

Coordination Group of



Silvassa Industries Association, Silvassa



DNH Industries Association, Silvassa



Silvassa Industries and Manufacturers Association, Silvassa

Dt: 15.09.15

To,
The Chief Inspector of Factories and Boilers,
DNH Administration
Daman

Subject : Objections and suggestions on notification dated 04.08.15 regarding revision of licence fees under the Factories Act, 1948

Sir,

With reference above cited notification, we submit our objections and suggestions on behalf of all three Associations as under:

1. Associations welcome the proposal to enhance the period licence from existing two years to ten years.
2. Increase in licence fees has no justification. Cost of manufacturing is increasing day by day and industries are not able to bear any further escalation. Also, there is no expenses by Administration to be incurred in making arrangement of licencing, hence, there is no financial burden on the Administration which is to be met. Hence, licence fees should be continues as it is.
3. The principle of adjustment of accrued interest has been over looked in the notification. When any payment is collected for longer period, payee is given benefits of adjustment which receiver would get out of interest by early payment. In the instant case, pay due

Recd
Am
15.9.15
Chief Inspector of Factories
Administration of Dadra & Nagar Haveli

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for 10th year would be received by the Administration 9 years in advance. Therefore interest accrued for these nine years should be passed to Factory, if not full, then at least partially. Therefore, fees table should be revised suitably.

4. Penalty of 25% on delayed application is very high. In fact, there should not be flat penalty. It must correspond to the various factors...like size of the organization, period of delay, past record of the Factory, and above all manifest of intention of deliberate delay. Therefore, we suggest that it may be reduced to minimum at the bank rate and not exceeding 15% in any case with discretion at appropriate level.
5. In addition to above penalty should be only on the fees accrued for delayed years. For example, there is delay and one deposit fees in third year. Therefore, percentage of fees of penalty should be only in respective of fees due for three years and not for other seven years.

We are sure that our above objections and suggestions will be considered suitably at your end and amendments will be revised accordingly.

Thanking you.

**Silvassa Industries
Association**

Sanjeev Kapoor
President

**DNH Industries
Association**

Ajit Yadav
President

**Silvassa Industries and
Manufacturers
Association**

C. M. Parekh
President