



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:07-09-2026

**Record of Discussion of NAC-Chemicals with FAGs and stakeholders held on 25.08.2026**

1. A meeting of **NAC (Chemicals)** with concerned FAGs and stakeholders was held on 25.08.2026 at **JNCH, Nhava Sheva**, under the chairmanship of the Convenor, NAC (Chemicals) and the Chief Commissioner of Customs, Mumbai Customs Zone-II, JNCH.
2. The Convenor highlighted the need for meaningful agenda points beyond routine exercise and urged all FAGs to sponsor agenda points for discussion in NAC meetings on assessment-related issues, particularly classification, valuation, exemptions, legal matters, audit observations etc. in a structured manner.
- 3 . A presentation on performance of FAGs during July 2026, pertaining to parameters of Queries raised, First checks ordered, BEs pushed to PAG and Assessment time, was made by the NAC Secretariat. It was observed that:
  - (i). The percentage of queries raised has shown a slight decline from 21.68 % (June, 2026) to 20.32 % (July, 2026).
  - (ii). Also, the overall percentage of BEs assessed under first check also decreased slightly from 7.08 % (June, 2026) to 6.73 % (July, 2026).
  - (iii). However, overall percentage of BEs pushed to PAG increased from 1.93 % (June, 2026) to 2.34 % (July, 2026).
  - (iv). Furthermore, overall assessment time has increased from 40.27 hours (June, 2026) to 42.15 hours (July, 2026).
- 4 . Clarifications were sought from specific FAGs where the parameters were not up to mark and remedial measures were discussed. For instance,
  - (a) The Convenor observed that there has been no improvement in the query

percentage figures of Nhava Sheva. Furthermore, the Convenor stated that, as Nhava Sheva assesses maximum number of Bills of Entry, the port's performance has a significant bearing on the overall performance of NAC.

[Action Owner: Nhava Sheva]

(b) The Convenor further noticed significant increase in Assessment time of Vizag and Mumbai-I. The convenor urged concerned Commissionerates to analyse the issue with a view to reducing the assessment time.

[Action Owner: Vizag and Mumbai-I]

(c) The Convenor noted that Gr 2G contributes the maximum number of BEs (about 48% in Jul 2026), and the maximum per centage of queries (about 25%) are also raised by Gr 2G, thus adversely affecting the overall performance of this NAC. The concerned FAGs were asked to forward the reasons of high percentage of queries in Gr 2G, particularly when the nature of commodities and clearance requirements are well known to importers, CBs as well as customs officers.

[Action Owner: Mundra, Bengaluru, Noida, Kolkata, Chennai (Sea), Delhi (Air) and Nhava Sheva]

5. Representatives from trade and customs broker associations raised concerns about dual-use permissions, drug controller NOCs, and procedural delays causing increased dwell times. Issues with digital license visibility and system queries were highlighted. Trade representatives requested clarity on dual-use permissions and port office NOCs and further suggested to include PGAs in future meetings for better co-ordination. The Convenor requested FFFAI to collate all such issues from different members bodies and make one single submission.

[Action Owner: FFFAI]

6. A brief record of discussion, along with actions need to be taken, is placed as 'Annexure-I' and list of attendees is placed at 'Annexure-A'.

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

Digitally signed by  
Solanki Rajesh Ramlal  
Date: 07-09-2026  
17:51:13

**RAJESH RAMLAL SOLANKI**

(Rajesh R Solanki)  
Asst. Commissioner, NAC(Chemicals)  
JNCH, Nhava Sheva

Encl: Annexure-A and Annexure-I

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** **25.08.2026** **List of Attendees**

The following officers of the department attended the meeting:

| <b>S. No</b> | <b>Name</b>                | <b>Designation</b>                                                    |
|--------------|----------------------------|-----------------------------------------------------------------------|
| 1.           | Ms. B. Sumidaa Devi        | Commissioner of Customs, Nhava Sheva-I                                |
| 2.           | Ms. Himani Dua             | Secretary (NAC) & Joint Commissioner of Customs, Mumbai Zone-II       |
| 3.           | Shri Rajesh R Solanki      | Asst. Commissioner of Customs, (NAC) Chemical, Mumbai Customs Zone-II |
| 4.           | Shri. Pankaj Khandagale    | Joint Commissioner of Customs, Mumbai Customs Zone-II                 |
| 5.           | Shri Rajesh Ranjan Verma   | Asst. Commissioner of Customs, Mumbai Zone-II                         |
| 6.           | Shri Ashesh Popatlal Patel | Asst. Commissioner of Customs, Mumbai Zone-II                         |

