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:18-09-2026

Record of Discussion of NAC-Chemicals with Industry Associations held on 09.09.2026.

A meeting of NAC (Chemicals) with concerned Industry Associations was held on 09.09.2026 at JNCH, Nhava Sheva, under the chairmanship of the Convenor NAC (Chemicals), Mumbai Customs Zone-II, JNCH.

2. For this meeting representatives from Industry and concerned Trade Associations were invited.

3. The agenda points sponsored by the stakeholders were taken up. A brief record of discussion, along with actions required 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 Convenor, NAC Chemicals.

Digitally signed by
Solanki Rajesh Ramlal
Date: 18-09-2026
11:18:37

RAJESH RAMLAL SOLANKI

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

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 09.09.2026

List of Attendee

The following officers of the department attended the meeting:

S. No	Name	Designation
1.	Smt. B Sumidaa Devi	Commissioner of Customs, NAC Chemical, Mumbai Customs Zone-II
2.	Smt. Himani Dua	Secretary (NAC) & Joint Commissioner of Customs, Mumbai Customs Zone-II
3.	Shri Rajesh R Solanki	Asstt. Commissioner of Customs, NAC, Mumbai Customs Zone-II

Representatives from Industry associations:

S. No	Name (Shri/Ms./Smt.)	Association
1.	Shri Yuvraj Chopra	BASF
2.	Shri Jaimin Vasa	Gujarat Chemical Association
3.	Shri Mohammed Rizwan	Celanese
4.	Princy Gupta	FOIL
5.	Kuldeep Sawant	FOIL
6.	Ketki Kulkarni	GPC
7.	Naresh Patel	CII
8.	Shrushti	GPC
9.	Dr. Nair	GPC
10.	Manoj R Shah	AIPMA

Old Agenda Points (Annexure-I)					
Sr. No.	**Agenda Point**	**Sponsoring Association**	**Trade Comments**	**Record of Discussion**	**Action Owner**
1.	**Denial of request for reassessment of BOE after issuance of summons by DRI:** The party submitted that they imported 111,000 kgs of Mono Isopropyl Amine vide BE No. 9342893 dated 18.05.2026. At the time of self-assessment, assessment by the officer, and duty payment on 19.05.2026, no anti-dumping duty was leviable, as ADD Notification No. 08/2026-Customs (ADD) was issued only on 22.05.2026. OCC was granted on 27.05.2026. Upon learning of the non-levy through DRI summons, the party submitted a request on 16.06.2026 to the jurisdictional Deputy Commissioner for reassessment and payment of the applicable ADD with IGST and interest. The same has not been permitted. The party requests that reassessment be allowed at the earliest.	Meghmani Dyes	The importer filed the Bill of Entry, completed assessment, and paid the applicable customs duty before the issuance of Notification No. 08/2026-Customs (ADD) dated 22.05.2026 imposing Anti-Dumping Duty (ADD) on Mono Isopropyl Amine. After receiving a DRI summons regarding the non-levy of ADD, the importer voluntarily requested reassessment of the Bill of Entry to pay the applicable ADD, along with IGST and interest. However, reassessment has not been permitted, and the importer has requested early approval to enable payment of the applicable dues.	Importer informed that as duty is already paid, they requested to reassess the said BoE and appropriate the said payment made by Challan, so that IGST so paid can reflect on the GSTN portal." Importer paid ADD vide challan dated 27.07.2026 The importer was informed that as per Para 5(a) of Section 18A of C.A. '62- *"No revision of entry shall be made under this section in the following cases, namely: ––* *(a) cases where any audit under Chapter XIIA or search, seizure or summons under Chapter XIII has been initiated and intimated to the importer or the exporter concerned;"* Sponsor was asked to submit a detailed representation for referring the matter to CBIC for policy-level consideration. No response received	**Closed**

