

# The EU Proposal for Sustainability Labels Will Harm the World Cotton Industry: The Interests of Indian Cotton will be Harmed without Effective Intervention

With a Ph.D. in Agricultural and Resource Economics from Oregon State University in the USA, Dr. Terry Townsend is a consultant on commodity issues.

He is currently working with the African Cotton and Textile Industries Federation (ACTIF). He served as executive director of the International Cotton Advisory Committee (ICAC) and has also worked at the United States Department of Agriculture for five years, analyzing the U.S. cotton industry and editing a magazine devoted to a cross-section of agricultural issues. on the Higg Material Sustainability Indexes (MSI's), which are highly biased in favour of polyester and other synthetics.



Dr. Terry Townsend

While the aims of the EU are laudable, the current methodology behind the proposed PEF labels fails to account for key sustainability considerations, including the benefits of using renewable and biodegradable fibres, the adverse impacts of microplastic pollution and the full environmental footprint of fossil fuel fibres. Further, the Higg MSI's are based solely on environmental impacts without consideration for the enormous positive social impacts of natural fibre production.

# What Is PEF?

PEF was first proposed by the EC in April 2013, under the Building a Single Market for Green Products Initiative. The focus at that time was on developing methodologies to provide a harmonised system for measuring and validating environmental claims and ensuring a level playing field for competition between products made in different Member States.

The EC partnered with industry experts and private companies to develop a methodology designed to convey a finished good's environmental impact in a common, product-

The European Union is developing policies to encourage the development, production and consumption of products that are energy efficient, durable, reusable, repairable and recyclable. The intention of these policies is to shift Europe toward a climate-neutral circular economy.

As part of the circular-economy objective, the European Commission (EC) is moving forward with a proposal to require that all textile products sold in the EU carry Product Environmental Footprint (PEF) labels by 2023. As currently proposed, the PEF labels for fibres will be based level language that enables consumers to make informed decisions at the point of purchase.

The PEF uses lifecycle assessment (LCA) data to evaluate the environmental impact of materials. However, there are no LCA's for many fibres, and the LCA's that exist for polyester, polypropylene, nylon and acrylic ignore the beginning-of-life impacts associated with fossil fuel extraction, and they ignore the end-of-life impacts associated with non-biodegradability and plastic pollution.

As explained by Veronica Bates Kassatly, an independent analyst, "Life Cycle Assessments can only be compared if they follow exactly the same methodology and boundaries. Such a suite of generic LCA's for textile fibres does not exist. The EU cannot create non-fiscal barriers to trade that will negatively impact some of the poorest on the planet, without first commissioning the studies required."

# Why Does This Matter?

The implications for cotton consumption are large. If the EC goes forward as they currently intend, all products containing cotton will carry a red warning label at retail urging consumers not to buy them and instead purchase products made of polyester and viscose that will carry green labels. The expectation is that consumers faced with PEF labels at the point of sale will make purchasing decisions that favour the environment.

Currently, the language used in discussions of textile sustainability is disparate and inconsistent, largely due to a lack of common nomenclature and lax labelling requirements. This leads to high levels of greenwashing and consumer confusion, and the dearth of measurable sustainability standards has delayed the fashion value chain from truly addressing sustainability. Everyone in the cotton industry has a vested interest in ensuring that sustainability labels on clothing and home furnishings accurately reflect all environmental and social impacts of fibre production.

The EU's labelling initiative is likely to set a global standard that could bias all consumers against cotton, as well as other natural fibres. It's important to act now to ensure that measurement methodologies are right. Sustainability claims must be transparent, accurate and complete, allowing consumers to make informed choices about the products they buy.

## The Make the Label Count Campaign

The Make the Label Count campaign is composed of experts and organizations collaborating to promote awareness of this issue amongst European policy makers, asking them to amend the PEF methodology before implementation. The Make the Label Count campaign is an effort to raise awareness within the European Commission and members of the European Parliament about the deficiencies in the Higg MSI methodology and the need for a more wholistic appraisal of the environmental and social impacts of fiber production.

