

An aerial photograph of a port terminal. The image shows several large green gantry cranes used for loading and unloading shipping containers. The containers are stacked in rows, with various colors like red, blue, and yellow visible. In the foreground, there is a paved area with several white cars parked or moving. The background shows a body of water and some buildings under a clear sky.

TIME RELEASE STUDY 2022

Mumbai Customs Zone II

Nhava Sheva

ACKNOWLEDGEMENTS

The TRS Study team would like to thank all those who contributed to the study, and in particular the members of trade and industry, their

representative Custom Brokers (CBs), all Participating Government Agencies (PGAs) Jawaharlal Nehru Port Authority

(JNPA), JN port terminals & Container Freight Stations (CFSs).

DISCLAIMER

While every effort has been made to ensure the information in this publication is accurate, Nhava Sheva Customs does not accept any responsibility or liability for error of fact, omission, interpretation, or opinion that may be present, nor for the consequences of any decisions based on this

information. Any view or opinion expressed does not necessarily represent the view of Mumbai Customs Zone-II, Central Board of Indirect Taxes and Customs (CBIC) or Government of India.

While Nhava Sheva Customs has exercised all reasonable skill and care in preparation

of information in this report, it does not accept any liability in contract, or otherwise for any loss, damage, injury, or expense, whether direct, indirect or consequential, arising out of the provision of information in this report

ADDITIONAL COPIES, FEEDBACK AND CONTACT DETAILS

You can download this publication from www.jawaharcustoms.gov.in

If you wish to provide feedback, information and views that could be useful to this publication, please contact-

Deputy Commissioner, EDI,
NS-I Commissionerate,
Mumbai Customs Zone- II
Nhava Sheva, Raigad District.
Email:
edi@jawaharcustoms.gov.in

JAWAHARLAL NEHRU CUSTOM HOUSE

Time Release Study 2022



This page is intentionally left blank.

Table of contents

	Page No.
Message from Chairman, CBIC.....	ii
Foreword.....	iii
1. Executive Summary.....	1
2. About the Custom House.....	5
3. Objective of TRS 2022.....	6
4. Time release methodology and scope.....	7
Imports	
5. Import procedure in relation to release time.....	10
6. The Path to Promptness	14
7. BE with slower release times.....	15
Category wise Analysis	
8. Pre-arrival BE.....	16
9. On-arrival BE	17
10. Facilitated BE	18
11. Non-facilitated BE	19
12. Authorised Economic Operators (AEO)	22
Stage-wise analysis	
13. Submission to Assessment	23
14. Assessment to Goods Registration	26
15. Registration to CCV/Out of Charge	27
16. Time taken for duty payment	35
Exports	
17. Export procedure in relation to release time.....	36
18. Average Release Time & Distance covered to NTFAP target....	39
19. Time taken at individual stages.....	42
Appendix -1 Recommendations	45
Appendix -2	50
Annexure.....	51

Message from Chairman

Time Release Study (TRS) is one of the useful tools suggested by the World Customs Organization (WCO) for co-ordinated border management, based on comprehensive sample size, scope, methodology and stakeholder involvement, which assists Customs Administrations in desired policy initiatives to enhance trade facilitation. TRS is designed to assess the efficiency of the customs processes and measures the release time for various categories of cargo cleared through a customs formation.

Along with National TRS, TRS conducted at Zonal levels, is helpful in carrying out in-depth analysis of policy impacts and identification of areas for improvement with focus on factors specific to the Zones concerned.

I am happy to note that JNCH, Nhava Sheva has conducted the TRS 2022 along with National TRS.

Nhava Sheva Customs has been conducting time release studies since 2012 and has contributed to suggesting road maps for further improvements in Customs functioning. Consistent methodology adopted by gathering data of truly representative large sample size from diverse sources like different stakeholders and our partner government agencies and identifying & analysing outlier behaviour gives us a strong basis for further decision making. The decision of JNCH to conduct the entire study with in-house resources is reflective of the sense of ownership of the entire team in achieving the release time goal of 48 hours for import cargo and 24 hours for export cargo under the National Trade Facilitation Action Plan.

I compliment the JNCH TRS team for their efforts in this direction.

Vivek Johri
Chairman, CBIC

Foreword

While the release time of 3 minutes for the fastest Bill of Entry in this study shows us the dream benchmark, the slowest 30% Bills of Entry release time being more than 200 hours, presents before us an opportunity for going deep, identifying the hidden challenges and suggesting the way forward.

I am happy to place before you the Time Release Study (TRS) 2022 report of Jawaharlal Nehru Custom House, Nhava Sheva, Mumbai Customs Zone-II, with a promising result of an overall average release time for imports within revised NTFAP target of 48 Hours for the fastest 79.50 per cent of Bills of Entry.

This year's TRS was conducted during challenging times. Online system of goods classification codes was revamped w.e.f. 1.1.2022, the date co-terminus with the beginning of the study period of 7 days from 1.1.2022 to 7.1.2022. Notwithstanding such an important change coupled with challenges thrown out by ongoing pandemic, the TRS 2022 has indicated promising outcome. JNCH, a Customs house in Nhava Sheva sea-port handling the largest container traffic, has performed better in releasing the imported goods in the economy, with constant improvement over last few years. Consistent reduction in dwell time sends a very positive signal to all our trading partners across the globe as well as to the trade, showing reduction in time and cost to the trade, thus enhancing ease of doing business. By taking note of possible areas of improvements, I am sure, Team JNCH will continue to work relentlessly towards further improvement in release time so as to achieve the commitments made in the National Action Plan under the Trade Facilitation Agreement.

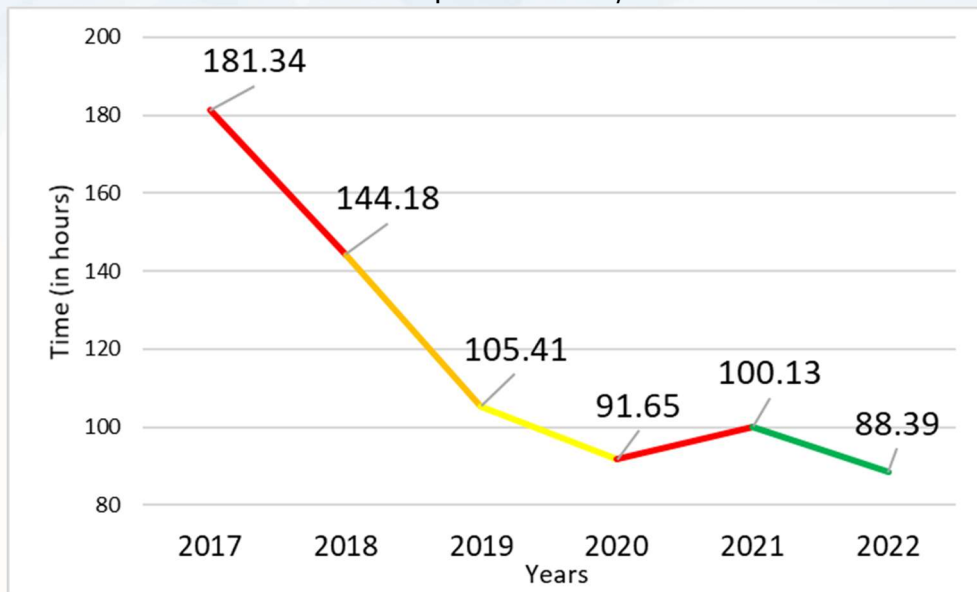
I wish to place on record my sincere appreciation to Shri Narendra Kulkarni, Commissioner, Shri K. Raguram, Joint Commissioner, Shri Subhash Chandra, Deputy Commissioner, Ms. Kanchi Gupta, Deputy Commissioner, Shri Jag Mohan Sagar, Appraiser, and to each of the officers involved in the TRS 2022, for their valuable contribution, collection of data, analysis and drafting this report in record time. I thank all the stakeholders for their enthusiastic participation and support in TRS process. I convey my sincere appreciation to the representatives of Participating Government Agencies, Customs Brokers, the Port authorities, CFS operators, and Shipping Lines who have volunteered to associate with the study so actively and provided required data/inputs.

Mohan Kumar Singh
Chief Commissioner, JNCH

1. Executive Summary of TRS 2022

- 1.1 The time release study was conducted on sample comprising bills of entry and shipping bills filed during 1st to 7th January 2022 for import and export at Nhava Sheva. The methodology and sample are same as that of National Time Release Study (NTRS) -2022; exclusions have been further trimmed as compared to NTRS-2021.

Chart 1: Import ART over the years



1.2 Average Release Time

Imports

88.39 hours compared with **100.13** hours in NTRS 2021

Exports

186.58 hours compared with **119.32** hours in TRS 2020

Sample Size & Exclusion

Imports

2021: 15152 BE analysed, 439 BE (**2.8** per cent) excluded

2022: 15191 BE analysed, 76 BE (**0.5** per cent) excluded

Exports

2021: 2439 SB analysed, 23497 SB filed (**89.6** per cent) excluded

2022: 9255 SB analysed, 26072 SB filed (**64.5** per cent) excluded

National Trade Facilitation Action Plan accomplishment

Imports

2022: **fastest 80** per cent of analysed BE (overall average release time)

45 per cent of analysed BE (individual release time)

2021: **fastest 65** per cent of analysed BE (overall average release time)

40.5 per cent of analysed BE (individual release time)

Exports

2022: **fastest 1.27** per cent of analysed SB

2020: **fastest 1.34** per cent of analysed SB

DPE/PP consignment

2022: **fastest 2** per cent of analysed SB

2021: **fastest 0.4** per cent of analysed SB

The fastest individual BE was observed with individual release time of 0.05 hours (three minutes). This illustrates the technical possibilities related to release time. The least fast BE in the category meeting NTFAP target has individual release time of 130.53 hours as compared with 110.22 hours in previous study of 2020.

1.3 Findings

Imports

- (a) The various categories of Importers and BE identified as 'path to promptness' in TRS 2019, viz AEO, DPD, regular importer, Advance BE, Facilitated BE, have achieved or are very near to achieving the NTFAP target. However, the ART for all imports together still stands substantially higher at 88.39 hours. Further improvement in release time therefore requires targeted interventions- we need to think "Beyond the Path to Promptness"
- (b) Pre-arrival processing of advance BE stands at a healthy 93.46%. However, only 41%

- advance BE are auto-regularised;
- (c) The time taken for assessment in on-arrival BE continues to delay the average release time.
 - (d) 93% of fastest fully facilitated BE & 90% of fastest facilitated BE have met NTFAP target. The delay in release time of outliers is substantial and requires targeted interventions.
 - (e) Time taken from Registration to Out of Charge measured only for those BE which should have moved the fastest in the sample stands at 70 hours pointing at a need to study CFS procedures (custodian), and deployment of human resources.
 - (f) Time taken for Faceless assessment (submission to assessment) is delayed substantially by instances of PUSH, PULL, RECALL which are remedies made available in the Faceless Assessment for exigent situations. Substantive delay is also accounted for by holidays, and restriction in working hours for FAGs.
 - (g) Substantial time of 22.72 hours is taken by trade for the stage between entry inwards or BE assessment, whichever is later, to Goods Registration which is delaying the release time of import cargo.
 - (h) In Pre-arrival BE, where assessment was completed before grant of entry inwards, goods registration was delayed also on account of regularisation of pre-arrival BE.
 - (i) BE involving PGAs on boarded on SWIFT have progressively bettered their release times, however further progress requires a paradigm shift in their regulatory process. PGAs issuing NOC on the basis of documentary check as against drawl of sample take lesser time in issuance of NOCs.
 - (j) Manual processes at TSK like defacement of COO are delaying release time.
 - (k) Query process by Out of Charge officer in RMS FC has delayed average time taken from Registration to CCV by 30 hours in 21 per cent of facilitated bills

of entry. Systemic changes can drastically trim this delay.

- (l) Since the end point of calculating average release time is OOC, delay in duty

payment in 18 per cent of total BE (duty paid 45 hours after CCV on average), which is not in Customs control is impacting ART negatively.

Exports

- (a) A large representative Sample size has been analysed for the first time in Export-TRS, 2022. Time stamps for goods arrival and final departure, required for analyzing export release time need to be gathered from multiple Custodians, and continues to pose a challenge.
- (b) Custodian time stamps pertaining to goods arrival and departure need to be integrated into ICES.
- (c) Average time taken from goods arrival to LEO of exports from PP is affected by

substantially higher release time of SB involving buffer storage, which arrived well ahead of vessel schedule.

- (d) The average time taken from goods arrival to LEO may be considered in order to judge efficacy of Customs clearance process. The average time taken from goods arrival to LEO is within revised NTFAP target of 24 hours of the fastest 96.51 per cent. of analysed sample of SB.

- 1.4 Analysis based recommendation made by TRS -2022 for achieving improvement in release time are listed in **Appendix-1**.

