



सीमाशुल्क आयुक्त कार्यालय (एन. एस. -II)

**OFFICE OF THE COMMISSIONER OF CUSTOMS (NS-II),**  
मूल्यनिरूपण मुख्य (निर्यात) **APPRAISING MAIN (EXPORT)**

जवाहरलाल नेहरू सीमाशुल्क भवन/**JAWAHARLAL NEHRU**  
**CUSTOM HOUSE, शेवा/SHEVA,**

तालुका/**TAL-उरण/URAN**, जिला/**DISTRICT- रायगड/RAIGAD,**  
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फा. सं/**F.No. S/12-Gen-03/2022-23 AM(X) Pt. XVI**

दिनांक /**Date:- .07.2023**

दिनांक **30/06/2023** को सम्पन्न 'स्थायी व्यापार सुविधा समिति' (निर्यात) की बैठक का कार्यवृत्त

**MINUTES OF THE MEETING OF THE PERMANENT TRADE FACILITATION COMMITTEE**

**(EXPORT) June HELD ON 30/06/2023**

The PTFC meeting held through physical mode on 30/06/2023 was chaired by Shri. D. S. Garbyal, Commissioner of Customs (Gen/NS-III) and attended by Shri Sonal Bajaj, Commissioner of Customs (NS-V).

The meeting was attended by the following members/participants of the trade:

क्रमसं./ Sr. No.	नाम(सर्वश्री/सुश्री/श्रीमती) Names(S. Shri /Ms./Mrs.)	(संगठन/संघ /पदनाम) Organisation/Association	Mode of attendance in PTFC
1	Capt. Ravi Kumar	CSLA/HMM	Physical
2	Victor Fernades	MANSA	Physical
3	S. Sriniva	CFSAI	Physical
4	Ganpat P.Korade	BCBA	Physical
5	Maruti R. Gadge	BCBA	Physical
6	Harsh Lapsia	BCBA	Physical
7	Anand Bhole	HMM	Physical
8	Rakesh Mistry	Godrej & Boyce Mfg. Co. Ltd.	Physical
9	Sunil Vaswani	CSLA	Physical
10	C. Y. Chot	HMM	Physical
11	Manish Kumar	MSC/CSLA/MANSA	Physical
12	Jacob Thoma	CFSAI	Physical
13	Sanjay C. Shingote	BCBA	Physical
14	Venkatram Narayanan	CFSAI	Physical
15	Salim Shicalgar	CFSAI	Physical
16	Vinayak A	BCBA	Physical
17	Parag Shhah	BCBA	Physical
18	Kamal S. Shah	BCBA	Physical

2. विभाग की ओर से निम्नलिखित अधिकारियों ने बैठक में भाग लिया: -  
Following Officers from the department attended the meeting: -

क्रमसं./ Sr.No.	नाम(सर्वश्री/सुश्री/श्रीमती) Names(Shri/Ms./Mrs.)	पदनाम Designation
1.	Shri Merugu Suresh	Addl. Commissioner, Customs
2.	Shri Balmukund	Addl. Commissioner, Customs
3.	Shri. Subhash Yadav	Addl. Commissioner, Customs
4.	Smt. Usha N. Bhoyar	Addl. Commissioner, Customs

### **GENERAL COMMISSIONERATE**

3. Shri Merugu Suresh, Additional Commissioner of Customs, JNCH started the discussion on the agenda points of the meeting related to the General Commissionerate

#### **I. AGENDA POINTS RAISED BY BCBA**

##### **1. NVOCC Charging Movement Charges for DPD-CFS Shipments**

There are cases wherein NVOCCs M/s. MU Logistics India Pvt. Ltd are levying Movement Charges in cases of DPD-CFS Shipments. This is in violation of PN 01/2017 and the same has been represented with Customs as well. We request for clear guidelines and stringent mechanism in place.

