



27<sup>th</sup> June, 2020 / ૧૫૪૨

To,

**Shri Parshottam Rupala**

Hon'ble Minister of State of Agriculture &  
Farmers Welfare, Panchayati Raj  
Govt. of India, Krishi Bhavan, Dr. Rajendra Prasad Road  
NEW DELHI-110001

**Sub: Proposed notification of Bio-Stimulant Act.**

Dear Sir,

Greetings from Gujarat Chamber of Commerce & Industry.

Gujarat Chamber of Commerce & Industry [GCCI] founded in 1949, is the apex trade and industry body of Gujarat which works to create and sustain an environment conducive to the growth of industry and trade in Gujarat. With more than 4000 direct members including more than 200 regional chambers and associations of Gujarat, GCCI serves the interests of all sectors of trade & industry of Gujarat State.

We have received a representation from Agri Input Foundation vide their letter dated 26<sup>th</sup> June, 2020 [ A copy of which is enclosed herewith]. Wherein they have narrated the difficulty MSMEs will be facing if the draft guidelines / notifications on Bio-Stimulant are confirmed and converted into an order.

We request you to take into the consideration that requirement of scientific data before seeking to license to produce Bio-Stimulant as per the amendment is strongly opposed as Bio-Stimulant refer to any substance or microorganism that stimulate the natural growth process of a plant. As the name suggests Bio-Stimulants have to be natural and not chemical.

**Durgesh V. Buch**  
President

**Natubhai Patel**  
Sr. Vice President

**Bhargav Thakkar**  
Vice President

**Sanjeev Chhajer**  
Secretary

**Dilip M. Padhya**  
Secretary (R)

**Pathik S. Patwari**  
Treasurer



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It may be noted that Bio-Stimulant products have no side effect and are beneficial to farmers.

We therefore request you to kindly intervene in the matter to ensure that Bio-Stimulants are not brought under Fertilizer Control Act-1986.

Hoping for a favourable action.

Thanking you and with regards,

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**Dilip M. Padhya**  
Secretary (R)

**Pathik S. Patwari**  
Treasurer



# AGRI INPUT FOUNDATION

804, SUYOJAN COMPLEX,  
NEAR HOTEL PRESIDENT, NAVRANGPURA, AHMEDABAD-380009  
Email: alf.biostimulants@gmail.com

Ref.No: AIF/BS/03  
26<sup>th</sup> June 2020

To,  
President,  
Gujarat Chamber of Commerce and Industry  
Ambica Mills, Gujarat Chamber Building,  
Ashram Road, Ahmedabad-380009

**Subject: Notification of Bio-Stimulant Act (Proposed)**

**Respected Sir,**

We have to bring to your kind notice that the proposed Notification of Bio-Stimulants to bring Bio-Stimulants into the Fertilizer Control Act (FCO) by the Department of Agriculture, Co-operation & Farmers Welfare is a big setback and road to progress to the SME & MSME Industry in India and Indian Farmers

Sir, the words of Hon'ble Shri Narendra Modi Ji – "Atmanirbhar Bharat" created a very positive aura with SME and MSME, as it suggests clearly that the domestic industry should play a more crucial role, the above planned act by Department of Agriculture, Cooperation & Farmers Welfare is absolutely in contrary to the same as its going to benefit and advantage to Multinational Companies.

The very fact that these organic / natural products like, Amino Acids, Fulvic Acids, Humic Acids, Seaweeds being proposed to be brought under the FCO Act are among some of the earliest agricultural inputs used by humanity. While these are still associated by many people with organic farming and organic gardening.

SME & MSME have been providing these organic / naturally sourced products at a very reasonable cost to farmers and these products help to improve farmer incomes by helping ensure that more of the products applied to crops are actually used by crops. Farmers are also able to secure higher prices for their produce when crop quality is better. Improved quality has a positive impact on storage and conservation, giving farmers more time to choose the best moment to sell their crops at advantageous prices.


By using this kind of products found No TOXIC effects on human, animal and nature.

In the proposed act the SME & MSME will have to generate University Field Trial data and toxicology data for 1 years, on multiple locations and multiple crops, considering that Micro Industry having just 4 products then the generation of such data will cost up to Rs. 1 crores and will take 3 to 4 years. SME & MSME will not be able to comply to the proposed act and importantly as the trials take 3-4 years hence we foresee a lot of job lost.

In these Covid Crises the SME and MSME sector is already struggling, the proposed act on Bio-Stimulants will add to their challenges to survive.

We would therefore request you to please intervene in the matter to protect the SME and MSME and Indian Farmer.

Yours sincerely,  
FOR AGRI INPUT FOUNDATION

  
Rajit M. Choksi  
President