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Section I : Healthcare, Life Sciences & Public Health Policy

1 Strengthening India’s COVID-19 Emergency Response with Policy & Data Innovation

Context :

During the peak of the COVID-19 pandemic, India’s Ministry of Health and Family Welfare (MoHFW) faced the dual challenge of real-time disease surveillance and rapid vaccination rollout.

The Office of the Joint Secretary for Emergency Medical Response needed expert support to manage the national COVID war room, strengthen data analytics for policy decisions and design digital systems such as the CoWIN platform to enable large-scale vaccine administration.

Our Approach :

We led a multidisciplinary team to provide end-to-end policy and technical support:

- Embedded analysts within the MoHFW COVID war room to build real-time dashboards for case tracking, forecasting, and resource allocation.
- Supported disease surveillance and research functions, integrating epidemiological data with actionable policy recommendations.
- Advised on the CoWIN application’s workflow design, including registration, scheduling, and verification modules, while assessing opportunities to embed AI and machine-learning tools for predictive modelling and operational efficiency.
- Assisted in drafting risk-communication strategies to inform state governments and the public with timely, evidence-based updates.

Outcome :

The engagement strengthened the Ministry’s pandemic response capabilities and accelerated the national vaccination drive. Enhanced analytics enabled faster decision-making on containment measures and resource deployment, while the refined CoWIN workflow became the backbone of India’s vaccination programme, supporting over a billion administered doses.

The collaboration demonstrated how targeted policy and technology expertise can translate into effective, scalable public-health outcomes during a national emergency.

2 Advancing India's National Digital Health Mission

Context :

To modernize healthcare delivery and create a unified digital ecosystem, the Government of India launched the National Digital Health Mission (NDHM).

The initiative sought to build national registries for citizens, hospitals, and healthcare professionals, while encouraging states and private stakeholders to adopt interoperable data systems. Translating this vision into a scalable, operational programme required detailed policy design and a clear strategy for nationwide participation.

Our Approach :

We provided strategic and technical support to the Ministry of Health and Family Welfare to accelerate NDHM's rollout by:

- Policy & Programme Design: Drafted core policies and program elements for national registries of citizens, healthcare facilities, and providers to enable seamless identification, authentication, and records management.

- State Adoption Roadmap: Developed strategies for state-level implementation, including phased integration with existing health IT systems and guidance for capacity building at state and district levels.

- Private Sector Incentives: Created frameworks to encourage private hospitals, diagnostic chains, and digital-health startups to host and share data securely—aligning incentives with long-term national goals of interoperability and patient-centric care.

Outcome :

The advocacy and policy design accelerated the operationalization of NDHM, laying the foundation for India's digital health infrastructure.

The national registries are now central to initiatives such as the Ayushman Bharat Digital Mission, improving patient identification, enabling seamless data exchange, and fostering a robust ecosystem for public–private innovation in healthcare delivery.

3 Driving Adoption of AI & Emerging Technologies in India's Digital Health Policies

Context :

As India's healthcare ecosystem moves toward a digitally integrated future, the Ministry of Health and Family Welfare (MoHFW) recognized the need to incorporate advanced technologies—particularly Artificial Intelligence (AI) and Machine Learning (ML) into national digital health policies. Leveraging these tools required new regulatory frameworks, technical expertise and cross-sector collaboration to ensure ethical use, scalability and public trust.

Our Approach :

We provided end-to-end advisory support to the MoHFW's e-Health Division by:

- Policy Design & Advisory: Guided the Ministry in formulating digital health policies that embed AI/ML for disease surveillance, clinical decision support, and population health analytics, while ensuring privacy and ethical safeguards.
- International Collaboration: Partnered with leading global donor agencies to secure technical and financial backing for AI-driven health initiatives.
- Technical Partnerships: Facilitated collaborations with premier academic institutions and nonprofit research bodies to co-develop AI products and pilot innovative use cases directly within the Ministry.
- Capacity Building: Led a multidisciplinary team to train ministry officials on AI/ML applications, ensuring long-term capability and sustainable policy adoption.

Outcome :

This strategic engagement accelerated the integration of AI and ML into India's digital health ecosystem.

The Ministry adopted forward-looking policies that enable AI-driven tools for diagnostics, predictive analytics, and health-system efficiency, positioning India as a leader in responsible digital health innovation.

4 GST Waiver on Health and Term Life Insurance

Context :

India's insurance penetration remains far below global averages, leaving households financially vulnerable to health shocks and loss of income.

A major deterrent for middle-class families and first-time buyers was the 18% Goods and Services Tax (GST) imposed on health and term life insurance premiums.

This tax burden elevated costs on essential risk-protection products, discouraging adoption and undermining national goals for universal financial inclusion.

Our Approach :

A coordinated policy-advocacy campaign was designed to frame health and term life insurance as social necessities rather than luxury services:

- Targeted Submissions: Detailed representations were submitted to the Ministry of Finance, the Department of Financial Services (DFS), and key members of the GST Council, providing comparative global data and actuarial analysis.

- Public-Interest Narrative: Policy briefs stressed that affordable insurance is critical to household financial resilience, particularly for India's growing middle class and lower-income segments.

- International Benchmarking: Cited practices from OECD nations where essential insurance products are taxed minimally or exempt, showing that India's 18 % levy stood as an outlier globally.

- Stakeholder Engagement: Continuous dialogue with insurers, consumer forums, and parliamentary representatives amplified the message that lower GST would expand coverage and reduce the state's fiscal burden in times of crisis.

Outcome :

The advocacy culminated in a landmark decision at the 56th GST Council Meeting on 3 September 2025, where the Council waived GST on health and term life insurance premiums.

This reform has reduced premium costs, encouraged wider adoption of protection plans, and is playing an important role in advancing India's broader objectives of financial security and social safety for millions of households.

5 Waiver of Import Duty on Life-Saving Cancer Drugs

Context :

Three cutting-edge oncology medicines Trastuzumab Deruxtecan, Osimertinib, and Durvalumab manufactured by a global pharmaceutical company were subject to a 10 % import duty despite being recognised globally as life-saving therapies. These drugs are critical for treating advanced breast, lung, and other hard-to-treat cancers.

The duty substantially increased treatment costs for Indian patients and hospitals, running counter to the government's stated goal of improving affordable access to essential medicines.

Our Approach :

A coordinated, multi-tiered advocacy effort was launched:

- Regulatory Engagement: Detailed representations were submitted to the GST Council, the Central Board of Indirect Taxes & Customs (CBIC), and the Department of Pharmaceuticals, underscoring the medical necessity and public-health rationale for a duty waiver.

- Policy Framing: Data on patient affordability, international best practices, and the limited domestic alternatives were presented to show that a zero-duty regime would directly reduce out-of-pocket cancer-care expenses.

- Parliamentary Outreach: The matter was highlighted to the Hon'ble Finance Minister through supportive parliamentarians, ensuring that the issue received attention at the highest policy level ahead of budget deliberations.

Outcome :

Following these sustained efforts, the Government of India removed the 10 % import duty on all three drugs, categorising them as life-saving therapies. The decision immediately lowered treatment costs for thousands of cancer patients and reinforced India's commitment to affordable access to advanced oncology care.

6 Securing GTE (Global Tender Enquiry) Relaxation for Critical Medical Devices

Context :

Under Rule 161(iv) of the General Financial Rules (GFR) 2017, a Global Tender Enquiry (GTE) relaxation can be granted when specialised medical devices are not manufactured in India.

Yet, several vital technologies, including an Expectable Corpectomy Device, neuro-shunts, and next-generation sequencing (NGS) machines essential for microbiology departments, were missing from the approved relaxation list.

With no domestic production and only a handful of global suppliers, public hospitals and research institutions faced lengthy procurement delays, threatening patient care and critical diagnostic work.

Our Approach :

A focused, evidence-driven advocacy effort was undertaken to close this policy gap:

- Targeted Representations: Submitted formal requests to the Department of Pharmaceuticals, the Ministry of Chemicals & Fertilizers, and the Ministry of Health & Family Welfare, seeking the inclusion of these devices in the GTE relaxation list.

