

Shri Utpal Kumar Singh,
Hon'ble Joint Secretary,
Department of Agriculture & Co-operation,
Government of India.

Subject: Request for meeting in regard to sale of household insecticide.

Hon'ble Joint Secretary,

Greetings from Retailers Association of India (RAI),

Retailers Association of India (RAI), is the premier-most body representing modern retailers across the country. Our membership base includes over 900 retail organization which comprise of over 298000 store outlets. RAI has constantly strived for conducive regulation and legislation that promotes the interests of consumers by allowing modern retail to grow and flourish. It is in this interest that we write to you today to express some of the issues faced by our members engaged in the sale of household insecticides.

As you would be aware, the subject of import, manufacture, sale, transport, distribution and use of insecticides is regulated by the Insecticides Act, 1968. The noble aim of the act is to ensure that risk arising from misuse of insecticides towards human and animal life is mitigated by regulation. We agree that considering the harmful or potentially harmful effects of insecticides it is important that some of them be tightly regulated to prevent any harm.

However, we would like to submit to you that considering the overbearing nature of this regulation, it poses certain impediments to the retail industry which we believe can be addressed **without increasing the risk exposure**. Most retail outlets are engaged in the sale of "household insecticides" which pose considerably less risk to life as compared to other industrial or commercial insecticides which indeed need to be regulated more strictly. We recommend you to reconsider rule 9 (4B) of new amendment in insecticide rules 1971.

Rule 9 (4B) of new amendment in insecticide rules 1971

A person who applies for the grant of license to sell, stock or exhibit for sale or distribute insecticides shall possess or shall employ a person possessing a graduate degree in Agricultural Sciences or in Science with Chemistry or Botany or Zoology as the minimum qualification: Provided that all retailers or dealers possessing a valid license as on the date of notification of this sub-rule shall be allowed a period of two years to comply with the educational qualifications.

RAI views and recommendation

1. Household insecticides are great means to fight disease, and this clause will prohibit their free sale and use.
2. The new compliance requirement of a mandatory science degree qualification will adversely impact the business of retailers and pose a threat to

RAI National Council

B A Kodandarama Setty,
Vivek Ltd.

B S Nagesh,
Shoppers Stop Ltd.

Kishore Biyani,
Future Group

Noel Tata,
Trent Ltd.

Shashwat Goenka,
Spencer's Retail

Vinay Nadkarni,
Globus Stores Pvt. Ltd.

Atul Chand,
ITC - LRBD

Bhaskar Bhat,
Titan Industries Ltd.

Bijou Kurien,
L Capital Asia

Kabir Lumba,
Lifestyle International (P) Ltd.

Govind Shrikhande,
Shoppers Stop Ltd.

Jamshed Daboo,
Trent Hypermarket Ltd.

Pinakiranj Mishra,
Ernst & Young Pvt. Ltd.

Rafique Malik,
Metro Shoes Ltd.

Rakesh Biyani,
Future Group

Rahul Mehta,
CMAI

Shubhranshu Pani,
Jones Lang LaSalle

J Suresh,
Arvind Brands

Kumar Rajagopalan,
RAI

entrepreneurship. The government should consider removing this strict licensing rules for household insecticides.

3. Household insecticides are very different compared to other commercial and industrial insecticides and are not as harmful to humans unless used incorrectly and do not pose the same health threats.
4. Retailer's trade only in **pre-packed** household insecticides, holding of a science degree is not really necessary
5. Retail workforce primarily comprises of local 10th and 12th standard pass-outs who have very limited employability in any other sector. Most of retail entrepreneurs are not graduates and they engage in retail trade to earn their livelihood. Further they cannot afford to employ a science graduate person as required by new amendment.
6. The new amendment is a major threat to modern retail and small kirana shops and not in line with government's objective of ease of doing business and will create a lot of grey areas and lead to exploitation due inspector raj

In summary, we submit that there needs to be a classification of insecticides on the basis of risk posed and selling of household insecticide should not be subject to rule 9 (4 B). The government needs to consider relooking if this requirement is necessary. This will help retailers to satisfy consumer needs and sell 'safe for use house use insecticides' such as mosquito coils, insect killers etc. The removal of this requirement will also allow the authorities to focus on more harmful insecticides that pose a much greater risk.

We hope that you shall receive our representation positively and would appreciate if you could grant us a meeting so that an industry delegation may meet you and benefit from your expert opinion.

We would be obliged, if we would seek your intervention in this matter.

Looking forward to a positive response.

Warm Regards,

For and on behalf of Retail Association of India



Gautam Jain
Director - Advocacy

RAI National Council

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