

MINUTES OF THE MEETING FOR OBTAINING FACTUAL STATUS ON THE ISSUED RAISED BY THE FEDERATION OF INDUSTRIES; MEETING HELD ON 15-11-2016, 11.00 AM AT SECRETARIAT, SILVASSA, UNDER THE CHAIRMANSHIP OF SECRETARY (INDUSTRIES)/DEVELOPMENT COMMISSIONER, UT OF DNH

The above meeting was held on 15-11-2016 at 11.00 AM under the Chairmanship of Secretary (Industries)/Development Commissioner of UT of Dadra & Nagar Haveli. The list of the Participants is as per "Annexure-I" enclosed herewith. The consolidated statement showing detailed Point wise Comments/Reports submitted by all Departments excluding CEO (DP) and Police Department are also enclosed in "Annexure-II".

At the outset Secretary (Industries)/ Development Commissioner welcomed all the representative of Federation of Industries and other officers of Administration of Dadra & Nagar Haveli. The Point Wise proceedings were conducted and after thread bare discussion the same are minuted as under.

POINT NO. 1, 2, 3, 4, 5, 6, 19 & 27:- REGARDING CONSTRUCTION & REPAIRING OF ROADS:-

The Federation informs that some of the roads at Dadra Check Post to Demni Road Canal, Demni to KKalpana Industries, Dadra to Bluestar Ltd. and other roads in Industrial areas are in very bad shape. As reported by the department re-ashphalting is done which is not proper. After detailed discussion it was decided that physical inspection of all such roads mentioned at point 1 to 6 shall be carried out by concerned authority i.e. PWD Road/CEO(DP)/SMC along with representative of nearby Industries of their respective jurisdiction and report of the same be submitted within 2 days. The repairing/patch work shall be completed within One (1) month. The construction of the work shall be carried out with assurance of quality construction, so that the life span of such road shall be extended up to minimum of 5 years. The maintenance/guarantee clause of 5 year shall be included while awarding work contract by the concerned authority.

(Action: - PWD Road, CEO (DP), SMC)

POINT NO.7 - REGARDING INSERTING CONDITION ON SURCHARGE IN THE AGREEMENT WITH OPEN ACCESS CONSUMERS AND OTHER RELATED MATTERS:-

In this regard the DNHPDCL informed that the DNHPDCL had filed an appeal before JERC for the implementation of additional Surcharge and JERC has issued an order for the recovery of 47 paisa per unit as additional surcharge from the Open Access Customers. By challenging the order of JERC, the Open Access customer has filed an appeal before Appellate Tribunal of New

Delhi for which hearing will be held on 17.11.2016. The matter will be reviewed further on outcome of the order of APTEL.

(Action: - DNHPDCL)

The member of Federation represent that DNHPDCL had filed the petition for recovery of additional surcharge of Rs. 1.07 paisa w.e.f. 1st April 2017. But in order Honourable JERC has ordered for the recovery of 47 paisa per unit as additional charge from Open access consumer w.e.f. 10th October 2016. So it was suggested by Industries that DNHPDCL should agitate against the order of Honourable JERC for both i.e. recovery of balance 60 paisa and from 1st April 2016, so that burden to that effect should not be passing on to other segment of consumers. It was decided that the DNHPDCL will examine the same in suitable time frame and report.

(Action: - DNHPDCL)

POINT NO. 8 & 14 - REGARDING SURRENDER OF POWER BY DNHPDCL AND OTHER RELATED MATTERS:-

In this regard DNHPDCL informed that on implementation of Open Access in the Dadra and Nagar Haveli about 300 MW power has been drawn by the Open Access Customers through Power exchange i.e. IEX. Due to this there is a surplus of power which was not scheduled by DNHPDCL and there is payment of fixed cost to the generators. The DNHPDCL has also processed the proposal to surrender costlier power and their implication in the future which is pending for discussion with the Competent Authority of DNHPDCL. In this connection it is to submit that, DNHPDCL has procured 200 MW power from M/s. EMCO Energy Limited by following Competitive bidding process as per the guidelines of Ministry of power and signed PPA for Seven (7) years and Three (3) months since April 2013. Three years has already been completed and still Four (4) years are remaining to complete the contract as per the terms and condition of PPA and if we desire to surrender the power at this juncture the fixed cost implication shall be payable for another three years by the DNHPDCL to the generator which will also cause an extra burden to the DNHPDCL for a tune of approximately Rs. 125 Crore.

The members of Federation represent that as big chunk of power may be idle due to migration of big Industries in Open access mechanism and due to this DNHPDCL has to bear the cost of stand alone power by paying minimum fixed charges. In this scenario DNHPDCL should explore the possibility of surrendering surplus power to avoid the unnecessary burden of fixed charges from other small consumers. It was decided that the DNHPDCL will examine the same in suitable time frame and report.

(Action: - DNHPDCL)

POINTS NO. 9 - DEVELOPMENT CONTROL RULES 2015:-

1. Federation represented that due to increase in side set back/margin from three sides there is a reduction of permissible ground coverage. They suggested for reduction in side set back from three sides. In this regard, the representative from the PDA informed that the matter was already discussed in the PDA Board and as per the decision taken by the constituted committee it was not found feasible. However, after the detailed discussion it was decided that the matter will be again put up in technical committee for review of the points.

(Action: - PDA/SMC)

The Federation represented that in such committees of various concerned departments the representative of Industries should be involved at the time of framing the guideline and policy so that implementation shall become easy and concern of Industries can be examined and be dealt with at the time of framing the guideline and policy. However, after the detailed discussion it was decided that the possibility may be explored for inclusion of such members.

(Action: - PDA/SMC)

2. Federation represented that the Industrial plots abutting on 18 meters road and above public road are impractical. They suggested to remove the above condition, the representative from the PDA informed that the matter was already discussed in the PDA Board and as per the decision taken by the constituted committee it was not found feasible. However, after the detailed discussion it was decided that the matter will be again put up in technical committee for further review of the points.

(Action:- PDA/SMC)

The PDA was also requested to examine the practice, guidelines and norms prevailing and adopted by the neighboring states to provide conducive and investment friendly atmosphere.

(Action:- PDA/SMC)

3. Federation represented that while preparing draft amendment the stake holders shall be consulted. In this regard, the representative of the PDA informed that it is being done and the same will be ensured by the department in future.

(Action:- PDA/SMC)

POINT NO. 10 - REGARDING MORTGAGE REGISTRATION STAMP DUTY:-

Federation suggested that cap be fixed on the Stamp duty on registration of the mortgage deed from existing 1% to 0.25% in line with neighbouring states. After detailed discussion it was decided that matter will be examined by Revenue department.

(Action:- Collector, RDC(S), Mamlatdar, Sub-Registrar)

1. It was brought to the notice that in Maharashtra the cap limit is 5 lakh and in Gujarat it is 3 lakh maximum and so if we keep the cap on Stamp duty on mortgage deed the Administration will earn revenue as at present mortgage deeds are registered at Mumbai. After detailed discussion it was decided that matter will be examined by Revenue department.

(Action:- Collector, RDC(S), Mamlatdar, Sub-Registrar)

2. It was suggested by Federation that the circle rates which are being fixed are not having any base and logic because the circle rate in any village are same without considering the location, topography etc. and so circle rate should be revised survey number wise and should be fixed considering the above factors. After detailed discussion it was decided that matter will be examined by Revenue department.

(Action:- Collector, RDC(S), Mamlatdar, Sub-Registrar)

POINT NO. 11- (1) (2) - STAMP DUTY & CIRCLE RATE:-

The issue of Stamp duty was already discussed & decided as above Point No. 10. As regards Circle Rate it was decided that the suggestion of the Federation shall be taken into account.

(Action:- Collector, RDC, Mamlatdar, Sub-Registrar)

POINT NO. 11 (3) - NEED OF SURRENDERING POWER BY DNHPDCL:-

This issue is already discussed and decided as per point No. 7.

(Action:- DNHPDCL)

POINT NO. 11 (4) - RATIONALIZATION OF FSI:-

Federation suggested for relaxation of FSI. The representative from the PDA informed that the same have been done vide the Amendment in Clause 27 Table-11 for setback, Ground Coverage, FSI and Permissible building height for General Industrial Zone which was Notified vide Notification No. DNHPDA/DCR/AMD/FSI/2014/1175 dated: 12/08/2016.

(Action:- PDA/SMC)

It was suggested that maximum ground coverage norms for Industrial area should be examined which are adopted by the nearby states to ensure that maximum ground coverage is made available to the Industries at par with the Industries of nearby state. However, after the detailed discussion it was decided that the matter will be examined.

(Action: - PDA/SMC)

POINT NO. 12 - RE-CONSTITUTION OF THE ADVISORY COMMITTEE AND INCREASE THE INCENTIVE IN INVESTMENT PROMOTION SCHEME.

Federation suggested that the members from the Federation/Industries Association of DNH be nominated in Advisory Council. In this regard, the proposal has been put up by DIC on 08.11.2016 for re-constitution of Advisory council with nomination of Federation/Industries Association members. As regards increase in incentive for Investment Promotion Federation/Industries Association members will furnish Notification of the neighboring state and comparison thereof with DNH Scheme to decide the matter.

(Action:- Federation/All Industries Association/GM(DIC))

POINT NO.13 - REGARDING GRANTING OF NA INSTANTLY, FILE NEED NOT SENT TO OTHER DEPARTMENT EXCEPT PDA, REVENUE & LRO AND NO RENEWAL OF NA

Federation suggested that (a) NA should be granted instantly and Files need not be sent to other departments except three i.e PDA, Revenue and LRO and it once granted should not require renewal. At present it is required at interval of every five years. After detailed discussion it was decided that the matter will be examined by Revenue department.

(Action: - Collector, RDC(S), Mamlatdar)

(b) This point of Circle rate is already discussed and decided as above.

