

CHAPTER V: MINISTRY OF POWER

5.1 *Implementation of Standards and Labelling Scheme by Bureau of Energy Efficiency*

5.1.1 Introduction

5.1.1.1 Need to bring in energy efficiency

Energy is the prime mover of economic growth and is vital to the maintenance of a modern economy. Sustainable development requires the long-term availability of energy from sources that are affordable, accessible and environment friendly. Efficient use of energy conserves the natural resources for future, besides providing financial and environmental benefits. Energy Conservation Act (EC Act) came into force in 2001, for providing statutory powers to Government of India (GoI) on energy efficiency and conservation, with a thrust on self-regulation and market principles. GoI established (March 2002) Bureau of Energy Efficiency (BEE) to assist them in developing policies and strategies in this regard. BEE developed six flagship programmes for energy conservation and Standards & Labeling is one of them.

5.1.1.2 Salient features of Standards & Labeling Scheme

The Standards & Labeling (S&L) Scheme was launched by the Ministry of Power (MoP) in May 2006 and, accordingly, BEE implemented this Scheme to provide Star rating (from one to five, in increasing order of energy efficiency) to various models of ‘appliances and equipment (products)’ brought under the S&L Scheme. BEE’s Star rating label is a trusted government-backed symbol for energy efficiency of the models, which encourages consumers to save money and environment by using Star rated models.

BEE launches the labeling Scheme for a new product, initially on voluntary¹ basis based on studies conducted by NGOs/BEE, with concurrence of MoP. After two to three years, BEE conducts market studies to evaluate market transformation, technology improvement and related institutional needs for moving the product from voluntary to mandatory² phase. As of August 2018, BEE had 21 (10 mandatory³ and 11 voluntary⁴) products under S&L Scheme. Similar energy efficiency scheme is prevailing for more

¹ *Selection of voluntary products depend on present market size and potential of energy saving. For voluntary products, the manufacturers have the option to obtain the Star Rating of BEE for their models.*

² *For the mandatory products, the manufacturers are under obligation to obtain approval of the Star rating of their models from BEE, before these are put for sale in the market.*

³ *(i) Room Air Conditioners(ACs), (ii) Frost Free Refrigerators(FFR), (iii) Tubular Florescent Lamp(TFL), (iv) Distribution Transformer, (v) Room Air Conditioner (cassettes, Floor standing), (vi) Direct Cool Refrigerator(DCR), (vii) Color TV, (viii) Electric Geysers, (ix) Variable capacity inverter Air Conditioners, and (x) LED Lamps.*

⁴ *(i) Induction Motors, (ii) Pump Sets, (iii) Ceiling Fans, (iv) LPG-Stoves, (v) Washing Machine, (vi) Computer (Notebooks/laptops), (vii) Ballast (electronic/magnetic), (viii) Office Equipment (Printer, copier, scanner, MFDs), (ix) Diesel Engine Driven Monoset pumps, (x) Solid State Inverter, and (xi) DG Sets.*

than 27 years in USA for 62 products and for more than six years in Australia for 25 products.

5.1.1.3 Mandate to BEE

Under Section 13 of EC Act, BEE has to:

- ✓ recommend to the Government energy consumption norms and contents & manner of display of Star Labels,
- ✓ develop testing/certification procedure and promote testing facilities for certification,
- ✓ check testing⁵ for energy consumption of the products/models, and
- ✓ levy fee on registered models, for services provided under S&L Scheme.

5.1.1.4 Targets and Funding

The Government of India released grant of ₹4.40 crore (November 2012 to March 2013) for the S&L scheme for XII Plan period (2012-13 to 2016-17). In February 2014, the Expenditure Finance Committee⁶ decided that the entire S&L Scheme shall be funded by fees to be levied by BEE on production of registered models. GoI approved (July 2014) an outlay of ₹120.00 crore for implementing the S&L Scheme during XII Plan period. Target for energy savings during this period was 13.95 billion units (BUs).

5.1.2 Audit Objectives and Scope

This audit was conducted with the objectives to check whether:

- ✓ targets of energy savings were clear, quantifiable and achieved;
- ✓ rules, regulations and procedures were adequate and complied with; and
- ✓ implementation and monitoring mechanism was adequate to sustain the scheme.

Audit examined the activities of S&L scheme primarily undertaken by BEE for XII Plan.

