

CHAMBER OF SMALL INDUSTRY ASSOCIATIONS

Member, National Board for MSMEs [2010-2012]

ESTD.YEAR 1990

REGD.NO.11-67185

Silver Jubilee Year

COSIA/031/07/14/041

25th July 2014

Shri G.A. Raghuvanshi,
Under Secretary
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Ground Floor,
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Namaskar,

Subject:- Suggestions on Amendment in the Labour Laws (Exemption from Furnishing Returns and Maintaining Registers by Certain Establishments) Act, 1988 – regarding.

The Chamber of Small Industry Associations [COSIA], a National Chamber of MSMEs, would like to offer following suggestions on above subject.

- 1. Very small establishment:-** We suggest that any establishment having workers upto 20 should be termed as very small establishment.
- 2. Small establishment:-** We suggest that an establishment having more than 20 workers and upto 50 workers should be termed as small establishment.
- 3. Maintaining registers by small:-** At present a small establishment is to maintain three registers. It has been proposed that it will maintain only two registers. We suggest that they should be allowed to maintain only muster cum wage register.
- 4. Calculation of number of workers:-** In most of the Micro and Small Enterprises the turnover of labour is rampant. While calculating the number of workers in order to decide whether an establishment is very small or small, persons employed in the preceding period of 12 months are always calculated for no solid reason. We suggest that the number should be as on date. The necessary amendment in the definition be made.

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5. **E-furnishing of return:-** It is said that a return can be furnished through electronic mail if the authority has the facility to receive such electronic mail. Such provisions seem to be very funny. To our knowledge email facility is available in all labour offices and therefore, the wording, "if the authority has the facility to receive such electronic mail," be deleted.
6. **Schedule:-** In the schedule we suggest that all the labour laws of Govt. of India should be specified instead of only 19 Labour Laws.

I hereby request you kindly to consider above suggestions aptly.

A line in reply will be appreciated.

Thanking you,

With regards,



Dilip Salvekar,

Secretary General