- Demonstrating Necessity: Provided OEM authorisations, purchase records, and data on limited global availability, proving that these products are indispensable for microbiology diagnostics and cannot be sourced domestically.

- Public-Health Rationale: Emphasised that swift access to these technologies is essential for advanced research, infection control, and patient outcomes, and that procedural bottlenecks were undermining national health priorities.

Outcome :

The representation was formally taken up by policymakers for amendment of the GTE relaxation list, laying the groundwork for faster, exemption-based procurement of these critical devices.

This initiative ensures that India's medical and research institutions can obtain life-saving diagnostic equipment without avoidable delays, strengthening both public health infrastructure and the country's biomedical research capabilities.

7 Ensuring Fair Procurement Standards in India’s Rare Disease Policy

Context :

The National Policy for Rare Diseases (NPRD) 2021 included a suggestive list of equipment to guide procurement for designated Centres of Excellence (COEs).

However, the section covering Next-Generation Sequencing (NGS) systems cited a specific vendor model, unlike other equipment categories.

This inadvertently created a perception of bias, risking restricted competition and potentially limiting patient access to the best-suited technologies.

Our Approach :

A focused advocacy effort was launched to safeguard neutrality and fair market access:

- Direct Representation: Submitted a detailed memorandum to the Ministry of Health and Family Welfare (MoHFW), addressed to the Health Secretary, explaining how a brand-specific reference could skew procurement decisions.
- Policy Argument: Emphasised that platform-agnostic specifications would let COEs evaluate a wider range of NGS solutions based on clinical needs, cost-efficiency, and technical merit.
- Stakeholder Engagement: Highlighted that unbiased procurement aligns with the government’s commitment to transparent, competitive, and patient-focused healthcare delivery.

Outcome :

The MoHFW acknowledged the concern and revised the NPRD equipment list to remove brand-specific references.

This change restored a level playing field for all qualified NGS vendors, ensured fair participation in government tenders, and strengthened India’s diagnostic capacity for rare diseases, ultimately benefiting patients and advancing national healthcare objectives.

8 Securing Import Clearance for Clinical-Research Digital Tablets

Context :

A U.S.–based multinational life sciences company needed to import specialised digital tablets for use in an India-based clinical trial.

These devices were critical for real-time electronic data capture, a requirement to meet global research and regulatory standards.

Despite the clear research purpose and strict protocols, the initial application for import was rejected, creating uncertainty and threatening to delay the trial's launch and patient-recruitment timelines.

Our Approach :

A focused advocacy strategy was deployed to demonstrate the scientific necessity and regulatory safeguards of the project:

- Targeted Representations: Formal submissions were made to the Ministry of Electronics & Information Technology (MeitY) and the Department of Commerce, emphasising that the tablets were exclusively for clinical research and carried no commercial intent.

- Evidence of Benefits: Highlighted how electronic capture ensures greater accuracy, efficiency, and transparency compared to paper-based methods, aligning with India's digital-health and biomedical-research priorities.

- Regulatory Assurances: Committed to secure return or reconfiguration of all devices after the trial, in full compliance with Indian regulations and international best practices.

Outcome :

Following these engagements, the Joint Secretary of MeitY approved the import licence, clearing the way for timely commencement of the clinical trial.

The decision safeguarded the study's global timelines, reinforced India's commitment to cutting-edge digital research, and set a positive precedent for future technology-enabled clinical investigations.

9 Customs Clearance for Research-Use-Only (RUO) Imports

Context :

One of the Global Life Science and Clinical research company, imported specialized reagents and kits labeled Research Use Only (RUO) for academic and institutional research. Under CDSCO Notification 29/Misc/03/2020-DC(89) and the June 2020 clarification, RUO products are exempt from Central Drugs Standard Control Organisation (CDSCO) licensing or NOC.

Despite these explicit exemptions and end-user declarations, Bengaluru Air Cargo customs officials demanded a CDSCO NOC for multiple RUO consignments, holding shipments for over two months and disrupting time-sensitive research projects.

Our Approach :

We assisted the company in preparing and coordinating a multi-level advocacy effort:

- Submitted detailed justifications to Bengaluru Customs citing the CDSCO notifications and product catalogues confirming “Research Use Only”
- Engaged directly with the Deputy Drug Controller and CDSCO officials, who reaffirmed that RUO imports require no NOC.
- Escalated the matter to the Member (Customs), CBIC, requesting a meeting to resolve conflicting interpretations and ensure uniform application of national policy.

Outcome :

Following the meeting with the CBIC Member Secretary and review of CDSCO’s written clarifications, Customs issued directions allowing immediate clearance of the held consignments. This intervention restored timely import of RUO products, eliminated unnecessary licensing demands and established a precedent for consistent application of CDSCO exemptions across customs stations.

10 Restoring OEM Panel Access on Government e-Marketplace (GeM)

Context :

A U.S.–headquartered multinational supplying advanced laboratory and diagnostic equipment faced repeated vendor-assessment rejections on India's Government e-Marketplace (GeM) portal, even after its documents had been physically verified by officials.

As a result, the company's Original Equipment Manufacturer (OEM) panel was removed from its GeM dashboard.

This sudden exclusion prevented participation in several high-value, time-sensitive tenders—including projects from leading cancer hospitals, premier research institutions, and key public-sector laboratories—causing significant business loss and disruption of supply to critical healthcare facilities.

Our Approach :

A focused, multi-layered advocacy strategy was undertaken to secure immediate redress:

- Direct Engagement: Conducted multiple meetings with RITES (the authorised vendor-assessment agency) and senior GeM officials to present a detailed chronology of the repeated rejections.
- Formal Submissions: Provided comprehensive documentation including previous approvals, physical-verification records, and compliance certificates; highlighting the financial impact and the risk to critical healthcare projects.
- Business-Continuity Emphasis: Stressed the broader public-health implications of denying hospitals and research centres timely access to essential equipment.

Outcome :

Following sustained engagement and clear evidence of compliance, GeM restored the company's OEM panel access while the vendor-assessment process continued in parallel.

This resolution enabled immediate participation in ongoing tenders, prevented further revenue loss, and ensured that cancer hospitals and research institutions could procure the required equipment without delay, reinforcing fair competition and business continuity on India's national procurement platform.

11 Successful Mitigation of DRI Penalty on Misclassified HIV Diagnostic Kits

Context :

Between 2019 and 2021, HIV diagnostic kits supplied under a National AIDS Control Organisation (NACO) contract were misclassified by a logistics partner and cleared duty-free.

Although the classification error was corrected in 2021, the Department of Revenue Intelligence (DRI) subsequently issued a show-cause notice demanding USD X million in customs duties plus USD Y million in interest and penalties, exposing the client to significant and unexpected financial liability.

Our Approach :

A coordinated response was mounted by the client's Government Relations and legal teams, supported by external counsel:

- Regulatory Engagement: Conducted multiple rounds of discussions with NACO, its procurement agency SAMS, and Customs authorities to clarify the contractual and operational chain of responsibility.
- Legal Submissions & Hearings: Filed detailed representations establishing that the client was not the importer of record, and therefore could not be held liable for penalties attributable to the logistics partner's misclassification.
- Focused Argument: Emphasised that, at most, the client's responsibility should extend only to the differential customs duty, not to punitive interest or penalties.

Outcome :

After several hearings and careful review of the evidence, the DRI accepted these representations and reduced its demand to the differential customs duty alone, eliminating the additional interest and penalty claims.

This outcome substantially lowered the client's financial exposure, safeguarded its reputation with government stakeholders, and set a precedent for proportionate treatment in similar cases.

12 National Strategy for Primary Healthcare & Ophthalmology, Kingdom of Saudi Arabia

Context :

As part of Saudi Arabia's Vision 2030 reforms, the Ministry of Health sought to transform its primary healthcare (PHC) and ophthalmology services to deliver universal, high-quality care.