5.1.3 Audit Criteria

Audit criteria were derived from (i) The EC Act, 2001, (ii) Rules and Regulations notified by the Central Government, (iii) Product Schedules, (iv) XII Plan for S&L Scheme, (v) Scheme documents and Operations Manual (OM) of BEE, (vi) Benchmarks/Standards set for assessing the achievements and (vii) Reports/studies conducted under S&L Scheme.

⁵ *Check testing is conducted by BEE of models (for which it has approved the star ratings) by taking samples of models from market and verifying its energy efficiency performance through NABL accredited laboratories.*

⁶ *Constituted under Department of Expenditure (Ministry of Finance).*

5.1.4 Audit Findings

BEE conducts studies of various products and selects a product for S&L Scheme based on potential of energy savings, contribution of the energy consumed, and having high market penetration potential. It develops ‘Product Schedule⁷’ for each product in consultation with its Technical Committee⁸ and in harmony with the industry standards. The Product Schedules contain detailed terms of reference for manufacturers for the energy efficiency standards and procedures to be followed by them for availing BEE’s Star label for their models. For mandatory products, the Product Schedules are notified by the Central Government as Regulations in consultation with BEE.

Manufacturers of equipment/ products can participate in the scheme by registering with BEE. On the announcement of a standard for a product under S&L scheme, the manufacturer registered with BEE submit their application for registration of their model along with test report⁹ of energy efficiency performance from NABL¹⁰ accredited labs and other requisite information. After scrutiny of the applications, BEE registers the model and permits the Star rating¹¹. Once a Star rating is approved, the permittees can use the approved Star rated label on their models for marketing.

Day to day activities for implementation and enforcement of the Scheme involve scrutiny of applications for registration of models, check testing for the energy efficiency performance of registered models, verification of the labels used with the requirements specified in Regulations/Product Schedules, collection of labeling fee on production of the Star labeled models, verification of production data provided by the permittees, and enforcement action against defaulting permittees.

BEE engaged outside agencies as ‘Independent Agencies for Monitoring and Evaluation’ (IAMEs) for scrutiny of applications received for registration of models, check testing of the models, label verification and production data verification. Scrutiny in Audit revealed the following:

5.1.4.1 Engagement of inexperienced IAME

For carrying out tasks of scrutiny of applications for registration of models, check testing of Star labeled models, label verification and production data verification, different agencies viz., RITES Limited, Energy Efficiency Services Limited¹² (EESL) and CPRI¹³ (only for check testing), were engaged as IAME by BEE since September 2007.

⁷ *The Schedule contains detailed terms of reference for manufacturer towards the energy efficiency standards and procedures to be adopted under the S&L Scheme.*

⁸ *Technical Committee is formed by BEE for formulation of Energy Consumption Standards for products, which includes experts and stakeholders, comprising of representatives from industry, industry association, consumer organisations, academia, NGOs, R&D institutions, testing laboratories, government organisations and regulatory bodies.*

⁹ *From in-house as well as third party lab.*

¹⁰ *National Accreditation Board for Testing & Calibration Laboratories (NABL), since December 2014.*

¹¹ *Award based on energy saving performance.*

¹² *EESL is promoted by MoP, as a Joint Venture company of NTPC, PFC, REC and PGCIL.*

¹³ *Central Power Research Institute (CPRI) as EESL failed to carry out the Check testing.*

EESL, established in December 2009, was engaged as IAME by BEE in March 2010 for scrutiny of applications for registration, check testing, label verification, and production data verification. Audit observed that, during the period covered in audit, EESL carried out only the application scrutiny work and the other important works, such as check testing, label verification, and production data verification, were not carried out by them during contract currency i.e. upto November 2013. Thereafter, during the extension of the contract, only scrutiny of applications for registration was assigned to EESL. BEE had not produced to Audit any records showing their pursuance with EESL for these activities.

MoP/ BEE replied (January/March 2019) that they decided to engage IAME through open bidding in 2010, but could not find any agency. BEE added that they engaged EESL as MoP had set up EESL to act as an executing agency for BEE.

The reply is not acceptable as BEE did not produce any records for the bidding process adopted by them in 2010 for IAME. BEE did not monitor the work of EESL which resulted in non-verification of labels by EESL, and check testing work transferred to CPRI in October 2013 as discussed in subsequent para.

