced approach can uphold quality and consumer protection while enabling businesses the flexibility to innovate and grow efficiently.
- 1.8. Accordingly, this report reviews the status and impact of QCOs across key sectors and recommends a set of seven targeted reforms aimed at restoring balance between quality regulation and industrial competitiveness.

CHAPTER 2 IMPACT OF QCOS

QCOs have been issued with the primary objective of ensuring quality standards of products. In this regard different ministries/departments have issued multiple orders covering a range of products. However, these QCOs have unintended consequences causing adverse impact on the manufacturing sector on account of following reasons -

2.1. DISRUPTION OF SUPPLY CHAINS

- 2.1.1 Several QCOs cover product categories such as polymers, steel, rubber, chemicals, metals, and fibres which serve as critical inputs for a significant portion of the value added manufacturing sector. International benchmarking indicates that major manufacturing economies including the EU, USA, Japan, or Vietnam generally do not require mandatory factory-level certification for such upstream product categories.
- 2.1.2 The cross-cutting coverage of QCOs in India has disrupted supply chains in sectors ranging from textiles and apparel to automotive components, plastics, and electronics, where firms depend on imported grades unavailable locally. For example, restrictions on polyester fibre and yarn, EVA copolymers, or CRGO electrical steel have forced plants to run below capacity, raised input prices by 10–30 percent, and constrained exports.

2.2. DISPROPORTIONATE BURDEN ON MSMEs

2.2.1 MSMEs have been among the most affected due to imposition of QCOs as they often face financial and logistical challenges in meeting the associated certification, testing, and factory- inspection requirements. Testing backlogs at BIS-approved laboratories can extend over several months, while the cost of obtaining and renewing licenses may be prohibitive for small enterprises operating with limited margins. Furthermore, unlike exporters located in SEZs, MSMEs operating in the domestic tariff area (DTA) with mixed domestic and export portfolios often lack access to exempted import channels, thereby reducing their competitiveness in both domestic and international markets..

2.3. EROSION OF EXPORT COMPETITIVENESS

2.3.1 Due to challenges faced by global suppliers in obtaining BIS certification, the implementation of QCOs has, in effect, led to greater concentration among domestic suppliers in some sectors, giving them the ability to raise prices above global levels. For instance, Polyester fibre, yarn, and some steel products command 15–30 percent price premiums over global

benchmarks, affecting the cost competitiveness of downstream industries in the international market. This is one of the main reasons for India's declining share in global apparel exports despite the withdrawal of anti-dumping duties on select products.

2.4. DUPLICATION OF STANDARDS AND REGULATORY OVERLAP

- 2.4.1 In several product categories, finished goods are already regulated through established safety or performance standards. However, QCOs have also been extended to cover the inputs used in the production of these finished products. This dual application of QCOs- at both the input and finished goods stages- is particularly evident in sectors such as steel, copper, aluminum and polyester value chains.
- 2.4.2 This duplication not only increases administrative burden but also creates potential ambiguities regarding prevailing standards, thereby adding to the uncertainty faced by both domestic producers and importers.

2.5. INNOVATION, R&D AND TECHNOLOGY TRANSFER

- 2.5.1 Mandatory certification for niche or specialised materials have, in some instances, discouraged high-technology suppliers from seeking BIS registration. Such suppliers often cite concerns related to Intellectual Property over plant inspections or limited volumes that do not justify the associated cost and administrative efforts of getting the certification. This has restricted the availability of advanced inputs essential for sectors like electronics, EV components, and modern footwear, thereby slowing the pace of India's progress in moving up in the global product value chain.
- 2.5.2 Stakeholders in the electronics and advanced materials have observed that several newly introduced BIS standards do not have the corresponding international equivalents. As a result, firms are often required to modify their production to meet India-specific norms which may not be aligned with prevailing export standards. This has, in some cases, led to higher compliance costs and may also discourage technology transfer and foreign investment in innovation-driven industries.

The Committee took note of above challenges and deliberated extensively in its meetings while finalizing the recommendations on QCOs.

CHAPTER 3 STAKEHOLDER CONSULTATIONS

The HLC held extensive stakeholder consultations on 6th September, 15th September, and 14th October 2025 to gather industry inputs on the impact of the current QCO regulatory framework on competitiveness of the manufacturing sector and ease of doing business. Major industry associations such as CII, FICCI, ASSOCHAM, CITI, PHDCCI, India SME Forum, FISME, CEAMA, the All India MSME Footwear Council, and the SME Chamber of India participated. Consultations were also held with key ministries and departments, including M/o Steel, M/o Mines, DPIIT, D/o Chemicals & Petrochemicals, M/o Textiles, MEITY, M/o Petroleum & Natural Gas, M/o MSME, D/o Consumer Affairs and BIS.

The key insights emerging from these consultations are summarised below:

3.1. IMPORTANCE OF QUALITY

All stakeholders underscored the importance of building a robust and credible quality ecosystem. While many emphasised that quality enhancement is best driven through voluntary certification and market incentive, some stakeholders highlighted the necessity of mandatory QCOs to ensure meaningful impact, particularly for products with significant health and safety implications.

3.2. MULTIPLICITY OF STANDARDS

Stakeholders noted that, in some instances, overarching standards already regulate the final products - and extending mandatory certification to raw material adds compliance burden. In certain cases, raw materials are subject to regulation whereas the corresponding finished goods remain exempt, creating inconsistencies and undesirable situation. The introduction of separate QCOs for raw materials used in such products can therefore lead to duplication and increased compliance burden.

3.3. DISRUPTION OF VALUE CHAINS DUE TO QCOS

The extension of QCOs to critical raw materials and intermediate products has affected value chains in sectors that are dependent on key inputs like steel, polymers, essential chemicals and synthetic fibres. As India's manufacturing base continues to develop, the country remains partially dependent on imports of certain niche products and needs input for specialty products. Consequently, broad based QCOs on product categories have created challenges for a large range of downstream industries that depend on these raw materials.

3.4. IMPACT ON MSMES

Many stakeholders, particularly those from MSME and labour-intensive sectors like garments, footwear, and kitchenware highlighted a the dual challenge faced by them.

First, obtaining BIS certification can be costly and difficult for small companies. Second, the QCOs on raw materials like steel and fibre has, in some cases, affected their competitiveness in manufacturing, in general, and exports market in particular.

3.5. TESTING INFRASTRUCTURE

Stakeholders pointed out that the expansion of QCOs has led to a significant increase in testing requirements, while the availability of authorised/accredited testing facilities has not kept pace with this demand. To address this, they suggested expanding the testing infrastructure by allowing greater participation of both captive and third party testing labs to enhance testing capacity and reduce delays. This is particularly important for certifying facilities located outside India, where completing BIS visits can take several months.

3.6. INDUSTRY CONSULTATION AND IMPACT ASSESSMENT

Stakeholders broadly agreed on the importance of conducting structured consultations with industry stakeholders prior to issuance of QCOs. It was also suggested that independent impact assessments covering aspects related to employment, costs, and strategic industries may be undertaken before imposition of such QCOs. Additionally, several stakeholders emphasised the need for adequate preparation time before implementation of QCOs and also for longer validity of certification issued by BIS.

3.7. SCOPE OF QCOs

Stakeholders pointed out that certain dimensional specifications included in some standards do not directly affect product safety or quality and are unique to India. This creates compliance challenges, particularly when sourcing materials or products from International suppliers. Additionally, some of the QCOs apply to products that are custom built for OEMs and do not fall under any mandatory global standards. Stakeholders suggested that such products could be considered for exemption from mandatory certification requirements.

3.8. SUPPORT OF QCOs

Some stakeholders expressed support for QCOs. In addition to emphasising the importance of maintaining product quality, they noted that for many products categories, sufficient domestic capacity exists and such Indian companies need to be protected from low-cost imports, particularly from certain neighbouring countries. Some stakeholders further observed that similar regulatory measures are adopted in other economies in order to manage import quality and safeguard domestic industries.

Feedback from stakeholders has been duly considered by the HLC while arriving at the recommendations.

CHAPTER 4 CRITERIA TO EVALUATE QUALITY CONTROL ORDERS

- 4.1. The application of QCOs should be guided by the principle that mandatory certification is most appropriate for finished goods with direct implication for safety, health, or product quality, and not for raw materials or intermediate products used within the manufacturing value chain.
- 4.2. Raw materials and intermediates serve as inputs for finished products that are already subject to established testing protocols, regulatory oversight, or consumer-quality scrutiny. Extending mandatory compliance to such inputs at source can lead to duplication of compliance requirements and dilute accountability for overall quality assurance. Downstream manufacturers are generally best positioned to evaluate and ensure the quality of the materials they use, as their end-products are ultimately tested, certified, or inspected in accordance with applicable safety and performance standards.
- 4.3. This report examined QCOs on raw materials and intermediate goods on four criteria.

4.3.1 Health and Safety Risk Assessment

- (a) The starting point for any QCO is the degree of direct health, safety, or environmental risk associated with non-conformity. Mandatory certification may be justified when product failure can cause tangible harm e.g. construction materials, electrical goods, or protective equipment. However, when the product do not possess a direct risk to consumer or environment, imposing statutory regulation may introduce unnecessary friction to supply chains. Therefore, this criterion assesses whether non-conformity of a product poses a direct and material risk to human health, public safety, or the environment. This approach implies that QCOs should be applied primarily to product categories where product failure could endanger life or safety, while industrial inputs without a direct consumer interface should remain outside compulsory certification
- (b) In some cases, a product may serve as an input for an end product which has critical health and safety consequences. In such cases, if the end product is adequately regulated, imposing additional quality standards on raw material may not be necessary. For example, while synthetic fiber is used for making bullet proof jackets, mandating quality checks on jackets by itself is sufficient and there is no need to separately impose quality standards on fiber used in their manufacturing.

4.3.2 Downstream impact on Exports and MSMEs

- (a) QCOs on raw materials and intermediate products create supply disruptions and raise costs for downstream players. This reduces India's competitiveness in the exports market. Imported input when used for exports is exempted from QCOs. However, in most cases, the input goes into intermediate products which is then used by exporters. This exemption is also not available to manufacturers serving both domestic and exports markets.
- (b) Further, MSMEs have limited resources to get the required certification. The certification requirements as well as raw material issues have a disproportionate impact on their competitiveness.

4.3.3 Domestic Capacity Adequacy, Testing Capacity and Price Impact

This criterion assesses whether domestic production capacity across grades and specifications is sufficient to meet market demand in the event of import restriction. While certain raw materials have adequate domestic capacity at an aggregate level, there are several specialized grades within these categories for which currently country is not having the required capacity and capability. For example, although India has adequate capacity for flat steel, many of the coated specialized products for automotives and durables are required to be imported. Imposing QCOs on such products could risk - disrupting supply chain. Additionally, the existing testing capacity in the country is limited and expansion of the QCOs places further pressure on available testing laboratories.

4.3.4 Global Benchmarking

This criterion evaluates India's quality regulation for a given product category in comparison with practices followed in major economies, to determine whether similar products are subject to mandatory certification globally. The rationale is to maintain conformity with global good practices, products that are not subject to compulsory certification in the major jurisdictions should, as a general principle, remain under voluntary or contractual quality-assurance frameworks.