The International Wool Textile Organization (IWTO) located in Brussels, has taken the lead in organising the Make the Label Count campaign. Australian Wool Innovation (AWI) has been active in organising the campaign and in providing technical information to the EC committee establishing the metrics by which PEF's for fibers will be calculated.

The Discover Natural Fibres Initiative (DNFI), an outgrowth of the International Year of Natural Fibers 2009, is also a founding member of the coalition. There are alpaca, silk and several additional wool organisations involved as members of the campaign. However, given that cotton accounts for about 80% of world natural fibre production, there is a glaring lack of support from the world cotton industry, with only Cotton Australia being formally involved.

Members of the Make the Label Count campaign are asking all natural fibre organisations to join the campaign to advocate for a PEF methodology that will protect consumer confidence and will ensure the accurate reporting of the environmental and social impacts of natural fibre industries.

# What Should Consumers Know?

Members of the Make the Label Count Campaign believe consumers should be able to trust sustainability claims on their clothing labels. Specifically, the Campaign is advocating for the following modifications to the proposed PEF methodology for fibres:

## **Renewability and Biodegradability**

Only products made from renewable raw materials can be truly sustainable. The inherently circular attributes of natural fibres, including renewability at start-of-life and biodegradability at the end-of-life, need to be accounted for in a credible product claim. Inclusion of parameters to account for biological circularity could address this limitation.

# **Equitable Comparison of Fibres**

The impact of forming natural fibres is fully accounted for in the current PEF methodology, but the full impact of forming fossil fuel-based fibres (starting with fossil fuel extraction) is not accounted for at all. The same system boundary should be used for natural and fossil fuel fibres to inform consumer choices.

### **Social Impacts**

According to DNFI, natural fibre industries generate between US\$50 billion and \$60 billion in farm-level income each year, and the agricultural components of natural fibre value chains provide employment for approximately 200 million people. The socio-economic impact of fibre production is not considered in the PEF methodology. Credible measures of sustainability encompass planet, people and prosperity.

# Accounting for Microplastics

The environmental impacts of microplastic pollution should be included in PEF estimations to inform consumer choices. Laundering synthetic clothes accounts for 35% of primary microplastics released into the environment.

### **Duration of Service**

The consumer use-phase has a major influence on a garment's environmental footprint. Factors that extend the lifetime of clothing, including odor resistance, wrinkle resistance, less frequent laundering, and the rate of reuse by further owners should be included in PEF methodology.

### **Production Practices**

The impacts of fibre production are assessed without considering whether sustainable agricultural management practices are used. By failing to assess and provide incentives for sustainable agricultural practices, an important opportunity to achieve the EU's goal of 'protecting and restoring natural ecosystems' will be lost.

# What Can CAI Do?

As noted by Ms. Dalena White, Make the Label Count co-spokesperson and Secretary General of the International Wool Textile Organization, "We've had major advancements in research and knowledge around the environmental impacts of the textile industry, but these aren't yet included in the current PEF methodology. If the Commission proceeds to use the PEF without updating it, the fashion and textile industry won't make the green transition we all want to see."

The Cotton Association of India can join the Make the Label Count Campaign. (There are no dues or fees for membership.) By joining the campaign, CAI can raise its own profile internationally while it joins other organisations in advocating for improvements to PEF for clothing sustainability claims on labels in the EU.

CAI can communicate with policy makers in New Delhi to ensure that representatives of the Government of India in Brussels are aware of the activities of the European Commission relative to PEF labels. It is important that the concerns of the Government of India with the current incomplete PEF methodology are communicated appropriately.

For more information about Make the Label Count:

Watch the recording of the Make the Label Count launch event on October 13 with EU policymakers, academics, and industry representatives. https:// www.makethelabelcount.org/.

Sign up to the Make the Label Count newsletter to stay up to date on the latest news and events at www.makethelabelcount.org.

Follow Make the Label Count on Twitter and LinkedIn.

Share content and get involved in the conversation.

As explained by Livia Firth, Make the Label Count co-spokesperson and Creative Director of Eco-Age, "Credible claims in the fashion industry is a fundamental step towards ensuring consumers make informed choices when buying garments. The fact that this is now being implemented at EU level is wonderful. But it is fundamental for claims on labelling to be accurate and comprehensive, so it does not misrepresent or unfairly favour certain fibre groups. This is why I am proud to be working on the Make the Label Count campaign, calling for a level playing field for sustainability claims and in doing so, drive the change we so urgently need."

