मुख्य सीमाशुल्क आयुक्त कार्यालय, मुंबईअंचल-II
Office of the Chief Commissioner of Customs
Mumbai Customs Zone-II
जवाहरलाल नेहरू सीमाशुल्क भवन
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Date:27-04-2026

Record of Discussion of NAC-Chemicals with Industry Associations held on 13.04.2026

A meeting of NAC (Chemicals) with concerned Industry Associations was held on 13.04.2026 at JNCH, Nhava Sheva, under the chairmanship of the Convenor, NAC (Chemicals) and 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) & 'Annexure-II' (New Agenda points). The list of attendees is placed at 'Annexure-A'.

This issues with the approval of the Convener, NAC-Chemicals.

Yours faithfully,

Digitally signed by
Likhita Vijay Umare
Date: 27-04-2026
17:27:36

(Likhita V. Umare)
Dy. Commissioner of Customs
NAC-Chemicals Secretariat,
JNCH, Mumbai Zone-II.

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 13.04.2026

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.	Shri K Mahipal Chandra	Secretary (NAC) & Additional Commissioner of Customs, Mumbai Customs Zone-II
3.	Ms. Likhita V Umare	Dy. Commissioner of Customs, Mumbai Customs Zone-II

Representatives from Industry associations:

S. No	Name (Shri/Ms./Smt.)	Association
1.	Jatin Jain	Federation of Indian Chambers of Commerce & Industry (FICCI)
2.	Shaurya Jain	
3.	Debdatta Chowdhury	
4.	Sahdev Warang	Indian Chemical Counsil (ICC)
5.	Hema Jayakumar	Fine Organics
6.	V Sree shashhikanth	Apitoria Pharma Pvt. Ltd.
7.	Dhirendra Sinha	Reliance Industries Limited
8.	DN Dheer	
9.	Vikas Garg	Forace Speciality
10.	Prerana Meher	Confederation of Inidian Industry (CII)
11.	Ashok Kumar Maharshi	KLJ Organic Ltd.
12.	Amit Kumar Singh	Asian Paints
13.	Somak Chakraborty	
14.	Selvanayagi	Federation of Indian Export Organizations (FIEO)

15.	Mehul Jain	Adani Petrochemicals
16.	Santosh Kumar Singh	KLJ Group (Kanhaiya Lal Jain)
17.	Mark S Fernandes	Sylvester India
18.	Satish Kumar	KLJ Resources Limited
19.	Prateeksha Sharma	DOW
20.	Omprakash Agrawal	MACCIA
21.	Karunakar S Shetty	
22.	Paras	Tegral India
23.	Deepal Modani	
24.	Jyotsna	Bharat Rasayan
25.	Prashant Singh	Chambal Fertilizer
26.	Mohan Chaudhari	Deepak Fertilizers
27.	Jaimin Vasa	Gujarat Chemical Association
28.	Shalini Basu	CHEMEXCIL
29.	Ramya Shivam Goel	Dhanuka Agritech Ltd
30.	Shubhangam Khanna	Federation of Agri-Value Chain, Manufacturers & Exporter (FAME)
31.	Sagar Kaushik	
32.	Renu Sharma	Siddharth Carbochem
33.	Deepak Kumar	Bridgestone India
34.	Amitendu Daass	Oriental Rubber India Pvt. Ltd.
35.	Pramod Sabat	Surfactants Association of India
36.	Tarun Bhargava	
37.	Devdas Balachandran	Supreme Petrochem Ltd
38.	Karthigeyan	Manali Petrochemicals Limited

39.	Kshirod	IFFCO
40.	Dushyant Chouhan	
41.	Hrishikesh Deshmukh	

OLD AGENDA POINTS (ANNEXURE-I)					
Sr. No.	**Agenda Point**	**Sponsoring Association**	**Trade Comments**	**Record of Discussion**	**Action Taken**
1	**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 clarification.	PMFAI/Meghmani Dyes	No trade representative was present.	1. The Convenor confirmed that the comment from the FAG Mundra has been received and it is under examination. In brief the request is to allow reassessment of bill of entry, so as to enable the importers to take credit of IGST which is being paid subsequent to the initial assessment. 2. Comments from other ports are being sought to ascertain practice and a clarification in this matter will soon be issued if needed.	NAC Chemicals Secretariat
2	**Misdeclaration in Imports**: Final products are being imported by mis-labelling them as intermediates.	FMC Corp (FICCI)	In previous meetings, FICCI representative was asked to give specific details of such mislabelling. FICCI informed that they are still awaiting for response from FMC Corp.	1. The Convenor reiterated that upon receipt of response the point will be taken up for further discussion.	Closed