Achieving this required a unified national strategy, cross-sector coordination, and clear implementation pathways to strengthen insurance coverage, service delivery, and workforce capacity.

Our Approach :

We partnered with the Ministry of Health to co-create a comprehensive PHC and Ophthalmology strategy by:

- Stakeholder Alignment: Convened national stakeholders across insurance providers, public and private health-care delivery networks, and workforce planners to capture diverse operational perspectives.
- Strategic Design: Developed integrated business cases and policy frameworks that aligned PHC and ophthalmology priorities with KSA Vision 2030 health objectives.
- Implementation Roadmaps: Produced phased, actionable roadmaps detailing funding models, workforce requirements, infrastructure upgrades, and measurable outcomes to guide national rollout.
- Evidence-Based Analysis: Applied international best practices and data-driven projections to ensure financial sustainability and scalability.

Outcome :

The Ministry adopted the co-created national strategy, providing Saudi Arabia with a clear, evidence-based blueprint to elevate primary healthcare and ophthalmology services.

The plan supports Vision 2030 goals of improved access, stronger insurance integration, and a modernized health workforce, setting the foundation for measurable gains in population health and patient outcomes.

Section II :

FINANCIAL SERVICES, CAPITAL MARKETS & TAX POLICY

1 Reduction of TDS on E-Commerce Transactions under Section 194-O

Context :

The Finance Act, 2020 introduced Section 194-O of the Income-tax Act, 1961, requiring e-commerce operators (ECOs) to deduct 1% tax at source (TDS) on the gross value of every sale of goods or provision of services taking place through their platforms.

While intended to improve tax compliance, the provision created significant cash-flow pressure for small and medium sellers operating on marketplaces such as Flipkart, Amazon, Swiggy, and Zomato.

For thousands of these vendors, many with thin margins and limited access to credit—the 1% deduction on every transaction reduced already tight working capital and hampered their ability to reinvest in inventory and growth.

Our Approach :

A broad, multi-stakeholder advocacy effort was undertaken to highlight the unintended consequences:

- Industry Mobilisation: Organised roundtables and consultations with e-commerce operators and the All India Online Vendor Association to collect data on cash-flow impacts and gather unified industry feedback.

- Policy Engagement: Prepared detailed representations and financial models illustrating the negative effects on SMEs, which were submitted to the Ministry of Finance and the Department for Promotion of Industry and Internal Trade (DPIIT).

- High-Level Meetings: Held focused discussions with senior officials and tax-policy makers, stressing the need for a lower TDS rate to protect small businesses while maintaining revenue transparency.

Outcome :

In the Union Budget 2024, the FM announced a reduction of the TDS rate under Section 194-O from 1% to 0.1%.

This policy shift provided immediate relief to millions of online sellers and SMEs, improving their working-capital availability, enabling faster reinvestment, and supporting continued growth of India's thriving e-commerce ecosystem.

2 Advocacy for the 100% Foreign Direct Investment (FDI) in Insurance Aggregators

Context :

India remains one of the most under-insured major economies, with life and health insurance penetration well below global averages.

To expand coverage and reach new customers, the sector needs large-scale private and foreign investment in digital platforms and product innovation.

However, for insurance web aggregators—digital marketplaces that connect consumers with multiple insurers, the government had long capped foreign direct investment (FDI) at 49%, limiting their ability to raise capital and scale operations in a highly regulated industry.

Our Approach :

A coordinated, multi-agency advocacy strategy was implemented to highlight the importance of liberalising investment:

- Targeted Submissions: Formal representations were made to the Insurance Regulatory and Development Authority of India (IRDAI), Department for Promotion of Industry and Internal Trade (DPIIT), Ministry of Finance and NITI Aayog, underscoring the role of web aggregators in improving financial inclusion.

- Evidence-Based Dialogue: Multiple roundtables and stakeholder consultations brought together insurers, digital platforms, investors and policy experts to show how higher FDI limits would accelerate innovation and consumer access, particularly given India's absence of a universal social security scheme.

- Global Benchmarking: Policy briefs highlighted international best practices where full foreign ownership has spurred technological advancement and market growth.

Outcome :

The Government of India approved 100% FDI in insurance web aggregators, enabling these platforms to raise capital freely, scale nationwide and introduce cutting-edge technology.

This reform is fueling wider adoption of life and health insurance products through digital and online channels, helping close India's protection gap and strengthening household financial resilience.

3 Reclassification of Foreign Portfolio Investment (FPI) into FDI for a listed company

Context :

One of the listed company's largest shareholders is a Hong Kong-based Foreign Portfolio Investor (FPI).

To deepen its strategic stake, the investor wanted to acquire additional equity and transition its status from FPI to FDI.

While Indian law permits the transition from FPI to FDI, the process involves opening a dedicated FDI account and navigating a complex landscape of regulatory approvals. This includes compliance with the Foreign Exchange Management Act (FEMA), the Reserve Bank of India (RBI), the Department for Promotion of Industry and Internal Trade (DPIIT), and relevant sectoral caps.

However, due to the geopolitical sensitivity surrounding investments from Hong Kong and increased scrutiny under Press Note 3 (2020); which requires prior government approval for FDI from countries sharing land borders with India, the investor faced significant uncertainty and potential delays.

Our Approach :

We implemented a structured advocacy strategy to facilitate the transition:

- Regulatory Mapping: Analysed the applicable FEMA regulations, sectoral caps, and Press Note 3 requirements to identify the precise approvals and documentation needed.
- Stakeholder Engagement: Held multiple meetings with senior officials at the RBI and DPIIT, presenting the investor's compliance record and the strategic rationale for increasing its stake.
- Policy Clarification: Submitted formal representations seeking guidance on the procedural pathway for an FPI-to-FDI conversion involving a Hong Kong–based entity, ensuring alignment with the latest FDI policy and security considerations.

Outcome :

Through sustained engagement, the investor obtained approval to open an FDI account and successfully transitioned from FPI to FDI status, allowing it to increase its equity holding without breaching regulatory norms.

The company secured a stable, long-term capital base, while the investor gained full rights as a strategic shareholder, reinforcing confidence in India's transparent investment regime.

4 Advocacy on Press Note 3 and Investment Clarity for Alternative Capital Funds

Context :

Press Note 3 (2020) requires prior government approval for foreign direct investment (FDI) from countries sharing land borders with India, including cases where "beneficial ownership" is involved.

While designed to prevent opportunistic takeovers, the sweeping language created unintended consequences for India's Alternative Capital Funds (PE/VC/AIFs).

Because these funds rely on globally pooled capital, even passive or minority participation by Limited Partners (LPs) from neighbouring jurisdictions triggered PN3 approval, delaying transactions, raising compliance costs, and undermining investor confidence in India's start-up and growth-capital ecosystem.

Our Approach :

Working with the association representing private equity and venture capital stakeholders, we led a structured advocacy effort to align PN3 implementation with market realities:

- Focused Representations: Submitted detailed recommendations to the Department for Promotion of Industry and Internal Trade (DPIIT) urging that PN3 requirements be tested at the General Partner (GP) or fund-manager level, not at the passive LP level.
- Defining "Beneficial Ownership": Proposed a clear 10 % threshold, consistent with global norms and India's own anti-money-laundering and company-law standards.
- Facilitating Investment: Recommended a Green Channel for repeat approvals, minority or non-controlling deals, and listed funds without controlling investors from border-sharing countries.
- Predictable Timelines: Called for time-bound approval windows to reduce uncertainty and protect deal flow.

Outcome :

The DPIIT formally acknowledged the submissions and began an active dialogue with industry to refine PN3 implementation.

This advocacy effort placed the private-capital industry's concerns squarely on the policy agenda, helping preserve investor confidence, safeguard India's deal pipeline, and ensure that PN3 continues to prevent hostile takeovers without deterring high-quality long-term capital.