Together we can make the label count!

(The views expressed in this column are of the authors and not that of Cotton Association of India)

# **USD INR: View For The Next Three Months**

Shri. Anil Kumar Bhansali, Head of Treasury, Finrex Treasury Advisors LLP, has a rich experience of Banking and Foreign Exchange for the past 36 years. He was a Chief Dealer with an associate bank of SBI

Dollar Rupee has been in the range of 72.92 to 75.66 in the past three months the dollar was biddish in the past two months due to the following reasons:

1. Oil moved up from \$ 68 to \$ 86. India has been one of the biggest oil consumer in the world.

2. Demand from oil companies particularly ONGC, RIL and BPCL to cope up with the busy season and festival demand.

3. Coal and gas prices moved higher and as there was a shortfall of coal in the world and the Government wanted to ensure that there was no shortfall of petrol and diesel.

4. Oil was cheaper than coal and gas and therefore was more in demand.

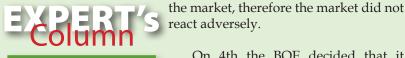
5. Supply of dollars came down a bit as FED had indicated that they would start the tapering of their bond buying programe from November and complete it by mid of 2022.

6. There were hardly any inflows for IPOs as the number of new issues had dwindled in October-2021.

7. As the festival seasoned commenced and a slate of IPOs like that of Nykka, Policy Bazaar and PayTM, the flows commenced again and the rupee after making a low of 75.66 recovered and closed at 74.46 on 03rd of November-2021. With biggest IPO of PayTM commencing on 8th of November 2021, the flows are expected to increase.

# Important Events on 3rd 4th and 5th of November 2021

On 3rd the Fed in its meeting decided on the tapering issue and announced that it would begin asset tapering in November to the tune of \$15 billion. On interest rates, the Fed Chairman Jerome Powell added that the Central Bank would be "patient" on the timetable for interest rate hike. The market had already factored in the tapering and since the amount of tapering was as per the expectations of





Shri. Anil Kumar Bhansali levels. Brent Crude rose \$ 2.20 to Head of Treasury, Finrex Treasury Advisors LLP

settle at \$ 82.74 per barrel. The OPEC and Russia largely stuck to a plan to raise oil output by 400,000 barrels per

On 4th OPEC decided to rebuff a

On 4th the BOE decided that it

would not be raising the interest rates.

The sterling fell sharply following the announcement. The Bank also

continued the existing programme of UK Government of bond purchases at a

call of US to accelerate output increases

even as demand nears pre-pandemic

target stock of Pound 875 billion.

day from December.

China's Forex Reserve rose in October-21 for the first time since July by 0.53% from a month earlier to \$ 3.218 billion. Despite the recurring Covid-19 pandemic and uncertainties amongst global economic recovery, China's economy continues to recover with strong resilience and huge potential.

The U.S trade deficit hit a record of \$80.9 billion in September which is an all-time high the previous being \$ 73.2 billion in June. The U.S exports fell sharply while imports rose even with supply chain problems at U.S ports. The trade deficit with China rose to \$41 billion.

The United States added 531000 jobs in October and the unemployment rate fell slightly to 4.6%. Hiring figures for September were also revised higher from 194000 to 312000 and that of August from 366000 to 483000. The 4.9% growth in averaging earnings over the past year however, doesn't outpace annual inflation which was running at 5.4% in September.

## **Prospects For the Next Three Months**

It being a busy season, the flows will continue in the next 3 months, as a number of companies have applied for IPOs to SEBI. Upticks can be possible if RBI protects 73.80 and 74.00 levels and oil companies continue to buy \$ for hedging their payables. However, we do not expect the rupee to fall too much from here to levels of 77. The range continues to be between 73 to 75.80. RBI has ensured that exporters and importers both get a chance for hedging their receivables and payables respectively. On every alternate month the rupee shows lows and highs. Currently the rupee is at levels of 74.10 which seems to be a good support

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for the dollar and therefore the imports should get hedged. The effect of tapering has been fully captured by the market while interest rate hikes seem to be a bit far off for now. Oil is the only concern for now which could affect our CAD and trade deficit. But a lower \$ rupee should counter the effect partly.