2. About the Custom House

- 2.1 The Custom House at Nhava Sheva caters to the clearance of export – import cargo at major port administered by the Jawaharlal Nehru Port Authority. The port was commissioned in 1988 as a single government-owned terminal, now has added four privately-operated port terminals for containerized cargo handling. It also has bulk liquid cargo handling facility. It ranks amongst the largest ports ranking in the top 30 global container ports.
- 2.2 The Custom House caters to a major percentage of India's containerized import - export cargo from the port.
- 2.3 Except when import cargo is delivered under DPD scheme¹, it is moved into 32 Container Freight Stations² (CFS) for carrying out controls and procedure by border management agencies including Customs.
- 2.4 Exports are handled using the CFS for containerisation of the cargo. In addition, sealed containers with export cargo arriving from the hinterland are processed on-wheel for clearance at export Centralised Parking Plaza³ as direct port entry (DPE)⁴.

¹ DPD scheme - upon obtaining customs out of charge the delivery of import container is made to importer who has taken registration at the port gate itself.

² CFS is a customs area set up as an extension of a customs station. It decongests the port.

³ Centralised Parking Plaza is a document processing area to facilitate Direct Port Entry for e-sealed containers for exports.

⁴ DPE process is the export equivalent of DPD. Under this, exporters' e-sealed containers need not be routed through CFS for seal verification and export permission is handled at the PP.

3. Objective of TRS 2022

- 3.1 India ratified the Trade Facilitation Agreement (TFA) of the World Trade Organization (WTO) in April 2016, aiming to expedite the movement, release and clearance of goods, including goods in transit and constituted National Committee on Trade Facilitation (NCTF) with representatives from government and private sector.
- 3.2 The objective under the National Trade Facilitation Action Plan (NTFAP) 2020-2023 to bring down overall cargo release time for imports has been changed from within 3 days for sea cargo to within 2 days, and for exports from within 2 days to within 1 day.
- 3.3 JNCH, Nhava Sheva is conducting this time release study⁵ with following objective: -
- to help present the effects of past measures having bearing on release time, and to identify further initiatives for improvement. Some such steps taken after the study of 2021 and others brought in till December 2021 are mentioned in **Appendix-2**.
 - to measure accomplishment during sample period vis-à-vis revised target under the NTFAP so that distance to be covered is known.
 - to estimate with precision, the time required for each intervening stage between arrival and release of the goods.
 - It also aims at highlighting the commitment of JNCH-Nhava Sheva and other trade stakeholders towards trade facilitation.

⁵ In addition to the national time release study, JNCH is conducting import TRS since January 2012, which can be accessed at. <http://www.jawaharcustoms.gov.in/index1.php>.

4. Time release methodology and scope

For Imports

4.1 Definition of Import Release Time: WCO TRS Guide Version 3 (2018) defines release time to measure the actual time required from the arrival of goods to their physical release. For Sea Cargo, arrival of goods is captured by time stamp relating to grant of Entry Inwards and physical release by time stamp relating to grant of Out of Charge (OOC).

- The release time is calculated for each BE⁶/SB⁷ separately and arithmetic average is taken to arrive at Average Release Time (ART).
- The definition of release time remains the same for Pre-arrival BE and On-arrival BE.
- In cases of AEO clients, eligible for deferred payment facility, the release time is calculated from entry inwards to the grant of out of charge by Customs.

The WCO TRS Guide Version 3 focuses primarily on "Clearance for Home Use" and "Transit", but may apply to any other Customs procedure, including "Exportation", "Warehousing" etc. As defined in the Revised Kyoto Convention (RKC), the term "release" means the action by Customs to permit goods undergoing clearance to be placed at the disposal of the person concerned. Therefore, the warehousing Bills of Entry are included in the study for calculating the average release time. The average release time of warehousing Bill of Entry is calculated as time taken between arrival of cargo to Out of Charge for In-bond Bill of Entry.

4.2 Scope of Import TRS covers BE filed from 1st January 2022– 7th January, 2022. TRS-2022 includes warehousing BE as well.

4.3 Exclusions:

- BE where out of charge was not granted on or before 07.02.2022.

⁶ Bill of Entry (BE) is a document required to be filed under section 46 of Customs Act, 1962 to make entry of imported goods.

⁷ Shipping Bill (SB) is an export declaration presented to Customs by the exporter under section 50 of the Customs Act, 1962 before goods can be exported out of the country.

- BE filed during the study period but relate to vessel granted entry inwards before 01.12.2021.

With statutory provision for fee for delayed filing of BE, there is unlikely to be such delays in filing BE. It may not be appropriate to exclude BEs that take time more than any specified period (taken as 720 hours in NTRS 2021).

- Ex-bond bills of entry.

4.4 Based on the above methodology, the steps taken to collect data for TRS 2022 are -

- BE filed during the sample period from 1st to 7th January 2022 were tracked till 7th February 2022.
- 15191 out of the 15433 BE filed during the sample period are analysed. 15152 out of the 15591 BE filed were analysed in NTRS 2021.
- 439 bills of entry (2.8 per cent) were excluded from the study in 2021. 242 bills of entry (1.5 per cent) were excluded⁸ from the study in 2022.

4.5 TRS 2022 has attempted to assess the impact of alternate quantification of release time detailed as under.

4.5.1 If the definition of dwell time is taken to be the average release time between entry inwards to CCV, it stands calculated at 78.83 hours as against the average release time for Nhava Sheva of 88.39 Hours.

4.5.2 Time taken between grant of entry inwards to berthing of the vessel/unloading of the cargo: Study of all the vessels berthing at JNPT during the sampling period, utilising the data from the Terminal Operating System (TOS) and customs IT system, to quantify the time taken

⁸ As spelt out in NTRS methodology, 17 BE pertaining to vessel granted entry inwards before 1st December, 2021, 225 BE not given out of charge upto 7th February 2022 and 1724 BE being ex-bond BE were excluded.

from actual berthing of the vessel till the grant of entry inwards was undertaken.

- 39 vessels berthed in JN Terminals between 1-7 January 2022.
- 28 vessels were granted entry inwards before berthing
- 11 vessels were granted entry inwards upon the berthing
- Negative 10 minutes is the Average time taken from the berthing of the vessel to grant of entry inwards, as against negative 24 minutes in 2019, and positive 31 minutes in January 2018.

For Exports

4.6 The scope⁹ of the present study has been expanded to cover all SB filed during 1-7th Jan, 2022 and given LEO upto 7th Feb, 2022.

4.7 Exclusions:

- Shipping Bills where LEO is not granted or vessel/aircraft has not departed, as the case may be, on or before 7th February, 2022.
- Shipping Bills filed but subsequently purged due to non-presentation of goods by the system.
- Where LEO is not granted / vessel not departed, as the case may be.

4.8 During the sample period, 26072 SB were filed. The study is based on 9255 SB out of the 26072 SB filed during the sample period. A total of 16817 SB (64.50 per cent.) are excluded as timestamps from custodian are not available for the study.

⁹ The study in 2018 was based on a sample of 199 SB pertaining to 6 types of goods exported under DPE from PP as FCL cargo by top 21 exporters. In the 2019 study, the SB processed through CFSs which included LCL cargo were included. The top 10 export goods included 5 of the previous study and 5 others with 760 SB involving top 71 exporters. The 2020 study retained the scope of 2019 study.

IMPORTS

5. Import procedure in relation to release time

- 5.1 The standard import clearance process begins with filing of the Import General Manifest¹⁰ (IGM) by the Shipping Lines and concludes with grant of out of charge.
- 5.2 The norm is the electronic BE which requires submission of import declarations along with self-assessment of duty liability and compliance of other non-fiscal regulations. The supporting documents are also electronically uploaded via **e-Sanchit**¹¹ facility.
- 5.3 Amendments in Section 46 of the Customs Act, 1962 introduced through the Finance Act, 2021 facilitate pre-arrival processing and assessment of Bills of Entry (BE) by mandating their advance filing thus leading to significant decrease in Customs clearance time. BE filed before entry inwards are referred to as **Pre-arrival BE**.
- 5.4 The BE filed on arrival of goods, that is, on grant of entry inwards or thereafter are described as **on-arrival BE**. The term used for on-arrival BE in earlier studies is normal BE.
- 5.5 Upon filing of BE by importer, the BE are processed by the Risk Management System (RMS) to specify the extent of facilitation or interdiction.
- 5.6 CBIC's **Risk Management System**¹² (**RMS**) aims to facilitate while ensuring compliance. The extent of such facilitation or interdiction considers the concerns of revenue as well as of government regulatory agencies. It too has bearing on release time.

¹⁰ IGM is document filed under section 30 of the Customs Act by shipping line giving details of cargo arriving at the port.

¹¹ E-Sanchit is an online facility provided for uploading the supporting documents with BE or shipping bill by importer or exporter.

¹² RMS is an IT driven system with primary objective to strive an optimal balance between facilitation and enforcement and to promote a culture of voluntary compliance.

- 5.7 Upon filing of self-assessed BE by importer, the BE are processed by the Risk Management System (RMS) to specify the extent of facilitation or interdiction.
- 5.8 If the RMS evaluates importer's self-declaration as acceptable, the BE is treated as **fully facilitated BE** and out of charge is given upon payment of self-assessed duties, and in a few select cases, after minimal documentary checks such as verification of a license or country of origin certificate. The fully facilitated BE involves neither verification of importer's self-assessment nor examination of goods. It receives quick clearance through the customs IT infrastructure.
- 5.9 Where the RMS requires that importer's self-declaration merits further scrutiny, it routes the BE for intervention. The level of interdiction is based on level of perceived risk. These levels add to release time and are broadly as follows –
- (i) verification of documents only, also referred as **second check without examination**. The RMS assists the officer in this verification by providing appraising instructions. At times, this process may involve the Customs Officer electronically seeking information or document from importer through **Query** which can be electronically replied and documents uploaded remotely by importer via the **e-Sanchit** module.

BE, either fully facilitated or subjected to second check without examination, are referred as **facilitated** BE as the goods are not imposed with any intervention.
 - (ii) verification of veracity of documents and partial or complete examination of the cargo upon assessment, also referred as **second check with examination**.
 - (iii) physical examination of cargo before completion of assessment, is also known as **first check**. This may also be applied by assessing officer including at request of importer who is unable to assess its

goods. Cases of import of second-hand goods, or where it is evaluated that there is more room for mis-declaration, attract first check. Thereafter, based on examination report and other relevant parameters like **test reports**, certificates etc. the assessing Group does the verification. In the case of the first check, the Customs duties are paid after these processes are over and out of charge is given by the Docks Officer.

- 5.10 The Indian **Authorised Economic Operator**¹³ (**AEO**) programme launched by CBIC in 2016 is under the aegis of WCO's SAFE Framework of Standards to secure and facilitate global trade.

It aims to enhance international supply chain security and to facilitate movement of legitimate goods. An entity engaged in international trade which is approved by Customs as being compliant with supply chain security standards is granted an AEO Status. The holder of such status has tangible benefits which include **facilitation** by priority in processing and clearance of goods.

From 2020 to 2022, AEO partners have risen from 3427 to 4421 in number, while such logistics operators rose from 762 to 903. During the study period, of the 4421 AEO partners, 56 have tier III status that provided maximum benefits, including deferred duty payment facility in which there is delinking of duty payment and customs clearance. There were 583 AEOs in tier II and 2879 AEOs in tier I.

- 5.11 Under **Direct Port Delivery (DPD)** scheme, upon obtaining customs out of charge the delivery of containerised cargo is made at port gate itself to importer, thus providing importer the flexibility in routing the container to any preferred location. By this way the scheme allows importer to consolidate further the gains from facilitation. Number of

¹³ AEO – They are entities engaged in international trade approved by Customs as compliant with supply chain security standards and granted certain benefits.

importers/exporters accorded DPD option, many of them *suo-moto*, has increased from 4443 in previous year to 5430 in 2022.

- 5.12 Regularity of import has been studied in the past in relation to release time with importers, who have filed seven or more BE during sample period, being categorized as regular importers and others as non-regular importers. There were 320 regular importers and 5771 non-regular importers segregated by this method.
- 5.13 In many instances, clearance of import cargo is dependent upon role of **other government agencies** such as the plant or animal quarantine authority, the FSSAI, Drugs Controller from where a report or NOC is required. CBIC's Single Window Interface for Facilitating Trade (**SWIFT**)¹⁴ has presently brought six Participating Government Agencies (**PGA**)¹⁵ onto a single platform that has documentation facility coupled with common RMS. These aspects too have bearing on release time.

¹⁴ SWIFT – a programme which enables importers/exporters to file a common electronic 'Integrated declaration' compiling information for customs and all PGAs. It replaces nine separate forms required by these 6 PGAs and Customs.

¹⁵ PGAs - These are specialized bodies due to their expertise in a particular field or due to them being the empowered agency under a statute to regulate the import of specified goods.

