



Regd. No. MH323/2012

Agro Inputs Manufacturers Association (of India)

To,
The Commissioner,
Dept. of Agriculture,
Central Building, Pune.



Date: - 16/10/2018

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लिपिक 16/10/18
आयुक्त कृषि कक्ष
कृषि आयुक्तालय, म. रा
पुणे - १

Kind Attention: – Shri Sachindra Pratap Singh

Subject – Recent instances of sampling and filing of FIR on manufacturers of Non Registered Plant Growth Promoters with respect to adulteration of chemical fertilizers scheduled in FCO 1985.

Respected Sir,

We welcome the recent drive conducted by the Quality Control Department to analyse the contents of Non Registered PGPs. Our association has always supported that farmers should always get the right product. As an association we strongly believe that any kind of adulteration in agri input should not be tolerated. We would like to bring to your kind attention that it is very important to scientifically study and analyse the findings with respect to reports of the samples and correlate them with the provisions of FCO 1985. The same must have been done at the department level but the chemical knowledge may not be adequate and the findings can be misinterpreted. This may result in filing of unnecessary legal cases on manufacturers as a result there is lot of mental harassment, loss of business and also keep farmers away from using a genuine product.

Owing to above issues, we request you to form a scientific committee to study and give opinion about such cases which involve a non registered product. The committee may contain QC officials, Scientists from university, Manufactures, Legal Experts and farmers. If needed our association will be very happy to involve in this process and render our co-operation as we did in past during the sale permission process in the year 2010.

We would also like to draw your kind attention to the recent FIRs being lodged on some manufactures under section 420. Most of our members or the manufactures on whom the recent FIRs were lodge posses all the licences offered by agriculture department to manufacture fertilizers / Insecticide / selected organic manures etc. There is no such arrangement or guideline available from the government for obtaining the licence to manufacture non registered products. The honourable High Court has recently passed an order that sale of such products can not be stopped unless government brings them in to a legal framework. Hence such actions are out of jurisdiction and there is no need file legal cases and file FIRs. We hereby request you not to take such harsh steps of legal action and filing FIRs by misusing the powers of QC Inspectors and provisions under FCO and the EC Acts when non registered products are not in the preview of above acts.

We once again request you to kindly think about formation of a committee to access and analyse reports of non registered products before filing FIRs and legal cases against the manufactures.

We will be highly obliged if you can please grant us your appointment to express our association's stand and to have discussion with you in this regards.

Thanking you,

Mr. Rajkumar Dhurgude Patil
President

Agro Inputs Manufacturers Association

Mr. Sameer Pathare
Secretary