



सीमाशुल्कआयुक्तकाकार्यालय
नवसीमाशुल्कभवन, पणंबूर, मंगलूर-५७५०१०
OFFICE OF THE COMMISSIONER OF CUSTOMS
NEW CUSTOMS HOUSE, PANAMBUR, MANGALURU – 575 010

Telephone No. 0824-2408164, website- <https://bangalorecustoms.gov.in> Email- commr-cusmnglr@nic.in

Comp No. 2103411

Date: as e-signed

MINUTES OF THE SECTORAL MEETING OF NAC-1A CHAIRED BY THE
CHIEF COMMISSIONER OF CUSTOMS, BENGALURU ZONE & CONVENOR
NAC 1A, ON 18.11.2025 IN ONLINE MODE

The Commissioner of Customs, Mangaluru extended a warm welcome to all participants. She expressed her gratitude for the presence of representatives from various sectoral associations, including liquid bulk importers, the coal sector, bitumen importers, the petroleum industry, major importers of goods of Chapter 27, as well as the Nodal Commissioners under NAC 1A, while highlighting that the Meeting provides an opportunity to understand sector-specific challenges, share updates, and collectively work toward enhancing compliance, operational ease, and attain overall trade efficiency.

The Convenor NAC 1A welcomed all the participants and thanked them for attending the Meeting. The Convener requested active participation from the Associations and requested for more Agenda Points in the future so that the issues could be expeditiously taken up for resolution and necessary improvements can be achieved. He also advised that the issues should be regularly raised by the stakeholders in the Fortnightly Sectoral Meetings being conducted by the Nodal Commissioners of NAC 1A.

The Agenda Points for discussion had been received only from AILBIEA (All India Liquid Bulk Importers and Exporters Association), MOPSA (Manufacturers of Petroleum Specialties Association) and FIPI (Federation of Indian Petroleum Industry).

AGENDA POINT 1:NO FIRST CHECKS TO BE GIVEN
FOR LIQUID BULK CARGO- SPONSORED BY AILBIEA

It was suggested that no First Checks should be ordered for Liquid Bulk Cargo as it delays the entire clearance process timeline and in case of any clarification, Provisional assessment may be resorted to Shri Harsh Lapsia, AILBIEA confirmed that he had previously raised the matter in the PTFC /CCFC/ Sectoral Meetings conducted by the Nodal Commissioners of NAC 1A.

The Convener explained that First Check assessment is being made for certain goods of CTH 2710 and it not for coal, lignite, waxes and similar goods dealt by NAC 1A. He requested AILBIEA to intimate if they have any knowledge of First Check assessment having been made for goods other than those falling under CTH 2710.

The Convener referred to Public Notice No. 60/2024 dated 03.12.2024 issued by the Commissioner, Customs, Chennai, Import II in this respect which was being followed by the FAGs of NAC 1A for assessment of goods falling under CTH 2710 and stated that in view of systematic mis-declaration of restricted goods like Kerosene, LDO, ADF, HSD etc. as Base Oils,

Fuel Oils etc. and frequent NCTC Alerts, the said Public Notice had been issued in consultation with the NCTC.

The Convener highlighted that even for goods falling under CTH 2710, First Check assessment was essentially a residuary mechanism which was not applicable if a PTR less than 6 months old was available and the importer was an actual user manufacturer or aAEOT2/T3 status holder. In such cases, only Second Check assessment was being resorted to. The Convener, however, requested AILBIEA to suggest parameters which could be incorporated for expanding the coverage of Second Check assessment to goods falling under CTH 2710.

**AGENDA POINT 2: MITIGATING DELAYS IN FACELESS ASSESSMENTS,
REQUEST FOR FAG DATA TO BE SHARED - SPONSORED BY AILBIEA**

It was suggested that a robust monitoring mechanism may be set up for smaller FAGs under NAC 1A and officers be sensitized on the time sensitive nature of Liquid Bulk Cargo. Further, it was requested that a report of each FAG on parameters of assessment timelines, number of queries and relevant aspects be shared with the Trade as was being done by NAC Chemicals. Shri Harsh Lapsia, AILBIEA confirmed that this point had been raised in the PTFC/CCFC/Sectoral Meetings conducted by the Nodal Commissioners of NAC 1A.