6. The path to promptness

Pre-arrival BE, enhanced level of facilitation associated with AEO status holders or importers utilising DPD scheme have been described in TRS-2020 as the Path to Promptness. The outcomes of the study for these BEs or importers are encouraging and as given below –

Table 1: BE on path to promptness

Nature of BE or Importer	%age share in total		%age facilitation level		ART in hours		%age share that meets NTFAP target		
	Year →	2020	2022	2020	2022	2020	2022	2020	2022
Pre-arrival BE		69.45	87.64	78.18	81.27	78.46	61.87	83.58	94.64
Fully facilitated BE		57.64	65.38	100.0	100.0	67.57	65.58	90.29	93.07
Facilitated BE		75.16	79.75	100.0	100.0	80.90	71.07	85.24	90.39
AEO importer BE		52.65	28.80	88.7 ¹⁶	94.95	74.34 ¹⁷	50.77	87.52	99.37
DPD importer ¹⁸ BE		53.17	57.14	84.78	86.61	77.69	63.43	84.71	94.25
Regular importer ¹⁹ BE		34.27	38.98	88.67	90.24	69.43	54.61	90.43	98.01

Chart 2: ART of BE on path to promptness

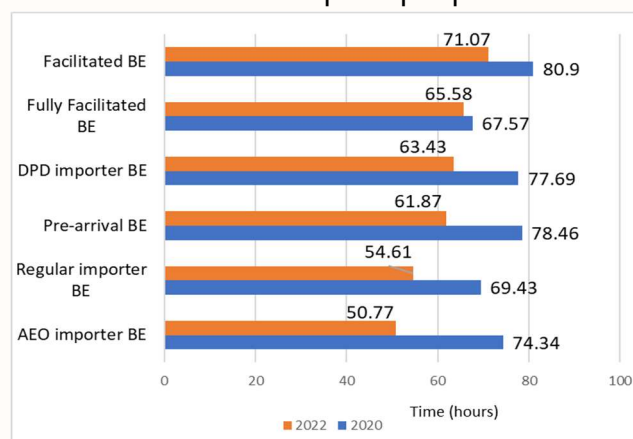
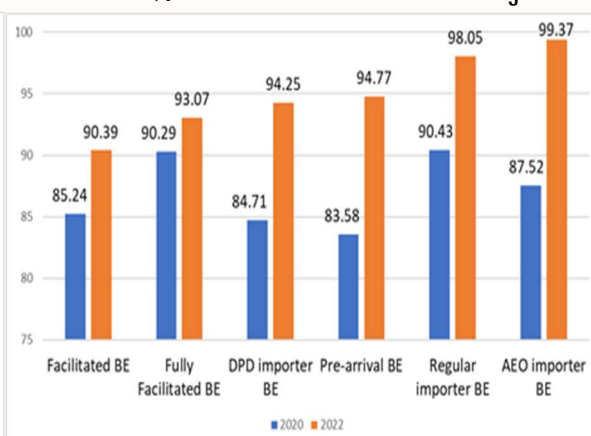


Chart 3: % of fastest BE that meet NTFAP target



Recommendation 1

Faster ART can be achieved by continuing outreach to stakeholders by increasing share of Pre-arrival BE beyond current 87.64 per cent., and, raising coverage of AEO programme and DPD scheme from present level.

¹⁶ AEO BE full facilitation level – 84.5 per cent. in 2019 and 75.35 per cent. in 2020, 83.08 per cent in 2022. Overall full facilitation level 58.1 per cent. in 2019 and 55.76 per cent. in 2020, 65.38 per cent in 2022.

¹⁷ Non-AEO importer BE – ART 81.66 hours in 2022 vis a vis 113.51 hours in 2020 and 123.24 hours in 2019.

¹⁸ Share of AEO BE in DPD BE is 82.9 per cent. 2020 study and 88.62 per cent in the present study.

¹⁹ The previous studies also categorise BEs as filed by regular importers who are taken as those who filed seven or more BEs during the sample period. BASF India Limited was regular importer with highest number of BE filed, 99.38 per cent. being Pre-arrival BE.

7. BE with slower release times

7.1 The comparative performance of the slowest BE stood as follows –

Table 2: Slowest BE			
ART in hours			
Bills of entry	Year 2019	Year 2020	Year 2022
slowest 01 per cent.	719	602	657
slowest 05 per cent.	465	392	423
slowest 20 per cent.	275	235	248
slowest 30 per cent.	226	196	203

7.2 1064 (7%) BE with release time higher than 245.7 hours are identified as outlier on the basis of Five-Number Summary method. The ART of these 1064 BE is 377.15 hours against ART of 66.64 hours for rest of the 14128 BE.

7.3 Out of 1064 BE, 44 fully facilitated BE with ART of 391.13 hours did not involve any of the factors like PGA NOCs, SCAN EIR, COO defacement, OTP Verification, and Amendments, but delayed on account of late goods registration and duty payment by the respective Importer/CB. Rest of the BE involved one or more of the factors, and were cleared with ART of 376.57 hours. Detailed analysis is presented in Stage wise Analysis.

7.4 The broad categories of BE with longer ART were the same as in previous years.

Table 3: BE with longer average release time								
Nature of BE or Interdiction or Importer	%age share in total	%age share in total	%age facilitation level 2020	%age facilitation level 2022	ART in hours 2020	ART in hours 2022	%age that meets NFTAP target 2020	share meets 2022
	Year →	2020	2022	2020	2022	2020	2022	2020
On-arrival BE	30.55	12.36	68.31	68.93	125.68	171.21	34.82	35.31
Query in assessment BE	4.33	10.67	51.43	35.34	155.37	166.17	25.69	47.64
2 nd check exam. BE	22.20	18.39	-	-	133.67	146.50	14.39	15.82
1 st check exam. BE ²⁰	3.0	1.85	-	-	212.42	256.88	1.14	1.77
Non-regular importers ²¹ BE	65.72	61.02	68.12	73.05	105.12	84.05	58.59	82.19

²⁰ 1st check examination is done for both policy and duty reasons such as valuation including for second hand machinery, classification and process for detection of hazardous dyes especially in textiles, re-imports, to check for concealment or security purposes.

²¹ 9270 non-regular importers' BE as compared to 5771 non-regular importers' BE in 2020

CATEGORY WISE ANALYSIS

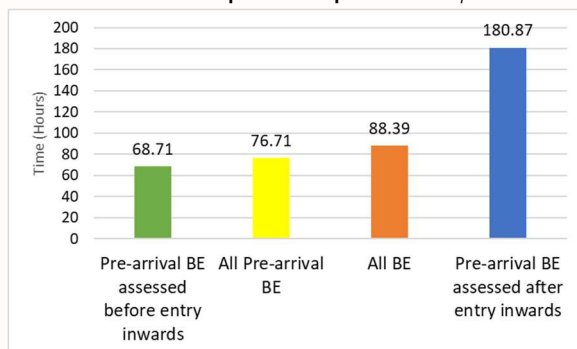
8. Pre-arrival BE

8.1 Amendments in Section 46 of Customs Act, 1962 introduced through Finance Act, 2021 facilitate pre-arrival processing of BE by mandating advance filing to decrease clearance time. 13314 BE (87.64 percent) were filed on an average 116:06 Hours (5 days) before grant of entry inwards.

Table 4: Pre-arrival BE assessment

BE Category	Number (%age share in total)
Pre-arrival BE assessed before entry inwards	12193 (80.26)
Pre-arrival BE assessed after entry inwards	1121 (7.37)

Chart 4: ART of BE processed pre-arrival v/s other



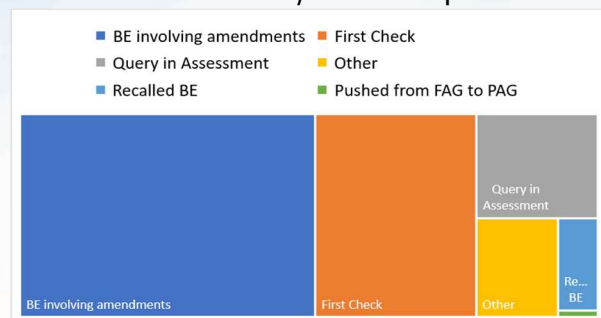
- ✓ In 91.5% pre-arrival BE assessment was completed on an average 128 hours before grant of entry inward translating to better release time.

Recommendation 2:

Improving adoption of online amendment by continuing outreach to stakeholders, especially Customs brokers. Auto-regularisation of Pre-arrival BE by Customs Officer to be discouraged and done only in exceptional cases and not as a matter of routine.

- In remaining 1121 BE, assessment was completed on an average of 111:42 hours after grant of entry inward. The reasons for delay in release of these BE are mapped below-

Chart 5: Reasons for delay in release of pre-arrival BE



8.2 Pre-arrival BE is regularised through 3 modes when entry inward is granted-

- Auto-regularised by ICES
- Online amendment
- Regularised by Customs Officer

Table 5: Regularisation of pre-arrival BE

Mode of Regularisation	Number (%age of Pre-arrival BE)	%age of Pre-arrival BE assessed before entry inwards
Auto Regularised	5568 (41.82)	90.88
Online Amendment	4311 (32.27)	95.54
Regularised by Officer	3435 (25.79)	95.02

9. On-arrival BE

9.1 1877 on-arrival BE were filed on an average of 45:42 Hours after the grant of entry inwards and their release time was 171:13 Hours. An average of Rs. 23626/- was levied as late filing charges.

9.2 If Average Release Time for these 1877 BE is calculated as time taken between BE filing to out of charge then their ART stands at 125.46 hours. It is desirable that all importers are nudged to file pre-arrival BE rather than on-arrival BE, so as to better the average release time.

9.3 It was also observed that in this category, registration of goods was delayed on an average of 47 hours, and duty payment by 20 hours from CCV.

Delay in filing on-arrival BE from entry inwards



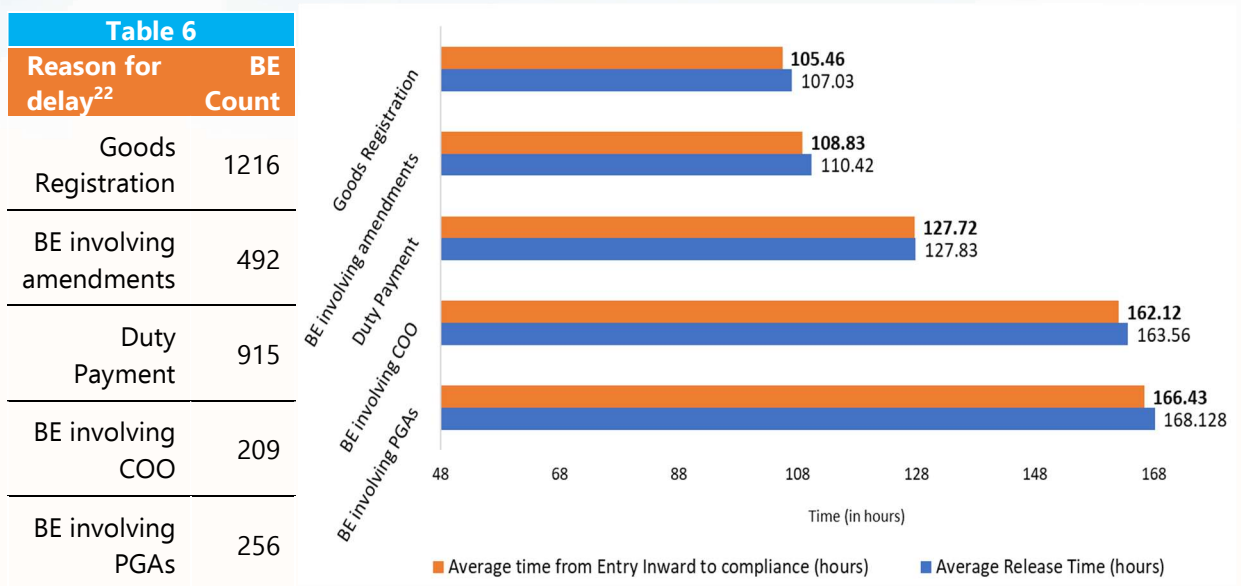
Recommendation 3

CBIC may consider increase in late filing charges or levying graded late filing charges to nudge Importers to file pre-arrival BE.

10. Facilitated BE

- 10.1 9932 BE (65.38%) were fully facilitated with ART of 65:35 hours.
- ✓ 9244 BE (93 per cent) of fastest fully facilitated BE were cleared on an average of 47.15 hours, thus achieving NTFAP target.
 - ✓ 5726 (61.94 per cent) fully facilitated BE had individual release time within 48 hours.
 - The reasons for delay in release time beyond 48 hours of 4206 fully facilitated BE were analysed –

Chart 6: ART v/s Time for compliance in fully facilitated BE



Other than above reasons, it was observed that BE movement was impeded by manual verifications involving Import of Goods at Concessional Rate of Duty (IGCRD), and certificates from other government departments.

Analysis shows that queries by OOC Officer seeking PGA/COO defacement/SCAN EIR played a compounding effect on delay in release time.

- 10.2 During the sample period, 12115 BE (79.75%) were facilitated BE with average release time of 71:04 hours.

Of these 12115 BE, 2183 BE were **second check BE without examination** with average release time of 96.01 hours.

²² Reason was assigned by identifying compliance time stamp occurring within 6 hours to OOC.

