



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: 17-08-2026

Record of Discussion of NAC-Chemicals with Industry
Associations held on 12.08.2026

A meeting of **NAC (Chemicals)** with concerned Industry Associations was held on 12.08.2026 at **JNCH, Nhava Sheva**, under the chairmanship of the Commissioner of Customs NAC (Chemicals), Mumbai Customs Zone-II, JNCH.

2. For this meeting, representatives from All India Associations, All India Chemical Associations, Officers from DG Systems were also invited.

3. The agenda points sponsored by the stakeholders were taken up. A brief record of discussion, along with actions need to be taken, is placed as '**Annexure - I**' (Old Agenda points), **Annexure -II** (New Agenda Points). The list of attendees is placed at '**Annexure – A**'.

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

SOLANKI

RAJESH RAMLAL

(Rajesh R. Solanki)
Asst. Commissioner, NAC(Chemicals)
JNCH, Nhava Sheva

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

Copy to:

1. Chief Commissioner's Office, Mumbai-II, JNCH.
2. All Members of Trade Interaction Meeting.
3. Office copy.

Annexure-A
NAC Chemical Meeting with Industry Associations
Held on 12.08.2026

List of Attendee

The following officers of the department attended the meeting:

S. No	Name	Designation
1.	Smt. B Sumidaa Devi	Commissioner of Customs, NAC Chemical, Mumbai Customs Zone-II
2.	Smt. Himani Dua	Secretary (NAC) & Joint Commissioner of Customs, Mumbai Customs Zone-II
3.	Shri Rajesh R Solanki	Asstt. Commissioner of Customs, NAC, Mumbai Customs Zone-II
4.	Shri Abhay Gupta	ADC, DG, Systems.
5.	Shri Arshdeep Singh	JC, CRC, NS-III, JNCH, Mumbai Customs Zone-II
6.	Shri Parampreet Rai	JC, Kolkata Customs
7.	Shri Mohit Khanna	Supdt., DG Systems

Representatives from Industry associations:

S. No	Name (Shri/Ms./Smt.)	Association
1.	Shri Manohar Maheshwari	Meghmani
2.	Ms. Pradnya Kulkarni	Lubrizol
3.	Ms. Archana More	Lubrizol
4.	Shri Sagar Kaushik	FAME
5.	Shri Shashank Mahana	Merck
6.	Shri Mr. Bhavya	BIC Chemicals
7.	Shri Het Patel	Everest Fertilizers
8.	Shri Yuvraj Chopra	BASF
9.	Shri Prerana Meher	CII
10.	Shri Jaimin Vasa	Gujarat Chemical Association

11.	Shri Vishal Thakur	FMC India Pvt. Ltd.
12.	Shri Suyog Yerekar	Indian Chemical Council
13.	Shri Mohammed Rizwan	Celanese
14.	Shri Mark S Fernandes	Sylvester India
15.	Shri Jatin	FICCI
16.	Ms Shriya	FICCI
17.	Shri Hemant Pandey	Syngenta
18.	Shri Shridhar Ladane	Syngenta

Old Agenda Points (Annexure-I)

