

# Revised MRP Mandatory?

CA Bhavesh jhalawadia

CA Rishabh Shah



# Is affixing a revised MRP label compulsory?

There is a big question right now:

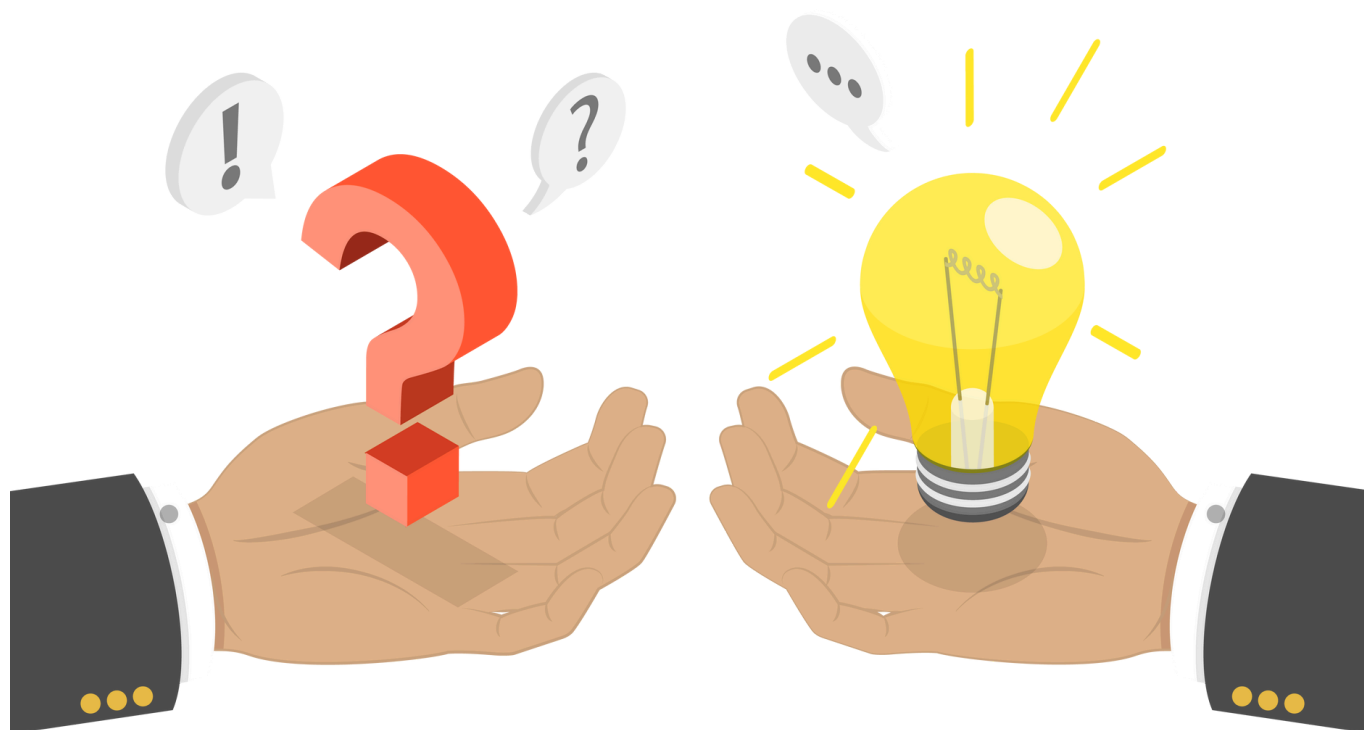
*Is revised-MRP stickering compulsory after the GST rate cut?*

It's a burning issue.



# Our View is

- It is not mandatory. The reason is that, under the Legal Metrology framework, the language used is “permitted/allowed,” not “shall/compulsory.”
- Further, to add legal support, there is a departmental clarification issued in the pharmaceuticals context; we can rely on that as a supporting base.





# Quick Analysis

## **NPPA Office Memorandum (12.09.2025):**

- Requires that the benefit of the GST rate reduction be passed on to consumers and that companies revise MRP w.e.f. 22.09.2025 through price lists and dealer communication.
- For stock already in the market, manufacturers/marketers who desire to re-label/re-sticker may do so in a phased manner to avoid shortages—this indicates permission, not compulsion.



## **CDSCO communications (11.09.2025):**

- Provide a “no-objection” to stickering of revised MRP (e.g., for specified classes of medical devices) and request State/UT Drug Controllers to expedite NOCs.
- 
- Again, the wording reflects that stickering is allowed/permitted, not mandated.

**Takeaway:** Passing on the price benefit is compulsory; physical re-labelling is an optional, permitted method for existing market stock.