CHAPTER 5 RECOMMENDATIONS

Reform 1: Revoke QCOs on synthetic fibres, yarns and inputs

5.1. BACKGROUND

- 5.1.1 The synthetic textile value chain transforms raw man-made fibres into finished apparel. It begins with the conversion of chemicals such as Purified Terephthalic Acid (PTA) and Mono Ethylene Glycol (MEG) or raw pulp into fibres such as polyester staple fibre (PSF) and viscose staple fibre (VSF) or filament yarn, spun yarn. From yarn, the chain moves into synthetic fabric production through weaving or knitting. Finally, these fabrics are converted into man-made fibre (MMF) apparel for domestic consumption and export markets.
- 5.1.2 Between 2021 and 2024, eight QCOs—seven by the Department of Chemicals and Petrochemicals and one by the Ministry of Textiles, were issued, covering input of synthetic fibres (PTA and MEG), polyester staple fibre (PSF), polyester yarns (FDY, POY, IDY, PSY), and viscose staple fibre (VSF).
- 5.1.3 Indian spinners, weavers and garment manufacturers are unable to secure raw material of synthetic raw materials at globally competitive prices due to the imposition of QCOs on inputs. Industry consultations highlighted that the Indian synthetic fabric manufacturer faces 20-35% higher fibre and yarn price than the competing fabric manufacturers in other major exporting countries. Synthetic fabric makes up over 50% of garment manufacturing costs, and if such raw materials like PSF and VSF are uncompetitive due to higher costs and restrictive QCOs, the impact extends to downstream products as well. Ultimately, India made MMF apparel is not in a position to compete globally owing to higher input costs. Currently, India faces a 5-10% cost disadvantage at the factory gate on MMF garment exports against cost competitive countries such as Vietnam and Bangladesh.
- 5.1.4 The impact of these higher costs is already visible in export performance. MMF apparel exports to the European Union fell by 9% in the first nine months after QCO implementation, while exports to the United States stagnated. Since, there were no other significant policy or market changes between 2023 and 2024 except for the QCOs, this decline can be linked to QCOs. In the same period, competitors gained market share. Vietnam grew its exports by about 4% to the US and 6% to the EU. China achieved moderate growth in the U.S. market despite its already large base. With import demand in both the U.S. and the EU remaining stable, the subdued performance of India's textile industry indicates an erosion in price competitiveness rather than a slowdown in global demand.

5.2. RECOMMENDATION

- 5.2.1 Revoke following QCOs on synthetic fibres and yarns, and the inputs
 - (i) Purified Terephthalic Acid (PTA)
 - (ii) Mono-Ethylene Glycol (MEG)
 - (iii) 100% Polyester Spun Yarn (PSY)
 - (iv) Polyester Industrial Yarn (IDY)
 - (v) Polyester Staple Fibres (PSF)
 - (vi) Polyester Filament Fully Drawn Yarn (FDY)
 - (vii) Polyester Partially Oriented Yarn (POY)
 - (viii) Viscose Staple Fibre (VSF)

5.3. JUSTIFICATION

- **5.3.1.** Health / Safety Risk: Synthetic fibres and yarns do not inherently present direct health or safety risks to consumers. In cases where end-use applications involve safety consideration, such as in protective clothing or bullet-resistant gear, the finished products are subject to separate tests and compliance requirements.
- **5.3.2. Downstream Impact:** The QCOs have raised raw-material prices by 10–30 per cent when compared with global benchmarks, as only few domestic players are certified, and foreign suppliers face long lead times for BIS licensing. These cost increase cascade through the fibre-to-fabric-to-garment chain, reducing export competitiveness for apparel producers which cannot claim exemptions as they do not directly import fibres.
- 5.3.3. Domestic Capacity: Although India has significant installed capacity in polyester, supply gaps persist in specialised grades and blends required for export markets. In viscose, production is concentrated among a handful of firms, creating dependence on limited players. The resulting shortages and higher prices have forced several downstream units to operate below capacity.
- **5.3.4. Global Benchmarking:** No major textile-exporting country, including China, Vietnam, or Bangladesh, imposes mandatory factory-level certification on synthetic fibres or yarns or their input. Quality control is achieved through voluntary standards and buyer audits.
- **5.3.5. Post-QCO Impact:** Prior to the introduction of QCOs, India imported a significant volume of specialized fibers and yarns to address quality and variety gaps in domestic supply. Since the implementation of QCOs, imports of several such products have declined notably, not as a result

of substitution by domestic suppliers but because of certification-related challenges and limited BIS-approved sources.

5.4. IMPLEMENTATION ROADMAP AND TIMELINE

- 5.4.1. Revoke following QCOs on synthetic fibres and yarns, and the inputs
 - (i) Purified Terephthalic Acid (PTA)
 - (ii) Mono-Ethylene Glycol (MEG)
 - (iii) 100% Polyester Spun Yarn (PSY)
 - (iv) Polyester Industrial Yarn (IDY)
 - (v) Polyester Staple Fibres (PSF)
 - (vi) Polyester Filament Fully Drawn Yarn (FDY)
 - (vii) Polyester Partially Oriented Yarn (POY)
 - (viii) Viscose Staple Fibre (VSF)
- 5.4.2. Action: Department of Chemicals & Petrochemicals (i-vii) and Ministry of Textiles (viii)
- 5.4.3. Timeline: November 15, 2025

Reform 2: Revoke QCOs on plastics and polymers

6.1. BACKGROUND

- 6.1.1. Plastic resins and polymers such as linear low-density polyethylene (LLDPE) and acrylonitrile-butadiene styrene (ABS) are the building blocks for a vast range of downstream industries ranging from household goods, automotive components, consumer durables, packaging, footwear, and construction materials.
- 6.1.2. Since 2021, multiple QCOs have been issued by the Department of Chemicals and Petrochemicals covering more than a dozen polymer grades, some of which are yet to come into effect. These inputs are predominantly used by MSMEs that convert basic resin into finished products or components. Imposition of QCOs, where these have been implemented, has led to shortage of some of the specialty grades and also created a price premium in the range of 10-20% compared to China. This enhances challenges for manufacturers, particularly MSMEs and exporters across a range of sectors.

6.2. RECOMMENDATION

- 6.2.1. Revoke following QCOs on Plastics and Polymers
 - (i) Polyethylene (LDPE/LLDPE/HDPE)
 - (ii) ABS (Acrylonitrile- Butadiene- Styrene)
 - (iii) Polypropylene (PP)
 - (iv) Polyvinyl Chloride (PVC)
 - (v) EVA (Ethylene Vinyl Acetate)
 - (vi) Polyurethanes
 - (vii) Polycarbonate

6.3. JUSTIFICATION

- **6.3.1. Health / Safety Risk:** Base polymer resins do not pose direct consumersafety or environmental hazards in their unprocessed form. Product safety is determined by the characteristics of the finished item such as packaging, toys, or appliances, each of which is already regulated under separate standards, wherever necessary.
- **6.3.2. Downstream Impact:** The implementation of QCOs has affected raw-material availability and contributed to higher domestic prices relative to China. Many imported grades required for specialised moulding, film, and extrusion applications have become difficult to source because foreign suppliers, servicing small Indian volumes, are unwilling to undergo BIS factory inspection. This has led to production delays and increased costs for packaging, footwear, and engineering-plastic manufacturers.

- **6.3.3. Domestic Capacity:** While India has capacity in commodity polymers, it remains import-dependent for certain grades and performance resins, including ABS. ABS demand of around 50% is being met by imports while 50% is met by two large domestic players. This has resulted in the domestic supply market being concentrated for different grades of PE and ABS, and has also caused supply chain disruptions.
- **6.3.4. Global Benchmarking:** No major manufacturing economy imposes mandatory certification at the resin stage. Quality oversight is achieved through voluntary standards and end-product testing.

6.4. IMPLEMENTATION ROADMAP AND TIMELINE

- 6.4.1. Revoke QCOs on following plastics and polymers
 - (i) Polyethylene (LDPE/LLDPE/HDPE)
 - (ii) ABS (Acrylonitrile- Butadiene- Styrene)
 - (iii) Polypropylene (PP)*
 - (iv) Polyvinyl Chloride (PVC) *
 - (v) EVA (Ethylene Vinyl Acetate) *
 - (vi) Polyurethanes*
 - (vii) Polycarbonate*
- 6.4.2. Action: Department of Chemicals & Petrochemicals
- 6.4.3. Timeline: November 15, 2025

*These QCO's have been notified but not yet implemented. These are also recommended for revocation.

Reform 3: Revoke QCOs on base metals

7.1. BACKGROUND

- 7.1.1. Base metals such as copper, aluminium, and nickel powder are essential raw materials for India's engineering, automotive, construction, power and capital-goods industries. They form the backbone of multiple manufacturing ecosystems, ranging from electrical cables and switchgear to machinery, transport equipment, and decorative products.
- 7.1.2. Since 2023, a series of QCOs have been issued by the Ministry of Mines covering items like copper wire rods, copper and aluminium tubes, extruded and rolled products, and other semi-finished forms. These orders were introduced to curb low-grade imports and to promote domestic refining and downstream value addition.
- 7.1.3. India's base-metal landscape is highly heterogeneous. While primary smelting capacity has expanded over the past decade, domestic availability remains uneven across product grades and dimensions. Many high-precision or niche metal products used in electronics, automotive components, and renewable-energy equipment are still imported as domestic manufacturing capacity in these areas remain limited. Additionally, the domestic capacity for some of the metals on which QCOs are scheduled to be implemented including Refined Nickel, Tin and Lead is negligible. Consequently, QCOs on raw-material have had unintended adverse consequences for manufacturers, particularly MSMEs and exporters, relying on imported intermediate materials.

7.2. RECOMMENDATION

- 7.2.1. Revoke following QCOs on Base Metals -
 - (i) Copper
 - (ii) Aluminum & Alloys
 - (iii) Nickel Powder
 - (iv) Zinc
 - (v) Lead
 - (vi) Tin
 - (vii) Refined Nickel

7.3. JUSTIFICATION

7.3.1. Health / Safety Risk: Base metals do not pose direct consumer-safety or health hazards. Quality standards for end products (such as wiring, pipes, or structural components) already ensure product performance and safety. Extending statutory certification to metal feedstock therefore adds limited incremental value in protecting consumers.

- **7.3.2. Downstream Impact:** Mandatory certification has increased input prices and caused supply constraints, particularly for copper and aluminium grades that are not readily available domestically. Delays in obtaining BIS licences for foreign suppliers have disrupted production in sectors such as electrical equipment, renewable-energy hardware, and precision engineering, where timely material availability is critical.
- **7.3.3. Domestic Capacity:** India has a strong primary production base in aluminum but remains import-dependent for several downstream intermediates and alloyed grades. Aluminum capacity is largely concentrated among select large firms, while fabrication infrastructure for rolled, extruded, and foil products remains limited. In copper, refining capacity is close to one million tonnes, yet 96 percent of concentrate requirements are imported, and domestic mills lack the precision rolling and extrusion capability needed for export-grade sheets, foils, and tubes.

India has no primary nickel production and relies entirely on imports of refined nickel and nickel-based alloys, a gap identified as strategically significant given the growing demand from stainless steel, automotive, and electronics sectors.

