

Kindly refer to my grievance letter No. DOCOM/E/2019/00509 dt 16-05-2019 submitted before you. I have received a reply from the Secretary, Rubber Board as per her letter No Secy/3/2019 dated 1st July 2019 which has been copied to the Under Secretary to Ministry of Commerce also. From the reading of the letter it appears that the Rubber Board vehemently attempting to justify the data provided in the table below which was provided along with letter number Secy/3/2019 dt 1st April 2019 addressed to me.

Updated key statistics published by the Board for 2004-05 to 2009-10 is furnished below.

Year	Opening Stock	Production	Import	Export	Consumption	Closing stock	Error	Error as % of consumption
2004-05	85190	749665	72835	46150	755405	110385	-4250	-0.56
2005-06	110385	802625	45285	73830	801110	93020	-9665	-1.21
2006-07	93020	852895	89799	56545	820305	165290	-6426	-0.78
2007-08	165290	825345	86394	60353	861455	164280	-9059	-1.05
2008-09	164280	864500	77762	46926	871720	196230	-8334	-0.96
2009-10	196230	831400	177130	25090	930565	211290	37815	4.06
Total	85190	4926430	549205	308894	5040560	211290	81	0.0016

Rubber Board has categorically accepted and admitted that total consumption in the Country which can be up to 5% error as communicated as per letter number Secy/3/2019 dt 6th March 2019. The following table shows that the error level in the statistics published has exceeded the accepted 5%. The figures shown in the following table are based on the updated key statistics published by the Rubber Board for 2011-12 to 2018-19.

Year	Opening stock	Production	Import	Export	Consumption	Closing Stock	Error	Error as % of Consumption
2011-12	288300	903700	214433	27145	964415	236275	178598	18.52
2012-13	236275	913700	262753	30594	972705	253000	156429	16.08
2013-14	253000	774000	360263	5398	981520	245000	155345	15.83
2014-15	245000	645000	442130	1002	1020910	252000	58218	5.70
2015-16	252000	562000	458374	865	994415	224000	53094	5.34
2016-17	224000	691000	426188	20920	1044075	264000	12193	1.17
2017-18	264000	694000	469760	5072	1112210	292000	18478	1.66
2018-19p	292000	648000	582381	4551	1211940	287000	18890	1.56
TOTAL	288300	5831400	3216282	95547	8302190	287000	651245	65.86

On examination of the data furnished by the Rubber Board to the Grievances raised by me it is seen that the Rubber Board is biased towards the importers where and it is not friendly with internal rubber growers or the Government exchequer. The above table depicts the formula adopted by the Rubber Board in arriving at the respective figures against each heading, ie. (Opening stock + Production + Import) - (Consumption + Export) = Closing stock. Unfortunately the figure “Error” was not reflected in the closing stock. It is a major anomaly which adversely affected rubber growers and foreign exchange - due to unwanted import and suppressed stock.

It is strange that the Rubber Board has communicated the following statement to pacify me, as per letter number Secy/3/2019 dt 1st July 2019.

“While examining the grievance, it seems that it is focussed on ‘equating both sides of the formula’ rather than focusing on how such key parameters conveniently serve and play a vital role in providing timely insight in determining the trend and development in the industry. This ‘difference in calculation using the formula’ is not the sole determinant in assessing how good an estimator is; it should be unbiased, consistent, sufficient, etc. Also it is not a sufficient evidence to conclude that the error/ ‘mathematical error’ in published figures are mere “against principles of Science and Arithmetics”.”

It may kindly be noted that in order to tally both sides, it is essential to add the so called “Excess / Deficiency’ along with closing stock. Updated key statistics published by the Rubber Board for 2011-12 to 2018-19 furnished below.

Year	Production	Import	Total Supply	export	Consumption	Total Demand	Excess / Deficiency	Stock at the end of the period
2011-12	903700	214433	1118133	27145	964415	991560	126573	236275
2012-13	913700	262753	1176453	30594	972705	1003299	173154	253000
2013-14	774000	360263	1134263	5398	981520	986918	147345	245000
2014-15	645000	442130	1087130	1002	1020910	1021912	65218	252000
2015-16	562000	458374	1020374	865	994415	995280	25094	224000
2016-17	691000	426188	1117188	20920	1044075	1064995	52193	264000
2017-18	694000	469760	1163760	5072	1112210	1117282	46478	292000
2018-19*	648000	582381	1230381	4551	1211940	1216491	13890	287000
TOTAL	5831400	3216282	9047682	95547	8302190	8397737	649945	287000

Really, subtracting total demand from total supply provides Excess / Deficiency which will necessarily reflect on balance stock. Unfortunately the same quantity is

missing and it will be a reason for economic loss to the Nation due to unaccountability **which ultimately led to unwanted import and erosion of precarious foregin exchange. This also adversely affected domestic rubber growers.**

In the circumstances I would request that an error free statistics tallying supply and demand sides reflecting the suppressed “Error” figures in the closing stock may be prepared and published so as to rectify incorrect data published from 2004-05 to 2018-19 by the Rubber Board.

Read More >> <https://bit.ly/irssummary>

Place: Thiruvananthapuram

Date: 03-07-2019

Address

Chandrasekharan Nair S

SANRA B2, Sreeraghav, Perukavu - PO

Thiruvananthapuram 695573

Mob: 09447183033