

August 8, 2014

The Cane Commissioner,
Uttar Pradesh,
Lai Bahadur Shastri Ganna Kisan Sansthan,
Bahumanzila Bhawan,
New Berry Road
LUCKNOW-226001



SS/F002/6.2/RO
**SIMBHAOLI
SUGARS**

Simbhaoli Sugars Limited

Regd. Office :
Simbhaoli - 245 207, Distt. Hapur U.P. (INDIA)
Tel : (05731) 223117, 223118, 223023
Fax : (05731) 223039, 223262
E-mail : info@simbhaolisugars.com
www.simbhaolisugars.com

Subject: Notice Suspending Cane Crushing Operations In 2014-15 Sugar Season
w.e.f. 08.2014

Dear Sir,

With lot of anguish and despair, we have to inform you that our financial condition has deteriorated so much that it has become extremely difficult to continue our operations under the current circumstances and for the reasons beyond our control. There is an urgent need to rationalize the cane pricing policy in U.P. and adopt the 'linkage formula' recommended by Rangarajan Committee.

On our behalf, our Association, UPSMA, has written to the State Government on 08.07.2014 and 04.08.2014, including through various other letters and representations submitted from time to time, highlighting the present predicament of the sugar mills, which are in brief as follows. Copy of the said letter dated 4.8.2014 is enclosed for your ready reference giving details:

1. It is to be appreciated that in the present scenario of unknown and unbridled cane price and where it is unclear as to when a long-term sustainable cane price pricing policy, based on the 'linkage formula', is adopted in the State, we are unable to make any commitment for purchase of cane in the ensuing season or submit our requirement for the same. We have already requested the concerned authorities to allow us to submit our estimates of cane requirement vide our association letters dated 21.7.2014 and 25.7.2014 also; but the request made in our said letters has not been accepted.
2. Facing a similar problem before start of 2013-14 sugar season, we had submitted that the State Advised Price (SAP) of Rs.280/- per quintal of cane was much beyond our paying capacity, and that there would be substantial cane price arrears, if the State insisted on the high SAP of Rs.280/- per qtl. Our apprehensions have come true and we are struggling to clear the cane price arrears of the current season. We do not want a repeat of this situation again next year (2014-15).
3. While making us start the crushing operations in 2013-14, the State Government gave the following assurances and commitments:-
 - a) Committee under Chief Secretary would recommend for a rationalized cane pricing policy from next sugar season. The Committee was set up in Jan. 2014, and was to give its recommendations in 3 months.
 - b (i) If the financial condition of sugar industry so requires, State Government would give financial assistance, including subsidy of Rs.9/- per quintal of cane. A Committee was set up in Jan. 2014, and was to give its recommendations in 3 months. But no said subsidy has been given.
 - b (ii) benefit of Rs. 11/- per qtl. of cane was extended to the mills by the State Govt.
 - c) No coercive action would be taken against mills.

Specialty Sugars

Polable Alcohol

Ethanol

Power

(AN ISO 9001 : 14001 & FSSAI 22000 CERTIFIED COMPANY)
Sales Tax : RP-5000042 Centre : 12-B-57, UPTA No. 8081827, Distt. 12-B-57
Delhi Office : E-1329, 3rd Floor, Harsha Bhawan, Media Circle
Cooperative Place, New Delhi - 110001
Tel : 011-43214100, 43214101 Fax : 011-433417587
TIN No. : 09489200002





SS/F002/6.2/R0

**SIMBHAOLI
SUGARS****Simbhaoli Sugars Limited**

Regd. Office:

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Tel: (05731) 223117, 223118, 223223

Fax: (05731) 223039, 223262

E-mail: info@simbhaolisugars.com

www.simbhaolisugars.com

4. Relying upon the assurances and commitments given by the State Government, we had started crushing operations for 2013-14, with a clear hope and understanding that if need be, the State Government would come forward with financial help. Instead of getting the assured and committed financial assistance from the State, we are being subjected to all sorts of persecutions, including FIRs against most of the promoters, directors and senior officers of the sugar mills.
5. The Banks have become quite apprehensive due to seizure and forced auction of sugar stocks of several companies, ignoring the first charge of banks. They also want clarity and transparency on the cane pricing policy to take further exposures on U.P. sugar mills.
6. The State Government, accepting the losses incurred by cooperative sugar mills of the State, provides financial help to them every year to meet their cane price liabilities. For the season 2013-14 too, the Government of U.P. has provided Rs. 400/- crore grant to enable them meet their cane price arrears. This works out to around Rs. 55/- to Rs. 60/- per quintal. No such financial help has ever been provided to the private sugar mills, despite operating in the same State, under similar circumstances. This discrimination against the private sugar mills is unacceptable to us any longer.
7. The two major sugar producing States, i.e. Maharashtra and Karnataka, who together contribute for almost 50% of the country's sugar production, have already adopted and implemented the 'linkage formula' as recommended by the Rangarajan Committee for determining the cane price automatically at 70% of revenue realized from sugar and first stage by-products or 76% of revenue realized from sugar alone. It is understood that a team of senior officials from U.P. had visited Maharashtra and Karnataka to study their cane pricing system and have since submitted their report to the Government. Therefore, the State Government should be able to quickly finalise the formula for U.P. too.
8. UPSMA has submitted several representations to the State Government, apprising them about the factual financial position of the sugar mills, requesting financial help so that the mills could tide over the severe crisis. However, no response has been received to our submissions so far.
9. The Rangarajan Committee after consulting all stakeholders had recommended for adoption of the revenue sharing model of cane pricing, as is being followed all over the world, between the farmers and the millers in a fair and equitable manner. The Central Government had also referred these recommendations to the State Governments, including to the U.P. Government, suggesting for adoption and implementation of the formula. It is common knowledge that the Central Govt. has already declared the fair and remunerative price (FRP) @ Rs.220/- per quintal linked to 9.5% recovery of sugar for the season 2014-15 vide order dated 14.2.2014.