- **7.3.4. Global Benchmarking:** No major economy mandates compulsory factory-level certification for base metal feedstock. International trade in metals is governed by ASTM, EN, or ISO specifications that are adopted contractually between buyer and supplier, not through regulatory QCOs.
- **7.3.5. QCOs impact:** The concentration of production among a few large players and limited downstream capacity across copper, aluminium, and nickel alloys has led to supply rigidity and price volatility after the implementation of QCO, particularly for MSMEs and export-oriented units that depend on specialised intermediate materials.

7.4. IMPLEMENTATION ROADMAP AND TIMELINES

- 7.4.1. Revocation of QCOs on following Base Metals:
 - (i) Copper
 - (ii) Aluminum & Alloys
 - (iii) Nickel Powder*
 - (iv) Zinc*
 - (v) Lead*
 - (vi) Tin*
 - (vii) Refined Nickel*
- 7.4.2. Action: Ministry of Mines
- 7.4.2. Timeline: November 15, 2025

*These QCO's have been notified but not yet implemented. These are also recommended for revocation.

Reform 4: Suspend implementation of QCOs in certain Steel product categories (except for construction and pressure vessels and pipes categories)

8.1. BACKGROUND

- 8.1.1. Steel is the backbone of any country's manufacturing economy, feeding into infrastructure, automotive, engineering goods, shipbuilding, construction, consumer durables, etc. While India is the world's second-largest steel producer, with total crude-steel capacity exceeding 160 million tonnes, it needs to continue to import critical high-grade, alloy, and electrical steels which are unavailable domestically.
- 8.1.2. QCO of the Ministry of Steel covers more than 160 products with vast majority of them being in the category of raw materials and intermediates. In order to examine the impact of these QCOs, products have been grouped on the basis of user industry. Categorization of QCOs is broad based and may contain certain overlaps as some of the products have usages in more than one category. These are discussed as follows:
 - (i) Engineered Products: The category covers precision/formulated steels and semi-finished/finished forms designed for performance in mechanical systems, e.g., spring steels, bearing steels, case-hardening steels, free-cutting steels, etc. These are the key inputs for machine components, gears/shafts, bearings, fasteners, forgings, tools, power-train parts, lifting/haulage chains, and high-duty hardware across capital goods, engineering, and construction equipment.
 - (ii) Auto/Durables/Aircraft: This category covers automotive-grade IF/ HSLA steels, advanced high-strength steels, micro-alloyed long/ flat products, formable cold- rolled and coated steels, and select aerospace-suitable alloy/stainless grades used in vehicles, white goods, rail/metro, and limited defence/ aerospace parts. Downstream uses include BIW/body panels, chassis and suspension members, wheels, fasteners, appliance cabinets/drums, and aero sub-components where BIS-mapped grades apply.
 - (iii) Electrical Grade: Electrical-grade steels include grain-oriented (CRGO) and non-grain oriented (CRNO) electrical steel sheets and strips, soft magnetic iron alloys, binding wires, and specialized stainless/magnetic materials used in energy transmission and electromechanical applications. These steels are engineered for specific magnetic permeability and low core-loss characteristics, enabling efficient functioning of transformers, electric motors, generators, switchgear, induction coils, and relay systems. Downstream users span across power distribution companies, appliance and white goods manufacturers, EV motor and rotor-stator assembly units, and industrial electrical equipment makers.

- (iv) Wires and Ropes: Steel wires and wire ropes include stranded, round, and suspension-grade variants designed for high tensile strength, flexibility, and fatigue resistance across hauling, lifting, mining, oil well drilling, and general engineering applications. These products serve as critical intermediate materials for sectors such as mining and mineral transport, logistics and warehousing (cranes, hoists, elevators), offshore and onshore oil exploration, construction machinery, and safety hauling systems in industrial installations.
- (v) Alloy Steel: Ferro alloys such as ferromanganese, silicomanganese, ferronickel, ferrosilicon, ferrovanadium, and ferromolybdenum serve as critical alloying inputs in steelmaking to enhance strength, hardness, wear resistance, and corrosion properties across automotive, defencegrade, tool steel, and high-performance industrial steel applications. These master alloys are used during secondary metallurgy and ladle refining to control deoxidation, desulphurization, and microstructure tuning, directly influencing the quality of high-grade steel outputs.
- (vi) Components used in domestic manufacturing of Consumer End Products: Consumer-facing steel products in this category primarily include cold-rolled stainless and carbon steel strips used in razor blades, kitchen utensils, and household stainless steel applications. These grades require high surface finish, corrosion resistance, edge-hardenability, and precise dimensional tolerances to meet hygiene, food-contact, and safety standards.
- (vii) Construction, Pressure Vessels and Pipes: This category includes several safety critical applications like plates for boilers, reactors, and heat-exchangers, seamless pipes and tubes for oil & gas, steam and fire-fighting lines. Typical products include boiler or pressure-vessel plates, seamless carbon and alloy steel pipes for high-temperature, stainless steel process pipes, line pipe and pre-stressing/expansion components used in piping networks. Required properties include weldability, notch toughness, corrosion resistance and dimensional stability for operational safety, leak-tightness, and lifecycle reliability across refineries, chemicals, power, and municipal pipelines.
 - Details of above categories of QCOs (accept construction, pressure vessels and pipes) are at Appendix.
- 8.1.3. Between 2020 and 2024, the Ministry of Steel issued a series of QCOs covering virtually the entire range of flat, long, and alloy steels, from hot-rolled coils and cold-rolled sheets to wire rods, rebar, stainless-steel plates, ferro-alloys, and tool steels. These orders were intended to raise quality standards and protect domestic producers from low-grade imports. However, the QCOs on steel have created substantial bottlenecks for downstream industries which are dependent on imported special steels and non-standard dimensions.

8.1.4. Globally quality compliance is managed through voluntary or contractual standards, while statutory regulation focuses on safety-critical construction products. However, the QCO order of Ministry of Steel has mandated factory-level certification for broad raw-material categories. More details of product certification requirement across steel categories are included in Annexure-2. Consolidated table on regulatory comparison across select countries is given in the following table.

Regulatory Comparison among India, EU, US and Japan

Aspect	India	European Union	United States	Japan
Certification Requirement	Mandatory BIS certification at factory + grade level for most steel categories	No compulsory certification for generic steel; voluntary EN standards; CE-mark applies only to end- use construction products	No mandatory certification: ASTM standards followed contractually between buyer and supplier	Voluntary JIS standards; compulsory checks only for specific safety- critical end- uses
Scope of Cover- age	Applies to both raw and finished steel products (flat, long, alloy, stainless)	Limited to finished construction and pressure-vessel products	Limited to building and pressure applications regulated by state codes	Limited to construction and industrial safety equipment
Import Requirement	Imports allowed only from BIS- licensed mills; non-BIS im- ports require prior NOC under SIMS	No pre-approval required; conformity handled at buyer level	No pre- approval required	No pre- approval required
Implementation Approach	Factory audits by BIS; annual licence renewal	Self-declaration / third-party testing	Contractual testing by accredited labs	Factory certification optional under voluntary scheme
Policy Intent	Protection and standardisation	Market-based conformity	Market-based conformity	Market-based conformity

Source: MoS QCO notifications (2020-24); EU Reg. 305/2011 (CPR); US ASTM Standards; Japan METI JIS Database.

8.1.5. Across product categories, Indian steel prices remain 15-30 per cent above Chinese levels, largely due to input-duty structures and QCO-linked sourcing rigidity. For manufacturers, particularly MSMEs and exporters, these differentials translate directly into reduced cost competitiveness.

- 8.1.6. HLC noted that while work on review of QCOs was underway the Ministry of Steel has issued an order dated 6th October 2025, exempting 16 products from the mandatory compliance requirements of Quality Control Orders (QCOs) for a period of six months for specified quantity. This exemption applies to imports of steel products with a bill of lading having a shipped-on-board date on or before 31st October 2025. The exempted items primarily comprise raw materials and intermediate products such as steel tubes, drums, stainless steel pipes, and other industrial inputs critical to sectors like construction, oil and gas, and packaging. It is important to note that the exemption applies to only 16 products and is valid for a period of six months, thereby not fully removing uncertainty for businesses.
- 8.1.7. Committee examined all the products covered under QCO on steel sector to finalise its recommendations. As regards QCO on construction steel, pressure vessels and pipes, it was noted that these products are regulated in most of the economies due to safety and quality concerns. After due deliberations, it was felt that QCOs on these products need to be retained in the larger public health and safety interest. Remaining of the products covered under QCO were recommended to be suspended, as detailed in the following paragraph.

8.2. RECOMMENDATIONS

- 8.2.1. Retain QCOs on products pertaining to construction, pressure-vessel, and pipe categories.
- 8.2.2. Suspend implementation of QCOs in following Steel product categories (See Appendix):
 - (i) Engineered Products (68 products)
 - (ii) Auto/Durables/Aircraft (16 products)
 - (iii) Electrical Grade (12 products)
 - (iv) Wires and Ropes (6 products)
 - (v) Alloy Steel (6 products)
 - (vi) Components used in domestic manufacturing of consumer End Products (4 products)
- 8.2.3. Subsequently, if the Ministry of Steel deems it necessary, it may, after examination of the suspended QCOs, refer specific product categories to Inter Ministerial Group (IMG) for review and reconsideration.

8.3. JUSTIFICATION

- **8.3.1. Health / Safety Risk:** Apart from construction and pressure-vessel applications, steel in its raw or semi-finished form does not pose a direct safety hazard. Finished goods that determine end-use safety, such as building structures or pipelines, are already governed by separate product standards. Mandatory certification for feedstock steel adds limited incremental value for public safety.
- **8.3.2. Downstream Impact:** Extensive QCO coverage has raised input prices and created supply-chain rigidities for auto, engineering, and appliance

- manufacturers. Imports of specific grades now face multi-month approval delays, increasing costs by 5–15 percent. Smaller firms find it difficult to access certified suppliers or secure NOCs under the current system, leading to production downtime and loss of export orders.
- **8.3.3. Domestic Capacity:** While India's overall steel capacity exceeds 160 million tonnes, production is concentrated in commodity grades. High-grade flat steels, tool steels, and electrical steels remain import dependent. Domestic mills are only now investing in these segments, with many projects expected to come on stream after FY 2028. Until then, restricting imports through QCOs constrains downstream growth rather than strengthening domestic production.
- **8.3.4. Global Benchmarking:** No major economy, including the EU, US, or Japan mandates factory-level certification for general steel products. Quality control is ensured through voluntary standards (ASTM, EN, JIS) and contractual testing for specific end uses. Mandatory certification is confined to limited categories such as construction-grade steel and pressure vessels.
- 8.3.5. PLI Products: PLI scheme has been introduced in specialty steel in 5 categories namely Coated/plated steel products, High strength/wear resistant steel, Specialty rails, Alloy steel products and steel wires, and Electrical steel, covering 25 products. Eligibility of the PLI is determined on the basis of product application matching with one of the five PLI categories. PLI products are not directly synced with QCO product lines. As regards implementation of the PLI scheme in the sector, the same is largely in the investment/implementation stage only and commercial production is largely yet to commence. QCOs can protect these investors from global competition and incentivize them to fast track their investment plans. However, the PLI categories are also the ones where India is most import dependent and hence QCOs are causing distress. To take a balanced view, it would be prudent to not prematurely stop imports through QCOs but take a position once production starts in these grades to see if tariff or non-tariff protection is needed before the PLI beneficiary company reaches required scale in the grade.
- **8.3.6.** Steel is a critical input across the diverse industries used both as raw material and intermediate for finished as well as semi-finished products such as construction, automotive, manufacturing, infrastructure, defence, energy, consumer goods, etc. Looking into its wide range of uses and implications on the overall manufacturing sector a nuanced approach has been adopted for QCOs on steel. Accordingly, it is felt that these identified QCOs should be suspended and thereafter examined by the Ministry of Steel, and, if necessary reference may be made to IMG for review.