5.1.4.2 Check testing

Check testing of approved models to verify the energy efficiency of the products is the most critical activity of BEE under the S&L Scheme, because consumers pay high price for the Star label of BEE. If the models do not comply with the standard energy consumption levels prescribed by BEE, it would be a loss to the consumers.

The scheme document (May 2006) requires that the frequency of label verification test is to be determined by BEE depending on the nature of equipment and time required for testing. This provision was amended on 6 December 2013, which required BEE to pick up samples on random basis and buy the selected models from market for the check testing.

In case, a model fails in the first check test, BEE will buy two samples of the same model for second check testing within 15 days. If samples are not available in market, the permittee of the label will provide the samples within a month, otherwise check testing results of first sample shall be binding on them.

If a sample fails in second check test, BEE shall direct the permittee, under intimation to all State Designated Agencies (SDAs), that the permittee, should, within two months, correct the Star rating level on the label or remove the defects, or withdraw all stocks from the market or change the particulars displayed on advertising material. On failure of second check test, BEE shall also publish widely, for the benefit of the consumers, the name of permittee, brand name, model name or model number, logo and other specification and initiate further adjudication proceedings against the permittee and the trader under Section 27 of the EC Act.

Review of check testing vis-à-vis the requirements revealed the following deficiencies:

(i) Negligible check testing

As discussed in para 5.1.4.1, EESL failed to carry out the check testing entrusted to them. Against 21 products brought under S&L Scheme till March 2018, BEE engaged (October 2013) CPRI for check testing of only five¹⁴ products. Year-wise details of models approved, selected for check testing, actually check tested and models failed in respect of check tests carried out by CPRI during 2012-13 to 2017-18 is given in Table 5.1.

Table 5.1: Year-wise details of check testing by CPRI

Year	Models approved	Models selected	Models check tested	Models failed in first check test	Second check test status, in case first sample failed				
					Sample not available	Not taken up	Taken up	Failed	Under progress
(Figures in number)									
2012-13	3,675	0	0	0	0	0	0	0	0
2013-14	4,776	381	39	25	12	5	8	7	0
2014-15	7,073	0 ¹⁵	0	0	0	0	0	0	0
2015-16	4,148		0	0	0	0	0	0	0
2016-17	5,299	0	0	0	0	0	0	0	0
2017-18	7,108	170	12	7	0	0	7	0	7
Total	32,079¹⁶	551	51	32	12	5	15	7	7

Audit observed that:

- (a) BEE planned check testing of 1.72 per cent of approved models and actually check tested only 0.16 per cent during 2012-13 to 2017-18. Further, out of 51 models check tested, 32 models failed (63 per cent) in the first check testing. Interestingly, out of 25 models which failed in the first check testing during 2013-14, only eight models (32 cent) were taken up for second check testing and seven models (88 per cent) failed again.
- (b) Check testing carried out was done after an average 465 days of registration and most of the models failed in the check testing of 2013-14 and 2017-18, resulting in marketing of non-compliant models for long periods.
- (c) Majority of the models which failed in first check testing of 2013-14 did not undergo second check testing. All seven models which failed in first check test of 2017-18 did not undergo second check test even after 307 days to 383 days of the first check test (upto January 2019). As a result, check testing was not taken to its finality which affected enforcement action required, if any. There was nothing on record to indicate that BEE had pursued the matter with CPRI regarding second check testing. Audit

¹⁴ (i) Frost Free Refrigerator, (ii) TFL, (iii) Room AC, (iv) Direct Cool Refrigerator, and (v) Distribution Transformer.

¹⁵ BEE informed that sampling plan for the year 2014-15 and 2015-16 were made but copies of these sampling plans were not available on records. Management also informed that sampling plan 2012-13 and 2016-17 were not available on records.

¹⁶ 32,079 models: 15,627 models of mandatory products and 16,452 models of voluntary products.

found that similar Regulators¹⁷ in Australia and USA conduct the check testing and publish the report on six monthly/annual basis.

