BUREAU OF INDIAN STANDARDS
(CENTRAL MARKS DEPARTMENT - I)

Our Ref: CMD-I/2:12:7 **25 February 2026**

Subject: Guidelines for market surveillance during operation of licence for the conformity assessment Scheme – I of Schedule – II of BIS (Conformity Assessment) Regulations, 2018

1. This document stipulates the guidelines for surveillance by BIS w.r.t. monitoring operation of product certification licences and checking conformance of product available in the market as per applicable Standard(s). These guidelines are to be read in conjunction with the BIS Act 2016 and Rules, Regulations framed thereunder. In particular, the provisions of surveillance are addressed in sub-paragraph (6) of paragraph 3 of Scheme-I of Schedule-II of BIS (Conformity Assessment) Regulations, 2018.

2. BIS undertakes various surveillance measures for its product certification scheme which aims to check conformance of certified products to applicable standard(s). These surveillance operations also provide inputs & opportunities for improvement to licensee. The various types of conformity assessment surveillance activities are as follows:

(1) Pro-active surveillance

(i) Pre-market surveillance activities (Addressed in document CMD-I/2:12:6)
- **(a)** Factory surveillance visits
- **(b)** Pre-despatch inspection visits

(ii) Post-market surveillance activities (Addressed in this document)
- **(a)** Procurement of product samples from market
- **(b)** Feedback from buyers

(2) Re-active surveillance (Addressed in document CMD-I/2:12:6)

(i) Surveillance based on consumer complaint or feedback

(3) Dynamic surveillance (Addressed in both this document and CMD-I/2:12:6)

3. A dedicated nodal department, named Certification, Surveillance and Monitoring Department (CSMD), has been set up at BIS HQ for effective monitoring of inspection and surveillance in product certification activities of BIS, reporting to DDG (Surveillance and Monitoring). CSMD shall be responsible for planning and preparation of surveillance plans across India, i.e. surveillance of certified goods bearing Standard Mark available in the market. CSMD shall also be the single point of contact for the activities related to market surveillance including the following:

(1) Planning and communication about market samples to be procured by concerned AGENT(s).

(2) Providing information and ensuring coordination on the above with concerned ROs/BOs/market surveillance cell of BOs

(3) Planning and communication about market samples to be procured by ROs/BOs

(4) Monitoring of surveillance activities, including review of achievement of targets and quality of surveillance

4. The market surveillance activities of foreign manufacturers shall be planned and prepared by Foreign Manufacturers Certification Department (FMCD) with approval of the competent authority. For collection of samples from market in India, FMCD may raise a request to CSMD to utilise the services of AGENT(s).

5. Pro-active surveillance:

(1) Market surveillance:

(i) Procurement of product samples from market: Generally, two samples per year may be procured for each licence from the market for independent testing in third party laboratory(ies) subject to risk based assessment & dynamic surveillance. Product wise guidance document on surveillance amenability (MS/DP/ Feedback/Organised Buyers) and frequency may be referred for post-market surveillance. Subject to risk based assessment & dynamic surveillance, this frequency may be enhanced for non-compliant manufacturers. Based on compliance level of manufacturer in previous two years, the market surveillance frequency may be enhanced to three/four per year.

General

(a) BIS shall procure market samples of the product bearing Standard Mark taking into account risk based assessment on the basis of product category, overall product compliance level and individual performance of licensee. Additionally, various other relevant factors like seasonality of the product, available information about production schedule, consignee list, adherence to principle of rotation etc. shall be followed.

(b) Samples of certified products shall normally be purchased from the open market. The same may also be procured from organized buyers or from any point in the supply chain including port of entry. In case, it is not possible to procure sample(s) from any point in the supply chain, it may be drawn from despatch point by the certification officer(s) along with relevant details of consignee, invoice no and date etc.

Consignee details

(c) The licensee shall submit month-wise production and consignee details (with complete address and quantity supplied) through the online portal on quarterly basis. The ROs/BOs shall check the adequacy and completeness of such information submitted by the licensee on the online portal.