Specialty Sugars

Potable Alcohol

Ethanol

Power

(AN ISO 9001:2000 & FSSC 22000 CERTIFIED COMPANY)

Sales Tax: NF-5000049 Central 12-3-57, UPTI No. 09018/27 Dates 12-3-57

Delhi Office: E13/29, 3rd Floor, Harsha Shiksha Middle Circle,

Connaught Place, New Delhi - 110001

Tel: 011-43214100/43214101 Fax: 011-23147497

TIN No. 05209200002





SS/F002/6.2/R0
**SIMBHAOLI
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Regd. Office :

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10. It must be appreciated that the genesis of the problem is high and excessive cane price fixation by the State Government, combined with the low sugar realizations. It is pertinent to point out that even the Central Government in its recent Affidavit filed before the Hon'ble High Court has also observed thus: *"That the problem of cane price arrears arises when realization by sugar mills from sale of sugar is not enough to pay the cane prices to the farmers. Surplus production over domestic consumption in the last three sugar seasons and low exports due to subdued international sugar prices have led to building up of sugar stocks with the mills. This has adversely affected the financial health of the mills and led to cane price arrears. Though the Government fixes Fair & Remunerative Price of sugarcane on the recommendations of CACP, fixation of higher cane price by some of the States compounds the problem"*.

11. It is also to be appreciated that there is an atmosphere of fear and lack of confidence in the system. The promoters and officers are being branded as criminals. The business environment in U.P. of is vitiated and the industry is unsure not only about the business per se but also the environment in the State. We cannot continue to run our mills in losses. We also expect that we should also earn reasonable and fair profits from the sugar manufacturing business.

It has been emphasized time and again that the sugar Industry in Uttar Pradesh is financially distressed and ailing. The promoters, as also the banks and financial institutions do not see any future in the State to continue in the business. We had repeatedly requested and pleaded for a long-term solution to the vexed problem of cane pricing year after year leading to huge losses, lengthy litigations and cane price arrears of farmers. It is to be appreciated business is not sustainable under such circumstances. We are willing to commence cane crushing operations in the coming season 2014-15 on the basis of FRP and sharing of further revenue and cane price as per Rangarajan Committee recommendations and Rs.9 per quintal of financial assistance be given for current sugar season and coercive action be stopped to allow the Management and Staff to work in congenial and peaceful atmosphere. It is expected that a rational cane pricing formula similar to the 'linkage formula' and as adopted in Maharashtra, is adopted in the State of U.P. as well, to give a fair deal to the farmers as well as to the sugar mills.

Under the present circumstances and with no long term transparent, logical and economically viable mechanism or formula to determine cane price, we are constrained to serve "Notice of suspension of cane crushing operations" in 2014-15 sugar season, and are forced to discontinue repair and maintenance of our plant and machinery and accordingly forced to withdraw concerned workers and staff from the factory. We are also informing the concerned authorities about the suspension of works.

Specialty Sugars

Potable Alcohol

Ethanol

Power

AN ISO 9001 : 14001 & FSSAI 22000 CERTIFIED COMPANY
Sales Tax - HP-50100-13 Central 12-3-57, UPTI No. 0601827 Date 12-3-57
Distt. Office - E13/35, 3rd Floor, Naraina Bhawan, Middle Circle
Connaught Place, New Delhi - 110001
Tel: 011-43214100, 43214101 Fax: 011-23417537
TIN No. 0942320002





SS/F002/6.2/R0
**SIMBHAOLI
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Simbhaoli Sugars Limited

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www.simbhaolisugars.co.in

Sir, we would like to submit that being conscious of commitment towards cane farmers and in the over-all public interest, it would be prudent that, as submitted above, an amicable long term solution is worked out at the earliest to save this ailing industry of the State.

Thanking You

Your faithfully,

For Simbhaoli Sugars Ltd, Simbhaoli


Chief General Manager

Encls:- UPSMA Letter dated -04.06.2014

UPSMA Letter dated -25.07.2014

UPSMA Letter dated -21.07.2014

UPSMA Letter dated -08.07.2014

Secretary GOI's Letter dated -30.06.2014

CC: The Chief Secretary, Govt. of U.P.

The Principal Secretary (Cane Dev. & Sugar Industry) U.P.

District Magistrate- Hapur

Dy. Cane Commissioner Meerut

District Cane Officer- Hapur

Chairman/Secretary, Co-operative Cane Dev. Union Ltd, Simbhaoli, Hapur, Siyana,

Mawana, Mohiuddinpur, Baurala, Mallyana, Bulandshahr, Meerut, Bahanpur &

Modinagar

CERTIFIED TRUE COPY

For SIMBHAOLI SUGARS LIMITED


Kamal Samtan
Company Secretary

Specialty Sugars

Potable Alcohol

Ethanol

Power

(AN ISO 9001:2001 & FSSC 22000 CERTIFIED COMPANY)
Sales Tax: HP-500049 Central 12-3-57, UPTI No. 0001027 Dated 12-3-57
Main Office: F-1329, 3rd Floor, Naraina Bhowan, Middle Circle,
Connaught Place, New Delhi-110001
Tel: 011-23314100, 43211101 Fax: 011-23317557
TIN No. 0948200002

August 8, 2014

The Cane Commissioner,
Uttar Pradesh,
Lal Bahadur Shastri Ganna Kisan Sansthan,
Bahumnanzila Bhawan,
New Berry Road
LUCKNOW-226001



CIN-L24231UP1936PLC000740

**SIMBHAOLI
SUGARS**

Simbhaoli Sugars Limited

(An FSSC 22000 : 2011, ISO 9001 : 2008
& 14001 : 2004 Certified Company)

Corporate Office :

C-11, Connaught Place, New Delhi - 110001 India

Tel. : +91-11-41510421-23 Fax : +91-11-23413088

E-mail : info@simbhaolisugars.com

www.simbhaolisugars.com

**Subject: Notice Suspending Cane Crushing Operations in 2014-15 Sugar Season
w.e.f. 08.2014**

Dear Sir,

With lot of anguish and despair, we have to inform you that our financial condition has deteriorated so much that it has become extremely difficult to continue our operations under the current circumstances and for the reasons beyond our control. There is an urgent need to rationalize the cane pricing policy in U.P. and adopt the 'linkage formula' recommended by Rangarajan Committee.

