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Ref.No.MAIT/PY/2200

September 04, 2020

Shri Ajay Prakash Sawhney  
Secretary  
Ministry of Electronics and Information Technology

**Subject: Request for extension of implementation of CRO Phase IV**

**Ref: Notification S.O.1236(E) as notified on April 1, 2020 by MeitY**

Respected Sir,

***Greetings from MAIT!***

We thank your office for the support you have extended to the industry and addressing our concerns. This time we come to you in a time of distress. This bears reference to Notification S.O.1236(E) dated 1<sup>st</sup> April 2020 issued by MEITY that has notified new items to the list of products that need to comply to the Schedule of the “Electronics and Information Technology Goods (Requirements for Compulsory Registration) Order, 2012.

MAIT assures you that the electronics and ICT hardware industry stand aligned with the MEITY’s efforts to improve consumer safety in India. The industry has always offered its global knowledge and experience to the country in this endeavour and understand that regulations are important and necessary for safety of the consumers and to help promote local manufacturing and certification of these products in India.

However, this notification has two unique perspectives to it, one it coincided with the Covid Pandemic and secondly it includes products and components that are an essential part of every electronic sub-system.

These two have thrown the industry into disarray as due to the global lockdown, the Industry lost a good four months of the ramp up window. Supply chains across the world came to a halt. Both planning and manufacturing were suspended due to the overall uncertainty. Further, once the supply chains did start opening, it was not consistent across the world, delaying the samples and the test jigs required for CRO Certifications. Similar challenges were faced by the Labs that do the testing and certification in India.

On another front, the industry has finished goods or goods in the final stage of manufacturing, but without CRO number ready for shipment, these will reach India only after the cut-off date and the same will not be cleared by the Customs. These goods are consigned to each specific Brands and the inability to take them to the market will cause huge financial losses, adding to the trauma of the Pandemic. On the products for which CRO Number being issued now, there will be 8-12 weeks of lead time for incorporating the same into production batches followed by lead time for shipment. In view of the above circumstances, the country will also face the threat of a break in supply chain during this period.

Owing to the unavoidable and unfortunate circumstances, which are in the nature of force majeure, we sincerely request your good office to consider the Industry's request for an extension in the implementation of the Notification S.O. 1236(E) dated 1<sup>st</sup> April 2020 by a period of six months.

This measure will enable the industry to comply with the law of the land, ensure that there is no break in supply chain and avoid huge financial losses.

Request your good office to kindly take the above on record and allow our request.

With regards,

A handwritten signature in black ink, appearing to read 'George Paul', written in a cursive style.

George Paul  
Chief Executive Officer

CC: Shri Saurabh Gaur, Jt. Secretary, Ministry of Electronics & IT

CC: Ms. Asha Nangia, Sr. Director, Ministry of Electronics & IT

Ref:

MAIT request dated 10<sup>th</sup> Apr, 2020 reference number Ref.No.MAIT/PY/2078

MAIT request dated 23<sup>rd</sup> Jul, 2020 reference number Ref.No.MAIT/PY/2178

MAIT request dated 28<sup>th</sup> Aug, 2020 reference number Ref.No.MAIT/PY/2196

MAIT request dated 3<sup>rd</sup> Sep, 2020 reference number Ref.No.MAIT/PY/2199