**प्रतिक्रिया/Response: The Chair stated that if any violation is noticed, may be taken up to Commissioner(G).**

##### **2. Availability of Examination order after registration of Shipping Bill**

We wish to bring to your kind notice that since last few months, due to technical errors in the ICEGATE/EDI system, trade is not receiving online Examination Orders. This is creating huge difficulty for preparing documents for examination and also for carry out examination. Custom Brokers have to stand in queue at the examiners screen to check the examination order.

To achieve the Endeavour of Govt. of India for Ease of Doing Business and uphold the principles of Transparency & Predictability, we suggest that the Examination orders should be made available after registration of Shipping Bills.

**प्रतिक्रिया/Response: The Chair stated that the matter will be taken up by export commissionerate.**

## **II. AGENDA POINTS RAISED BY IMC**

### **1. POINT NO. 1.**

The shipping lines continue to demand deposit of Blank Cheques from Importers Customs Brokers for clearance of FCL Containers. Despite the above points being addressed repeatedly, it is regretted that many Shipping Lines and their Agents continue to demand blank cheques for either Rs.50,000/- depending on the whims and fancies be deposited pending clearances. If the Blank Cheques are not deposited, they illegally withhold issuance of Delivery Order, thereby frustrating expeditious clearance. FCL Containers are moved by the Shipping Lines, by their nominated CFS Operators, to their nominated CFSs. The containers are also de-stuffed by their nominated CFS Operators.

Despite the above, they deem the Importer/Consignee be liable for any damage even though the Container at no stage, is handled by the importer or his authorized Custom Broker. We can give specific cases if you desire.

It is requested that this practice must be stopped and request the department to assist the EXIM Industry.

**प्रतिक्रिया/Response: The chair stated that there is already a PN has been issued. All the stake holder has to follow it. If any violation is noticed, matter may be taken up to Commissioner (G).**

### **2. POINT NO. 2**

It is brought to our notice that at certain CFS's the Preventive Officer of the gate, leaves the premises by 10.20 pm, thereby delaying clearances and forcing the Trade in the middle of night to go their home to get Lorries passed out.

We have specific cases. However, request that Standing Order be issued that the Preventive Officer should not leave the CFSs till all deliveries are completed.

**प्रतिक्रिया/Response: The chair stated that Now the new officers have joined, if required, the POs posted on other suction will be directed to the Gates.**

### **III. AGENDA POINTS RAISED BY CSLA**

#### **1. Offline light dues payment to be allowed in case of technical issues of DGLL system –**

We appreciate JNCH for allowing shipping lines/agent to pay offline payment of light dues recently when DGLL online portal was not working for four days because of some technical glitches. As technical glitches keep on developing in every few months, We request JNCH to allow manual payment basis on email message from DGLL team instead of submission of separate request letter by each shipping line.

**प्रतिक्रिया/Response: The chair stated that whenever such request is made by DGLL, it is already being allowed through email itself and there is no need of separate permission through file.**

#### **2. Parallel filing of SCMT messages should be stopped until necessary modifications are made in export & import message filing –**

As you are aware SCMT message filing has been postponed till 31st December 2023. CSLA had raised several difficulties related with import & export message filing which have not yet been addressed by DG System & CBIC. Presently shipping lines are filing import message with few system acceptable scenario only (Import supplementary messages for amendment filing is still not working), the export messages are still not functional because of certain issues in stuffing/arrival / departure message filing of CFS / ICD. There are issues of national bond also, when import is successfully filed, the bond is debited and can get credited when export messages are successfully filed for the same container. Since export message filing is still not functional, the debited bond is not getting credited which may be exhausted once bond limit is over. Further, it is double work for staff preparing and filing IGM /EGM & testing SAM/SDM simultaneously which is waste of time & man power. In view of above issues, JNCH is requested to stop parallel filing of SCMT messages until SCMT related issues are resolved and complete message filing solution is provided.