5 DPIIT Clarification on the FDI Rules for LLPs in the Wholesale Trading Sector

Context :

Members of the Indian Venture and Alternate Capital Association (IVCA) needed clarity on whether Limited Liability Partnerships (LLPs) operating in Cash & Carry Wholesale Trading (WT) could receive foreign investment under the automatic route.

While the sector permits 100% FDI, the Foreign Exchange Management (Non-Debt Instruments) Rules, 2019 require that LLP activities be in sectors with no "FDI-linked performance conditions."

Because the WT guidelines include certain operational norms such as customer licensing and transaction-record maintenance, investors and fund managers were uncertain whether these would be treated as "performance conditions," potentially restricting automatic FDI.

Our Approach :

We helped IVCA submit a detailed representation to the Department for Promotion of Industry and Internal Trade (DPIIT), addressed to the Joint Secretary and Deputy Secretary.

The submission:

- Analysed the NDI Rules and the Consolidated FDI Policy, differentiating general operational requirements from true performance conditions such as minimum capitalization or lock-in.
- Argued that WT sector rules are guidelines rather than binding performance conditions and therefore qualify for 100% automatic FDI.
- Requested formal confirmation of this interpretation to provide certainty for global investors and LLP structures.

Outcome :

DPIIT acknowledged the representation and initiated discussions to clarify policy treatment for LLPs in the WT sector. This engagement positioned the industry's interpretation on record, paving the way for smoother foreign investment flows into B2B wholesale operations while ensuring compliance with India's FDI framework.

6 Advocacy for the status quo on TCS under the Liberalised Remittance Scheme (LRS)

Context :

The Finance Act 2023 raised the Tax Collected at Source (TCS) on LRS foreign remittances from 5% to 20%, with the ₹7 lakh exemption threshold removed.

This sudden change disproportionately impacted retail investors and middle-class taxpayers, as significant funds were locked at the source. Fintech platforms, which enabled millions of Indians to invest small sums abroad, saw participation disrupted.

Our Approach :

Industry stakeholders, including leading fintech platforms and associations, made representations to the Ministry of Finance and GST Council. The submissions highlighted:

- The majority of investors were salaried, middle-income households remitting less than ₹15,000 on average.
- Remittances for investments were routed through regulated RBI channels in a closed-loop system, with proceeds returning to India.
- The sharp increase in TCS would create cash-flow blockages and deter participation, without adding net revenue to the exchequer.
- The policy contradicted the government's aim of deepening financial markets and supporting fintech innovation.
- A threshold-based system should be reinstated to distinguish everyday investors from high-net-worth discretionary remitters.

Outcome :

The government restored the exemption and later enhanced the threshold to ₹10 lakh. TCS now applies at moderate rates only beyond this limit, balancing revenue objectives with protecting retail investors and preserving fintech-driven global participation.

7 Press Note 3 (2020): Advocating Calibrated Easing of FDI Norms for Sunrise Sectors

Context :

As global capital flows softened, India witnessed a moderation in foreign direct investment, particularly into venture capital, private equity, and growth-stage investments.
The approval-based framework introduced under Press Note 3 (2020), while essential to safeguard against opportunistic takeovers, began to affect capital availability in non-sensitive, high-growth sectors.

Sunrise industries aligned with Atmanirbhar Bharat ,including advanced manufacturing, clean energy, digital infrastructure, semiconductors, and emerging technologies depend heavily on pooled global capital from private equity and venture capital funds, where even passive or minority participation by land-border investors can trigger approval requirements and delays.

Our Approach :

We supported the platform through targeted cultural-policy engagement and positioning:

- Cultural Narrative Building: Articulated the platform's role as a preserver and promoter of regional languages and dialects, aligned with India's intangible cultural heritage objectives.

- Government Engagement: Facilitated structured engagement with the Ministry of Culture at the central level and with State Culture and Language Departments across multiple states.

- Policy Alignment: Positioned local-language digital platforms as enablers of cultural preservation, regional identity, and inclusive participation in the digital creative economy.

- Multi-State Framework: Supported a scalable engagement approach across regions while safeguarding linguistic authenticity and cultural integrity.

Outcome :

The representation placed private capital concerns squarely within DPIIT's ongoing review of Press Note 3 implementation.

It strengthened the policy discourse around balancing national security with investment facilitation, reinforcing that predictable and risk-calibrated FDI norms are critical for sustaining capital flows into India's sunrise sectors and long-term economic growth.

NITI Aayog is actively giving its input on this issue.

Section III : DIGITAL ECONOMY, AI & EMERGING TECHNOLOGIES

1 Creating a Unified Voice for India's Web3 Industry

Context :

After the IAMAI-led Blockchain & Crypto Assets Council (BACC) was disbanded, India's rapidly growing Web3 ecosystem, spanning blockchain infrastructure, crypto exchanges, gaming platforms, and token projects etc were left without a collective industry body.

The absence of a unified platform limited the sector's ability to engage policymakers, build public trust and advocate for regulatory clarity at a time when India was emerging as a major hub for blockchain innovation.

Our Approach :

We worked closely with leading blockchain and crypto companies, including CoinDCX, CoinSwitch, Coinbase, Polygon, Hike and others, to establish a credible national association:

- Institution Building: Guided stakeholders through the legal registration of a Section 8 non-profit company, drafting its charter, bylaws, and governance framework, it was formally incorporated on 27 December 2022.

- Strategic Alignment: Helped define the association's mission around policy advocacy, innovation support, and investor protection, ensuring a balanced and future-ready mandate.

- Membership Development: Facilitated onboarding of a diverse member base, from infrastructure providers and trading platforms to gaming entities and token projects, to present a comprehensive industry perspective.

Outcome :

Today, the association is the recognised voice of India's Web3 industry, led by seasoned executives and technologists.

The association actively engages with central and state policymakers, has signed MoUs with governments such as Telangana to establish Web3 sandboxes and runs public-awareness campaigns like the "Crypto SAFE" initiative for investor education.

The association now serves as a key partner in shaping India's regulatory and innovation roadmap, ensuring that the country remains competitive in the global digital-asset economy.

2 Home-State Biometric Authentication for GST Registration

Context :

The small and medium-sized businesses (SMBs) expanding to new states, were required to travel to a designated GST Suvidha Kendra (GSK) in the registered jurisdiction. This created significant hurdles: interstate travel costs, appointment delays, and disruption to operations.

For a leading e-commerce company operating a large marketplace across India, these challenges slowed seller onboarding, delayed the launch of new fulfilment centres and increased compliance costs.

Our Approach :

To address these operational bottlenecks and enable faster, more efficient seller onboarding, we adopted a multi-pronged advocacy and engagement strategy focusing on policy alignment, data-backed representation and collaborative reform :

- Policy Engagement: The e-commerce company consistently engaged with the Central Board of Indirect Taxes and Customs (CBIC) and state GST commissioners to present data on the burden faced by sellers and to advocate for a more efficient, technology-enabled process.
- Evidence-Based Inputs: Shared seller feedback highlighting travel hardships, appointment backlogs, and lost business opportunities, especially for MSMEs.
- Collaborative Dialogue: Supported GSTN's goal of secure, fraud-resistant registration by endorsing stronger yet more convenient biometric verification, ensuring both compliance integrity and ease of doing business.

Outcome :

GSTN issued an official advisory permitting eligible promoters and directors to authenticate at any GSK within their home state, with slot booking and confirmation provided by email.

Now sellers get register in new states more quickly, without costly travel or scheduling delays. This has also reduced administrative and operational expenses for SMBs and for the e-commerce company's own expansion of fulfilment centres and warehouses while deterring fraudulent GST registrations and fake input tax credit (ITC) claims, enhancing trust across the digital marketplace ecosystem.

3 Policy Inputs to DPIIT on Consultation Paper on Generative AI 2025

Context :

As Generative Artificial Intelligence (GenAI) technologies rapidly gained traction across sectors, the Department for Promotion of Industry and Internal Trade (DPIIT) initiated a consultation to assess policy, regulatory, and ecosystem considerations for India's AI future.

