



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:17-02-2026

Record of Discussion of NAC-Chemicals with Industry
Associations held on 11.02.2026

A meeting of NAC (Chemicals) with concerned Industry Associations was held on 11.02.2026 at JNCH, Nhava Sheva, under chairmanship of the Convenor, NAC (Chemicals) and Chief Commissioner of Customs, Mumbai Customs Zone-II, JNCH.

2. The open agenda points of previous meetings were taken up for discussion. There were no new agenda points sponsored by the stakeholders. A brief record of discussion, along with action 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 Convenor, NAC Chemicals.

(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 Chemical Meeting with Industry Associations
Held on 11.02.2026

List of Attendee

The following officers of the department attended the meeting:

S. No	Name	Designation
1.	Shri. Yashodhan A. Wanage	Pr. Commissioner of Customs, Nhava Sheva-I
2.	Ms. Likhita V Umare	Dy. Commissioner of Customs, Mumbai Customs Zone-II

Representatives from Industry associations:

S. No	Name (Shri/Ms./Smt.)	Association
1.	Vincent Dmello	UPL Ltd.
2.	Manohar Maheshwari	PMFAI/Meghmani Dyes
3.	Jatin Jain	Federation of Indian Chambers of Commerce & Industry (FICCI)
4.	Dr. Amrita Roy	Indian Rubber Materials Research Institute IRMRI
5.	Raju Kapoor	FMC Corp./FICCI
6.	Sahdev Warang	Indian Chemical Council (ICC)
7.	Ajay Saboo	Kajay Remedies Pvt. Ltd., Thane (Federation of Indian Micro and Small & Medium Enterprises (FISME))
8.	Jigar Shah	Dow Chemicals
9.	Manisha Karale	Regulatory Representatives and Managers Association (RRMA)
10.	Nirmala Pathrawal	Crop Care Federation of India (CCFI)
11.	Harish Mehta	
12.	Kuldeep Sawant	Fine Organics
13.	Hema Jayakumar	

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.	The representation sent by CII was examined. No representative was present during the meeting, however, a detailed representation incorporating details, such as 8 digit classifications of the goods, description of the goods being diverted along with details of suppliers (if available), reasons to believe that no value was added in the ASEAN country, is required to further analyse the issue. Further, in order to seek suitable trade remedy, Directorate General of Trade Remedies maybe approached.	Confederation of Indian Industry (CII)
2	Resistance on the part of CFS to send containers of Hazardous goods for Scanning to CSD: B/E filed in advance are RMS facilitated, but in the event of amendment in BL, it goes for examination. The material being hazardous in nature consignment cannot be opened, for examination. As per Public Notice issued in JNCH containers of hazardous in nature should go in for scanning but there is resistance from CFS to send the container for scanning so it is very difficult when order comes for 100% open and examination. Hence some facility should be made available to get rid of this as doing this entails additional costs.	UPL Ltd.		Public Notice regarding examination of hazardous goods has been amended and Public Notice-20/2026 dated 04.02.2026, JNCH has been issued in this regard.	Closed
3	Exclusion of samples of Molecules imported in developmental stage from Licensing by CIBRC: Samples of molecules come into India for renovation and upgradation. As these samples are in developmental stage they cannot be submitted for licensing. CIBRC had conveyed to them that they do not know the development stage of these molecules, hence they cannot issue import permit for this. CIBRC told them to discuss with customs and get their views on this.	Syngenta India Pvt. Ltd.	No representative was present during the meeting.	Representation from sponsoring association was examined. However, Customs has no mandate to overrule the import permit requirement, where prescribed by the line ministry. Therefore, the issue to be taken up with line ministry by the sponsoring association.	Closed
4	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.	The particulars of the concerned Customs Houses and importers, where diverse practices were noticed, are sought from J.K. Tyres. The matter of classification is to be further referred to the Working group on classification, FAG-Kolkata, to examine the issue.	NAC Chemicals and JK Tyres

5	Classification of certain chemicals under Ch 38 and Ch 29: Generally, the Agrochemical products are classified under Chapter 38 and imports are subject to CIB registration. In the recent Budget 2025, many similar products of technical are also classified under chapter 29 for non-insecticidal usage. However, there is no such clarity either under customs or FTP provision that chapter 29 should be used only for imports of product for non-insecticidal usage and therefore, the same can be misused, due to duty differential. Further, all such items under Chapter 29 should also be made subject to CIB registration, as any item registered under Insecticide Act, requires registration for imports.	Pesticide Manufacturers and Formulators Association of India (PMFAI)	We have already submitted the proposal and further response is awaited.	A reference in the matter has already been referred to JS Customs <i>vide</i> letter dated 29.01.2026 and the matter is being actively pursued.	Closed
6	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	Two main issues were raised : 1. List of molecules which are being imported needs to be investigated. 2. Source of origin for import of these molecules. These molecules are mainly exported from China and imported in India under wrong HSN Code and country of origin is shown Thailand, Hong Kong, Singapore etc. through high sea sales. Further these molecules are in two forms Technical and ready-made formulations. Further, it was stated that currently there is no duty difference in imports of technicals and readymade formulations. There should be difference of atleast 10 percent between imports of technical and readymade formulations.	1. Regarding the issue of duty, a letter dated 27.01.2026 has been forwarded to JS, TRU. 2. Regarding the import of molecules from third country, the matter will be examined.	NAC Chemicals
7	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. The issue is related with pre-import conditions where assessment is done and interest and penalty were paid. However, when refund application for the interest and penalty is submitted in light of Mahindra decision being upheld by Supreme court, importers are being directed to go for re-assessment of BE. Re-assessment of BE is also being denied. 2. The issue is related with regularisation of shortfall in export obligation. Mundra customs has denied reassessment of BE.	1. A clarification has been sought from the Board in this matter. The issue will be examined by concerned Commissionerate. 2. The matter will be referred to the Commissioner, Mundra to seek comments.	NAC Chemicals
8	Classification of Formic Acid : 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)	A detailed note along with relevant documents has been submitted on the issue. It was requested to issue a trade notice in this regard as this product naturally comes as an 85% solution.	Representation regarding the issue has been received on 11.02.2026 and the same will be examined.	NAC Chemicals

9	Misdeclaration in Imports: Final products are being imported by mis-labelling them as intermediates	FMC Corp (FICCI)	No representative was present during the meeting.	Specific instances with further details (e.g. name of goods in question, country of export, specific supplier if any etc.) pending from Sponsoring Association	FMC Corp (FICCI)
10	Classification of Formulation Imported from Malaysia: 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)	The formulation would fall under the category of biostimulants or plant growth regulators (PGR). A copy of classifications done under PGR has been mailed. In India the same are classified under Chapter 38.	Representation regarding the issue has been received on 11.02.2026 and the same will be examined. Importer may also seek Advance Ruling from the AR Authority for greater certainty.	NAC Chemicals and Kajay Remedies Pvt. Ltd.