11. Non-facilitated BE

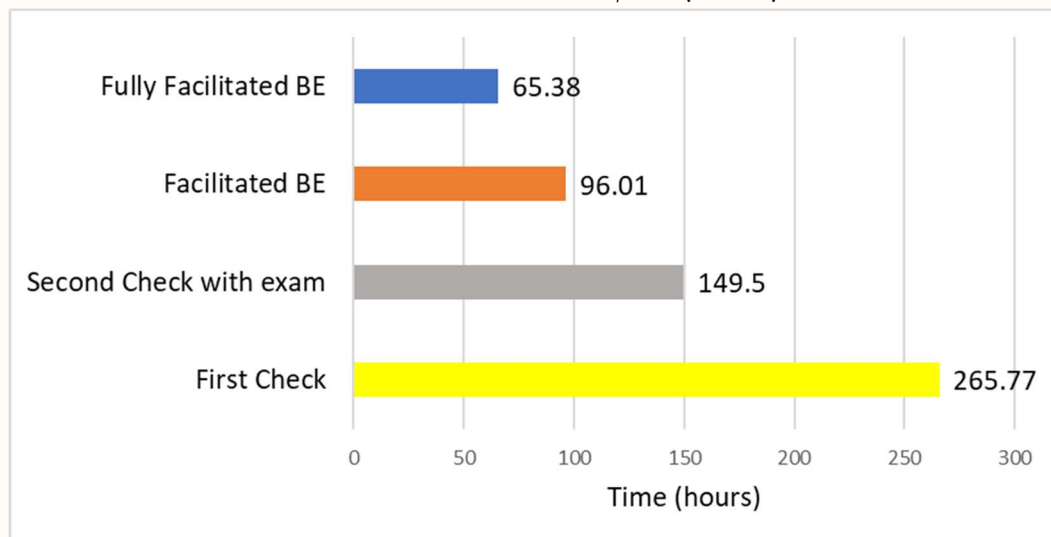
- 11.1 Verification of veracity of documents and partial or complete examination of the cargo upon assessment, is also referred to as **second check with examination**

During the sample period, 2794 BE (18.39%) were subjected to Second Check process with examination their average release time being 149.50 hours.

- 11.2 Physical examination of cargo before completion of assessment is also known as **first check**, which may be resorted to by assessing officer including at request of importer who is unable to assess their goods. Thereafter, based on examination report and other relevant parameters like **test reports**, certificates etc. the assessing Group does the verification.

During the sample period, 282 BE (1.86%) were subjected to first check process and their average release time was 265.77 hours. The fastest BE in this category was cleared within 25.15 Hours from the grant of entry inwards.

Chart 7: Level of facilitation v/s ART (in hours)



11.3 **CFS wise performance in clearance of Non-Facilitated Bills of Entry:**

11.3.1 Examination and subsequent OOC of non-facilitated BE are undertaken in 32 CFSs of Nhava Sheva. The subprocess in CFS include seal cutting, container landing, destuffing, invoicing and payment for CFS services, issuance of delivery order etc.

11.3.2 The release time between registration to out of charge in respect of second check BE involving examination matching the following criteria²³ was calculated for all CFS.

- not involving PGA NOC,
- not involving scanning hold
- not involving COO defacement
- assessed before entry inwards
- if involving amendment, then amended before registration
- duty paid before CCV

11.3.3 In this manner 938 BE with average time of 70.71 hours taken from registration to out-of-charge cleared through 30 Nhava Sheva CFSs were taken for further analysis. The ART for these BE was 110.04 hours which includes 39.34 hours taken from entry inward to registration.

- ✓ in 7 CFS the average time taken from Registration to Out of Charge was under 48 hours.

-in 23 CFS the average time taken from Registration to Out of Charge was more than 48 hours.

- ✓ 576 BE out of 934 BE were FCL cargo wherein time taken from registration to out of charge was 59.34 hours. The ART for these BE was 100.10 hours which includes 40.76 hours taken from entry inward to registration.

²³ No further allowance has been made for nature of commodity, readiness of importer, distance from Port, working strength of officers etc

- 361 BE out of 934 BE were LCL cargo wherein time taken from registration to out of charge was 88.89 hours. The ART for these BE was 125.89 hours which includes 37.00 hours taken from entry inward to registration.

Recommendation 4

- (a) CFSs to be encouraged to migrate their following processes online for speedy operation, greater convenience to trade, and so that time stamps are available for comparative study.
- Request for container grounding & destuffing
 - Request for seal cutting
 - eInvoicing, ePayment
 - eDelivery Order based on Customs OOC communicated online.
- (b) Multi-stakeholder application already introduced on pilot basis where Customs, Custodians, Customs Brokers/importer are on the same platform having a shared view of scheduling examination of goods may be rolled out for all customs formations. This initiative will ensure fullest transparency alongside of convenience for trade and other stakeholders.

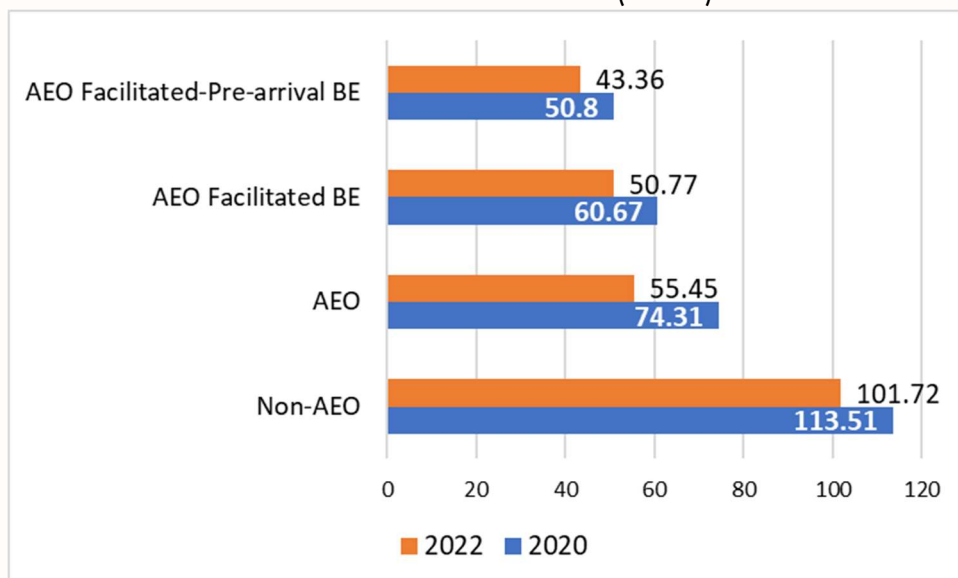
12. Authorised Economic Operators (AEO)

- 12.1 710 AEO importers filed 4376 BE which were cleared with ART of 55.45 Hours as compared to ART of 101.72 hours for non-AEO importers' BE.
- 12.2 Of the 4376 AEO BE, 3639 BE (83%) were fully facilitated and cleared with average release time of 47.28 Hours as compared to average release time of 76.16 Hours of non-AEO BE (6293 BE).

Category of BE	Number of BE		ART (in hours)	
	2020	2022	2020	2022
Non-AEO BE	6476	10815	113.51	101.72
AEO BE	All AEO BE	4376	74.31	55.45
	Facilitated BE	5441	60.67	50.77
	Facilitated-Pre-arrival BE	4172	50.8	43.36

- 12.3 The distance covered to NTFAP target was 100% in respect of AEO fully facilitated Bills of entry. The distance covered to NTFAP was 100% in Facilitated-AEO-Pre-arrival BE as compared to 98% in 2021.

Chart 8: ART of AEO BE and Non-AEO BE (in hours)



STAGE WISE ANALYSIS

13. Submission to Assessment

- 13.1 Under Faceless Assessment Scheme, BE identified for verification are now allotted to Faceless Assessing Groups (FAG) across the nation for anonymous, contactless and paperless verification.
- 13.2 In the study, 4999 BE underwent verification process and were assessed in an average of 57.77 hours from submission. The comparative average time taken by 4999 BE in this stage at FAG and PAG is mapped below –

Table 8: BE Submission to Assessment						
Category of BE	Faceless Assessment Groups			Port Assessment Groups		
	At INNSA1	Other than INNSA1	Total	Pushed ²⁴ to PAG	Pulled/ Recalled BE	Total
All BE (Average Time)	1018 (40.17)	3600 (46.75)	4618 (45.71)	109 (225.3)	272 (200.23)	381 (207.7)
2 nd Check BE	All BE (Average Time)	956 (25.70)	3418 (35.15)	4374 (33.24)	81 (163.26)	343 (197.96)
	BE not invl. query ²⁵ (Average Time)	837 (16.26)	2248 (11.69)	3085 (12.94)	13 (111.83)	212 (169.01)
	BE invl. queries (Average Time)	119 (92.11)	1170 (80.81)	1289 (81.85)	68 (173.09)	131 (289.42)
	BE invl. only queries (Average Time)	52 (53.38)	485 (47.76)	537 (48.30)	24 (131.86)	32 (219.96)
	BE invl. queries and amendments (Average Time)	67 (122.51)	685 (104.21)	752 (105.82)	44 (195.58)	99 (299.53)
1 st Check BE (Average Time)	62 (272.05)	182 (260.88)	244 (263.72)	28 (404.75)	10 (259.94)	38 (366.64)

Time in hours

²⁴ Faceless Assessment reform is implemented with the flexibility of push and pull BE from FAG to PAG to deal in exceptional circumstances.

²⁵ Queries are raised online to Importers for seeking additional/deficient information/documents requisite for assessment/compliances.

13.3 1420 Second Check BE involving queries are further categorized as below:

Table 9: Impact of queries in assessment							
2 nd Check BE invol. queries		Faceless Assessment Groups			Port Assessment Groups		
		At INNSA1	Other than INNSA1	Total	Pushed to PAG	Recalled BE	Total
Single Query	Count of BE	108	979	1087	29	55	84
	Average Time for query reply	45.89	42.15	42.52	39.18	52.50	47.91
	Average Time: submission to assessment	79.65	67.79	68.97	129.65	283.17	230.17
Multiple Query	Count of BE	11	191	202	39	8	47
	Average Time for query reply	193.08	117.9	122.07	148.35	99.61	140.06
	Average Time: submission to assessment	214.41	147.51	151.16	205.39	332.37	227.01

Time in hours

13.4 Of the 4999 BE, 3297 BE were assessed without queries in an average of 28.10 hours. Analysis of these 3297 BE, revealed that while 2222 BE were assessed on the same day with average time of 1.63 hours, the rest 863 BE took 42.02 hours from their filing to assessment. Out of these 863 BE, 703 BE could be assessed the next day as they were filed during non-working hours between 18:00 Hours and 01:00 Hours. Rest of the 160 BE could be assessed on the second day from filing due to holiday occurring between.

Recommendation 5

- (a) National Assessment Centres may issue National Assessment Guidelines with a view to rationalise examination orders, monitor instances of PUSH & PULL of BEs and Queries
- (b) CBIC may consider the functioning of FAGs on 24x7 basis by keeping some of the Assessment Centres in the country active during night & on holidays, after adequate provisioning of manpower.
- (c) CBIC and DG systems may consider treating BE waiting in the que of FAG, but pending completion of appraisal resulting in either a due examination order or query, as 'BE not attended to during working hour' and auto-queue those BE in another Faceless Assessment Group that may be active in subsequent hours.

- (d) Data quality in declarations and self-compliance will mitigate the queries in assessment. The outreach programmes to trade are key to achieve the requisite quality.
- (e) Amendment module in ICES may be comprehensively overhauled to que amendment requests, allow raising queries on amendment request, receive supporting documents and replies on eSanchit, enable viewing document status and declared particulars from same window as amendment module.
- (f) Implementation of CBIC circular 14/2021 dated 07.07.2021 regarding routing of first check BE directly to shed/dock officers would contribute substantially to reducing release time of first check BE.

14. Assessment to goods registration

- 14.1 Goods registration²⁶ of 14748 BE (97%) was done online by Importer/CB.
- 14.2 In 12193 Pre-arrival BE, where assessment was completed on an average of 116 hours before grant of entry inwards, goods registration was done on an average of 19.47 hours after regularisation, while the delay in registration calculated from entry inwards stands at 33.69 hours. The difference is also attributable to time taken in regularisation of pre-arrival BE.
- 14.3 The impact of delay in registration on ART of different categories of BE is mapped below –

Table 10: Delay in goods registration						
	Fully Facilitated BE		Facilitated BE		Second Check BE	
	Pre-arrival BE	On-arrival BE	Pre-arrival BE	On-arrival BE	Pre-arrival BE	On-arrival BE
ART	57.03	140.81	61.89	147.96	132.21	206.85
Delay in goods registration ²⁷	18.46	47.31	18.56	45.16	26.47	36.89
Count of BE	8918	1014	10821	1294	2259	535
Weight of delay in overall ART	12.26	3.5	14.96	4.35	4.45	1.47

- 14.4 Delay in registration of Facilitated BE is one of reasons which prolong their ART. The fruits of early registration need to be reaped at least in Facilitated BE to further reduce overall ART.