(Action: - Collector, RDC, Mamlatdar, Sub-Registrar)

(c) Federation suggested that construction be allowed immediately after submission of the application of construction permission on the basis of undertaking. After detailed discussion it was decided that the matter will be examined being a policy decision.

(Action: - PDA/SMC)

(d) **Federation** suggested that the Fire NOC should not be insisted upon for construction permission. After detailed decision, it was decided that the matter will be examined by Fire department and will report accordingly.

(Action: - Fire & Emergency Service)

It was submitted by Industries that NBC guidelines has been adopted by PDA which is not proper because it is guideline and not the rule. It was also submitted that the Fire & Emergency Service norms framed and followed by local Fire & Emergency Service are not practicable and it was suggested that fire safety norms followed by state of Gujarat & Maharashtra should be examined as they have expertise in the subject and Fire & Emergency Service of the neighboring states are having vast experience in handling such mishaps. After detailed decision, it was decided that the matter will be examined by Fire department and will report accordingly.

(Action: - Fire & Emergency Service)

(e) The suggestion of common checklist for construction permission both for SMC & PDA was unanimously agreed upon by all concerned and accordingly both the departments will furnish status report accordingly.

(Action: - PDA/SMC)

(f) The issue of FSI relaxation was already discussed.

(Action: - PDA/SMC)

(g) **Federation** suggested for availability of 7/12 online. In this regard after detailed discussion, it was decided that the matter will be examined by Revenue department.

(Action: - Collector, RDC(S), Mamlatdar)

(h) **The** suggestion of validity of certified map beyond 30 days is unanimously agreed upon by the PDA/SMC for further examination.

(Action: - PDA/SMC)

It was suggested by the Federation that as 7x12 are visible online, it is not necessary for PDA & SMC to insist for latest 7x12 because if they require they can cross verify online. However, after the detailed discussion it was decided that the matter will be examined and put up.

(Action: - PDA/SMC)

(j) The issue of Fire NOC is already discussed.

(Action: - Fire & Emergency Service)

(k) Federation suggested that construction permission should be granted online. PDA informs that online building permission management system is already implemented by the Authority. It was decided that SMC will also implement the same.

(Action: - PDA/SMC)

(l) As regards mismatching of certified map of Land Record with map of PDA the issue is already resolved by the PDA.

(Action: - PDA/SMC)

(m) As regard issue of the penalty it is clarified by the department that the penalty are being taken as per the DCR 2014.

(Action: - PDA/SMC)

Federation suggested that after submission of application for granting construction permission the applicant should be allowed to start the construction as per the norms of DC Rules 2014 and if applicants start the construction and is not violating any norms of DC Rules the question of charging penalty does not arise. The penalty should be charged only in case there is any violation of DC Rules norms and the penalty should be charged only for the illegal area which is constructed in violation of the norms of DC Rules and not for entire area of the buildings. After detailed discussion it was decided that the matter will be examined being a policy decision.

(Action: - PDA/SMC)

(n) As regards issue of part occupancy department clarified that the provision of part occupancy is already in operation.

(Action: - PDA/SMC)

POINT NO. 15 - ISSUE RELATED TO PCC:-

Representatives from PCC were not present. It was decided that the department may examine the points pertaining to them as a part of Ease of Doing Business. The point wise comments of PCC are enclosed herewith in Annexure-II.

(Action: - PCC)

The Federation suggested that as there are number of issues in respect of PCC a separate meeting to resolve the issue of PCC should be held where in all the issues can be discussed and can be resolved. It was decided that the same will be organized.

(Action: - PCC)

POINT NO. 16 – ISSUE RELATED TO FINANCE & TAXATION:-

Representatives from VAT were not present. It was decided that the department may examine the points pertain to them as a part of Ease of Doing Business. The point wise comments of VAT department are enclosed herewith in Annexure-II.

(Action: - VAT)

The Federation suggested that as there are number of issues in respect of VAT a separate meeting to resolve the issue of VAT should be held where in all the issues can be discussed and can be resolved. It was decided that the same will be organized.

(Action: - VAT)

POINT NO. 17 – ISSUE RELATED TO GOVERNMENT INDUSTRIAL ESTATES:-

The issue related to transfer of lease right, transfer fee and conversion of lease hold land to free hold land has been discussed. It was informed to house by DIC that the delegation of power to the Collector has been recently approved by the Honourable Administrator. Accordingly, department has put up all files to GM(DIC) for onward approval of the Competent Authority.

(Action: - GM (DIC))

However, Federation suggested to consider their request for converting the lease plot to free hold plot by charging one time premium to avoid the hardship. It was decided that being a policy matter the subject file which is already put up will be send to competent authority for deciding the issue.

(Action: - GM (DIC))

POINT NO. 18 – ISSUE RELATED TO AVAILABILITY OF WATER:-

Federation suggested that a detailed and exhaustive survey of water requirement for next 30 years in the UT shall be carried out. After detailed discussion it was decided that the same shall be examined and put up.

(Action: - PWD (Irrigation)/Water supply/PDA, SMC)

POINT NO. - 20,21,22 & 23 ISSUE RELATED TO HR & LABOUR MATTER, EXIT POLICY OF EOU, EASE OF SKILL AVAILABILITY, ACCIDENT HANDLING, CONTROVERSY OVER STANDING ORDER:-

The issue related to amendment in chapter 5 (d) of the Industrial Dispute Act-1947, Controversy over Standing order have been discussed in detail. It was decided that the matter will be put up for concurrence of the GOI.

(Action: - Commissioner Labour/Deputy Commissioner Labour & LEO)

The issue of skill availability was discussed in detail and after detailed discussion it was decided that to bridge this gap and get skilled manpower, skill development activities/seminars/training be organized in consultation with the Industries Association from time to time.

(Action: - ITI Principal/ Federation Association)

Federation suggested that the Industrial accidents are not intentional and therefore proceeding under IPC should not be conducted and the provision of the Factory Act-1948 shall be taken. The matter was discussed in detail and it was decided that the course of action under the provision of Factories Act-1948 will be implemented and if needed the prosecution sanction will be obtained by the Police department under the Factory Act-1948.

(Action: - CIFB & Police department)

POINT NO. 24 - ISSUE REGARDING FIRE & EMERGENCY SERVICES :-

The proposal for setting of Fire Stations at Dadra, Naroli & Sayli will be examined by Fire department. The issue of applicability of NBC Code to old constructed buildings will also be examined by fire department. Also as discussed Fire NOC shall not be insisted in advance while granting NOC for storage of explosive substance by Collector office and this matter will be examined for necessary action.

(Action: - Collector & Fire department)

POINT NO.25 - ISSUE REGARDING LAW & ORDER:-

It was discussed in detail and decided that Police department will give cooperation as and when needed.

(Action: - CIF&B, Police department)

POINT NO. 26 & 27 - ISSUE REGARDING WORKING IN PRIVATE INDUSTRIAL ESTATES & PARTICIPATORY APPROACH:-

These issues are already discussed as above.

(Action: - GM (DIC))

OTHER POINTS-IN ADDITION TO ABOVE, THE FOLLOWING POINTS ARE ALSO DISCUSSED AND DECIDED ACCORDINGLY.

1.The Revenue department will accept Sanad executed after 7th July-2016 and the NA order will be accepted prior to 7th July-2016 while granting construction permission and occupancy certificate by SMC/PDA.

(Action:-All Revenue Department/ SMC/PDA)

2. It was suggested by the Federation that the DNHPDCL shall adhere to guidelines issued by JERC while dealing with the issues of Power distribution, various clearance, and release of power from time to time and follow the SOP. The Federation also suggested for toll free helpline exclusively separate for DNHPDCL. After detailed discussion the suggestion of Federation is accepted by the DNHPDCL.

(Action:-DNHPDCL)

3. It was suggested by the Federation that, in view of earlier minutes of the Collector in the year 1997, the fencing of land, leveling of land, excavation of land, bore well in land shall also construed towards NA commencement. The house unanimously agreed upon the suggestion of the Federation and matter will be examined for necessary action.

(Action-All Revenue Department/PDA/SMC)

4. It was suggested by the Federation that, in every department, the time limit has been agreed and prescribed for granting permission, NOC, Registration and consent as various clearances for establishment and operation of the Industries. So if department or concerned office fails to grant such clearances in prescribed time limit then entrepreneur will presume that the permission and clearances have been granted under deemed provision and Industries can go ahead with establishment and operation of their Industrial unit. In this regard it was decided that the all departments shall examine the same and will report in time frame.

(Action:-All Departments)

3. The member of Federation submitted that after the regime of Electricity Regulatory Commission, the DNHPDCL has to strictly adhere the provision of supply code notified by Joint Electricity Regulatory Commission for state of Goa and UTs and in our UT of DNH the provision of supply code is final and in force. No order, direction, guideline can be issued by the local administration which are in violation of the notified supply code and other regulation and guideline of JERC. It was decided that the DNHPDCL will examine the same and report timely.

(Action:-DNHPDCL)

6. It was also strongly represented that the time limit as prescribed in the Standard of Performance (SOP) notified by JERC should be strictly followed and all the works should be completed in the prescribed time limit. It was also submitted that at the time of deriving and calculating the FPPA the representative of Industries should be involved to avoid any misunderstanding and also to avoid any error in calculation. It was decided that the DNHPDCL will examine the same and report timely.

(Action: - DNHPDCL)

7. It was brought to the notice of gathering by the Federation that in the Industrial estates many illegal tea stalls have encroached the Industrial roads and are running their tea stall illegally and due to this major portion of the roads are illegally occupied by such tea stalls and other hawkers. Due to this, Industrial roads have become narrow and causing traffic problems and it may also lead to accidents as they are staying with their families on the Industrial road. Though, requirement of tea stall at Industrial area cannot be denied but for that suitable places should be identified and allotted to them by the concerned Industrial society. So it was decided that Collector, SP, SMC shall remove such encroachment and necessary arrangement for such tea stalls can be made in consultation with nearby Industries.