The ROs/BOs shall endeavour that the licensee adheres to regular submission of these details. In case any issues are expressed by the licensee for a particular licence especially when the number of such consignee is too large, then based on assessment about sufficiency of consignee data for effective market surveillance operation, Head (BO) may by recording reasons authorise relaxation in such particular cases.

The licensees shall also be advised for appropriate regular updation of information like deletion of obsolete consignee and addition of new consignee etc.

Planning

(d) ROs/BOs shall prepare market surveillance plans and execute through market surveillance cells. AGENT(s) appointed at BO level, if applicable, are for assistance in preparation and execution of market surveillance plans.

Execution

(e) Market surveillance is responsibility of certification officers of BIS. However, certification officers may plan and execute the activity with the help of appointed AGENT(s) or staff of BIS. For drawl of samples from dispatch point, services of only certification officer(s) to be utilised. The BOs shall impart adequate awareness, training and guidance to its staff and AGENT(s) for the same before utilising them for drawl of sample(s).

(f) For logistics purposes like transport, delivery, packing etc., ROs/BOs may use appropriate means (as per applicable rules) like:

- Hiring of transport vehicle(s) for sample(s) procurement
- Engaging agency(ies) for packing and despatch of sample(s) to designated laboratory(ies)
- Samples drawn by certification officer(s) from dispatch point should preferably be carried along. Wherever it is practically not feasible, the samples may be handed over to the manufacturer with clear instructions for it's dispatch to the concerned laboratory within 7 days.

Market surveillance report by ROs/BOs

(g) The BOs shall be required to submit report (upto Part-I) for each market surveillance through the mobile app. Any instances of violations of the BIS Act, 2016 observed during market surveillance activity shall also be reported for necessary action by ROs/BOs.

(h) The details about adequacy and completeness of information about samples like its quantity, shelf life, grade, type, size etc. as per scope of licence shall be verified before forwarding the sample(s) to the market surveillance cell for further processing. A guidance document about usage of said mobile-app is enclosed as ***Annexure-I***.

(i) The preference mechanism for selection of location by BOs for purchase of sample is as below:

Preference	Description of Scenario	Guidelines for sample purchase
I	Products are sold in various states including the state where licensee's manufacturing facility is located.	Plan and execute purchase of samples preferably from a market located in different state.
II	Products are sold only in same state where licensee's manufacturing facility is located.	Plan and execute purchase samples preferably from a market located in different district as that of licensee.
III	Products are only sold in same district where licensee's manufacturing facility is located.	The BOs may plan for purchase the sample from a market located within the same district.

Note: BOs shall ensure that atleast one market sample is purchased/procured from a state different than where licensee is located, unless BO verifies that the licensee has not supplied any material with Standard Mark outside the State.

Submission of market surveillance report and market surveillance cell(s)

(j) The official purchasing sample (including personnel of the AGENT(s)) shall be required to submit report (Part-I of Annexure-I) for each market surveillance through the mobile app. Any instances of violations of the BIS Act, 2016 observed during market surveillance activity shall also be reported.

(k) Each BO shall have a market surveillance cell. One officer of the BO shall be designated as incharge of the cell with necessary support of other officer(s), staff and personnel of the AGENT(s) appointed at the BO. With the approval of Head (BO), more officer/staff(s) may be designated to handle work at market surveillance cells. The market surveillance cells will be handling the receipt of market samples deposited by staff, AGENT(s) and BIS certification officer(s). The cell shall also be responsible for verification of sample details, safe handling of samples including its proper and secure packing for avoiding any damage in transit, coding and sealing of samples etc. and its safe dispatch to third party laboratory(ies) for independent testing. The market surveillance cell shall process for acceptance/non-acceptance of market sample within three working days.

(l) The details about adequacy and completeness of information about samples like its quantity, shelf life, grade, type, size etc. as per scope of licence shall be verified before acceptance/non-acceptance of market samples. The market surveillance cell may seek any clarification on submitted market surveillance report(s) and resolve it for acceptance or non-acceptance within seven working days from the date of submission of sample.

