



मुख्यसीमाशुल्कआयुक्तकार्यालय, मुंबईअंचल-II
Office of the Chief Commissioner of Customs
Mumbai Customs Zone-II

जवाहरलालनेहरूसीमाशुल्कभवन
JAWAHARLAL NEHRU CUSTOM HOUSE

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



_Date:07-05-2026

Record of discussion of NAC-Chemicals with FAGs and Trade Association held on 21.04.2026

1. A meeting of NAC (Chemicals) with FAGs and Trade Associations was held on 21.04.2026 at JNCH, Nhava Sheva, under the chairmanship of the Convenor, NAC (Chemicals) and Chief Commissioner of Customs, Mumbai Customs Zone-II.
2. During the meeting the following issues were discussed:
 - (i) The Commissioner, Mundra raised an issue regarding value enhancement in imports of PVC, regrind, reprocessed and off-grade plastics as per the Standing Order issued by Nhava Sheva. The Convenor informed that, based on earlier recommendations from Mundra, necessary system changes have been implemented to route such Bills of Entry for assessment, with facilitation provided for AEO clients.
 - (ii) BCBA requested that an acknowledgement may be issued for the grievance submitted by trade via email. The Convenor directed NAC (Chemicals) to ensure that acknowledgement and response emails are sent for such grievances.
3. A presentation on FAG performance for March 2026 was made by the NAC Secretariat covering key parameters such as queries raised, first checks ordered, BEs pushed to PAG, and assessment time. The following trends were observed:
 - (i) The percentage of queries declined from 22.75% (February 2026) to 21.70% (March 2026).
 - (ii) The percentage of BEs assessed under First Check increased from 6.06% to 6.68%.
 - (iii) The average assessment time increased from 39.73 hours to 40.74 hours.
4. Clarifications were sought from FAGs where performance parameters were not satisfactory, and remedial measures were discussed:
 - (i) In the case of Mundra, the query percentage was high and showed an increasing trend. The Convenor advised FAGs to devise suitable mechanisms to minimise avoidable queries, particularly in Group 2G.

(ii) It was noted that the number of BEs pushed to PAG was higher in Nhava Sheva.

(iii) It was also observed that dwell time had increased in Nhava Sheva. The concerned FAGs were advised to analyse the reasons and take corrective measures to reduce dwell time.

5. The agenda points raised by stakeholders were thereafter discussed. A brief record of discussions along with action points is placed at Annexure-I (New Agenda Points) and Annexure-II (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-A, Annexure - I, Annexure-II.

Copy to:
Chief Commissioner's Office, Mumbai-II, JNCH.
All Members of Trade Interaction Meeting.
Office copy

Annexure-A
NAC Chemical Meeting with Trade & FAG Held on
21.04.2026

List of Attendees

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 Zone-II
3.	Dr. Parul Singhal	Joint Commissioner of Customs, Mumbai Zone-II
4.	Shri Dinesh Kumar	Asst. Commissioner of Customs, Mumbai Zone-II
5.	Shri Rajkumar Mishra	Asst. Commissioner of Customs, Mumbai Zone-II
6.	Shri Kilaru Mahendranath	Asst. Commissioner of Customs, Mumbai Zone-II

FAG members attending the meeting:

Sr. No.	Name	Designation
1.	Shri Atul Saxena	Pr. Commissioner of Customs, Kolkata
2.	Shri Dheeraj Rastogi	Pr. Commissioner of Customs, Delhi
3.	Shri Manish Chandra	Pr. Commissioner of Customs, Mumbai Air Cargo
4.	Shri Alok Singh	Commissioner of Customs, Noida
5.	Shri Kumar Amrendra Narayan	Commissioner of Customs (Import-II), Mumbai
6.	Shri Nitin Saini	Commissioner of Customs, Mundra
7.	Ms. Jayabharathi	Additional Director, NCTC
8.	Ms. Bharti Sharma	Additional Commissioner of Customs, Delhi ACC
9.	Ms. D S Sangeetha	Additional Commissioner of Customs, Chennai Imports
10.	Shri Rakesh Bhadadiya	Additional Commissioner of Customs, Tughlakabad
11.	Shri Abhinav Yadav	Additional Commissioner of Customs, Bhubaneswar

12.	Shri Mukesh Rathore	Additional Commissioner of Customs, Kandla
13.	Shri Neelesh Rautkar	Additional Commissioner of Customs, Mumbai-III
14.	Shri Deepak Zala	Additional Commissioner of Customs, Mundra
15.	Shri M.S. Prithvi	Additional Commissioner of Customs, ICD Bangalore
16.	Shri Shyam Lal	Joint Commissioner of Customs, Cochin
17.	Ms. G Virudambikai	Deputy Commissioner of Customs, Chennai ACC
18.	Shri Harrison Antony	Deputy Commissioner of Customs, Cochin
19.	Shri L.M. Kalaiarasan	Deputy Commissioner of Customs, Tuticorin
20.	Shri Shiv Narayan Rajan	Assistant commissioner of Customs, ICD Bengaluru
21.	Shri R. Jones Ferling Raja	Assistant Commissioner of Customs, Chennai
22.	Shri P Murali Krishna	Assistant Commissioner of Customs, Vishakhapatnam
23.	Shri B.C. Dash	Assistant Commissioner of Customs, Kolkata
24.	Shri M. R. Bhatt	Assistant Commissioner of Customs, Kandla
25.	Shri Sundeeep Krishna	Assistant Commissioner of Customs, Pune
26.	Shri Jesang A Patel	Assistant Commissioner of Customs, Mumbai-I
27.	Shri Ranjit Rawool	Appraising Officer, Pune
28.	Shri Naveen K	Appraising Officer, Tuticorin