(Action-Collector/SP/SMC)

8. The Federation suggested that to facilitate the Industries and to implement the scheme of Make in India in its true letter and spirit such meetings should be called at regular intervals and administration should keep eye and monitor on the disposal of applications in prescribed time limits by the concerned department. It was decided that the periodic meetings will be organized accordingly.

(Action:-GMDIC)

9. To provide conducive atmosphere and ensure to have Ease of Doing Business in DNH, the administration should ensure that the representative of Industries are involved in framing the Policy/Guideline and constant interaction between administration and Industries should be ensured so that grievance of the Industries are redressed time to time, so that Industries can start their activities at the shortest span of time.

(Action: - Collector/RDC(S)/All Revenue department/SMC/PDA)

All departments concerned shall send Action Taken Report within a time frame of Ten (10) days from the date of issued the Minutes to undersigned for onward perusal of Honourable Administrator.

The meeting ended with the vote of thanks to the Chairman. This is issued with the approval of Secretary (Industries)/ Development Commissioner.



**General Manger
District Industries Centre
Dadra & Nagar Haveli
Silvassa**

TO ALL OFFICERS WITH A REQUEST TO SEND ACTION TAKEN REPORT WITH REASONABLE & CLEAR TIME FRAME:-

1. The Executive Engineer. P.W.D. Road, D&NH, Silvassa.
2. The Chief Executive Officer(DP), D&NH, Silvassa
3. The Executive Engineer DNHPDCL, DNH, Silvassa.
4. The Member Secretary(PDA), D&NH, Silvassa
5. The Mamlatdar, D&NH, Silvassa
6. The RDC(S), D&NH, Silvassa
7. The General Manager(DIC), D&NH, Silvassa
8. The Chief Officer, (SMC), D&NH, Silvassa
9. The Survey & Settlement Officer, D&NH, Silvassa
10. The Director, Fire Department, D&NH, Silvassa
11. The Land Revenue Officer, D&NH, Silvassa
12. The Member Secretary PCC, D&NH, Silvassa
13. The Deputy Commissioner, VAT, D&NH, Silvassa
14. The Executive Enggineer, P.W.D. Irrigation, D&NH, Silvassa
15. The Deputy Director Transport, D&NH, Silvassa
16. The LEO, D&NH, Silvassa
17. The Superintendent Collector, D&NH, Silvassa

18. The Superintendent Police, D&NH, Silvassa

19. The Principal, ITI, DNH, Silvassa.

20. The CIF&B, DDDNH.

21. The President/Vice President/Secretary, Federation of Industries Association

22. The President/Vice President/Secretary, Dadra & Nagar Haveli Industries Association

23. The President/Vice President/Secretary, Silvassa Industries and Manufactures Association

24. The President/Vice President/Secretary, Federation of Industries Association, Silvassa.

COPY FOR INFORMATION TO:-

1. PS to Honourable Administrator, D&NH, Silvassa
2. PA to Development Commissioner, D&NH, Silvassa
3. PA to Finance Secretary, D&NH, Silvassa
4. PA to All Concerned Secretaries, D&NH, Silvassa
5. PA to Collector, D&NH, Silvassa

STATEMENT SHOWING DETAILS OF COMMENTS/REPORTS ON POINTS OF REPRESENTATION OF FEDERATION SUBMITTED BY ALL DEPARTMENTS

No.	* Points	Department concerned/ Comments
1	<p>Please refer to our letters dated 25/08/2016 and 26/08/2016 on above subject, copies of which are enclosed for your ready reference. We appreciate that PWD has taken some steps, whereas roads belonging to Zila Panchayat have become bad to worse, They are giving open invitation to road accidents. Road from Dadra check post to Demni via canal is a case in the matter. May Federation request you to take prompt action for short term immediate repairs as well as re carpeting the roads, wherever is required.</p>	<p>CEO(DP):-</p> <p>PWD Road:- The repairing work of road damaged due to rains has been carried out. The work-order of resurfacing and asphaltting work has been issued to agency & work has been started by the agency shortly.</p>
2	<p>Our members have reported that, they are facing severe problems in the transporting staff and material, due to very bad road conditions because of last heavy rains. Attached list would indicate details of the stretches, which needs war footing repairs. Federation believes that, Authorities would understand the seriousness of the problem and would do needful promptly</p>	<p>CEO(DP):-</p> <p>PWD Road:- The repairing work of road damaged due to rains has been carried out. The work order of resurfacing and asphaltting work has been issued to agency & work has been started by the agency shortly.</p> <p>As detailed below</p>
3	Roads	Remarks
1	Dadra check post to Demni road cannal	<p>Estimate submitted for re-ashphalting</p> <p>PWD Road:- The repairing work of road damaged due to rains has been carried out. The work order of resurfacing and asphaltting work has been issued to agency & work has been started by the agency shortly.</p>
2	Demni to KKalpena Industries India Ltd.	Estimate submitted for re-ashphalting
3	Dadra to Blue Star Ltd.	Estimate submitted for re-ashphalting
4	Woodland to Samarvarni	<p>PWD Road:- The asphalt patch work for the road stretch from Woodland Hotel to Samarvarni is in progress. The tender for the work of re-asphaltting of the said road has been awarded and the agency has started the work shortly.</p>
5	Binjani Industrial Estate internal roads	The work has started and is in progress
6	Athal Industrial Estate connecting Athal to Loparex India Ltd.	This road does not pertain to PWD-III, DP
7	Silli Riksha stnd to Rockwool Ind. Ltd.	The patch work will be done shortly.
8	Silli to Shubhlkshmi Polyester Ltd.	The patch work will be done shortly.
9	NITCO Ind. To Kuwapada	The patch work will be done shortly.
10	Surangi to DNH Spinners Pvt. Ltd./Mehratex India Ltd.	The patch work will be done shortly.

4	<p>Federation draws your kind attention towards pathetic condition of the road in Dadra, which is, connecting Dadra Check post to Demni Road alongside the canal. The road got badly damaged due to recent heavy rains. Movement of man and material is too heavy on this road because of the large number of industries situated in the area. There may be major accidents if road is not repaired on war footing.</p> <p>Similar damages have also occurred in other roads in UT because rains. Federation soon would submit a list of such roads so that industries in the UT may work at 'ease'. Hope industries would receive cooperation and support from both the authorities.</p>	<p>PWD Road:- The repairing work of road damaged due to rains has been carried out. The work order of resurfacing and asphaltting work has been issued to agency & work has been started by the agency shortly.</p> <p>CEO(DP):- No reply received.</p>
5	<p>Our members have reported that, they are facing severe problems in the transporting staff and material, due to very bad road conditions because of last heavy rains. Attached list would indicate details of the stretches, which needs war footing repairs. Federation believes that, Authorities would understand the seriousness of the problem and would do needful promptly</p>	<p>CEO(DP):- No reply received.</p> <p>PWD Road:- As detailed below</p>
6	Roads	Remarks
1	Dadra check post to Demni road cannal	Estimate submitted for re-ashphalting
2	Demni to KKalpena Industries India Ltd.	Estimate submitted for re-ashphalting
3	Dadra to Blue Star Ltd.	Estimate submitted for re-ashphalting
4	Woodland to Samarvarni	Pertain to SMC.
5	Binjani Industrial Estate internal roads	The work has started and is in progress
6	Athal Industrial Estate connecting Athial to Loparex India Ltd.	This road does not pertain to PWD-III, DP
7	Silli Riksha stnd to Rockwool Ind. Ltd.	The patch work will be done shortly.
8	Silli to Shubhlkshmi Polyester Ltd.	The patch work will be done shortly.
9	NITCO Ind. To Kuwapada	The patch work will be done shortly.
10	Surangi to DNH Spinners Pvt. Ltd./Mehratex India Ltd.	The patch work will be done shortly.
7	<p><u>Inserting condition on Surcharge in the agreement with Open Access Consumers:</u></p> <p>The Federation is thankful that DNH Administration has considered the request of consumers, who wish to go for power purchase on their own through open access method.</p> <p>This indicates the stand of Industries Associations, which was taken in past for quite long time that each industrial consumer must be given a freedom to purchase power</p>	<p>DNHPDCL:- DNHPDCL has implemented open access in the U.T. of Dadra and Nagar Haveli from FY-2015-16 in accordance with JERC for the State of Goa and Union Territories (Open Access in Transmission and Distribution) Regulations, 2009. The list of open access consumers and open access quantum as on 10.11.2016 is Annexed as ANNEXURE I. Details of various charges levied on the open access consumer is as annexed as ANNEXURE II.</p> <p>In this connection it is to submit that, presently the daily average demand of DNHPDCL is approximately, 724 MW. DNHPDCL does not have its own generating plants. The U.T. of DNH has allocated power from Central Sector Generating Stations of NTPC & NPCIL (NPC) of around 724 MW (firm</p>

from open market at most reasonable rates. This will bring down the cost of manufacturing, which is the national duty of all of us.

However, manufacturing cost has to decrease for all consumers and not just one segment that is open access consumers. And, also manufacturing cost of one should not be decreased at the cost of the other, in the present case of non open access consumers.

When this matter had been discussed with the Administration directly and also during the hearing of Annual Revenue Requirement for the 16-17 before Honourable JERC, Associations have been consistently pleading that due to open access by few consumers, other large number of non-open access consumers should not suffer directly or indirectly and therefore, DNHPDCL had proposed the additional surcharge on open access consumers to meet the loss to DNHPDCL on account of fixed charge and sale of surplus power by DNHPDCL. The power purchased by the DNHPDCL but not consumed by open access consumers, would become surplus with DNHPDCL and it in turn would have to sell it in the open market at much lesser rate.