8.4. IMPLEMENTATION ROADMAP AND TIMELINE

8.4.1. Suspend implementation of QCOs as per Appendix

8.4.2. Action: Ministry of Steel

8.4.3. Timeline: November 15, 2025

Reform 5: Revoke Steel Import Monitoring System and the NOC process for import of non-QCO grades of steel

9.1. BACKGROUND

- 9.1.1. The Steel Import Monitoring System (SIMS) was instituted in September 2019 to provide the government and stakeholders with advance information on steel imports to help respond to market conditions and prevent dumping. It also aimed to ensure compliance with Indian quality standards for imported steel.
- 9.1.2. Importers are required to submit advance information about their imports on SIMS to obtain a registration number normally between 7 and 60 days before the expected arrival of the consignment. The registration number and expiry date must be entered on the Bill of Entry for customs clearance. The information submitted is monitored by the Ministry of Steel.
- 9.1.3. In 2023, the Ministry of Steel introduced a new requirement mandating a No-Objection Certificate (NOC) for the import of non-BIS-certified steel. Under this framework, importers are required to apply to a Technical Committee (TC) comprising officials from the Bureau of Indian Standards (BIS) and the Ministry of Steel. The Committee examines each case on a consignment-by-consignment basis, and importers can clear their goods at customs only after receiving TC approval.
- 9.1.4. This mechanism aimed to prevent misuse of Quality Control Order (QCO), exemptions ensured that only quality-assured steel entered India. However, the shift from a self-declaration system to a pre-clearance regime has substantially increased administrative burden and disrupted supply chains across the engineering, automotive, and consumer-durable sectors.
- 9.1.5. Many specialized steel grades have no BIS-equivalent standards, yet importers are required to seek fresh NOCs for every shipment—resulting in repeated delays, uncertainty, and stock-outs. Moreover, the NOCs issued often cover quantities lower than requested, and the approvals are frequently delayed, adding further unpredictability to supply planning.

9.2. RECOMMENDATIONS

- 9.2.1. Revoke Steel Import Monitoring System (SIMS)
- 9.2.2. Revoke NOC requirement for imports of non-BIS steel grades

9.3. JUSTIFICATION

9.3.1. Duplication of the monitoring role of DGFT : Monitoring import and export data at the tariff-line level falls under the purview of the Directorate

- General of Foreign Trade (DGFT). Ministries can seek information from DGFT whenever required. Imposing an additional monitoring system that demands prior registration and data submission duplicates DGFT's functions and risks turning the mechanism into an import-licensing tool rather than a monitoring exercise.
- **9.3.2. Procedural Delays and Uncertainty in the NOC Process:** The Technical Committee NOC approvals often take four to six weeks, causing shipment delays, higher demurrage costs, and increased working capital pressures. Many applications remain pending indefinitely without formal communication or rejection, creating uncertainty for importers.
- 9.3.3. Mismatch between BIS Standards and Industry Requirements: Several high-performance materials—such as high-tensile automotive sheets, electrical steels, and specialty alloys—do not have corresponding BIS standards. Requiring NOCs for these grades effectively halts the import of essential industrial inputs, impacting downstream production and competitiveness.
- **9.3.4. Reduced Predictability for MSMEs:** Micro, small, and medium enterprises (MSMEs) relying on just-in-time imports face hardship. The requirement for repetitive NOCs for recurring orders increases transaction costs, complicates production planning, and discourages smaller firms from participating in trade.

9.4. IMPLEMENTATION ROADMAP AND TIMELINE

- 9.4.1. Notification No.17/2015-2020 dated September 5, 2019 on Steel Import Monitoring System should be revoked.
- 9.4.2. Requirement of NOC for import of non-BIS steel mandated vide F. No. S-20011/14/2021-TECH dated October 20, 2023 should be revoked.

9.4.3. Action: Ministry of Steel, DGFT

9.4.4. Timeline: November 15, 2025

Reform 6: Revoke QCOs in Footwear and Electronics Components

10.1. BACKGROUND

- 10.1.1. Footwear and electronics industries are two of India's most dynamic, employment-intensive, and export-intensive manufacturing sectors. Footwear employs over 4.5 million people across clusters such as Agra, Kanpur, Ambur, Ranipet, and other places. On the other hand, electronics anchored around Noida, Chennai, and Bengaluru has seen rapid growth mainly due to the PLI scheme and global value-chain diversification..
- 10.1.2. Both sectors depend on imported intermediate materials that determine end-product performance and design flexibility. The QCOs on intermediate products critical for these sectors have disrupted access to that are either not produced in India or are manufactured by very few suppliers.
- 10.1.3. Some of the key issues identified are as under:
 - (iv) Supply bottlenecks have emerged as some foreign manufacturers' are reluctant to pursue BIS licensing for relatively small order volumes from India.
 - (v) Rising input costs and erosion of India's cost advantage vis-à-vis competitors have contributed to a decline in India's footwear export share which has fallen post-2021 amid tariffs and QCOs.
 - (vi) There is an uneven policy treatment between SEZ-based exporters, who are exempt, and DTA units that cater to both domestic and international markets.

10.2. RECOMMENDATION

- 10.2.1. Revoke following QCOs on Footwear and Electronic Components:
 - (i) Footwear components (PU, PVS, Rubber, etc.)
 - (ii) Copper wires for general engineering
 - (iii) Flux Cored Solder Wire
 - (iv) Wrought aluminium and alloys
 - (v) Pressure Sensitive Adhesive Tapes

10.3. JUSTIFICATION

10.3.1. Health / Safety Risk: The regulated materials are industrial intermediates. Their non-conformity does not directly endanger consumer health or safety.

- Further, finished footwear and electronics products already undergo safety and performance testing (ISI/IEC/CE/UL standards).
- **10.3.2. Downstream Impact:** The QCOs have sharply reduced the number of eligible suppliers e.g., TPU suppliers dropped from 21 to 5 globally as firms declined BIS audits process citing concerns regarding trade-secret. Electronics assemblers report that QCOs on flux-cored solder wire and ABS have raised raw-material costs by 8-10 % and lengthened lead times by several weeks. MSMEs that cannot import directly suffer cascading cost increases.
- **10.3.3. Domestic Capacity:** Local capacity for advanced polymers and speciality electronic materials remains limited. India currently has negligible production of flux-cored solder wire. Accredited testing facilities for footwear components are also insufficient, leading to long queues and high testing fees.
- **10.3.4.Global Benchmarking:** No major footwear or electronics-manufacturing nation imposes mandatory certification for these intermediate materials. China, Vietnam, and Malaysia maintain voluntary standards, while quality control is exercised through buyer audits and end-product regulations.

10.4. IMPLEMENTATION ROADMAP AND TIMELINE

- 10.4.1. Revoke QCOs on following Footwear and Electronic Components:
 - (i) Footwear components (e.g.PU, PVS, Rubber etc.)
 - (ii) Copper wires for general engineering
 - (iii) Flux Cored Solder Wire
 - (iv) Wrought aluminium and alloys
 - (v) Pressure Sensitive Adhesive Tapes

10.4.2. Action: DPIIT

10.4.3. Timeline: November 15, 2025

Reform 7: Defer implementation and refer to IMG for review of all upcoming QCOs in RM, Intermediate Goods and Capital Goods

11.1. BACKGROUND

11.1.1. As of October 2025, over 79 new QCOs, including one Omnibus Technical Regulation (OTR) are under implementation across multiple line ministries/departments, including D/o Chemicals & Fertilisers, DPIIT, M/o Mines, M/o Textiles, MEITY, and M/o Heavy Industries, covering a wide range of raw materials, intermediate goods, and capital equipment. Details are given as under:

Sector / Category	No. of QCOs	Representative Products	Primary Ministry / Department
Chemicals & Petrochemicals	22	Styrene, Acrylonitrile, Maleic Anhydride, Lauric Acid, Fatty Acids (palm, rice bran, coconut), Toluene, p-Xylene, H-Acid, K-Acid, Vinyl Sulphone, Pyridine, Beta Picoline, Sodium Tripolyphosphate, Ethyl Acrylate, Methyl Acrylate, Vinyl Acetate Monomer	Department of Chemicals and Petrochemicals
Machinery, Engineering & Industrial Equipment	16	Pumps, compressors, cranes, centrifuges, machine tools, construction machinery, transformers, converters, machines for metal cutting, etc.	Ministry of Heavy Industries
Tools, Fasteners & Hardware	14	Multiple different types of screws	Department for Promotion of Industry and Internal Trade (DPIIT)
Electrical & Electronic Equipment	6	Low-voltage switchgear and controlgear (IS/IEC 60947 series), household electrical appliances (IS 302 series), digital television receivers	Ministry of Heavy Industries; Ministry of Electronics and Information Technology (MeitY); DPIIT
Plastics & Polymers	7	Ethylene Vinyl Acetate (EVA), Polypropylene (PP), Polyvinyl Chloride (PVC), Polyurethane (PU), Polycarbonate, HDPE materials	Department of Chemicals and Petrochemicals
Base Metals & Non-Ferrous Alloys	7	Refined nickel, zinc; Primary lead, Pure nickel, pure zinc, tin ingot	Department for Promotion of Industry and Internal Trade (DPIIT); Ministry of Mines
Furniture & Fittings	6	Work chairs, general-purpose chairs, tables, desks, beds, bunk beds, storage units	Department for Promotion of Industry and Internal Trade (DPIIT)
Synthetic Fibres, Yarns & Textiles	1	Cotton bales	Ministry of Textiles
Total	79	_	-

(Position of upcoming QCOs/OTR, as on October 15, 2025- Source: BIS)

- 11.1.2. The Machinery and Electrical Equipment Safety (Omnibus Technical Regulation) Order, 2024 is a Quality Control Order (QCO) that requires products listed under specific Harmonized System (HS) codes to obtain Bureau of Indian Standards (BIS) certification before they can be manufactured, imported, or sold in India. The initial enforcement date of August 28, 2025, has been extended to September 1, 2026
- 11.1.3. The details given on upcoming QCOs in Table-1 of Appendix include additional petrochemical resins, specialty steel grades, engineering alloys, electrical machinery components, rubber and polymer blends, wood-based boards, and metallic fasteners. Many of the upcoming products mirror categories that have already faced serious implementation challenges under earlier QCOs, such as polymers (EVA, TPU), specialty steels (CRGO, stainless), and engineered materials (copper strips, flux-cored wire).
- 11.1.4. If implemented without adequate capacity and due examination, the upcoming QCOs could compound the existing compliance burden on

manufacturers and MSMEs and slow investment across sectors that depend on imported intermediaries.

11.2.RECOMMENDATION

11.2.1. Defer the implementation of upcoming QCOs and OTR covering raw materials, intermediate goods, and capital equipment and refer to IMG for review.