**प्रतिक्रिया/Response: The chair stated that the matter will be reviewed in a separate meeting.**

#### **3. Transshipment Process:**

This matter on TRANSHIPMENT PROCESS was raised by CSLA at the PTFC meeting on 2nd March 2022 at which, the Commissioners Mr. Sonal Babaj & Mr. Garbyal were present. As per the minutes of the meeting, the below was the outcome:

**QUOTE :**

The Chair stated that all these sub sections are related to policy matter and CBIC/DG Systems are the proper authority regarding the same. However, a letter with the approval of Commissioner of Customs, has been sent to Dy. Secretary (Customs), CBIC, Delhi, with request to look into the matter and clarify the issue by way of issuance of Notification or Circular.

**UNQUOTE:** Feedback in the matter would be deeply appreciated.

The details are once again mentioned below for your ready reference:

In the case of exports wherever ETP (export transshipment permit) is not applicable (especially in the case of a foreign vessel which is not registered as a coastal carrier), the EDI export general manifest is filed at the first gateway port where the shipping bill is processed and the arrival manifest is required to be filed as transshipment at the next Indian transshipment port.

As indicated, Chennai custom insisting for ETP for cargo being loaded from Nhava Sheva and Mundra for transshipment at Kattupalli, in which case, the ETP process would have to be activated by Nhava Sheva customs as per PN 76/2018.

Further details on Export / Import via transshipment are as follows:

**a. Export / Import via transshipment through other Indian Port without going third country -**

This transshipment scenario has been cleared covered in CBEC circular 38/2018 which says there is no need of bond & bank guarantee for transshipment of containers if it is happening directly between two sea ports. Hence bond & bank guarantee is not required to be executed for doing this type of transshipment. The detailed process for transshipment of import & export containers between two Indian port is mentioned in the above representation. A standard guideline is required to be circulated for all the customs locations which will help stakeholders to adopt the uniform process across the locations.

**b. Export via transshipment through Srilanka/Bangladesh/Pakistan port without change of vessel -**

As authorized carrier will be doing this type of transshipment regularly, most of the carrier would like to go with Continuity Transshipment Bond (Form IX B). Further the IX A/B/C bond application states that the transshipment process should be closed within one month of the bond date. Since continuity transshipment bond will be submitted once in a year, hence one month period for closure of transshipment process should be considered from the date of filing departure manifest of the customs of 1st Indian gateway port. Also since containers in this scenario will remain onboard on the same vessel without change of vessel in transit foreign port, Hence Pakistan / Other ports too may please be added for such transshipments cases which will help Indian ports to attract all such transshipment volumes.

**c. Export via transshipment through Srilanka/Bangladesh port with change of vessel -**

The clause 9.1.a,b & c of CBEC circular which states condition to be followed in the transshipment process permits this kind of transshipment subject to filing of arrival & departure manifest as the case may be and submission of transshipment bond Form IX A,B or C. As the bond form IX A/B/C states that the transshipment process should be closed within one month of the bond date. Since continuity transshipment bond is submitted once in a year, hence one month period for closure of transshipment process is requested be considered from the date of filing departure manifest of 1st Indian gateway port.

Kindly note that the majority of the cargo to / from the East & the West coasts of Indian ports currently gets transshipped at foreign ports such as Colombo, Singapore or even Jebel Ali / Salalah, whereas, the same can be transshipped at Indian ports like Cochin, Nhava Sheva, Hazira, Mundra, Katapulli, etc. However please note that there is no direct viable and cost effective feeder network available between the East & the West coast ports of India. Hence the foreign transshipment of containers can only be done at Indian ports by using Colombo as one of the transshipment ports.

This will assist in enhancing transshipment volume further by approx. 5000 containers p.m. from Indian ports provided the bond procedure is made simple and online.