The LIC IPO is a bit far away in March-2022. BPCL divestment also may happen in 2022 only. Meanwhile, exporters can hedge all upticks towards 75 levels for a longer term while importers can hedge their near term upto December-21 at levels between 73.80 to 74.15. Overall, the rupee is going to be in a range which should be adhered to by buying \$ at the lower end of the range and selling dollars at the higher end of the range.

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# CAI Estimates Cotton Crop for 2021-22 Season at 360.13 Lakh Bales

Cotton Association of India (CAI) has released its first estimate of the cotton crop for the new season 2021-22 beginning from 1st October 2021.

CAI has estimated cotton crop for the 2021-22 crop year at 360.13 lakh bales of 170 kgs. each, which is equivalent to 382.64 lakh running bales of 160 kgs. each. State-wise break up of cotton production and Balance Sheet for the Season with the corresponding data for the previous cotton season are given below.

This is a preliminary estimate and the Crop Committee of the CAI will re-assess the crop as the Season progresses.

The crop estimated for the 2021-22 season is more by 7.13 lakh bales of 170 kgs. each (equivalent to 7.58 lakh running bales of 160 kgs. each) than the previous year's crop of 353.00 lakh bales of 170 kgs. each (equivalent to 375.06 lakh running bales of 160 kgs. each).

The state-wise loose cotton production figures have been adopted as per the Report of Sardar Vallabhbhai Patel International School of Textile Management on Survey of Loose Cotton Production & Consumption in India. As per this Survey Report, the loose cotton production figures for the 2020-21 crop year were less by 25% at 5.45 lakh bales of 170 kgs. each since the said crop year was a pandemic year).

Yearly Balance Sheet projected by the CAI Crop Committee estimated total cotton supply till end of the 2021-22 Season i.e. upto 30th September 2022 at 445.13 lakh bales of 170 kgs. each (i.e. 472.95 lakh running bales of 160 kgs. each), which consists of the opening stock of 75.00 lakh bales of 170 kgs. each (equivalent to 79.69 lakh running bales of 160 kgs. each) at the beginning of the Season, crop for the Season estimated at 360.13 lakh bales of 170 kgs. each (equivalent to 382.64 lakh running bales of 160 kgs. each) and imports for the Season estimated at the same level as in the last year i.e. at 10 lakh bales of 170 kgs. each (equivalent to 10.63 lakh running bales of 160 kgs. each).

Domestic consumption for the 2021-22 crop year is estimated by the CAI at the same level as in the last year i.e. at 335.00 lakh bales of 170 kgs. each (equivalent to 355.94 lakh running bales of 160 kgs. each). The exports of cotton season 2021-22 estimated by the CAI are 48.00 lakh bales of 170 kgs. each (equivalent to 51.00 lakh running bales of 160 kgs. each) as against 78 lakh bales of 170 kgs. each (equivalent to 82.88 lakh running bales of 160 kgs. each) estimated for 2020-21.

The carry over stock estimated at the end of the Season on 30th September 2022 is 62.13 lakh bales of 170 kgs each (equivalent to 66.01 lakh running bales of 160 kgs each).

# Highlights of the Deliberations held at the Virtual Meeting of the Crop Committee of Cotton Association of India on 29th October 2021

Crop Committee of Cotton Association of India (CAI) held its meeting on 29th October 2021 by video conferencing. In all, 25 members across all segments of the cotton value chain in India participated in this meeting.

Based on the data available from various trade sources, upcountry associations and other stakeholders, the Committee has arrived at the first estimate of the cotton crop for the Season 2021-22 beginning from 1st October 2021 and drew estimated cotton balance sheet. The imports and exports estimates for the Season have been arrived at based on the input received from MNCs and major import-export houses.

