



मुख्य सीमाशुल्क आयुक्त कार्यालय, मुंबईअंचल-II
Office of the Chief Commissioner of Customs
Mumbai Customs Zone-II

जवाहरलाल नेहरू सीमाशुल्क भवन
JAWAHARLAL NEHRU CUSTOM HOUSE

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Date:13-08-2026

Record of Discussion of NAC-Chemicals with FAGs and Trade Associations held on 23.07.2026

1. A meeting of **NAC (Chemicals)** with concerned FAGs and Trade Associations was held on 23.07.2026 at **JNCH, Nhava Sheva**, under the chairmanship of the Convenor, NAC (Chemicals) and the Chief Commissioner of Customs, Mumbai Customs Zone-II, JNCH.
2. The Convenor urged all FAGs to sponsor suitable agenda points for discussion in NAC meetings.
3. A significant system issue related to additional qualifiers in hazardous cargo bills of entry caused processing delays. DG Systems reported deploying patches to resolve the problem for entries filed before and after July 7, 2026. However, some bills from mid-July remain stuck, requiring re-entry of qualifiers by importer or FAG officer.
4. Trade representatives expressed concerns about the impracticality of sampling very small quantities of lab chemicals imported for research and development. They requested that officers may be sensitized to such cases to avoid unnecessary delays and procedural complications. The Convenor advised the trade representatives to submit a detailed representation and assured that the matter will be examined.
5. The NAC Secretariat made a presentation on performance of FAGs during June 2026, covering key parameters such as Queries raised, First checks ordered, BEs pushed to PAG and Assessment time. It was observed that:
 - (i). the percentage Bills of Entry on which queries were raised declined from 23.49 % (May, 2026) to 21.68 % (June, 2026).
 - (ii). However, the overall percentage of BEs assessed under first check has increased slightly from 7.03 % (May, 2026) to 7.08 % (June, 2026).
 - (iii). Overall percentage of BEs pushed to PAG has also decreased slightly from

1.96 % (May, 2026) to 1.93 % (June, 2026).

(iv). Overall assessment time has decreased from 46.13 hours (May, 2026) to 40.27 hours (June, 2026).

6 . Clarifications were sought from specific FAGs where the parameters were found to be below the desired level and remedial measures were discussed. Illustratively:

(a) In case of Gr. 2, 2(A-B), Assessment time has significantly increased at Kandla Port, Nhava Sheva Port and Visakhapatnam Port. The convenor urged concerned Commissionerates to analyse the issue and to take necessary steps to reduce the assessment time.

[Action Owner: Visakhapatnam, Nhava Sheva and Kandla]

(b) The Convenor observed that, in the case of Chennai Sea FAG for Gr. 2(H-K), the percentage of queries raised has increased abnormally. A similar trend was observed at Chennai (Sea), Cochin and Nhava Sheva for Gr. 2(H-K) with regard to assessment time.

[Action Owner: Chennai Sea, Cochin and Nhava Sheva]

7. The agenda points sponsored by the stakeholders were thereafter taken up. A brief record of discussion, along with the action points arising therefrom, is placed as 'Annexure - I' (Old Agenda Points) and 'Annexure - II' (New Agenda Points). The list of attendees is placed at 'Annexure – A.

This issues with the approval of the Convenor, NAC Chemicals.

(Rajesh R Solanki)
Asstt.Commissioner of Customs
NAC-Chemicals Secretariat,
JNCH, Mumbai Zone-II.

Encl: Annexure-A, Annexure-I, Annexure-II.

Copy to:
Chief Commissioner's Office, Mumbai-II, JNCH.
All Members of Trade Interaction Meeting.
Office copy

Annexure-A

NAC Chemical Meeting with Trade & FAG Held on **23.07.2026** **List of Attendees**

The following officers of the department attended the meeting:

S. No	Name	Designation
1.	Ms. B. Sumidaa Devi	Commissioner of Customs, Nhava Sheva-I
2.	Dr. Parul Singhal	Secretary (NAC) & Joint Commissioner of Customs, Mumbai Zone-II
3.	Ms. Himani Dua	Joint Commissioner of Customs, Mumbai Customs Zone-II
4.	Shri. Pankaj Khandagale	Joint Commissioner of Customs, Mumbai Customs Zone-II
5.	Ms. Likhita V Umare	Dy. Commissioner of Customs, Mumbai Customs Zone-II
6.	Shri Rajkumar Mishra	Asst. Commissioner of Customs, Mumbai Zone-II
7.	Shri Ashesh Popatlal Patel	Asst. Commissioner of Customs, Mumbai Zone-II