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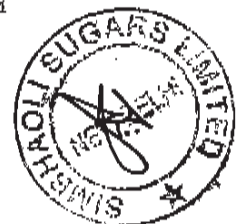
Specialty Sugars

Potable Alcohol

Ethanol

Power

Head Office: Simbhaoli, Bahumnanzila Bhawan, New Berry Road, Lucknow-226001





CIN-L24231UP1936PLC000740

SIMBHAOLI SUGARS

Simbhaoli Sugars Limited

(An FSSAI 22000 : 2011, ISO 9001 : 2008
& 14001 : 2004 Certified Company)

Corporate Office :

C-11, Connaught Place, New Delhi - 110001 India
Tel. : +91-11-41510421-23 Fax : +91-11-23413089
E-mail : info@simbhaolisugars.com

4. Relying upon the assurances and commitments given by the State Government, we had started crushing operations for 2013-14, with a clear hope and understanding that if need be, the State Government would come forward with financial help. Instead of getting the assured and committed financial assistance from the State, we are being subjected to all sorts of persecutions, including FIRs against most of the promoters, directors and senior officers of the sugar mills.
5. The Banks have become quite apprehensive due to seizure and forced auction of sugar stocks of several companies, ignoring the first charge of banks. They also want clarity and transparency on the cane pricing policy to take further exposures on U.P. sugar mills.
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Specialty Sugars

Food Grade Alcohol

Ethanol

Power

REG. OFFICE: SIMBHAOLI, JALPAIGURI DIST. PIN-725207



CIN-L24231UP1936PLC000740

**SIMBHAOLI
SUGARS**

Simbhaoli Sugars Limited

(An FSSC 22000 : 2011, ISO 9001 : 2008

& 14001 : 2004 Certified Company)

Corporate Office :

G-11, Connaught Place, New Delhi - 110001 India

Tel. : +91-11-11510423-23 Fax: +91-11-23413038

E-mail : info@simbhaolisugars.com

www.simbhaolisugars.com

10. It must be appreciated that the genesis of the problem is high and excessive cane price fixation by the State Government, combined with the low sugar realizations; It is pertinent to point out that even the Central Government in its recent Affidavit filed before the Hon'ble High Court has also observed thus *"That the problem of cane price arrears arises when realization by sugar mills from sale of sugar is not enough to pay the cane prices to the farmers. Surplus production over domestic consumption in the last three sugar seasons and low exports due to subdued international sugar prices have led to building up of sugar stocks with the mills. This has adversely affected the financial health of the mills and led to cane price arrears. Though the Government fixes Fair & Remunerative Price of sugarcane on the recommendations of CACP, fixation of higher cane price by some of the States compounds the problem"*.

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It has been emphasized time and again that the sugar industry in Uttar Pradesh is financially distressed and ailing. The promoters, as also the banks and financial institutions do not see any future in the State to continue in the business. We had repeatedly requested and pleaded for a long-term solution to the vexed problem of cane pricing year after year leading to huge losses, lengthy litigations and cane price arrears of farmers. It is to be appreciated business is not sustainable under such circumstances. We are willing to commence cane crushing operations in the coming season 2014-15 on the basis of FRP and sharing of further revenue and cane price as per Rangarajan Committee recommendations and Rs.8 per quintal of financial assistance be given for current sugar season and coercive action be stopped to allow the Management and Staff to work in congenial and peaceful atmosphere. It is expected that a rational cane pricing formula similar to the 'linkage formula' and as adopted in Maharashtra, is adopted in the State of U.P. as well, to give a fair deal to the farmers as well as to the sugar mills.

Under the present circumstances and with no long term transparent, logical and economically viable mechanism or formula to determine cane price, we are constrained to serve "Notice of suspension of cane crushing operations" in 2014-15 sugar season, and are forced to discontinue repair and maintenance of our plant and machinery and accordingly forced to withdraw concerned workers and staff from the factory. We are also informing the concerned authorities about the suspension of works.

Specialty Sugars

Potable Alcohol

Ethanol

Power

Reg. Office: SIMBHAOLI, UNNAO, U.P. PIN CODE - 225001





CIN-L24231UP1936PLC000740

SIMBHAOLI SUGARS

Simbhaoli Sugars Limited

(An FSSC 22000 : 2011, ISO 9001 : 2008
& 14001 : 2004 Certified Company)

Corporate Office :

C-11, Connaught Place, New Delhi-110001 India.

Tel. : +91-11-41510421-23 Fax : +91-11-23413088

E-mail : info@simbhaolisugars.com

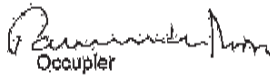
www.simbhaolisugars.com

Sir, we would like to submit that being conscious of commitment towards cane farmers and in the over-all public interest, it would be prudent that, as submitted above, an amicable long term solution is worked out at the earliest to save this ailing industry of the State.

Thanking You,

Your faithfully,

For-Simbhaoli Sugars Ltd, Unit Brijnathpur


Occupier

Encls:- UPSMA Letter dated -04.08.2014
UPSMA Letter dated -25.07.2014
UPSMA Letter dated -21.07.2014
UPSMA Letter dated -08.07.2014
Secretary GOI's Letter dated -30.06.2014

CERTIFIED TRUE COPY

For SIMBHAOLI SUGARS LIMITED


Kamal Samtani
Director

CC: The Chief Secretary, Govt. of U.P.
The Principal Secretary (Cane Dev. & Sugar Industry) U.P.
District Magistrate- Hapur
Dy. Cane Commissioner Meerut
District Cane Officer- Hapur
Chairman/Secretary, Co-operative Cane Dev. Union Ltd. Hapur, Dhulana, Siyana,
Mohluddinpur, Bulandshahr, Bhagpat & Modinagar

Specialty Sugars

Potable Alcohol

Ethanol

Power

RETURN TO: SIMBHAOLI SUGARS LTD, Brijnathpur, 201001



SIMBHAOLI SUGARS LTD.

Unit - Chilwaria

14th Km. Bahraich - Gonda Road, P.O. Chilwaria - 271891 Dist. Bahraich (U.P.)
Tel : 05252 - 244251-52, Fax : 244253-54



Date : 08.08.2014

The Cane Commissioner,
Uttar Pradesh,
LUCKNOW

Subject: Notice suspending cane crushing operations in 2014-15 sugar season
w.e.f. 08.2014

Dear Sir,

With lot of anguish and despair, we have to inform you that our financial condition has deteriorated so much that it has become extremely difficult to continue our operations under the current circumstances and for the reasons beyond our control. There is an urgent need to rationalize the cane pricing policy in U.P. and adopt the 'linkage formula' recommended by Rangarajan Committee.

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Range Office :
Simbhaoli-245207
Dist-Ghaziabad (U.P.)
Tel : (05731) 223117-18-19
Fax : (05731) 223039

Sales Tax Regn. No.
G.S.T. No. : HP-5000048 Dated 12.08.57
UPTT No. 0001827 Dated 12-9-57
Tm No. : 09480200002

Corporate Office :
C-11, Connaught Place,
New Delhi-110001 India
Tel : 91-11-41510421-23
Fax : 91-11-23413086





SIMBHAOLI SUGARS LTD.

