

9.9.2025

Mr. Ashutosh Agarwal,
Director - Legal Metrology,
Department of Consumer Affairs,
Government of India

**Subject: Request for Relaxation under Rule 33 of the Legal Metrology
(Packaged Commodities) Rules, 2011, in Light of GST Reforms**

Hon. Director,
Greetings from Retailers Association of India (RAI)!

RAI is the unified voice of Indian retailers working with all the stakeholders for creating the right environment for the growth of the modern retail industry in India. It encourages, develops, facilitates and supports retailers to modernise and adopt best practices that will delight customers. RAI is the premier body of Retailers in India, having around 14000-member establishments, including large and small retailers in the country, representing approximately 700,000 retail stores.

As you are aware, the change in GST rates, effective from **22nd September 2025**, necessitates revision in the **Maximum Retail Price (MRP)** of numerous products currently held in stock by retailers. These products, although **manufactured/packed/imported prior to 22nd September 2025**, are still unsold and are subject to the revised tax structure.

We, the Retailers Association of India (RAI), humbly submit this representation for your kind consideration. Following the implementation of GST reforms, your department has already demonstrated proactive measures by permitting manufacturers, packers, and importers to declare revised MRPs on unsold stock and extending relevant timelines. We appreciate this initiative, which benefits consumers and supports the retail sector.

In continuation, we respectfully request the Authority to invoke Rule 33 of the Legal Metrology (Packaged Commodities) Rules, 2011, and grant relaxation from the requirements under Rule 18 for revision of Maximum Retail Price (MRP). Hence, hereby we request you as mentioned under:

Provide us an exemption/waiver from the mandates as follows and the assurance for the same is provided below:

Point 1.

Requirement of strike off the price tag by sticking/stamping/online printing, in case of **revision of the Maximum Retail Price (MRP).**

Point 2:

Exemption from **Newspaper publication and circulation of notices to dealers, the Director in the Central Govt, the Controllers of Legal Metrology** in the States and Union Territory (various authorities).

In the light of the above, we assure you the following:

Point 1

1. **Bills/Invoices will transparently reflect GST discount (difference in the original MRP and the revised MRP post-GST changes,) clearly showcasing the reduced GST as notified by the Government.**
2. **There will be proper display within the store informing customers about the revision of prices due to the change in GST rate.**
3. **Store staff will be adequately trained to communicate both the old and revised MRPs to customers, ensuring that the GST benefit is passed on to the consumer.**

Point 2:

The GST reform has received extensive publicity across various media channels, ensuring public awareness. Additional newspaper publications would result in unnecessary duplication without incremental benefits to informed consumers. Waiving this requirement would facilitate faster compliance and timely revision of MRPs. Granting this relaxation of newspaper publication would ease compliance burdens on the retail industry while protecting consumer interests.

Furthermore, it is worth to note that Manufacturers hold substantial stocks of pre-printed packaging with MRPs finalized before the GST rate change. Forcing reprinting or re-lamination would lead to significant financial losses and unnecessary waste. We propose allowing the continued use of existing packaging, provided that revised (reduced) prices are transparently reflected in billing and communicated clearly in-store. This ensures consumers receive the GST benefit without burdening the industry or the environment.

RAI remains committed to collaborating with your department to ensure smooth reform implementation that benefits all stakeholders.

We appreciate your consideration and look forward to your approval.

Warm Regards,
For and on Behalf of Retailers Association of India,



Gautam Jain, Director – Advocacy, RAI