



OPTICAL ASSOCIATION OF INDIA

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05-Oct-2017

Sh. Shiv Pratap Shukla
Ministry of Finance
Govt. Of India
New Delhi,
mosfinance@nic.in

SUB: Rationalization of GST rates for Optical Industry

Dear Sir,

With due respect, faith and expectations towards the popular government of India under your benevolent leadership, we would like to draw your attention towards the unreasonable GST tax slabs for optical industry, which will affect the common citizen of India. Out of 130 crore population of India nearly 40% of the population require vision correction and nearly 80% of the population above age of 40years & this will increase exponentially when our young population will age. Data available on National Health Portal & National Program for Control of Blindness shows that refractive error as the second most common reason for the preventable blindness in India (Report attached).

We would like to draw your attention on the following points:

1) Spectacles (Present GST 12%): India has largest number of preventable blindness cases in the world and among that it is the most common problem is refractive error (ref: Data available on National Health Portal & National Program for Control of Blindness), which is treated by a pair of spectacles.

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Spectacles are not some fancy luxury devices but just like Hearing Aids (which is TAX free) they are very critical vision enhancement device required for normal vision & normal life. Poor vision can affect persons economic condition severely and learning abilities of our children. Hence we request you to kindly make spectacles Up to Rs 2000 at GST of 5%.

2) Spectacle Frames (Present GST 18%): Majority of India's population fall into Low to Mid income group for whom affordability is a major issue. Secondly frames have no use separately other than being sold as spectacles to the customers. Hence we demand that Spectacle Frames up to Rs 2000/- must be kept at 5% & above Rs2000 at 12%, just like in complete spectacles.

3) Sunglasses (28%): Every year India faces huge economic loss due to cataracts. The economic burden of blindness in India for the year 1997 is assumed to be Rs. 159 billion (US\$ 4.4 billion), and the cumulative loss over lifetime of the blind is Rs. 2,787 billion (US\$ 77.4 billion).

It has been scientifically proven that wearing UV protective sunglasses reduces the risk of the cataract development & macular degeneration by more than 50% (Ref attached: "SUNLIGHT AND AGE-RELATED EYE DISEASE" JOURNAL OF THE NATIONAL MEDICAL ASSOCIATION, VOL. 84, NO. 4). Dear Government please understand that sunglasses are not luxury items but a necessary protective device for Sun Protection to prevent the development of cataracts and macular degenerations in eye (Much more important than so many Prod-

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cts which are Tax Free). Hence we demand that the GST rate of tax on Sunglasses up to MRP Rs 2000/- must be 5%.

4) Spectacle Covers (28%): We strongly oppose the application of 28% GST on the basic consumable item like cases/covers which is mostly given free of cost to the customer for the simple use of protection of Spectacles. It is unfair to consider them as luxury. Hence in this regard we request you to at least reduce the GST tax slab Spectacle Covers/Cases up to Rs50/- as 5% only.

5) Contact Lens Solutions (28%): In present GST structure the contact lens which is the primary product is at 12% GST whereas contact lens solution which is a liquid to wear or remove these lenses is kept under 28% GST which is totally unjustified. Hence we demand to reduce the tax to 12% only, same as for contact lenses.

Summary:

Sr. No.	HSN CODE	NAME OF THE ITEM	Present G.S.T	Our Demand Up to Rs. 2000	Our Demand above Rs. 2000
1	9003	Spectacles	12%	5%	12%
2	9003	Spectacle Frames	18%	5%	12%
3	9004	Sunglasses	28%	5%	12%
4	4202	Spectacle Cases/ Covers	28%	Upto Rs. 50 5%	Above Rs. 50 12%
5	3307	Contact Lens Solutions & Lens Cleaner	28%	12%	N.A.



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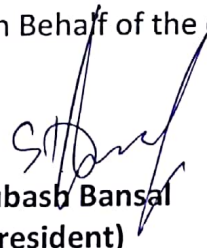
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Dear government maybe our predecessors of Optometrist & Opticians were not so quipped to draw your attention to these issues but now we want you to seriously look into these aspects in the view of healthy and happy India, which is we believe is also the vision of this Government.

All These devices are very important for vision correction hence in the public interest we seek your intervention in GST council to reconsider the present GST Tax rates for the products for Optometric & Optical practices.

On Behalf of the entire Industry!


Subash Bansal
(President)

Anand Maharwal
(Gen. Secretary)