The consultation sought stakeholder inputs on innovation enablement, responsible AI deployment, data governance, intellectual property, and India's global competitiveness—while ensuring alignment with public interest and national priorities.

We submitted our comprehensive feedback to the Guidelines issued on 8th December 2025.

Our Approach :

We undertook a structured review of the DPIIT consultation paper and submitted consolidated inputs, drawing from engagements with industry stakeholders, technology providers, and policy experts. Our submission focused on:

- Innovation-First Regulatory Approach: Emphasised the need for a light-touch, principles-based framework to support rapid innovation and experimentation in GenAI.
- Responsible AI & Risk-Based Guardrails: Recommended proportionate safeguards based on use-cases and risk profiles, rather than ex-ante restrictions on foundational models.
- Data & Compute Access: Highlighted the importance of enabling access to high-quality datasets, public digital infrastructure, and compute resources to support domestic AI development.
- IP & Training Data Considerations: Flagged emerging issues around copyright, data sourcing, and model training, advocating policy clarity aligned with global best practices.
- Atmanirbhar & Global Competitiveness Lens: Positioned GenAI as a strategic enabler for India's start-ups, MSMEs, and sunrise sectors, requiring policy certainty to attract investment and talent.

Outcome :

The submission contributed to DPIIT's multi-stakeholder consultation process on shaping India's GenAI policy approach.

The engagement reinforced the case for balancing responsible AI deployment with innovation enablement, and for positioning India as a competitive, trusted, and scalable hub for Generative AI development and adoption.

4 Promoting Regional Dialects through a Local-Language Digital Platform

Context :

India's linguistic diversity is a core cultural asset, yet many regional languages and dialects remain under-represented in mainstream digital media.

As digital content consumption expands beyond metropolitan centres, there is a growing policy focus on preserving local languages, oral traditions, and cultural narratives across states such as Haryana, Rajasthan, Uttar Pradesh, Gujarat, and Jammu & Kashmir.

A local-language digital content platform sought to position itself as a credible cultural ambassador, dedicated to authentic storytelling rooted in regional languages and dialects.

Our Approach :

We supported the platform through targeted cultural-policy engagement and positioning:

- Cultural Narrative Building: Articulated the platform's role as a preserver and promoter of regional languages and dialects, aligned with India's intangible cultural heritage objectives.
- Government Engagement: Facilitated structured engagement with the Ministry of Culture at the central level and with State Culture and Language Departments across multiple states.
- Policy Alignment: Positioned local-language digital platforms as enablers of cultural preservation, regional identity, and inclusive participation in the digital creative economy.
- Multi-State Framework: Supported a scalable engagement approach across regions while safeguarding linguistic authenticity and cultural integrity.

Outcome :

The platform gained recognition as a credible digital ambassador for regional languages and dialects.

Engagements with central and state culture ministries strengthened institutional acceptance of digital platforms as partners in cultural preservation, supporting regional expansion and reinforcing the role of local-language content in sustaining India's linguistic heritage.

Section IV : : INFRASTRUCTURE, ENERGY & STRATEGIC MANUFACTURING

1 Securing Infrastructure Status for Data Centres and Energy Storage Systems

Context :

As India’s digital economy and renewable energy capacity scaled rapidly, Data Centres and Energy Storage Systems (ESS) emerged as critical enablers of national priorities—ranging from data localisation and digital public infrastructure to grid stability and renewable energy integration.

However, the absence of formal infrastructure status limited access to long-term financing, increased cost of capital, and created policy uncertainty for these capital-intensive sectors with long asset lifecycles.

Our Approach :

Policy Access supported the policy case for inclusion by:

- Positioning Data Centres and ESS as core infrastructure assets, highlighting their capital intensity, strategic importance, and long-term public utility characteristics
- Aligning sector narratives with national policy objectives such as Digital India, energy transition, grid resilience, and investment-led growth
- Supporting structured engagement with policymakers to demonstrate how formal recognition would unlock financing, accelerate investments, and support broader economic outcomes

Outcome :

In October 2022, the Ministry of Finance notified amendments to the Harmonised Master List of Infrastructure Sub-Sectors, resulting in:

- Inclusion of Data Centres under the Communication category
- Inclusion of Energy Storage Systems (ESS) under the Energy category

This recognition enabled:

- Access to infrastructure-linked, long-term financing
- Improved investor confidence and project viability
- Accelerated development of digital and energy transition infrastructure

2 Safeguarding Supply Chains for Electronics Components Manufacturing Scheme, ECMS PLI

Context :

The Government of India launched the Electronics Components Manufacturing Scheme (ECMS) to deepen the domestic base of semiconductors, printed circuit boards, and other critical parts.

Yet India's heavy reliance on Chinese sub-components and rare-earth minerals, combined with Press Note 3 (2020), which requires prior government approval for FDI from neighbouring countries, created uncertainty for the cross-border partnerships and technology transfers essential to scaling ECMS projects.

Without timely access to proven suppliers and mineral inputs, many proposed facilities risked delays or under-utilisation.

Our Approach :

We, alongwith the Industry stakeholders pursued a focused advocacy strategy to align supply-chain realities with national security goals:

- Multi-Ministry Engagement: Conducted high-level consultations with the Ministry of Electronics & Information Technology (MeitY), Department for Promotion of Industry and Internal Trade (DPIIT), and the Ministry of Mines.

- Targeted Recommendations:

  a) Urged streamlined approval pathways under Press Note 3 for critical technology investments and joint ventures supporting ECMS targets.

  b) Proposed structured frameworks for JV formation and technology transfer that safeguard supply-chain security while enabling near-term production.

  c) Advocated parallel incentives for domestic rare-earth exploration and diversified global sourcing to reduce medium-term dependence on Chinese inputs.

Outcome :

The government acknowledged these concerns and introduced complementary measures to the ECMS: easing vetted foreign collaborations, clarifying approval timelines under Press Note 3 and announcing incentives for domestic rare-earth processing and alternative sourcing.

These steps reassured investors, allowed essential joint ventures to move forward and has helped keep India's Electronics Components Manufacturing Scheme on track to meet its ambitious production and export objectives.

3 Empanelment of a Bengaluru-based Drone Company with a highway PSU

Context :

A Bengaluru-based drone technology company sought to participate in large-scale road and highway infrastructure projects by bidding for upcoming Requests for Proposal (RFPs) issued by a leading Highway Public Sector Undertaking (PSU).

However, the company faced procedural hurdles in getting formally empanelled, a prerequisite for bidding, due to ambiguity in technical eligibility criteria and limited precedent for using drones in highway surveys and monitoring.

Without empanelment, the company risked missing significant business opportunities in aerial mapping, project monitoring, and maintenance operations.

Our Approach :

Our team initiated a focused advocacy strategy to align the PSU's requirements with the evolving capabilities of drone technology.

- Conducted stakeholder meetings with the Chairman of the National Highways Authority of India (NHAI) and the Member (Technical) to present the company's credentials and compliance with national drone regulations.
- Highlighted how drone-based solutions can improve safety, reduce project timelines, and enhance cost-efficiency in highway construction and monitoring.
- Addressed specific technical concerns and facilitated follow-up discussions to expedite the empanelment process.

Outcome :

Following these engagements, the highway PSU approved the application and the company was successfully empanelled, enabling it to participate in RFPs for highway projects nationwide.

4 Positioning PGNAA Technology with the Ministry of Mines

Context :

An American life sciences and analytics company sought to introduce its Prompt Gamma Neutron Activation Analysis (PGNAA) technology, an advanced, real-time bulk material analysis system, to India's iron ore and steel sector.

Although PGNAA had more than 120 installations in India's cement industry and over 1,400 worldwide, its adoption in iron ore remained limited. Meanwhile, the Ministry of Mines had issued guidelines urging industry to adopt real-time ore classification technologies, creating a timely opportunity to advocate for PGNAA as the preferred solution.