Honourable JERC, in the tariff order, directed the DNHPDCL to prefer independent petition for such surcharge. It has been learnt that DNHPDCL has already preferred the petition to Honourable JERC. As per estimates made by DNHPDCL, this surcharge would be around Rs. 1.48 per unit.

In the interests of all consumers, it is

allocation - 82 MW, Specific allocation -123 MW and allocation from 15% unallocated portion of CS -518 MW). Besides this there is allocation of 38 MW from RGGPL. In order to meet power requirement of U.T. of DNHPDCL, medium term open access has been tied up with NSPCL - 100 MW and EMCO- 200 MW. As per the LTOA and MTOA contract signed with the aforesaid generating companies, it is obligated to pay Fixed Charges as per terms and conditions of tariff and the Power Purchase agreement (PPA). The variable charges are paid on the basis of actual energy scheduled.

Prior to granting of Open access in transmission and distribution in DNHPDCL, the entire demand of U.T. was met from Central Stations, Fixed Capacity Charges and variable energy charges were distributed and paid by all consumers as per the Tariff order by the Honourable JERC. In the present scenario Open access consumer has the liberty to draw power from either open access or from DNHPDCL as the contract demand of the open access consumer is not surrendered. As such in case of non-availability of power from open market or curtailment of power by NLDC/RLDC etc., the OA consumer at times has requested DNHPDCL to supply power. Hence, DNHPDCL has to keep a reserved capacity with the aforesaid generating companies for supplying to open access consumer as and when required and avoid deviation charges at volatile prices (Under Contingency arising from their suppliers or Transmission constraints in ISTS or non-clearance of bid in the power exchange or high and unaffordable prices). This reserve capacity is maintained by paying fixed charges to the generating stations even though energy is not scheduled. Also due to a large quota of unallocated demand from Central sector, in case of sustained under drawal or non-scheduling of power, the power allocated to DNHPDCL may be diverted to other power deficit states. This would affect the power adequacy and security of DNHPDCL.

In present open access regime, the capacity charges paid by DNHPDCL to various generators and recovered from various categories of consumers has a large gap. With granting of further open access, the gap is expected to widen.

An analysis of fixed charges payable by the consumers getting power supply from DNHPDCL and those who have obtained OA in

expedient that agreement should contain a specific condition to the effect, that NOC, to go for open access would be subject to the outcome of the petition filed before Honourable JERC by the DNH PDCL, and, in case Honourable JERC decides for additional surcharge, it would be payable from the date on which the consumer has gone for the open access.

We hope the Administration would impress upon the DNH PDCL to include this condition in the NOC being granted to Open Access consumers.

DNHPDCL has been done for Q3 (Oct-Nov-Dec) for FY 2015-16 is shown hereunder.

Above calculation shows a gap of Rs. 72.19 (83.29-11.10) Crores to be recovered from all the consumers for payment of fixed charges. Considering the scenario of pre-open access, the cost would be spread across spectrum of consumers as per tariff order of Honourable JERC.

However, after implementation of open access, DNHPDCL may recover the fixed cost in proportion to the energy consumption and is calculated as follows.

As per the current practice, amount (a) can be recovered as per tariff order. However, at present there is no regulatory provision available to recover amount from open access consumer. Under such scenario, the burden of difference will be transferred to Non Open Access Consumers while true up in subsequent years. Further, there is a lack of clarity in passing on the FPPCA charges to open access consumers, which would further burden the non-open access consumers of DNHPDCL.

This poses a risk of cross-subsidizing Open Access consumers at the cost of consumers to whom DNHPDCL has supplied power. In view of above, DNHPDCL has already proposed demand charged of Rs. 400 / KVA and Additional Surcharge of Rs. 1.48 per kWh in the MYT (Multi Year Tariff) petition for FY 2016-17, for which JERC in its order for FY 2016-17 approved fixed cost of Rs 275/KVA and directed DNHPDCL to file a separate petition for the recovery of additional surcharge towards the fixed cost of stranded capacity of power of DNHPDCL due to Open Access.

As per the Clause 16(iii) of JERC for the State of Goa and Union Territories (Open Access in Transmission and Distribution) Regulations, 2009, there is provision of levying of Additional Charges. A consumer availing OA and receiving supply of electricity from other person than the distribution licensee shall pay addition charges to meet fixed cost of the Licensee arising out of obligation to provide supply under sub section 4 of section 42 of EA. As per the provision of Clause 16 (iii) (a) (b) (c) of OA regulation, DNHPDCL has to put up details to the Commission the account of Fixed Charges paid by OA consumers and any part of fixed cost getting stranded etc. The

		<p>Commission shall accordingly scrutinize and determine the amount of additional charges. As per the regulation of CERC and JERC in respect of according Open Access to the consumers, the HT & EHT consumers of the UT Dadra & Nagar Haveli have Opt for Open access on Short Term basis. As on date 350 MW power has been drawn by the EHT & HT consumers of the territory through IEX on Short Term Basis.</p> <p>Now due to implication of Open Access the DNHPDCL is not in a position to schedule for full requirement of Power and liable to pay the fixed cost of the generator to the power generating units.</p> <p>The DNHPDCL has paid fixed cost(Capacity Charges) to the generator is about ` 2/ unit whereas the fixed cost portion being recovered from the HT & EHT consumer is ` 0.48/unit and rest proportion of the fixed cost is being recovered from the variable charges of the consumer in retail tariff issued by JERC.</p> <p>This ir-rationalization of the fixed cost recovery resulting into increase of FPPCA charges of the Non Open Access Consumers of the DNHPDCL.</p> <p>Looking to the above situation the DNHPDCL was filed a Petition before JERC for recovery of additional Surcharge for Open Access consumers of territory. On making several hearing and Public hearing at Silvassa and interacting with all the stake holders JERC has decided and issued additional surcharge to be levied from Open access consumers @ 47 paisa/unit. Copy of JERC order is also enclosed herewith.</p> <p>Against the order of JERC, the Association of Polyester Continuous Polymerization Industry of D&NH, Silvassa has filed an appeal before APTEL, New Delhi against which DNHPDCL has filed a reply. The hearing of the said appeal will be held on 17.11.2016.</p>
8	<p><u>Surrender of Power by DNHPDCL.</u></p> <p>Through this letter, we first record our sincere thanks for making industry friendly announcements on Independence day. Purpose of this letter to draw your attention and seek your intervention to another burning problem, which industry is facing today.</p> <p>Electricity bills for the month of July 16 have been received to the industries with a FPPCA of 67 paisa per unit. It is believed that the</p>	<p><u>DNHPDCL:-</u></p> <p>The drawal of the territory is 750 MW out of which 321MW is drawn by the consumer of DNHPDCL through Open Access directly IEX.</p> <p>They pay only fixed cost charges to the DNHPDCL for the contracted demand which</p>

FPPCA got increased due to open access allowed for 200 MW during the month of June 2016.

With this rate FPPCA for current quarter which will be reflecting in Oct-Dec quarter would be around Re1/- per unit. In a year, it would create a Burden of Rs 150 crore on non-open consumers (hereafter addressed as NOA) for the advantage of open access consumers (hereafter addressed as NOA). Since, increased FPPCA is paid only by the remaining Non-Open Access consumers; advantage of Open Access Consumers has become disadvantage of Non-Open Access Consumers. It is against the spirit of whole concept of open access. This is happening because of non-holistic power purchase management.

In past also Associations had drawn Administration's attention had suggested that to make open access fruitful; DNH PDCL must surrender 200 MW power on priority basis.

Sir, power generation industry has seen sea change in last three years. Scene of scarcity has changed to abundance availability. Competition has enhanced efficiency. Thus, we are not against the Open Access and have been suggesting to promote it. And, DNH PDCL will have to keep pace with fast changes, which are taking place in the power purchase business.

This Federation is wondering that in spite of letter referred above, DNH PDCL still have not taken required action for the reasons best known to them.

Sir, now time has come to act, otherwise we will vanish. If, at this stage, power of at least, 200 MW is not surrendered, not only surplus generated during last five years will evaporate but also put either energy rates to NOA consumers very high or spoil the financial health of DNH PDCL. Both the situations would be detrimental for the growth and development of UT, as moderate power tariff is now only attraction for the industries to be in the UT.

As per current data, DNH PDCL has contracts for 1300 MW power with its consumers, whereas actual consumption is 750 MW. It has agreements to buy power from various sources for 1050 MW. Availability out of these agreements is around 750 MW a day. Non-utilization of power due to open access is around 200 MW.

Federation suggests that DNH PDCL should immediately surrender 200 MW power. It will

are irrational and not in line with the fixed cost payable to the generators by DNHPDCL.

However, the Industries Association has pressing hard for surrender of about 200 MW power to overcome the situation of Open Access and reducing the fixed cost implication on the DNHPDCL and non-Open Access Consumers.

In view of this it is to mentioned that DNHPDCL maximum allocation of 724 MW from Central Sector generating station out of which firm allocation is only 82 MW and rest of allocation is from the un allocated quota of the generating stations being allotted by Ministry of Power to the all beneficiaries of Central Sectors following the Gadgil formula. The said power of Central Sector is mainly from NTPC stations and Nuclear Power Corporation of India Limited. If this power can be surrender it is very difficult to get revert back from the Government of India as it is allocated from unallocated quota only.

The DNHPDCL has made Long Term contract i.e. PPA with NSPCL Bhilai for 100MW, M/s. EMCO Energy Limited for 200 MW and M/s. RGPPL for 38 MW. The allocation of power from RGPPL is being done

bring about reduction in 'average purchase cost' which will benefit NOA consumers. It will also reduce burden of 'minimum fixed charge', which will benefit both the categories.

The apprehensions, which DNHPDCL have, are as under.

Power purchase arrangements were made with great difficulties and surrendering would mean utter disregards to those past sincere efforts?