Recommendation 6

- CBIC may consider auto-registration of facilitated BE for Customs Compliance Verification (CCV) to better their ART.
- Auto-regularisation of BE should improve beyond 41.82 percent to reduce delay in ART on account of time taken for BE regularisation

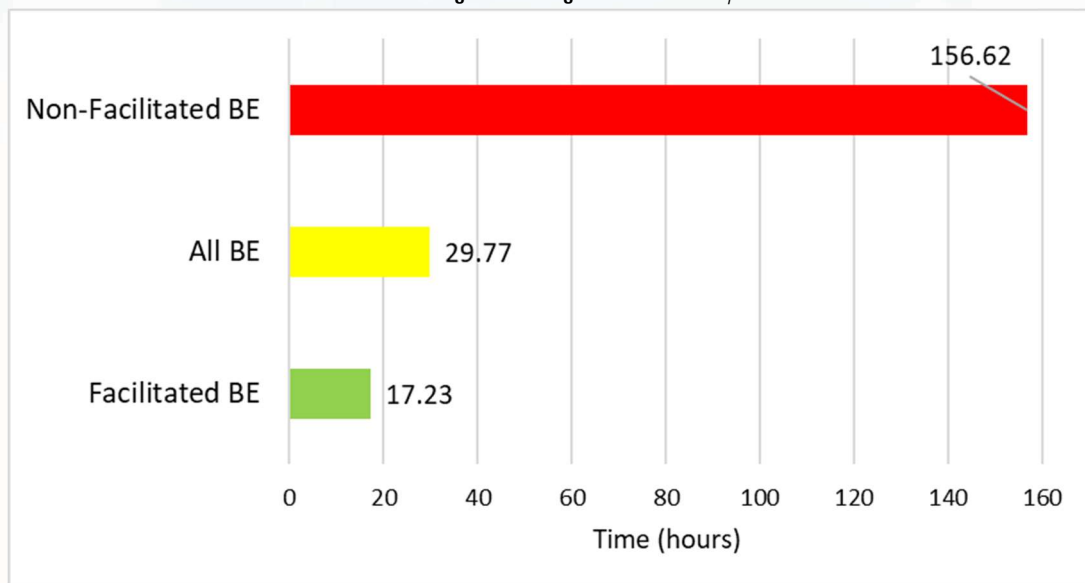
²⁶ Completion of assessment and regularisation of pre-arrival BE are the two pre-requisites for online goods registration of second check BE. The former is the only pre-requisite in case of On-arrival Second Check BE and the latter is the only pre-requisite in case of Pre-arrival First check BE.

²⁷ Delay is calculated as time taken from assessment or entry inwards, whichever is later, to goods registration.

15. Registration to CCV/out of charge

- 15.1 After goods registration, BE is routed for Customs Compliance Verification (CCV)²⁸.
- 15.2 Non-facilitated BE took substantially more time to travel from Registration to CCV/OOC, as examination of goods is carried out in this stage–

Chart 9: Average time: registration to CCV/OOC



- 15.3 The following factors prolong the time taken from Registration to CCV-
- (i) PGA NOCs
 - (ii) Defacement of COO certificate
 - (iii) Scanning Report (Scan EIR)
 - (iv) Verification of OTP (deferred duty cases)
 - (v) Query by OOC officer
 - (vi) System Alerts

These factors may be at play individually or severally for a BE.

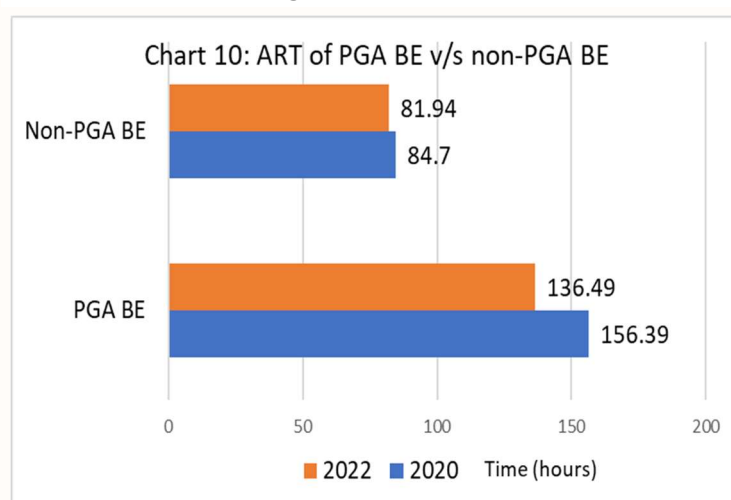
²⁸ Board's Circular No 05/2020-Customs dated 27.01.2020 extends facility of automated clearance of Bills of Entry wef 05.03.2020. CCV can be completed even while duty has not been paid. On completion of verifications, the proper officer of customs, on satisfaction that the goods are ready for clearance, will confirm completion of CCV for the particular BE in Customs System. On completion of CCV & subsequent payment of duties, Customs system automatically generates online OOC.

PGA NOC

15.3.1 PGA NOC prescribed in 1796 BE were analysed -

Table 11: Average release time of PGA BE				
Nature of BE	%age share in total BE (number)		ART in hours	
	2020	2022	2020	2022
PGA BE	11.4 (1562)	11.8 (1796)	156.39	136.49
Non-PGA BE	88.6 (12116)	88.18 (13395)	84.7	81.94
PGA advance BE	07.86 (1076)	10.22 (1553)	148.3	121.28
PGA facilitated BE	08.34 (1141)	9.61 (1460)	143.99	126.30
PGA AEO BE	04.52 (618)	2.23 (339)	134.97	82.96
PGA on-arrival BE	03.55 (486)	1.59 (243)	174.23	233.72
PGA non-facilitated BE	03.07 (421)	2.21 (336)	189.98	180.77
PGA Non-AEO BE	06.90 (944)	9.59 (1457)	170.4	148.94
C Drugs SCO BE	02.68 (367)	4.77 (726)	59.10	84.69
Wildlife CCB BE	00.00 (1)	0.06 (10)	84.37	155.42
Animal QCS BE	00.18 (25)	7.31 (111)	101.49	154.18
Plant Quarantine Dir. BE	04.85 (664)	3.67 (557)	181.12	168.73
FSSAI BE (NOC issued online)	01.79 (240)	4.52 (687)	192.56	180.48
FSSAI BE (incl. manual NOC)	03.18 (436)	0.47 (71)	201.01	124.79
Textile Committee (TC) all BE	00.53 (73)	0.24 (36)	169.70	169.29
TC BE cleared on final test report	00.15 (21)	0.00 (4)	286.27	392.85

The BE associated with PGAs have traditionally held longer release times. The above data, as also its comparison with data in Table 1, indicates that attributes of being pre-arrival/facilitated/AEO BE have a diminished



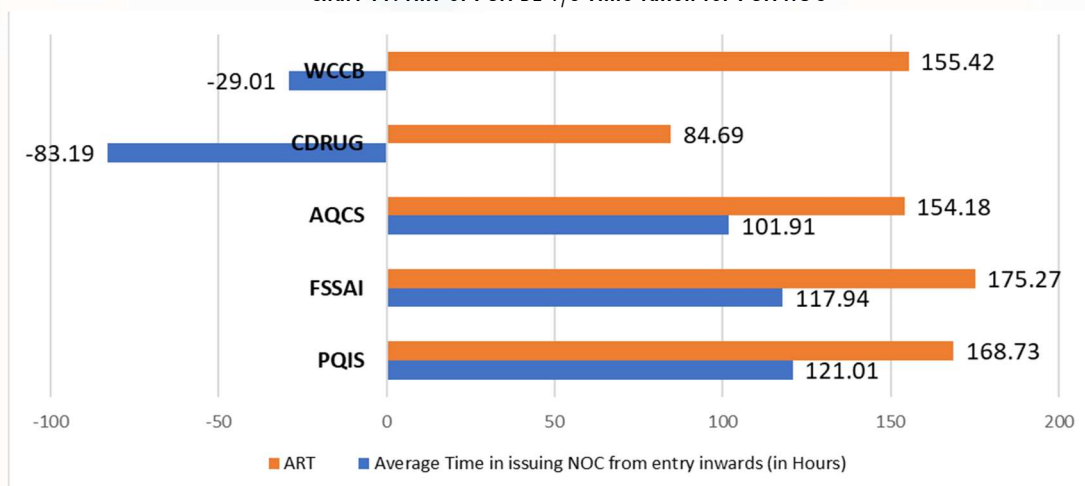
contribution when associated with most PGAs. There is considerable 11.8 per cent. weight of PGA BE in the sample. Hence, their release time would assist in crossing the distance to the target.

The average time taken by PGA in issuing NOC calculated as time taken from BE filing or Entry inwards, whichever occurs later is as below:

It was observed that BE involving PGAs onboarded on SWIFT have progressively bettered their release times. It was found that PGAs issuing NOC on the basis of documentary check as against drawal of sample take lesser time in issuance of NOCs.

Table 12: PGA NOC – Time taken			
PGA	Count of BE	Avg. Time for NOC from entry inwards	ART (hours)
WCCB	10	-29.01	155.42
CDRUG	726	-83.19	84.69
AQCS	111	101.91	154.18
FSSAI	758	117.94	175.27
PQIS	557	121.01	168.73

Chart 11: ART of PGA BE v/s Time taken for PGA NOC



726 BE involving CDRUG were taken up for detailed analysis to identify the reason for their delayed release.

Table 13: BE involving CDRUG NOC						
Type of BE involving CDRUG NOC	BE Count	Avg Time: entry inwards to NOC	Avg time: entry inwards to assessment	Avg time: entry inwards to registration	Avg Time: Registration to CCV/OOC	ART
All BE	726	-83.19	-	-	23.30	84.69
Facilitated	652	-	-105	53.95	14.23	74.89
Fully Facilitated	509	-	-123.89	47.64	12.96	65.64
Non-facilitated	74	-	-12.95	67.08	103.21	170.57

Time in hours

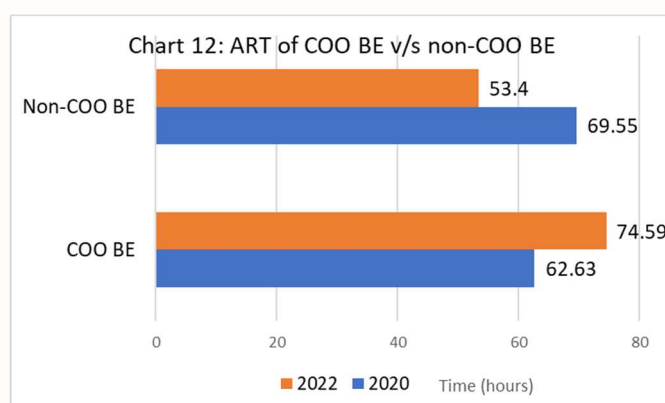
It was observed that the benefit of advance filing in 659 instances has converted to expedited NOC issuance from CDRUG. In facilitated BE involving CDRUG NOC, the delay is majorly on account of delay in registration of goods by the importer. In non-facilitated BE, the delay in release is on account of delay in registration as well as time taken for examination.

Recommendation 7

- (a) PGA may consider moving to pre-import checks, operationalized in a manner similar to BIS compliance requirements on import, as against the present norm of post-import checks
- (b) Plant Quarantine, FSSAI and Textile Committee may review and re-orient their internal functioning framework in terms of staffing, infrastructure and office location etc to specifically cater to the requirements for larger ports like Nhava Sheva
- (c) Every PGA to ensure NOC only by electronic message exchange to save time, including time taken for linking report with BE.

Defacement of COO certificate

15.3.2 Turant Suvridha Kendra (TSK), as a dedicated cell, have been set up to cater to functions like acceptance of Bond and Bank Guarantee (BG) and debit the same, carry out any other verification of documents etc., that may be referred by Faceless Assessment Groups, defacing of documents/ permits/ licenses/ certificates, debit of documents/ permits/ licenses/ certificates



etc, and other functions determined by the Commissioner to facilitate trade.

Comparison is made within the broad category of facilitated BE not involving

PGA, of BE with COO requirement and those not involving COO certificate. Time taken by Importer/CB to deface the COO certificate, from the later of the two events Entry inward & BE filing, is seen to be higher.

Recommendation 8

- (a) Implementation of CBIC circular 14/2021 dated 07.07.2021 regarding anonymized escalation of trade grievances on pending BE would contribute in reduction of release time.
- (b) Electronic filing and debit of Licenses, Permits, Certificate, Other approvals (LPCO) from other agencies, may be made mandatory for submission of BE. Self-assessment by importer cannot be said to be complete until all mandated debit, verification and upload of LPCO is completed. Therefore, it is only reasonable to mandate that all debit is carried out before BE submission.
- (c) It is recommended that government may consider replacing the present framework/arrangement of honouring preferential imports at ports (involving production of physical paper COO certificates and their verification/debiting at time of import) with electronic exchange of documentation to achieve a paperless clearance.
- (d) It is recommended that government may consider introducing electronic means of submitting bond and bank guarantee
- (e) It is recommended that different regulatory agencies be given access on ICEGATE for the purpose of generating/issuing certificate in an agency-wise specified format. Upon generation of such certificate with an IEC No. etc, a unique ID may get associated, which would get quoted in the BE for which a specific field needs to be provided, thereby enabling ICES to electronically verify.
- (f) A similar process may also be considered for the purpose of specific import license/original NOC from BIS, Rubber Board, RNI, CBN etc.

Scan EIR integration with ICES

15.3.3 In TRS 2020, it was decided to adopt the tool whereby BE that should normally be moving without any hinderance are identified and then a common factor that may be causing larger time taken is attempted to be identified.

