

06.11.2020

Shri Anil Agrawal,
Hon'ble Joint Secretary,
DPIIT,
Government of India

Subject: Request your intervention to allow for deferment of timeline as per Order issued on October 27, 2020 for new BIS standards for Footwear

[Reference: Order No. CG-DL-E-28102020-222796 dated 27 October 2020](#)

Hon'ble Joint Secretary,
Greetings from the Retailers Association of India (RAI)!

At the outset, we would like to acknowledge the relentless efforts of the Central to combat and contain the COVID-19 pandemic that has engulfed the entire world.

We are writing to you with reference to the order dated October 27, 2020 issued by Department for Promotion of Industry and Internal Trade, which specifies that Footwear made from Leather and other materials shall bear the Standard Mark under a licence from the Bureau of Indian Standards as per Scheme-I of Schedule-II of Bureau of Indian Standards (Conformity Assessment) Regulations, 2018.

Sir, we understand that this order is intended to ensure quality and safety of footwear. **However, abrupt implementation of the notification, without giving sufficient time will lead to disruption in the market.** Implementation of this notification with immediate effect will lead to heavy losses for businesses as:

1. There are stocks lying in the factories which cannot be dispatched.
2. Raw materials have been ordered for upcoming season's supplies.
3. There cannot be any production as the QCO comes in force with immediate effect. There will be a huge loss of GST to the exchequer.
4. There will be wide scale job loss as small enterprises cannot afford to pay wages in the absence of any production.
5. Factories need time to arrange for qualified lab technicians to be able to carry out testing.
6. BIS certification in itself is a time-consuming process and needs to be done with full rigor and detailing in order to ensure total compliance and meet the stated objective of the order.

It is therefore our humble request to grant extension of 12 months in the implementation of the QCO.

Retailers are facing unprecedented times with a world-wide coronavirus pandemic and this would **defeat the objective of the Government to enable 'Ease of Doing Business' and economy revival.**

Further, RAI has formed a working group wherein Footwear companies are evaluating as to what products are involved in manufacture of various footwears. We shall share the detailed representation in due course. **In the meantime, it is our humble suggestion that enforcement of this order should be deferred until the stakeholders can put forth their recommendations.**

We hope you will consider our representation addressing the key concerns of the footwear industry in these very challenging times.

We await an immediate resolution.

Warm regards,
For and on behalf of Retailers Association of India (RAI),



Gautam Jain, Director – Finance & Advocacy