Unit - Chilwarla

14th Km. Bahraich - Gonda Road, P.O. Chilwarla - 271801 Dist. Bahraich (U.P.)
Tel : 05252 - 244251-52, Fax : 244253-54



2

2. Facing a similar problem before start of 2013-14 sugar season, we had submitted that the State Advised Price (SAP) of Rs.280/- per quintal of cane was much beyond our paying capacity, and that there would be substantial cane price arrears; if the State insisted on the high SAP of Rs.280/- per qtl. Our apprehensions have come true and we are struggling to clear the cane price arrears of the current season. We do not want a repeat of this situation again next year (2014-15).
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Head Office :
Simbhaoli-245207
Distt-Ghazipur (U.P.)
Tel. : (05731) 223117-18-19
Fax : (05731) 223033

Sales Tax Regn. No.
C.S.T. No. : HP-5000949 Dated 12.08.57
UPPT No. 6301827 Dated 12-8-57
Tin No. : 09158200002

Corporate Office :
C-11, Connaught Place,
New Delhi-110001 India
Tel. : 91-11-41510421-23
Fax : 91-11-22413088





SIMBHAOLI SUGARS LTD.

Unit - Chilharia

14th Km. Bahraich - Gonda Road, P.O. Chilharia - 271801 Dist. Bahraich (U.P.)
Tel.: 05252 - 244251-52, Fax: 244253-54



5. The Banks have become quite apprehensive due to seizure and forced auction of sugar stocks of several companies, ignoring the first charge of banks. They also want clarity and transparency on the cane pricing policy to take further exposures on U.P. sugar mills.
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Regd Office:
Simbhaoli-245207
Dist. Bahraich (U.P.)
Tel.: 1 (05251) 223117-18-19
Fax: 2 (05251) 223039

Sales Tax Regn. No.
C.S.T. No.: RP-5000049 Dated 12.08.57
VAT No. 0001827 Dated 12-8-57
Tin No.: 0948920002

Corporate Office:
Q-11, Connaught Place,
New Delhi-110001 India
Tel.: 91-11-43510421-23
Fax: 91-11-22413088





SIMBHAOLI SUGARS LTD.

Unit - Chilwarla

14th Km. Bahraich, Gonda Road, P.O. Chilwarla - 271801 Distt. Bahraich (U.P.)
Tel : 05252 - 244251-52, Fax : 244253-54



9. The Rangarajan Committee after consulting all stakeholders had recommended for adoption of the revenue sharing model of cane pricing, as is being followed all over the world, between the farmers and the millers in a fair and equitable manner. The Central Government had also referred these recommendations to the State Governments, including to the U.P. Government, suggesting for adoption and implementation of the formula. It is common knowledge that the Central Govt. has already declared the fair and remunerative price (FRP) @ Rs.220/- per quintal linked to 9.5% recovery of sugar for the season 2014-15 vide order dated 14.2.2014.
10. It must be appreciated that the genesis of the problem is high and excessive cane price fixation by the State Government, combined with the low sugar realizations. It is pertinent to point out that even the Central Government in its recent Affidavit filed before the Hon'ble High Court has also observed thus *"That the problem of cane price arrears arises when realization by sugar mills from sale of sugar is not enough to pay the cane prices to the farmers. Surplus production over domestic consumption in the last three sugar seasons and low exports due to subdued international sugar prices have led to building up of sugar stocks with the mills. This has adversely affected the financial health of the mills and led to cane price arrears. Though the Government fixes Fair & Remunerative Price of sugarcane on the recommendations of CACP, fixation of higher cane price by some of the States compounds the problem"*.
11. It is also to be appreciated that there is an atmosphere of fear and lack of confidence in the system. The promoters and officers are being branded as criminals. The business environment in U.P. of is vitiated and the industry of unsure not only about the business per se but also the environment in the State.

Regional Office:
Simbhaoli-245207
Distt-Ghazabad (U.P.)
Tel : (05791) 223117-18-19
Fax : (05791) 223039

Sales Tax Regt. No.
C.S.T. No.: HP-5000049 Dated 12.08.57
UFTF No. 0001827 Dated 12-8-57
Tin No.: 09489200002

Corporate Office:
C-11, Connaught Place,
New Delhi-110001, India
Tel.: 91-11-41510421-23
Fax: 81-11-23413088





SIMBHAOLI SUGARS LTD.

Unit - Chitwaria

14th Km. Bahraich - Gonda Road, P.O. Chitwaria - 271801, Distt. Bahraich (U.P.)
Tel.: 05262 - 244251-52, Fax: 244253-54



:- 5 :-

We cannot continue to run our mills in losses. We also expect that we should also earn reasonable and fair profits from the sugar manufacturing business.

It has been emphasized time and again that the sugar industry in Uttar Pradesh is financially distressed and ailing. The promoters, as also the banks and financial institutions do not see any future in the State to continue in the business. We had repeatedly requested and pleaded for a long-term solution to the vexed problem of cane pricing year after year leading to huge losses, lengthy litigations and cane price arrears of farmers. It is to be appreciated business is not sustainable under such circumstances. We are willing to commence cane crushing operations in the coming season 2014-15 on the basis of FRP and sharing of further revenue and cane price as per Rangarajan Committee recommendations and Rs.9 per quintal of financial assistance be given for current sugar season and coercive action be stopped to allow the Management and Staff to work in congenial and peaceful atmosphere. It is expected that a rational cane pricing formula similar to the 'linkage formula' and as adopted in Maharashtra, is adopted in the State of U.P. as well, to give a fair deal to the farmers as well as to the sugar mills.

Under the present circumstances and with no long term transparent, logical and economically viable mechanism or formula to determine cane price, we are constrained to serve "Notice of suspension of cane crushing operations" in 2014-15 sugar season, and are forced to discontinue repair and maintenance of our plant and machinery and accordingly forced to withdraw concerned workers and staff from the factory. We are also informing the concerned authorities about the suspension of works.

Regd Office :
Simbhaoli-245207
Distt-Ghazipur (U.P.)
Tel. : (05731) 223177-18-19
Fax : (05731) 222039

Sales Tax Regn. No.
G.S.T. No. : HP-5000049 Dated 12.06.57
UPIT No. 0001827 Dated 12-6-57
Tin No. : 0948920002

Corporate Office :
A-11, Connaught Place,
New Delhi-110001 India
Tel. : 91-11-41510421-20
Fax : 91-11-23413086





SIMBHAOLI SUGARS LTD.

Unit - Chilwaria

14th Km. Bahraich - Gonda Road, P.O. Chilwaria - 271801 Distt. Bahraich (U.P.)
Tel : 05252 - 244251-52, Fax : 244253-54.