	Production Estimate *									
State	202	1-22	2020-21							
State	In running b/s of 160 Kgs. each	In lakh b/s of 170 Kgs. each	In running b/s of 160 Kgs. each	In lakh b/s of 170 Kgs. each						
Punjab	10.70	10.07	11.16	10.50						
Haryana	17.64	16.60	23.91	22.50						
Upper Rajasthan	15.50	14.59	20.72	19.50						
Lower Rajasthan	12.84	12.08	13.81	13.00						
Total North Zone	56.67	53.34	69.59	65.50						
Gujarat	103.05	96.99	97.22	91.50						
Maharashtra	91.86	86.46	86.06	81.00						
Madhya Pradesh	21.78	20.50	19.66	18.50						
Total Central Zone	216.70	203.95	202.94	191.00						
Telangana	48.78	45.91	46.75	44.00						
Andhra Pradesh	15.19	14.30	17.00	16.00						
Karnataka	27.15	25.55	25.50	24.00						
Tamil Nadu	10.63	10.00	7.97	7.50						
Total South Zone	101.75	95.76	97.22	91.50						
Orissa	4.34	4.08	3.19	3.00						
Others	3.19	3.00	2.13	2.00						
Total	382.64	360.13	375.06	353.00						

CAI's Estimates of Cotton Crop for the Season 2021-22 and 2020-21

(in lakh bales of 170 kg.)

The following are the highlights of deliberations of the Crop Committee of the CAI: -

# 1. Consumption

The yearly consumption estimated by the CAI for the current crop year 2021-22 is 335 lakh bales of 170 kgs. each (equivalent to 355.94 lakh running bales of 160 kgs. each), which is the same as in the last year.

### 2. Production

The cotton crop for the season 2021-22 has been estimated by the CAI at 360.13 lakh bales of 170 kgs. each (equivalent to 382.64 lakh running bales of 160 kgs. each), which is more by 7.13 lakh bales than the previous year's crop estimate of 353.00 lakh bales of 170 kgs. each (equivalent to 375.06 lakh running bales of 160 kgs each.

### 3. Imports

The CAI has estimated cotton imports for the 2021-22 season at the same level of 10 lakh bales of 170 kgs. each (equivalent to 10.63 lakh running bales of 160 kgs. each) as estimated by it for the last year.

# 4. Exports

The cotton exports for the 2021-22 season have been estimated by the CAI at 48.00 lakh bales of 170 kgs. each (equivalent to 51 lakh running bales of 160 kgs. each based on the input received from exportermembers. This export-estimate for the 2021-22 season is lower by 30 lakh bales compared to 78 lakh bales of 170 kgs. each (equivalent to 82.88 lakh running bales of 160 kgs. each).

# 5. Closing Stock as on 30th September 2022

Closing stock as on 30th September 2022 estimated by the Committee is 62.13 lakh bales of 170 kgs. each (equivalent to 66.01 lakh running bales of 160 kgs. each).

# The Balance Sheet drawn by the Association for 2021-22 and 2020-21 is reproduced below:-

(in lakh bales of 170								
Details	2021-22	2020-21						
Opening Stock	75.00	* 125.00						
Production	360.13	353.00						
Imports	10.00	10.00						
Total Supply	445.13	488.00						
Mill Consumption	292.00	292.00						
Consumption by SSI Units	25.00	25.00						
Non-Mill Use	18.00	18.00						
Total Domestic Demand	335.00	335.00						
Available Surplus	110.13	153.00						
Exports	48.00	78.00						
Closing Stock	62.13	75.00						

\*One time adjustment of 17.50 lakh bales made in the Opening stock i.e. 107.50 lakh bales to 125.00 lakh bales by the CAI Statistics Committee in the meeting held on 6th January 2021.

