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A Ryan LLC Affiliate

TRADE AND PRODUCT REGULATORY ALERT

June 03, 2026

Recent changes under Legal Metrology
law in relation to pre-packaged
commodities

Recent changes under Legal Metrology law in relation to pre-packaged commodities

The Government has notified several structural shifts under the legal metrology law governing labelling of pre-packaged commodities in India. The Jan Vishwas (Amendment of Provisions) Act, 2026 ('Amendment Act'), notified on April 8, 2026, intends to decriminalize compliance provisions and facilitate the ease of doing business. Alongside this, recent advisories and rule amendments introduce a mix of new compliance requirements and operational relaxations.

The key highlights of these regulatory changes are summarized below:

A. Changes introduced vide the Jan Vishwas (Amendment of Provisions) Act, 2026

Implementation date: May 1, 2026

1. Regarding powers for inspection, seizure etc. of Legal Metrology officers

- Any search and seizure operation under Legal Metrology Act, 2009 ('LM Act') will be deemed to be under a lawful warrant
- The relevant officer may issue an 'improvement notice' specifying:
 - Grounds for believing non-compliance under LM Act
 - Matters which constitute failure to comply at a person's end
 - Measures to be undertaken to secure compliance

- Direction to undertake measures within a 'reasonable period'
- Failure to comply with improvement notice may lead to cancellation of registration/ approval

2. Amendments in relation to penal implications in case of non-compliances under LM Act: Refer *Annexure*.

3. Compounding of offences

- Removal of reset clause for getting an offence compounded as 'first offence' after every 3 years
- Process in relation to initiation of court proceedings:
 - No cognizance of offence by Court, expect on written complaint by relevant Legal Metrology officer
 - Trial of offences and recovery of fines to be as per procedure laid down in Bharatiya Nagarik Suraksha Sanhita, 2023
 - An appeal from Controller may be tried by any officer not below the rank of Joint Secretary specially authorised in this behalf by that Government

4. Revision of fines and penalties: The Amendment Act contains provision for increment of penal amount by ten per cent of the minimum amount of fine or penalty, after expiry of every three years from date of commencement of Amendment Act

B. Implementation date for additional compliance for e-commerce operators

The Government *vide Notification G.S.R. 312 (E) dated April 27, 2026*, has notified July 1, 2027, as the implementation date, in relation to a mandatory requirement for e-commerce operators. As per the relevant provision, every e-commerce entity offering imported product for sale needs to ensure that product listing of such imported product contains a searchable and sortable filter specifying the country of origin.

C. Advisory on using customary units alongside Standard SI Units

The Government has recently issued an advisory *vide* Letter Number I-9/1/2026-W&M Section dated May 18, 2026, relating to use of customary units alongside standard units under legal metrology. It has been clarified that use of customary units (such as inches, feet, dozen etc.) along with standard units (like metre, litre, kilograms etc.) under International System of Units (SI units) is permissible. This is subject to the following conditions:

- The corresponding standard SI unit legally recognized under legal metrology law is declared prominently
- The customary unit needs to be provided as additional information and not as a substitute for the standard unit
- In case of any inconsistency or dispute, the declaration made in standard SI units shall prevail
- The supplementary declaration should not mislead consumers or create ambiguity regarding the quantity, dimension etc.

The advisory has provided certain illustrations in this regard, such as:

- 1 metre (39.37008 inches)
- 12 numbers (1 dozen)

- 139 cm (55 inches television screen size)

D. Time of labelling and compliance related amendments under LMPC Rules

The Government has issued the Legal Metrology (Packaged Commodities) Third Amendment Rules, 2026, *vide Notification No. G.S.R. 418(E)* dated *May 29, 2026*. These rules come into force on the date of their publication in the Official Gazette. The key aspects of these amendments are summarised below:

1. Permissibility to undertake labelling activities at AEO warehouses:

- Importers will be allowed to make mandatory declarations at the bonded warehouses of Authorised Economic Operators (AEO) Tier-2 and Tier-3 certified operators in India
- Retail packages must bear all mandatory declarations prior to clearance from such bonded warehouses

2. Compliance related changes

- **Disclosure of responsible director:** Applications for registration will now explicitly include the name of the Director of the company who is responsible for violations under the Legal Metrology Act, 2009
- **Annual mandatory updates:** Companies or firms will be required to update its details on an online portal (*Functionality will be activated*). This annual update will include changes to particulars including, address, country of origin, products (along with their numbers) to be manufactured, packed, or imported during the previous year
- **Validity of registration:** The registration certificates issued shall remain valid until they are cancelled

Annexure

Particulars		Implications under existing provisions of LM Act	Implications post implementation of Amendment Act
Quoting or publishing, etc., of non-standard units under Section 11 of LM Act	First offence	Up to INR 50,000	Warning with improvement notice
	Second offence	Up to INR 1,00,000	Up to INR 50,000
	Third and subsequent offence	Up to INR 2,00,000	Between INR 1,00,000 TO INR 2,00,000
Supply of any pre-packaged commodity not conforming to declarations required under the LM Act	First offence	Up to INR 25,000	Warning with improvement notice
	Second offence	Up to INR 50,000	Up to INR 5,00,000
	Third and subsequent offence	Between INR 50,000 to INR 1,00,000 or imprisonment up to one year or both	Between INR 25,00,000 to INR 50,00,000
			<i>(The above liability specifically extends to digital modes of sale such as e-commerce platforms, online marketplaces or any other digital or electronic means including electronic service providers facilitating such sales)</i>
Breach of any provision (other than those related to declarations) under Legal Metrology (Packaged Commodities) Rules, 2011		Up to INR 5,000	Up to five lakh rupees and suspension/ revocation

DHRUVA INSIGHT

The recent changes under Legal Metrology law represent a soft reboot by altering the liability and compliance frameworks. The intent is to create a balanced ecosystem that promotes trade facilitation while ensuring consumer protection.

With these changes, business should proactively align its operational practices, relating to MRP labelling, with 'Legal Metrology 2.0' to ensure continued compliances and avoid unwanted disruptions in its supply chain.

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