FAG Members attending the meeting:

S.No.	Name	Designation
1.	Shri Dheeraj Rastogi	Pr. Commissioner of Customs, Delhi
2.	Shri Nasim Arshi	Pr. Commissioner of Customs, Kolkata
3.	Shri N. Naresh	Commissioner of Customs, Chennai Port
4.	Shri P Amaresh	Additional Commissioner of Customs, Vishakhapatnam
5.	Shri T Parry Vallal	Additional Commissioner of Customs, Bhubaneshwar
6.	Mr. Ravi Prakash	Additional Commissioner of Customs, Tughlakabad
7.	Mr. Navneet Kaushal	Additional commissioner of Customs, Noida

8.	Shri Deepak Zala	Additional Commissioner of Customs, Mundra
9	Mr. Parry Vallal	Additional Commissioner of Customs, Bhubaneswar
10.	Ms. Jayabharathi	Additional Director of Customs, NCTC
11.	Shri Abhay Lulu	Additional Director of Customs, NCTC
12.	Shri Bhoopanand Sharma	Additional Director of Customs, NCTC
13.	Shri Abhay Gupta	Additional Director of Customs, ICES
14.	Shri B Vinayak	Joint Commissioner of Customs, Tuticorin
15.	Shri. Raunaq Ansari	Joint Commissioner of Customs, Kolkata
16.	Dr. Saranya C	Joint Commissioner of Customs, Chennai Port
17.	Ms. Radhika Venugopalan	Joint Commissioner of Customs, Chennai Air Cargo
18.	Ms. Megha Bansal	Joint Commissioner of Customs, Delhi
19.	Ms. Himani Dhamija	Joint Commissioner of Customs, Mumbai-I
20.	Shri Sunil Kumar Srivastava	Joint Commissioner of Customs, Mumbai-III
21.	Shri LM Kalaiarasan	Deputy Commissioner of Customs, Tuticorin
22.	Shri Harrison Antony	Deputy Commissioner of Customs, Cochin
23.	Shri R. Jones Ferling Raja	Assistant Commissioner of Customs, Chennai Port
24.	Shri Murli Krishna	Assistant Commissioner of Customs, Vizag
25.	Bijaya Chandra Dash	Assistant Commissioner of Customs, Kolkata
26.	Shri Rahul Kumar	Assistant Commissioner of Customs, Delhi
27.	Shri M. R. Bhatt	Assistant Commissioner of Customs, Kandla
28.	Shri Sivanarayanarajan	Assistant Commissioner of Customs, Bengaluru ICD
29.	Ms. Jyoti Vichare More	Appraiser of Customs, Pune
30.	Shri Sumit Bhati	Appraiser of Customs, Delhi
31.	Shri Bhavesh Gohil	Superintendent of Customs, Kandla
32.	Shri Sunil Kumar	Appraiser of Customs, Kolkata

Representatives from Trade:

S. No	Name (Shri/Ms./Smt.)	Association
1.	Hiren Ruparel	BCBA
2.	Sudip Dey	FFFIA
3.	Dushyant Mulani	FFFAI
4.	Harsh Lapsia	AILBIEA
5.	Nimish Desai	WISA
6.	Divakaran Nair	CCBA
7.	Natarajan	
8.	Uday Kumar Oan	B.M. Logistics
9.	V. Minesh Raja	ACT Link Logistics Pvt Ltd.
10.	RN Sekar	CCBA
11.	Milan Desai	Ambika Shipping

OLD AGENDAPOINTS(ANNEXURE-I)

Sr. No.	Agenda Point	Sponsoring Association	Trade Comment	Record of Discussion	Action Owner
1	<u>Request for Inclusion of HS Code 38089361 in Anti-Dumping Duty Notification No. 17/2025-Customs (ADD) dated 19.06.2025 for Pretilachlor Technical:</u> Pretilachlor Technical is an insecticide/herbicide product which, as per the current ITC (HS) Classification Schedule, is specifically classified under HS Code 38089361. Accordingly, importers are required to declare and file Bills of Entry under HS Code 38089361 to ensure compliance with the ITC (HS) classification prescribed under the Foreign Trade Policy. However, it has been observed that HS Code 38089361 does not appear in the tariff classifications covered under the above Anti-Dumping Duty Notification, although Pretilachlor Technical itself is covered by the notification. Consequently, importers face a practical difficulty whereby the Bill of Entry is initially filed under HS Code 38089361 in accordance with the ITC (HS) Schedule, and thereafter an amendment is required to be carried out to another HS Code, such as 38089399, for the purpose of assessment and payment of Anti-Dumping Duty.	UPL Ltd.	No trade representative was present.	The Convenor acknowledged the issue raised and noted that it has been referred to TRU for appropriate action.	Closed