(m) An assessment compliance (Part-II of report) about marking details, feedback, misuse etc. shall be indicated in the online reporting portal/app by the cell. The laboratory selection and test request generation (Part-III of report) will be undertaken through the Laboratory Information Management System (LIMS) portal integrated in the online portal/app. Dispatch of samples for testing purposes shall be ensured within seven working days from the date of receipt of samples.

Test request generation by market surveillance cell(s)

(n) Market surveillance cells shall process the samples for generation of test requests and dispatch of samples for testing in third party laboratory(ies). The complete market surveillance report (including conclusion Part-IV submission by market surveillance cell) shall be forwarded to concerned BO for further necessary action.

Note: In case, the grade/type/class/variety etc. is not marked on the sample (where it is a requirement of labelling and marking as per Indian Standard/Scheme of Inspection and Testing SIT), such samples may be got tested/evaluated against the most stringent grade/type/class/variety etc. covered in the Standard, unless the applicable grade/type/class/variety etc. is apparently distinguishable and technically appropriate.

Review and monitoring

(o) CSMD shall monitor the market sample procurement performance of the ROs/BOs on quarterly basis and share these findings with ROs/BOs to ensure market surveillance coverage of all certification licences.

(ii) Feedback from organised buyers:

(a) For products listed as '*Feedback*' in the product-wise guidance sheet, BOs shall obtain feedback about certified products from consumers preferably from organised buyers in the Government sector or bulk quantity buyers.

(b) Additionally, even for products listed as either '*MS or FT or DP or OB*' in the product-wise guidance sheet, BOs shall endeavour (if feasible) to obtain feedback about certified products from the consumers. In such situations, if information about supply of products bearing Standard Mark to organised buyer(s) is/are available on the consignee list uploaded by the licensee on online portal, the BOs shall seek feedback on satisfaction about the product. A template for guidance is enclosed as ***Annexure-II***.

(iii) The BOs may also plan and carry out market surveillance in their areas of jurisdiction for any violations of provisions of the BIS Act, 2016 and quality control orders issued under the BIS Act. The follow-up actions shall be taken in accordance with the guidelines issued by Complaint Management and Enforcement Department (CMED).

6. Post surveillance activities:

(1) The BOs shall ensure appropriate follow up for all surveillance activities based on review of reports (market surveillance visit reports, Test reports from labs etc.) as per laid down provisions of BIS Act 2016 and Rules, Regulations framed thereunder and guidelines issued for non-conformity of products and unsatisfactory performance of licence.

(2) Any instance noticed which casts doubt on ethics and integrity of the AGENT(s) shall be reported and submitted by the Head BO to DDGR for further appropriate action.

7. Dynamic Surveillance:

(1) The review of surveillance activities for a licensee may be used as an input to risk based analysis. BOs may plan drawl of additional samples from market for non-compliant manufacturers.

8. Code of ethics:

(1) The certification officers of BIS shall adhere to Central Civil Services (Conduct) Rules, 1964. The AGENT(s) and its personnel shall also uphold the commitments of BIS so as to maintain the trust and respect of its stakeholders and the public at large through unquestionable integrity, honesty, behave professionally, objectively and ethical business conduct. A code of ethics guidance document is enclosed as ***Annexure-III***.

Annexure-I

Guidance on App based Market Surveillance Report

The market surveillance allocated to a CO/BIS staff/Agent will reflect in Market Surveillance Assigned section after logging in the application. After purchase of sample the CO/Agent will select the name of licensee/firm and proceed to fill the report. The report is divided in five parts. Each of these sub-parts and individual fields are explained below:

Part 0
Photograph and Geo-tagging

This part of the report will be filled in the market during the process of purchase of sample.

Photograph of sample: The CO/BIS staff/Agent is required to capture and upload images of the sample drawn by them. The mobile app is designed with a camera button which is to be used for taking the images. The captured images should include all the parts of samples. If available, the details of Manufacturing Unit and ISI mark on the sample may be captured in the images.