NEW AGENDA POINTS (ANNEXURE-II)					
Sr. No.	**Agenda Point**	**Sponsoring Association**	**Trade Comments**	**Record of Discussion**	**Action Taken**
1	**Delay in clearance of imported materials (ISO tanks/flexi tanks) and associated cost implications:** It is observed that delays occur in clearance of imported materials, particularly in the case of ISO tanks and flexi tanks, leading to increased port-related costs. The importer has represented that such delays, including those arising from testing requirements, significantly escalate expenses.	KLJ RESOURCES LTD.	Trade has represented that delays in clearance of imported materials, particularly ISO tanks and flexi tanks, including those due to testing requirements, are leading to increased port-related costs. It has been requested that provisional clearance/delivery to factory premises be allowed pending completion of formalities to reduce the cost burden.	The Convenor asked to present specific instances of such incidents for further examination of the issue.	KLJ RESOURCES LTD.
2	**Misdeclaration in import of agrochemicals leading to revenue and regulatory concerns:** 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	Trade has requested an opportunity to present evidence in this regard for appropriate action.	The Convenor asked to present a written representation along with all the documentary evidence of such incidents for further examination of the issue. The sponsoring body was also asked to meet the Convenor in person, if they so desire.	National Council on Chemicals of Assochem
3	**Delay in CDSCO NOC:** The process for obtaining CDSCO NOC involves two stages, taking about 5–6 days in the first stage and around 7 days in the second stage. This results in a total delay of nearly 12–14 days, leading to higher dwell time and additional burden on trade. Streamlining the process may be considered to facilitate ease of doing business.	Federation of Indian Export Organisations (FIEO)	This is a common issue faced by most exporters, particularly in Chennai, due to considerable time taken in the process. The matter has been raised in PTFC and CCFC meetings there	The Convenor requested for written representation along with specific cases. Upon receipt of representation, the Committee will take up the matter with concerned authority.	Federation of Indian Export Organisations

4	**<u>Delay in Refund of Anti-Dumping Duty</u>:** 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.	Asian Paints	The trade requested to look into the matter in order to expedite the process of refund for such Importers.	The Convenor asked the Secreiat to look into the matter and check the details of such pending refund cases with reasons of pendency and provide expeditious resolution.	NAC Secretariat
5	**<u>Regulatory Overlap and Compliance Burden</u>:** Multiple approvals from DGFT, Pollution Control Boards and other authorities, along with lack of inter-agency coordination, lead to duplication of compliances and delays.	Gujrat Chemical Association	Frequent regulatory changes without adequate transition time further add to the burden, especially for MSMEs, resulting in resource constraints, working capital blockage and higher impact of demurrage and detention charges.	The Convenor conveyed that the issue relating to approvals from Partner Govt Agencies / line Ministries may not fall directly within the scope of this Committee. However, the specific issues / cases may be submitted for examination and further consideration.	Gujrat Chemical Association
6	**<u>Issues in Duty Payment and IGST Credit on Excess Imports</u>:** a. In cases of excess quantity imports, there is no clear system-based mechanism for payment of duty & reassessment of BE. b. 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	1. While e-challan has been introduced, a uniform process for reassessment of Bills of Entry may be considered to facilitate proper duty payment and closure of such cases. 2. System integration may be considered to ensure seamless flow of credit to importers.	The Convenor asked the Secretariat to examine the matter in light of the provisions under Section 149 and Section 18A of the Customs Act, and recent advisories issued by DG Systems in these matters.	NAC Secretariat
7	**<u>Reassessment of BE due to system related issue</u>:** When BE is filed w.r.t. CTH 38237020 along with CVD, the CVD is not levied in the final viersion of BE.	Galaxy Surfactants	When BE is filed for import a product under HSN code 38237020, having CVD, it is not being levied in the system. It has to be recalled for reassessment, which takes 3-4 days for clearance instead of 1-2 days.	This seems to be a system related issue and the issue is arising in some cases, in which CVD is not being levied in the system. The sponsoring association was asked to raise the point along with examples of Bills of Entry so that the issue may be referred to DG systems.	Galaxy Surfactants
8	**<u>Query regarding ADC NOC</u>:** Query is being raised regarding ADC NOC despite the product not being dual use	Fine Organics	This is in regards to the ADC NOC that is being requested in the bill of entry, when a product is not under the ADC list or the dual use list, but still the query is being raised in the bill of entry.	Detailsof specific BEs were sought from the sponsoring association.	Fine Organics