Sr. No.	Agenda Point	Sponsoring Association	Trade Comments	Record of Discussion	Action Owner
1.	Voluntary Duty Payments – Timelines & System Issues: Digital interface for voluntary payments has some challenges. Challenges: system-generated errors are not descriptive, guidance for rectification is unavailable, and timelines for processing are unclear. This leads to delays and revenue leakages We have 2 cases of BOE re-assessment U/s. 18A wherein we have suo moto asked for re-assessment for payment of ADD while the BOE is pending from Nov 2025 for re-assessment. BOE No. 4335949 dated 06.09.2025 BOE No. 5086224 dated 14.10.2025 Both the BOE's has been approved in system, however re-assessment is still pending due to which the importer is at loss as interest burden is mounting each day.	Lubrizol	The trade stated that post their assessment application under Section 18A for voluntary payment of ADD it is still pending and currently the bill is pending for processing the refund and the same concern has been raised to ICEGATE. The trade also stated that under Section 18A there are two options when the officer has to process it such as i. Reassessment ii. Reassessment with refund, and claimed that the second option was approved by the department.	The Commissioner (NAC) acknowledged that this is a system related issue. Inputs were taken from JC/CRC/JNCH, who informed that refund for the said BsOE was not pending at their end. DG Systems suggested that the importer refile with Zero refund and suggested to handhold the importer in the process wherever needed.	DG Systems, Lubrizol The importer's email ID has been shared with DG System to facilitate a meeting between the importer and DG Systems. Closed
2.	Query regarding ADC NOC: Query is being raised regarding ADC NOC despite the product not being dual use	Fine Organics	No representatives were present during the meeting.	No representatives were present during the meeting.	Closed

3.	Denial of request for reassessment of BOE after issuance of summons by DRI: The party submitted that they imported 111,000 kgs of Mono Isopropyl Amine vide BE No. 9342893 dated 18.05.2026. At the time of self-assessment, assessment by the officer, and duty payment on 19.05.2026, no anti-dumping duty was leviable, as ADD Notification No. 08/2026-Customs (ADD) was issued only on 22.05.2026. OCC was granted on 27.05.2026. Upon learning of the non-levy through DRI summons, the party submitted a request on 16.06.2026 to the jurisdictional Deputy Commissioner for reassessment and payment of the applicable ADD with IGST and interest. The same has not been permitted. The party requests that reassessment be allowed at the earliest.	Meghmani Dyes	The importer filed the Bill of Entry, completed assessment, and paid the applicable customs duty before the issuance of Notification No. 08/2026-Customs (ADD) dated 22.05.2026 imposing Anti-Dumping Duty (ADD) on Mono Isopropyl Amine. After receiving a DRI summons regarding the non-levy of ADD, the importer voluntarily requested reassessment of the Bill of Entry to pay the applicable ADD, along with IGST and interest. However, reassessment has not been permitted, and the importer has requested early approval to enable payment of the applicable dues.	Importer said that as duty is already paid, it is kindly requested to please reassess the said BoE and appropriate the said payment made by Challan, so that IGST so paid can reflect on the GSTN portal.” Importer paid ADD vide challan dated 27.07.2026 He was informed that as per Para 5(a) of Section 18A of C.A. '62; <i>“No revision of entry shall be made under this section in the following cases, namely:--</i> <i>(a) cases where any audit under Chapter XIIA or search, seizure or summons under Chapter XIII has been initiated and intimated to the importer or the exporter concerned;”</i>	Meghmani Dyes Sponsor was requested to submit a detailed representation for referring the matter to CBIC for policy-level consideration
4.	Arbitrary Stoppage of Export of Bulk Chemicals like Hydrochloric Acid by Customs: The party submitted that Customs has stopped exports of Hydrochloric Acid and Sulphuric Acid based on CMD Alert No.	BIC Chemicals & Packagings Pvt. Ltd.	No representatives were present during the meeting.	Representation has also been received from Basic Chemicals, Cosmetics & Dyes Export Promotion Council(CHEMEXCIL). Issue pertains to Export	Closed

