

17.12.2025

Shri Piyush Goyal
Hon'ble Minister of Commerce & Industry
Government of India
Udyog Bhawan, New Delhi – 110011

Subject: Proposed exemption of amusement machines from the safety of household, commercial and similar electrical appliances (quality control) order, 2025

Hon. Minister,
Greetings from Retailers Association of India (RAI)!

RAI is the unified voice of Indian retailers working with all the stakeholders for creating the right environment for the growth of the modern retail industry in India. It encourages, develops, facilitates and supports retailers to modernise and adopt best practices that will delight customers. RAI is the premier body of Retailers in India, having around 14000-member establishments, including large and small retailers in the country, representing approximately 700,000 retail stores.

We are concerned that the proposed application of the *Safety of Household, Commercial and Similar Electrical Appliances (Quality Control) Order, 2025 (QCO)* to commercially operated amusement machines will result in significant and adverse consequences for indoor amusement centre operators and our retail members more generally.

Indoor Amusement Centres

Indoor amusement centres represent an important and growing segment of the broader retail industry. Spending on experiences has increased significantly in recent years and leisure and entertainment-based spending has been one of the key drivers of this trend. By attracting consumers to organised malls and retail precincts, indoor amusement centres make a valuable contribution to the performance and viability of complementary and adjacent retailers.

Our indoor amusement centre members include some of the world's leading operators. Some have been operating in India for decades and many have invested a significant amount of capital. These members have adopted best practices from other parts of their networks to ensure that Indian consumers benefit from best-in-class safety and access to the latest and most innovative amusement machines.

Concerns regarding the application of the QCO

We fully support the Government's objectives of strengthening product safety, competitiveness and manufacturing strands. However, applying the QCO to commercial amusement machines would carry significant and unintended consequences for both indoor amusement centre operators and the broader retail ecosystem that depends on the footfall driven to retail destinations by indoor amusement centres.

The consequences of greatest concern to our members are as follows:

1. **Constrained supply and slower refresh cycles:** Indoor amusement centre operators routinely rotate, upgrade and replace amusement machines to appeal to changing consumer preferences. Imposing restrictive importation and testing requirements on these low volume, highly customised amusement machines will inevitably impede this process, diminishing the appeal of indoor entertainment centres.
2. **Cost to consumers:** The additional compliance and logistics costs associated with a with heavy, large format amusement machines will lead to increased costs to consumers and a reduction in the quality and variety of amusement games offered to consumers in India.
3. **Adverse impact on retail employment and performance:** The incremental costs of compliance, constrained and delayed access to new product and consequential reduction in profitability and footfall will have a devastating effect on indoor amusement centre operators. Complementary and adjacent retailers will also suffer, leading to a substantial and adverse impact on retail employment and performance.

Risk-based regulation

We urge the Ministry to give close consideration to the regulatory burden that the application of the QCO to commercial operated amusement machines will impose on industry.

Amusement machines operated on a commercial basis are generally:

- a. manufactured by reputable local and international manufacturers in compliance with broadly accepted international standards;
- b. operated by professional operators in a context where the condition and operation of those machines can be closely and carefully monitored;
- c. maintained and repaired on a regular basis by professional technicians; and
- d. constructed in a manner, and from materials, appropriate for high frequency use in a commercial context.

We respectfully submit that these pre-existing controls adequately mitigate the risks associated with amusement machines and any residual risks do not warrant regulatory intervention in the form of the QCO.

Conclusion

RAI's membership depends on healthy, high-traffic retail destinations. The evidence is clear that indoor amusement centres are key contributors to these destinations. Any marginal safety improvements resulting from the application of the QCO to commercially operated amusement machines would be far outweighed by the widespread, negative impact on indoor amusement

centre operators and the other retailers who depend on the footfall driven to retail destinations by these operators.

We respectfully urge the Ministry to exempt commercial amusement machines from the scope of the QCO.

We hope that you will consider our appeal and look forward to your response.

Warm Regards,
For and on Behalf of Retailers Association of India,



Gautam Jain, Director – Advocacy, RAI