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**
पोस्ट :शेवा, तालुका :उरण,जिलारायगढ़,महाराष्ट्र-400707
Post: Sheva, Taluka: Uran, District: Raigad, Maharashtra400707
दूरभाष/Tel No.: 022-27244736 फ़ैक्स/Fax 27242402-022:
Email: ccu-cusmum2@nic.in/nacchemical.jnch@gov.in

Date:22-06-2026

## Record of Discussion of NAC-Chemicals with Industry Associations held on 10.06.2026

A meeting of NAC (Chemicals) with concerned Industry Associations was held on 10.06.2026 at JNCH, Nhava Sheva, under the chairmanship of the Convenor, NAC-Chemicals, Chief Commissioner of Customs, Mumbai Customs Zone-II, JNCH.

2. The agenda points sponsored by the stakeholders were taken up. A brief record of discussion, along with actions to be taken, 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.

Digitally signed by
Likhita Vijay Umare
Date: 22-06-2026
15:47:12

(Likhita V Umare)
Dy. 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 InteractionMeeting.
3. Office copy.

# Annexure-A

# NAC Chemical Meeting with Industry Associations Held on 10.06.2026

## List of Attendee

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. | Shri K Mahipal Chandra | Secretary (NAC) & Additional Commissioner of Customs, Mumbai Customs Zone-II |
| 3. | Shri Amit Kumar Mishra | Additional Commissioner of Customs, Mundra |
| 4. | Dr. Parul Singhal | Joint Commissioner of Customs, Mumbai Zone-II |

**Representatives from Industry associations:**

| S. No | Name (Shri/Ms./Smt.) | Association |
|---|---|---|
| 1. | Sahdev Warang | Indian Chemical Counsil (ICC) |
| 2. | Suyog Yerekar | |
| 3. | Arjun Hindocha | Asian Paints |
| 4. | Jigar Shah | DOW Chemicals |
| 5. | Selvanayagi | Federation of Indian Export Organizations (FIEO) |
| 6. | Jitin Sadana | Dhanuka Agritech Limited |
| 7. | Shashank Mahana | Merck Life Science Private Limited |
| 8. | Jaimin Vasa | Gujarat Chemical Association |
| 9. | Shalini Basu | CHEMEXCIL |
| 10. | Sagar Kaushik | Federation of Agri-Value Chain, Manufacturers & Exporter (FAME) |
| 11. | Vijay Vora | Lubrizol |
| 12. | Pallavi | |

| | | |
|---|---|---|
| 13. | Pradnya Kulkarni | |
| 14. | Harish Mehta | CCFI |
| 15. | Nirmala Pathrawal | |
| 16. | Manohar Maheshwari | PMFAI/Meghmani |
| 17. | Vincent Dmello | UPL ltd. |
| 18. | Uday Chand | All India Plastics Manufactures Association |
| 19. | Pramod Sabat | Galaxy Surfactants |

| OLD AGENDA POINTS (ANNEXURE-I) | | | | | |
|---|---|---|---|---|---|
| **Sr. No.** | **Agenda Point** | **Sponsoring Association** | **Trade Comments** | **Record of Discussion** | **Action Owner** |
| 1 | **Regularisation of Advance License for shortfall in export obligation:**<br><br>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 clarification. | PMFAI/ Meghmani Dyes | 1. The Association stated that duty should be payable only on the unfulfilled portion and not on the entire authorization. He highlighted that Mundra Customs has been rejecting requests for reassessment of Bills of Entry, unlike other Customs jurisdictions where such reassessments are permitted. He further emphasized that reassessment is necessary for the IGST paid to be reflected on the GST portal, enabling availment of input tax credit. | The matter appears to be a port-specific and discussions had already been held with the concerned Commissionerate. The industry representative was advised to approach concerned Customs formation, and it was assured that appropriate directions would be issued to the port. | Closed |
| 2 | **Misdeclaration in import of agrochemicals leading to revenue and regulatory concerns:**<br><br>It has been observed that agrochemicals are being imported into India, particularly from third countries such as China, with instances of misdeclaration in classification. Products that are appropriately classifiable under Chapter 38 are reportedly being declared under Chapter 29, resulting in potential evasion of applicable duties and regulatory controls. | National Council on Chemicals of Assochem | No representatives were present during the meeting. In the alst meeting, the sponsoring association brought to the notice the port restriction envisaged in Rule 45 of the Insecticides Rules. | Notification GSR 79(E) dated 27.01.2017 notified several authorized ports, including most major seaports and airports for import of insecticides.<br><br>The sponsoring association was requested to provide specific instances of insecticide imports through non-notified ports for further examination. | National Council on Chemicals of Assochem |
| 3 | **Delay in Refund of Anti-Dumping Duty:** | Asian Paints | Industry representative sought clarification whether Customs | No such information/ intimation available with JNCH | Closed |