Our Approach :

We worked closely with the government affairs team and internal process analytics experts to:

- Compile a strong technical and economic value proposition, demonstrating rapid ROI (6–9 months) and proven global success.
- Map key decision-makers in the Ministry of Mines and allied agencies, highlighting ministry directives that specifically referenced "cross-belt" ore analysis.
- Conduct targeted meetings and presentations with senior officials to position PGNAA as the only penetrative, continuous-analysis technology aligned with ministry objectives.
- Showcase PGNAA's successful cement-sector track record to build confidence for steel and iron-ore applications.

Outcome :

The Ministry of Mines acknowledged PGNAA as a relevant and proven solution for real-time ore classification and encouraged leading steel producers like Tata Steel, JSW, SAIL, and others to evaluate it for deployment.

This endorsement has accelerated industry interest, opened pilot discussions with major steelmakers, and positioned the company as the technology partner of choice for advanced ore-analysis solutions in India's mining and metals sector.

5 Securing Interest Rate Reduction on the sanctioned loan from REC Limited

Context :

A leading power sector company secured a large sanctioned loan from REC Limited to finance a critical transmission and distribution (T&D) project.

While the loan was approved on standard terms, the prevailing interest rate created a substantial long-term cost burden, threatening project viability over the multi-year tenor.

REC's lending framework, however, provides for rate reductions when projects demonstrate renewable energy alignment, strong borrower ratings, large loan volumes, or aggressive disbursement schedules; if these factors are properly negotiated and documented.

Our Approach :

We conducted a detailed review of REC's policies and the borrower's financial profile, identifying multiple levers for rate optimisation.

- Mapped the project to REC's renewable and green-energy incentives.
- Presented the borrower's robust credit rating and large loan volume to qualify for volume-based rebates.
- Structured a disbursement schedule to meet REC's "timely drawdown" requirements.
- Coordinated supporting documentation and direct engagement with REC officials to align the proposal with policy parameters.

Outcome :

REC approved a significant interest-rate reduction and embedded a reset clause for future downward revisions.

This lowered the borrower's financing costs over the loan tenor and improved project viability while remaining fully compliant with REC's policy framework.

6 Expanding MSME Definition and Enhancing Credit Access

Context :

Micro, Small and Medium Enterprises (MSMEs) are a critical engine of India's economy, contributing significantly to manufacturing, exports, and employment. However, legacy investment and turnover thresholds constrained scale, access to capital, and formalisation, limiting growth and competitiveness.

Our Approach :

We engaged with stakeholders across the MSME ecosystem including industry associations, lenders, and sectoral experts and submitted structured policy inputs to DPIIT and the Ministry of MSME emphasizing:

- Rationalised Classification Framework to enable more enterprises to qualify as MSMEs, reducing constraints on scaling.
- Capital Access Enhancement to improve eligibility for institutional credit and government-backed support.
- Growth-Friendly Thresholds aligned with inflation, technology costs, and global competitive benchmarks.
- Atmanirbhar Bharat Alignment to ensure MSME reforms support broader goals of manufacturing expansion and inclusive employment.

Outcome :

The Union Budget 2025-26 announced the following reforms for MSME classification, effective April 1, 2025:

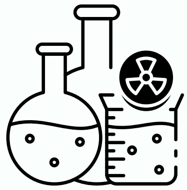
- Micro Enterprises: Investment limit raised from ₹1 crore to ₹2.5 crore; turnover limit from ₹5 crore to ₹10 crore.
- Small Enterprises: Investment limit increased from ₹10 crore to ₹25 crore; turnover from ₹50 crore to ₹100 crore.
- Medium Enterprises: Investment ceiling expanded from ₹50 crore to ₹125 crore; turnover threshold from ₹250 crore to ₹500 crore.

Additionally, enhanced credit access measures were introduced:

Credit Guarantee Coverage: Increased for micro and small enterprises from ₹5 crore to ₹10 crore, unlocking additional credit over the next five years

Section V : TRADE, CLIMATE & REGULATORY RESOLUTION

1 Rolling Back a 150% Basic Customs Duty on Laboratory Chemicals



Context :

On 23 July 2024, the Government of India sharply increased the Basic Customs Duty (BCD) on laboratory chemicals classified under HSN 9802 from 10 % to 150 %.

This unexpected change created a cumulative financial impact of nearly USD 37 million across research institutions, universities, and industrial laboratories, threatening to raise R&D costs, delay experiments, and limit access to critical scientific reagents.

Our Approach :

A three-pronged advocacy strategy was executed to highlight the severe implications for India's innovation ecosystem:

- Direct Government Engagement: We submitted detailed representations to the Ministry of Finance, Department of Revenue, and allied agencies, demonstrating how the steep duty would cripple research budgets and deter investment.

- Industry Association Leverage: We partnered with leading industry bodies and trade associations, enabling them to file their own formal representations and amplify the collective voice of scientific stakeholders.

- Customer Advocacy: We helped mobilised key academic institutions and industrial research customers to communicate directly with policymakers, sharing real-world examples of cost escalations and potential project cancellations.

Outcome :

1st Amendment issued: The GoI rolled back the 150 % duty increase, restoring the earlier 10 % rate for bona fide research imports, while restricting these imports from being traded or resold.

2nd Amendment issued: To further streamline compliance, the government removed SKUs meant for trading or resale from HSN 9802 and reclassified them under their original tariff headings, eliminating ambiguity and ensuring legitimate research supplies remain affordable.

2 Restoring SEZ Online to Safeguard Import Operations

Context :

In early 2025, the Government of India mandated that all Special Economic Zone (SEZ) units use the ICEGATE portal for filing Shipping Bills (SB) and Bills of Entry (BoE), discontinuing the long-standing SEZ Online platform.

Soon after the mandate took effect, SEZ units nationwide reported serious technical problems with ICEGATE; particularly when uploading Bills of Materials (BOM).

The glitches caused repeated filing failures, delaying import clearances and disrupting critical supply chains, including high-value manufacturing and export operations.

Our Approach :

To prevent a prolonged slowdown of SEZ trade, a multi-tiered advocacy campaign was launched:

- Direct Government Engagement: Multiple representations were submitted to the Member (Customs), CBIC, the Joint Secretary (Customs), and the Joint Secretary, Department of Commerce, detailing specific system failures.
- Evidence-Based Demonstrations: Importers and SEZ stakeholders provided live demonstrations of the BOM-filing difficulties, giving officials a clear view of the operational bottlenecks.
- Collaborative Consultation: Worked with SEZ Development Commissioners to present a unified industry position and request immediate relief until ICEGATE could be stabilised.

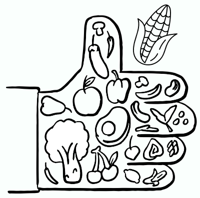
Outcome :

The Department of Commerce issued a notification in March 2025 allowing continued use of SEZ Online for critical transactions, including merchant-exporter shipments, DTA supplies, and zone-to-zone transfers till further orders.

Development Commissioners were also empowered to approve SEZ Online filings on a case-by-case basis wherever unique challenges persisted.

This timely intervention averted large-scale import and export delays, protected supply chains, and gave the government breathing room to resolve ICEGATE’s technical issues without halting SEZ operations.

3 Import License to diversify Popping Corn supply for an Agro Food Company



Context :

An Indian agro-food company relied on a single domestic supplier for popping corn used in its Instant, Microwave and Ready-to-Eat popcorn lines. The supplier charged a premium, while global prices for popping maize had fallen sharply. To reduce costs and secure competitive sourcing, the company sought an import license to procure 5,000 MT of maize corn from Argentina or Brazil, countries with abundant, lower-priced supply.

Our Approach :

We assisted the company in preparing and submitting the import-license application to the Directorate General of Foreign Trade (DGFT). Key steps included:

- Compiling proforma invoices covering 5,000 MT from Argentina and Brazil to demonstrate flexibility in sourcing based on price and availability.
- Documenting the company's manufacturing footprint across six facilities in Uttarakhand, Telangana, Assam, Gujarat, Uttar Pradesh, and Andhra Pradesh to establish genuine industrial use.
- Highlighting the cost and market dynamics that justified imports despite domestic availability, ensuring alignment with government trade policy.
- Coordinating with officials to expedite scrutiny and address queries promptly.

