



RETAILERS ASSOCIATION OF INDIA

Date: 28th August, 2014

Shri. G. Gurucharan Singhji,
Additional Secretary,
Ministry of Consumer Affairs
New Delhi.

SUBJECT: Postponement of Notification amending Packaged Commodities Rules under Legal Metrology Act - for Green and Brown dot for cosmetics issued by MoCA.

Respected sir,

Greetings from Retailers Association of India (RAI)!

It is my pleasure to write to you on behalf of RAI.

This is with reference to the notification issued by the Ministry of Consumer Affairs dated 16th June, 2014 with regards to cosmetic products and toiletries bearing Red or Brown dots for non-vegetarian and green dot for vegetarian products.

A few of our member retailers received notices from the Local Legal Metrology departments for selling/ storing products in violation of the said Notification. You will appreciate the Notification has raised more questions than it answered, namely:

1. Retailers purchase goods for sale from manufacturers/ distributors/ importers whose primary duty is to comply with this new Rule. However, our member-retailers are receiving regularly products that are violating the Notification and its conditions since manufacturers' pipeline is planned months in advance, like our members' purchases, hence such products will flood the market for at least another 6 to 9 months.
2. Manufacturers' labels are pre-designed, printed, and kept ready months in advance. Therefore complying with this Notification means that such inventory running into crores of rupees, should be wasted or destroyed. We sincerely hope that the intent of the Ministry in issuing this Notification was not to waste such valuable national resource.

RAI National Council

B A Kodandarama Setty,
Vivek Ltd.

B S Nagesh,
Shoppers Stop Ltd

Kishore Biyani,
Future Group

Noel Tata, Trent Ltd.

Shashwat Goenka, Spencer's
Retail

Vinay Nadkarni,
Globus Stores Pvt. Ltd.

Ajit Joshi,
Infiniti Retail Ltd.

Atul Chand,
ITC - LRBD

Bhaskar Bhat,
Titan Industries Ltd

Bijou Kurien,
Chairman, FICCI Retail
Committee

Kabir Lumba,
Lifestyle International (P) Ltd

Gibson G Vedamani,
Sharon Wayne Inc

Govind Shrikhande,
Shoppers Stop Ltd

Jamshed Daboo,
Trent Hypermarket Ltd

Pinakiranjan Mishra,
Ernst & Young Pvt. Ltd.

Rafique Malik,
Metro Shoes Ltd

Rakesh Biyani,
Future Group

Rahul Mehta,
CMAI

Shubhranshu Pani,
Jones Lang LaSalle



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We understand that the department has brought the Notification without consulting various stake holders on this subject. Therefore, may we request you to keep this Notification in abeyance till fair hearing is given to the stakeholders or, kindly provide a moratorium period of 9 months to all the stakeholders for complying with the same. Kindly advise all your state Legal Metrology Controllers accordingly.

Regards,

For Retailers Association of India,

Gautam Jain

Head – Advocacy & Finance

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