	03/2026, which only provides a voluntary compliance mechanism and does not mandate an NOC. Despite this, Customs insists on NOC before allowing exports. No prior intimation was given to trade. India exports 5,000–8,000 MT of Hydrochloric Acid and 4,000 MT of Sulphuric Acid monthly — all now halted — causing heavy losses. The party requests that exports be allowed with end-user declarations as per the CMD alert, or on the basis of NOC application emails.			of Goods, forwarded to Commissioner NS-2 and the same was informed to CHEMEXCIL	
5.	Examination of consignments under CTH 4801 (Newsprint)-reg. Clarification regarding the applicability of DRI Alert Circular No. 19/2015 to genuine actual-user newsprint importers (including AEO Tier-1 entities) and examination practices affecting Direct Port Delivery (DPD), with a view to addressing delays and additional logistics costs arising from frequent physical examination of consignments.	M/s ABP Pvt Ltd	It was clarified that DRI Alert Circular No. 19/2015 is intended to address cases involving traders and misuse of eligibility conditions for newsprint imports, and is not applicable to genuine actual-user importers holding valid registration with the Registrar of Newspapers for India (RNI). The importer, an AEO Tier-1 status holder and a major newsprint importer through Kolkata and Haldia Ports, has represented that around 95% of its consignments were subjected to physical examination over the last six months, resulting in denial of Direct Port Delivery (DPD) and additional	JC/Kolkata Customs assured that Officers will be sensitized to apply the provisions of the DRI Alert in accordance with the clarification issued by the NAC on 07.05.2026.	Closed

			logistics costs, including CFS handling and container detention charges.		
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NEW AGENDA POINTS (ANNEXURE-II)

Sr. No.	Agenda Point	Sponsoring Association	Trade Comments	Record of Discussion	Action Owner
1.	Change in name of the Manufacturer/Source company: In normal business operations, companies do change the legal name of manufacturer for differentiation, re-branding or restructuring etc. The changed name of the manufacturer gets reflected in the commercial invoices and other import-related documents. An example is Change of name of manufacturer from ABC Corporation to ABC Agricultural Solutions Corporation. It may be noted that a change in the manufacturer's name is purely administrative in nature (it has no impact on the quality, safety and bio-efficacy of a crop protection product). However, endorsement of such changes on the	CropLife India, BASF	If the manufacturer's name appearing on the invoice does not match with that mentioned in the Registration Certificate issued by the Central Insecticides Board & Registration Committee (CIB&RC), 1) the matter may kindly be brought immediately to the attention of the Secretary, CIB&RC (cibsecy@nic.in), with a copy marked to the company representative, so that it could be quickly resolved. 2) We also respectfully request Customs authorities to kindly permit clearance of such consignments (where the manufacturer's name appearing on the invoice differs from that on the Registration Certificate solely on account of a pending name-change endorsement) based on the	Commissioner(NAC) deferred the agenda point to be taken up in the next meeting as the Convenor was unavailable for discussion.	CropLife India, BASF

	Registration Certificate of the crop protection products is subject to the processing timelines of CIB&RC and may take due time to be issued. Any delay in updating the Registration Certificate could potentially impact imports, particularly considering the seasonal demand and usage patterns of the products concerned.		importer's declaration regarding the change of name, along with documentary evidence demonstrating that an application for endorsement of the name change has been duly submitted to CIB&RC and is under their consideration. This approach would help minimize the risk of delays in customs clearance and help in avoiding potential of disruption in legitimate trade while the administrative process for updating the Registration Certificate is being completed.		
2	Issue of permissible tolerance limits. We are frequently receiving deficiency from Custom Authorities regarding mismatches between the A.I. loading in the product and the values reported in the CoA. However, CIBRC has already issued a notification to CBIC	CropLife India, Syngenta	Queries regarding A.I. loading are being raised arbitrarily by the field formations.	The sponsor requested to train the field officers on the Notification issued by CIB,RC Commissioner(NAC) asked the sponsor to suggest a schedule for training the field officers.	CropLife India, Syngenta

	(attached), Customs authorities regarding the permissible tolerance limits.				
3.	Customs is raising queries on these Export Permits Customs raise queries frequently regarding the Export Permit recently introduced by CIBRC. Under the newly introduced provision, Export Permits are being granted for the export of materials overseas in attached format. However, Customs is raising queries on these Export Permits and want clarification from CIBRC, which causes delay in sending samples to overseas importers.	CropLife India, Syngenta	Queries being raised by field formations is causing unnecessary delay in clearance.	Issue pertains to Export of Goods, forwarded to Commissioner, NS-II and the same was informed to CropLife India	Closed