**प्रतिक्रिया/Response: The chair stated that there is specific guidelines are already in place from the board. All the stakeholders has to follow that. In case of Kattupalli, Chair has asked to see the PN/SO of the local Customs House. Further, if any problem arises, the stakeholders are directed to bring the same in notice of Commissioner (G).**

## **EXPORT COMMISSIONERATE**

4. Shri Usha N. Bhoyar, Additional Commissioner of Customs, JNCH started the discussion on the agenda points of the meeting related to the export Commissionerate.

### **I. Agenda points proposed by Brihanmumbai Custom Brokers Association (BCBA)**

#### **1. Online payment of fees/charges levied by Customs:**

Based on the applicable public notice / circulars, fees are being levied on Exporter for Shipping Bill amendments, Error rectifications of IGST refunds etc. We request for a facility to make online payment of such fees so that exporters are not required to approach the Custom House. This will help in eradicating the physical presence and expedite clearance.

**प्रतिक्रिया/Response: The chair stated that the matter will be taken up with the DG system.**

#### **2. Availability of 1st print for amendment done at CMC Centre for BTT shipments, before release of BTT Shipping Bill**

It has been brought to the notice of the Association, that for any amendments done at CMC Centre for BTT shipments, the 1st print is not available, which result in wrong declaration of SB, affecting the invoice value and export incentive of shipments.

We request that the 1st print for any amendments done at CMC Centre for BTT shipments be made available before the release of BTT Shipping Bills in larger interest of Export Trade at JNCH.

**प्रतिक्रिया/Response: The chair stated that the matter will be discussed with export Commissionerate.**

5. The members of the meeting were informed that the mode and date of conducting next PTFC meeting shall be informed well in advance. **All the Association members were requested to forward their agenda points, if any, at least 07 working days in advance by e-mail to Appraising Main (Export) Section on [apmainexp@jawaharcustoms.gov.in](mailto:apmainexp@jawaharcustoms.gov.in) for taking up the issue in the upcoming PTFC meeting.**

6. The meeting ended with vote of thanks to the Chair.

7. This issues with the approval of the Commissioner of Customs, NS-II.
8. Minutes are placed on JNCH website and also being sent through emails to the members.

*hmb*  
*17/11/2023*

**(AL Sajeed Hussain)**

सहायक आयुक्त, सीमाशुल्क / Assistant Commissioner of Customs,  
मूल्यनिरूपण मुख्य(निर्यात)/Appraising Main (Export),  
जेएनसीएच, न्हावा शेवा-II/ JNCH, Nhava Sheva-II.

सेवा में /To,

पीटीएफसी के सभी सदस्यों को ई मेल के माध्यमसे /All the Members of PTFC(through email)

प्रतिलिपि/Copy to :(ई मेल के माध्यम से )

1. मुख्य आयुक्त, सीमाशुल्क, मुंबई अंचल-II/Chief Commissioner of Customs, Mumbai Zone-II;
2. प्रधान अपर महा निदेशक, करदाता सेवा महानिदेशालय, मुंबई/The Principal Add. Director General, Directorate General of Tax Payers Services, Mumbai Zonal Unit, room No 138/139, New Custom House, Mumbai-400001 ([mzu-dgtps@gov.in](mailto:mzu-dgtps@gov.in));
3. लोकपाल , अप्रत्यक्ष कर, मुंबई/The Ombudsman, Indirect Taxes, Mumbai;
4. सीमाशुल्क आयुक्त, मुंबई अंचल-II/ Commissioner of Customs, Mumbai Zone-II;
5. सभी अपर/संयुक्त आयुक्त, जेएनसीएच, न्हावा शेवा /All ADCs/JCs JNCH, Nhava Sheva;
6. सभी उप/सहा.आयुक्त, जेएनसीएच, न्हावा शेवा /All DCs/ACs JNCH, Nhava Sheva;
7. सहा/उप आयुक्त, ईडीआई, जेएनसीएच, न्हावा शेवाको अविलंब वैबसाइट में अपलोड करने के लिए/AC/DC, EDI, JNCH, Nhava Sheva, for uploading on JNCH website;
- 8) कार्यालय प्रति/Office Copy.