9	**<u>Integration problem of FSSAI NOC</u>:** The integration has not been done yet and emails are being sent by them to Cutoms, manually.	Fine Organics	Problem is being faced wherever the shipments have to be cleared from the FSSAI. Importes have to follow up with the Customs while FSSAI are manually giving emails and then samples are drawn.	Written representation with clear details of the issue faced were sought from the sponsoring association, so that the matter can be taken up with FSSAI / SWIFT.	Fine Organics
10	**<u>Issue related to AD Code</u>:** If the BE has AD code of a bank and the payment has to be made through a different bank, clarity was sought if the BE can be amendmed	Siddharth Carbochem	If the BE has AD code of a bank and the payment has to be made through a different bank, clarity was sought if the BE can be amendmed	PN 93/2020 of JNCH may be followed	Closed
11	**<u>Expired Material under expired Bond</u>:** Clarity was sought on whether such goods can be exported.	Siddharth Carbochem	Some expired goods are kept under the Bond which has also expired. If a potential foreign customer is ready to buy this material, even though it is expired, how can this be exported?	The Pr. Commissioner stated that it would depend on the PGAs. If NOC is granted, Customs can clear the goods. As far as the bond expiry is concerned, bond validity can be extended, within provisions of the Customs Act. AC Bond may be approached for this.	Siddharth Carbochem
12	**<u>PN 33 for advance License</u>:** The request for payment of IGST but no reponse has been received.	Siddharth Carbochem/Rishabh Metals and Chemicals	The importer has sought to check status of their request for reassessment.	Convenor asked the Secretaiat to check with the concerned Group and revert.	NAC Secretariat
13	**<u>Recredit issue in reassessment cases</u>:** When the RODTEP and RoSCTL scrips are being utlised, system issues prevent refund.	Deepak Fertilizers	The trade is using RoDTEP and ROSCTL for payment of Basic Customs Duty for another client. However, during reassessment challenges are being faced in re-crediting the scrip amount. The recredited amount is reflected in the account under the trade’s login, but the same is not appearing in the Customs Ledger. Consequently, difficulties are being encountered in utilising this licence in another Bill of Entry.	If the e-scrip is bought from another person and used for payment of duty, then there is some system related issue, which has been already flagged to DG systems. If the e-scrip is in importer's name, there should not be any issue. If any issue is faced, specific details may be submitted.	Deepak Fertilizers

14	**<u>Issue regarding BE in faceless assessment</u>:** The goods land at the port but in the absence of assessed BE, berthing permission is denied.	Deepak Fertilizers	The trade is importing ammonium phosphoric acid for the manufacture of fertilizers. The shipments take approximately 3–4 days in transit (port of export to Nhava Sheva). For any Bill of Entry (BE) marked for faceless assessment, the process takes around 2–3 days. Further, the boarding department is not permitting berthing of the vessel without assessment of the BE and payment of duty.	Pr Commr (NS-I) to resolve the matter bilaterally with Deepak Fertilizers.	Pr Commr (NS-I)
15	**<u>Delay in customs clearance at major ports</u>:** Delay in assessment of hazardous and time-sensitive cargo.	Gujrat Chemical Association	Due to detailed scrutiny and multiple queries, there is delay in customs clearance at major ports like Nhava Sheva, Mundra and Hazira . It results in high dwell time specially for Hazardous and temperature sensitive cargos. So, there is need for risk based assessment and expedited clearance for compliant importers.	Customs is applying risk assessment since 2005. Specific cases were sought from the sponsoring association where delays noticed.	Gujrat Chemical Association
16	**<u>Dispute in classification of speciality chemicals, intermediates and mixtures across ports</u>:** There is a variation in assessment practises across ports leading to uncertainty and delays.	Gujrat Chemical Association	The trade requested for standardized classification guidelines.	Classification of imported goods is decided on the basis of elaborate chapter notes, sub-heading notes,rules of interpretation etc. incorporated in Customs Tariff, which are followed across India.First time importers can approach advance ruling authority in the case of classification issue. Specific instance may be submitted on the issue of variation in assessment.	Gujrat Chemical Association
17	**<u>Request to release of Bond and Bank Guarantee</u>**	Dow Chemicals	Details relating to the issue of release of bond and bank guarantee for chemical consignments at JNCH have already been submitted. The bond and bank guarantee were furnished for provisional assessment however, the assessment remains pending thereafter. Further details of the issue will be shared.	The sponsoring industry was asked to share the details related to the issue.	Dow Chemicals

18	**<u>Issue related to FDA License in case of exports:</u>** In the absence of which the exports are not permitted.	Surfactants Association of India	During the exports, one of the documents mandatorily asked is FDA license of the product. There are two main issues faced by the member companies during the air freights: 1. FDA license is not applicable for all the products, so problem is faced in submitting the FDA license. 2. The Dock Officer insists on the term “export” to be mentioned in the FDA licence. However, the FDAs do not issue licences specifically for export, as permission for export depends on the regulations of the destination country and whether such goods are permitted there.	As NAC Chemicals mandate is limited to faceless assessment of **imports** in chemicals sector, the issue doesn't fall under the mandate of this committee. The sponsoring association was asked to raise the issue to the concerned port.	Closed