

## Q&A

# All you need to know about BIS Certification for Chemicals

#	Questions	Answers
1.	How will it affect the polymer imports?	BIS regulation is not only for polymers and it might not effect import of all the polymers. However, if a polymer is listed within mandatory list for certification under BIS certification scheme, then such polymer needs to comply with BIS norms for its importation or placing in the Indian market.
2.	Are Chemicals regulated under BIS?	Yes, chemicals are regulated under BIS. At present there are total 32 chemicals within the mandatory certification list of BIS.
3.	Are you sure that there are 32 chemicals only for the mandatory certification?	Yes, at present there are only 32 chemicals under the mandatory list. However, this list would be an active list and more chemicals would to be added to the list. This is mainly because there would be more chemicals under consideration for upgrading current IS specifications and it may find its place in the mandatory list.
4.	Can you throw some light on the domain of Chemical Management & Safety Rules and the ISI scheme and how these two differ?	Chemical Management & Safety Rule applies to all substances, substances in mixtures, intermediates and substances in articles that are manufactured, imported and are placed in Indian territory if its volume is more than 1 tonne per year. This rule will come into force very soon and as on date the 5th draft of India chemical safety management rule 20XX is available on <a href="http://gpcgateway.com">gpcgateway.com</a> . Whereas ISI is a certification scheme dealing with safety and quality of Chemicals.
5.	Chemicals regulated under BIS Who can apply for BIS certificate?	Applicant for BIS certificate will always be the manufacturer. However, in case of an overseas manufacturer they can apply for BIS certification by appointing an Authorized Indian Representative (AIR).

6.	What are the obligations of a downstream user/ formulator (who procures raw materials different suppliers) under BIS Certification for Chemicals?	There is no further obligation for a downstream user who has procured the substance from a supplier/ manufacturer who has certified the substance under mandatory certification scheme of BIS. One certificate is valid within the supply chain for that substance.
7.	Is BIS certification a part of Indian REACH?	No, BIS certification and India REACH are two different compliance obligation for placing the substance in Indian market.
8.	Whether BIS allow Self certification under the ISI scheme or the certificate is only provided by BIS?	BIS is the certification agency and certificate released by this agency is only accepted for a substance. There is a voluntary certification scheme available within the BIS for which an application has to be made to BIS. Self-certification of any product does not hold any valid recognition.
9.	Is the chemical BIS certificate required for single substance only?	The existing BIS certification scheme is applicable on the finished products and not for the substances within the finished product.
10.	Are there any obligation for companies using (not manufacturing / importing a product with compulsory BIS certification?	If anyone is importing a product mentioned under the mandatory certification list of BIS but is not having BIS certificate, the customs will not clear the shipment and the product cannot be imported to India without the certificate, this is also applicable for Indian manufacturers. The user has to ensure buying a compliant product.
11.	If I well understood, only the 32 + 12chemicals need a mandatory submission under the BIS?	Yes, 32 chemicals are confirmed to be in the mandatory list. However, date of implementation for 12 chemicals is not confirmed yet, as they are still under proposal stage.
12.	Recently there has been a notification of 6 more chemicals? Any timelines for them to be enforced	There is no timeline as of now as the proposal is still under the discussion.
13.	When the end product (say Gas pipes) is already meeting BIS standard, why the raw material also need certification? It is already tested for conformity to BIS through type test and batch test.	BIS regulation is implemented to ensure the safety of end product that is reaching to Indian consumers. So even if raw material of the product has been certified by BIS then

		also, we need to get BIS certificate for the end product.
14.	Boric acid is a SVHC substance. So, in a pesticide it may be a controlled use. It may be also used as a pigment extender. So, is use also controlled besides product quality?	No, use of chemical is not controlled under BIS, thereby it may have a dual use. However, focus on safety and quality of any substance is regulated under BIS.
15.	What if the end use for Boric is not a pesticide powder, do we need to still confirm to BIS standards, especially if we are importing from outside India?	No matter for what use chemical is being imported to India, if it is under the mandatory certification list of BIS then BIS certificate is required its import.
16.	For product registration for foreign legal entity, how we can provide DIN/TIN, or PAN number as if we see the list of documents required for product registration for the imported products	List of documents available on the BIS portal is combined list considering Indian manufacturer/ foreign manufacturer and Authorized Indian Representative. So, one needs to identify which document is applicable depending upon country of origin of the manufacturer and can be provided to BIS. If more information is required BIS may request for supporting documents.
17.	why are these certain chemicals added to the mandatory list? what is the criterion for a chemical to be added to the list?	BIS is working to upgrade India's existing IS standards. In the process of its upgradation BIS lays emphasis towards specification within the standard to improve the quality of products placed in the Indian market which happens to be one of the key criteria while making the mandatory list.