Recommendations on the Machinery and Electrical Equipment Safety Order

(Omnibus Technical Regulation, 2024)

Introduction

While relying on European textile machinery, the Indian textile industry has prospered. In 2023, India imported for close to 700 M € worth of textile machinery from European companies, The European textile machinery industry is committed to supply India as well as its customers worldwide with machinery of highest mechanical engineering standard complying with the highest safety standards and legislation for the production of high-quality textile materials. The EU textile machinery industry counts over 850 companies and produces machines, parts, and accessories for the whole textile production chain. Their interests are represented by CEMATEX.

Here, CEMATEX's shares its key remarks on the Omnibus Technical Regulation for Machinery Safety regarding weaving and embroidery machinery (No 8 and 9 of First Schedule List).

Welcomed initiatives on machinery safety.

The CEMATEX membership is used to meet the requirements of EN ISO 11111, as these standards have the status of harmonised standards for machine safety in the EU. Therefore, CEMATEX welcomes that India has implemented the ISO 11111 safety standards for textile machinery as Indian standards. That reduces technical trade barriers for integrating European textile machinery technology in Indian textile mills.

Technical Barriers to Trade between EU and India should be limited.

CEMATEX understands the aim of the Omnibus Technical Regulation 2024 of the Indian Ministry of Heavy Industries to secure the safety of workers in the Indian textile industry, though, CEMATEX is concerned that the implementation of the Omnibus Technical Regulation Order, 2024, with regard to textile machinery, will lead to problems in the Indian textile industry caused by delays in supply and delayed commissioning. The first experiences of CEMATEX members show substantial delays at testing and certification bodies result from the expansion to additional products. CEMATEX also believes that mandatory third-party certification of textile machines produced in the EU, compliant with the highest safety standards, creates unnecessary administrative burdens and textile machinery supply shortages for the Indian textile industry in an already difficult international trading context.

The extension of BIS product certification - a mandatory third-party certification - to textile machines made in the EU will increase the costs for machinery for the Indian textile industry. In the EU, textile machines are not subject to third party certification and can be placed on the market with the manufacturer's declaration of conformity with the EU Machinery Directive (2006/42/EC). Although the BIS Certification for weaving and embroidery machines requires

minimal technical effort from European companies in terms of technical compliance, the additional administrative burdens are very time and cost-consuming and harm Indian textile customers.

Recommendations

1. Like all machinery, weaving and embroidery machines are assembled from a large number of parts and components. Some are produced by the machine manufacturer itself; some are sourced with suppliers. Parts and components of textile machinery do not have to pass a third-party inspection in the EU. Components like motors are pre-tested in Europe due to the manufacturer's self-declaration and CE marking and thus additional BIS certification testing doubles the costs without bringing extra benefit. A BIS certification of all parts and components for weaving and embroidery machines will cause a high number of registration cases and overload the BIS testing and certification bodies. Therefore, CEMATEX proposes that parts and components of textile machinery should be excluded from the scope of the Omnibus Technical regulation.
2. For “assemblies/subassemblies” as mentioned in the First Schedule List, CEMATEX reads that as “partly completed machinery” as defined by the EU Machinery Directive. For the same reasons as mentioned above, CEMATEX proposes that assemblies/subassemblies” of EU produced textile machinery should be excluded from the scope of the Indian regulation.
3. As the regulation will apply from August 28, 2025, and BIS states that the certification procedure can be done in six months, it is clear shortages will occur. In addition, the certification procedure foresees on-site verifications of production units and process audits by the relevant entities, but no clear statements are available by whom or when. Therefore, CEMATEX demands for a longer transition period to evaluate BIS certification procedures without putting the supply of textile machinery technology to the Indian textile industry at risk.
4. Lastly, CEMATEX is hopeful the requirement for compulsory third-party certification of textile machines produced in the EU can be reviewed as it is of the opinion it is not in the benefit of the Indian textile industry and its textile workers. It is merely a technical barrier to trade in the WTO sense.

Conclusion

CEMATEX is hopeful that the Indian Ministry of Heavy Industry takes the mentioned impact of the Omnibus Technical Regulation Order, 2024 on the Indian textile industry into consideration and reviews the amendments proposed by CEMATEX. The demands for third party proof of product conformity for textile machines manufactured in the EU, are counterproductive for the growth of the Indian textile industry and a review is appropriate.

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