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Date: 9th November, 2019

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Pathik S. Patwari
Treasurer

Sub: Your email dated 18th October, 2019

Ref: Suggestions for New Industrial Policy 2021 - 2025.

1. Non Refund of GST/VAT
 - (a) We request that a 3 month time frame be mandated to complete validation / evaluation and audit and refunds are given to industries strictly within this time frame.
 - (b) Let there be simultaneous / cocurrent assessment of the all years to save time and give fast refunds of VAT/GST.
2. All the industrial units are covered under factories act. Yet at the time of a fatal accident industries are simultaneously charged by police under the section 304 of IPC. These double actions are a great hindrance to growth.
3. The recent announcement under the provision of GST allowing arrest of an assessee without show cause and/or FIR is a big concern for misuse.
4. There is very limited choice for industries to dump their hazardous waste and all the TSDF sites are operated by private operators leading to uneconomical costs for industries. As Gujarat is a chemical manufacturing hub, we request GIDCs to allot notified TSDF sites at various locations near chemical clusters for industries to safely and economically dispose their solid waste.
5. Industrial Estate of Gujarat had taken a lot of pain to establish the CETP/TSDF sites which are set up by industries themselves to resolve issues of pollution and keep our environment clean by spending a huge amount and are now working smoothly. The Industry of respective GIDCs is the member of the common facilities. To improve the facilities for the members the common facilities management have to upgrade the CETPs with latest technology available in the world



At present the Govt. is allowing 25% subsidy for the up-gradation of the existing CETP which is very low as compared to the expense incurred for the up-gradation of the CETP with the latest technology. We request the Govt. to consider our request and increase the subsidy to 75% so that the current CETP plants can be upgraded with fastest and latest technology. Even there is a long delay in releasing sanctioned grants, which also affect the setting up of new facilities.

6. The exhibitions held out of the state within India which are organized by the state level Apex bodies are only considered for the subsidy, whereas most of the exhibitions are on national level or even on International level organized within India by the Internationally recognized organizers, of course with the support of the state/central level apex bodies such as ITPO, MSME, NSIC, EXPORT PROMOTION COUNCIL, TRADE ASSOCIATION /COUNCIL etc. Such events should also be considered eligible for subsidy to MSME Units. Such Exhibitions attract a lot of foreign participants and visitors and always have a huge opportunity to promote exports.

At present only two expenses are considered for the subsidy i.e. stall rent & display material. Our MSME units do carry/send their own product to the exhibition venue and it costs substantial on transport expenses. Hence it is proposed that such Courier/Cargo expenses to send goods to the exhibition, at least for one side, also be considered for the reimbursement.

It is proposed to reimburse the air ticket expenses for at least one person per applicant.

MSME units have to incur the expenses on interpreter, and even for the digital presentation. Such expenses should to be covered for the reimbursement.

For Exhibitions in many countries, Govt. of India is not allowing the MAI Scheme. Govt. of India must also consider the countries not covered under MAI Scheme for the export promotion under the above scheme or cover entire world wherever the scope of exports is available.

7. **MDA Scheme :** The present revised MDA Scheme no 2 for the MSME Unit effective from 1.4.17 to 31.12.2019 to be continued for the next five years.
8. **Increasing the availability of credit:** The availability of short and (especially) long term credit is crucial to exporters. This is decisive for small and medium enterprise (SMEs), for which the credit constraints are more binding than for large firms. Since SMEs make up the large majority of firms in developing countries, improvement in this domain are necessary to favor export growth.



9. Industrial Development Corp to offer SMART GIDCs along with basic infrastructure.
- 10 IDCs to be mandated to permit Warehousing as business and should be allotted land in IDCs. This will facilitate Supply Chain for all the Manufacturing units. (Currently warehousing is not permitted in IDCs and industries have to pay extra for external warehousing)

We hope that you shall find above suggestions meeting to your requirement.

In anticipation of a positive cooperation from your side.

Thanking you.
Yours Sincerely,

Sachin Patel
(Chairman – GIDC Committee, GCCI – 2019-20)