Outcome :

The DGFT granted the import license, enabling the agro-food company to source maize corn at competitive international prices. This reduced raw-material costs, strengthened supply security, and improved margins across its nationwide popcorn manufacturing operations.

4 Navigating a mid-Contract GST revision on a GeM Order for Hydrocarbon Equipment

Context :

An American life sciences company received a high-value order through Government e-Marketplace (GeM) to supply specialized equipment to a customer engaged in the exploration and production of hydrocarbons.

At the time the order was issued, the transaction qualified for a preferential Goods and Services Tax (GST) rate of 12 %, because equipment for petroleum and coal-bed methane operations enjoyed concessional treatment. The GeM purchase order reflected a single consolidated price inclusive of GST, so invoicing was locked to the original tax assumptions.

On 17 September 2025, the Central Board of Indirect Taxes & Customs (CBIC) released Notification No. 36/2025-Customs, implementing the 56th GST Council recommendation to increase IGST on specified petroleum-sector goods from 12 % to 18 % with effect from 22 September 2025. This sudden revision rendered the earlier preferential rate inapplicable. Yet the customer, who had not formally received the notification, was unwilling to accept the higher rate, leaving the company unable to issue invoices or recognize revenue while remaining compliant with new law.

Our Approach :

The life sciences company undertook a multi-pronged engagement to resolve the conflict quickly and transparently.

- Customer engagement: Shared the official CBIC notification and GST Council minutes to explain the statutory change and the legal necessity of revising the tax rate.
- GeM coordination: Worked closely with the GeM support team to identify the correct process for purchase-order amendment within the platform's consolidated-value contract structure.
- Internal alignment: Coordinated with finance, legal, and supply-chain teams to ensure that documentation, invoicing, and revenue recognition for Q3 would remain accurate once the amendment was approved.
- Stakeholder follow-up: Maintained continuous dialogue with the customer's finance department and procurement team to obtain timely confirmation and prevent delivery delays.

Outcome :

The customer acknowledged the revised statutory requirement and approved an amendment to the GeM purchase order reflecting the 18 % GST rate.

The American life sciences company updated invoices accordingly, remained fully compliant with CBIC regulations, and secured on-time Q3 revenue realization without contractual disputes or penalties.

5 Policy Inputs on Implementation of the Four Labour Codes (2025)

Context :

The notification and phased implementation of the four Labour Codes on Wages, Social Security, Industrial Relations, and Occupational Safety, Health and Working Conditions; represent a significant overhaul of India's labour regulatory framework.

As Central and State Governments moved towards operationalising the Codes in 2025, industry stakeholders highlighted the need for regulatory clarity, harmonised rule-making, and balanced implementation to ensure worker protection, formalisation of employment, and ease of doing business.

Our Approach :

We undertook a detailed review and submitted structured inputs to the concerned Ministries,

- Code on Wages, 2019 (Chapters II & III – Minimum Wages; Payment of Wages): Suggested clarity on wage definitions, calculation methodology, and compliance timelines to ensure uniform interpretation and reduce litigation risk.
- Code on Social Security, 2020 (Chapters III, IV & IX – Social Security for Employees; Gig and Platform Workers; Finance and Accounts): Provided inputs on operationalising social security for gig and platform workers, contribution mechanisms, and alignment with digital compliance systems.
- Industrial Relations Code, 2020 (Chapters II, III & X – Trade Unions; Standing Orders; Dispute Resolution): Recommended balanced thresholds and streamlined processes to support industrial harmony while enabling operational flexibility.
- Occupational Safety, Health and Working Conditions Code, 2020 (Chapters IV, V & VI – Safety Standards; Working Hours; Contract Labour): Flagged implementation challenges relating to inspections, registrations, and uniform applicability across States, advocating risk-based and technology-enabled enforcement.

Outcome :

The submission contributed to the ongoing stakeholder consultation process on Labour Code implementation.

The engagement reinforced the need for harmonised, phased, and implementation-ready rules that protect worker interests while supporting investment, employment generation, and formalisation of India's workforce.

6 Policy Inputs on Quality Control Order (QCO) Reforms

Context :

India's Quality Control Order (QCO) framework under the Bureau of Indian Standards (BIS) expanded rapidly from fewer than 70 products in 2016 to nearly 790 by 2025, encompassing many raw materials and intermediate inputs.

While initially aimed at safeguarding quality and consumer interests, the expanded regime increased compliance burdens, disrupted supply chains, and raised costs for manufacturers—particularly MSMEs and sectors reliant on imported inputs. This dynamic prompted a high-level review and a shift towards rationalisation of QCOs, risk-based regulation, and alignment with national competitiveness and industrial policy priorities.

Our Approach :

We submitted targeted inputs to the relevant ministries and inter-ministerial consultation processes on the ongoing QCO reforms, with emphasis on:

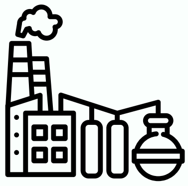
- Regulatory Rationalisation: Advocated for the withdrawal or suspension of QCOs on low-risk inputs and intermediate goods where downstream standards already ensure quality, reducing unnecessary compliance costs.
- Risk-Based Framework: Supported the shift towards risk-calibrated regulation that focuses mandatory controls on products with genuine public-safety implications.
- Supply Chain Continuity: Highlighted how removal or deferment of QCOs on key raw materials increases supply-chain efficiency and competitiveness for domestic manufacturing.
- Alignment with Trade & Ease of Doing Business Goals: Suggested synchronization of QCO reforms with international best practices and WTO obligations to avoid non-tariff barriers while maintaining quality assurance.

Outcome :

The submission contributed to the policy discourse on QCO rationalisation, reinforcing the case for a smart, calibrated quality control regime that balances public-safety objectives with the economic imperatives of industry and export competitiveness.

Subsequent government action—including withdrawal of numerous QCOs for chemicals, polymers, and intermediate products and postponement or exemption of enforcement dates—signals a shift towards a more streamlined, risk-based quality ecosystem, particularly benefiting MSMEs and manufacturing sectors dependent on global inputs.

7 End-to-End Regulatory Clearances for a Leading chemical company with multinational operations



Context :

A prominent Indian chemical manufacturer faced multiple regulatory and financial hurdles affecting its operations and planned capacity expansion.

- Environmental clearance was pending for a major plant expansion.
- State incentives tied to one of its existing plants had not been released.
- Renewals for air and water consents required to maintain operations were approaching their deadline.

Delays on any of these fronts threatened production timelines and future investment plans.

Our Approach :

A targeted engagement strategy was implemented across central and state levels:

- Coordinated with the Environmental Impact Assessment (EIA) division of the Ministry of Environment, Forest and Climate Change (MoEFCC) to secure early inclusion and approval of the proposal in the Central EIA Committee agenda.
- Met with key officials at the District Industries Centre (DIC) to resolve bottlenecks and expedite the release of pending incentives.
- Engaged the Chairman and Member Secretary of the State Expert Appraisal Committee (SEAC) to fast-track both the environmental clearance and the renewal of air and water consents.

Outcome :

The coordinated engagement produced swift, measurable results.

- The Ministry of Environment, Forest and Climate Change (MoEFCC) granted full environmental clearance for the capacity-expansion project.
- The state government released the pending incentive package, unlocking critical funds for ongoing operations.
- The State Expert Appraisal Committee (SEAC) approved both the environmental clearance and the 'air and water consent' renewals well within the required timelines.

Together, these actions removed regulatory bottlenecks, safeguarded continuous production and enabled the chemical manufacturer to proceed confidently with its planned growth strategy.

8 Advocating PLI Extension to APIs and Med-Tech Manufacturing

Context :

The Production Linked Incentive (PLI) Scheme has played a key role in strengthening domestic manufacturing of pharmaceuticals and medical devices. However, critical gaps remain in upstream manufacturing—particularly for Active Pharmaceutical Ingredients (APIs), complex generics, biosimilars, vaccines, and high-end medical technology.