The Convener stated that all FAGs of NAC 1A were fully sensitized on the time sensitive nature of Liquid Bulk Cargo with the pendencies at each stage being regularly monitored by the Nodal Commissioners and detailed Query Analysis being conducted at the NAC level. Regarding the sharing of assessment data with the Trade, the Convener welcomed the suggestion in the interest of transparency and stated that the data sharing ought not to be limited to any particular NAC. He requested AILBIEA to forward the data received by them from NAC Chemicals so that a uniform protocol may be adopted in this regard.

**AGENDA POINT 3: PROVISIONAL TO FINAL - OLD PENDING CASES TO BE
COMPLETED- SPONSORED BY AILBIEA, MOPSA**

It was stated that a large number of BEs were pending for Final Assessment and a collective exercise should be undertaken for finalizing the assessments in a time bound manner. Shri Harsh Lapsia, AILBIEA confirmed that he had previously raised the matter in the PTFC/CCFC/Sectoral Meetings conducted by the Nodal Commissioners of NAC 1A and suggested that a lack of clarity in some Test Reports was impeding finalization.

The Convener stated that the finalization of Provisional Assessments was the responsibility of the proper officers of the Ports and the FAGs do not play any role in this process. He advised that this point should be raised in the PTFC/CCFC Meetings of the Ports concerned along with any issues in the interpretation of the Test Reports by the proper officers of the Ports.

The Convener also observed that Provisional Assessments arise primarily in Second Check cases and if the number of Provisional Assessments in goods assessed by the FAGs of NAC 1A is high, as is evident from the Agenda Point, it implies that a higher number of Second Checks are being ordered by the FAGs of NAC 1A as compared to First Checks.

**AGENDA POINT 4: CUSTOMS CHEMICAL LABORATORY (DYCC) - CRCL-
TIMELY REPORTS, TRANSPARENT METHODOLOGY, INTEGRATION OF CRCL
IN SINGLE WINDOW- SPONSORED BY AILBIEA, MOPSA**

It was suggested that the CRCL should have a transparent and efficient system for

testing and timely report sharing avenues. Further, the methodology adopted, as well as standards referred must be as per those mentioned in public domain, and the report must be specific to the Test Memo shared by the Customs. In some cases, the report contains references not mentioned in the Test Memo. This poses a significant challenge for the Appraising and Assessing Officers. These cases have also been discussed at the PTFC/CCFC Meetings. It was also suggested that CRCL should be integrated into the Single Window Interface and subsequently with RMS like FSSAI.

On being told that CRCL is already integrated with the ICEGATE module, Shri Harsh Lapsia, AILBIEA stated that the trade currently does not have access to Test Reports which are transmitted internally. He also stated that the CRCL Module varies across ports and Nhava Sheva has a digital tracking system could be universalized.

The Convenor stated that this issue had previously been discussed during the CRCL Conference held in New Delhi in July, 2025. He informed that efforts are underway to standardize the process for accessing Test Reports and to enable visibility of the stage at which a Test Report is pending, similar to the system currently implemented in FSSAI.

The Convenor requested the Commissioner, Customs, Mangaluru to obtain the details of the tracking system for CRCL Reports at Nhava Sheva and examine the best manner in which it can be replicated. He also requested the stakeholders to forward their views as to which PGA (FSSAI, PQ, AQ, Textile Committee or any other PGA) has achieved greater transparency and efficiency so that the best practices can be considered for wider implementation.

AGENDA POINT 5: EXTENSION OF VALIDITY OF TEST REPORTS - SPONSORED BY AILBIEA

It was stated that in case of import of the same goods by the same importer from the same manufacturer, currently the validity of Test Report is only 6 months which should be extended to a period of minimum 1 year, at least for the imports of Liquid Bulk cargo where the importers are limited, long standing and AEO status holders. Shri Harsh Lapsia, AILBIEA confirmed that he had previously raised the matter in the PTFC /CCFC/ Sectoral Meetings conducted by the Nodal Commissioners of NAC 1A.