9084 facilitated BE were shortlisted in TRS 2022 which were not associated with factors such as country of origin certificate, or partner government agency or requiring certificates such as for import of goods at concessional rate of duty. It was found that these BE took average 9.15 hours from registration to OOC, but for a segment consisting of 851 BE involving container scanning based on RMS selection, this time stage averaged 38.59 hours as against 29.94 hours in 2020. All the scan reports were of clean image.

It was noticed that after entry inward containers are selected and sent to Container Scanning Division (CSD) where, upon scanning, a Scan EIR (equipment interchange report) is made with either a clean image stamp or otherwise. The individual Scan EIRs are collected manually from the CSD and then presented through e-Sanchit or at the relevant location for out of charge.

Since, clean Scan EIRs imply absence of examination of the goods, it is deduced by elimination that the process of communication of Scan EIRs contributes partly to higher release time.

Recommendation 9

It is recommended that to better release time, the scanning output be integrated with ICES, so that the officer at the RMS facilitation centre/docks/terminal gates can act without requirement of the copy of physical scan EIR.

Queries by OOC Officer

15.3.4 ICES provide an option to OOC Officer to raise query to the importer/CB for non-compliance of PGA NOC, COO defacement, SCAN EIR, System Alerts, OTP Verification (deferred duty cases) etc. The impact of queries raised by OOC officer on facilitated BE was analysed.

Chart 13: Impact of queries on time taken for registration to CCV

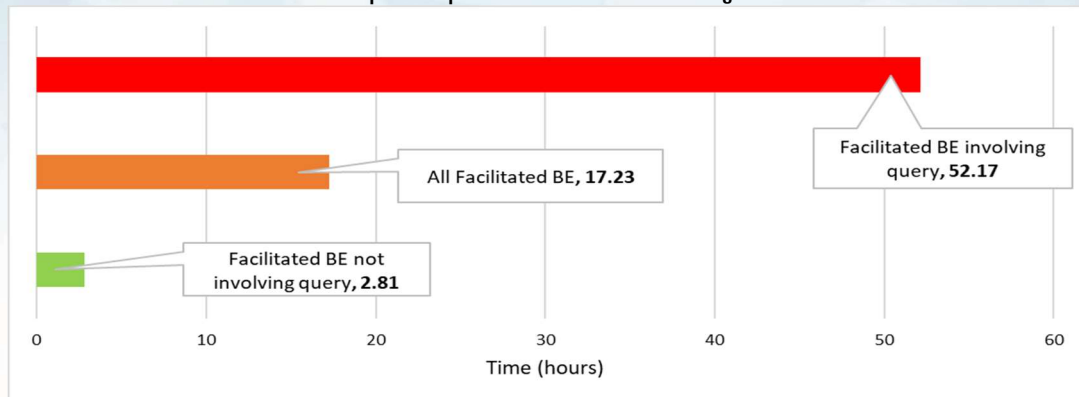


Table 14: Impact of queries

BE Category	Number (%age of total BE)	Time taken registration to CCV (hours)
Facilitated BE	12115 (79.75)	17.23
Facilitated BE involving query	3214 (21.15)	52.17
Facilitated BE not involving query	8901 (58.59)	2.81

Recommendation 10

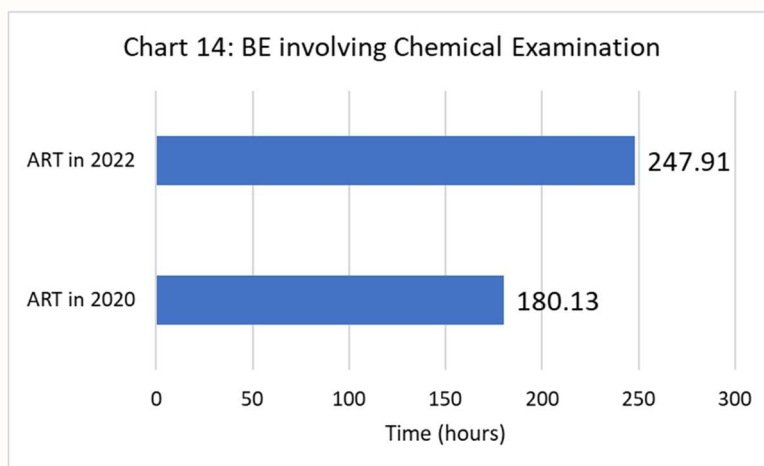
- Query replies to OOC officer may be queued to the next officer in attendance, rather than que them to await closure by the same officer.
- Systems checks may be expanded to cover all BE involving polar questions (yes-no question) that arise frequently. ICES may automate reminders to importers for pending compliance.
- System checks are already in place for polar questions like NOC from AQCS/PQIS/FSSAI/CDDRUG/WCCB, OTP verification (deferred duty cases), COO defacement. BE involving such checks need not be routed by ICES to OOC Officer until their compliance thereby obviating the need of queries in such instances.

BE involving Customs chemical examination

15.3.5 Nhava Sheva Customs implemented recommendation of TRS-2020 by providing QR code-based sampling solution to capture the time stamps of samples drawn for testing. The data collected during the study showed as follows –

Table 15: BE involving laboratory test				
Nature of BE	%age share in total (number)		ART in hours	
	2020	2022	2020	2022
Customs chem. exam. BE	8.77 (120)	7.83 (117)	180.13	247.91

During the study period, 117 BE were observed where sample was drawn for testing at DYCC, JNCH.



The samples reached DYCC on an average of 53.07 hours from their drawal at Docks. DYCC issued test report for the samples on an average of 36.83 hours.

Recommendation 11

With regard to goods requiring Customs chemical tests, ensuring the transportation of sample from Docks to Lab on the same day and issuance of test report by DYCC preferably on the same or by next day would reduce the release time for such goods.

16. Time taken for duty payment

16.1 Payment of duty is the norm for taking delivery of the imported goods. Two reforms on duty payments have been made by CBIC.

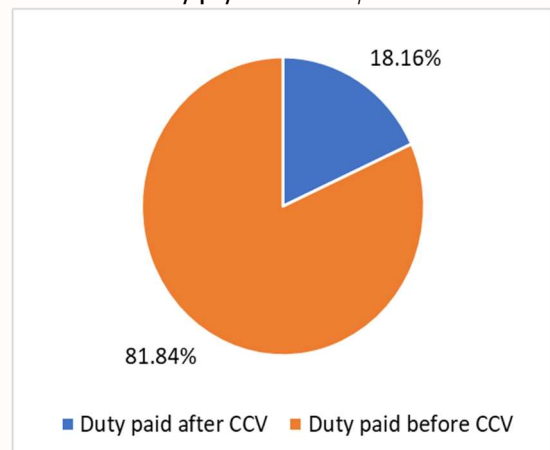
- (i) Deferred Duty Payment: The facility enables importers to take the delivery of imported goods first and pay duties later.
- (ii) Removal of condition of duty payment: Under modified procedure, for all BE, duty payment is not mandatory for Goods Registration. CCV can be completed even while duty has not been paid. On completion of CCV & subsequent payment of duties, Customs system automatically generates online OOC.

16.2 The impact of time of duty payment on average release time was analysed.

16.3 In 2759 (18.16 per cent) BE duty was paid on an average 45.55 hours after CCV. The ART of this category of BE is 117.11 hours which is prolonged on account of delay in duty payment.

16.4 As all Customs Compliance Verification is completed when CCV is granted, and clearance is pending only for want of duty payment, if the definition of average release time is taken to be the average of time taken from entry inwards to CCV, it stands calculated at 78.83 hours as against the ART for JNCH, Nhava Sheva of 88.39 hours.

Chart 15: Duty payment before/after CCV



EXPORTS

17. Export procedure in relation to release time

Methodology

17.1 Export clearance by Customs is handled at CFS for containerisation of the cargo or at parking plazas (PP) for sealed FCL containers arrived from exporters premises. The customs processes are a segment of the overall export procedure.

An exporter with the facility of self-sealing, obtains e-Seal from CBIC's authorised eSeal Vendors and transports his goods through e-sealed Containers to Parking Plazas at JNPT for export. E-Seal vendors record the time stamp of generation of eSeal for a container.

An exporter with no facility of self-sealing, transports his goods to Container Freight Stations (CFSs) where the goods for exports are aggregated in containers and sealed by the Custodian under supervision of Customs.

As a norm, the exporter files electronic customs declarations, **shipping bill (SB)**²⁹, before arrival of goods in CFS or PP.

The broad stages in the export process whose time is measured are described below.

- (a) The exporter/CB handles the activity from factory/exporter's premises to customs area CFS/PP (**pre-arrival or domestic stage**)

It is to be noted that the SB with exporter's self-assessment is filed electronically before movement of goods begins, and most of the times, the export declaration processing by customs is simultaneous with movement of goods from factory/warehouse to port area i.e. it is accomplished before arrival of goods at the Customs area (CFS or PP). The RMS allows the lowest risk category to be cleared as facilitated

²⁹ SB – is an export declaration presented to Customs by the exporter under section 50 of the Customs Act before goods can be exported out of the country.

without subjecting the cargo to either assessment or examination.

- (b) Exporter/CB also handles entry of goods inside the CFS/PP to goods registration (**stage 1**) and the goods Registration to Let Export Order (**LEO**)³⁰ (**stage 2**) activity.

The exporter/CB produces Shipping Bill, Annexure-C with other prescribed documents to the Custom Officer for undertaking registration.

Once goods are presented, if at the PP, Customs verify e-seal on the container arrived from exporter's premises. E-seal verification is done on-wheel and using hand-held reader.

On making registration, the documents are verified in all cases. Customs Officer checks examination instructions prescribed by RMS or Assessing Officer for each Shipping Bill. In case, no examination is prescribed for a Shipping Bill, it is taken up for issuing Let Export Order (LEO). Examination, if prescribed for SB including DPE³¹ consignment, is undertaken at CFS.

LEO officer after verifying other compliances and examination report, issues Let Export Order (LEO). Additionally, for DPE shipping bills dealt in parking plaza Form-13 from shipping line is pre-requisite for LEO.

- (c) In CFS, after LEO the goods are handed over to freight forwarder/consolidator for preparing them for export. In PP, the container survey is done by representative of shipping line. After this the container is moved. This leads to the stage of LEO

³⁰ Let Export Order (LEO) - is the final procedure of export customs clearance procedure to export any goods outside country. It permits the loading of the goods for exportation.

³¹ DPE shipping bill at parking plaza, when selected for examination were routed through CFS during the study period. The procedure has been changed vide JNCH Public Notice No. 19/2022 dated 24.03.2022.

to CFS/PP gate-out (**stage 3**), which is followed by the stage of CFS/PP gate-out to port-terminal gate-in (**stage 4**).

- (d) The further stages are port-terminal gate-in to loading of cargo on vessel (**stage 5**), then loading on vessel to vessel departure/sailing (**stage 6**).

Data sources

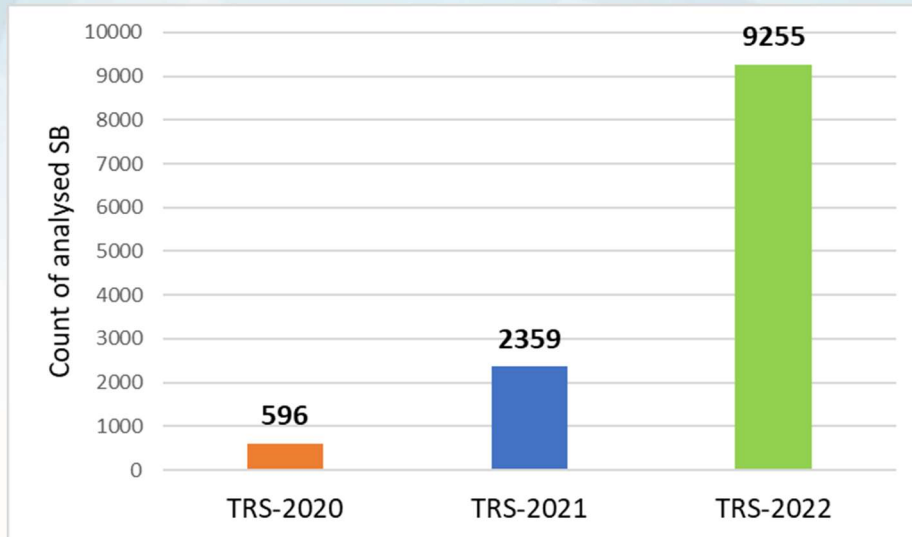
- 17.2 The measures of time at various stages of export goods movement are based on data from Custodians. The ICES tracks movement of the SB and records the time stamps from SB submission to LEO.

Recommendation 12:

Implementation of SCMTR for entire export cycle would ensure real time integration with ICES of all Custodian timestamps pertaining to goods arrival and departure. Exclusions in exports sample can then be made minimal as is the case in import.

18. Average release time and distance covered to target

Chart 16: TRS Export sample size



Average release time³² in exports

18.1 In 2022, the overall average release time exports from arrival of goods to final departure was 186.58 hours for 9255 SB.