OA consumers are not surrendering the power, and if they come back to DNHPDCL for power, how DNHPDCL would shoulder its contractual commitment to those consumers?

Many power purchase agreements do not have exit clause?

Who will bear the 'power surrender cost'?

Industries should bring direction from JERC?

Federation makes a humble effort in following few lines to address these issues:

1. Respect to past efforts:

Industries are grateful to Administration and DNHPDCL officials for their past sincere efforts to bring power allocation to the UT in difficult times. Sir, now situation has changed. Let past be our asset, not the burden. Industries will never forget the hard work of all those who had made life of industries easier by their hard and smart work.

2. Dealing situation of 'Return of OA Consumers back to DNHPDCL':

If that situation comes, DNHPDCL would again make efforts to purchase power from the available resources and if not available, it will make arrangements for judicious distribution of power available that time to all categories of power consumers. However, chances of coming back of OA consumers are very less. Even, hypothetically, it happens. We cannot spoil our present for an unknown future. We have to keep readiness for future problems and we have that readiness in the form of cooperation and coordination.

3. Legal bindings:

Federation is not aware of nitty-gritty of legal bindings of power purchase agreements. We have asked DNHPDCL for the copies of power purchase agreements vide our letter date 21.07.2016, but still copies have not been provided to us.

It well established principle of law, any contract which does not have exit clause is

by Ministry of Power to avail the Mega Power station to RGPPL.

The DNHPDCL has procure 200 MW power from M/s. EMCO Energy Limited by following Competitive bidding process as per the guidelines of Ministry of power and signed PPA for 7 years and 3 months since April 2013. Three years has already been completed and still 4years are remaining to complete the contract as per the terms and condition of PPA, if we desire to surrender the power at this juncture the fixed cost implication shall be payable for another three years by the DNHPDCL to the generator which also caused an extra burden to the DNHPDCL. The agreement sign by the NSCPL Bhilai is on long term basis for 25 years.

Also at present the consumers of the DNHPDCL are under gone Short Term Open Access only and procure power on day to day basis through IEX. They Opt for Open Access within the contract demand of their power with DNHPDCL. Partly they are using the power of DNHPDCL and partly they are procuring through Open access from IEX. Whenever they are not getting power from IEX they are utilizing the power of DNHPDCL any time. The prizes of exchange

<p>not a valid contract. In the absence exit clause, agreements are agreements of slavery which are against the constitution. Such agreements can be terminated by either party at any time without any cost. If agreements have exit clause, DNH PDCL must use them. It should take the Federation into confidence with openness.</p> <p>4. Cost of Surrender:</p> <p>We are into business. We know that breaking an agreement would bring a cost. Industries are ready to bear it. Its judicious and logical transfer to DNH PDCL and all categories of consumers would be a matter to be decided. We are willing to sit with DNH PDCL to understand and create a consensus.</p> <p>5. Need of JERC's direction:</p> <p>This is very unjustified excuse. JERC's approval of ARR is like a budget approval. Within the sanctioned budget, DNH PDCL has to operate. DNH PDCL is free to operate within the budget. It does not have to go to JERC for day-today management matters. Still, even, if, JERC's approval is mandatory, then, who is stopping DNH PDCL to seek it. When it wanted to increase power purchase, it had gone to JERC and taken the approval, then, how industry would take permission/direction for reduction. Still industry is not averse or shy of going to JERC to seek the direction. If required, it would be done...but that would be very unpleasant act of Federation where it would seek direction for DNH PDCL function.</p> <p>Sir, it is need of the hour that DNH PDCL has a holistic look at the situation, instead of a piecemeal approach. It is a question of survival for industries, question of growth and development for the UT and question of financial health for the DNH PDCL. All these questions are very important and have to be answered effectively and expeditiously. Federation is sure that Honourable Administrator would intervene in the matter and impress upon DNH PDCL to act like a good 'discom', get freedom from past hang over, refrain from imaginary future problems and take care of present.</p>	<p>are very uncertain and volatile which can increase at any time depend on power market scenario of the nation.</p> <p>If the DNHPDCL is surrender at this juncture to the tune of 200 to 250 MW and suddenly Open Access Consumers switch over the DNHPDCL, it is very difficult for DNHPDCL to handle the situation arise due to shortage of power. This issue is also to be consider while surrendering the power by the DNHPDCL.</p>
<p>9 Development Control Rules 2015 - Amendments.</p> <p>At outset, we express our sincere thanks and appreciations regarding your kind announcement on the occasion of Independence Day, increasing permissible</p>	<p>CO(SMC):- SMC follows the Development Control Rules that of DNHPDA. The contentions those have been incorporated by PDA under the Development Control Rules, are being adopted by SMC.</p>

	<p>percentage of ground coverage with the intention of growth and development of the UT and also enhance 'ease' to industries in making.</p> <p>Sir, we are overwhelmed with the announcement and also with the intention and spirit behind it.*</p> <p>However, we humbly bring to your notice that there are some anomalies which need to be corrected to protect the existing ground coverage in case of plot area is less than 10000 sq meter and even in case of plots of 10000 and above sq meter will also have not much ease and advantage for the reasons submitted in the subsequent paragraphs.</p>	
	<p>1. For the plots having area of less than 10000 sq meter, set backs from all three sides have been increased whereas, existing permissible ground coverage has not been increased. This will result in the reduction of permissible ground coverage area. In fact, industries will never be able to use 50% permissible ground coverage area because of huge increase that is around 150% in the set back. A small plot if has to provide such a huge set back from three sides, how; the plot will be left with 50% ground area. Thus, Federation suggests that set back area from three sides should be reduced and permissible ground coverage area should be enhanced.</p>	<p>DNHPDA:- The said representation was already discussed in the PDA Board Meeting held on 15th October, 2016 and as per a decision taken by constituted Committee that "this is not found feasible".</p>
	<p>2. The condition of abutting of the plot to 18 meters and above public road is impractical in the context of Dadra & Nagar Haveli. Roads width in the industrial area, permitted by the Town Planning department even were not 12 meters. Therefore, there will be hardly any beneficiary of your kind announcement. It is requested to reconsider to remove the condition of abutting the plot with 18 meters and above public roads.</p>	<p>The said representation was already discussed in the PDA Board Meeting held on 15th October, 2016 and as per a decision taken by constituted Committee that "this is not found feasible".</p>
	<p>3. It is suggested that departments preparing drafts for such amendments should consult stakeholders to understand their view point's make the rules and regulations more effective and more useful</p>	<p>The Administration may take a decision in this regard</p>
<p>10</p>	<p>Cap on Mortgage Registration Stamp Duty</p> <p>At outset, we express our sincere thanks and appreciations regarding your kind announcement on the occasion of Independence Day, reducing the stamp duty on registration of mortgage agreements from existing 1% to 0.25% to bring down in conjunction with prevailing corresponding rates in neighboring states.</p>	<p>Mamlatdar:- The proposal is being examined and will be submitted shortly.</p>

	<p>In this connection, we humbly bring to your notice that both the neighboring state has capping provision in the said duty. While state of Gujarat has a maximum ceiling of Rs.3 lakh and state of Maharashtra has ceiling of Rs. 5 lakh.</p> <p>Therefore, Federation requests Honourable Administrator to be kind enough to look into the matter again to save revenue of the UT from going to neighboring states and also to make 'ease' for industries and bankers by providing a cap of Rs. 3 lakh.</p>	
11	<p>Long Pending issues of Industries:- We take this opportunity to draw your attention to following four long pending issues which are causing tremendous problems to the industries: Notes of the issues raised vide letter dated 14.06.16</p>	
	<p>1. Rate of Stamp Duty</p> <p>Mortgage registration charge in our UT is 1% whereas in neighbouring states is 0.25 to 0.35%. We must reduce it. We must accept that mortgage is not transfer of property. Notification issued by of Maharashtra Government is attached. These notification establishes that mortgage duty is not only lesser than the UT, but also limited to maximum of Rs 3 Lakh only.</p>	<p>Mamlatdar:- The proposal is being examined and will be submitted shortly.</p>
	<p>2. Rates of Circles Rates</p> <p>Circle rates were affected last year without considering factors like accessibility, level of plot, and distance from main road. We must study the pragmatic practice of Gujarat where care is taken of all these factors.</p>	<p>Mamlatdar:- The factors as mentioned in the given representation were considered during the revision made in circle rates in 2010. However, since then no revision was med. Therefore, in 2015, on the basis of a clause in the order of 2010, a rise of 10% with cumulative effect for 5 years was made in the rates of 2010. It is thus proposed that revision of rates shall be considered w.r.t. factors mentioned in the representation.</p>
	<p>3. Need of Surrendering power by DNHPDCL</p> <p>The Federation and Associations are repeatedly requesting the Administration that country has entered into a cheaper power regime. We have to shift now our approach along with trends and currents of the power sector.</p> <p>There was a time, there was an acute power shortage, that time industries and Administration struggled shoulder to shoulder to get adequate power allocation to UT. Now, time has changed. Thanks to mega power plants and governmental policies,</p>	<p>DNHPDCL:- The drawal of the territory is 750 MW out of which 321MW is drawn by the consumer of DNHPDCL through Open Access directly IEX. They pay only fixed cost charges to the DNHPDCL for the contracted demand which are irrational and not in line with the fixed cost payable to the generators by DNHPDCL. However, the Industries Association has pressing hard for surrender of about 200 MW power to overcome the situation of Open Access and reducing the fixed cost implication on the DNHPDCL and non-Open Access Consumers.</p>

power is available at much cheaper rates. Hence, industries of the UT should also be allowed to use opportunity to consume cheaper power. This is possible only through open access. Hence, we do not oppose it. However, it has to be ensured that advantage of one set of *consumers (open access consumers) should not become disadvantage of others (non-open-access consumers).

