

Central Marks Department-II

Our Ref: CMD/16:13428 & 14543

2001 04 30

Please find enclosed the minutes of the meeting held on 25 April 2001 during which various points raised by ROs/BOs were discussed for the problem faced during the Certification of Packaged Natural Mineral Water and Packaged Drinking Water. The same is being circulated for compliance.

(O. N. Srivastava)
Director (CMD II)

D & H (CMD II)

To all ROs/BOs

CC to; D & H (CHD)
D & H (FAD)
D & H (PCD)
Sh. A. K. Bahl, QSD

CENTRAL MARKS DEPARTMENT-II

Our Ref: CMD/16:13428 & 14543

2001 04 30

Minutes of the Meeting held on Wednesday 25 April 2001 under the Chairmanship of Shri Satish Chander, ADGM in Room No. 450, Manak Bhavan for discussing various points/difficulties brought to the notice of CMD for processing of applications for IS 13428 Packaged Natural Mineral Water and IS 14543 Packaged Drinking Water.

List of Members Present

1. Shri Satish Chander, ADGM, Chairman
2. Shri D.R. Kohli, DDGC
3. Shri M.A.U. Khan, MDD-1
4. Shri Lajinder Singh, Chemical Department, HQ
5. Shri P.P. Malik, Central Marks Department
6. Smt. Madhulika Prakash, Food and Agriculture Department
7. Sh. A.K. Bahl, quality Systems Department, HQ
8. Shri B. Ram Krishan Rao, Ghaziabad Branch Office
9. Shri Sunil Kumar, Faridabad Branch Office
10. Shri R.K. Bajaj, Central Regional Office
11. Smt. Suneeti Bhasin, Food and Agriculture Department
12. Shri T. Kalaivanan, Petro Chemical Department
13. Shri H.S. Sidhu, Petro Chemical Department
14. Shri P.K. Chadha, MDD-1
15. Shri O.N. Srivastava, Central Marks Department

Item 0 Welcome by ADGM

ADGM welcomed all the officers and stressed the importance of the Certification Marks Scheme for Packaged Drinking Water and Packaged Natural Mineral Water in view of the notification issued by Ministry of Health and Family Welfare. It was mentioned that the industry which according to estimate is worth Rs. 600 to 700 crore business per year was covering a wide range of manufacturing the item from large scale to very small scale or cottage scales units. As per reports the number of units involved is widely varying but it is expected that approximately 250 to 300 units may come up to the required norms for getting BIS Certification Marks Licence. He also mentioned in brief the steps taken by BIS for expeditious processing of application by providing more testing facilities, reduction in marking fee etc. He informed the officers that a number of Court cases has been filed in various States but as per reports available, no general stay has been granted by any court barring few limited stay granted in individual cases. ADGM once again reiterated that application

recorded by 29 March 2001 should be given top most priority and preliminary inspection must be completed by 30 April 2001 (ref Circular No. CMD/16:14543 & 13428 dated 25 April 2001 under ADGM' Signature) so that a decision is taken either to grant the licence or close the application by 15 June 2001. He also emphasized that the daily progress made in applications be reported by Email if there is any change in the status, and a consolidated data must be sent on last day of the week i.e. Friday along with a hard copy to be dispatched by Speed Post or Courier so as to reach to Headquarters on Monday. It is to be strictly followed as weekly report on the progress of pending application and grant of licence has been desired by DG, BIS and every fortnightly by Ministry of Health and Family Welfare.

Item 1. Problems in Certification

The problems discussed (given in bold letters) and decision taken (given in italics) are as given below:

1.1 Recycling of 5 litres and above jerry cans and bottles, its cleaning and sterilization in case of reuse.

It has been decided that the Clause B 8.4.2 and B 8.5 Annex B of IS 14543 and Clause B.6.4.2 of IS 13428 shall be strictly adhered to by the licensee and verified by the officers during the preliminary inspection as well as subsequent periodic inspection.

1.2 Manual filling operation for Packaged Drinking Water/Packaged Natural Mineral Water.

It was decided that the manual filling operations to be permitted, provided adequate precautions have been taken to ensure compliance with Clause B 8.5 of IS 14543 and Clause B 6.5 to IS 13428.

1.3 Variations in Gazette Notification and Indian Standard particularly with respect to requirements, of 'colorless', 'transparent' and 'sterile' and implementation of Amendment No. 3 to both the Indian Standards. Use of polycarbonate bottles as Indian Standard for polycarbonate resins for its safe use in contact with foodstuffs, pharmaceuticals and drinking water is under finalization stage and yet to be printed.