Surveillance ID: (System generated)

Part I
Procurement of Market Sample

This section will appear as pre filled with information from manakonline server. Details such as Firm name, Validity of license, Indian Standard & Product for which the license is operative, variety (scope of license). The visiting CO/BIS Staff/Agent is requested to verify the details marked on sample/packaging with the details displayed in the mobile app.

Licence No.: CM/L number granted to the firm will be pre-populated in the app.

Firm Information

Firm Name: Name of Firm will be prefilled. **District:** Prefilled District where the firm is located

Licence validity: This field will display the last date till which the license is operative

Status: [Operative/Suspended/Deferred/Expired/Cancelled/Applicant/Others] – Current status of the license will be displayed in this field.

IS: The Indian Standard against which the license has been granted.

Product: This field shows the Product for which license has been granted.

Variety: – The scope which at present is approved for the license. Varieties covered at the time of Grant of license and varieties included during the operation of license both together makeup the scope of a license.

General Information

1. **Date of Market surveillance:** The date on which the market surveillance has been appointed to visiting CO/BIS Staff/Agent is to be selected against this field. The app will show the

current date in this option by default. In case visit is scheduled for multiple days, the CO/Agent can select multiple dates using the calendar option.

2. **Name & Designation of Certification Officer (CO)/Agent:** As the CO/ BIS Staff Agent will login to the app using his/her credentials these details will appear automatically in the app. In case the CO/ BIS Staff /Agent is accompanied by a second CO/ BIS Staff /Agent, name of designation of second officer is to be filled in this section.

3. **Sample purchase Details:**

Sample Description: A brief description of purchased sample is to be filled in this section. The quantity of sample purchased in terms of units, weight, dimension, size, volume etc., as applicable, has to be provided. Further details available on product or packaging such as Batch No., Grade/Rating/Type/Variety, Date of Manufacturing, Serial Number etc. are to be filled in the description field.

Name of sales outlet: Name of the Shop/Outlet/Store from where the sample has been purchased is to be filled in this field.
Address: Name of the Shop/Outlet/Store from where the sample has been purchased is to be filled in this field.
City: In this field the City/District where the sample has been procured is to be entered.
Invoice/Bill No: In this heading, CO/ BIS Staff /Agent will mention the Serial number or Identification number of bill or invoice issued by shop/outlet/store for the purchased samples.
Cost of sample in Rupees: The total cost paid towards buying the sample as mentioned in the invoice/bill is to be filled in this section.

4. **Any other observation/comments**:

This field is provided to record anything which the CO/ BIS Staff /Agent would like to bring to the notice of BO. Any sample where the misuse of ISI mark is suspected is also to be reported to BO through this section.

After completing the above fields, the report will be submitted using the Submit button.

PART II
Review of Markings on Sample/Packaging

Once the sample purchased from market is deposited at Branch Office the market surveillance cell will take up the further processing of received sample. This part of the Market Surveillance report is to be filled on Manakonline portal/app. Entries pertaining to the verification of sample before preparation of test request are given in the sub sections of this part of report.

5. **Name & Designation of Certification Officer (CO)-** This section will capture the name and designation of the officer who is processing the received sample. The portal will auto fill these details based on allocation of the sample to concerned officer.

6. **Verification of Packaging and Marking:** This section is subdivided into seven subsection which are explained bellow.

(a) Nature of packing as declared & satisfactory as per IS where specified: For applicable products where the standard prescribes packing material as requirement the same should be verified and reported against this section.

Example 1: Cl. 10.1 of IS 269:2015 (Ordinary Portland Cement) prescribes the type of bags allowed for packing of cement. Thus the packing of received sample for this product is to be checked and suitable option is to be reported.

Example 2: Cl. 6 of IS 14543 (Packaged Drinking Water) provides requirement of packing. Here the licensee is required to ensure compliance of packing materials given in the standard to the respective standards.

