

# ALL ODISHA RICE MILLERS ASSOCIATION

S-3/36 , Sec-A, Zone-B, Mancheswar Indl. Estate, Bhubaneswar-751010

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**By Email, Speed Post & Fax.**

Dated 14<sup>th</sup> February, 2016.

To,  
The Principal Secretary to Government,  
Labour & ESI Department,  
Government of Odisha,  
Bhubaneswar-751001.

Sir,

**Sub: Submission of objection on the Draft Odisha  
Factories (Amendment) Rules, 2015.**

This is in response to the Notification No.10824 Dt.23.12.2015 of Labour & ESI Department being published in Odisha Gazette No.53 on 2<sup>nd</sup> January, 2016 inviting any objection or suggestion before the expiry of a period of forty five days from date of publication in the Odisha Gazette from persons likely to be affected. Since the Rice Millers of Odisha are likely to be affected by the proposed amendment in the Rules, we hereby submit our suggestion/objection as follows:-

1. **Modification in the slab of total amount of Power installed (In K.W.) as proposed in the draft Schedule to sub-rule (1) of Rule 5.**

Total amount of Power installed (In K.W.)	
Existing slab in the Draft	Our Suggestion for change as
Not exceeding 10	Not exceeding 25
Exceeding 10 but not exceeding 50	Exceeding 25 but not exceeding 100
Exceeding 50 but not exceeding 100	Exceeding 100 but not exceeding 250
Exceeding 100 but not exceeding 200	Exceeding 250 but not exceeding 400
Exceeding 200 but not exceeding 400	Exceeding 400 but not exceeding 800
Exceeding 400 but not exceeding 800	Exceeding 800 but not exceeding 1500
Exceeding 800 but not exceeding 1500	Exceeding 1500 but not exceeding 2500
Exceeding 1500 but not exceeding 4000	Exceeding 2500 but not exceeding 4000
We do not suggest for any change in the remaining slabs.	

Contd.... 2..

2. **Modification in the slab of “Maximum number of persons to be employed during any one day of the year not exceeding” as proposed in the draft Schedule to sub-rule (1) of Rule 5.**

<b>Maximum number of persons to be employed during any one day of the year Not exceeding.</b>	
<b>Existing numbers of persons</b>	<b>Our Suggestion for change as</b>
Not exceeding 20	Not exceeding 25
Not exceeding 50	Not exceeding 75
Not exceeding 100	Not exceeding 150
Not exceeding 250	No change.
We do not suggest for any change in the remaining slabs.	

3. **Modification to the proposed substitution for sub-rule (4) to Rule-7:** We suggest that the option to apply for renewal of license for a term of five or ten consecutive calendar years be allowed at a discounted rate in stead of payment of five or ten times of usual annual license fees. A discount of 20% and 30% for five and ten years respectively may be considered as an incentive to opt for such option in the interest of better compliance.

4. **Short Notes:**

- a) Power is an essential part even for MSME units having a connected load upto 500 KW. The gaps between the slabs are to be more realistic at the initial slabs to allow use of power to meet the requirement.
- b) The increase in the limit of maximum number of persons employed at the small scale industry level is likely to generate more employment.
- c) Every investment has an interest bearing effect. Entrepreneur has to bear the loss of interest on payment of license fees for longer period while the Government will gain interest on such advance payment by the industry owner which could have been deferred by him. Even in Motor Vehicles Act, payment of tax equal to 10 years is treated as “One time tax”. Rebate in rate of license fees for a longer period will encourage better compliance and reduce cases of default.

We therefore, most humbly request you to kindly consider our submissions.

Yours faithfully,



Sd/-.  
(Santosh Kr. Agrawal),  
Chairman.