11.3.JUSTIFICATION

- **11.3.1. Over-extension of scope:** Several draft QCOs apply to generic industrial inputs that have no direct consumer-safety interface—contrary to international practice.
- **11.3.2. Infrastructure readiness:** Testing and certification capacity remains limited. BIS and accredited labs are already stretched by existing QCOs, and new mandates risk long backlogs.
- **11.3.3. Trade and competitiveness impact:** Many of the new QCOs are on capital goods which will limit access of Indian companies to competitively priced capital equipment, further eroding their competitiveness in the global markets

11.4. IMPLEMENTATION ROADMAP AND TIMELINE

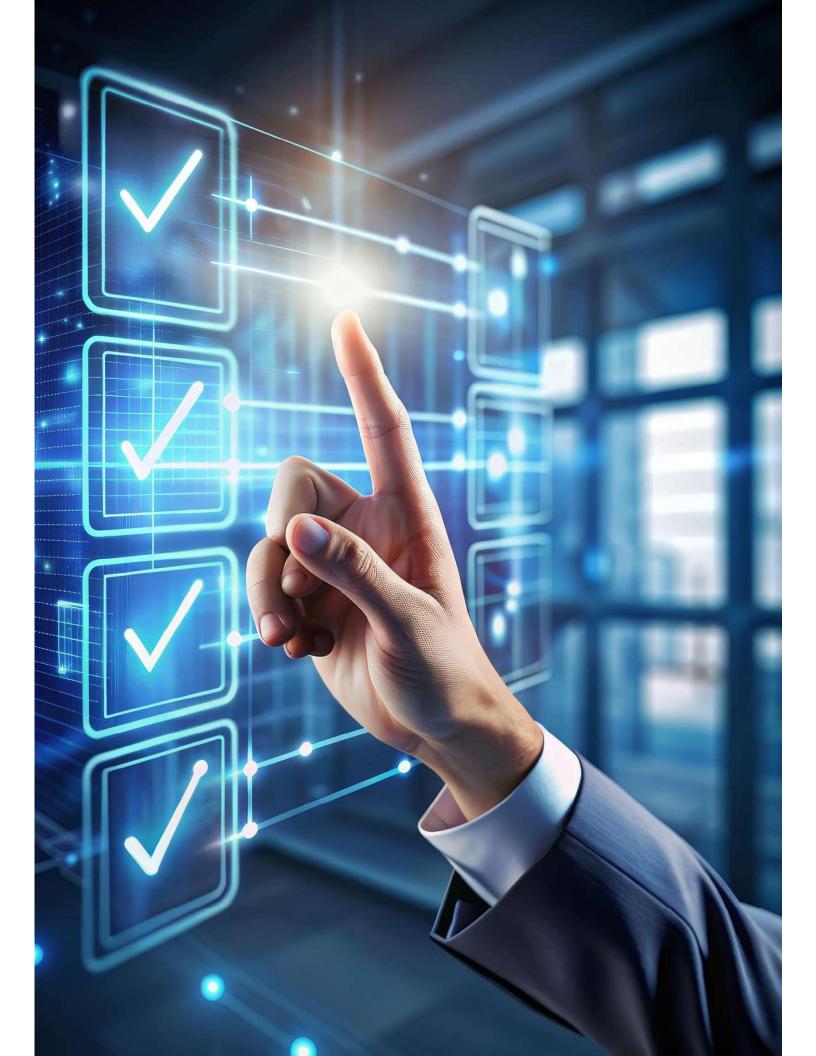
- 11.4.1. Issuance of order to defer the implementation of upcoming QCOs/OTR covering raw materials, intermediate goods, and capital equipment and reference to IMG for review
- 11.4.2. Action: DCPC, DPIIT, Ministry of Heavy Industries, MEITY, Ministry of Mines, Ministry of Textiles
- 11.4.3. Timeline: November 15, 2025

CHAPTER 6 SUMMARY OF RECOMMENDATIONS

Reform	Recommendations	Implementation Process	
	Revoke following QCOs on synthetic fibres and yarns and their inputs -	Revocation of QCOs	
	i) Purified Terephthalic Acid (PTA)	on the 8 mentioned synthetic fibres, yarns and their inputs	
	ii) Mono-Ethylene Glycol (MEG)		
1) 000	iii) 100% Polyester Spun Yarn (PSY)	Timeline: November 15,	
1) QCOs on synthetic fibres,	iv) Polyester Industrial Yarn (IDY)	2025	
yarns and inputs	v) Polyester Staple Fibres (PSF)	Action: Department	
	vi) Polyester Filament Fully Drawn Yarn (FDY)	of Chemicals & Petrochemicals and	
	vii) Polyester Partially Oriented Yarn (POY)	Ministry of Textiles	
	viii) Viscose Staple Fibre (VSF)		
	Revoke following QCOs on Plastics and Polymers -	Revocation of QCOs on the 7 mentioned	
	i) Polyethylene (LDPE/LLDPE/HDPE)	plastics and polymers	
2. QCOs on plastics and polymers	ii) ABS (Acrylonitrile- Butadiene- Styrene)	(including 5 upcoming QCOs)	
	iii) Polypropylene (PP)	Timeline: November 15, 2025	
	iv) Polyvinyl Chloride (PVC)		
	v) EVA (Ethylene Vinyl Acetate)	Action: Department	
	vi) Polyurethanes	of Chemicals &	
	vii)Polycarbonate	Petrochemicals	

	T	
3. QCOs on base metals	Revoke following QCOs on base metals - i) Copper ii) Aluminum & Alloys iii) Nickel Powder iv) Zinc v) Lead vi) Tin vii)Refined Nickel	Revocation of QCOs on the 7 mentioned base metals. (including 5 upcoming QCOs) Timeline: November 15, 2025 Action: Ministry of Mines
a)Retain QCOs on products pertaining to construction, pressure-vessel, and pip categories b)Suspend implementation of the following QCOs on steel - i) Engineered Products (68 products) 4. QCOs on steel product (16 products) iii) Auto/Durables/Aircraft (16 products) iii) Electrical Grade (12 products) iv) Wires and Ropes (6 products) v) Alloy Steel (6 products) vi) Consumer End Products (4 products) c) Post suspension, examination by the Ministry of Steel and reference to Inte Ministerial Group (IMG) for review, if necessary		Suspend implementation of QCOs in all Steel product categories (as per Appendix) except for construction and pressure vessels and pipes categories Timeline: November 15, 2025 Action: Ministry of Steel

5. Revoke Steel Import Monitoring System and the NOC process for import of non- QCO grades of steel	a)Revoke Steel Import Monitoring System (SIMS) b)Revoke NOC requirement for imports of non-BIS steel grades	2020 dated September 5, 2019 on Steel Import Monitoring System should be revoked Requirement of NOC for import of non-BIS steel mandated vide F. No. S-20011/14/2021-TECH dated October 20, 2023 should be revoked Timeline: November 15, 2025 Action: Ministry of Steel, DGFT	
6. QCOs on Footwear and Electronics Components	Revoke following QCOs on Footwear and Electronic Components product categories except construction category- i) Footwear components (PU, PVS, Rubber, etc. ii) Copper wires for general engineering iii) Flux Cored Solder Wire iv) Wrought aluminium and alloys v) Pressure Sensitive Adhesive Tapes	Revocation of QCOs on the 5 mentioned footwear and electronics components. Timeline: November 15, 2025 Action: DPIIT	
7. Implementation and refer to IMG for review of all upcoming QCOs/OTR in RM, Intermediate Goods and Capital Goods	Defer the implementation of upcoming QCOs covering raw materials, intermediate goods, and capital equipment and refer to IMG for review.	Revocation of upcoming QCOs/OTR on RM, Intermediate Goods and Capital Goods. Timeline: November 15, 2025 Action: DCPC, DPIIT, Ministry of Heavy Industries, MEITY, Ministry of Mines, Ministry of Textiles	



APPENDIX

Engineered Products

S. No.	Product Description as per QCO Notification
1	Cold-rolled Steel Strips For Springs
2	Alloy Steel billets, blooms and slabs for forging for general engineering purposes
3	Carbon manganese steel forgings for pressure vessels
4	Carbon steel billets, blooms, slabs and bars for forgings
5	Carbon Steel Cast Billet Ingots, Billets, Blooms, and Slabs for Rerolling purposes - Specification
6	Carbon Steel Wire for the Manufacture of Wood Screws
7	Cold rolled medium, high carbon, and low alloy steel strip for general engineering purposes
8	Cold Rolled Steel Strips (Box Strappings)
9	Half Round Mild Steel Wire For The Manufacture of Split Pins
10	Hard Drawn Steel Wire For Upholstery Springs
11	Heald Wire
12	High carbon steel wire rods
13	Hot Rolled Carbon Steel Sheet, Plate and Strip - Specification
14	Hot Rolled Carbon Steel Strip for Cold Rolling Purposes
15	Hot Rolled Steel Sheet, Plate and Strip for Forming and Flanging Purposes
16	Low Carbon Steel Wire for Rivets for use in Bearing Industry
17	Mild steel for metal arc welding electrodes
18	Mild Steel Rivet Bars For Ship Building
19	Mild steel wire for cotter pins
20	Mild steel wire for General Engineering purposes
21	Mild steel wire rods for general engineering purposes
22	Stainless Steel Blooms, Billets, and Slabs for Forgings
23	Stainless Steel for welding electrode core wire
24	Steel Cast Billet Ingots, Billets, and Blooms for production of High Carbon Steel Wire Rods - Specification
25	Steel Chequered Plates
26	Steel For Spring Washers
27	Steel for the manufacture of laminated springs (railway rolling stock) Part 1 Flat Sections - Specification
28	Steel for the manufacture of laminated springs (railway rolling stock) Part 2: Rib and Groove Sections - Specification
29	Steel For The Manufacture of Volute And Helical Springs (for Railway Rolling Stock)
30	Steel ingots, billets, and blooms for the production of springs, rivets, and screws for general engineering applications - Specification

S. No.	Product Description as per QCO Notification
71	Steel ingots, blooms, and billets for production of mild steel wire rods for general
31	engineering purposes - Specification
32	Steel Wire (Up to 20 mm) for the manufacture of cold-forged rivets
33	Steel Wire for Needles
34	Steel Wire For Nipples For Spokes
35	Steel Wire For Reeds
36	Steel Wire for Spokes
37	Steel Wire for Staples, Pins, and Clips
38	Steel Wire for Umbrella Ribs
39	Steels for Pneumatic Tools
40	Trapezoidal Steel Wire for Springs Washers
41	18 Percent Nickel Maraging Steel Bars and Rods
42	Bead Wires for Tyres
43	Hot Rolled bars for production of bright bars and machined parts for engineering applications
44	Quenched And Tempered Alloy Steel Forgings For Pressure Vessels
45	Carbon And Low Alloy Billets, Blooms, Slabs And Bars For Manufacture Of Shell
43	Bodies And Proof Shots Used In Defence Services
46	Case Hardening Steels
47	Chrome molybdenum steel bars and rods for aircraft purposes
48	Cold-rolled Carbon Steel Strips for Ball and Roller Bearing Cages/Retainers - Specification
49	Flame And Induction Hardening Steels
50	Heat Resisting Steels
51	Heat-Treated Steels Alloy and Free-Cutting Steels - Ball and Roller Bearing Steels
52	Mild Steel Wire Rod for the Manufacture of Machine Screws (By Cold Heading Process)
53	Mild Steel Wire, Cold Heading Quality
54	Stainless Steel Bars and Flats
55	Stainless Steel Plate, Sheet and Strip
56	Stainless Steel wire Rod
57	Stainless Steel Wires
58	Steel for hardening and tempering
59	Steel wire for mechanical springs Part-1 cold drawn unalloyed steel wire
60	Steel wire for mechanical springs Part-2 oil hardened and tempered steel wire
61	Steel Wires for Mechanical Springs- Part 4: Stainless Steel Wire
62	Steels for Cold Heading/Cold extrusion application Part-1 Wrought carbon and low alloy steels
63	Steels for cold heading/cold extrusion applications - Specification Part 2 - Stainless Steel
64	Steels For Die Blocks For Drop Forging
65	Steels for High Temperature Bolting Applications - Specification
66	Stock for Forgings produced from Continuously Cast Blooms, Billets and Slabs
67	Tool and die steels
68	Tool Steel Forgings For Metal Forming

