

15th Dec 2009

Sub: Concerns raised by US Government for export of goods (including granite / stones) exported to US, produced by forced / indentured child labour.

We , the All India Granites & Stone Association have just learnt about the Notice of Initial Determination Updating the List of Products requiring Federal Contractor Certification as to Forced/Indentured Labour pursuant to Executive Order 13126 only five days ago and would like to provide our initial remarks.

At the outset, we have to make it clear that no child or forced labour are employed in granite and other ornamental / decorative building stone quarries and factories.

India's reserves of granite are among the largest in the world. Indian Granite Quarries are equipped with state-of-the art technology and heavy equipments like Poklain, drilling machine, wiresaw and dumpers in its mining / quarrying process. These equipments require highly skilled and physically fit workforce.

Our members are engaged in production of dimensional granite and other stones through various mechanized processing methods only, as such child labour doesn't arise.

For manufacturing all these products, the fundamental work starts with the production of dimensional blocks in the quarry. The modern stone quarrying has heavy earth moving equipments like Frontend loaders, Excavators, Derricks, Mobile Cranes, Dumpers, Pneumatic compressors and drillers, Hydraulic drillers, Diamond wiresaws and Stone splitters. For all these operations, technically qualified engineers, Quarry Foreman / Mines Managers, Mining Engineers and Quarry Masters with sufficient experience are mainly employed. Skilled workers are employed in handling the machines and the tools.

It is virtually impossible to use children in an industry that uses heavy blocks of granite and requires certain maturity and physical fitness to operate in such an environment.

At the entrance of every Quarry and factory that belongs to the members of our Association and other stone associations, it is made clear that children below the age of 18 are not employed.

In the factories, we are using imported machines, equipments, tools and handling machines. It is well known world over to all the importers and their inspection team from European countries, Japan, China, Taiwan, USA etc. that in the quarrying as well as processing in the factories only qualified and eligible persons above the age of 18 are working. The heavy machines used in the factories like Gangsaws, Diamond saws, Block

cutters, Polishing lines, Epoxy plant and other equipments cannot be operated by any unqualified persons. They are sophisticated that qualified high skilled and matured persons only can operate them.

Further, the issue of Child labour was discussed at various forums and it was established beyond any doubt that the child labour is not prevalent in the quarrying and processing industries of Dimensional Stones including sandstone.

Further, a group of Stone Magazine Editors from foreign countries visited many quarries and factories and they were impressed by the working of the factories and were fully convinced that there is no child labour in quarries, processing industry and monument manufacturing factories.

There is a confusion and misunderstanding due to the malicious campaign carried on by some vested interests from other countries and given negative publicity with the help of some NGOs to promote their own brand.

The Government of India through the Mines Safety Regulations, the State Governments through the Factories Act and the Rules and through the Minimum Wages Act are strictly implementing lawful work through lawfully working persons in the Dimensional Stone industry. All the Stone Associations / various State Associations and CAPEXIL, which is the Natural Stone Promotion Agency & Export Promotion Council are strictly monitoring legally permissible works through employing qualified and competent adult persons including unskilled labour force. Child labour is strictly prohibited.

We invite a team of independent persons from any country to find out the truth by themselves and visit any Dimensional Stone Quarry and factories in India. In the Granite Industry, absolutely there is no chance of any inexperienced unqualified non-adult being employed.

On behalf of All India Granites and Stone Association, we request the Indian Embassy to lodge a strong objection for including the stones allegedly employing forced child labour. We request the US Department of Labour that it will not rush and make any wrong conclusions prematurely.

We will send more detailed remarks refuting the allegation of use of forced child labour after studying the bibliography cited for the Department of Labour's decision to include stones in this initial list.

Thanking you,

Yours truly,

S. Muthurajan, President All India Granites & Stone Association

Email address: stona@stonaaigsa.com

Business Phone: +91-80-23612541, Fax: 91-80-23610993