



SILVASSA

Industries & Manufacturers Association

Reg. No. 27/SIAMA /2011 Dt. 11-11-2011

Office No. 8, Danudyog Shopping Center,
Opp, Hirvavan Garden,
Piparia, Silvassa- 396 230.
(U.T. of Dadra & Nagar Haveli)

Tel. : (0260) 2640349

Cell : 076000758821, 07600673570

Email : sims_silvassa@yahoo.in

simasilvassa@gmail.com

Website : www.simadnh.org

President

Sh. C. M. Parekh

Vice-President

Sh. Atul Shah

Vice-President

Sh. Sunil Ijari

Vice-President

Sh. Ajit Deshpande

Hon. Secretary

Sh. Narendra Trivedi

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Sh. Ravi N. Pandey

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Joint Treasurer

Sh. Deepak Desai

Executive Committee

Sh. Utkarsh Mehta

Sh. Mahesh Chauhan

Sh. Atul Patel

Sh. Manish Ranka

Sh. R. P. Sinha

Sh. R. P. Sharma

Sh. S. N. Agarwal

Smt. Deepika Surma

Smt. Pinki Khemnani

Advisory Board Members

Sh. Vinit Mundra

Sh. Harshad Doshi

Sh. Nitin Kopikar

Sh. Pradeep Lele

Sh. Nirmal Jain

Dated 11th Nov. 2014.

To,

Sh. S.C.Sharma Ji

Dy. Director (IR/PL)

Ministry of Labour and Employment,

Room No. 306, Shramshakti Bhaavan,

Rafi Marg, New Delhi- 110001

Sub:- Objections against draft notification of Small Factories (Regulation and conditions of services) Bill 2014.

Dear Sir,

We the Silvassa Industries and Manufacturers Association (SIMA) represents the Industries of Union Territory of Dadra and Nagar Haveli. You may please also note that about 4000 Industrial Establishments are situated within our Union Territory and more than 90 % of the Industrial Establishments will be covered under this proposed Bill.

Therefore after a large consultation with our members we submit following suggestions which may be incorporated with proposed Bill.

1. While defining the definition of various terms the limit of the no of persons employed with a SMALL FACTORY may be considered 100 instead of 40.

2. With section h (b) while defining the term WAGES the amount paid against the overtime work should not be considered as part of wages.

3. With section 4 (1) the following provision may be incorporated " While finalizing the standard of inspection under this Act Dy. Chief Inspector of



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Factories the Opinion of Chamber of Industries Association should be also considered.

4. With section 5 (a) the permission of Labour Commissioner or Chief Inspector of Factories should be made compulsory before Inspection of any Industrial Establishment covered under this act.

5. With section 5 (d) at the time of seizure of records or copies of the establishments it should be mandatory for the Inspector to prepare a list of the records and seized and copy of the same should be handed over to the representative of employer.

6. With section 6 (2) After application by the Industrial Establishment the time limit for allotment of Labour Identification Number (LIN) should be specified.

7. With section 6 (5) It should be made mandatory for the Chief Inspector to intimate the employer about any irregularity (if being observed) within 15 days from the date of intimation and if Chief Inspector does not do so it should be deemed that the closure of unit is legal by the employer and the Registration Certificate to be automatically deemed cancelled.

8. With section 14 for payment of Bonus :- The time limit to pay the bonus under payment of bonus act should not be reduced from existing 8 months to 6 months.

9. With section 22 there should be provision that if the worker remains absent for more than 10 days without sanctioned leave or more than the leave originally sanctioned without prior permission of employer then said employee will lose there lien of service unless it submitted by the concerned employee to the employer it was beyond his/ her control to report on duty.



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We sincerely hope that you will go through the suggestions given by us and will incorporate same with proposed bill.

Thanking you,
With regards,

For Silvassa Industries and Manufacturers Association

(Ajit Deshpande)

Vice-President