

Date : 04<sup>th</sup> January, 2024

To  
Shri J K Gupta  
Director & Head Textile - BIS  
New Delhi

**Subject : Representation regarding BIS Standard Baby Care : IS 17509 : 2021 & Sanitary  
Napkin : IS 5405 :2019**

Dear Sir ,

Reference to the BIS documents for Baby Diapers & Sanitary Napkin.

Unicharm India deals with hygiene products namely Baby Diaper (Mamy Poko) & Sanitary Napkin (Sofy). We had sent the documents to our R&D Center in Japan and have received some feedback for which we need your support for changes in the documents.

**Our Request:**

The following request from our end -

- (1) PH Value in Baby Diaper: IS 17509 : 2021 ( Page 2, 7.1 ) & Sanitary Napkin: IS 5405 : 2019 ( Page 2 , 7.1 ) :-** As per both the BIS Standards, PH value is defined between 5.5 – 8.0, whereas Unicharm India proposal is to increase the PH value to 3.0 – 8.5. Presently in our products namely MamyPoko Pants Baby Diaper PH value is 8.0 and in Sofy Sanitary Napkin is 7.0.

For the reference we would like to share other country standards related to the Baby Diaper

(pH standard)	BC
Japan	3.1~9.8
Taiwan	4.0~8.7
Korea	3.0~10.0
Indonesia	4.0~8.7

- (2) **Baby Diaper: IS 17509 : 2021 , Page 6 , B-2.2 ✘ Weight Balance** – BIS Standard for Weight Balance is 6300 gm ( Plate 605.3 gm + Weight 5694.7 gm ) , Cylinder Diameter – 40 mm , whereas Unicharm proposal for Weight Balance is 255 gm ( Plate 55 gm + Weight 200 gm ) , Cylinder Diameter – 60 mm.

**Reason – Diaper Manufacture Design Philosophy :** The performance of the diaper in terms of the absorption rate, leakage and re-wet under load depends upon the design of the diaper and since design of baby diapers of different manufacturer differ significantly, there should not be common test method to determine these value. For example, in case of baby diaper manufactured by Unicharm India, the pulp and super absorbent polymer (SAP) are intimately blended and the baby diaper design is such that absorbent core is pressed with a cross emboss. Such an absorbent core design cannot meet the criteria of underweight load. So, the testing method cannot be applied uniformly as it will differ from diaper to diaper because of design.

Its important to note that the no countries have any standard on this matter.

- (3) **Sanitary Napkin: IS 5405 : 2019 ✘ Weight Balance** – BIS Standard for Weight Balance is 1 kg , whereas Unicharm proposal is no loading.

**Reason – FC Manufacture Design Philosophy:** Products that use Mesh + SAP are advantageous because they are easier to meet standards even when weighted. Products that do not contain SAP & only non-woven fabric products are more likely to leak, and there is a high possibility that they will not be able to meet standards and will be subject to Shipping regulations.

Its important to note that the no countries have any standard on this matter.

In view of the above we therefore humbly request to consider our proposal on PH Value and Weight Balance for Baby Diaper and Sanitary Napkin.

We are always committed to supporting your esteemed organization to achieve their vision.

For, Unicharm India Private Limited



**Vijay Chaudhary**  
Managing Director