- (d) In respect of 24 models¹⁸ which failed during check testing in 2013-14, the permittees had marketed 3,92,751 Room Air Conditioners (Room ACs) and 1,47,485 Frost Free Refrigerators (FFRs) of these models at the estimated market value of ₹1464 crore¹⁹ till December 2015 since their registration without achieving the envisaged electricity savings. Similarly, in respect of the seven models of FFRs and Room ACs which failed during check testing of 2017-18 and did not undergo for second test checking till January 2019, the permittees had already marketed 2,46,193 FFRs and 23,752 Room ACs of these models till December 2018 since their registration, with an estimated market value of ₹744 crore²⁰ without achieving the envisaged electricity savings.
- (e) Check Testing Scheme (amended in December 2013) as well as the OM²¹ provide that if a permittee does not provide sample for second check testing, then the results of first check testing shall be final and binding. However, BEE did not direct permittees for accepting the results of first check testing in case where second check testing could not be done due to non-availability of sample i.e. 12 models of Room AC.
- (f) The OM prescribed the check testing of at least one sample of each model every year. BEE, however, carried out check testing of only 12 out of 16,557 models, registered during April 2015 to March 2018.

BEE stated (January 2019) that there was no provision for binding the results of check testing of first sample in the notification issued by the Central Government and added that they may consider to add the provision in future. MoP/BEE stated (March 2019) that the check testing was conducted for only few models due to non-availability of sufficient number of NABL accredited Labs, insufficient manpower in BEE and non-availability of samples in the market.

Audit appreciates the assurance of BEE regarding change in regulation about binding the results of check testing of first sample. However, the other replies are not acceptable in view of following facts:

- (a) BEE empaneled 4 to 10 NABL accredited labs from time to time exclusively for check testing on open tender basis but did not utilise these labs (except CPRI). Though CPRI had an annual capacity of testing 300 ACs and 160 Refrigerators (80 FFRs + 80 DCR), only 28 ACs and 23 refrigerators (22 FFR + 1 DCR) were check tested during 2013-14 and 2017-18. Hence, the deficiency in check testing was not due to shortage of labs.

¹⁷ *Greenhouse and Energy Minimum Standards regulator under Department of the Environment and Energy of Australian Government and Environmental Protection Agency in USA.*

¹⁸ *19 Room Air conditioners and 5 FFRs after considering second test failure (7 models), models not available (12) and models not selected (5) for second check testing.*

¹⁹ *Worked out based on actual price at the time of failure.*

²⁰ *Worked out based on actual price at the time of failure.*

²¹ *OM formulated by BEE in March 2015 contains the procedure to implement S&L scheme.*

- (b) Non-availability of samples in the market is a serious matter which should have been sorted out with the permittees in light of provisions of operation manual.

Thus, non-pursuance for timely amendment in the EC Act resulted in failure to bind the results of first test on the product in the absence of the sample to conduct second test which is tantamount to a favour to the permittees at the cost of consumers. The possibility of collusion with the product manufacturers can't be ruled out.

(ii) Deficiency in Operations Manual for check testing

Audit found that the following critical issues were not addressed in the OM:

- (a) Independent cross check testing of models by BEE, before issuing the certificate for Star rating, has not been prescribed. Evidently, majority of the samples failed in the check testing.

In fact, all the seven models which failed in 2017-18 check testing were registered with in-house test reports of the manufacturers. BEE however did not take any corrective action and continued to accept in-house test reports for registration of products. In countries like USA which faced the same vulnerability, third party certification of products prior to being labeled has been implemented since 2011.

- (b) Methodology of representative sample selection including geographical spread for check testing was not defined in the OM. As a result, adequate sample was not selected and CPRI, Bengaluru procured all samples from only two cities i.e. Chennai and Bengaluru in South Zone.

MoP/ BEE replied (March 2019) that they seek test report from accredited labs before registration of models and CPRI has limited geographical presence for the check testing facility in the country.

The reply is to be viewed against the following facts that:

- (a) Provision in OM/ Regulation did not require for only third party certification at the time of registration of product. Further, the check testing, after the registration, was negligible and, wherever carried out, it was after an average 465 days of registration. This led to the marketing of non-compliant models for long periods.
- (b) BEE utilised only the services of CPRI, Bengaluru out of 4 to 10 empaneled accredited labs for check testing which were spread across the country.

5.1.4.3 Inadequate efforts for Building Lab Capacity

BEE had the responsibility under the EC Act to promote testing facilities for the certification and check testing.

For XI Plan period, MoP approved (March 2011) outlay of ₹26 crore for Lab Capacity Building. BEE invited (October 2011) proposals from Government labs for the capacity

building. In total, 26 proposals from 10 labs were received for 15 products²². BEE released grants of ₹10.74 crore to only three²³ labs for eight products²⁴ (one mandatory-Tubular Florescent Lamp+ seven voluntarily products) and these labs utilised grant to the extent of ₹10.45 crore. BEE had not funded other labs covering largely test of mandatory products.