Auto/Durables/Aircrafts

S. No.	Product Description as per QCO Notification
1	Cold reduced carbon steel sheets and strips Part 1 Cold Forming and Drawing Purpose
2	Cold-Reduced and Hot-Rolled Carbon Steel Sheet For Porcelain Enamelling
3	Continuously pre-painted galvanized steel sheets and coils
4	Ferrochromium
5	Galvanized steel sheets (plain and corrugated)
6	Hot Dip aluminium-Zinc alloy metallic coated steel strip and sheet (Plain)
7	Hot-rolled mild steel sheet and strip in coil form for cold-reduced tinplate and cold-reduced black plate
8	Low Carbon Galvanized steel wires formed wires and Tapes for armouring of Cables
9	Pre-painted aluminium zinc alloy metallic coated steel strip and sheet (Plain)
10	Steel for the manufacture of volute, helical and laminated springs for automotive suspension
11	Carbon-chromium Steel for the Manufacture of Balls, Rollers, and Bearing Races - Specification
12	Cold reduced carbon steel sheets and strips Part 2 High Tensile and Multi-phase Steel
13	Cold-reduced Electrolytic Chromium/Chromium oxide - coated steel
14	Cold-reduced Electrolytic Tin Plate
15	Electrogalvanized Hot Rolled and Cold Reduced Carbon Steel Sheets and Strips
16	Hot-Dip Zinc - Aluminium - Magnesium Alloy Coated Steel Sheets, Plates and Strips

Electrical Grade

_			
S. No.	Product Description as per QCO Notification		
1	Hot Rolled and Cold Rolled Steel Strips Intended For Processing Of Semi/Fully Processed Non Grain Oriented Electrical Steel Or Fully Processed Grain Oriented Electrical Steel		
2	Non-Magnetic Stainless Steel for electrical applications Part 2 - Specific requirements for binding wire		
3	Non-Magnetic Stainless Steel for electrical applications Part 3 - Specific requirements for sheets, strips, and plates		
4	Steel Wire For Banding Of Armatures And Rotors Part II Specific Requirements for magnetic banding wires		
5	Tinned Steel Wire For Banding Of Armatures And Rotors Part III Specific Requirements for non-magnetic banding wires		
6	Alloys Used In Electrical Resistance Metallic Heating Elements		
7	Magnetic materials - Specification for individual material		
8	Oriented Electrical Steel Sheet and Strip - Semi-Processed		
9	Cold rolled non-oriented electrical steel sheets and strips- fully processed type (CRNO)		
10	Grain oriented electrical steel sheet & strip (CRGO)		
11	Soft Magnetic Iron Rods, Bars Flats and Sections		
12	Soft Magnetic Iron Strips		

Wires & Ropes

S. No.	Product Description as per QCO Notification	
1	Steel Wire Rope for haulage	
2	Round Steel Wire for ropes	
3	Steel Wire Ropes for General Engineering Purposes	
4	Steel Wire Suspension Ropes for Lifts, Elevators and Hoists	
5	Stranded steel wire ropes for winding and man-riding haulages in mines	
6	Wire Ropes Used in Oil Wells and Oil Well Drilling	

Alloy Steel

S. No.	Product Description as per QCO Notification	
1	Ferromanganese	
2	Silicomanganese	
3	Ferro Vanadium	
4	Ferromolybdenum	
5	Ferronickel	
6	Ferrosilicon	

Components used in domestic manufacturing of Consumer End Products

S. No.	Product Description as per QCO Notification
1	Cold-Rolled Stainless Steel Strips for Razor Blades
2	Cold rolled steel strips for carbon steel razor blades
Z	Low Nickel Austenitic Stainless Steel Sheet and Strip For Utensils and Kitchen
3	Applications
4	Stainless Steel sheets and strips for utensils

Table 1: Upcoming QCOs

Sector/Category	Ministry/ Department	Product	Indian Standard	Date of Enforcement
Base Metals & Non- Ferrous Alloys	Ministry of Mines	Refined Nickel	IS 2782:2023	17 Oct 2025
Base Metals & Non- Ferrous Alloys	Ministry of Mines	Primary Lead	IS 27:2023	17 Oct 2025
Base Metals & Non- Ferrous Alloys	Ministry of Mines	Refined Zinc	IS 209:2024	17 Oct 2025
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Styrene (Vinyl Benzene)	IS 4105:2020	24 Oct 2025
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Acrylonitrile	IS 12540:1988	24 Oct 2025
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Maleic anhydride, technical	IS 5149:2020	24 Oct 2025

Sector/Category	Ministry/ Department	Product	Indian Standard	Date of Enforcement
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Lauric Acid	IS 10931:1984	24 Oct 2025
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Acid Oil	IS 12029:1986	24 Oct 2025
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Palm Fatty Acid	IS 12067:1987	24 Oct 2025
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Rice Bran Fatty Acid	IS 12068:1987	24 Oct 2025
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Coconut Fatty Acid	IS 12069:1987	24 Oct 2025
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Hydrogenated Rice Bran Fatty Acid	IS 12361:1988	24 Oct 2025
Plastics & Polymers	Department of Chemicals and Petrochemicals	Polypropylene (PP) materials for moulding and extrusion	IS 10951:2020	24 Oct 2025
Electrical & Electronic Equipment	Ministry of Electronics and Information Technology	Digital television receivers for satellite broadcast transmission	IS 18112:2022	26 Oct 2025
Tools, Fasteners & Hardware	DPIIT	Fasteners - Cross recessed drilling screws with tapping screw thread: Part 1 Pan head	IS 18471 (Part 1): 2023 / ISO 15481:1999 (Revised as 18471:2025)	01 Nov 2025
Tools, Fasteners & Hardware	DPIIT	Fasteners - Cross recessed drilling screws with tapping screw thread: Part 2 Countersunk head	IS 18471 (Part 2): 2023 / ISO 15482:1999 (Revised as 18471:2025)	01 Nov 2025
Tools, Fasteners & Hardware	DPIIT	Fasteners - Cross recessed drilling screws with tapping screw thread: Part 3 Raised countersunk head	IS 18471 (Part 3): 2023 / ISO 15483:1999 (Revised as 18471:2025)	01 Nov 2025
Tools, Fasteners & Hardware	DPIIT	Fasteners - Hexagon washer head drilling screws with tapping screw thread	IS 18476: 2023 / ISO 15480:2019 (Revised as 18471:2025)	01 Nov 2025
Tools, Fasteners & Hardware	DPIIT	Cross-recessed tapping screws: Part 1 Pan head	IS 18480 (Part 1):2023 / ISO 7049:2011	01 Nov 2025
Tools, Fasteners & Hardware	DPIIT	Cross-recessed tapping screws: Part 2 Countersunk flat head	IS 18480 (Part 2):2023 / ISO 7050:2011	01 Nov 2025

Sector/Category	Ministry/ Department	Product	Indian Standard	Date of Enforcement
Tools, Fasteners & Hardware	DPIIT	Cross-recessed tapping screws: Part 3 Raised countersunk oval head	IS 18480 (Part 3):2023 / ISO 7051:2011	01 Nov 2025
Tools, Fasteners & Hardware	DPIIT	Pan head screws with Type H or Type Z cross recess – Product grade A	IS 7483:2018 / ISO 7045:2011	01 Nov 2025
Tools, Fasteners & Hardware	DPIIT	Countersunk flat head screws (common head style) with Type H or Type Z cross recess - Product grade A: Part 1 Steel screws property class 4.8	IS 7485 (Part 1):2018 / ISO 7046-1:2011	01 Nov 2025
Tools, Fasteners & Hardware	DPIIT	Countersunk flat head screws (common head style) with Type H or Type Z cross recess – Product grade A: Part 2 Steel screws property class 8.8, stainless steel screws and nonferrous metal screws	IS 7485 (Part 2):2018 / ISO 7046-2:2011	01 Nov 2025
Tools, Fasteners & Hardware	DPIIT	Raised countersunk head screws (common head style) with Type H or Type Z cross recess - Product grade A	IS 7486:2018 / ISO 7047:2011	01 Nov 2025
Tools, Fasteners & Hardware	DPIIT	Drywall screws – Specification	IS 18507:2024	01 Nov 2025
Tools, Fasteners & Hardware	DPIIT	Chipboard screws – Specification	IS 18508:2024	01 Nov 2025
Tools, Fasteners & Hardware	DPIIT	Cross-recessed countersunk head wood screws – Specification	IS 18509:2023	01 Nov 2025
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	p-Xylene	IS 17370:2020	19 Dec 2025
Plastics & Polymers	Department of Chemicals and Petrochemicals	Polyurethane	IS 17397 (Part 1):2020 / ISO 16365-1:2014	19 Dec 2025
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Toluene	IS 537:2011	22 Dec 2025
Plastics & Polymers	Department of Chemicals and Petrochemicals	Polyvinyl Chloride (PVC) Homopolymer	IS 17658:2021	24 Dec 2025
Plastics & Polymers	Department of Chemicals and Petrochemicals	Textiles — High density polyethylene (HDPE)/ Polypropylene (PP) woven sacks for 50 kg cement packaging	IS 11652:2017	06 Jan 2026

