

FI. No. 9/28/2019-HE&MT-Part(1) [E-28771]
Government of India
Ministry of Heavy Industries
HE&MT Section

Room No. 327, Udyog Bhawan,
New Delhi. Dated: 17th June, 2025.

To,

Members of the Subcommittee on Plastic Machinery.

Subject: Minutes of the 1st Meeting of the Subcommittee on Plastic Machinery under the Chairpersonship of Shri Shubhankit Srivastava, Deputy Secretary, Ministry of Heavy Industries held on 02.06.2025 in Udyog Bhawan, New Delhi-reg.

Madam/Sir,

I am directed to refer to the subject mentioned above and to forward herewith the minutes of the 1st meeting of the Subcommittee on Plastic Machinery under the Chairpersonship of Shri Shubhankit Srivastava, Deputy Secretary, Ministry of Heavy Industries, held on 02.06.2025 at 15:30 hrs. in Udyog Bhawan, New Delhi, for information and further necessary action.

Encl: As above.

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Copy to:

1. PA to Joint Secretary, MHI.
2. PA to Director (HE&MT), MHI.

Minutes of the 1st Meeting of the Subcommittee on Plastic Machinery under the Chairpersonship of Shri Shubhankit Srivastava, Deputy Secretary, Ministry of Heavy Industries, held on 02.06.2025 in Udyog Bhawan, New Delhi.

The 1st Meeting of the Subcommittee on Plastic Machinery was held on 02.06.2025 at 15:30 hrs. under the Chairpersonship of Shri Shubhankit Srivastava, Deputy Secretary, Ministry of Heavy Industries (MHI) in Udyog Bhawan, New Delhi. The list of participants is attached in the **Annexure**.

2. At the outset, the Chairperson welcomed all participants and provided a brief overview of the meeting. He stated that this Subcommittee on Plastic Machinery has been constituted in accordance with the recommendations made during the 1st meeting of the Technical Committee to monitor and streamline the implementation of the “Machinery and Electrical Equipment Safety (Omnibus Technical Regulation) Order, 2024” (OTR), held on 29.04.2025 in New Delhi.

3. The Chairperson further set the context of the deliberations by providing the following agenda points: -

3.1. **List of HSN Codes:** The Subcommittee shall review HSN codes relevant to Plastic Machinery mentioned in OTR, mapping with IS codes, assess their alignments, recommend necessary clarifications, modifications, or realignments to address any inconsistencies or ambiguities.

3.2. **Product-wise Implementation Timelines:** The implementation of OTR is proposed to follow a product-wise timeline to enable a phased and structured rollout. This approach takes into account the varying degrees of readiness across different product categories and is intended to ensure a smooth transition for all stakeholders.

3.3. **Type C standard available and requirements of new IS codes:** BIS has provided new Type C standards (Machine Safety Standards dealing with detailed safety requirements for a particular machine or group of machines), same are to be circulated amongst stakeholders and further Industry Associations should suggest new Type C standards, if any, under the Third Schedule of the OTR and IS standards. The objective is to assess their applicability, adequacy and to provide recommendations for their effective adoption and enforcement.

3.4. **Sector-specific FAQs:** Expectation on sector-specific Frequently Asked Questions (FAQs) from the industry stakeholders. These resources aim to enhance the stakeholder understanding and support the effective implementation of OTR. Industry Associations will be providing the list of FAQs after consultation with their industry partners.

4. The members of the Subcommittee on Plastic Machinery shared their views and provided comments/ suggestions on the above-mentioned agenda items, as detailed below: -

4.1. Anu Chaudhary, Secretary General, PMMAI, highlighted that there are nine (09) HSN codes under the 4-digit heading 8477, included in OTR, which are relevant to the Plastic Machinery sector. These codes cover a range of machinery used for molding, shaping, and processing plastics.

HSN Codes	Particulars
84771000	Injection-molding machines
84772000	Extruders
84773000	Blow molding machines
84774000	Vacuum molding machines and other thermoforming machines
84775100	For molding or retreading pneumatic tyres, or for molding or otherwise forming inner tubes
84775900	Other
84778010	Machinery for making rubber goods
84778090	Other
84779000	Parts

4.2. Shri Sanjay Chavre, Advisor, TAGMA, stated that under the OTR, there is an expectation that new machines, old/used machines, as well as machinery supplied in CKD (Completely Knocked Down) and SKD (Semi Knocked Down) forms are comprehensively covered. He emphasized the need for a formal clarification on this aspect to ensure uniform understanding and implementation across stakeholders.