(b) Check marking on article as per IS & SIT and report conformity: This section requires compliance to the marking clause of ISS/SIT. The CO is required to verify and report whether all the details mandated to be marked on the product as per the marking clause of IS/SIT are being followed by the licensee. The legibility of marking is also to be kept in mind while reporting.

Example 1: Cl. 11 (marking) of IS 269 (Ordinary Portland Cement) requires the manufacturer to mark 9 items on each bag/drum of Cement. Batch No. has to be marked in the format of Weak/Month and Year in BLACK colour only.

Example 2: Cl. 3.2.1 of SIT of IS 14543 (PDW) prescribes requirement of size of ISI mark to be used on the product to ensure legibility. Thus the visiting CO/Agent has to verify the dimension of ISI mark in addition to requirements of marking clause.

(c) Check method of marking: The CO/Agent has to specify the means of marking employed by the licensee in the text box provided. Some examples of method of marking are, Printing, Stencilling, Moulding, Embossing, Labels/Stickers, Laser marking, and Etching etc.

(d) Form of label(s): Specify the format of label, if any affixed on the products.

(e) Batch or Code numbering for identification: The Batch or Code No. available on the sample or packaging has to be checked and entered in the text box. If discrepancies are observed in these details, remarks to be given in the provided text box.

(f) Information about misuse of ISI mark: CO is required to confirm that the variety(ies) of received sample on which ISI mark is being used by licensee are covered in the existing scope the licensee. Any observed non-compliance is to be reported.

Cases where date of manufacturing printed on label/packaging falls during a period when the license was not operative or samples bearing ISI mark manufactured after expiry of a license is available in market also constitute misuse of ISI mark.

There is a possibility that samples bearing ISI mark without CM/L number or without IS number are collected from market. Also it may so happen that the manufacturing unit address mentioned on sample/packaging is not matching with the address for which license has been granted.

All such situations mentioned above may be investigated for further suitable action(s). The CO is required to give remarks in such cases and record his/her observations in the text field.

Such samples are to be brought to the notice of Head BO & dealing officer for appropriate action(s), including enforcement actions, if any.

(g) Any other: Any other information relating to sample which the CO wishes to record can be entered in this field. For example observations on received samples such as inadequate quantity, damaged sample etc. can be reported in this field.

7. Provision for raising query and receiving responses from BO (multiple times)

This section is to be utilised for communicating with the Agent (if applicable) who has drawn the sample and the BO. Any observations/clarifications required from the agent is to be sought using this section. The response of the agent will be received through this section. Multiple queries can be submitted by the CO using this facility.

PART III
Test Request

8. Product sample for Independent Test: – Except for the samples categorized as misuse of standard mark for all other sample the CO will select Yes in this option and proceed to prepare the test request.

On selecting Yes, the test request preparation module will open. This section starts with upload provision which is to be used for uploading declarations required for testing of samples. For example drawings and declaration on variety of sample is required for testing of sample of Tyres.

Sample Details: The CO has to select applicable requirements related to the sample from the drop down options provided in this section. Wherever entry of a text is required provisions have been made in the application. In the date of manufacturing field the available date/month/week is to be filled. If complete date is applicable and same is required for calculating the shelf life it is to be entered in the format DD-MM-YYYY. The CO will affix duplicate pre-printed QR codes, one on sample and second on packaging, and scan the same in the mobile app. Sample codes will be auto generated by the system. CO is not required to write any physical code on the sample. In case the QR code is not being scanned in the app, its unique number is to be filled in the application.

Sample code will be auto generated by the portal and communicated to LIMS module.

PART IV
Conclusion

9. Any other observation/comments: Any information relating to sample which the CO wishes to record can be entered in this field. For example observations on received samples such as inadequate quantity, damaged sample etc. can be reported in this field. In case the sample is not being sent to lab for some reasons, such information can also be recorded here.

10. Conclusion: The CO has to choose his/her final assessment of market surveillance by selecting from Satisfactory/Unsatisfactory/Any Other. The assessment is to be primarily based on examination of Labelling & Marking details available on the sample.