Global supply-chain disruptions and continued import dependence for APIs and advanced medical equipment highlighted the need to expand PLI coverage beyond finished formulations and devices to ensure long-term supply security, cost stability, and manufacturing depth.

Our Approach :

We engaged with pharmaceutical and medical technology stakeholders and submitted focused inputs advocating a calibrated expansion of the PLI framework:

- PLI Coverage Expansion: Recommended extending PLI incentives to APIs, complex generics, biosimilars, vaccines, and advanced medical technologies.
- Domestic Value Addition: Emphasised incentivising upstream manufacturing and higher domestic value addition rather than import-dependent assembly.
- Investment & Scale Enablement: Highlighted how predictable PLI support would unlock long-term capital investment and capacity creation.
- Healthcare Security Lens: Positioned PLI expansion as essential to reducing import dependence and strengthening national health preparedness.

Outcome :

The engagement strengthened the policy case for broadening the PLI scheme to cover critical upstream pharmaceutical inputs and advanced med-tech manufacturing.

It reinforced the role of PLI as a strategic tool not only for boosting production, but also for building resilient supply chains, improving affordability, and advancing India’s pharmaceutical and medical-technology self-reliance objectives.

9 Policy Inputs to MoRTH on Motor Vehicle Aggregator Guidelines, 2025

Context :

With the rapid evolution of app-based mobility, EV adoption, and multi-modal transport services, MoRTH undertook a revision of the Motor Vehicle Aggregator Guidelines under Section 93 of the Motor Vehicles Act, 1988.

The revised framework aimed to strengthen passenger safety, driver welfare, and regulatory oversight, while enabling innovation and ease of compliance across States.

We sumitted our comprehensive feedback to the Guidelines issued on 1st July 2025.

Our Approach :

We conducted a focused clause-level review of the draft Motor Vehicle Aggregator Guidelines, 2025 and submitted targeted inputs to MoRTH covering:

- Applicability & Licensing (Clauses 2, 4, 7–9): Sought clarity on scope, licence validity, and harmonisation to avoid inconsistent state-level implementation.
- Driver Welfare & Onboarding (Clauses 10–11): Recommended phased compliance and alignment with existing social security frameworks.
- Vehicle Safety & Compliance (Clauses 12, 13, 15): Provided inputs to ensure uniform, enforceable safety and fitness standards.
- Technology, Data & Platforms (Clause 14): Advocated technology-neutral obligations aligned with data protection and cybersecurity requirements.
- Grievance Redressal & Consumer Protection (Clause 9.10; 14.13–14.14): Supported robust grievance mechanisms with clearer operational processes.
- Fare Regulation (Clause 17):Suggested predictability in fare frameworks while retaining operational flexibility.

Outcome :

The submission contributed to MoRTH’s stakeholder consultation process and supported the development of a balanced, implementation-readyregulatory framework for India’s shared mobility ecosystem.

10 Supporting MoEFCC’s Engagement at UNFCCC COPs

Context :

As the nodal ministry for climate action, the Ministry of Environment, Forest and Climate Change (MoEFCC) leads India’s participation in UNFCCC negotiations, including the Conference of the Parties (COP).

With negotiations increasingly focused on climate finance, energy transition, adaptation, and transparency frameworks, MoEFCC required coordinated technical inputs and stakeholder alignment to advance India’s positions while safeguarding national development priorities.

Our Approach :

We provided structured policy and coordination support to MoEFCC for its COP engagement:

- Supported preparation of technical briefs and issue notes aligned with India’s NDCs, Long-Term Low Emissions Development Strategy (LT-LEDS), and domestic climate initiatives
- Assisted in inter-ministerial and stakeholder consultations to ensure consistency across negotiation tracks, including mitigation, adaptation, and climate finance
- Facilitated engagement with multilateral institutions and international partners to position India’s priorities on equity, finance, and technology access

Outcome :

The engagement strengthened MoEFCC’s preparedness and coherence across COP negotiation tracks.

India’s positions were articulated with greater clarity in formal negotiations and bilateral engagements, reinforcing its leadership on development-aligned climate action and equitable implementation of global climate commitments.

11 Advocating for of Energy-From-Waste in Renewable Energy Norms (MNRE/CEA Draft)

Context :

India's renewable energy targets are anchored in expanding clean power capacity and reducing carbon intensity. While wind, solar, and hydro projects are well supported under existing regulatory frameworks, energy derived from waste—including biomass, municipal solid waste (MSW), refuse-derived fuel (RDF), and bio-CNG/feedstock-based generation—has faced classification ambiguity.

Draft provisions under the Central Electricity Authority (CEA) and Ministry of New and Renewable Energy (MNRE) had proposed usage norms that limited eligibility for renewable purchase obligations (RPOs), renewable energy certificates (RECs), and other incentives primarily to wind, solar, and hydro. This raised concerns that waste-to-energy sources might be excluded from mainstream renewable regulatory treatment, despite their climate and circular-economy contributions.

Our Approach :

We reviewed the MNRE / CEA draft provisions on renewable energy classification and submitted policy inputs to MNRE, CEA, and relevant inter-ministerial committees. Our engagement focused on:

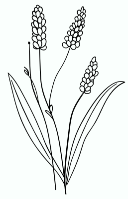
- Draft Norms Review: Assessed renewable energy definitions to identify ambiguity or exclusion of energy-from-waste sources from RPO and REC eligibility.
- Inclusion of Waste-Derived Energy: Recommended explicit recognition of biomass, MSW/RDF-based power, and bio-CNG within the renewable energy framework.
- RPO/REC Alignment: Suggested enabling energy-from-waste projects to qualify for RPO compliance and REC issuance under applicable CEA regulations.
- Flexible Usage Norms: Advocated operationally realistic norms reflecting the capacity and seasonal characteristics of waste-to-energy generation.
- Investment Enablement: Highlighted that regulatory clarity would improve project bankability and attract long-term investment, supporting circular-economy goals.

Outcome :

Our submission strengthened the policy discussion around the treatment of waste-derived energy in the MNRE / CEA draft framework for renewable energy norms.

It reinforced the rationale for expressly including energy from waste within the renewable energy definition, enabling such sources to qualify for RPO compliance and REC mechanisms. The input helped shape ongoing consultations and highlighted the economic and environmental value of waste-to-energy projects in advancing India's clean energy, waste management, and circular-economy goals.

12 Public Release of Millet Revitalization CSR Report of a Global MNC



Context :

As part of its Corporate Social Responsibility (CSR) agenda, a Global MNC undertook a Millet Revitalization Project in the Kanthalloor block, Idukki, Kerala aiming to restore traditional millet cultivation, strengthen farmer livelihoods, and promote climate-resilient agriculture.

After successful implementation, the MNC sought to publicly release the impact report in a way that would highlight its positive contribution to sustainable agriculture and rural development. To maximise visibility and credibility, the company aimed for the report to be unveiled by a highly respected public figure who commands attention at policy and industry "high tables."

Our Approach :

We alongwith the government affairs team of the MNC coordinated with CSR partners and external stakeholders to:

- Identify an eminent national personality with influence in agriculture, sustainability, and public policy to launch the report.
- Align the release with broader government initiatives on the International Year of Millets and India's G20 commitments.
- Develop a communications plan and supporting materials to position MNC as a committed partner in rural revitalization and agri-innovation.

Outcome :

An influential public leader agreed to release the report at a high-visibility event, amplifying the MNC's reputation as a responsible global technology company.

The launch drew policymakers, industry leaders, and media, reinforcing the company's position as an active partner in advancing India's sustainable agriculture goals.

About Policy Access :

Policy Access partners with businesses to navigate India's complex policy and regulatory landscape through a blend of deep government insight, technical expertise, and on-ground execution.

Our strength lies in the diverse experience of our team including former government officials, public policy specialists, sector experts, and industry leaders who bring decades of hands-on experience in policymaking, regulatory engagement, narrative building and market access.

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