It was informed by FAD that in principle a decision has been taken to delete the word 'Sterile' as appearing in the notification but procedural part is yet to be covered. It was decided that a suitable action on this line to modify Amendment No. 3 which is still under print may be considered by FAD. As regards the implementation of the requirement of "colorless" and "transparent" containers it was decided, that since no value has been given with regard to the transparency and also no test method has been specified, a visual observation in compliance to the requirement may be recorded. As per information received from PCD the standard on polycarbonate resins used for manufacturing bottles is yet to be sent for printing. It was decided that the bottles should be colourless in compliance to the Gazette Notification though the proposed Indian Standard permits the use of pigments and colourants as prescribed in IS 9833.

1.4 Drawl of raw water sample during preliminary inspection in case of Packaged drinking water.

It has been reported that some BO's are drawing samples of water during preliminary inspection, for checking its conformity to IS 10500 as per Clause B.5.4.1.1 of Annex B as per IS 14543:1998. The raw water sample during preliminary inspection for Packaged drinking Water as per IS 14543 need not be drawn. If the raw water is being used for the other purposes like washing and rinsing of container it should be of potable quality.

1.5 Use of UPVC/HDPE/Stainless Steel pipe in the production of Packaged Drinking and Packaged Natural Mineral Water.

All UPVC pipe, HDPE pipe till processing of water may not be objected to however after water is processed the stainless steel pipe shall be used for transferring of the processed water to packing stage.

1.6 Shelf life of Packaged Drinking Water and Natural Mineral Water, keeping quality and frequency to be included in STI.

It was decided not to include the keeping quality requirement for Packaged Drinking Water and Natural Mineral Water in the STI as it has not been specified in the specification and it is the responsibility of the manufacturer to declare the "best before....." time period on the container. However, it was felt that BO while carrying out preliminary/periodic inspection, the system adopted by applicant/licensee to study and verify declaration for the period "Best before...", on the Packaged Drinking Water and Packaged Natural Mineral Water may also be checked and feed back may be provided to CMD within 6 months.

1.7 Grant of permission for getting the sample tested from outside lab for the requirement of Zinc as KCN is required to be used and stored which is a toxic and hazardous chemical.

It has been decided that frequency may not be changed at present. However, ROs/ BOs may be requested to send us the data for 6 months. Based on the values observed for the requirement of the Zinc on factory and the market samples, the subject will be reviewed after 6 months based on the feed back from RO/BOs.

1.8 Hygienic condition, verification and reporting procedure.

CMD Circular Reference No. 16:14543 dated 02 March 2001 shall strictly adhered to.

1.9 Pesticidal residue to be tested for all the 29 referred standard as per Annex N of IS 13428 or for 7 referred standard where water has been included in the title.

1.10 Most of the test methods specify titration methods for determination of various parameters which is time consuming whereas instrumental methods are being followed by various industries.

Keeping in view the work load, it has been decided that as per practice being followed for operation of product certification scheme in similar cases the instrumental methods of analyses employed by our licensees to meet the requirement of expeditious testing of routine analyses should be permitted. However, the unit should also have testing facilities as per the test procedure given in the standard and ensure that the results obtained by instrumental methods of analyses are comparable with the methods specified in IS. Further in case of any dispute the method specified in Indian Standard will be relevant.

1.11 Revised marking fee not communicated to all licensees and applicant. Refund of balance marking fee to all licensees who have paid marking fee in excess.

The revised marking fee may be communicated to all licensee and applicants if not done so far. The credit note may be issued to all licensees who have paid marking fee in excess.

1.12 Procurement of 4 market sample one in each quarter and 3 periodic inspection during one operative year preferably once in 4 month.

It was decided that close monitoring of the operation of licences should be carried out and each BO must ensure a periodic inspection once in 4 months, preferably every quarter in the first 6-8 months of the operation of the licence and also drawl of one market sample every quarter (avoiding drawl of sample from

dispatch point). These samples shall be subjected to testing for the requirements as specified in proposal for fixation of marking fee already circulated.

1.13 Sending data to CMD for monitoring the position of pending application and grant of licence.

Guidelines given under circular No. CMD/16:14543 & 13428 dated 25 April 2001 sent under ADGM signatures shall be followed.

1.14 Use of silica crucible in place of platinum crucible for determination of iron.

It was informed by D & H (CH) that the request for use of the silica crucible in place of platinum crucible has not been agreed to by CPCB. Therefore, all RO/BOs must ensure the availability of platinum crucible with the applicant.

1.15 Policy guidelines, circulars on Packaged Drinking Water/Packaged Natural Mineral Water.

It was stressed that all the policy guidelines and circulars must be followed strictly.

Item 2 Field Experience

Officers who have carried out some of the preliminary/periodic inspection also shared their experience which could be useful for officers going for such visits. These are given below:

1. In one of the unit the management informed that ozonization was being carried out in two overhead tanks. When the officers verified the system for ozonization was not connected in one of the tank.
2. The overhead tank storing water after processing left scope for microbial contamination in the treated water just before packing.