The rightful and justified approach would be that DNH PDCL must surrender around 200 MW. DNH PDCL has two reservations:

a. If, the open access consumers for any reason come back to the grid, from where we will provide them power?

Sir, we as responsible Federation, submit that we will be willing at that point of time some suitable mechanism to share the shortage, including power staggering at purchase power at higher rates through open access route and there is mechanism available for additional surcharge called to FPPCA.

b. The cost of breaking the existing agreement would cripple DNH PDCL?

Sir, we all need to study the agreements and work-out the cost which will come on DNH PDCL. It is suggested that a committee be formed with the representatives from the industries to study and submit recommendation quickly.

If no action is taken Sir, the surplus accumulated over the period and which has made the power cheaper in the UT will be wiped out in no time. On the other hand, if power is surrendered, the average cost of power purchase is will go down considerable and everyone will be benefited.

In view of this it is to mentioned that DNHPDCL maximum allocation of 724 MW from Central Sector generating station out of which firm allocation is only 82 MW and rest of allocation is from the un allocated quota of the generating stations being allotted by Ministry of Power to the all beneficiaries of Central Sectors following the Gadgil formula. The said power of Central Sector is mainly from NTPC stations and Nuclear Power Corporation of India Limited. If this power can be surrender it is very difficult to get revert back from the Government of India as it is allocated from unallocated quota only.

The DNHPDCL has made Long Term contract i.e. PPA with NSPCL Bhilai for 100MW, M/s. EMCO Energy Limited for 200 MW and M/s. RGPPL for 38 MW. The allocation of power from RGPPL is being done by Ministry of Power to avail the Mega Power station to RGPPL.

The DNHPDCL has procure 200 MW power from M/s. EMCO Energy Limited by following Competitive bidding process as per the guidelines of Ministry of power and signed PPA for 7 years and 3 months since April 2013. Three years has already been completed and still 4years are remaining to complete the contract as per the terms and condition of PPA, if we desire to surrender the power at this juncture the fixed cost implication shall be payable for another three years by the DNHPDCL to the generator which also caused an extra burden to the DNHPDCL. The agreement sign by the NSCPL Bhilai is on long term basis for 25 years.

Also at present the consumers of the DNHPDCL are under gone Short Term Open Access only and procure power on day to day basis through IEX. They Opt for Open Access within the contract demand of their power with DNHPDCL. Partly they are using the power of DNHPDCL and partly they are procuring through Open access from IEX. Whenever they are not getting power from IEX they are utilizing the power of DNHPDCL any time. The prizes of exchange are very uncertain and volatile which can increase at any time depend on power market scenario of the nation.

If the DNHPDCL is surrender at this juncture to the tune of 200 to 250 MW and suddenly Open Access Consumers switch over the DNHPDCL, it is very difficult for DNHPDCL to handle the situation arise due to shortage

		of power. This issue is also to be consider while surrendering the power by the DNHPDCL.
	4. Rationalization of FSI FSI relaxation was granted in Feb 15 by the UT Administration, but it is not helping the industry. It motivates and facilitates the industry to go for vertical constructions. For the logistics expenses, industries do not go for vertical construction. There is a need to review it again and grant relaxations for ground floor constructions.	DNHPDA:- The Amendment in Clause 27 Table-11 for setback, Ground Coverage, FSI and Permissible building height for General Industrial Zone was Notified vide Notification No. DNHPDA/DCR/AMD/FSI/2014/1175 dated: 12/08/2016. CO(SMC):- SMC follows Development Control Rules of DNHPDA. Amendments effected time under Development Control Rules by PDA-is being followed by SMC.
2	Industries have potential to do. Though tax concessions regime for the territory is over. GST is on the verge coming into existence, and impacts of recession are there, still a lot can be done to boost business in the territory. 1. Ease in new investment / expansion	
a	Industry Promotion council should be reconstituted. Who will represent industries should be left to the industries. In the present council, Administration has placed members its own without any consultations to the Associations. Now, there is Federation, hence, fresh nominations should be obtained from the Federation.	GM(DIC):- The proposal of re-constitute of the Committee is put up on 08.11.2016 for approval of Honourable Administrator.
b	Present incentive schemes are not attractive in comparison of schemes prevailing in the neighbouring states, Maharashtra and Gujarat.	GM(DIC):- The UT Administrator will give priority for Ease of Doing Business instead of Subsidy incentives.
c	Capital investment subsidy should be increased to Rs. 15% for MSME and in case of textiles; it should be Rs. 20 % with the upper limit of Rs 50L.	GM(DIC):- The UT Administrator will give priority for Ease of Doing Business instead of Subsidy incentives.
d	Interest subsidy, which is, at present, @ 5% with an upper limit of Rs 30 L, should be increased to 7%, with upper limit of 1.5 crore and period should be enhanced to 7 years.	GM(DIC):- The UT Administrator will give priority for Ease of Doing Business instead of Subsidy incentives.
e	The technical textile interest subsidy, which is at present @ 6%, with upper limit of Rs. 50 L for a maximum period of 5 years, should be enhanced to 8%; with upper limit Rs 2 crore and maximum period should be enhanced to 7 years.	GM(DIC):- The UT Administrator will give priority for Ease of Doing Business instead of Subsidy incentives.
f	These incentives should be available for expansion of existing industries also, without the limit of 50%.	GM(DIC):- The UT Administrator will give priority for Ease of Doing Business instead of Subsidy incentives.

	<p>Period of benefits should be counted from the date of availing of the scheme.</p>	<p>GM(DIC):- The UT Administrator will give priority for Ease of Doing Business instead of Subsidy incentives.</p>
<p>13</p>	<p>1. Ease at Construction</p> <p>NA should be granted instantly. Filed need not be sent other departments except three, PDA, Revenue and LRO. It once granted should not require renewal. At present it is required at interval of every five years.</p>	<p>Mamlatdar:- The file is sent to PDA, Revenue, LRO, LAO and Soil Conservation. It is to state that file needs to be sent to (i) LAO to ascertain acquisition if any with regard to survey. No. in question and (ii) Earlier, the Department of Soil Conservation had given subsidies to certain land holders mortgaging their land and an entry of which is made in the RoR. Hence, file is sent to the Soil Conservation Department to ensure whether any recovery of such subsidies is to be made against the land bearing survey. No. in question.</p>
<p>b</p>	<p>Last year, Administration had fixed circle rates without considering factors like accessibility, level of plot, distance from main road. We must study the pragmatic practice of Gujarat where care is taken of all these factors.</p>	<p>Mamlatdar:- The factors as mentioned in the given representation were considered during the revision made in circle rates in 2010. However, since then no revision was med. Therefore, in 2015, on the basis of a clause in the order of 2010, a rise of 10% with cumulative effect for 5 years was made in the rates of 2010. It is thus proposed that revision of rates shall be considered w.r.t factors mentioned in the representation.</p>
<p>c</p>	<p>If the industry is willing to give undertaking that construction will be done as per prevailing DC Rules, construction be allowed immediate after the submission of application for construction permission.</p>	<p>DNHPDA:- This is a policy decision.</p>
<p>d</p>	<p>Fire NOC should not be insisted upon for CP.</p>	<p>DNHPDA:- At present provisional Fire NOC being obtained while granting Construction Permission.</p> <p>Fire & Emergency Ser.:- In fact the fire Department examine the proposed building plan along with relevant documents and issue specific fire safety recommendation for compliance on the basis of building structure and category of fire hazards as per relevant guideline/norms. Some of the life and fire safety measures such as width of staircase/exist, numbers of staircase/exit, occupant load, travel distance open spaces around the building, approach road, etc. are integrated of the building. Initially, it is necessary to examine the proposed building plan from the fire safety point of view. In case of any deficiency found in the proposed building plan at the initially stage, it can be rectified. However, it is not possible to rectify the same after completion</p>

		of the building. Therefore, the Provisional NOC must be obtained during the planning stage of the building.
	Checklist for CP in SMC area should be like PDA	PDA:- Reply not given by PDA. CO(SMC):- SMC follows Development Control Rules of DNHPDA. Mandatory documents requiring for the issuance of Construction Permission for the buildings within SMC's jurisdiction are identical as of PDA.
f	FSI relaxation was granted in Feb 15, but it is not helping the industry. It motivates and facilitates the industry to for vertical constructions. For the logistics expenses, industries do not go for vertical construction. There is a need to review it again and grant relaxations for ground floor constructions. It is suggested that for framing a proposal, a committee having representatives of the industries be formed. Federation nominates following to represent in the committee:	DNHPDA:- The Administration may take a decision in this regard.
g	Land record abstracts in the form 7/12 should be available online, and should be valid only for the day on which, it was downloaded. It will prevent chances of fraud and cheating.	Mamlatdar:- Digitally signed village form 7x12 and village form 8-A are being issued by the concerned Patel Talati and also from all the Saral Seva Kendrasin DNH. Date of generation is reflected on these village forms and DSC code so that the generated form could be verified online. The said forms are also available on 'AVANIKA' portal which is accessible publicly for information purpose only.
h	Validity of the certified map is 30 days. Industries feel it is redundant. There should not any validity limit, as no change occurs in the certified map.	Sur. & Sett. Office:- No validity limit for the certified map issued by the Survey Department has been specified unless there is a change in the ownership. The time limit of 30 days has been prescribed by the PDA. DNHPDA:- The Administration may take a decision in this regard.
i	Procedure for Fire NOC is undue stringent. These are simple copying the New Delhi practices, whereas, we should focus on practices in our neighbouring states. We are sure that following neighbouring state practices, we will not be compromising on safety issue. What we are asking is the procedural part.	
j	Construction permission should be granted online and interface between the department and industries be made online only to bring	DNHPDA:- Online Building Permission Approval Management System is already implemented

