



MADHYANCHAL COTTON GINNERS & TRADERS ASSOCIATION

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Date: - 19th April, 2024

To,
Shree J. K. Gupta
Scientist-E & Head (Textiles)
Textiles Department
Bureau of Indian Standards
9 Bahadur Shah Zafar Marg
New Delhi

Subject: Suggestions regarding BIS & QCO in Cotton and request for Membership of TXD 31.

Respected Sir,

Greetings from Madhyanchal Cotton Ginners & Traders Association from Madhya-Pradesh !

We, The Madhyanchal Cotton Ginners & Traders Association {MCGTA}, represents a significant segment of the cotton textile industry in Madhya-Pradesh the Heart & Central Province of India. We are the very important stakeholders in cotton production and consumption in the state of Madhya-Pradesh. Our association comprises Ginners, Traders, Exporters and Brokers of Cotton. We have the true voice of our 250+ Cotton Industrialists in central zone of India. We play very important role in dispute redressal, collaborations and communications in the cotton industry.

We would like to congratulate you for introducing the Cotton Bales “**Quality Control Order**” in the trade of the concerned commodity. It will be a milestone as per our view in the history of the Cotton sector. The **BIS standard 12171:2019** along with its amendments, referenced in the Quality Control Order is highly adaptive and its implementation will immensely benefit the trade and produce instant benefit to the cotton value chain as well as tactical figures, Which has been needed from long time. However, with due respect we would like to suggest you some points that we believe should be added in IS 12171:2019.

Introduction of Rd and +b fibre quality parameters in the standard along with relevant tolerances. The inclusion of these colour parameters, which impact pricing along with other quality attributes, will further ease trading in the commodity.

With regard to the **Indian Standards Act, 2016 (11 of 2016)**, we would like to suggest the following for your kind perusal:

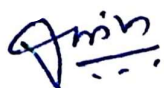
Point number 29 related to Penalty for Contravention may be amended. We suggest that instead of a jail term, a gradual system of dissuading monetary penalties ultimately leading to the cancellation of licenses, along with forbiddance of carrying out trade in the commodity, may be introduced, considering cotton bales as a natural product.

Now a days each & every buyer yarn mills has their own facility of laboratories and most of the time results worries in mill to mill testing systems. So we request NABL accreditation must be applicable in each & every laboratories having cotton testing facility with penalty system.

We further request that keeping in view the number and scope of stakeholders associated with us, our organization **Madhyanchal Cotton Ginners and Traders Association [MCGTA]** must be included as a **Member** of “**TXD 31-Man-made Fibres, Cotton and their Products Sectional Committee**”, so that we can contribute to cotton standardization and help in the progress of the country with keeping in mind the common interests.

We are deeply grateful for your cooperation in giving us our opinions and suggestions. We hope that you will seriously consider our suggestions and respond positively. We are eager to work with you for the bright future of the cotton industry related sector of the great civilization of India. Thank you

Madhyanchal Cotton Ginners & Traders Association

A handwritten signature in blue ink, appearing to read 'Vinod', with a horizontal line underneath and a few small dots below that.

Vinod Kumar Jain

{President}

Email**Textiles BIS****Request****From :** pradeepjain1911@yahoo.com

Wed, Apr 17, 2024 04:32 PM

Subject : Request**To :** Textiles BIS <txd@bis.gov.in>, textiles bis
<textiles.bis@gmail.com>**Cc :** kkcottex@gmail.com, vallabh ind
<vallabh.ind@rediffmail.com>**Reply To :** pradeepjain1911@yahoo.com

From:
Khandesh Ginning and Pressing Factory Owners Association
(Regd) 17/04/2024
10, Shivaji Nagar,
Jalgaon. 425001 MS
Mob. 9823046495

Dear Sir

Greetings from Khandesh Gin Press Association Jalgaon Maharashtra. We are representing more than 200 members. We have 150 ginning factories in our region. With production of 25 lakh bales per year.

At the onset we would like to congratulate for introduction of Cotton Bales (Quality Control) Order in the trade of the commodity. The BIS standard 12171: 2019, with its amendments, referred in the Quality control order is very adaptive and by implementation the trade will be benefited immensely. Further we would like to bring to kind notice that following points may also be addressed in the IS12171:2019.

1. Introduction of Rd and +b fibre quality parameters in the standard along with relevant tolerances. Of late color parameters mentioned above impacts the pricing along with other quality attributes. Therefore, inclusion of these parameters in the standard will further ease the trading in the commodity.

Regarding Indian Standards Act, 2016 (11 of 2016) we would like to state following for your kind perusal.

1. The point number 29 related to Penalty for Contravention may be amended. It is suggested that in place of jail term a gradual system of dissuading monetary penalties ultimately leading to cancellation of license along with forbiddance of carrying out trade in the commodity may be introduced considering cotton bales being a natural product.

Thanking you,

Yours,

(Pradeep Jain) President,
Khandesh Ginning and Pressing Factory Owners Association(Regd) Jalgaon.
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visit us:www.khandeshginpress.com
