



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:09-06-2026

**Record of Discussion of NAC-Chemicals with FAGs and Trade
Associations held on 29.05.2026**

1. A meeting of **NAC (Chemicals)** with concerned FAGs and Trade Associations was held on 29.05.2026 at **JNCH, Nhava Sheva**, under the chairmanship of the Convenor, NAC (Chemicals) and the Chief Commissioner of Customs, Mumbai Customs Zone-II, JNCH.
2. At the begining, a presentation on the performance of FAGs during April 2026 was made by the NAC Secretariat covering key parameters such as BEs assessed, queries raised, first checks ordered, Bills of Entry (BEs) pushed to PAG and assessment time. . It was noted that number of BEs assessed has increased by 7%, from 15296 (Mar 2026) to 16406 (Apr 2026). It was also observed that :
 - (i). the percentage of queries raised has shown a slight increase from 21.70 % (March, 2026) to 22.47 % (April, 2026).
 - (ii). Likewise, the overall percentage of BEs assessed under first check had increased from 6.68 % (March, 2026) to 8.02 % (April, 2026).
 - (iii). Overall percentage of BEs pushed to PAG has also increased slightly from 1.90 % (March, 2026) to 1.98 % (April, 2026).
 - (iv). Overall assessment time also increased from 40.74 hours (March, 2026) to 44.11 hours (April, 2026).
3. Clarifications were sought from specific FAGs where the parameters were not upto the mark and remedial measures were discussed:
 - (a) It was noted that the query percentage remained high (29%) in Gr. 2 and 2(A-B), Nhava Sheva, despite a decline over the previous month. An increase in query percentage (24% to 29%) was observed in Chennai Port for Gr. 2 and 2(A-B), while the query percentage for Gr. 2G continued to remain high (45%). The concerned Commissionerates were advised to analyse the reasons and take steps to reduce the

number of queries.

[Action: FAGs- Nhava Sheva & Chennai (sea)]

(b) With regard to first checks, the Convenor observed an abnormally high percentage (11% against all-India average of 2%) in Bengaluru FAG for Gr. 2(H-K) and in Chennai Port (42% against all-India average of 18%) for Gr. 2G. The concerned FAGs were advised to review the reasons for the increase and take corrective measures.

[Action: FAGs- Bengaluru & Chennai (sea)]

(c) The Convenor also requested Bengaluru, Mundra and Kandla FAGs, which recorded the highest assessment dwell time during April 2026, to analyse the causes and take necessary steps to improve dwell time.

[Action: FAGs- Bengaluru, Mundra, Kandla]

4. Visakhapatnam FAG raised the issue regarding non-updation of Anti-Dumping Duty Notification No. 02/2026 in the ICES system. The Convenor requested Visakhapatnam FAG and the NAC Chemicals Secretariat to take up the matter with DG Systems.

[Action Owner: FAG-Visakhapatnam and NAC Chemicals]

5. Thereafter, the agenda points sponsored by stakeholders were discussed. The detailed record of discussions and action points is placed at Annexure-I (New Agenda Points) and Annexure-II (Old Agenda Points), while the list of participants is placed at Annexure-A.

5.1 It was noted that very few FAGs were sponsoring agenda points for the NAC meetings. All FAGs were requested to sponsor sufficient number of agenda points for meaningful discussions.

[Action: All FAGs under NAC (Chemicals)]

This issues with the approval of the Convenor, NAC Chemicals.

(K Mahipal Chandra)
Addl 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
29.05.2026

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.	Ms. B. Sumidaa Devi	Commissioner of Customs, Nhava Sheva-I
3.	Shri K Mahipal Chandra	Secretary (NAC) & Additional Commissioner of Customs, Mumbai Customs Zone-II
4.	Dr. Parul Singhal	Joint Commissioner of Customs, Mumbai Zone-II
5.	Ms. Likhita V Umare	Dy. Commissioner of Customs, Mumbai Customs Zone-II
6.	Shri Rajkumar Mishra	Asst. Commissioner of Customs, Mumbai Zone-II
7.	Shri Ashesh Popatlal Patel	Asst. Commissioner of Customs, Mumbai Zone-II

FAG members attending the meeting:

Sr. No.	Name	Designation
1.	Shri Dheeraj Rastogi	Pr. Commissioner of Customs, Delhi
2.	Shri Kumar Amrendra Narayan	Commissioner of Customs, Mumbai I
3.	Shri Nitin Saini	Commissioner of Customs, Mundra
4.	Shri Manoj Prabhakar	Additional Commissioner of Customs, Noida
5.	Ms. Jayabharathi	Additional Director, NCTC
6.	Ms. Vineeta Sinha	Additional Commissioner of Customs, Tughlakabad
7.	Ms. D S Sangeetha	Additional Commissioner of Customs, Chennai Imports
8.	Shri Abhinav Yadav	Additional Commissioner of Customs, Bhubaneswar
9.	Shri Mukesh Rathore	Additional Commissioner of Customs, Kandla
10.	Shri Sanjay Bangartale	Additional Commissioner of Customs, Kolkata
11.	Shri Deepak Zala	Additional Commissioner of Customs, Mundra