	transparency, and accountability.	by the Authority for granting construction permission
k	Certified maps of the Land Record department do not match to the maps of PDA and in the process sufferer id the industry. It is suggested that both department should undertake a time bound exercise to reconcile their maps	<p>Sur. & Sett. Office:- The Survey Department is maintaining the original maps of DNH, survey done in 1965. The maps of PDA are required to be prepared as per Survey record and in case the maps do not match, the PDA should consult Survey Department for its authentication.</p> <p>DNHPDA:- The Building Plan is being approved by the Authority on the Plan prepared as per the Certified map issued by the Survey & Settlement Department. There is no plan or map of PDA is available for matching the Certified Map. The existing Regional Plan and Outline Development Plan of PDA is being used to verify the land use zone and Road alignment.</p>
l	PDA has imposed penalty of very heavy amount on some industries for no fault / inaction on the part of industries. For some time PDA had stopped accepting applications for construction permissions and later on imposed penalty for that period. Such cases should be reviewed with the principle of equity.	<p>DNHPDA:- The penalties are being proposed is as per the Notified Development Control Rules 2014.</p>
m	If the industry is not in position to occupy full premises immediately, there should be provision of Part Occupancy	<p>DNHPDA:- Provision for Part Occupancy is already exists and granted</p>
14	<p>1. Ease at Energy Resource:</p> <p>Power is a main ingredient at manufacturing. Thanks to the initiatives of Administration that UT is now quite comfortable to provide power as per requirement of the Industry. Recent reduction in tariff has brought new hopes and opportunities. Sir, there is still huge surplus being generated by DNH PDCL. Federation hopes that with this huge surplus estimated in the Annual Revenue Requirement of DNH PDCL, there will be further reduction in tariff. However, still some issues are there:</p>	<p>DNHPDCL:- At present, there are two 220 KV Substation at Kharadpada and Khadoli substation with an installed capacity of 520 MVA and 480 MVA transformers respectively. There are 13 nos of 66/11 KV Substation at various places within the territory with an installed capacity of 712 MVA transformers.. The department has also planned for establishment of 2 x 220 KV Substation one at vaghchippa and another at Sayli with an installed capacity of 320 MVA and 200 MVA transformer respectively. The Associated transmission and Distribution lines will also be added up along with the projects.</p>
a	We must pay attention on infrastructure for future growth and development like timely change of distribution lines, erection of new sub-stations.	
b	Temporary power connections	
i	Time limit should be 7 days instead of present 15 days.	Time limit has been considered as per the JERC supply code Regulation 2010 i.e. within 3 days for loads up to 10 KW and within 15 days for load exceeding 10 KW. The copy of JERC Regulation attached herewith.(Copy enclosed, ANNEXURE VI)

	There should be no requirement of construction permissions.	It is as per the Swift guidelines as approved by the Administration. Subsequently the competent authority has asked to comply the same
	There should be no requirement of Registration as SSI or principle clearance as MSI /LSI	It is as per Swift guidelines as approved by the Administration
	Transformers to LT Consumers should be provided by the DNH PDCL.	As per the supply code Regulation of JERC the Distribution Transformer 11/0.4Kv shall be procured by the consumer/developer and above that the substation are being augmented or establish new substation by the licensee.(Copy attached, ANNEXURE IV).
	Permissions for change of CTPT and transformers require an undue long protocol. Authority in this respect should be delegated to Deputy Engineer.	The issue was discussed earlier also and as per the meeting conveyed by the Executive Engineer with the representatives of Industries Association. The streamline procedure has been decided. A copy of Minutes of Meeting is enclosed herewith.(Copy Attached ANNEXURE -III)
	SWIFT system should not insist the LT consumers to give undertaking that they will set up transformers and lines on their own expenses. In fact this kind of insistence is against the Supply Code of JERC.	It is as per Supply code Regulation, 2010. (Copy attached, ANNEXURE IV)
	Those who want to surrender the surplus power should deal strictly as per Supply Code prescribed by JERC and DNH PDCL should adopt a consumer friendly approach.	As per the tariff order issued by JERC 2016-17 the agreement period should be of two years for all LT and HT Consumers.(Copy attached, ANNEXURE V)
g	Surrender of power by consumers will enable DNH PDCL to surrender costlier power and thereby average power purchase will come down by 55 paise per unit. Our vision and suggested action plant for DNH PDCL was envisaged in detail in our presentation to JERC, during public hearing on ARR. DNH PDCL takes leaf out of those suggestion, it will be great ease in coming years.	Some of the consumers/Sick unit has surrendered their power capacity. However the peak demand of DNHPDCL is about 750 MW and the requirement of power is sufficient looking to the total power demand of DNHPDCL.
h	Feasibility report should be made available online. At present lot of unexplained things and delays are happening. DNH PDCL must define non feasible area and should display them on their website, which must be updated time to time.	The feasibility report is depend on the availability of power for concern 11 KV line related to 11/0.4 KV distribution transformer, their capacity and present loading condition. Therefore DNHPDCL has taken feasibility reports from the field area in charge before releasing the connection to the consumers. At present there is no any pending load for release in respect of feasibility of power.
15	1. Ease at PCC:	MS (PCC):-
a	Consents to establish and Operate in white and green categories should be made available within 7 days of making of the application.	The Consent to Establish and Consent to Operate under Cat-III industries are being issued within 30 days against the provision of 120 days as provided in the Act.
b	Consents to establish and Operate in orange category should be made available within 30 days of making of the application	The Consent to Establish and Consent to Operate under Cat-III industries are being issued within 60 days & 75 days respectively

		against the provision of 120 days as provided in the Act.
	Consent fees at present are on cost of project, whereas MSME basis is investment in plant and machineries. Same criteria should be followed for consent fees also.	The consent fees are being charged based on the total capital investment of the industries and the same criteria is being followed since 1999
	Documents should also be taken for consents online in soft form.	The PCC is in the process of developing Online Consent Monitoring and Management System with the help of NIC, New Delhi. The point raised for online submission of documents can be considered in line with the procedures being followed in other SPCBs/PCCs
	Matter related to GEPIL is disturbing the industries. An acceptable and reasonable solution should be arrived upon, otherwise, other parties who are willing to lift material from the UT be allowed, to make the operations of present facilitator as more efficient and competitive.	The matter regarding GEPIL being a commercial dispute between Industry Association and GEPIL should be sorted out by them, so far as lifting of waste by other TSDF, the same is considered after taking a policy decision.
f	In the recent classification of industries, some industries have been put on banned category. Existing units of those industries should be allowed expansion; otherwise they will become unviable over a period.	Regarding expansion of the existing banned industries, the matter is being examined separately and a policy decision shall be taken soon.
16	Ease at Finance and Taxation	<u>Mamlatdar:-</u>
a	Mortgage registration charge in our UT is 1% whereas in neighbouring states is 0.25 to 0.35%. We must reduce it. We must accept that mortgage is not transfer of property.	The proposal is being examined and will be submitted shortly.
b	VAT registration should be on line.	<u>VAT Dept.:-</u> The department has already implemented the online VAT registration from December-2011.
c	VAT schedule reviewed every year based on last three years historical data. VAT should be reduced where consistent trend of refund. It will reduce not only unnecessary workload of first collecting VAT and thereafter refunding back, but, will also get valuable working capital freed from idleness. It will reduce cost of manufacturing in the UT.	The proposal is under process.
d	Procedure for refund be made easy. Unnecessary protocols should be removed. Requirement of C form, as held by Bombay High Court, should be removed. There is no stay on judgment of Bombay High Court, hence, Administration must respect it letter and spirit.	<u>VAT Dept.:-</u> The VAT department has already issued circular ADM/AC/VAT/Compt/2009/2128 No. dated 29.12.2014 regarding grant of refund.
e	VAT on industrial inputs, which are used in manufacturing, should be made zero	The UT Administration of DNH has followed the Central Government Rules and Regulation from time to time.
f	Proposal should be made to extend CST exemption getting expired in the year 2017, till GST is made enforceable.	The implementation of GST is likely to be rolled out across the Country in Financial year 2017-18 and exemption related matter will be taken up with Ministry in due course.

OMA

6

<p>Ease in Working in Government Industrial Estates</p> <p>In OI DC Daman and Diu, plots given on lease were allowed to get converted in free hold. It is required as get the assistance from financial institutions, free hold plot is first condition.</p> <p>Such conversion should be allowed in industrial estates owned by the DIC in DNH also</p>	<p>GM(DIC):- The file was put up on July-2015 the matter is pending for want of discussion by GM (DIC) with Secretary (Industries).</p>
<p>Transfer of lease of these plots has been struck off for unknown reasons. This has become obstructive, in business flexibility.</p>	<p>The Power of Transfer of Plot has been delegated to Collector as per approval of the Honourable Administrator in the file No. DIC/15(18)/79-IEM, Plot Section, GIE-Masat dated 19.10.2016. All such pending file have been prepared and put up for approval of the Collector/Leaser through GM (DIC) on 19.09.2016.</p>
<p>Lease Transfer charges are very high. These should be revised down wards</p>	
<p>1. Ease in availability of Water:</p> <p>SIA, a constituent of this Federation had sponsored a detailed and exhaustive survey of water requirement for next thirty years in the UT. The report was presented by the Administration to the than Planning Commission which had sanction Rs 400 crore for the project. We request that actions to implement the project be speed up as water table is deepening to an alarm level in the UT.</p> <p>Drinking water from SMC's water treatment plant should be allowed to industries also.</p>	<p>CO(SMC):- The process of providing drinking water to the Industries is underway.</p> <p>CEO (DP):- No reply received.</p>
<p>19</p> <p>1. Ease in Approaching the UT and Traffic within the UT:</p> <p>a Roads in private industrial estates are in very bad shape. Government should maintain these roads.</p> <p>b Connectivity to Highway from Surangi via Sutrakar Road is need of the hour. We understand, Maharashtra Government has given its nod. Now, we should move fast. This will reduce traffic congestion in the town as trucks / containers meant for industrial units in up to Masat area from Khanvel, will not be required to come to Silvassa town.</p> <p>c Administration, in place of skywalks should focus on ring road and large fly over from Pipariya bridge to Samarwani to ease out current and future traffic congestions without affecting the growth and development of the UT.</p>	<p>Transport:- Matter does not pertain</p>