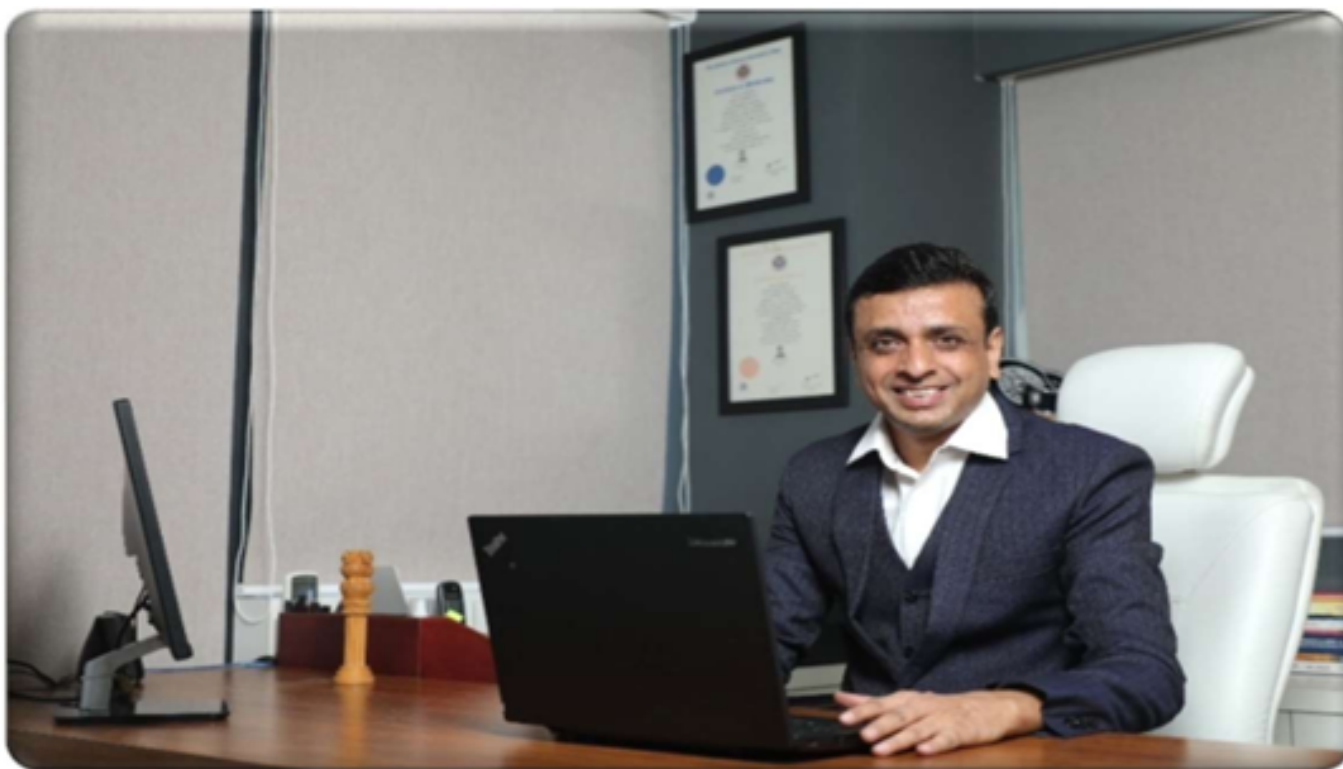
## Practical Checklists

1. Update price lists (Form V/VI) and share promptly with the trade.
2. Communicate reduced prices to distributors/retailers (emails, notices, POS updates).
3. Update MRPs on all new production/shipments after 22-09-2025.
4. If opting to re-sticker existing stock, plan a phased exercise and finish within 3 months (per CDSCO no-objection).
5. Maintain records of price lists and communications as proof that the benefit was passed on.

# Comment

**How to Revise MRP** — for that we have already given the article, so refer to that in this case.





**CA Bhavesh Jhalawadia**  
**Partner**



**CA Rishabh Shah**  
**GST Manager**

**Prepared By:**  
**S&J GST R & D Team**  
**Raksha Parikh – Head of GST R&D**



**Reviewed & presented by:**

**CA Bhavesh Jhalawadia (Founder of [gstsafar.com](https://gstsafar.com))**

**CA Rishabh Shah**

**(Simplifying GST for professionals and businesses)**

**Shah & Jhalawadia | Chartered Accountants**

**Head Office (Ahmedabad)**

**1001, 10th Floor, Landmark, Beside Titanium City Center  
Mall,**


**Anand Nagar Road, Satellite, Ahmedabad.**

 **+91 95865 30769 | 079 – 40392400.**

## **Branch Office (Mumbai)**

**4104, Rustomjee Eaze Zone Mall, Goregaon Mulund Link  
Road,**

**Opp, SBI and Ozone, Malad West,  
Mumbai, Maharashtra-400064.**

 **+9186554 84246**

**gst@shahjhalawadia.com**

 **www.shahjhalawadia.com**