The Convener observed that the validity period of 6 months for Test Reports is not specific to Liquid Bulk cargo. Therefore, it may not be possible to unilaterally modify this period exclusively for goods assessed by NAC 1A. He requested the stakeholders to intimate whether to their knowledge there are any goods for which the Previous Test Report is valid for a period longer than 6 months.

AGENDA POINT 6: AVOIDING SAMPLING AND PROVISIONAL ASSESSMENT OF GOODS WITH A VALID PTR (NOT MORE THAN SIX MONTHS OLD) COVERING IDENTICAL GOODS, GRADE, SPECIFICATIONS AND SUPPLIER/ MANUFACTURER- SPONSORED BY MOPSA

It was stated that where Importer is a Manufacturer and a valid PTR (not more than 6 months old) covering identical goods, grade, specifications and supplier/manufacturer is available with the importer, the same should be accepted at the time of Assessment and unnecessary Sampling and Provisional Assessment should be discouraged. Shri Uday Rege, MOPSA confirmed that he had previously raised the matter before the PTFC/ CCFC/ Sectoral Meetings conducted by the Nodal Commissioners of NAC 1A.

The Convener reiterated that Public Notice No. 60/2024 dated 03.12.2024 issued by the Commissioner, Customs, Chennai, Import II was being followed by the FAGs of NAC 1A in this respect and stated that if the Trade observes any deviations from the mechanism of Sampling and Provisional Assessment specified in the said Public Notice, such deviations should be immediately brought to the Department's attention for review and necessary action.

He also requested the stakeholders to forward suggestions for expanding the coverage of Second Checks with Final Assessment, which is being followed at present for goods falling under CTH 2710 if the PTR is less than 6 months old, the importer is an actual user manufacturer and the overseas supplier is also a manufacturer.

AGENDA POINT 7: BEs WHICH IS FILED WITH THE OPTION OF PROVISIONAL ASSESSMENT ARE ASSESSED FINALLY BY RMS WITHOUT DEBITING THE PROVISIONAL AMOUNT. THE BEs THEN HAVE TO BE RECALLED AND RE-ASSESSED RESULTING IN ADDITIONAL TIME – SPONSORED BY FIPI

The Agenda Point was deferred as no representative from FIPI joined the Meeting.

AGENDA POINT 8: BES ASSESSED FINAL IN CASE OF ASSESSES WHO HAS OPTED FOR DEFERMENT SCHEME OF DUTY PAYMENT – SPONSORED BY FIPI

The Agenda Point was deferred as no representative from FIPI joined the Meeting.

AGENDA POINT 9: SUGGESTIONS TO MAKE AVAILABLE OPTIONS FOR VIEWING BE DETAILS AND SIGNATORY FOR E-BOND IN ICEGATE – SPONSORED BY FIPI

The Agenda Point was deferred as no representative from FIPI joined the Meeting.

AGENDA POINT 10: REQUEST FOR SEPARATE MEETING WITH CRCL - DYCC TO ADDRESS ISSUES ARISING FROM INTERPRETATIVE DIFFERENCES AND ERRONEOUS CONCLUSIONS BEING DRAWN ESPECIALLY IN CASE OF VOLUNTARY BIS IS 18722 (PART I) 2024, AND IN CASE OF BASE OILS USED FOR NON-LUBRICATING APPLICATIONS – SPONSORED BY AILBIEA AND MOPSA

Shri Uday Rege, MOPSA raised the issue and stated that after the issuance of BIS Standard IS 18722 (Part 1), the Trade has been facing various issues in the clearance of Base Oils due to the misinterpretation by CRCL leading to issue of negative remarks in the Test Reports.