2 6 00

Sir, we would like to submit that being conscious of commitment towards cane farmers and in the over-all public interest, it would be prudent that, as submitted above, an amicable long term solution is worked out at the earliest to save this ailing industry of the State.

Thanking You,
Yours faithfully
For SIMBHAOLI SUGARS LTD.
UNIT- CHILWARIA

Authorised Signatory

Enclosure: 1) UPSMA Letter dt. 04.08.2014.

2) UPSMA Letter dt. 25.07.2014.

3) UPSMA Letter dt. 21.07.2014.

4) UPSMA Letter dt. 08.07.2014.

5) Secretary, Government of India letter dt. 30.06.2014.

- CC: 1. The Chief Secretary, Govt. of U.P.
2. The Principal Secretary, Govt. of U.P.
3. District Magistrate, Bahraich (U.P.)
4. District Cane Officer, Bahraich (U.P.)
5. Chairman/ Secretary of Co-operative Cane Society Bahraich/ Nanpara.

CERTIFIED TRUE COPY

For SIMBHAOLI SUGARS LIMITED

[Signature]
Secretary

Regd Office:
Simbhaoli-246207
Distt-Ghazipur (U.P.)
Tel.: (05731) 223117-18-19
Fax : (05731) 223033

Sales Tax Regn. No.
C.S.T. No.: HP-5000048 Dated 12.08.57
U.P.T.T. No. 0001829 Dated 12-8-57
Tin No.: 0949920002

Corporate Office:
C-11, Connaught Place,
New Delhi-110001 India
Tel.: 81-11-41570421-29
Fax : 81-11-23413028

upsma

u p sugar mills association

Ref.No. 187 / 09 / 2014

August 4th, 2014

The Chief Secretary,
Government of Uttar Pradesh,
Lal Bahadur Shastri Bhawan,
LUCKNOW.

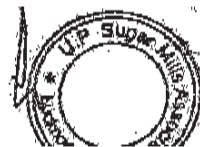
Subject: Notice suspending cane crushing operations in 2014-15 sugar season

Dear Sir,

1. We wish to invite your kind attention to our letter dated 08.07.2014 and the correspondences we had with your goodself and other concerned authorities. We had most humbly submitted that the Sugar Industry is financially distressed and ailing and do not see any future in the State to afford to continue business in the present scenario of cane price. We had repeatedly requested and pleaded for some long term solutions to the recurring problem of Cane pricing year after year leading to losses and recurring litigations. It would be appreciated that no business can be **sustained for long in losses and in** such circumstances.

We were quite hopeful that the Government shall fulfill its commitments with regard to subsidy of Rs.9/- per quintal of cane, finalise the policy for cane price and sugar price linkage formula as per recommendations of Rangrajan Committee as also advised by the Government of India and further help and **subsidy** shall be considered. However, nothing tangible has happened so far. The two high powered Committees constituted by the Government have not **submitted their reports so far**, whereas their recommendations were to be finalised within 3 months of their formation.

We had submitted at the time of the start of the crushing season 2013-14 that at **State Advised Price (SAP)** of Rs.280/- per quintal there would be cane price arrears of about Rs.10,000/- Crores at the end of the season. Further there were Cane price arrears of about Rs.2400/- Crores pertaining to previous season



2012-13 at the time of start of season 2013-14. Obviously, the same had to be paid by the sugar mills out of the generation of funds from the current season production. The apprehensions of the sugar mills about the cane price arrears of 2013-14 season became true. It would also be appreciated that the genesis of the problem is high and excessive cane price fixation by the State Government combined with the low sugar realizations.

You are fully aware that the sugar mills of U.P have been suffering huge losses during the last 4 years, which is given below for your kind information:

Sugar year	Losses (Rs. crore)
2010-2011	1750
2011-2012	1960
2012-2013	3200
2013-2014	3500 (Estimated)

As a result of this 21 sugar mills have either been closed down or have gone sick and are before BIFR. Around 8 sugar mills have almost wiped out their net worth and all others are facing severe cash crunch since there is hardly funding support available to them from banks and financial institutions because the repayments are not visible. **The credit rating agencies have already severally downgraded the credit rating of U.P based sugar mills.** In these circumstances, Sir, no business or industry can survive and run.

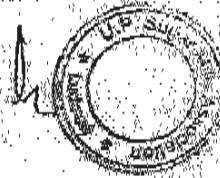
- Admittedly, the sugar mills of U.P have been suffering these losses due to unreasonably high cane prices (SAP) declared by the State Govt., which have been fixed arbitrarily and without considering either the revenue realization of mills or their paying capacity. SAP has not been based on any transparent, logical or laid down economic principles and relevant factors. There has not been any consideration to ensure a fair or reasonable return from the huge capital employed in the sugar business by the sugar industry. The State Govt. has not even been considering the actual manufacturing cost of sugar incurred by the sugar mills, in a tangible and transparent manner while fixing the cane price. No provisions have been made for the sugar mills to get a fair and reasonable return or profit.



3. On the other hand, the **Fair and Remunerative price (FRP)** determined by the Central Government already ensures a fair, remunerative and reasonable return to the farmers over and above their cost of producing sugarcane, and at the same time attempts to provide for some return to the sugar mills too. Despite determination of a fair and remunerative price by the Central Govt. since 2009, the State Govt. of U.P. continued to fix a higher SAP, arbitrarily and unreasonably, without considering the paying capacity of the sugar mills and the sugar price. This has caused huge losses and contributed to the financial crisis that the sugar mills of U.P. are in today. It cannot be denied that the power of fixing the cane price should not be exercised in a manner which continuously causes losses to the sugar mills, is prejudicial to their interests or does not provide for a reasonable, fair margin to the sugar mills, which is admittedly apparent from their adverse financial results of the preceding years. Such fixation of SAP has also been against the objects and the spirit of the provisions of the UP Sugarcane (Regulation of Supply and Purchase) Act, 1953.

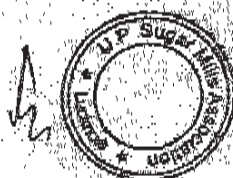
4. Having left with no option and due to unsustainable financial condition and immense pressure from the bankers and other stakeholders, the sugar mills were forced to serve a 'suspension of operations notice' in the month of November, 2013. It was then submitted before the State Govt. that the mills are unable to operate under "unbridled, unviable, unaffordable and unreasonable cane prices well beyond the paying capacity of the mills and that continuous losses cannot be sustained any further". The sugar mills were not in a position to sustain the losses or to arrange further funds to start the mills in the sugar year 2013-14. However, the sugar mills were compelled, pressurized and lured by the State Govt. to start the crushing operations, with assurances and commitments that the interests of the sugar mills would be fully protected in equitable manner.