NEW AGENDA POINTS(ANNEXURE-II)

Sr. No.	Agenda Point	Sponsoring Association	Comments from Sponsoring Association	Record of Discussion	Action Owner
1.	Issues with Drug Controller NOCs and Test Report Accessibility Concerns were raised about delays in obtaining Drug Controller NOCs and the lack of system integration for test reports, which hampers trade efficiency and setting timelines for NOCs and enabling automatic sharing of test reports with importers and customs brokers through the system.	AILBIEA & BCBA	It was proposed to make system enhancements to allow automatic access to test reports for trade stakeholders.	The convener confirmed ongoing discussions with authorities in CCFC and further encouraged submission of proposals for system improvements for forwarding them to DG Systems.	AILBIEA & BCBA
2.	Issues in Additional Qualifier: Due to a system issue, the Bill of Entry does not move ahead in the system and throws an error stating that the Additional Qualifier has not been declared, even in cases where it has been declared correctly. This system-level error leads to unnecessary queries, adding to the processing burden on both trade and the Department without any corresponding compliance lapse.	Group 2(C-F), JNCH	Agreed to provide more information.	DG Systems reported deploying patches to resolve the problem for entries filed before and after July 7, 2026 however, trade representatives reported ongoing issues with entries from July 13-15 still pending assessment. Accordingly, DG/Systems advised that stuck entries require re-entry of qualifiers to proceed. Convenor further asked for specific examples for further examination.	Group 2(C-F), JNCH
3.	Non-Uploading of Critical Documents (e.g., CIB Certificate Amendments, MSDS): Customs Brokers/Importers are not uploading critical/mandatory documents such as CIB certificate amendments, MSDS (Material Safety Data Sheet), and other certificates at the time of filing the Bill of Entry, which leads to	Group 2(C-F), JNCH	Agreed to provide more information.	The Convenor asked for specific examples for further examination.	Group 2(C-F), JNCH

	avoidable queries being raised by FAG officers, resulting in delay in assessment and clearance. In cases involving regulated/hazardous/restricted goods (e.g., pesticides, chemicals), non-availability of MSDS or CIB amendment at the time of assessment creates compliance and safety-verification gaps.					
4.	Re-verification of defaced FTA certificates at ex-bonding stage: FFFAI submitted that certificates already defaced at the time of bonding are being questioned again at ex-bonding. Customs officials at bond and ex-bond stages are asking for re-validation despite prior defacement.	FFFAI		The trade requested for a resolution.	The Convenor responded that if a certificate has already been validated, it should not be re-questioned at ex-bonding, but requested specific examples/ illustrations from FFFAI to advise the concerned formations.	FFFAI
5.	Enable "View Report" functionality for trade on the DYCC test report module: The "View Report" interface already exists on ICES but is not enabled for trade. While email-based sharing (via BE number, date, email ID, and OTP) is a helpful interim step, direct online access would be far more efficient. Requested that the functionality be enabled for trade.	AILBIEA & BCBA		Reiterated that enabling the "View Report" functionality would be the best possible outcome for the entire trade.	The Convenor assured that the issue will be taken up with DG System regarding feasibility of making the test report available in importer/CB's dashboard.	NAC Secretariat
6.	Practical Difficulties in Assessment of Small-Quantity Imports Under Test Bond (TB): Assessment of Bills of Entry for import of precious metal colloids (HS Code 284310) under valid DGFT licence involves practical difficulties where consignments are of extremely small quantities (less than 100 grams, including quantities in grams and milligrams). Bills of Entry Nos. 9818461 dated 11.06.2026, 2438194 dated 10.07.2026, 2456079 dated 11.07.2026, and 2456070 dated	FFFAI		Suggested that the FAGs may be sensitized to refrain from ordering for testing for such small quantity imports which are for research and development purpose only.	Acknowledged the issue faced by the trade and assured that the matter will be examined in consultation with the concerned FAGs.	NAC Secretariat

	11.07.2026 have been assessed under Test Bond (TB) by the FAG officer, resulting in insistence on sample drawing before clearance. Due to the limited quantity imported, sample drawing substantially reduces or exhausts the usable quantity, causing avoidable hardship and delays. Further, repeated queries are being raised on issues already clarified in earlier Bills of Entry for similar imports, leading to prolonged assessment and duplication of efforts.				
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