				l	UPCOUI	NTRY SP	OT RAT	ES				(Rs	s./Qtl)
Standard Descriptions with Basic Grade & Staple in Millimetres based on Upper Half Mean Length [ By law 66 (A) (a) (4) ]								Sp	13413 13554   (47700) (48200) O O   - - -   14426 14566 - -   15185 15325 L L L				
Sr. No	. Growth	Grade Standard	Grade	Staple	Micronaire	Gravimetric Trash	Strength /GPT	1st	2nd	3rd	4th	5th	6th
1	P/H/R	ICS-101	Fine	Below 22mm	5.0 - 7.0	4%	15	-	-	-			
2	P/H/R (SG)	ICS-201	Fine		5.0 - 7.0	4.5%	15	-	-	-	Н	Н	Н
3	GUJ	ICS-102	Fine	22mm	4.0 - 6.0	13%	20	11023 (39200)					
4	KAR	ICS-103	Fine	23mm	4.0 - 5.5	4.5%	21	12260 (43600)	12401	12373			
5	M/M (P)	ICS-104	Fine	24mm	4.0 - 5.5	4%	23	13273 (47200)	13413	13554	0	0	0
6	P/H/R (U) (SG)	ICS-202	Fine	27mm	3.5 - 4.9	4.5%	26	-	-	-	U	0	
7	M/M(P)/ SA/TL	ICS-105	Fine	26mm	3.0 - 3.4	4%	25	14144 (50300)					
8	P/H/R(U)	ICS-105	Fine	27mm	3.5 - 4.9	4%	26	-	-	-			
9	M/M(P)/ SA/TL/G	ICS-105	Fine	27mm	3.0 - 3.4	4%	25	15044 (53500)	15185 (54000)	15325 (54500)	L	L	L
10	M/M(P)/ SA/TL	ICS-105	Fine	27mm	3.5 - 4.9	3.5%	26	15466 (55000)	15747 (56000)	15888 (56500)			
11	P/H/R(U)	ICS-105	Fine	28mm	3.5 - 4.9	4%	27	-	-	-			
12	M/M(P)	ICS-105	Fine	28mm	3.7 - 4.5	3.5%	27	17434 (62000)	17716 (63000)	17716 (63000)			
13	SA/TL/K	ICS-105	Fine	28mm	3.7 - 4.5	3.5%	27	17491 (62200)	17772 (63200)	17772 (63200)	Ι	Ι	Ι
14	GUJ	ICS-105	Fine	28mm	3.7 - 4.5	3%	27	17491 (62200)	17772 (63200)	17772 (63200)			
15	R(L)	ICS-105	Fine	29mm	3.7 - 4.5	3.5%	28	-	-				
16	M/M(P)	ICS-105	Fine	29mm	3.7 - 4.5	3.5%	28	-	-	-			
17	SA/TL/K	ICS-105	Fine	29mm	3.7 - 4.5	3%	28	-	-	-	D	D	D
18	GUJ	ICS-105	Fine	29mm	3.7 - 4.5	3%	28	-	-	-			
19	M/M(P)	ICS-105	Fine	30mm	3.7 - 4.5	3.5%	29	-	-	-			
20	SA/TL/K/O	ICS-105	Fine	30mm	3.7 - 4.5	3%	29	-	-	-			
21	M/M(P)	ICS-105	Fine	31mm	3.7 - 4.5	3%	30	-	-	-	А	А	А
22	SA/TL/ K / TN/O	ICS-105	Fine	31mm	3.7 - 4.5	3%	30	-	-	-			
23	SA/TL/K/ TN/O	ICS-106	Fine	32mm	3.5 - 4.2	3%	31	-	-	-			
24	M/M(P)	ICS-107	Fine	34mm	2.8 - 3.7	4%	33	-	-	-			
25	K/TN	ICS-107	Fine	34mm	2.8 - 3.7	3.5%	34	-	-	-	Y	Y	Y
26	M/M(P)	ICS-107	Fine	35mm	2.8 - 3.7	4%	35	-	-	-			
27	K/TN	ICS-107	Fine	35mm	2.8 - 3.7	3.5%	35	-	-	-			
_								-	-	-			

(Note: Figures in bracket indicate prices in Rs./Candy)

