

Date: 21.09.2020

FIA: 155

To,
The Hon'ble Collector,
DNH & DD,
Silvassa

Subject: "Atmanirbhar Bharat" Ease of Doing Business.

Hon'ble Sir,

It is the vision of Hon'ble Prime Minister Shri. Narendra Modiji to give thrust to promote make in India and "Atmanirbhar Bharat" and to ensure that our country should become biggest exporter across the globe and India should cater the need of the World. Due to this, our country will be able to attract more investment and which in turn will be able to generate huge revenue, large employment to the youth of our country.

Inline of the vision of Hon'ble Prime Minister many state has initiated various steps to attract investment in their state, have declared various schemes, and have implemented the various step for Ease of Doing Business. The various State Government and UTs have change their policies and instead of regulatory regime, they have adopted the system of facilitators to act as catalyst to attract more investment in their state.

So, we hereby appeal to the Administration of DNH & DD to facilitate Industries in terms of Ease of Doing Business to attract the Investment as it is done in neighbouring states Gujarat & Maharashtra. Even in Gujarat New Policy

Chandrakant M. Parekh
President

Rajan Aggarwal
Vice President

K.T. Parmar
General Secretary

page 1 of 9

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2020, specifically for MSMEs are allowed to start Business and can be given all required permission within span of 3 Years from the date of start of Business. Such Policy to facilitate MSMEs to start business without any hurdle at initial stage will create an atmosphere to be the hotspot for investment in future.

As our existing schemes are already exhausted and New Schemes are under preparation, we suggest the following suggestions and schemes should be incorporated to have simplified procedure of Ease of Doing Business and attract a huge investment, which in terms can generate a large employment in our Territory.

1. New investment / expansion

- a. Industry Promotion council should be reconstituted with a freedom to Federation of Industries Association to nominate their Nominee member.
- b. Present incentive schemes are not attractive in comparison of schemes prevailing in the neighbouring states, Maharashtra and Gujarat. Copy of which is herewith enclosed with.
- c. Capital investment subsidy should be in line with Maharashtra scheme dt. 16-09-2019.
- d. Interest subsidy, which is, at present, @ 5% with an upper limit of Rs 30L, should be increased to 7%, without any limit.
- e. The technical textile interest subsidy, which is at present @ 6%, with Upper limit of Rs.50'L for a maximum period of 5 years, should be enhanced to 7%, with upper limit Rs 2cr and maximum period should be enhanced to 7 years.

Page 2 of 9

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- f. These incentives should be available for expansion of existing industries also, without the limit of minimum requirement to expand by 50% on Gross Fixed Assets excluding land and Building.
- g. Period of benefits should be counted from the date of availing of the scheme.
- h. Since solar power is mandatory in DNH & DD, we request to give solar power subsidy as in line of Gujarat.
- i. **Waiver of Stamp duty.** New unit as well as unit undertaking expansion/diversification should be exempted from payment of stamp duty.
- j. **Power tariff Subsidy.** New micro, small and Medium enterprise should be given power subsidy for First 5 Years as in line of Gujarat or to the tune of Rs.1 per unit as given in Maharashtra. (Pg 20-21 of Maharashtra policy).

2. Stimulus for NA and Construction Activities

- a. NA should be granted instantly. Filed need not be sent other departments except three, PDA, Revenue and LRO. The NA permission should not be timed out.
- b. To modify the existing Land revenue regulation to simplify the existing procedure to avoid duplication of the work and to avoid delay in file movement.

(i) 7/12 abstract

The procedure as on today for entering name in 7/12 abstract as follows:



Page 3 of 9

Chandrakant M. Parekh
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c. After execution of sale deed applicant has to apply to mamlatdar to enter his/her Name in 7/12, Mamlatdar forward the same to Talati, talati give 15 days' notice and after 15 days name is enter into 7/12 it takes about 1 month time.

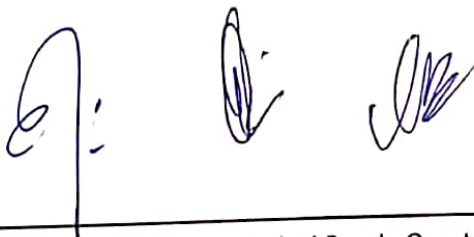
It suggested to be consider to provide online data of ownership transfer from sub-registrar office to Mamlatdar office and immediately after expiry of 15 mandatory days of notice period it should made available online on the name of New Owner. The Mamlatdar should send and ensure change of name with survey and settlement also within above mentioned time.

(i) Survey and Settlement.

The procedure as on today is to apply for site map is by attaching 7/12 abstract. So, one can apply only after one month as 7/12 abstract procedure is one month.

Our suggestions is that on basis of sale deed only survey and settlement should issue certified map that will enable to apply for construction permission.

(ii) Applicants should be allowed to start construction subject to undertaking that construction will be done as per prevailing DC Rules. It will help industries to save time and ultimately interest burden.



Page 4 of 9

Chandrakant M. Parekh
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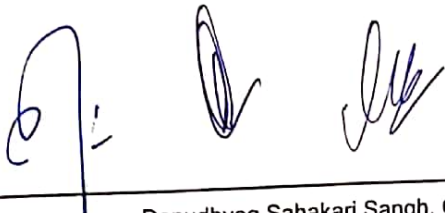
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- (iii) Fire NOC should not be required at the time of CP.
- (iv) Land record abstracts in the Form 7/12 should be available online, and Should be valid only for the day Which, it was downloaded. It will prevent chances of fraud and cheating.
- (v) Validity of the certified map is 30 days. Industries feel it is redundant. There should not any validity limit, as no change occurs in the certified map.
- (vi) Procedure for Fire NOC is undue stringent. These are simple copying the New Delhi practices, whereas, the demographic situation of New Delhi and DNH cannot be compared therefore we should focus on practices in our neighbouring states.