4.3. In response, the Chairperson clarified that OTR shall apply to all machines and electrical equipment listed in the first Schedule. He further informed that assemblies, sub-assemblies, and components are currently under active discussion at the Ministry, and a “Machinery and Electrical Equipment Safety (OTR) Amendment Order” will be published shortly to provide further clarity on this matter.

4.4. Shri Mukund Ghumara, Chief Manager, Siemens Ltd. (representing FICCI), pointed out that certain HSN codes/products are not currently covered under the OTR, but are essentially used in the plastic industry. He sought clarification on how such cases would be addressed.

4.5. In response, Shri Rakesh Kumar, Director, BIS, clarified that new HSN codes and products can certainly be considered for inclusion through the appropriate process. The matter can be taken up in consultation with stakeholders and the Ministry for further action.

4.6. BIS clarified that certification will be granted only for Indian Standards. Certification based on other standards (ISO, API, ASME, etc.) is not permissible under BIS procedures. He further explained that Type C standards take precedence over Type B and Type A. Similarly, Type B standards take precedence over Type A.

4.7. Shri Chetan Pandya, Senior Deputy General Manager, Milacron India Private Ltd. (representing PMMAI), shared concern regarding increasing number of Quality Control Orders (QCOs) being introduced across various sectors. He observed that the BIS appears to be overloaded with certification responsibilities, which could potentially impact timelines. In such cases, he suggested that products not manufactured in India may need to be given first priority for certification, to facilitate smoother import and trade operations.

4.8. Anu Chaudhary, Secretary General, PMMAI, highlighted that nearly 80% of the plastic machinery industry comprises MSMEs. She emphasized that for the effective implementation of the OTR, there is a critical need for handholding, enhanced infrastructure support, and an extension of the implementation timeline to ensure compliance, especially for smaller manufacturers.

4.9. Shri Kumar Abhinav, Scientist C, CMTI, informed that more than 25 awareness programs have already been conducted in cities such as Bangalore, Pune, Allahabad, Rajkot, and Ludhiana, reaching over 1,800 industry participants. He assured stakeholders that, based on further requirements, additional programs can be organized.

4.10. Shri Rakesh Kumar, Director, BIS, informed that new Type C standards have already been identified and will be available shortly on the BIS website. He further mentioned that the certification registration portal is expected to be operational by the end of June 2025.

4.11. He also explained the certification process by mentioning that BIS will grant certification to OEMs through a two-step procedure. First, the manufacturer has to submit an online application with a relevant technical file. Following this, BIS will undertake scrutiny of the submitted documents and conduct a physical inspection of the manufacturing facility to assess its production processes, testing capabilities, and compliance with applicable safety standards. Certification will be granted upon satisfactory completion of both stages.

4.12. Shri Rahul Vachaspati, Executive Director, ATMA India, raised two important queries. First, he enquired about the status of confirmation or acknowledgement emails for companies registered under the BIS pre-registration portal, noting that some stakeholders have not yet received any communication. In response, the BIS confirmed that acknowledgement emails have been sent to all registered email addresses provided during the registration process.

4.13. The second query pertained to responsibility for obtaining BIS certification in various scenarios, particularly where manufacturing involves multiple parties such as job workers, subcontractors, or outsourced vendors. He sought clarification on who is ultimately required to be certified under the OTR. To this, BIS clarified that the final manufacturer of the complete machine is to obtain the certification, not the job worker or subcontractor performing partial work. The obligation lies with the entity responsible for final assembly and ensuring conformity with the applicable standards.

4.14. Anu Chaudhary, Secretary General, PMMAI, proposed holding a Workshop on OTR in Plastics Machinery on 26th June 2025 in Ahmedabad. She invited the Ministry and BIS to join a special session, highlighting that 100+ MSME companies are expected to attend. The workshop aims to address industry queries and support effective OTR implementation.

4.15. Ms. Aditi Sharma, Senior Assistant Director (Manufacturing), FICCI, expressed concern that many small-scale industries are unaware of OTR and lack clarity on how it will impact them. She emphasized that larger companies are generally better informed and often work with smaller suppliers, who are not well-acquainted with the certification process or future compliance requirements.

4.16. She further recommended that targeted communication and awareness initiatives be undertaken to reach MSMEs. She stressed that the representation of small industries is essential, and this can be effectively achieved through industry associations and collaborative outreach efforts.