It was realized and appreciated that for UP mills to be able to afford a cane price of Rs.280/- per qtl. and to break even, the average sugar price should be Rs.3600/- per qtl. Admittedly, the State Govt., seeing the ground realities and the paying capacity of the sugar mills and the prevailing sugar price:



- i. did not increase the SAP for 2013-14 sugar season and the SAP was maintained at Rs.280/- per qtl. SAP was higher by Rs.70/- per qtl. as compared to the FRP of Rs.210/- per qtl.
 - ii. a) gave few concessions amounting to Rs.11/- per qtl., viz. waiver of purchase tax on sugarcane, waiver of entry tax on sugar and society commission to be borne by the State Govt.
b) assured that after seeing the financial results of the sugar mills, another Rs. 9/- per qtl. of cane price would be borne by the State.
 - iii. declared that the State Govt. of U.P. would put in place **in advance** a long term, economically sound and rationale sugarcane pricing policy based on well established, transparent and economic business principles, for the survival and growth of the sugar industry in the State and to make the sugar industry of the State competitive in comparison to the sugar mills of major sugar producing States like Maharashtra and Karnataka, which had already adopted a rational sugarcane pricing policy and a linkage formula to determine the cane price.
5. The sugar mills were accordingly forced to agree to pay Rs.260/- per qtl., however, with an assurance by the State Govt. that if the financial situation so demands, further assistance, subsidy and help would be deliberated and given to the sugar mills to bridge the gap between the paying capacity of the mills and the cane price payable.

At that time, the sugar price was Rs.3000/- per qtl., on the basis of which, the paying capacity of cane price worked out to be Rs.225 per qtl. Therefore, the losses were written on the wall. But again on hypothetical basis, the State Govt. pressurized and prevailed upon the mills that the sugar price would improve substantially and sugar mills would earn a profit even after paying Rs.260/- per qtl. or the State Govt. **will extend the financial help and subsidy.** This never happened and the average sugar price for the year 2013-14 remained at Rs.3075/- per qtl., as per which the paying capacity of the sugar mills for cane price works out to Rs.231/- per qtl. This is substantially less as compared to the forced cane price (SAP) of Rs.280/- per qtl.



6. Despite the assurance, the Govt. has not extended any financial **help** of Rs.9 per quintal and **further help of Rs.29/-** per qtl. (i.e. Rs.260- Rs.231 = Rs.29/- per qtl). Nobody is addressing the issue that with such huge losses suffered by the mills as a result of higher cane price, from where the cane arrears would be paid and mills would be run? Nobody is also bothering and considering that the mills should also earn reasonable profits from the sugar business and should survive with respect and dignity in the larger interest of the State and the farmers. On the contrary, the sugar mills and their directors, officers and staff have been subjected to multiple coercive actions, knowing fully well that this present situation was fully known to the government well in advance and due to this only the sugar mills were hesitant to commence operations in October 2013.
7. The sugar mills based upon the assurances, promises and commitments made by the State Govt. of U.P., started crushing operations in the year 2013-14 with the hope that if need be the State Government would come forward with financial help beyond Rs.20 per quintal of cane. More importantly, they went ahead with the understanding and hope that from the next sugar season, there would be a rational cane pricing policy by which cane price would be determined in direct relation to the revenue realized from sugar and by-products. The sugar mills therefore expected that with the assured help from the State, they will not suffer any further losses in the year 2013-14 and may in fact be able to even earn a reasonable profit. But not only did the situation not improve and the sugar mills are going to suffer a loss of around Rs 3500/- crore, aggravating the financial crisis, but the assurances of the State Govt. too did not materialize. This has resulted in the non-payment of cane price and other unbearable crisis and pain to the sugar mills.
8. The State Govt. as per its commitments constituted the following two Committees vide order dated 10.1.2014:
- for arriving at a long term and viable cane price fixation system to rationalize the cane pricing policy, similar to that adopted by Maharashtra and Karnataka States.



ii. for providing an interim relief of Rs.9/- per qtl. considering the sugar price realization and financial position of mills.

The Committees were directed to give their report within three months i.e. latest by 30.4.2014. However, these Committees have not submitted their reports so far and therefore no progress has taken place in either of these assurances. Not only has there been therefore, no decision on a rational cane pricing formula, but the Rs.9/- per qtl. of cane, which would work out to around Rs.700 crore, has not been released to the sugar mills despite the fact that the adverse financial position of the mills and depressed sugar prices are known to the State Govt. The mills will be able to realize enough to be able to afford only Rs.231/- per qtl. of cane price.

9. We have submitted several representations to the State Govt. including the representations dated 4.6.14, 18.6.14, 8.7.14, 21.7.14 and 25.7.14 apprising all concerned authorities about the factual and financial position of the sugar mills and begged for financial help so that the mills could come out of the crisis. Copies of letters dated 21.7.14 and 25.7.14 are enclosed for your ready reference. (Marked as Annexure -1 and Annexure-2 respectively). No response or reply has been received to our requests and representations so far. Instead, FIRs have been lodged against the sugar mills. Recovery proceedings to recover the cane price have been launched against the mills, besides other actions, knowing fully that the sugar mills of U.P. have suffered losses in the year 2013-14, only as a result of higher cane price fixed by the State Govt. and non-availability of financial help and assistance by the State Govt.

10. It has always been stressed by the authorities that with a view to regulate the supply and purchase of sugarcane required for use in sugar factories and gur, rab, or khandani sugar manufacturing units, the State Govt. of U.P. enacted the U.P. Sugarcane (Regulation of Supply and Purchase) Act, 1953 and framed the Rules there under. The said Act and Rules framed thereunder embodies a concept to ensure a fair deal to the sugarcane growers as also to promote sugar industries and to maintain harmony between the cane growers and the sugar manufacturers and to enable both of them to share reasonable



profits. The competitive interests of the sugarcane growers and sugar manufacturers are to be protected by the State Govt. But Sir, the sugar mills have not been ever given a fair deal or reasonable profits, rather the mills have been plunged into losses by fixing the high cane prices, which had no correlation with the sugar price or the paying capacity of the mills.