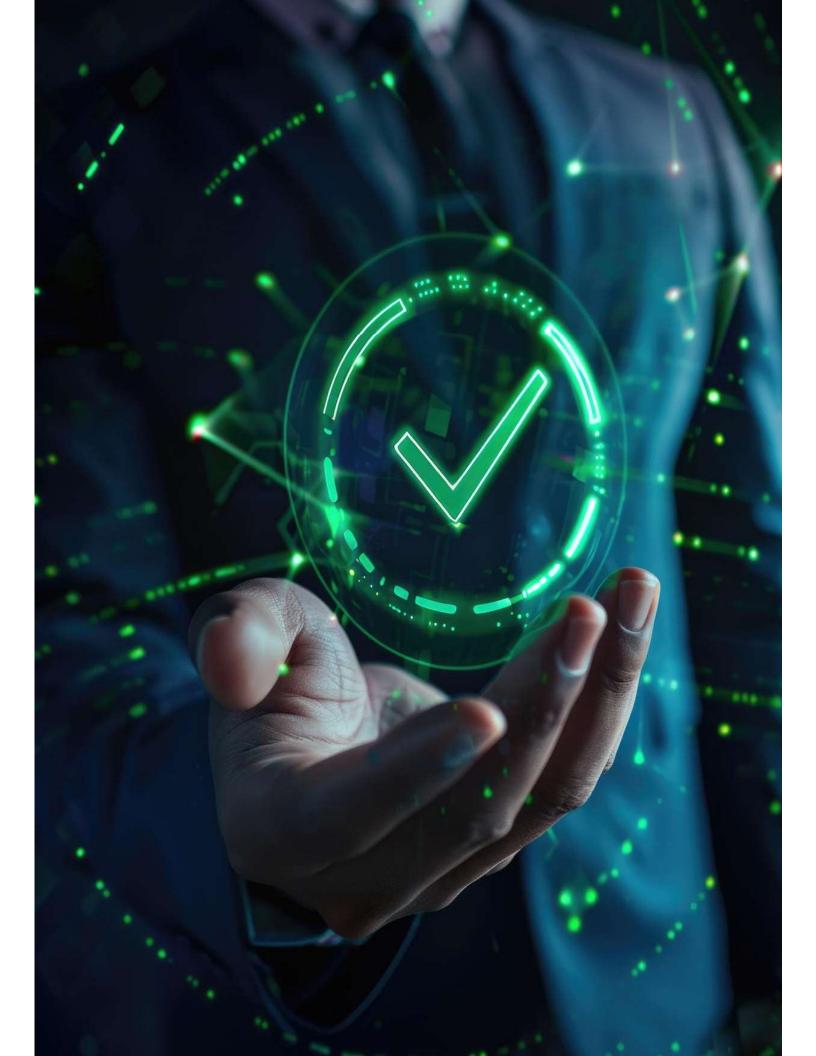
Sector/Category	Ministry/ Department	Product	Indian Standard	Date of Enforcement
Plastics & Polymers	Department of Chemicals and Petrochemicals	Textiles — Polypropylene (PP)/High density polyethylene (HDPE) laminated woven sacks for mail sorting, storage, transportation and distribution	IS 17399:2020	06 Jan 2026
Plastics & Polymers	Department of Chemicals and Petrochemicals	Textiles — Polypropylene (PP) woven, laminated, block bottom valve sacks for 50 kg cement packaging	IS 16709:2017	06 Jan 2026
Furniture & Fittings	DPIIT	Work chairs	IS 17631:2022	14 Feb 2026
Furniture & Fittings	DPIIT	General purpose chairs and stools	IS 17632:2022	14 Feb 2026
Furniture & Fittings	DPIIT	Tables and desks	IS 17633:2022	14 Feb 2026
Furniture & Fittings	DPIIT	Storage units	IS 17634:2022	14 Feb 2026
Furniture & Fittings	DPIIT	Beds	IS 17635:2022	14 Feb 2026
Furniture & Fittings	DPIIT	Bunk beds	IS 17636:2022	14 Feb 2026
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Beta Picoline	IS 16112:2013	13 Mar 2026
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Sodium tripolyphosphate, anhydrous, technical	IS 6100:1984	13 Mar 2026
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Pyridine	IS 8058:2018	13 Mar 2026
Electrical & Electronic Equipment	DPIIT	All electrical appliances intended for household, commercial or similar use, with rated voltage not exceeding 250 V for single-phase appliances and 480 V for other appliances, including those for direct current supply and battery-operated appliances. (Illustrative list of appliance types in 'Notes')	IS 302 (Part 1): 2024 / IEC 60335-1:2020	19 Mar 2026
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Ethyl acrylate	IS 14708:1999	31 Mar 2026
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Vinyl acetate monomer	IS 12345:1988	31 Mar 2026
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Methyl acrylate	IS 14707:1999	31 Mar 2026
Base Metals & Non- Ferrous Alloys	Ministry of Mines	Tin ingot	IS 26:2024	17 Apr 2026

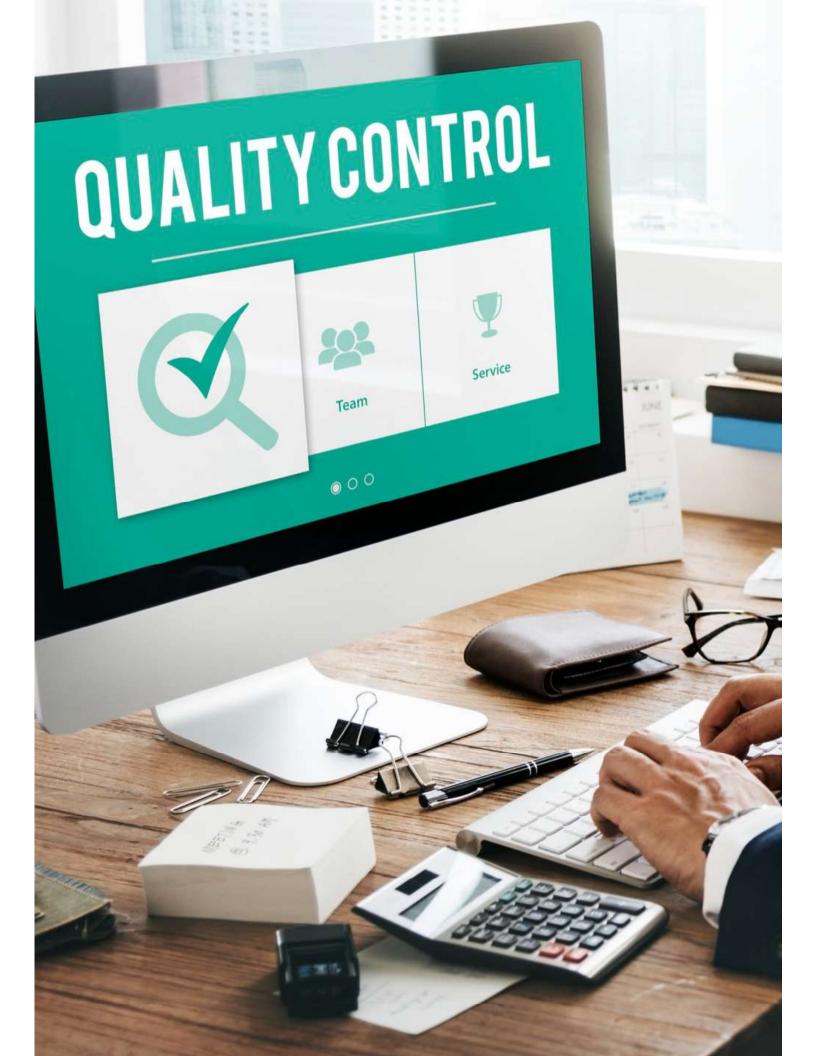
Sector/Category	Ministry/ Department	Product	Indian Standard	Date of Enforcement
Base Metals & Non- Ferrous Alloys	Ministry of Mines	Pure Nickel	IS 2782:2023	17 Apr 2026
Base Metals & Non- Ferrous Alloys	Ministry of Mines	Primary Lead	IS 27:2023	17 Apr 2026
Base Metals & Non- Ferrous Alloys	Ministry of Mines	Pure Zinc	IS 209:2024	17 Apr 2026
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	K-Acid	IS 11557:1986	13 May 2026
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	H-Acid	IS 8637:2020	13 May 2026
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Vinyl Sulphone	IS 18340:2023	13 May 2026
Synthetic Fibres, Yarns & Textiles	Ministry of Textiles	Cotton bales	IS 12171:2019	27 Aug 2026
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of pumps for handling liquids, liquid elevators and their assemblies/sub-assemblies/components	Machinery & Electrical Equipment Safety (Omnibus Technical Regulation) Amendment Order, 2025 – S.O. 2579(E) dated 13 June 2025	01 Sep 2026
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of compressors and/or their assemblies/ sub-assemblies/ components	Omnibus Technical Regulation (as above)	01 Sep 2026
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of machinery that process material through temperature change and/ or their assemblies/sub-assemblies/components	Omnibus Technical Regulation (as above)	01 Sep 2026
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of centrifuges; machinery for filtering or purifying liquids and gases and/or their assemblies/sub-assemblies/ components	Omnibus Technical Regulation (as above)	01 Sep 2026
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of machinery for bottling, closing, sealing, labelling, packing or wrapping and/or their assemblies/sub-assemblies/ components	Omnibus Technical Regulation (as above)	01 Sep 2026

Sector/Category	Ministry/ Department	Product	Indian Standard	Date of Enforcement
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of cranes and/ or their assemblies/sub- assemblies/components	Omnibus Technical Regulation (as above)	01 Sep 2026
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of construction, earthmoving, and mining machinery and/or their assemblies/sub-assemblies/ components	Omnibus Technical Regulation (as above)	01 Sep 2026
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of weaving machines (looms) and/ or their assemblies/sub-assemblies/components	Omnibus Technical Regulation (as above)	01 Sep 2026
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of embroidery machinery and/or their assemblies/sub-assemblies/ components	Omnibus Technical Regulation (as above)	01 Sep 2026
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of metal cutting machine tools, headings 8456 to 8461, and/or their assemblies/sub-assemblies/ components	Omnibus Technical Regulation (as above)	01 Sep 2026
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of machine tools for working stone, ceramics, concrete, asbestos cement or similar mineral glass and/ or their assemblies/sub- assemblies/components	Omnibus Technical Regulation (as above)	01 Sep 2026
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of machinery for working rubber and plastics and/or their assemblies/sub-assemblies/ components	Omnibus Technical Regulation (as above)	01 Sep 2026
Electrical & Electronic Equipment	Ministry of Heavy Industries	All types of machines, including public works and building construction machinery and other machinery and mechanical appliances having individual functions, not specified or included elsewhere in Chapter 84, and/or their assemblies/sub-assemblies/components	Omnibus Technical Regulation (as above)	01 Sep 2026

Sector/Category	Ministry/ Department	Product	Indian Standard	Date of Enforcement
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of gears and gearing; toothed wheels; chain sprockets; transmission elements; ball or roller screws; gear boxes and speed changers, including torque converters; and/or their assemblies/sub-assemblies/ components	Omnibus Technical Regulation (as above)	01 Sep 2026
Electrical & Electronic Equipment	Ministry of Heavy Industries	All types of rotating electrical machines such as generators, etc., and/or their assemblies/sub-assemblies/ components	Omnibus Technical Regulation (as above)	01 Sep 2026
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of diesel generator sets and/or their assemblies/sub-assemblies/ components	Omnibus Technical Regulation (as above)	01 Sep 2026
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of transformers and/or their assemblies/ sub-assemblies/ components	Omnibus Technical Regulation (as above)	01 Sep 2026
Machinery, Engineering & Industrial Equipment	Ministry of Heavy Industries	All types of power semiconductor converters and/or their assemblies/ sub-assemblies/ components	Omnibus Technical Regulation (as above)	01 Sep 2026
Electrical & Electronic Equipment	Ministry of Heavy Industries	All types of switchgear and controlgear equipment operating at voltages up to 1000 V and/or their assemblies/sub-assemblies/components	Omnibus Technical Regulation (as above)	01 Sep 2026
Electrical & Electronic Equipment	Ministry of Heavy Industries	All types of switchgear and controlgear equipment operating at voltages above 1000 V and/or their assemblies/sub-assemblies/components	Omnibus Technical Regulation (as above)	01 Sep 2026
Plastics & Polymers	Department of Chemicals and Petrochemicals	Polycarbonate	IS 14434:1998	12 Sep 2026
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Ethylene dichloride	IS 869:2020	12 Sep 2026
Chemicals & Petrochemicals	Department of Chemicals and Petrochemicals	Vinyl chloride monomer	IS 17442:2020	12 Sep 2026

Source: BIS Website





ANNEXURES

List

- 1. Cabinet Secretariat Notification constituting HLC-NFRR Dated 19th August 2025
- 2. Details of Global Benchmarking of Steel Quality Certification Regime

ANNEXURES-1

No.1/31/3/2025-Cab.(IC) GOVERNMENT OF INDIA/ BHARAT SARKAR CABINET SECRETARIAT/ MANTRIMANDAL SACHIVALAYA RASHTRAPATI BHAVAN

New Delhi, the 19th August, 2025

NOTIFICATION

Subject: Constitution of High-Level Committee on Non-Financial Regulatory Reforms -reg.

