



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: 07-04-2026

**Record of Discussion of NAC-Chemicals with Industry
Associations held on 11.03.2026**

A meeting of **NAC (Chemicals)** with concerned Industry Associations was held on 11.03.2026 **at JNCH, Nhava Sheva**, under the chairmanship of the Pr. Commissioner of Customs, NS-I, NAC Chemicals, Mumbai Customs Zone-II, JNCH.

2. 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). The list of attendees is placed at '**Annexure – A**'.

This issues with the approval of the Convener, NAC-Chemicals, JNCH, Mumbai Customs Zone-II.

(Likhita V Umare)
Dy. Commissioner, NAC(Chemicals)
JNCH, Nhava Sheva

Encl: Annexure-I, 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 Chemicals Meeting with Industry Associations
Held on 11.03.2026
List of Attendees

The following officers of the department attended the meeting:

Sr. No.	Name	Designation
1	Shri. Yashodhan A. Wanage	Pr. Commissioner of Customs, Nhava Sheva-I
2	Shri. K Mahipal Chandra	Additional Commissioner Of Customs, Nhava Sheva-I
3	Ms. Parul Singhal	Joint Commissioner Of Customs, Nhava Sheva-I
4	Ms. Likhita V Umare	Dy. Commissioner of Customs, Nhava Sheva-I

Representatives from Associations:

Sr. No.	Name	Association
1	Mr. Amit Shah	Corteva Agriscience India Pvt. Ltd.
2	Ms. Shantwana Dixit	CCFI
3	Mr. Harish Mehta	
4.	Ms. Nirmala Pathrawal	
5.	Mr. Manohar Maheshwari	PMFAI/Meghmani
6.	Mr. Jatin Jain	FICCI
7.	Mr. Rajiv Kapoor	FMC Corp/FICCI
8.	Ms. Hema Jayakumar	Fine Organics
9.	Mr. Kuldeep Sawant	

10.	Mr. Rohit	AMAI
11.	Mr. Jitin Sadhana	Dhanuka Agritech Ltd
12.	Ms. Ramya Shivam Goel	
13.	Mr. Sanjay Kher	SME Chamber of India
14.	Mr. Shridhar Ladane	Syngenta

OLD AGENDA POINTS (ANNEXURE-I)					
Sr. No.	Agenda Point	Sponsoring Association	Trade Comments	Record of Discussion	Action
1	Chinese goods diverted through Thailand: Rules of Origin to be verified by Customs Authorities as goods of Chinese origin are routed through Thailand under the ASEAN FTA. The referred goods are <u>Phenolic resins</u> under chapter 38 which are also coming under chapter 39.	Confederation of Indian Industry (CII)	No representative was present during the meeting.	No representative was present in the meeting. In the previous meetings, the sponsoring body was requested to make a written submission explaining the reason to believe that the goods of Chinese origin were diverted through Thailand, so as to enable customs to take necessary action. No such written submission received.	Closed
2	Disparity in classification of Antioxidants 6PPD: Some custom houses classify it under chapter 38, while some classify it under chapter 29.	J.K.Tyres	No representative was present during the meeting.	No representative of the sponsoring industry was present in the past few meetings, therefore the matter is closed.	Closed
3	Mandatory testing of agrochemicals: Imports of agrochemicals are increasing, through all ports by traders without proper testing. Surplus goods are coming in. There is no check especially w.r.t consignments from China and USA	CCFI	Three issues were raised : 1. Significant increase in agrochemical imports, particularly from China and the United States, adversely impacting domestic manufacturers. Trade has suggested imposing higher duties. 2. Absence of adequate testing mechanisms at ports for imported agrochemical consignments. 3. Possible rerouting of Chinese-origin agrochemicals through third countries (e.g., Thailand, Hong Kong, Singapore) via high-seas sales and document changes, making origin verification difficult.	1. Pr. Commr, NS-I stated that to address the issue of duty, a letter dated 27.01.2026 has been forwarded to JS, TRU. 2. Regarding the allegation that imports were being routed through ASEAN countries to misuse the ASEAN Free Trade Agreement (FTA), Pr. Commr, NS-I also informed that an analysis of one year of import data at Nhava Sheva showed that the concerned molecules were mainly imported from China, Japan, and a few European countries, with no evidence of imports being routed through ASEAN countries. It was requested to submit specific information regarding other ports for further examination.	Closed
4	Regularisation of Advance License for shortfall in export obligation: This can be done with payment of duties and IGST payment and credit issue. Department denying reassessment of BoE, only method to pay IGST and avail the credit. Need the clarifications.	PMFAI/Meghmani Dyes	Two main issues were highlighted: 1. Refund of interest and penalty paid along with IGST under the pre-import condition of Advance Authorisation is being sought following the Mahindra & Mahindra judgment; however, reassessment of the Bill of Entry required for claiming the refund is not being permitted. 2. The Association has also pressed on the issue that they are able to get reassessment done in other ports but not in Nhava Sheva. 3. The issue is related with regularisation of shortfall in export obligation. Mundra customs has denied reassessment of BE.	1. Pr. Commr, NS-I stated that the matter related to the A R Sulphonates judgment has been challenged through an SLP, and clarification has been sought from the Board. It was further informed that a written communication regarding the department's position has already been issued to the affected party. 2. The association was asked to submit copies of refund orders issued by other ports. 3. On the issue of not allowing reassessment at Mundra port in cases of shortfall in export obligation, comments were sought from the concerned Customs House, and the same are under examination in NAC Secretariat.	PMFAI & NAC Chemicals Secretariat

5	<u>Classification of Formic Acid</u> : Formic Acid is regularly being classified under chapter 29 but some customs formations insist on classification under chapter 38 as it being 85 % solution.	Kajay Remedies Pvt. Ltd. (FISME)	No representative was present during the meeting.	No representative was present. The matter was examined in NAC Secretariat. As per Chapter note 1(d) of chapter 29, separate chemically defined organic compounds, when dissolved in water, fall under Chapter 29.	Closed
6	<u>Misdeclaration in Imports</u> : Final products are being imported by mis-labelling them as intermediates	FMC Corp (FICCI)	Concerns were raised regarding misdeclaration of imported chemicals, with suggestions to increase scrutiny of trader imports, introduce sampling for such consignments, and mandate declaration of CAS number and IUPAC name in the Bill of Entry.	1. Where IUPAC and CAS number is not available with the importer for certain categories of chemicals, a declaration of non-availability may be given in the BE as per Circular 23/2023 dated 30.09.2023. 2. Pr. Commr, NS-I asked for specific suspected instances where such misdeclaration is occurring.	FMC Corp (FICCI)
7	<u>Classification of Formulation Imported from Malaysia</u> : The product is classified as fertilizer under Chapter 31 in Malaysia, but in India it will be used as a plantation formulation (rubber/coffee) and does not meet FCO nutrient criteria (N/P/K).	Kajay Remedies Pvt. Ltd. (FISME)	No representative was present during the meeting.	Since the brochure provided by the sponsoring authority did not contain the constituents, classification of the goods could not be examined. However, they may approach CAAR for resolution.	Closed.