11. Sir, you will agree that cane can be purchased at an affordable price. If the mills purchase or are forced to purchase the cane at an unaffordable cane price, the mills will not be able to pay the cane price, leading to non-payment of sugarcane price. With high cane price arrears, mills have to, year after year, face coercive and uncalled actions from the State Govt., besides causing unbearable civil, criminal and penal consequences including facing of uncalled for public interest litigation and court orders thereof, for no fault of theirs. It is to be appreciated that the sugar mills cannot be forced to purchase the sugarcane at a cane price which is beyond their paying capacity and which the mills cannot pay or afford to pay and for which causes losses to the sugar mills.

12. The Central Govt. has already declared and fixed the FRP at Rs.220/- per qtl. linked to 9.5% recovery from sugarcane, for the season 2014-15 vide order dated 14.2.2014. The sugar mills are ready and willing to commence and run their manufacturing operations on the basis of FRP and in all fairness will also share further benefits from better revenue realization from better sugar prices after the end of the season.

13. You will recall that Rangarajan Committee had recommended for adoption of the revenue sharing model of cane pricing, followed world-over, recommending for a sharing of revenue/value created in the sugarcane value chain, between the farmers and the millers in a fair and equitable manner. The Central Govt. had accordingly referred these recommendations to the State Governments, including to the U.P. Govt., suggesting for adoption and implementation of the formula.

We understand that such a reference has again been made recently by Central Government vide their letter on 30th June, 2014 (copy enclosed), wherein the Food Ministry, Govt. of India, has while referring to the information



given by the Hon'ble CM of UP, about the Committee under Chief Secretary on the 'linkage formula' for cane pricing, expressed ignorance on the outcome of the Committee's meetings or its recommendations. Central Government has even requested therein that the U.P. Govt. should immediately take a decision on the linkage formula so that sugar mills start their crushing on time and farmers get their cane price payments on time.

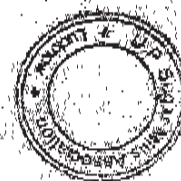
It is pertinent to point out that even the Central Government in its recent Affidavit filed before the Hon'ble High Court has also observed thus ***"That the problem of cane price arrears arises when realization by sugar mills from sale of sugar is not enough to pay the cane prices to the farmers. Surplus production over domestic consumption in the last three sugar seasons and low exports due to subdued international sugar prices have led to building up of sugar stocks with the mills. This has adversely affected the financial health of the mills and led to cane price arrears. Though the Government fixes Fair & Remunerative Price of sugarcane on the recommendations of CACP, fixation of higher cane price by some of the States compounds the problem"***.

14. Two major sugar producing States i.e. Maharashtra and Karnataka, who together contribute for almost 50% of the country's sugar production, have already adopted and implemented the 'linkage formula' so as to determine cane price automatically at 70% of revenue realized from sugar and primary by-products or 75% of revenue realized from sugar alone. But in case of U.P., even the report of the Committee under Chief Secretary has not been submitted.

We believe that a Committee of senior officials from the State had visited Maharashtra and Karnataka to study the cane pricing system therein and have also submitted their report to the Government. We are sure they must have made some suggestions, including the good practices of these States where the cane pricing policy is working very well, cane price arrears are always under control and there is no SAP fixed therein. Adoption of the system of



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these States would have also helped the U.P. mills become competitive with the mills therein.

15. Losses being incurred by the sugar mills across the State is evident from the fact that even the State run mills are unable to pay the cane price to farmers on time. The State has been, year after year, giving grants/subsidies to its co-operative mills, for making payments to their farmers. This year too Rs.400 crore has been sanctioned and expected to be disbursed to the co-operative mills. This works out to Rs.58/- per quintal of cane subsidy to the co-operative mills, implying a paying capacity of Rs.222/-per quintal of cane by the co-operative. However, no commensurate financial help has been provided to the private mills in the State, indicating unfair treatment of farmers supplying cane to private sugar mills. Such operation is continuously against the interest of the stakeholders of the sugar mills.

16. In order to allow mills to make prudent business decisions, they should know the cane pricing policy well in advance, before they furnish the estimates of cane requirement, which will determine the cane price they will pay, without any coercion or compulsion. In the absence of knowledge of payable and affordable cane price, the consultation process as provided in law is a mere formality. The Association, on behalf of its members, vide letter dated 28.7.14, had again requested the Cane Commissioner and the other authorities to allow the sugar mills to submit the estimates of cane requirement on the basis of FRP and the recommendations of the Rangarajan Committee. But the sugar mills were not allowed to do so, even though the offer of the sugar mills is much more than the minimum support cane price formula. In the present conditions, the employees and the staff of the sugar mills are also not ready to face coercive action by multiple FIRs and harassment for no fault of theirs.

17. Price of sugarcane constitutes a major portion of the total price and manufacturing cost of sugar. Therefore, it indisputably has a great role to play towards the fate of sugar mills. It cannot be the intention of the State Govt. or law to contemplate that manufacturer of sugar must continue their activities although the mills are running at loss or will suffer losses due to higher cane price, which cannot be recovered from the price of the sugar. Therefore, it is



essential for the mills to know the economics of cane and sugar price, before deciding and planning their manufacturing operations. In a business scenario, the sugar mills are also entitled to get reasonable profits from the business. It is to be appreciated that cane price, sugar price and market conditions are beyond the control of the sugar mills, therefore, in all fairness a tangible, logical and transparent solution of determining the cane price is required before carrying out any exercise towards the commencement of crushing operations. This has been already done by the Maharashtra and Karnataka State Governments.

18. Sir, the sugar mills of U.P. are ready and willing to commence their manufacturing operations in the season 2014-15, if there is some certainty on the formula for determination of cane pricing. The sugar mills cannot plan to commence the operations or purchase of cane if the cane price is continued to be fixed by the State arbitrarily and unreasonably at high levels. The sugar mills are not in a position to commence their operations unless there is a transparent and rational 'linkage formula' to determine the cane price similar to what has been adopted in Maharashtra.

19. Despite assurances, the financial commitments, as mentioned above, made by the State Govt. for the year 2013-14, remains unfulfilled and a rationalized cane pricing policy based on recommendations of Rangarajan Committee or a 'linkage formula' similar to that adopted in Maharashtra, has not been formulated. Instead, RCs, FIRs and arrests alongwith other coercive steps are being adopted by the State. The UP sugar industry, through its representative body, UPSMA, had vide its letter dated 8.7.2014 requested for the above before 31st of July, 2014, and had submitted that in the absence of these, the sugar mills will have no other option but to serve suspension of operations notices immediately thereafter.