The Government's commitment to 'Ease of Doing Business' (EoDB) and to ensure that regulations keep up with technological innovations and global policy developments was reiterated by the Finance Minister in her Budget Speech for 2025-26. The Government believes a regulatory framework based on principles and trust will unleash productivity and employment.

- 2. As a follow-up to the National Conference of Chief Secretaries, Cabinet Secretariat set up a Task Force on Compliance Reduction and Deregulation (Committee of Secretaries) and Deregulation Cell vide Cabinet Secretariat's O.M. No. 082/2/1/2020-CA.V (Vol.III) dated 24.01.2025. The focus of the Deregulation Cell is on helping the States in reforming and simplifying regulations and procedures.
- 3. It has now been decided to set up a High-Level Committee on Non-Financial Regulatory Reforms (HLC) for a review of non-financial sector regulations, certifications, licences and permissions, pertaining to the Union Government, to develop a modern, flexible, people-friendly, and trust-based regulatory framework appropriate for the 21st century.
- 4. The Task Force on Compliance Reduction and Deregulation (Committee of Secretaries) and Deregulation Cell referred to in paragraph 2 above will continue to function with the objective of helping States/ Union Territories in reforming and simplifying regulations and procedures, and reducing the regulatory and compliance burden at the State/ Union Territory level.

Terms of Reference of the HLC

- The Terms of Reference of the HLC will be as follows:
 - To improve Ease of Doing Business and Ease of Living across key sectors.
 - b) To reduce the overall compliance burden for citizens and enterprises.

- c) To evaluate the relevance and usefulness of current laws, rules, regulations, certifications and processes related to all economic activities, other than the financial sector, and suggest ways and means to simplify, consolidate and combine them, where the relevance and usefulness exist, to reduce the compliance requirements. For others, elimination may be considered. This exercise should be aligned with the current policies of the Government.
- d) To examine avenues for self-certification and third-party inspections with scope for random inspections for monitoring purposes.
- To suggest simplification of administrative procedures, processes, forms, standards, etc.
- f) In particular, but not limited to, the HLC may focus on the following areas:
 - MSMEs and requirements on them from the Central Government and its agencies in matters of registration, pre-establishment approvals and post establishment operations such as inspections and compliances.
 - ii. Foreign trade (both exports and imports), including but not limited to procedures related to Directorate General of Foreign Trade (DGFT), Directorate General of Trade Remedies (DGTR), Customs, relevant Government agencies and any other body attached to any Ministry in the Union Government, to simplify and eliminate rules, regulations, processes pertaining to various compliances.
 - iii. Examine the current practices and requirements of all certification bodies (e.g., BIS, FSSAI) attached to Union Ministries and propose ways and means to streamline, simplify, and, where appropriate, eliminate certification requirements, proposing alternative approaches.
 - Regulatory and compliance requirements under the Companies Act, 2013.
 - Approvals and compliances under the Environment (Protection) Act, 1986 and Water (Prevention and Control of Pollution) Act, 1974.
 - vi. Registration of entities with all tax authorities direct and indirect.
- g) Make specific recommendations to decriminalise the regulatory and compliance requirements as much as possible.

 Any other matter that the HLC deems relevant, consistent with the mandate and purposes, with prior approval of the Government.

Composition of the HLC

The following will be the composition of the HLC:

i.	Shri Rajiv Gauba, Member, NITI Aayog		Chairperson
ii.	Shri Pawan Goenka, Chairman, Indian National Space	÷	Member
	Promotion and Authorisation Centre (IN-SPACe)		
iii.	Shri Janmejaya Sinha, Boston Consulting Group	17	Member
iv.	Shri Manish Sabharwal, Executive Vice Chairman,		Member
	TeamLease		
v.	Secretary, D/for Promotion of Industry and Internal Trade	10	Member
vi.	Secretary, M/o Micro, Small and Medium Enterprises		Member
vii.	Representative of Confederation of Indian Industry (CII)	-	Member
viii.	Representative of Federation of Indian Chambers of	7	Member
	Commerce and Industry (FICCI)		
ix.	Representative of Associated Chambers of Commerce and	-	Member
	Industry of India (ASSOCHAM)		
X.	Advisor/ Joint Secretary, NITI Aayog	-	Secretary

Duration

The HLC shall complete its work within twelve months from the date of its constitution.

Procedures of the HLC

8. The HLC shall draw up its internal working procedure. It shall consult stakeholders, Central Government Departments and Agencies, Regulators in the nonfinancial sectors, State Governments, Local Bodies, etc. The HLC may draw upon external expertise and may also co-opt experts as special invitees.

Recommendations

 The HLC shall finalize specific measures in line with the Terms of Reference along with detailed implementation plan with timelines. It will submit interim reports to Department of Economic Affairs, M/o Finance, every month.

Responsibility of Government Departments

10. The relevant Government Departments/ Agencies/ Non-Financial Sector Regulators shall arrange a catalogue/inventory of laws, rules, regulations, certifications, etc. related to the economic activity in their areas of responsibility, including at the Centre and the States.

Page 3 of 4

11. Ministries/Departments are expected to continue to work on promoting EoDB, simplifying regulations and undertaking regulatory reforms as an ongoing exercise without waiting for the recommendations of the HLC.

Support to the HLC

- NITI Aayog will provide the required secretarial and administrative support for the HLC.
- 13. The sitting fee for the non-official members and special expert invitees may be governed by Department of Expenditure's O.M. No. 19047/10/2016-E.IV dated 12.04.2017.
- 14. The TA/DA entitlements of non-officials may be governed by the Department of Expenditure's O.M. No.19047/1/2016-E.IV dated 14.09.2017.

(S.G.P. Verghese) Joint Secretary Tel. 011-2301 1791

To

Shri B.V.R. Subrahmanyam, CEO, NITI Aayog

Copy to: Chairperson and Members of the HLC (through NITI Aayog)

Copy for information also forwarded to:

- (i) Principal Secretary to the Prime Minister
- (ii) Secretary, D/o Economic Affairs
- (iii) Shri Saurabh Shukla, Director, Prime Minister's Office with reference to their ID No. 260/31/C/0017/2025-FE dated 18.08.2025
- (iv) Secretary (Coordination), Cabinet Secretariat/ Special Secretary (KKP), Cabinet Secretariat
- (v) All Additional Secretaries/Joint Secretaries, Cabinet Secretariat

(S.G.P. Verghese) Joint Secretary

ANNEXURES-2

Category	# of QCOs	India	EU	USA	Japan
Construction	26	All RMs and finished steel under BIS QCOs Building codes (BIS, MoRTH etc.) mandate compliance.	RM is regulated through Construction Product Regulation (CPR) – mandatory certification + audit from a notified body	RM regulated through ASTM standards + a mill test certificate issued by the manufacturer	RM is regulated through JIS embedded via codes/specs— treated as Output regulated at the building-works level
Pressure Vessels & Pipes	14	All RMs under BIS QCOs BIS certification required for plates, pipes and fittings used in pressure applications	- RM is regulated through Pressure Equipment Directive (PED) – mandatory certification + audit from a notified body	RMs must be sourced from an ASME-approved mill; review by an authorized inspector during vessel fabrication	Designated Inspection Agency or METI-authorized body conducts inspection and approves conformity to JIS standards
Engineered Products (Machinery/Tools)	68	All raw materials (RM) and finished goods covered under BIS QCOs Mandatory third-party certification and testing	RMs are not regulated, finished products such as lifting accessories, aerospace uses, etc. are regulated	- RMs are not regulated, finished products such as lifting accessories, aerospace uses, etc. are regulated	- RMs are not regulated, finished products such as lifting accessories, aerospace uses, etc. are regulated
Automotives & Durables	16	All RMs and coated flat products under BIS QCOs	RM is not regulated, the intermediate product Regulation applies at the vehicle or component level managed by vehicle manufacturers	Automotive materials are governed through industry standards (ASTM, SAE, AIAG) and OEM specifications	Japan's automotive sector is regulated via voluntary JIS, and OEM specifications.
Electrical Grade Steel	12	All RMs and finished electrical steels (CRGO, CRNO, amorphous) under BIS QCOs	RM not regulated CE marking by equipment manufacturer on finished electrical product	RM not regulated Finished products must comply with DOE Energy-Efficiency Standards and UL/CSA safety listings	RM not regulated The manufacturer or importer must obtain PSE (Product Safety Electrical Appliance) mark on finished goods
Wires & Ropes	6	All wire rods, drawn wires, prestressing strands, and wire ropes notified under BIS QCOs. Mandatory BIS certification for both input wire and finished rope/strand.	RMs not directly regulated at material stage Finished products (e.g., lifting ropes, prestressing strands) fall under Machinery Regulation (EU) 2023/1230 and Construction Products Regulation (CPR) when used in building works	RMs not regulated Finished products governed by ASME B30 (lifting equipment), ASTM A421/A416 (prestressing wire), and OSHA safety regulations at workplace-use level	RMs not regulated at import or production stage Compliance for finished product verified through manufacturer testing and JIS mark certification for domestic sales
Alloys	6	All ferroalloys (e.g., ferromanganese, ferrosilicon, ferromolybdenum, ferrovanadium, silicomanganese, ferronickel) are covered under BIS QCOs	No CE-marking or notified-body conformity required Regulated under REACH — manufacturers/importers must register alloy compositions and safety data with ECHA	No government conformity certification for alloys Imports and domestic production governed by EPA TSCA (chemical substances control) and OSHA Hazard Communication standard	No product certification requirement Covered by Chemical Substances Control Law (CSCL) and Industrial Safety and Health Law (ISHL) for manufacturing/import
Miscellane ous	5	Several items (expanded- metal sheets, chains, and wire mesh) notified under BIS QCOs.	RMs and semi-finished products not regulated Finished items such as link chains and rigging accessories governed by Machinery Regulation (EU) 2023/1230; CE-marking mandatory for lifting accessories	No RM regulated, Foundry shots/grits regulated only by EPA for emissions and workplace safety.	No RM regulated, JIS certification voluntary
Consumer	4	All consumer stainless-steel products (utensil sheets, razor-blade strips, etc.) covered under BIS QCOs	No RM regulated, finished products only regulated in critical use cases	No RM regulated, finished products only regulated in critical use cases	No RM regulated, finished products only regulated in critical use cases

NOTES

NOTES