17 a	<p>Ease in Working in Government Industrial Estates</p> <p>In OI DC Daman and Diu, plots given on lease were allowed to get converted in free hold. It is required as get the assistance from financial institutions, free hold plot is first condition. Such conversion should be allowed in industrial estates owned by the DIC in DNH also</p>	<p>GM(DIC):- The file was put up on July-2015 the matter is pending for want of discussion by GM (DIC) with Secretary (Industries).</p>
b	<p>Transfer of lease of these plots has been struck off for unknown reasons. This has become obstructive, in business flexibility.</p>	<p>The Power of Transfer of Plot has been delegated to Collector as per approval of the Honourable Administrator in the file No. DIC/15(18)/79-IEM, Plot Section, GIE-Masat dated 19.10.2016. All such pending file have been prepared and put up for approval of the Collector/Leaser through GM (DIC) on 19.09.2016.</p>
c	<p>Lease Transfer charges are very high. These should be revised down wards</p>	
18	<p>1. Ease in availability of Water:</p> <p>SIA, a constituent of this Federation had sponsored a detailed and exhaustive survey of water requirement for next thirty years in the UT. The report was presented by the Administration to the than Planning Commission which had sanction Rs 400 crore for the project. We request that actions to implement the project be speed up as water table is deepening to an alarm level in the UT.</p> <p>Drinking water from SMC's water treatment plant should be allowed to industries also.</p>	<p>CO(SMC):- The process of providing drinking water to the Industries is underway.</p> <p>CEO (DP):- No reply received.</p>
19 a	<p>1. Ease in Approaching the UT and Traffic within the UT:</p> <p>Roads in private industrial estates are in very bad shape. Government should maintain these roads.</p>	<p>Transport:- Matter does not pertain</p>
b	<p>Connectivity to Highway from Surangi via Sutrakar Road is need of the hour. We understand, Maharashtra Government has given its nod. Now, we should move fast. This will reduce traffic congestion in the town as trucks / containers meant for industrial units in up to Masat area from Khanvel, will not be required to come to Silvassa town.</p>	
c	<p>Administration, in place of skywalks should focus on ring road and large fly over from Pipariya bridge to Samarwani to ease out current and future traffic congestions without affecting the growth and development of the UT.</p>	

20	<p>Ease in HR and Labour Matters a. Exit Policy for EOUs : Neighbouring state Gujarat has expanded the scope of chapter V D of the Industrial Disputes Act, 1947. The said chapter makes the exit policy easier by paying retrenchment compensation at enhance rate of 45 days for each completed year of service. This is a very reasonable and positive provision and therefore, UT Administration should move proposal to adopt Gujarat amendment of the ID Act for the UT also.</p>	<p><u>DSC(Labour):-</u> UT of DNH is a small territory without legislature. All Central Act/Rules are followed and implemented in the UT of DNH, Silvassa. Amendments to any of the provisions of Central Acts would require to be laid down before the Parliament.</p>
21	<p>a. Ease at Skill Availability: Industries do not get skilled manpower, whereas unemployed youth do not get the employment. To bridge this gap, we need to go skill development centres. Federation requests allotment of Gulmohar Rangshaala to Federation to establish skill development centre for local youths for making them employable in the trades and skills which are not imparted at ITI campus.</p>	<p><u>Principal (ITI):-</u> 1. Establishment of new ITI in Khanvel is under process. 10 acres land has also been allotted for the project. 2. Proposal for Establishment of World Class Skill Development Centre at Khanvel is under process. Re-e-tender for appointment of Transaction Advisor has to be floated. An additional land of 20 acres also identified at Khanvel. 3. Proposal for Establishment of Six Skill Development Centers in the UT is under process. 4. New 07 trade in ITI Silvassa. 5. ESDM Skill Development Centre in ITI, Silvassa. 6. Skill gap survey by NSDC. Further, it is also state that we make take help of Industries Association for Establishment of new ITI in Khanvel. We may also request Industries Association to suggest to start new trade and also seek there help to start these trades under Skill Development Scheme.</p>
22	<p><u>Accident Handling:</u> Accidents are not intentional, whereas gross negligence to safety precautions by anyone including employer and employee is unpardonable. Once accident in a factory happens, police start behaving with industry directors as if they are hardcore criminal. It is well settled law that every accident taking place in a factory as defined under the Factories Act, 1948 has to be tried under the Factories Act, 948 and not under the IPC. The Factories Act, 1948 is a self contained code and is a special law, while IPC is a general law. Special law always takes over general law. The approach factory Inspector is always based on punishment with corrections, as there was ill intention to harm someone. Approach of police to punish for criminal intention.</p>	<p><u>CIF&B:-</u> In the UT of DNH in general Police investigates the Industrial accident after taking the report/comments from Forensic Experts, Post Mortem report (in case of death), CIF&B, Explosive Department, Electricity department, Fire department etc. if needed, the prosecution sanction is obtained by the Police under the Factories Act-1948. Moreover all Industries do not fall under the preview of the Factories Act, 1948 and many accidents are outside the preview of the said Act. & <u>Police Department:-</u> Reply not received</p>

23	<p>Controversy over the Standing Orders:</p> <p>A model standing order was enforced in the year 2005 in the UT and applicability was reduced from 100 workmen to 20 workmen. The final notification clearly stated that it would be applicable to all establishments employing twenty or more workmen. But, subsequently, Administration gave in affidavit in Bombay High Court that they had intention to make new standing order applicable to establishments employing twenty or more but less than 100 as there is another model standing orders under the central rules for those establishment. This stand has created problems for the establishments who have taken disciplinary actions based upon new standing orders.</p> <p>This matter has to be deliberated to bring about applicability new standing orders for all industries. A new standing order is more progressive and more IR friendly. It was an outcome of 2nd Labour Law Commission's recommendations.</p>	<p>DSC(Labour):-</p> <p>There is no ambiguity between the DNH Industrial Employment Model Standing Orders, 2005. And the Industrial Employment (Standing Orders) Act, 1946 extended by the Central Government to the UT of DNH. The Model Standing Orders prescribed by the UT Administration under the proviso to sub-section (3) of Section 1 of the Industrial Employment (Standing Orders) act, 1946 is applicable to the Industrial Establishment which 20 or more workers are employed or were employed on any day of the preceding twelve months.</p> <p>The Central standing orders are applicable to the industrial establishments wherein 100 or more workmen are employed, or were employed on any day of the preceding twelve months under sub section 3 of section 1 of the Industrial Employment (Standing Orders) Act, 1946.</p>
24	<p>1. Ease in Fire and Emergency Services:</p>	<p>Fire & Emergency Ser.:-</p>
a	<p>Looking to the population and concentration of industries, we must establish Fire and Emergency service centres at Dadra, Naroli and Sayli as early as possible with adequate staff and equipments.</p>	<p>A proposal for setting up of two Fire Stations one each at Dadra & Naroli is under consideration with the Ministry since long time.</p>
b	<p>An NOC is required to be obtained from Fire development every year by the industries. Unit which were constructed 20-25 years ago were as per the building and development rules prevailing at that time. National Building Code Standards were not applicable and prevailing at that time. Such units are being asked to comply NBC. This is not only unfair and impractical but also not in accordance with law.</p>	<p>Fire & Emergency Ser.:-</p> <p>At present the renewal of Fire NOC is require to obtain from the Fire department every two year. Further, if any old industries units insist the renewal of fire NOC, they must be installed inbuilt fire fighting system as per relevant norms except some life safety measures.</p>
c	<p>Industries that require to store solvents need an NOC from Collector's Office under Explosive legislations. Though fire department has given NOC, Collector's Office now wants Fire department to certify that there will not be any fire incident in next one year it is ironical. Who can take the guarantee of not happening any incidence. Fire department can give NOC based on precautionary measures. Therefore, inter department matter should not become obstacle in the functioning of the industries</p>	<p>Fire & Emergency Ser.:-</p> <p>Not pertains to this department.</p>

25	<p>Ease at Law and Orders a. Extortion Industries are prone to extortion by various vested elements. Other large states have special police stations for extortion related complaints. UT Police should also create a special wing to deal the matters.</p>	<p><u>Police Department:-</u> Reply not received</p>
	<p>b. Humiliation in the name of police Investigations</p> <p>There are occasions that false and motivated complaints are filed against the industries. Police should handle such complaints with more dignity and sensitivity. Federation is not against the investigation. But Federation is extremely averse to humiliation in the name of investigations.</p>	
26	<p>Ease at Working in Private Industrial Estates</p> <p>Inner roads of private industrial estates are in very bad shape. The matter has been discussed many times. Daan Patras in some of the sates was arranged also. But in some estates, Danpatras are not possible.</p> <p>It is suggested that government should acquire the existing inner roads 'as it is' in public interests and maintain them so that industries existing in those industrial estates may get some relief.</p>	<p><u>Mamlatdar:-</u></p> <p>Files were moved for acquiring industrial roads as govt. roads. Notices were issued, hearings were conducted and Dan Patrak in favour of Govt. was also invited so that the Govt. can maintain these roads of these 33 industrial estates have been mutated in the name of "Shri Sarkar". However, in few cases objection was received for which hearing was also conducted and cases are being decided as per law.</p>
27	<p>Participatory Approach Administration should appoint departmental Consultative committee with nominations from the Federation to understand the views of industries at initial stage rather at curative stage.</p>	<p><u>GM(DIC):-</u></p> <p>The proposal has been put up for re-constitution of the committee.</p>