

# **Legal Metrology**

**GSR 629(E) dated 23<sup>rd</sup> June, 2017**

**PFNDAI**

**Mumbai, March 8, 2018**

# G.S.R. 629(E).— Legal Metrology (Packaged Commodities) Amendment Rules, 2017

## Key highlights

- Effective 1<sup>st</sup> Jan 2018
- Increase in font sizes for LM declarations

Area of PDP (sq. cm.)	Current (mm)	Earlier (mm)
<50 to <100	1.5	1
<100 to <500	2.5	2
<500 to <2500	4	4

- Discussion about applicability of table - Increase in font sizes should be applicable to 'LM' declarations
  - MRP &
  - Consumer care details (email & contact number)

# G.S.R. 629(E).— Legal Metrology (Packaged Commodities) Amendment Rules, 2017

- Principal Display Panel area is defined as:-

Type of container	Proposed*	FSSAI
Rectangular	One side	40% of one side height X width of panel
Cylindrical or nearly cylindrical package	40%	20%
Other shaped package	40%	20%

\*Not including the top, bottom, flange at top and bottom of cans, and shoulders and neck of bottle and jars

- Legal Metrology (Packaged Commodities) Rules, 2011 clause 6 (1) Explanation III The clauses of Food Safety and Standards (Packaging and Labelling) Regulation 2011 shall be applicable.

# Legal Metrology Changes impact

- Proposed changes impacted **ALL** inventory
- Industry represented for extension of GSR 629 till Jun 2018
- Multiple transactions between chambers and Legal Metrology
- Legal Metrology extensions
  - GSR 629 - implementation from Jan 2018
  - 1<sup>st</sup> extension - 31<sup>st</sup> Mar 2018 with condition to comply by stickering/  
stamping/ online printing
  - 2<sup>nd</sup> extension - Not to prosecute till 31 Jan 2018
  - 3<sup>rd</sup> extension - extension till 28 Feb 2018
  - 4<sup>th</sup> extension - extension till 30 Apr 2018

# Summarizing.....

- LM notification is applicable from May 2018
- Increased font sizes applicable to LM declaration
- Other declarations to be done as per Food Safety and standards (Packaging and Labelling) regulation, 2011
- PDP area are defined both in FSSAI and in LM. Compliance needs to be with both.



**Thank You**

# Chronology of representations

SN	Date	Event	Description
1	23 Jun 2017	LM notification issued	Notification particularly affected in terms of Font size declarations, differential MRP prohibition and PDP size increment for products. Implementation date was 01 Jan 2018
2	14 Nov 2017	FICCI representation submitted	Representation highlighting issues submitted to Legal Metrology highlighting all important subject matters.
3	01 Dec 2017	FICCI organized interaction with BN Dixit	<ol style="list-style-type: none"><li>1. LM discussed about releasing FAQs for smooth implementation.</li><li>2. LM had reservations on differential MRP clause removal.</li><li>3. Clarification on FSSAI vs LM applicability was obtained where MRP, net weight and consumer care details were designated LM applicable area.</li><li>4. Extension was sought for finishing inventory with organizations.</li></ol>
4	01 Dec 2017	FICCI submitted representation to MoCA for extension	FICCI sought 6 months extension from 01 Jan 2018.

# Chronology of representations

SN	Date	Event	Description
5	19 Dec 2017	LM department issued 1 <sup>st</sup> advisory for smooth implementation	<ol style="list-style-type: none"> <li>1. Chambers pursued LM continuously for extension.</li> <li>2. An extension was granted upto 31 Mar 2018 with condition that by stickering or stamping or by online printing requirements shall be complied with.</li> <li>3. Chambers again re-engaged with LM.</li> </ol>
6	20 Dec 2017	CII and FICCI re-engagement	<ol style="list-style-type: none"> <li>1. CII and FICCI again represented highlighting difficulty in complying proposed condition in LM advisory</li> </ol>
7	23 Dec 2017	LM issued 2 <sup>nd</sup> advisory for GST implementation	<ol style="list-style-type: none"> <li>1. For organization impacted by GST implementation, LM permitted change to print reduced MRP by stickering/ printing/ stamping till 31 Mar 2017</li> </ol>
8	27 Dec 2017	FICCI represented to MoCA for smooth implementation	<ol style="list-style-type: none"> <li>1. FICCI re-wrote to MoCA highlighting difficulty in compliance with smooth implementation of advisory by way of stickering/ stamping/ printing.</li> <li>2. FICCI sought relief from condition of compliance by stickering/ stamping/ printing.</li> </ol>
9	02 Jan 2018	LM issued 3 <sup>rd</sup> advisory for smooth implementation	<ol style="list-style-type: none"> <li>1. LM issued 3<sup>rd</sup> advisory where relief was provided to organizations by directing all states and UTs not to prosecute organizations till 31 Jan 2018.</li> <li>2. State and UTs were asked to provide opportunity to industry to comply.</li> </ol>



# Chronology of representations

SN	Date	Event	Description
10	24 Jan 2018	FICCI resubmitted representation to MoCA again for extension for 6 months	1. FICCI filed same representation on 01 Dec, 27 Dec and 24 Jan seeking extension for 6 months starting 01 Jan 2018.
11	25 Jan 2018	LM released FAQs for industry	FAQs provided answers to general questions and clarified details for compliance.
12	30 Jan 2018	CII submitted representation seeking extension with LM	CII sought extension till 30 June 2018.
13	05 Feb 2018	LM issued 4 <sup>th</sup> advisory for smooth implementation	LM extended date for consumption of inventory until 28 Feb 2018
14	15 Feb 2018	FICCI filed another request for extension with LM	FICCI re-sought extension till 30 June 2018.
15	02 Mar 2018	LM issued 5 <sup>th</sup> advisory for smooth implementation	LM extended date for consumption of inventory until 30 Apr 2018