Table 16: Export average release time (hours)							
	At CFS			At PP			
	2020	2021	2022	2020	2021	2022	
						Inv. buffer storage ³³	Not inv. Buffer storage
ART	183	231.83	263.65	95.95	106.16	314.92	116.81

Analysis shows that average release time of exports from PP is affected by substantially higher release time of 780 SB involving buffer storage.

³² The arithmetic mean of time taken in stages 1 to 6 yield average release time. It is referred as net release time in TRS 2020.

³³ As per Public Notice No. 13/2019 dated 06.02.2019, in exceptional cases/circumstances such as vessel missed, self-sealed containers can be taken out of parking plaza for storage in buffer yard.

Distance covered to NTFAP Target

18.2 The average release time is within revised NTFAP target of 24 hours of only the fastest 01.27 per cent. of SB.

Table 17: Distance covered to NTFAP target						
		Good arrival to LEO		Goods arrival to Vessel departure		
		Average Time (hours)	Distance covered to target	ART (hours)	Distance covered to target	
CFS	2021	33.6	90%	231.5	0.2%	
	2022	46.98	77.24%	263.65	0.01%	
PP	2021	13.1	100%	106.1	0.4%	
	2022	Not invl. Buffer storage	7.30	100%	116.81	2.30%
		Invl. Buffer storage	142.43	12.82%	314.92	0.01%

The net release time of exports from PP is within revised NTFAP target of 24 hours in only 2 per cent of SB. This figure was calculated as 0.4 per cent in 2021. Net release time of exports from PP is affected by substantially higher release time of 780 SB involving buffer storage.

Average time taken from goods arrival to LEO:

18.3 In many cases, the schedule for transportation of export goods to the port are based on a ship's schedule, the cut-off date/time for delivery of goods to the container yard, or even the timing of an order from foreign customers. The average time taken from goods arrival to LEO may be considered in order to judge efficacy of Customs clearance process.

The average time taken from goods arrival to LEO is within revised NTFAP target of 24 hours of the fastest 96.51 per cent. of analysed sample of SB.

The average time taken from goods arrival to LEO from PP is within revised NTFAP target of 24 hours in 99.80 per cent of analysed SB. This figure was calculated as 100 per cent in 2021. As average time taken from goods arrival to LEO of exports from PP is affected by substantially higher release time of 780 SB involving buffer storage, if SB involving buffer storage are excluded, NTFAP target of 24 hours is met in 100 per cent of such SB.

All 26072 SB filed between 1st January to 7th January, 2022 were given LEO on an average of 64.09 hours from their submission. The time measured in the study of 26072 SB in export stage 2 is mapped below –

	Count of Shipping Bills	Registration to Examination Time (hours)	Examination to LEO Time (hours)	Registration to LEO (stage 2) Time (hours)
Exports from CFS	17993	3.54	2.14	5.68
Exports from PP/DPE	8079	0.40	28.54	28.93
ALL	26072	2.56	10.32	12.88

Recommendation 13:

- (a) Average time from Registration to LEO in PP can be studied after isolating SB that availed buffer storage facility due to exigency.
- (b) DPE shipping bill at parking plaza, when selected for examination were routed through CFS during the study period. The procedure has been changed vide JNCH Public Notice No. 19/2022 dated 24.03.2022 which provides for examination of DPE SB selected for examination in the PP itself. This measure will bring down the release time and cost for the exporters, impact of which can be studied in the next TRS.

19. Time taken at individual stages

19.1 9255 SB are analysed in TRS-2022. Their time measured export stage-wise is mapped below –

Table 19: Time taken at individual stages

		Count of Shipping Bills	Custodian gate-in to Registration	Registration to LEO	LEO to Custodian gate-out	Custodian gate-out to Port gate-in	Port gate-in to loading on vessel	Loading on vessel to departure	ART
			Stage 1	Stage 2	Stage 3	Stage 4	Stage 5	Stage 6	
All SB		9255	16.74	16.29	42.54	6.31	95.49	9.21	186.58
Parking Plaza	Involving storage in buffer yard	780	2.16	140.27	39.29	6.49	116.43	10.27	314.92
	Not involving storage in buffer yard	5130	2.44	4.86	1.72	4.75	93.91	9.12	116.81
	All	5910	2.41	22.73	6.68	4.98	96.88	9.27	142.96
CFS		3345	42.06	4.93	105.91	8.65	93.03	9.83	263.65

Time in hours

19.2 A prime difference is visible in the time measured in the CFS vis a vis time in PP/DPE not involving storage in buffer yard, constituted collectively by stages 1, 2, 3 and specifically the stage 3 in table – E1.

There are some common reasons that add to time at this stage, such as time being dependent upon exporters/CBs producing documentation or in case of shipment under multiple transport vehicles the time is recorded from first part arrived while registration awaits arrival of all parts of the shipment.

Recommendation 14:

- (a) CFS & PP timestamps may be integrated in ICES, and online registration of goods may then be introduced in export.
- (b) At PP, for direct port entry, after scanning e-seal for verification by hand-held reader, the sealing details could be electronically integrated with ICES.

Once the container is e-sealed and prior to gate-in at PP, the electronic declaration of Annexure- C details by exporter/CB could be activated.

The electronic matching of above details in the SB when process of registration is undertaken can do away with need for exporter/CB to come to the PP, apart from eliminating EGM errors.

- 19.3 Further, in a CFS, in stage 3, the time involved as compared to PP is higher for, amongst others, the reasons that post LEO, before relevant cargo is moved out from CFS, it is to be aggregated or consolidated and then stuffed into a container, which takes time. For these activities, a CB hands over documents to consolidator who plans the activities keeping in view the vessel cut-off time/date.

A survey of shipment is made for its packing type (carton, bale, pallet, drum, loose etc), volume and weight. This is repeated for cargoes from multiple exporters. Such aggregation enables making of container load plan for each container load port wise / transshipment port wise. Then stuffing is carried out by the CFS in a common container under supervision of customs officer and sealed as being ready for export. Based on LCL consolidator requisitioning movement, the CFS moves the container to port-terminal.

The data distribution shows that in stage 3 of LEO to CFS gate-out wherein the average time is 105.91 hours, in up to 72 hours only 56.20 per cent SB cleared stage 3. Moreover, 22.51 per cent SB took over 7 days to clear this stage.

Recommendation 15:

Automation in CFS procedures like survey, consolidation etc may be encouraged; filing of stuffing report by CFS within, say, 8-12 hours of LEO may be used a parameter to measure efficacy of CFS. This measure will enable a smooth transition to SCMTR regime where Sea Departure Manifest (SDM) is to be filed before departure of vessel, apart from ensuring faster release time from CFS after LEO.

- 19.4 **Stage 4** is the transportation stage of fully prepared and ready to export containers from custodian premises to port-terminal. The higher time

taken at this stage in transportation from CFS via a vis from PP, may inter alia, be attributable to distance of the CFS/PP from the terminal gate, the road conditions, time of the day etc.

- 19.5 The export **stage 6** of loading of cargo on vessel to departure of vessel is also a goods movement stage. It averaged 9.22 hours in the study. Loading generally starts within 2 hours of berthing of vessel and continues to maximum approx. 20 hours. In a few instances, even the loading is allowed till last hour. The average measured appears consistent with these general aspects.
- 19.6 An average time of 94.48 hours at the intervening **Stage 5** implies that the cargo, which has already complied with requirement prescribed for export, waited³⁴ at the terminals for average 4 days, prior to loading.
- 19.7 The analysis shows that in 0 -96 hours, overall 63.84 per cent. of the SB that entered stage 5, had cleared stage 5.
- 19.8 Higher ART in exports is attributed to the fact that export containers wait inside the terminal well in advance of the cut-off times, even though it is admissible for them to arrive inside the terminals just before the cut-off times.

**

³⁴ The port-terminals allow such export cargo entry into terminal premises up to 4 days prior to "cut-off". The cut-off is usually 6 - 8 hours prior to arrival of vessel. The cut-off time may stand reduced for perishable cargo, but in general in the few instances where cut-off time is reduced it is in lieu of charges. While feedback is that exporters like to have the certainty of export occurring in time and such advance arrival of cargo is facility extended to exporters, the time available also acts as an enabler for terminals to prepare for optimising vessel turnaround times.

Recommendations

Imports

1. Faster average release time can be achieved by continuing outreach to stakeholders –
 - (a) by increasing share of Pre-arrival BE beyond current 87.64 per cent., and
 - (b) raising coverage of AEO programme and DPD scheme from present level.

(page 14)

2. Improving adoption of online amendment by continuing outreach to stakeholders, especially Customs brokers. Auto-regularisation of Pre-arrival BE by Customs Officer to be discouraged and done only in exceptional cases and not as a matter of routine.

(page 16)

3. CBIC may consider increase in late filing charges or levying graded late filing charges to nudge Importers to file pre-arrival BE.

(page 17)

4. On BE involving examination

- (a) CFSs to be encouraged to migrate their following processes online for speedy operation, greater convenience to trade, and so that time stamps are available for comparative study.

- Request for container grounding & destuffing
- Request for seal cutting
- eInvoicing, ePayment
- eDelivery Order based on Customs OOC communicated online.

- (b) Multi-stakeholder application already introduced on pilot basis where Customs, Custodians, Customs Brokers/importer are on the same platform having a shared view of scheduling examination of goods may be rolled out for all customs formations. This initiative will ensure fullest transparency alongside of convenience for trade and other stakeholders.

(page 21)

5. On BE submission to assessment

- (a) National Assessment Centres may issue National Assessment Guidelines with a view to rationalise examination orders, monitor instances of PUSH & PULL of BEs and Queries
- (b) CBIC may consider the functioning of FAGs on 24x7 basis by keeping some of the Assessment Centres in the country active during night & on holidays, after adequate provisioning of manpower.
- (c) CBIC and DG systems may consider treating BE waiting in the que of FAG, but pending completion of appraisal resulting in either a due examination order or query, as 'BE not attended to during working hour' and auto-queue those BE in another Faceless Assessment Group that may be active in subsequent hours.
- (d) Data quality in declarations and self-compliance will mitigate the queries in assessment. The outreach programmes to trade are key to achieve the requisite quality.
- (e) Amendment module in ICES may be comprehensively overhauled to que amendment requests, allow raising queries on amendment request, receive supporting documents and replies on eSanchit, enable viewing document status and declared particulars from same window as amendment module.
- (f) Implementation of CBIC circular 14/2021 dated 07.07.2021 regarding routing of first check BE directly to shed/dock officers would contribute substantially to reducing release time of first check BE.

(page 24)

6. CBIC may consider auto-registration of facilitated BE for Customs Compliance Verification (CCV) to better their ART.

(page 26)

7. On BE involving PGA

- (a) PGA may consider moving to pre-import checks, operationalized in a manner similar to BIS compliance requirements on import, as against the present norm of post-import checks

- (b) Plant Quarantine, FSSAI and Textile Committee may review and re-orient their internal functioning framework in terms of staffing, infrastructure and office location etc to specifically cater to the requirements for larger ports like Nhava Sheva
- (c) Every PGA to ensure NOC only by electronic message exchange to save time, including time taken for linking report with BE.

(page 30)

8. On BE involving COO and other verification by TSK

- (a) Implementation of CBIC circular 14/2021 dated 07.07.2021 regarding anonymized escalation of trade grievances on pending BE would contribute in reduction of release time.
- (b) Electronic filing and debit of Licenses, Permits, Certificate, Other approvals (LPCO) from other agencies, may be made mandatory for submission of BE. Self-assessment by importer cannot be said to be complete until all mandated debit, verification and upload of LPCO is completed. Therefore, it is only reasonable to mandate that all debit is carried out before BE submission.
- (c) It is recommended that government may consider replacing the present framework/arrangement of honouring preferential imports at ports (involving production of physical paper COO certificates and their verification/debiting at time of import) with electronic exchange of documentation to achieve a paperless clearance.
- (d) It is recommended that government may consider introducing electronic means of submitting bond and bank guarantee.
- (e) It is recommended that different regulatory agencies be given access on ICEGATE for the purpose of generating/issuing certificate in an agency-wise specified format. Upon generation of such certificate with an IEC No. etc, a unique ID may get associated, which would get quoted in the BE for which a specific field needs to be provided, thereby enabling ICES to electronically verify.
- (f) A similar process may also be considered for the purpose of specific import license/original NOC from BIS, Rubber Board, RNI, CBN etc.

(page 31)

9. It is recommended that to better release time, the scanning output be integrated with ICES, so that the officer at the RMS facilitation centre/docks/terminal gates can act without requirement of the copy of physical scan EIR.

(page 32)

10.On BE involving queries by OOC officer

- (a) Query replies to OOC officer may be queued to the next officer in attendance, rather than que them to await closure by the same officer.
- (b) Systems checks may be expanded to cover all BE involving polar questions (yes-no question) that arise frequently. ICES may automate reminders to importers for pending compliances.
- (c) System checks are already in place for polar questions like NOC from AQCS/PQIS/FSSAI/CDDRUG/WCCB, OTP verification (deferred duty cases), COO defacement. BE involving such checks need not be routed by ICES to OOC Officer until compliance thereby obviating the need of queries in such instances.

