



Regd. No. MH323/2012

Agro Inputs Manufacturers Association (of India)

Date - 14/12/2018

To,
The Commissioner
Department of Agriculture
Central Building,
Pune- 411001

Subject - Proposal to issue SALE PERMISSION for NON REGISTERED PRODUCTS in the state of MAHARASHTRA.

Reference - Agro Input Manufacturers Association's (AIM) active participation from 2010 to 2017 in G.R. Committee constituted by the Government of Maharashtra for issuing sale permission for Non Registered products vide GR no CPS 2010/P.K.222/17A dated 16 August 2010

Respected Sir,

We are the registered association (F-40352,Pune)of small to medium scale manufacturers engaged in manufacture of products used in agriculture. Our presence is in many states of India. We work for welfare, technical support and guidance of our members.

Most of the products manufactured by our members are mainly based on natural substances, nutrients ,herbal extracts and are not included in schedules of either THE INSECTICIDE ACT 1968 or THE FERTILIZER CONTROL ORDER 1985 .The said products are generally being termed as THE NON REGISTERED PRODUCTS .

AIM was formed in 2010 to address the grievances of manufacturers of non registered products and since it's inception, worked as active member of the GR Committee as an INVITEE. AIM had requested the representation on GR Committee to the then Commissioner of Agriculture Mr.Prabhakar Deshmukh who instantly accepted the request. AIM then took part in all the GR Committee meetings conducted (as many as 13) and due to its active participation was also included in GR Committee's SUB COMMITTEE for finalization of proposals of manufactures by scrutinizing the presentation of selected manufacturers.

During this long period, by simultaneously working with the government body, AIM also started conducting the MULTI LOCATIONAL EFFICACY FIELD TRIALS of the products shortlisted by the GR COMMITTEE on 26.04.2011.The trials were conducted in four AGRICULTURE UNIVERSITIES of Maharashtra. The permission to conduct trials on POOL DATA basis was obtained from the then Commissioner of Agriculture Mr. Umakant Dangat .

(The list and permission letter is enclosed for your ready reference)

AIM ASSOCIATION, PUNE

Outward No.:

Inward No.: 1669

Dated: 17-12-2018

Office Address : Chhatrapati Shivaji Market Yard, Shop No.6, 1st Floor. Madhyavarti Bhavan, Gultekdi, Pune- 411037

Ph-020-24274482 Email- info@aimassociationindia.com. Website-www.aimassociationindia.com

Till today AIM has almost completed the efficacy field trials of 15 products as cited above for three years which are multi locational and have covered variety of crops such as vegetables, cotton etc.

(The reports are enclosed herewith for your reference)

In 2017 , AIM also conducted and successfully completed TOXICOLOGICAL TRIALS of 10 of the 15 common products (excluding chelates) from a recognized GLP laboratory from Pune. The 6 pack analysis of these products is ready and the products are already certified as 100% non toxic.

(The reports are enclosed herewith for your reference)

We would like to bring to your kind attention that the products shortlisted by the GR Committee are standardized by defining minimum percentage of active ingredient. Hence there will be uniformity in terms of manufacturing. The lable claim for all the products will be identical. AIM has already chemically analysed all the products and method of analysis are defined. This will also ensure the QUALITY CONTROL of these products. The methods of analysis were handed over to the GR committee earlier but we are enclosing them once again .

(The analysis reports and analysis methods are enclosed herewith for your reference)

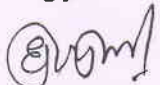
Taking in to consideration all above points, we hereby propose to your good self to kindly give this matter much needed forward thrust to formulate ways to start procedure of issuing sale permission to non registered products.

Our proposal is as follows -

1. Issue sale permission to manufacturers who will provide efficacy POOL DATA as certified by AIM.
2. Issue sale permission to manufacturers who will provide individual efficacy trial data of minimum one year from Agriculture University.
3. AIM will provide Lable draft of COMMON PRODUCTS of which pool data is available. Dosage will be based on best possible dosage as per results obtained from efficacy trials.
4. Individual or special product Lable claim will be respective manufacturers responsibility.
5. AIM will provide analysis methods for common products. For special products, respective manufacturer will provide the analysis methods.
6. Sampling and testing procedures will be same as FCO but sample failure should be based on fine in rupees.
7. The sale permission will be renewed after every 3 years.
8. Every manufacturer will produce an affidavit on Rs-100/- stamp paper regards to assurance of quality of their products and of compensation to farmers if there is any damage to his crop due to usage of their product if proved guilty by the Consumer Court.

We hope that you will consider our proposal and invite us to finalize the same with government office bearers with their suggestions and inputs.

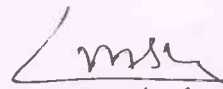
Thanking you.



Mr. Rajkumar Dhurgude Patil
President

Yours sincerely,




Vice president - AIM Pune
Mr. Sameer Pathare
Secretary



AGRO INPUTS MANUFACTURERS (AIM) ASSOCIATION OF INDIA

AN ASSOCIATION FOR THE DEVELOPMENT OF AGRO INPUTS MANUFACTURERS

Index

Efficacy Toxicological study conducted by Indian Institute of Toxicology, Pune

Sr.	Products	Study No.
1.	Humic Acid(6%) Liquid	19205 to 19210
2.	Humic Acid (50%) Powder	19211 to 19216
3.	Humic Acid (1.5%) Granules	19217 to 19222
4.	Protein Hydrolysate(20%)Liquid	19223 to 19228
5.	Protein Hydrolysate(1.5%)	19229 to 19234
6.	Protein Hydrolysate(50%)Powder	19235 to 19240
7.	Potassium Salt Of Mono Silicate(10%)Liquid	19241 to 19246
8.	Potassium Monosilicate(50%) Powder	19247 to 19252
9.	Seaweed Extract(1%) Liquid	19253 to 19258
10.	Seaweed Extract(0.1%) Granules	19259 to 19264