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Shri Pramod Kumar Tiwari, IAS  
Director General  
Bureau of Indian Standards

**Subject: Country of Origin physical marking in ICT Products under CRO**

Respected Sir,

***Greetings from MAIT!***

This is in reference to the Country of Origin (“COO”) physical marking requirements on products under the Compulsory Registration Order (CRO).

Currently, all products under CRO have COO on the physical products as this requirement is being asked during lab testing to meet BIS requirements. The accredited BIS labs are insisting COO marking on the physical product, while there is no clear mandate from BIS either on the BIS Standards IS 13252 or IS 616 etc. for ICT products. To our understanding, COO from Legal metrology and trade compliance perspective is sufficient to have on the packaging of Goods and is not mandatory to have a physical marking on the product.

In 2017, BIS issued the e-labelling guidelines (Reference: Electronic Labelling (e-labelling) Guidelines - CMD III/9:6/e-labelling dated 13.09.2017) for products that have integrated display. The guidelines also mention that BIS marking along with required labelling information is allowed to have in the form of e-label. We are of the view that if COO information is at all required on the product by BIS, COO can be marked as part of e-label for products that have integrated display.

**Ask:**

1. Clarification if COO information is mandatorily required to be on the physical product by any existing BIS notification/Rule/standard or any other Government authority including legal metrology requirements. If available, please share such relevant notification/Rule/standard.
2. If COO is mandatory, then our submission would be to allow the COO information to be made available as part of e-label for products having integrated display and necessary guidelines/notifications can be issued by the relevant Government authority

We would request BIS to help clarify the COO requirements as mentioned above. This will help remove ambiguity on the subject for all stakeholders - Testing labs and OEMs and help prevent any query or undue delay during the manufacturing process and BIS application process, thereby leading to Ease of Doing Business in the country.

Warm regards,

Col. AA Jafri, Retd.  
Director General

CC: Smt. Asha Nangia, Sr. Director & Group Coordinator, Ministry of Electronics & IT  
CC: Shri Saurabh Ranjan, Scientist-D, Ministry of Electronics & IT

**Enclosure:**

Electronic Labelling (e-labelling) Guidelines, Ref.CMD III/9:6/e-labelling dated 13.09.2017 issued by Central Marks Department-III