3. Power Applications:

- (i) Temporary Power should be release on the basis of sale deed.
- (ii) For permanent power application, no construction permission should be insisted, as at the time release occupancy certificate is required.
- (iii) Feasibility report should be made available online. At present lot of unexplained things and delays are happening. DNH PDCL must define non-feasible area and should display them on their website, which must be updated time to time.

4. Ease at PCC:



Page 5 of 9

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- a. The new classification into white, green, orange and red to be done as per latest guidelines of CPCB.
- b. Consents to establish and operate in white and green categories should be made available within 7 days of from the date of the application and should be valid for 15 years.
- c. Consents to establish and operate in orange category should be made available within 30 days of making of the application.
- d. A Consent fee at present is on cost of project, whereas MSME basis is investment in plant and machineries. Same criteria should be followed for consent fees also.

5. Working in Government Industrial Estates:

- a. In OI DC Daman and Diu, plots given on stimulus were allowed to get converted in free hold. It is required as get the assistance from financial institutions, free hold plot is first condition. such conversion should be allowed in industrial estates owned by the DIC in DNH also.
- b. Lease Transfer charges are very high as it is recovered on the basis of unearned premium. This should be review and should be charged reasonable to make such transfer viable.



Page 6 of 9

Chandrakant M. Parekh
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c. Recently, Gujarat Government has declared to give land for 50 years mortgage able lease at 6% lease rent p.a. on value. As Administration is also planning to develop new Industrial Estate with all infrastructure facility the same pattern of Gujarat should be adopted.

6. Availability of Water:

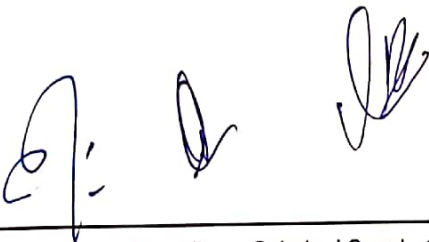
SIA, a constituent of this Federation had sponsored a detailed and exhaustive survey of water requirement for next thirty years in the UT. The report was presented by the Administration to the than Project. We request that actions to implement the project be speed up-as water table is deepening to an alarm level in the UT. We request to provide Industrial water to industries.

7. Approaching the UT and Traffic within the UT:

- a. Roads in private industrial estates are in very bad shape. Government should maintain these roads.
- b. Connectivity to Highway from Surangi via Sutrakar Road is need of the hour. We understand, Maharashtra Government has given its nod. Timely implementation will reduce traffic congestion in our Territory.

8. Fire and Emergency Services:

- a. Looking to the population and concentration of industries, we must establish Fire exit Emergency service centres at Dadra, Naroli and Sayli as early as possible with adequate staff and equipment.



Page 7 of 9

Chandrakant M. Parekh
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b. An NOC is required to be obtained from Fire department every year by the industries. Units which were constructed 20-25 years ago were as per the building and development rules prevailing at that time, National Building Code standards were not applicable and prevailing at that time. Such units are being asked to comply NBC. This is not only unfair and impractical but also not in accordance with law.

9. Smart City

- a. Since DNH and DD is merged and most of the Head office of Administration is at Daman. There is a need of connectivity between DNH and Daman by Public transport.
- b. Considering connectivity with Bombay and Surat. Airport in DNH with cargo and hanger facilities will help in growth of this tribal Union Territory.

10. Participatory Approach

Administration should appoint departmental consultative committees with nominations from the Federation to understand the views of industries at initial stage rather at curative stage.

The decision of Administration to provide time bound permission to industries is not very much encouraging as various departments are not following time bound system of delivery of services. Therefore it may pleased be consider to have a monitoring cell under chairmanship of Hon'ble Collector and due representation of industries and concern departments. To ensure



Page 8 of 9

transparency among the Industries & Administration it is also suggested to have periodical review meetings with circulation of ATR.

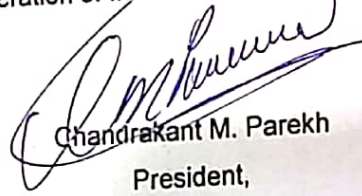
We are hopeful that Administration will look into these suggestions and will take a prompt action to bring a real stimulus for industries in D&NH.

We request an early appointment to hold a workshop to discuss these issues threadbare to chalk-out a concrete action plan for next three years.

Thanking you,

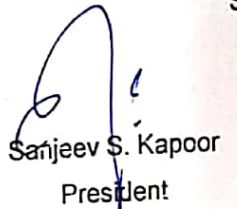
Yours' faithfully,

For Federation of Industries Association, Silvassa


Chandrakant M. Parekh
President,

Federation of Industries Associations, Silvassa and
Silvassa Industries and Manufacturers Association,
Silvassa.

K. T. Parmar
General Secretary


Sanjeev S. Kapoor
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Ajeet Yadav
President
DNH Industries
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CC: Copy forwarded to Hon'ble Secretary- Industry- DNH
and DD Administration, Daman

Page 3 of 3