



Dr. Ranjeet Mehta
CEO & Secretary General

Ind-54-Health
17th February 2025

Hon'ble Minister,

Subject: Request for Exemption or Extension of BIS Certification for Massage Appliances for 3-5 years under Chapter 90191020, BIS IS 302 (Part 1) 2008, Serial No. 9 to Ensure Public Health and Access to Essential Products

The MSME sector in India has shown significant activity in both exports and imports. The sector plays a pivotal role in India's economy through substantial contributions to GDP and exports, it also contends with challenges from competitive imports. Ongoing government initiatives aim to bolster the sector's growth and resilience. MSME sector in India has consistently contributed approximately 30% to the nation's Gross Domestic Product (GDP). In the fiscal year 2022-23, MSMEs accounted for 30.1% of India's GDP.

PHD Chamber would like to draw your kind attention to a concern received from the industry and request an exemption or extension regarding the BIS certification requirements for these products. Below are key points for your kind consideration:

- **Product Benefits and Usage:** These products are essential in home healthcare, aiding in the recovery of patients with conditions like diabetes, Alzheimer's, paralysis, sports injuries, and post-surgery trauma, while improving blood circulation, preventing bed sores, and assisting elderly individuals and patients with limited mobility.
- **Market Overview:** Over 95% of these products are imported, with no local manufacturing in India, and the high cost of setting up manufacturing units (₹100 crores) makes it non-viable due to the limited market size.
- **BIS Certification Challenges:** The recent Gazette (September 17th, 2024) mandates BIS certification, but the process takes 2-3 years due to inspection delays in Chinese factories and the lack of specific standards for massage appliances, which impacts product availability in India.
- **Technology and Manufacturing Constraints:** The technology for these products is primarily sourced from China, and setting up local manufacturing in India could take up to 5 years, while the small market size (annual imports below USD 20 million) makes significant investment in local production unviable.

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- **Impact on MSMEs and the Economy:** The MSME sector, which imports and sells these products, contributes to GST, ESI, and PF. A sudden halt in imports would disrupt businesses, lead to unemployment, cause revenue loss (GST, customs duties, cess), and fuel the growth of parallel markets.

These products are very helpful in-home health care sector. People who go for physiotherapist, are advised to use some of these products, also sugar patient have severe pain in legs and use of foot and leg massager helps them. All massage appliances help increase blood circulation and have a long-term positive effect of human body. It is also used for patient suffering from bed sores and Alzheimer's as well. Massage helps in paralysis and also sometimes to recover post strokes. In today's date massage products are most important alternatives where sometimes even medicines are unable to offer relief. These products are today used for sports injury too, for accidents recovery post-surgery, post fracture etc. It's a must for OLD AGE people too who are unable to walk and get blood circulations in place.

We humbly request the government to either exempt massage appliances from BIS certification or grant a 3-5 year extension for foreign suppliers to obtain certification, ensuring imports can continue until the domestic manufacturing ecosystem is established. For the "Make in India" initiative to succeed, a proper ecosystem must be established, and we need time to develop local production capacity.

An exemption or extension will ensure that essential healthcare products remain available for patients in need, while also supporting the MSME sector. Disruptions in the supply of these products would adversely affect patients, particularly the elderly and those recovering from trauma, who rely on these products for their health and recovery.

Looking forward to your kind support in safeguarding the industry of India.

With best regards,

Yours' Sincerely


(Dr. Ranjeet Mehta)

Shri Piyush Goyal

Hon'ble Minister of Commerce and Industry,
Govt. of India
Vanijya Bhawan,
New Delhi - 110011

CC:

- **Ms. Himani Pande,**
Additonal Secretary, DPIIT, Govt. of India
- **Shri Sanjiv Singh,**
Joint Secretary, DPIIT, Govt. of India
- **Shri E. Srinivas,**
Joint Secretary, DPIIT, Govt. of India