### **FAG Members attending the meeting:**

| <b>Sl.no.</b> | <b>Name</b>            | <b>Designation</b>                                 |
|---------------|------------------------|----------------------------------------------------|
| 1             | Shri Dheeraj Rastogi   | Pr. Commissioner of Customs, Delhi                 |
| 2             | Shri N. Naresh         | Commissioner of Customs, Chennai Port              |
| 3             | Shri Alok Singh        | Commissioner of Customs, Noida Customs             |
| 4             | Shri P Amaresh         | Additional Commissioner of Customs, Vishakhapatnam |
| 5             | Shri T Parry Vallal    | Additional Commissioner of Customs, Bhubaneshwar   |
| 6             | Smt. Sandeep Kaur      | Joint Commissioner of Customs, Tughlakabad         |
| 7             | Shri Deepak Zala       | Additional Commissioner of Customs, Mundra         |
| 8             | Shri Abhay Lulu        | Additional Director of Customs, NCTC               |
| 9             | Shri Bhoopanand Sharma | Additional Director of Customs, NCTC               |
| 10            | Shri B Vinayak         | Joint Commissioner of Customs, Tuticorin           |
| 11            | Shri. Raunaq Ansari    | Joint Commissioner of Customs, Kolkata             |
| 12            | Mr. Jay Waghmare       | Joint Commissioner of Customs, Mumbai-I            |

|    |                             |                                                  |
|----|-----------------------------|--------------------------------------------------|
| 13 | Dr. Saranya C               | Joint Commissioner of Customs, Chennai Port      |
| 14 | Ms. Radhika Venugopalan     | Joint Commissioner of Customs, Chennai Air Cargo |
| 15 | Ms. Megha Bansal            | Joint Commissioner of Customs, Delhi             |
| 16 | Shri Sunil Kumar Srivastava | Joint Commissioner of Customs, Mumbai-III        |
| 17 | Shri Nitish Karnatak        | Joint Commissioner of Customs, Bengaluru ICD     |
| 18 | Shri Harrison Antony        | Deputy Commissioner of Customs, Cochin           |
| 19 | Smt. Anuja Musale           | Deputy Commissioner of Customs, Mundra           |
| 20 | Smt. Sridevi                | Assistant Commissioner of Customs, Chennai Port  |
| 21 | Shri Murli Krishna          | Assistant Commissioner of Customs, Vizag         |
| 22 | Shri Ashlesh Maskar         | Assistant Commissioner of Customs, Pune          |
| 23 | Shri Ramesh Kumar Kansotia  | Deputy Commissioner of Customs, Delhi            |
| 24 | Shri M. R. Bhatt            | Assistant Commissioner of Customs, Kandla        |
| 25 | Shri LM Kalaiarasan         | Deputy Commissioner of Customs, Tuticorin        |

**Representatives from Trade:**

| <b>S. No</b> | <b>Name (Shri/Ms./Smt.)</b> | <b>Association</b> |
|--------------|-----------------------------|--------------------|
| 1.           | Hiren Ruparel               | BCBA               |
| 2.           | Sudip Dey                   | FFFAI              |
| 3.           | Dushyant Mulani             | FFFAI              |
| 4.           | Harsh Lapsia                | AILBIEA            |
| 5.           | Nimish Desai                | WISA               |
| 6.           | Uday Kumar Pan              | B.M. Logistics     |
| 7.           | RN Sekar                    | CCBA               |
| 8.           | Pramod Soneta               | HEMJYOT AGENCY     |
| 9.           | Dinesh Gupta                | KCBA,MCBA          |