4.17. Shri Sidharth Prasad, Director (Public Affairs), Michelin India Private Ltd. (representing CII), suggested that engaging with regional industry clusters could significantly enhance awareness and understanding of the OTR among MSMEs. He emphasized that localized outreach efforts may be more effective in reaching the smaller manufacturers and ensuring broader industry participation and compliance.

4.18. He further raised a query regarding the timeline for BIS certification. He expressed concern about the mechanism for ensuring compliance in the event of delays in certification. In response, BIS clarified that certifications will be issued within 60 days (approx.) from the date of application. The certification will be valid for 3 to 5 years, and two types of certifications will be granted: "Continuous Production Certification" and "Certification of Conformity."

4.19. Debolina Mukherjee, Deputy Director, EEPC India, highlighted the importance of awareness programs and suggested that more sessions/webinars may be conducted for the stakeholders and industry associations.

5. After detailed deliberations, the Subcommittee on Plastic Machinery has recommended the following: -

5.1. Members will review and share feedback on the list of HSN codes relevant to their sector, keeping in view that the products falling under such HSN codes, particularly where standardization gaps exist or clarification is needed.

[Action: All Members of Subcommittee]

5.2. Members will suggest product-wise implementation timelines for OTR, based on available BIS sources, ensuring that existing operations remain uninterrupted.

[Action: All Members of Subcommittee]

5.3. Members and Industry Associations will submit sector-specific FAQs after consulting with industry partners and stakeholders.

[Action: All Members of Subcommittee]

5.4. Members and Industry Associations may review existing Type C standards (Machine Safety Standards dealing with detailed safety requirements for a particular machine or group of machines) and suggest new Type C standards, if any, under the Third Schedule of the OTR.

[Action: All Members of Subcommittee]

5.5. Members should provide all suggestions/input for consideration in the 2nd meeting of the Subcommittee by 30th June 2025.

[Action: All Members of Subcommittee]

The meeting ended with vote of thanks to the Chair.

List of Participants

1. Shri Shubhankit Srivastava, Deputy Secretary, Ministry of Heavy Industries
2. Shri Kumar Abhinav, Scientist C, CMTI
3. Shri Rakesh Kumar, Director, Central Marks Department-III, BIS
4. Shri Dheeraj Kumar Meena, Under Secretary (LEI Section), DPIIT
5. Shri Arnab Kumar Show, Consultant (Technical), Ministry of Heavy Industries
6. Shri Sudesh Kumar, Consultant, Ministry of Chemicals and Fertilizers (DCPC)
7. Anu Chaudhary, Secretary General, PMMAI
8. Shri Chetan Pandya, Sr. Deputy General Manager, Milacron India Pvt. Ltd. (PMMAI)
9. Shri Sidharth Prasad, Director (Public Affairs), Michelin India Pvt. Ltd. (CII)
10. Shri Ashish Agrawal, Manager (Standards & Regulations), Michelin India Pvt. Ltd. (CII)
11. Shri Saunak Banerjee, Consultant, CII
12. Shri Abilash Uttam, Executive Officer, CII
13. Shri T Nandhakumar, Asst. General Manager, Shibaura Machine India Pvt. Ltd. (CII)
14. Shri Sanjay Chavre, Advisor, TAGMA
15. Aditi Sharma, Sr. Assistant Director (Manufacturing), FICCI
16. Shri Mukund Ghumara, Chief Manager, Siemens Ltd (FICCI)
17. Shri Rakesh Kumar Sangrai, Director, PHDCCI
18. Dr. Vivek Arya, Additional General Manager, BHEL
19. Shri Mallikarjun Javali, Director General, AIPMA
20. Shri Hareen Sangvi, Managing Committee Member, AIPMA
21. Shri Rahul Vachaspati, Executive Director, ATMA India
22. Shri Harminder Singh, Director, S&T Plastic Machine Pvt. Ltd.
23. Shri Nandkumar K, Deputy Chairman, PPMAI (CII)
24. Prof. Subrata Karmakar, NIT Rourkela
25. Shri Vinay Bansod, Executive Director & CEO, Windsor Machines Limited
26. Debolina Mukherjee, Deputy Director, EEPC India
27. Shri Niral Khandhar, General Manager, Nilkamal Limited
28. Shri Deepak Lawale, Secretary General, Organization of Plastics Processors of India