The fund available for lab capacity building for XI Plan was not utilised fully. Further, BEE did not utilise the above three labs (except CPRI for Refrigerator) despite release of grant of ₹10.45 crore for the lab capacity building.

For XII Plan period (2012-13 to 2016-17), MoP approved an outlay of ₹16 crore, but BEE did not utilise the fund for developing of required labs despite not having any empaneled labs for two²⁵ products having a volume of production and marketing of 1,19,005 units (Air Conditioners: cassettes/floor standing) and 28,38,508 units (inverter Air Conditioners) from 2015-16 to 2017-18 and claiming 770.74 Million Units as energy savings²⁶ of these products.

BEE replied (January 2019) that the creation of new facilities and augmentation of existing facilities in Government labs had long gestation period due to technology and infrastructure reasons. BEE added that they had decided not to explore private labs for augmentation through Government funding support on grounds of transparency. While accepting the non-utilisation of funds by BEE, MoP endorsed (March 2019) the views of BEE.

The reply of BEE is silent on non-utilisation of capacity generated through grants. Further, they attributed the negligible check testing to the inadequacy of testing labs.

5.1.4.4 Label Verification

OM requires BEE to check whether all models in market are registered with BEE in case of products covered under mandatory scheme, all registered models display the BEE's Star label, all models carrying the star label are registered in case the products are covered under voluntary scheme, fake labels are not being used on products, and BEE's Star labels are displayed on models as per requirement of the Product Schedule/Regulations. All these aspects are directed towards either protecting the consumers from misuse of the labels and/or ensuring energy savings under the S&L Scheme

Audit found that the label verification was not carried out by BEE/IAME, despite its criticality in the implementation and monitoring of the S&L Scheme.

²² *Induction motor, Distribution Transformer, Ceiling Fan, UPS, Inverter, LED, Battery, Room AC, Colour TV, Pump set, LPG stove, TFL, Refrigerator, CFL and stabilizers.*

²³ (i) CPRI, Bangalore (₹8.53 crore) (ii) CEC IIT Madras (₹0.82 crore) and (iii) NSIC, Chennai (₹1.27 crore).

²⁴ (i) Induction Motor, (ii) UPS, (iii) Ceiling Fan, (iv) LED, (v) TFL, (vi) Refrigerator, (vii) Inverter and (viii) Pump set.

²⁵ *Inverter Air Conditioners and Room Air Conditioners (Cassettes, Floor standing).*

²⁶ *Energy saving (MU) for ACs: [(Base Power Consumption – actual Power consumption) *Production*1200]/10⁹.*

BEE replied (January/March 2019) that label verification was a part of check testing though in limited numbers and, in the process of check testing, the label particulars are validated with the test results. BEE added that the process of check testing and label verification needed to be streamlined for which an MoU has since been signed with National Accreditation Board for Certification Bodies (NABCB). MoP did not offer any comment on this issue.

The reply of BEE is not acceptable in view of the following facts:

- Under the contract, EESL was required to provide BEE with the sample plan for label verifications and submit quarterly reports on the label verification work. Hence, the label verification was a critical activity which was to be performed independent of the check testing.
- In work order (October 2013) to CPRI, only check testing in two phases i.e. first check testing and second checking test in case of failures in first check test was mentioned and no label verification work was assigned under that work order.
- The check testing by BEE was negligible and ineffective (refer para 5.1.4.2).
- In Australia, the market surveillance/label verification are conducted regularly and Report thereon released on annual basis highlighting deficiencies like marketing of unregistered models, expired models, unlabeled models, models with obscured/wrong labels etc., besides the sampling details and size.

5.1.4.5 Non-fixing of QR code on Star label and short recovery of labeling fee

Quick Response (QR) code is used on every appliance to ensure the authenticity of the labels used in the market, so that misuse of Star labels can be obviated by empowering the consumer to retrieve and verify the technical specifications displayed on the Star label affixed on an appliance with ease from registered appliance database using a phone by scanning or a text message. This system has been implemented by China w.e.f. 1 June 2016.

