



17 July 2018

Shri B. N. Dixit
Director,
Legal Metrology Division,
Ministry of Consumer Affairs,
Government of India
Krishi Bhawan,
New Delhi-110 001
E-mail: dirwm-ca@nic.in

**Re: Legal Metrology Amendment in respect of font size of statutory
declarations on label – Notification no. GSR 629(E)
dated 23.06.2017**

Sub: Extension for utilizing old stock of packing material

Dear Sir,

The Ministry of Consumer Affairs vide notification no GSR 629 (E) dated 23.6.2017 had amended Rule 7(2) and 7(3) of the Legal Metrology (Packaged Commodities) Rules '2011 whereby it is required that the minimum height of letter and numeral on the label of the product would depend on the area of the Principal Display Panel. This amendment was to be implemented w.e.f. 1st January 2018. On representations received from Industry your office had granted extensions in the matter and now vide letter no. WM - 10(6)/2018 dated 14.06.2018 it has been extended upto 31st July 2018.

Many of our members are FMCG Companies who manufacture medicines, cosmetics, food items etc. They have their manufacturing unit situated in our State. They procure packing materials in bulk so that they can get the same at economical rates.

Our members have taken steps for changing the labels of their products once this amendment was notified by the Government. However, in spite of their best efforts to utilize all the old stock of packing material; a large quantity of packing material is still lying in their stock which does not comply with the provisions of amended Rule. This unexhausted stock of packing materials is complying with all other provisions of Legal Metrology (Packaged Commodities) Rules' 2011 except the amended Rule. They would not be able to utilize the same by 31st July, 2018.

The packing material cannot be utilized due the following reasons:

- a) Products being seasonal in nature – The left-over stock of unutilized packing material of one season can be utilized only in the next season.
- b) The Sales of the FMCG products were considerably lower in 2017-18 due to disruption in trade caused by Demonetization and GST introduction.
- c) They procure packing materials in bulk. Due to drop in sales; the production was also affected. Hence, the packing materials cannot be utilized.

In view of above, we request your goodself to grant extension of further six months for utilizing the old stock of packing material to avoid huge loss to our members as most of them belong to Small and Medium Sector.

Thanking you,

Yours faithfully,


(Ramesh Agarwal)
President