

Annex-21

Comments Format -

Sl. No	Name of the Organization	Clause/ Sub-Clause	Paragraph/ Figure/ Table	Type of Comment (General/ Technical/ Editorial)	Comments	Proposed Change	Justification
1	Havells India Ltd.	3.2.1	1	Technical	The definition of Detachable Cord is not given in IEC 60335-1	Detachable Cord— Flexible cord, for supply or interconnection, intended to be connected to the appliance by means of a suitable appliance coupler	It should be present for better clarity and should be as per existing IS 302 standard
2	Havells India Ltd.	3.3.7	3	General	The class 0 is not allowed in India for safety reason. Need to change this in other clauses of standards, wherever mentioned.	Class 0 construction is not allowed in India for safety reason	The note should be present as per existing IS 302 standard
3	Havells India Ltd.	3.3.8	2	General	Class 01 is not allowed in India for safety reason. Need to change this in other clauses of standards, wherever mentioned.	Class 01 construction is not allowed in India for safety reasons	The note should be present as per existing IS 302 standard
4	Havells India Ltd.	5.7	1	Technical	Ambient temperature should be as per Indian climate i.e., 27 + - 5	The tests are carried out in a draught-free location at an ambient temperature of 27 ± 5 °C.	Ambient temperature should be as per Indian climate i.e., 27 + - 5
5	Havells India Ltd.	8.1.1	2	Technical	This will demand the design changes and will impact the workflow	Test probe B of IS 1401 is applied with a force not exceeding 1 N, the appliance	The current appliances in market are as per the customer requirements

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						being in every possible position, except that appliances normally used on the floor and having a mass exceeding 40 kg are not tilted.	
6	Havells India Ltd.	8.1.3	1	Technical	This will demand the design changes and will impact the workflow	Instead of test probe B, and test probe 13, for appliances other than those of class II, test probe 41 of IS 1401 is applied with a force not exceeding 1 N to live parts of visibly glowing heating elements, all poles of which can be disconnected by a single switching action.	The current appliances in market are as per the customer requirements
7	Havells India Ltd.	20.2	6	Technical	This will demand the design changes	Compliance is checked by inspection, by the tests of 21.1 and by applying a force not exceeding 5 N by means of a test probe that is similar to test probe B of IS 1401 but having a circular step face with a diameter of 50 mm, instead of the non—circular face.	The current appliances in market are as per the customer requirements
8	Havells India Ltd.	26.1	1	Technical	This will demand the design changes	Appliances shall be provided with terminals or equally effective devices for the connection of external conductors.	The current appliances in market are as per the customer requirements. Need to keep it as per existing standard
9	Havells India Ltd.	29.1.4	1	Technical	We couldn't find the equivalent IS standard mentioned in the clause 29.1.4	For functional insulation, the values of Table 16 are applicable. However, clearances are not specified if	The current appliances are as per the existing IS standard

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 IS 15382 (Part 1) is identical to IEC 60664-1  
 IS 15382 (Part 4) is identical to IEC 60664-4

						the appliance complies with 1.9 with the functional insulation short-circuited. Lacquered conductors of windings are considered to be bare conductors.	
10	Havells India Ltd.	29.1.5	1	Technical	We couldn't find the equivalent IS standard mentioned in the clause 29.1.5	For appliances having higher working voltages than rated voltage, for example on the secondary side of a step-up transformer, or if there is a resonant voltage, the voltage used for determining clearances from Table 16 shall be the sum of the rated impulse voltage and the difference between the peak value of the working voltage and the peak value of the rated voltage.	The current appliances are as per the existing IS standard
11	Havells India Ltd.	29.2.1	1	Technical	We couldn't find the equivalent IS standard mentioned in the clause 29.2.1	Creepage distances of basic insulation shall not be less than those specified in Table 17. Except for pollution degree 1, if the test of 14 has been used to check a particular clearance, the corresponding creepage distance shall not be less than the minimum dimension specified for the clearance of Table .16.	The current appliances are as per the existing IS standard
12	Havells India Ltd.	29.2.4	1	Technical	We couldn't find the equivalent IS standard mentioned in the clause	Creepage distances of functional insulation shall be not less than those specified	The current appliances are as per the existing IS standard

					29.2.4	in Table 18. However, creepage distances may be reduced if the appliance complies with 19 with the functional insulation short circuited.	
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1	UL India	IS 302 / IEC 60335-1	All standard	General / Technical	The IEC has published latest version ( Edition 6 :2020) however IS 302 Part 1 is still based on older version of 2008.	Revision of IS 302 for aligning with IEC 60335-1:2020	Changes and updates with technology to be included in the standard as There had been significant changes like inclusion of battery operated appliances , EMI/EMC , Software evaluation etc
2	UL India	IEC 60335-2-3 ( Electric Iron)	All standard	General / Technical	The older version of IS 302-2-3 : 2007 should be completely replaced with IEC 60335-2-3:2022 version.	Revision of IS 302-2-3 with IEC 60335-2-3:2022	The new IEC version has updated requirements for DC operated appliances. Note: The mandatory certification requirement needs to be revisited in this case.
3	UL India	IEC 60335-2-8 ( Shavers , Clippers)	All standard	General / Technical	The older version of IS 302-2-8 : 1994 is very old one with many of requirements	Adopt IEC 60335-2-8 : 2022 version or updation of IS 302-2-8	The new technologies and devices needs to address the safety

		and similar appliances)			updated ( clauses 12, 19, 20, 21 etc) in IEC 60335-2-8 :2022		features.
4	UL India	IEC 60335-2-13 ( Frying Pans , Deep Fat Fryers)	All standard	General / Technical	IS 302-2-13 : 1994 version have updated requirements incorporated in IEC 60335-2-13 : 2021 version	Adopt IEC 60335-2-13:2021 version or updation of IS 302-2-13:1994	The new technologies and devices needs to address the safety features. Note: The India specific requirements with reference to the test methods and requirements should be evaluated for relevance.
5	UL India	IEC 60335-2-21 ( Storage Water Heaters)	All Standard	General / Technical	IS 302-2-21 : 2018 shall be updated with IEC 60335-2-21:2022 version.	Review temp limits and adopt IEC 60335-2-21:2022	The temperature limit of 99 degC shall be reviewed to align with IS 2082 requirements
6	UL India	IEC 60335-2-42 : 2021 ( Commercial Electric Forced Convection Ovens)	All standard	General / Technical	There is no existing BIS standard for this product. BIS may adopt IEC version as is	Adopt IEC 60335-2-42 :2021	There is no existing BIS standard for this product. BIS may adopt IEC version as is
7	UL India	IEC 60335-2-59 : 2021 ( Insect Killers)	All standard	General/ Technical	There are additional requirements included in IEC 60335-2-59:2021 version ( scope change , requirement for UV devices) which are not available in IS 302-2-59:1999	Either adopt IEC 60335-2-59:2021 or update IS 302-2-59 : 1999	UV devices are more prominent and should be addressed.
8	UL India	IEC 60335-2-74:2021 ( Portable	All standard	General / Technical	There is no existing BIS standard for this product. BIS may adopt IEC version as is	Adopt IEC 60335-2-74 :2021	There is no existing BIS standard for this product. BIS may adopt IEC

**Commented [T5]:** Current requirement in IS 302-2-21 : 2018 is the same as that given in IEC 60335-2-21:2022 (Cl. 24.102)

		Immersion Heaters)					version as is
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Note: All the standards to be reviewed for the India relevant considerations. It shall be strongly recommended to form working panel to review and provide if any India differences to be addressed in the standards while adopting.

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