2.	**Change in name of the Manufacturer/Source company:** In normal business operations, companies do change the legal name of manufacturer for differentiation, re-branding or restructuring etc. The changed name of the manufacturer gets reflected in the commercial invoices and other import-related documents. An example is Chage of name of manufacturer from ABC Corporation to ABC Agricultural Solutions Corporation. It may be noted that a change in the manufacturer's name is purely administrative in nature (it has no impact on the quality, safety and bio-efficacy of a crop protection product). However, endorsement of such changes on the Registration Certificate of the crop protection products is subject to the processing timelines of CIB&RC and may take due time to be issued. Any delay in updating the Registration Certificate could potentially impact imports, particularly considering the seasonal demand and usage patterns of the products concerned.	CropLife India,BASF	If the manufacturer's name appearing on the invoice does not match with that mentioned in the Registration Certificate issued by the Central Insecticides Board & Registration Committee (CIB&RC), 1) the matter may kindly be brought immediately to the attention of the Secretary, CIB&RC (cibsecy@nic.in), with a copy marked to the company representative, so that it could be quickly resolved. 2) We also respectfully request Customs authorities to kindly permit clearance of such consignments (where the manufacturer's name appearing on the invoice differs from that on the Registration Certificate solely on account of a pending name-change endorsement) based on the importer's declaration regarding the change of name, along with documentary evidence demonstrating that an application for endorsement of the name change has been duly submitted to CIB&RC and is under their	The Convenor advised the representative from BASF to approach CIBRC for the issuance of advisory to customs in such cases, as Customs cannot unilaterally relax the prescribed requirements owing to jurisdictional limitations.	**Closed**

			consideration. This approach would help minimize the risk of delays in customs clearance and help in avoiding potential of disruption in legitimate trade while the administrative process for updating the Registration Certificate is being completed.		
3.	**Issue of permissible tolerance limits.** We are frequently receiving deficiency from Custom Authorities regarding mismatches between the A.I. loading in the product and the values reported in the CoA. However, CIBRC has already issued a notification to CBIC (attached), Customs authorities regarding the permissible tolerance limits.	CropLife India, Syngenta	Queries regarding A.I. loading are being raised arbitrarily by the field formations.	The sponsor requested that field officers be trained on the Notification issued by CIB,RC. Convenor advised the sponsor to coordinate separately with the NAC secretary to schedule the training.	**Closed**

NEW AGENDA POINTS (ANNEXURE-II)					
Sr. No.	**Agenda Point**	**Sponsoring Association**	**Trade Comments**	**Record of Discussion**	**Action Owner**
1.	**Drawl and testing of samples of bulk liquid solvents and chemicals:** Representation seeking a policy clarification on the drawl and testing of samples of bulk liquid solvents and chemicals — request for (i) exclusion from routine testing of commodities whose classification and valuation do not turn on grade, (ii) a Common Test Protocol for cargo lying commingled in common shore tanks, and (iii) parity with Circular No. 28/2026-Customs on acceptance of accredited laboratory reports.	Hemjyot Agency	No comments were offered on behalf of the sponsor	(i) The Convener requested the representative of the sponsor to furnish a list of imported chemicals, along with a few illustrative Bills of Entry, highlighting the sampling practices followed at other Customs Houses, for examination. (ii) The Convenor directed that the views of the FAGs be obtained regarding the procedure followed for drawing samples from commingled cargo, to facilitate a better understanding and examination of the matter. (iii) The Convenor stated that, after a detailed examination of the issue, the representation may be considered for referral to CBIC for consideration at the policy-level.	Hemjyot Agency & NAC Secretariate
2.	**Urgent preventive action on clearance of Natural Camphor (CAS 454-49-3) :** Representation seeking Urgent preventive action on clearance of	AII lndia Manufacturing Association (AIMO)	No one was present on behalf of the sponsor to offer their comments.	The Convener asked the Secretariat to circulate the notification to all Customs formations, highlighting the Sponsor's concerns regarding possible lack of uniformity in respect of compliance with the Gazette Notification S.O. 3901(E)	**Closed**

	Natural Camphor – request for (i) strict implementation of Gazette Notification S.O. 3901(E) dated L5.07.2026 – Natural Camphor now specifically included in the Schedule to the lnsecticides Act, 1968 with effect from 15.07 .2026 (ii) immediate written instructions to all concerned formations (Appraising, Assessment, SIIB/ClU, RMS, Docks, Preventive, Shed) to ensure uniform compliance and prevent circumvention of the Notification.			dated L5.07.2026.	