BEE initiated (December 2010) implementation of QR code²⁷ technology for ensuring that non-compliant models are not sold in the market and to empower the customers to validate the label particulars directly from the BEE data base. It would also be helpful to BEE to capture product sales for data verification. But despite lapse of more than eight years, QR code on Star labels is yet to be implemented.

Due to delay in implementing the QR code system, BEE also could not promptly reconcile the production data with fee deposited by permittees for use of Star labels. This has also resulted in short recovery of labeling fee of ₹11.83 crore, as per detail given in Table 5.2.

²⁷ *This is an automatic identification and data capture technique which is used to identify materials without intermediation of human being.*

Table 5.2: Year-wise details of labeling fee due and recovered

(₹ in crore)

Year	Fee recoverable based on yearly production data	Fee actually recovered by BEE	Short(-) /Excess(+) recovery
2012-13	22.10	15.98	(-) 6.12
2013-14	21.41	21.68	(+) 0.27
2014-15	25.67	23.14	(-) 2.53
2015-16	29.63	25.96	(-) 3.67
2016-17	32.36	32.58	(+) 0.22
Total	131.17	119.34	(-) 11.83

MoP/BEE replied (January/March 2019) that they got conducted a study (February 2018) for the QR code on labels and expression of interest had since been invited from QR code implementing agencies. The manual reconciliation was underway to identify the discrepancies, if any and verification of labeling fee received got delayed in the absence of audited documents from the permittees.

The reply confirms that BEE had not implemented QR code system so far and also had not reconciled the labeling fee payments with the production data so far, though it was the only source of funding for the S&L Scheme.

5.1.4.6 Reporting of Energy savings

BEE reported an energy saving of 70 BU for XII Plan period, against a target of 13.95 BU (the working of the target was not available on record). The savings is to be seen in light of the fact that compliance to the energy efficiency standards was check tested by BEE for only 0.16 *per cent* of total registered models and majority of the models failed in the check test. Further, the savings were calculated with reference to the standard energy consumption of Star-1 products prescribed at launch of the products, instead of the efficiency standards that prevailed in the previous year.

Audit as a test check worked out the energy saving calculation as per above principle viz-a-viz energy saving calculation done by BEE in respect of three appliances (Room AC including cassette and floor standing, DCR and FFR), which contributed about 55 *per cent* of the total energy saving, in five years i.e. 2012 to 2017 and found that BEE had calculated excess²⁸ energy savings by 23,624.96 Million Units (equivalent to 61.50 *per cent*) for these three appliances.

MoP/BEE replied (March 2019) that the improvement in baseline value demonstrate the upgradation of market scenario which has resulted in due to vendors competing with each other to bring in newer technology. BEE further added that it has noted the suggestions of Audit and would seek views of Management Advisory Committee.

²⁸ (i) Excess Energy saving (MU) of Room AC: $\{[(\text{Base Power Consumption of Star 1 Model} - \text{Base Power Consumption of relevant Star Model}) - (\text{actual Power consumption})] * \text{Production} * 1200\} / 10^9$.
(ii) Excess Energy saving (MU) of DCR and FFR: $\{[(\text{Base Power Consumption of Star 1 Model} - \text{Base Power Consumption of relevant Star Model}) - (\text{actual Power consumption})] * \text{Production}\} / 10^6$.

Audit appreciates the assurance on the issue.

5.1.5 Conclusion

The S&L Scheme is a scheme launched for the efficient use of energy and its conservation. Despite lapse of more than 12 years from launching of S&L Scheme in 2006, BEE is yet to establish required checks and balances.

Check testing, which is critical for efficacy of the S&L Scheme, has been negligible, incomplete and ineffective. Lab capacity building was neglected, though funds were earmarked in both XI and XII Plan periods. Labs empaneled exclusively for check testing activity were not utilised optimally. Label verification activity was not taken up at all, though it was crucial in protecting the consumers from misuse of the Star labels. QR Code mechanism is yet to be streamlined for collection of correct labeling fee etc.

5.1.6 Recommendations

- Third party verification from approved labs may be considered to ensure correctness of Star label at the time of registration.
- Check testing and label verification, being core activities of scheme, may be adequately stepped up, completed in time and reports published on BEE's website.
- Creation and augmentation of lab capacity may be given due importance so that sufficient reliable labs are available for check testing.
- Mechanism for monitoring and ensuring compliance of internal guidelines regarding selection of models for check testing, label verification etc. may be put in place, to ensure that the objective of the scheme are met.