12.	Shri Shyam Lal	Joint Commissioner of Customs, Cochin
13.	Shri Nitish Karnatak	Joint Commissioner of Customs, ICD Whitefield
14.	Shri Harrison Antony	Deputy Commissioner of Customs, Cochin
15.	Shri R. Jones Ferling Raja	Assistant Commissioner of Customs, Chennai
16.	Shri P Murali Krishna	Assistant Commissioner of Customs, Vishakhapatnam
17.	Shri Ramesh Kumar Kansotia	Assistant Commissioner of Customs, Delhi
18.	Shri B.C. Dash	Assistant Commissioner of Customs, Kolkata
19.	Shri M. R. Bhatt	Assistant Commissioner of Customs, Kandla
20.	Shri Ashlesh Maskar	Assistant Commissioner of Customs, Pune
21.	Shri Ranjit Rawool	Assistant Commissioner of Customs, Pune
22.	Shri Sivanarayanarajan	Assistant Commissioner of Customs, ICD Bangalore
23.	Shri Jesang A Patel	Assistant Commissioner of Customs, Mumbai-I

Representatives from Trade:

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

NEW AGENDA POINTS (ANNEXURE-I)

Sr. No.	Agenda Point	Sponsoring Association	Trade Comments	Record of Discussion	Action Owner
1	<u>Representation regarding procedural delays in OOC Processing - Sodium Cyanide import:</u> BCBA has raised issue regarding procedural delays in granting Out of Charge (OOC) for Sodium Cyanide import consignments under BE No. 8916873 dated 27.04.2026. The issue arises due to repeated routing of Bills of Entry between RMS Cell, AO, and DC for NOC approvals, involving multiple manual interventions and causing significant delays in clearance. Request for streamlining and simplification of the process to enable faster, system-driven clearances while maintaining regulatory compliance.	BCBA	The trade submitted that they will be confirming whether the issue is resolved or not.	OOC for BEs pertaining to Sodium Cyanide was suspended by the system due to intervention by NCTC. As of now, the suspension of BE has been revoked and the issue stand resolved.	Closed
2	<u>Suggestions for Reduction in Dwell Time for Plastic Regrind Items – NAC Chemical 3 Meeting Held on 21.04.2026:</u> Representation regarding high dwell time for plastic regrind imports (LDPE, HDPE, PVC, acrylic) due to mandatory First Check and testing although not covered under Standing Order 7433/99, despite declared values being accepted by Grouping Section. Request for trade facilitation measures including extended validity of Test Reports for repeat shipments and Green Channel/assessment relaxation for compliant importers, AEO holders, and MSMEs to reduce clearance delays and ensure supply chain continuity.	BCBA	The trade laid emphasis on trusting the importer for facilitation of trade and reduction of dwell time. BCBC also referred to JNCH Public Notice 81/2015 dated 15.10.2015 where test report is valid for six months in cases where the textile/textile articles of the same specification/quality are imported and the importer, supplier and the country of origin are the same. The trade submitted that the same procedure should be implemented for items of	It has been submitted by FAG, JNCH that since there is import policy angle involved in these goods, provisional assessment should not be done and assessment should only be done after test report. The same was also re-iterated by FAG Mundra where they have found some cases where the goods found to be other than declared including for imports by AEO clients.	NAC Chemicals Secretariat

			Chapter 39 as due to repetitive testing orders, there is increase in dwell time.	However, ICD PPG is assessing the BE provisionally. In the matter of relying on PTR (previous test report), the Convenor said that there should be a distinction between normal industrial products and products like plastic regrind which don't have any specific manufacturing protocol. The Convenor directed NAC Secretariat to examine the matter.	
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OLD AGENDA POINTS (ANNEXURE-II)

Sr. No.	Agenda Point	Sponsoring Association	Trade Comments	Record of Discussion	Action Owner
1	<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 trade thanked the Convenor for action taken in the matter.	NAC Secretariat to write to NCTC in this matter and request them to distinguish between liquid bulk and containerized cargo while issuing examination orders and ensure that aspects specific to containerized cargo are avoided in examination orders for liquid bulk.	Closed
2	<u>Unnecessary query raised reg dual use CDSCO NOC</u> 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	1. BCBA suggested a workflow in the system to incorporate the CDSCO Dual Use list in CCR instruction to avoid confusions. 2. AILBIEA stated that SWIFT 2.0 provides a clear approval workflow and argued that seeking dual-use NOCs outside the system creates a parallel process that undermines transparency and the purpose of SWIFT. They urged that any routing issues be resolved within the existing framework.	1. The Convenor informed that the issue of seeking dual use NOC, in-spice of the same being uploaded by the importer was taken up and the concerned officer would be sensitized. 2.The Convenor also asked BCBA for a detailed proposal with o8-digit codes of such dual use items, to incorporate dual use list in the system and the same will be examined and if need be forwarded to DG System 3.The Convenor acknowledged the concern raised by AILBIEA and requested a written submission from AILBIEA.	NAC Secretariat, BCBA, AILBIEA
3	<u>Clarification regarding classification of LACTULOSE Concentrate USP/</u>	Assistant Commissione	NA	Examination of the matter has been completed and NAC	NAC Secretariat

	<u>Lactulose Solutions USP</u> 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”.	r of Customs, Gr-5, Delhi (Preventive) Commissioner rate, New Delhi		Secretariat to respond to the sponsoring formation soon.	
4	<u>Re-imports Under Notification No. 45/2017</u> Re-imports filed under Notification No. 45/2017-Cus are also reportedly facing inconsistencies in assessment under Faceless Groups BILL OF ENTRIES ARE BEING ASSESSED WITHOUT IGST.	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 Secretariat

	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 for incorporating IGST to be sent by NAC Secretariat.	
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