Annexure-II

Our Ref.: .....BO/CML- Dated:
M/s

Dear Madam/Sir(s),

1) As you are aware, the Bureau of Indian Standards (BIS) is the National Standards Body of India working for harmonious development of standardisation and conformity assessment activities in the country.

2) Conformity assessment activities of BIS aim to serve the consumers through quality assurance of the product to applicable Indian Standard(s) through certification licence granted to manufacturers to use or apply Standard Mark ( ) on their products.

3) In this regard, M/s ..... is holding a valid licence to use the Standard Mark on their product ……. as per IS .....

4) We are given to understand that the above said licensee has supplied the above mentioned product with Mark to you. We will appreciate your feedback with respect to the quality of the above said product supplied to you by this licensee.

5) Please send your feedback about the quality of the product in the enclosed format, either through post or by email to ..... within the next 30 days.

6) You may also please feel free to write to us any time, in case it is observed that the quality of any marked product supplied to you by any licensee does not conform to the relevant Indian Standard(s).

Thanking you,

Yours faithfully,

Encl.: Format for user feedback

Format for user feedback on ISI marked product

Your Ref : .....BO/CML – Date :

Kind attn: Head, ... Branch Office ....bo@bis.gov.in

Bureau of Indian Standards,

BO Address: .....

1	Manufacturer	
2	Brand name (if any)	
3	Details of product bearing ISI Mark (IS, CML, Batch No, Date of manufacturing etc., if available) (Separate sheet for more details can also be attached)	
4	Are you satisfied with the product	**Yes / No**
4a	Reason(s) of being not satisfied with the product (if applicable)	
5	Any other feedback or suggestion(s)	

Signature: .....

Name: .....

Designation: .....

Contact (Phone/E-mail): .....

Annexure-III

Code of ethics for BIS certification officers and AGENT(s) for market surveillance

While discharging its duties under the BIS Act 2016, BIS is committed to maintain the trust and respect of its stakeholders and the public at large through unquestionable integrity, honesty, behave professionally, objectively and ethical business conduct.
The AGENT(s), including personnel involved, appointed for BIS shall uphold dedication to the basic corporate ethic. In addition to the requirements of conduct stated herein, the AGENT(s) shall comply with the applicable national and state laws and regulation applicable to them in the territory they are working. The certification officer of BIS shall also adhere to this code of ethics, as applicable, in addition to the Central Civil Services (Conduct) Rules, 1964.

Professional Behaviour

(i) The AGENT(s) shall act honestly, in good faith and in the best interests of BIS, not engaging in conduct likely to bring discredit upon the Bureau

(ii) **Impartiality**- AGENT(s) shall disclose their past and present association with the entity whose sample is to be drawn or the group of companies to which it belongs.

(iii) **Conflict of Interest** - AGENT(s) shall inform BIS of any conflicts, of potential conflicts of interest, arising out of fulfilment of his/her duties and the responsibilities of an AGENT. The agent shall not collect samples of those organizations where he/she has been engaged as Consultant in at least the past 2 years. Any association with the organization whose samples are to be collected shall be brought to the notice of the concerned Branch Head of the BIS.

(iv) The AGENT(s) shall not interact with the manufacturers (BIS applicants/licensees) under any circumstances.

Confidentiality

(v) AGENT(s) shall remain bound by confidentiality even after opting/retiring from the BIS's panel.

(vi) AGENT(s) shall contact the concerned Branch Head of the BIS if he/she is in doubt with regards to a specific business conduct question or would like to report an infraction.

(vii) AGENT(s) shall not market their association with BIS for gaining work or misuse their position.

Objectivity

(viii) AGENT(s) shall act impartially ensuring that he/she is independent in judgement and actions and takes all reasonable steps to be satisfied as to the soundness of all decisions taken.

(ix) AGENT(s) shall use due care and diligence in fulfilling its functions and exercising any powers attached therewith.

BIS will promptly investigate any alleged non-compliance including this Code of Ethics. Each of the personnel of the AGENT(s) working for the project shall adhere to above guidelines.