The Convener stated that the FAGs of NAC 1A mention the Tariff description in the Test Memos of the goods whose samples are to be drawn. If the Tariff description of the goods contains a BIS standard, that exact standard is mentioned in the 'Query Description', but if the Tariff description of the goods does not contain a BIS standard, no standard for those goods is mentioned in the 'Query Description'. Since Base Oil (2710 19 71) does not contain any BIS standard in the Customs Tariff, no BIS standard on the basis of which the samples of Base Oil are to be tested is being mentioned by FAGs of NAC 1A in the Test Memos. Therefore, Base Oil (for which no BIS standards have been specified in the Customs Tariff) is being tested on the basis of the BIS standards prescribed by CRCL. If the BIS standards for Base Oil prescribed by CRCL are found to be erroneous, the issue should be raised with the appropriate authorities.

The Convener also requested the stakeholders to share any CRCL reports containing additional or extraneous remarks so that the matter can be appropriately addressed.

**AGENDA POINT 11: UNIFORMITY IN PROCEDURE AND PRACTICE ACROSS
LOCATIONS HANDLING LIQUID BULK CARGO –SPONSORED BY AILBIEA**

It was suggested that there should be uniformity and simplification in procedures and practices regarding storage of Liquid Bulk Cargo in Shore Tanks. Revamping the process of discharge of Liquid Bulk Cargo into Bonded Tanks and its subsequent clearance will optimize the storage infrastructure at Ports and will maximize the throughput of Liquid Bulk Cargo.

The Convener intimated that after reviewing the prevailing practices of storage of Liquid Bulk Cargo in Shore Tanks prevailing in major Ports of the country, the matter has been examined in the light of the complexity and unique nature of Liquid Bulk Cargo and suitable recommendations have been forwarded to the Board.

The Meeting concluded with a Vote of Thanks extended by the Commissioner of Customs, Mangaluru to the Convener and all participants.

This issues with the approval of the Convenor of NAC-1A.

Digitally signed by

BIJU THOMAS

Date: 27-11-2025

18:03:07

**Additional Commissioner of Customs
New Customs House, Mangalore**

To,

The Nodal Pr. Commissioner/ Commissioner of Customs, NAC-1A (Mineral Products, Ch.27): Mumbai Imports-II/ Bhubaneswar (Preventive)/ Vishakhapatnam/ Chennai Imports-II/ Cochin/ Jamnagar/ Mangaluru.

LIST OF OFFICERS WHO ATTENDED THE MEETING

1. Shri Prasad Adelli, Commissioner of Customs, Chennai Commissionerate
2. Shri Dharendra Lal, Commissioner of Customs, Jamnagar Commissionerate
3. Shri Kumar AmrendraNarayan, Commissioner Mumbai Import-II Commissionerate
4. Shri Biju Thomas, Additional Commissioner of Customs, Mangaluru
5. Dr. Subhash Yadav, Additional Commissioner of Customs, Mumbai Import-II
6. Ms. D S Sangeetha, Additional Commissioner, Chennai Import-II Commissionerate
7. Shri Amit Kumar Singh, Additional Commissioner of Customs, Jamnagar
8. Shri Parry Vallal, Additional Commissioner of Customs, Bhubaneswar
9. Shri Akash Singla, Joint Commissioner of Customs, Vizag
10. Shri Senthil Murugan, Deputy Commissioner of Customs, Chennai
11. Shri Haridas A, Assistant Commissioner of Customs, Mangaluru
12. Shri Vikas, Appraiser of Customs
13. Shri Rahul Shukla, Superintendent of Customs

LIST OF TRADE REPRESENTATIVES WHO ATTENDED THE MEETING

1. Shri D.N. Gupta President CHA Mundra port Association
2. Shri Uday Rege, Manufacturers of Petroleum Specialties Association
3. Shri Harsh Lapsia, All India Liquid Bulk Importers and Exporters Association
4. Shri Vinod Kumar, JM Baxi (CHA)
5. Shri Sudip Dey Hon. Secretary, Federation of Freight Forwarders' Associations of India
6. Shri Vinod Sharma, Federation of Freight Forwarders' Associations in India
7. Shri Hiren Ruparel, BCBA