20. The sugar mills are not being allowed to submit their estimates of cane requirement or purchase the cane at a fair and remunerative cane price fixed by the Central Govt. and even the genuine offer of the sugar mills offering to make additional cane price payment over and above the fair and remunerative cane price based upon the financial results of the sugar mills, as explained



hereinabove, has not been considered and accepted by the Govt. of U.P. Now, in the above premises and in the absence of any clarity from the U.P. Government on the adoption of the 'linkage formula' for 2014-15 sugar season and on giving above mentioned financial benefits, as was assured to the mills by the State Government, the sugar mills are not in a position to commence their manufacturing operations and purchase cane for the season 2014-15, for the reasons beyond their control, as stated above.

21. The sugar mills are, therefore, constrained to hereby serve "notice of suspension of cane crushing operations". The sugar mills are forced to discontinue all their work towards maintenance and repairs of plant and machinery, and accordingly withdrawing their staff, officials and labour from the factories. The mills are also informing the concerned authorities of their suspension notice.

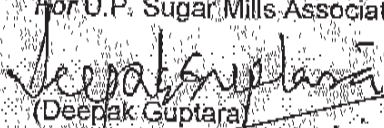
The sugar mills will resume their repair and maintenance or decide on crushing operations once there is clarity that the price to be paid for the sugarcane is affordable, determined as per the 'linkage formula' in relation to the revenue realised from sugar and/ or primary by-products, similar to that adopted by Maharashtra Government as well as the other assurances on the financial help and grants are announced.

The individual mills may send the notices separately.

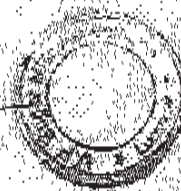
Thanking You,

Yours faithfully,

For U.P. Sugar Mills Association


(Deepak Gupta)
Secretary

Encl: As Above.



CERTIFIED TRUE COPY

For S.M.A.


Arjun Samant
Secretary

CC: The Principal Secretary, Sugar Industry & Cane Development
Department, U.P. Government, Babu Bhawan, Lucknow- 226 001
CC: The Cane Commissioner, Uttar Pradesh, Lal Bahadur Shastri Ganna
Kisan Sansthan, Bahumanzila Bhawan, New Berry Road, Lucknow.

(Deepak Gupta)

Ref No. 177 /63/2014

Date: 21.7.2014

The Cane Commissioner,
Uttar Pradesh
Lal Bahadur Shastri Ganna Kisan Sansthan,
Bahumanzila Bhawan,
New Berry Road,
LUCKNOW - 226 001

Subject:- Estimates of requirement of quantity of cane by the sugar mills for the crushing season 2014-15 for the purpose of Section 15 of the U.P. Sugarcane (Regulation of Purchase and Supply) Act, 1953

Dear Sir,

Directions have been issued to our member Sugar Mills vide letter No. 653/C/Kray/ GA /2014-15 dated 1.7.2014 under Section 12 of the U.P Sugarcane (Regulation of Supply and Purchase) Act, 1953, directing them to furnish estimates of the quantity of Cane which will be required by the sugar mills for the crushing season 2014-15 for the purpose of compliance under Section 15 of the said Act.

In this regard, it is humbly submitted that our member sugar mills are not aware of the cane price at which they will be required to pay for the purchase of cane for the crushing season 2014-15. The cane price fixed by the State Govt. over and above the fair and remunerative cane price (FRP) fixed by the Central Govt., in the previous years including for the season 2013-2014 had caused huge losses to the sugar mills. In fact, the sugar mills have not been able to even recover the cost of manufacturing of sugar as a result of higher cane price. It is to be appreciated that the mills should also get at least the fair and remunerative return from the manufacturing of sugar. This scenario has caused huge financial crisis resulting into cane price arrears. More over due to excessive Cane price combined with low sugar realizations there were arrears of cane price in the previous years as well. The same were paid out of the generation of funds in the current year, which has further aggravated the situation. Under the

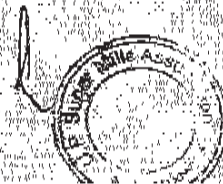


circumstances the member sugar mills do not want to purchase the cane at a price, which they cannot afford and may not be in a position to pay at a later stage. Without knowledge of the price to be paid the mills are not in a position to commit themselves with any requirement of Cane. We understand that the member mills have also responded individually to the aforesaid letter dated 1.7.2014.

Please appreciate that the cane price fixed by the State Govt. has no co-relation with the sugar price and realizing this situation the State Govt. has also appointed a Committee vide notification dated 10.1.2014 to arrive at an acceptable formula of fixing the cane price, considering the expert opinion like that of Dr. Rangarajan Committee and others, besides, formulae recently adopted by other major sugar producing States Maharashtra and Karnataka, so that the sugar mills of U.P. can also withstand the competition and at the same time afford to pay the cane price. Report of this Committee has not come so far despite a lapse of considerable time.

It is re-emphasized that the cane price is an important element in sugar business and unless the sugar mills know in advance the cane price and its affordability, based upon the paying capacity and the sugar prices, the mills are unable to submit estimates of cane requirement.

The Central Govt. has already declared the FRP for the season 2014-15 well in advance. It would be appreciable that the State Government also fixes the cane price in advance so that all concerned including the Farmers and Mills, know the price before making any commitment for supply or purchase. Our member sugar mills can, however, submit their estimates of cane requirement on the basis of the FRP and sharing further payment towards the cane price on the basis of Dr. Rangarajan Committee formula. This way the farmers will get fair and remunerative price and at the same time would also stand to get additional cane price, if the price realization to the mills goes up. Under such a set-up the sugar mills may also get some reasonable return on their investments. Thus it would be beneficial to all stake holders in the long run, including the farmers.



We have already apprised all concerned authorities of the State about the situation faced by the sugar mills of U.P through various representations and letters. Recently, we have also sent a representation dated 8.7.2014 to the Hon'ble Chief Secretary of Uttar Pradesh. We await response for a suitable action on the same. A copy of the representation dated 08.07.2014 is enclosed for your kind perusal.

It is, therefore, requested that the assessment of requirement of Cane for the season 2014-15 be kept in abeyance till a decision is taken on said representation dated 08.07.2014.

We would be thankful,

Yours Faithfully
For U.P. Sugar Mills Association

(Deepak Gupta)
Secretary

CERTIFIED TRUE COPY

FEDERATED SUGAR MILLS LIMITED

[Signature]
Kamini Samant
Company Secretary

CC: Chief Secretary, Govt. of U.P., Lucknow

CC: Principal Secretary, Sugar & Development, Lucknow

With regards,
For kind information please,

[Signature]
(Deepak Gupta)
Secretary