(page 33)

11. With regard to goods requiring Customs chemical tests, ensuring the transportation of sample from Docks to Lab on the same day and issuance of test report by DYCC preferably on the same or by next day would reduce the release time for such goods.

(page 34)

Exports

12. Implementation of SCMTR for entire export cycle would ensure real time integration with ICES of all Custodian timestamps pertaining to goods arrival and departure. Exclusions in exports sample can then be made minimal as is the case in import.

(page 38)

13.On DPE/PP SB

- (a) Average time from Registration to LEO in PP can be studied after isolating SB that availed buffer storage facility due to exigency.
- (b) DPE shipping bill at parking plaza, when selected for examination were routed through CFS during the study period. The procedure has been changed vide JNCH Public Notice No. 19/2022 dated 24.03.2022 which provides for examination of DPE SB selected for examination in the PP itself. This measure will bring down the release time and cost for the exporters, impact of which can be studied in the next TRS.

*(page 41)***14.**On SB registration

- (a) CFS & PP timestamps may be integrated in ICES; online registration of goods may then be introduced in export.
- (b) At PP, for direct port entry, after scanning e-seal for verification by hand-held reader, the sealing details could be electronically integrated with ICES. Once the container is e-sealed and prior to gate-in at PP, the electronic declaration of Annexure- C details by exporter/CB could be activated.

The electronic matching of above details in the SB when process of registration is undertaken can do away with need for exporter/CB to come to the PP, apart from eliminating EGM errors.

(page 42)

- 15.**Automation in CFS procedures like survey, consolidation etc may be encouraged; filing of stuffing report by CFS within, say, 8-12 hours of LEO may be used a parameter to measure efficacy of CFS. This measure will enable a smooth transition to SCMTR regime where Sea Departure Manifest (SDM) is to be filed before departure of vessel, apart from ensuring faster release time from CFS after LEO.

(page 43)

Steps having bearing on release time taken after TRS 2021

S. No. Steps

- 1 Advance filing of Bill of Entry through legislative changes in Section 46 of Customs Act, 1962.
- 2 Working of RMS-Facilitation Centre on 24x7 basis.
- 3 Operationalization of Centralized Parking Plaza.
- 4 Procedure for re-sealing of containers with broken/absence / mismatch of seal including tampered seal to be followed at Port Terminals- Public Notice No 99/2021.
- 5 Improvements in Faceless Assessment - Measures for expediting Customs clearances by way of i) Reorganization of FAG for specialization and optimization of workload, ii) Extension of DPD facility to Advance Bills of Entry which are fully facilitated., iii) Enhancement of Facilitation Level, iv) Expediting Assessment Process. (Circular No 14/2021)
- 6 Online Amendment of BL, and Prior to Final (Submission of documents for specified items of work through e-mail- a measure to minimize human contact) Public Notice No 38/2021.
- 7 Mandatory document code in e-sanchit against unique IRN. Circular No. 55/2020 (Faceless Assessment- Clarifications on the Issues raised by Stakeholders)
- 8 Alignment of AEO circular with CAROTAR, Circular No. 02/2022.
- 9 Amendment in Circular no 38/2016-Customs to enable Pr. Commissioner /Commissioner of Customs to decide the amount of security required in certain cases of provisional assessment, Circular No 19/2021.
- 10 Amendment in AEO programme: Auto renewal of AEO -T1 validity for continuous certification based on continuous compliance monitoring, Circular No.18/2021.
- 11 Online filing of AEO T2 and T3 applications: Launch of version 2.0 of web-application for filing, real time monitoring, and digital certification, Circular No. 13/2021.
- 12 CRCL Module - Forwarding of samples using electronic Test Memo to CRCL and other Revenue Laboratories, Instruction No. 14/2021.
- 13 QR based Sampling Solution.
- 14 Electronic mechanism to amend BL number in Prior/Advance BE with Auto Approval, Public Notice No 50/2021.
- 15 Commissioning and commencement of operation of Mobile X-Ray Container Scanner (MXCS) at JNPCT Terminal.
- 16 Revamped "Tax Payer Service Centre" at JNCH, Public Notice No. 18/2022.
- 17 Setting up of Centralized Registry Unit to implement paperless, contactless and electronic communication with all stakeholders.
- 18 Faceless Assessment – Creation of Facilitation Helpdesk at Turant Suvudha Kendra, Public Notice No. 81/2021.

F. No. GEN/EDI/Misc./335/2021-EDI-O/o Commr-CUS-Nhava Sheva -I

**OFFICE OF THE COMMISSIONER OF CUSTOMS (NS-I)
JAWAHARLAL NEHRU CUSTOMS HOUSE , NHAVA-SHEVA
URAN, RAIGAD, MAHARASHTRA -400707**

FAX -022-27243245 EMAIL ID- edi@jawaharcustoms.gov.in

F. No. EDI/MISC-66/2021/JNCH

Date: 30.12.2021

OFFICE ORDER NO. 05/2021

CBIC has decided to conduct National Time Release Study-2022(NTRS-2022) for the period from 1.1.2022 to 7.1.2022. In this study, cargo in relation to Bills of Entry and Shipping Bills filed between 1-7 January 2022 would be tracked till their final release. JNCH is a part of the National TRS. JNCH shall also draw its internal conclusions.

In view of the above, a team of officers for TRS-2022 has been constituted. The names of officers and their roles are as below:

Sr. No.	Role	Name of Officer (Shri/Smt/Ms.) & Designation	Roles
1	Convenor & Overall incharge	Narendra V. Kulkarni Commissioner, NS-II&III	To supervise and guide all teams
2	Co-Convenor	U. Niranjan, Pr. Commissioner, NS-I	
Istikhar Baig, Commissioner, NS-Gen & Audit			
D S Garbyal, Commissioner, NS-V			
3	Nodal Officer	Raguram K., Joint Commissioner	Will coordinate and communicate with NCTF, CBIC, Delhi
4	Co-ordination with Customs Brokers, Importers & Exporters	V. Ramanadha Reddy, Joint Commissioner,	Will communicate with exporter and customs brokers for early action at their end.
Sushil Chandra, Addl. Commissioner			
5	Co-ordination with FAG locations	Raguram K, Joint Commissioner	Will communicate with FAG locations related to pendency
V. S. Teotia, Asst. Commissioner			
6	Co-ordination with Ports, Terminal, CFSs related to imports and exports	Merugu Suresh, Joint Commissioner Mohit Jangid, Dy. Commissioner Nikhil Goyal, Dy. Commissioner	Will communicate with Ports, Terminal and CFSs for prompt movement of imports and exports cargo

Sr. No.	Role	Name of Officer (Shri/Smt/Ms.) & Designation	Roles
7	Co-ordination with all assessment Groups and data collection from them	Sushil Chandra, Addl. Commissioner	Will communicate and supervise the expeditious disposal of Bills of Entry in Group-1, IA,IB, 2H-K
		Raguram K., Joint Commissioner	Will communicate and supervise the expeditious disposal of Bills of Entry in Groups 2, 2A-F, 2G
		Sudhir S. Kohakade, Joint Commissioner	Will communicate and supervise the expeditious disposal of Bills of Entry in Group-3, 3A
		Dinbandhu Diwakar, Joint Commissioner	Will communicate and supervise the expeditious disposal of Bills of Entry in Group-4, 4A
		S.K.H. Meshram, Addl. Commissioner	Will communicate and supervise the expeditious disposal of Bills of Entry in Group-5, 5E,5N,6
		Hemlata Rai, Addl. Commissioner	Will communicate and supervise the expeditious disposal of Bills of Entry in Group-5A, 5C, 5M, 5B, 5I, 5F, 5S
8	Co-ordination with all Import Docks, TSK & RMSFC and data collection from import docks	S.K.H. Meshram, Addl. Commissioner	Will communicate and supervise the expeditious disposal of Bills of Entry in Cluster-G&H of Imports Docks, NS-V
		Hemlata Rai, Addl. Commissioner	Will communicate and supervise the expeditious disposal of Bills of Entry in Cluster-F1&F2 of Imports Docks, NS-V
		Dinbandhu Diwakar, Joint Commissioner	Will communicate and supervise the expeditious disposal of Bills of Entry in Cluster-D&E of Imports Docks, NS-III
		Sudhir S. Kohakade, Joint Commissioner	Will communicate and supervise the expeditious disposal of Bills of Entry in TSK, RMSFC & Cluster-C of Imports Docks, NS-III
		Sushil Chandra, Addl. Commissioner	Will communicate and supervise the expeditious disposal of Bills of Entry in Cluster-B of Imports Docks, NS-I
		Raguram K., Joint Commissioner	Will communicate and supervise the expeditious disposal of Bills of Entry in Cluster-A of Imports Docks, NS-I
9	Co-ordination with PGAs/labs, Central Sample Cell and data collection from PGAs/labs	Sushil Chandra, Addl. Commissioner	Will communicate and coordinate with all PGAs except Textile Committee & DYCC
		Dinbandhu Diwakar, Joint Commissioner	Will communicate and coordinate with Textile Committee
		Hemlata Rai, Addl. Commissioner	Will communicate and coordinate with DYCC & Central Sample Cell

Sr. No.	Role	Name of Officer (Shri/Smt/Ms.) & Designation	Roles
10	Data Analysis for Import & Export	Raguram K., Joint Commissioner Kapil Prajapati, Dy. Commissioner Kanchi Gupta, Dy. Commissioner Jag Mohan Sagar, Appraiser Sanjay Prasad, AO C. Ramnathan, AO	Will analyse import related data and make conclusions
		R. S. Bhati, Joint Commissioner Yogesh Chitte, Dy. Commissioner Atul Mishra, Superintendent.	Will analyse export related data and make conclusions
11	Data Acquisition, collection and retrieval	Subhash Chandra, Dy. Commissioner	Will obtain and supply all EDI data
		Mohit Jangid, Dy. Commissioner	Will obtain and supply all data related to CFSs
		Dr. Naveen Kumar DE, Dy. Commissioner Sudhir Chandra Nanda, Dy. Commissioner	Will obtain and supply all data related to Ports, Terminals, Parking Plaza
		Sanjay Vaidya, Technical Director, NIC	Will coordinate and assist in system related issue and prepare SQLS
12	Co-ordination with exports data from all Docks (Export), Parking Plaza, Terminals & CFS and data collection from them.	R. S. Bhati, Joint Commissioner	Will communicate and supervise the expeditious disposal of Shipping Bills in all Export Docks
		V. Ramanadha Reddy, Joint Commissioner,	Will communicate and supervise the expeditious disposal of Shipping Bills in Parking Plazas
		Merugu Suresh, Joint Commissioner	Will communicate and supervise the expeditious disposal of entry inwards, loading/unloading of vessels and Port/Terminals, CHS, CFSs.
13	Scanning of Container and communication of scanning output to officers	Dinbandhu Diwakar, Joint Commissioner Manish Yadav, Dy. Commissioner Rajesh D'souza, Superintendent.	Will monitor all works related scanning and ensure timely generation of scan reports
14	Co-ordination for network and pendency	Subhash Chandra, Dy. Commissioner Hemraj Yadav, AO Sujeet Kumar, AO(in-situ) Abhilash Verma, AO Kuldeep Yadav, EO	1. Uninterrupted Network 2. Daily Monitoring of pendency of imports and exports
15	Co-ordination for infrastructure and event management	Dr. Naveen Kumar DE, Dy. Commissioner Pravin Sinha, Superintendent	1. Uninterrupted Electricity 2. Available of other in-house service on Saturday and Sunday

Sr. No.	Role	Name of Officer (Shri/Smt/Ms.) & Designation	Roles
16	Compiling/Drafting/ Publishing of TRS	Raguram K. Joint Commissioner Subhash Chandra, Dy. Commissioner Nikhil Goyal, Dy. Commissioner Kanchi Gupta, Dy. Commissioner Shreyansh Mohan, Dy. Commissioner Jag Mohan Sagar, Appraiser* Mahesh Purohit, AO Venugopal S Aiyer, Superintendent.	Will compile, draft and publish the conclusion related to JNCH as relevant.
17.	Advertisement/ Printing/Publishing of TRS	Dr. Naveen Kumar DE, Dy. Commissioner Pravin Sinha, Superintendent.	Will provide service related to advertisement/printing/publishing of TRS

*Vide Office Order No. 03/2022 dated 07.01.2022

This issues with the approval of the Chief Commissioner of Customs, Mumbai Zone -II.

(RAGURAM K.)

Joint Commissioner of Customs
NS-I/EDI Section/JNCH

Copy to:

1. PS to the Chief Commissioner of Customs, Mumbai Zone-II
2. All the Pr. Commissioner/Commissioner of Customs, Mumbai Zone-II
3. All the Addl./Joint Commissioner/Commissioner of Customs, Mumbai Zone-II
4. All the Dy./Asst. Commissioner/Commissioner of Customs, Mumbai Zone-II
5. The DC/EDI for uploading on the JNCH website.
6. All concerned officer
7. Office copy



**Government of India
Ministry of Finance, Department of Revenue
Central Board of Indirect Taxes and Customs
Jawaharlal Nehru Custom House
Mumbai Customs Zone-II
Nhava Sheva**