Representatives from Trade:

S. No	Name (Shri/Ms./Smt.)	Association
1	Hiren Ruparel	BCBA
2	Sudip Dey	FFFIA
3	Harsh J. Lapsia	AILBIEA
4	Jayyannt Lapsiaa	

NEW AGENDAPOINTS(ANNEXURE-I)

Sr. No.	Agenda Point	Sponsoring Association	Trade Comment	Record of Discussion	Action Owner
1	<u>Use of Camera during Examination-Board's Circular No. 07/2026-Cusotms dated 01.02.2026:</u> The implementation of this requirement in the context of liquid bulk cargo poses serious safety, legal and operational concerns.	AILBIEA	Examination report is given on the basis of Test Report and most ships don't allow Cameras on-board as they carry flammable substances, and use of body-worn cameras is not feasible as visual inspection is not possible in such conditions.	This is a policy matter. Industry has already represented to the Board. JNCH has also sent its recommendations to the Board.	Closed
2	<u>Persistent Issuance of Erroneous Examination Orders-Particularly in Liquid Bulk consignments:</u> Despite multiple circulars and repeated assurances aimed at minimizing and ultimately eliminating unwarranted and technically unsound examination orders, such practices continue unabated at certain FAG locations. Further the trade has submitted BE No. 8459310 dated 03.04.2026 in this regard.	AILBIEA	The examination order is not meant for this commodity, and PAG can take certain corrective action at their own accord.	The Convenor asked all FAGs to take note of this point to identify liquid bulk and to sensitize the respective officers to be considerate while issuing order for such commodities. Container-specific examination order for liquid bulk is completely erroneous. NAC Secretariat to examine this particular BE.	NAC Secretariat

OLD AGENDA POINTS (ANNEXURE-II)

Sr. No	Agenda Point	Sponsoring Association	Trade Comments	Record of Discussion	Action Owner
1	Unnecessary query raised reg dual use CDSCO NOC The association has submitted that queries have been raised for the Dual Use CDSCO NOC against BE which are not routed through CDSCO and are not covered under the notified dual use items list issued by CDSCO.	BCBA		Comments were sought from Pr. Commissioner, NS-III as the queries were raised by RMS-Facilitation Centre, JNCH. The response received is being examined by Secretariat.	NAC Chemicals Secretariat
2	Open examination of all consignments under CTH – 4801 It is submitted that Neutral Publishing House Limited is an authorized importer under the AEO Program and is entitled to facilitation benefits. However, pursuant to a DRI Circular concerning misuse under restricted CTH-4801 goods, all its consignments are being subjected to open examination. The mandatory transfer of containers to CFS is causing additional costs of approximately Rs. 1,10,000 per consignment (Rs. 11,500 per container plus GST), placing further strain on an already stressed newspaper industry. It is therefore requested that the matter be examined and the consignments be allowed direct port clearance with minimum inspection in accordance with AEO status.	Neutral Publishing House Limited via Kolkata Customs		DRI Circular which is triggering such examination orders is focused on imports by Traders only hence the Secretariat will issue an advisory to the field formations stating that the extent of checking should be limited to what is mandated in the DRI Circular and not beyond that. The Convenor also instructed the FAGs and PAGs to be judicious while applying such Alert Circulars.	NAC Chemicals Secretariat

3	Clarification regarding classification of LACTULOSE Concentrate USP/ Lactulose Solutions USP	Assistant Commissioner of Customs, Gr-5, Delhi (Preventive) Commissionerate, New Delhi	NA	NAC Secretariat to analyze the report received from Kolkata Customs and respond to CCP Delhi.	NAC Chemicals Secretariat
	During investigation, it was observed that the item Lactulose is being imported under different CTH namely CTH 2940-0000, 2942-0090 or 3003-9090. Lactulose is a synthetic sugar with laxative properties and is a disaccharide consisting of glucose and fructose units. In this regard, CTH 2940-0000 is for sugars, chemically pure, other than sucrose, lactose, maltose, glucose and fructose; sugar ethers, sugar acetals and sugar esters and their salts, other than products of headings 2937, 2938 OR 2939 whereas 2942-0090 is for other organic compounds. Also, CTH 3003-9090 is for other items falling under Medicaments (excluding goods of Heading 3002, 3005 or 3006) consisting of two or more constituents which have been mixed together for therapeutic or prophylactic uses, not put up in measured doses or in forms or packings for retail sale. Further, in some cases % of Lactulose in the Lactulose concentration-USP is not 100% & contains other ingredients also, wherein it remains unclear whether this purity of Lactulose concentration can be considered as “chemically pure substance”.				
4.	Re-imports Under Notification No. 45/2017: Re-imports filed under Notification No. 45/2017-Cus are also reportedly facing inconsistencies in assessment under Faceless	BCBA		S.O. 01/2026 dated 25.02.2026 has been issued to address the matter to the extent that such BEs can be recalled and reassessed by the AC/DC of PAG, and no prior approval of JC/ADC is needed.	NAC Chemicals Secretariat

Groups BILL OF ENTRIES ARE BEING ASSESSED WITHOUT IGST. Members have to apply for re-call and re-assessment for payment of IGST under E- office which again causes delay in clearances. We request you to kindly issue an Advisory for re-call and re-assessment to be done at PAG level only without processing under E-filing.			Letter to DG Systems in this regard to be sent by NAC Secretariat.	
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