					UPCOU	NTRY SP	OT RAT	ES				(Rs	s./Qtl)	
Standard Descriptions with Basic Grade & Staple in Millimetres based on Upper Half Mean Length [ By law 66 (A) (a) (4) ]								Sp	Spot Rate (Upcountry) 2021-22 Crop November 2021   1st 2nd 3rd 4th 5th 6th   14538 14679 14819 522000 (52700) 522000 522000 14988   14707 14847 14988 H H H   123000 (52800) (53300) H H H					
Sr. No	. Growth	Grade Standard	Grade	Staple	Micronaire	Gravimetric Trash	Strength /GPT	1st	2nd	3rd	4th	5th	6th	
1	P/H/R	ICS-101	Fine	Below 22mm	5.0 - 7.0	4%	15							
2	P/H/R (SG)	ICS-201	Fine	Below 22mm	5.0 - 7.0	4.5%	15	14707	14847	14988	Н	Н	Н	
3	GUJ	ICS-102	Fine	22mm	4.0 - 6.0	13%	20	-	-					
4	KAR	ICS-103	Fine	23mm	4.0 - 5.5	4.5%	21	-	-	-				
5	M/M (P)	ICS-104	Fine	24mm	4.0 - 5.5	4%	23	-	-	-				
6	P/H/R (U) (SG)	ICS-202	Fine	27mm	3.5 - 4.9	4.5%	26	17997 (64000)	18250 (64900)	18278 (65000)	0	0	0	
7	M/M(P)/ SA/TL	ICS-105	Fine	26mm	3.0 - 3.4	4%	25	-	-					
8	P/H/R(U)	ICS-105	Fine	27mm	3.5 - 4.9	4%	26	18081 (64300)	18334 (65200)	18419 (65500)				
9	M/M(P)/ SA/TL/G	ICS-105	Fine	27mm	3.0 - 3.4	4%	25	-	-		L	L	L	
10	M/M(P)/ SA/TL	ICS-105	Fine	27mm	3.5 - 4.9	3.5%	26	-	-	-				
11	P/H/R(U)	ICS-105	Fine	28mm	3.5 - 4.9	4%	27	18334 (65200)	18587 (66100)	18587 (66100)				
12	M/M(P)	ICS-105	Fine	28mm	3.7 - 4.5	3.5%	27	-	-					
13	SA/TL/K	ICS-105	Fine	28mm	3.7 - 4.5	3.5%	27	-	-	-	Ι	Ι	Ι	
14	GUJ	ICS-105	Fine	28mm	3.7 - 4.5	3%	27	-	-	-				
15	R(L)	ICS-105	Fine	29mm	3.7 - 4.5	3.5%	28	17997 (64000)	18278 (65000)	18278 (65000)				
16	M/M(P)	ICS-105	Fine	29mm	3.7 - 4.5	3.5%	28	18559 (66000)	18840 (67000)	18840 (67000)	D	D	D	
17	SA/TL/K	ICS-105	Fine	29mm	3.7 - 4.5	3%	28	18615 (66200)	18897 (67200)	18897 (67200)				
18	GUJ	ICS-105	Fine	29mm	3.7 - 4.5	3%	28	18559 (66000)	18840 (67000)	18840 (67000)				
19	M/M(P)	ICS-105	Fine	30mm	3.7 - 4.5	3.5%	29	18700 (66500)	19065 (67800)	19065 (67800)				
20	SA/TL/K/O	ICS-105	Fine	30mm	3.7 - 4.5	3%	29	18784 (66800)	19150 (68100)	19150	А	А	А	
21	M/M(P)	ICS-105	Fine	31mm	3.7 - 4.5	3%	30	19065 (67800)	19346 (68800)	19346 (68800)				
22	SA/TL/ K / TN/O	ICS-105	Fine	31mm	3.7 - 4.5	3%	30	19206 (68300)	19487 (69300)	19487				
	SA/TL/K/ TN/O	ICS-106	Fine	32mm	3.5 - 4.2	3%	31	19909 (70800)	20106 (71500)	20106	Y	Y	Y	
	M/M(P)	ICS-107	Fine	34mm	2.8 - 3.7	4%	33	33181 (118000)	33181	33181				
25	K/TN	ICS-107	Fine	34mm	2.8 - 3.7	3.5%	34	33181 (118000)	33181	33181				
26	M/M(P)	ICS-107	Fine	35mm	2.8 - 3.7	4%	35	35150 (125000)	35150	35150				
27	K/TN	ICS-107	Fine	35mm	2.8 - 3.7	3.5%	35	35712 (127000)	35712	35712				

(Note: Figures in bracket indicate prices in Rs./Candy)