**OLD AGENDA POINTS(ANNEXURE-I)**

| <b>Sr. No.</b> | <b>Agenda Point</b>                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Sponsoring Association</b> | <b>Comments from Sponsoring Association</b>                                                                   | <b>Record of Discussion</b>                                                                                                                                                                                                                                  | <b>Action Owner</b> |
|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|---------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| 1.             | <b>Issues with Drug Controller NOCs and Test Report Accessibility</b><br><br>Concerns were raised about delays in obtaining Drug Controller NOCs and the lack of system integration for test reports, which hampers trade efficiency and setting timelines for NOCs and enabling automatic sharing of test reports with importers and customs brokers through the system.                                                               | AILBIEA & BCBA                | It was proposed to make system enhancements to allow automatic access to test reports for trade stakeholders. | In the previous meeting, the Convener referred to the ongoing discussions with authorities in CCFC meetings and encouraged the stakeholders for submission of proposals for forwarding to DG Systems.<br><br>However, no written proposals were received.    | Closed              |
| 2.             | <b><u>Issues in Additional Qualifier:</u></b><br><br>Due to a system issue, the Bill of Entry does not move ahead in the system and throws an error stating that the Additional Qualifier has not been declared, even in cases where it has been declared correctly. This system-level error leads to unnecessary queries, adding to the processing burden on both trade and the Department without any corresponding compliance lapse. | Group 2(C-F), JNCH            | Agreed to provide more information.                                                                           | The matter was discussed in the previous meeting when DG Systems informed about the resolution being provided.<br><br>The matter has now been resolved after a system patch was deployed by DG System following which no new instances have been encountered | Closed              |
| 3.             | <b><u>Non-Uploading of Critical Documents (e.g., CIB Certificate Amendments, MSDS):</u></b><br><br>Customs Brokers/Importers are not uploading critical/mandatory documents such as CIB certificate                                                                                                                                                                                                                                     | Group 2(C-F), JNCH            | Agreed to provide more information.                                                                           | Group 2(C-F), JNCH provided two instances where the BEs were pushed back to PAG for non-compliance of queries                                                                                                                                                | Closed              |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                |                                                                                                                   |                                                                                                                                                                                                                   |                 |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|-------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
|    | <p>amendments, MSDS (Material Safety Data Sheet), and other certificates at the time of filing the Bill of Entry, which leads to avoidable queries being raised by FAG officers, resulting in delay in assessment and clearance.</p> <p>In cases involving regulated/hazardous/restricted goods (e.g., pesticides, chemicals), non-availability of MSDS or CIB amendment at the time of assessment creates compliance and safety-verification gaps.</p> |                |                                                                                                                   | <p>raised for necessary documents.</p> <p>Convenor asked CBs to take note and avoid such instances in future.</p> <p>A separate <b><u>note</u></b> is attached at the end.</p>                                    |                 |
| 4. | <p><b>Re-verification of defaced FTA certificates at ex-bonding stage:</b></p> <p>FFFAI submitted that certificates already defaced at the time of bonding are being questioned again at ex-bonding. Customs officials at bond and ex-bond stages are asking for re-validation despite prior defacement.</p>                                                                                                                                            | FFFAI          | The trade requested for a resolution.                                                                             | <p>In the previous meeting, the Convenor had asked for specific examples/illustrations so that the concerned formations could be advised suitably.</p> <p>However, no such examples were received from FFFAI.</p> | Closed          |
| 5. | <p><b>Enable "View Report" functionality for trade on the DYCC test report module:</b></p> <p>The "View Report" interface already exists on ICES but is not enabled for trade. While email-based sharing (via BE number, date, email ID, and OTP) is a helpful interim step, direct online access would be far more efficient. Requested that the functionality be enabled for trade.</p>                                                               | AILBIEA & BCBA | Reiterated that enabling the "View Report" functionality would be the best possible outcome for the entire trade. | A letter has been sent to DG Systems conveying the ask of stakeholders.                                                                                                                                           | Closed          |
| 6. | <p><b>Practical Difficulties in Assessment of Small-Quantity Imports Under Test Bond (TB):</b></p> <p>Assessment of Bills of Entry for import of precious metal colloids (HS Code 284310) under valid DGFT licence involves</p>                                                                                                                                                                                                                         | FFFAI          | FAGs may be sensitized to refrain from ordering for testing for such small quantity imports                       | Letters sent to all FAGs and CRCL seeking comments and suggestions.                                                                                                                                               | NAC Secretariat |

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |                                                             |  |  |
|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------|--|--|
|  | <p>practical difficulties where consignments are of extremely small quantities (less than 100 grams, including quantities in grams and milligrams).</p> <p>Bills of Entry Nos. 9818461 dated 11.06.2026, 2438194 dated 10.07.2026, 2456079 dated 11.07.2026, and 2456070 dated 11.07.2026 have been assessed under Test Bond (TB) by the FAG officer, resulting in insistence on sample drawing before clearance. Due to the limited quantity imported, sample drawing substantially reduces or exhausts the usable quantity, causing avoidable hardship and delays.</p> <p>Further, repeated queries are being raised on issues already clarified in earlier Bills of Entry for similar imports, leading to prolonged assessment and duplication of efforts.</p> |  | <p>which are for research and development purpose only.</p> |  |  |
|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------|--|--|

**Note w.r.t. Agenda no. 3:**

On the issue of “*Non-Uploading of Critical Documents (e.g., CIB Certificate Amendments, MSDS)*”, Group 2C-F, Nhava Sheva provided the following examples:

**a) Bill of Entry No. 2251139 dated 02.07.2026**

The importer M/s Corteva Agriscience India Pvt Ltd submitted only a copy of the amendment to the CIB Certificate, without the underlying registration certificate. A query was raised to the importer; however, the importer continued to furnish only the IRN number of the amendment certificate. The Bill of Entry was accordingly pushed back, following which the importer submitted the requisite copy.

**b) Bill of Entry No. 2319580 dated 04.07.2026**

In another case, a query was raised to the importer M/s P2P Trimpex Pvt Ltd for the CIB Certificate. The importer replied that the goods were not covered under the Insecticides Act. The Bill of Entry was accordingly pushed back to PAG for further necessary action.