| | | | | | |
|---|---|---|---|---|---|
| | Despite the High Court direction in September 2025 for refund of anti-dumping duty on titanium dioxide, the process is taking considerable time, with Bills of Entry not being reassessed. Expedited action may be considered to facilitate timely refunds for importers. | | import statistics may no longer be available in the public domain from 1 March. He stated that industry uses such data to monitor import trends and reconcile import movements, including comparison of export data from China with Customs clearance information in India. | | |
| 4 | **Issues in Duty Payment and IGST Credit on Excess Imports:** In cases of excess quantity imports, there is no clear system-based mechanism for payment of duty & reassessment of BE. Duty paid through e-challan is not getting reflected in GSTN, resulting in non-availability of IGST credit in cases of Regularization of Advance Authorization imports. | Supreme Petrochem Limited | No representatives were present during the meeting. | NA | NAC Secretariat |
| 5 | **Reassessment of BE due to system related issue:** When BE is filed w.r.t. CTH 38237020 along with CVD, the CVD is not levied in the final version of BE. | Galaxy Surfactants | Industry highlighted a system issue wherein CVD duty details do not reflect at the time of initial Bill of Entry filing, necessitating recall and reassessment for every consignment. The representative offered to share screenshots evidencing the issue. | The matter would be referred to DG Systems for examination and resolution. The representative was requested to provide screenshots to support the reference. | Galaxy Surfactants and NAC Secretariat |
| 6 | **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. | NA | NAC Secretariat |
| 7 | **Request to release of Bond and Bank Guarantee** | Dow Chemicals | Dow Chemical raised the issue of pending finalization of Bills of Entry involving third-party invoicing under AIFTA Certificates of Origin. He noted that the matter pertains to imports from April 2024 to February 2025 and that no feedback had yet been received. | The matter is under examination and the representative samples of Certificates of Origin, covering the same supplier and country combinations, have been sought instead of all certificates. Further action is underway. | NAC Secretariat |

| NEW AGENDA POINTS (ANNEXURE-II) | | | | | |
|---|---|---|---|---|---|
| **Sr. No.** | **Agenda Point** | **Sponsoring Association** | **Trade Comments** | **Record of Discussion** | **Action Owner** |
| 1. | **Customs Notification –No. 12/2026–Customs:**<br>There is ambiguity in interpretation where a single product description is mapped to multiple HS codes.<br>For example, Sr. No.19 or 20 or 39 etc. in Sr. No. 19 description reads as ("Polypropylene"), three HS codes are mapped: 3902 10 00; 3902 30 00; 3902 90 00 ("Other" category).<br>It is unclear whether exemption applies to all listed HS codes or only where the product strictly aligns with both the specific HS code and product description.<br>This creates uncertainty for products under residual "Other" categories, leading to inconsistent assessment, potential audit exposure, or revenue leakage. | Lubrizol | The trade is asking for clarity specifically for the category of "other" along with description. | The matter was discussed in detail for each of the three examples cited in the representation. The issue was further examined in the NAC Secretariat and no ambiguity was noticed. The intention is to exempt only when both the description and the CTH match with those given in notification. | Closed |
| 2. | **Voluntary Duty Payments – Timelines & System Issues:**<br>Digital interface for voluntary payments has some challenges.<br>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<br><br>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.<br>BOE No. 4335949 dated 06.09.2025<br>BOE No. 5086224 dated 14.10.2025<br><br>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 has applied for Section 18A assessment for voluntary payment of ADD however they had received an update that this application has been processed as a refund and department has granted refund on the same. Trade is asking for clarity in this matter. | The issue will be examined for resolution. | NAC Secretariat |

| | | | | | |
|---|---|---|---|---|---|
| 3. | **<u>PN_08 dated 12.05.2026 issued by Zone-III Commissionerate in regard to payments not realized up to 31.03.2025 against sanction of DBK:</u>**<br>The PN only specifies the list of exporters and the pending number of shipping bills for each year, however the details of shipping bills and value for each exporter for the relevant years starting from 2015-16 are missing which leads to un-necessary delay in providing feedback and relevant data/information. | Lubrizol | The PN specifically does not support them where they can see only the number of shipping bills but no visibility about the particular bill.<br>In majority of the bills the value is ranging between 1-5 dollars where no drawback has been claimed. | The issue is out of the mandate of NAC-Chemicals and the same should be taken up with Mumbai Customs Zone-III. | Closed |
| 4. | **<u>Significant surge in agrochemical imports:</u>**<br>There has been a surge in imports of agrochemicals, presently at Rs. 13,998 Cr. Therefore, there is imperative need to enhance the Custom duty to safeguard indigenous manufacturers and focus on Make in India towards Atmanirbhar Bharat.<br><br>Imposition of 30% custom duty on all formulation (ready to use finished goods) imports from China and elsewhere, and 20% custom duty on import of all Technical grades (basic raw material for formulation)<br>**OR**<br>a delta of 10% between the two with higher duty on formulations. | Crop Care Federation of India | Trade has stated contention of revision of customs duty to encourage Make in India. There is a 50% raise in the last 5 years in import from Asian Countries. They requested the issue to be deliberated with the concerned ministries. | The point raised has already been deliberated in detail in previous meetings and a reference has also been made to Board forwarding the request. A reminder would be issued.<br><br>Trade needs to approach the other concerned ministries. | Closed |