



प्रधान मुख्य आयुक्त सीमा शुल्क का कार्यालय,
OFFICE OF THE PR. CHIEF COMMISSIONER OF CUSTOMS,
 मुंबई जोन -I, दूसरी मंज़िल, नवीन सीमा शुल्क भवन , बेलार्ड इस्टेट,
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**MINUTES OF THE CUSTOMS CLEARANCE FACILITATION
 COMMITTEE (CCFC) MEETING OF MUMBAI CUSTOMS, ZONE-I HELD ON
 24.05.2024 AT NEW CUSTOMS HOUSE, MUMBAI**

The 2nd meeting of the Customs Clearance Facilitation Committee (CCFC) for the Financial Year 2024-25 of Mumbai Customs Zone-I for the month of May 2024 was held on 24.05.2024 (Friday) at 11:30 Hrs in the Conference Hall, 2nd Floor, New Customs House, Mumbai under the Chairmanship of Shri Pramod Kumar Agrawal, Principal Chief Commissioner of Customs, Mumbai Zone-I.

2. The following officers/representatives attended the meeting:

SN.	Name	Designation
1	Shri Sunil Jain	Pr. Commissioner of Customs (G)
2	Shri Ashok Kumar P. Kothari	Commissioner of Customs (Audit)
3	Shri Vivek Pandey	Commissioner of Customs (Import-I)
4	Smt. Priya Goel	Commissioner of Customs (Import-II)
5	Smt. Hemlata Rai	Additional Commissioner of Customs, PCCO
6	Shri Rajesh Kothari	Additional Commissioner of Customs, (Audit)
7	Shri Mazid Khan	Joint Commissioner of Customs (General)
8	Shri Arshdeep Singh	Joint Commissioner of Customs (Export)
9	Shri Amit Kumar Nikalje	Joint Commissioner of Customs (Import-I)

10	Shri Ajit U. Nair	Assistant Commissioner of Customs, PCCO
11	Shri Dushyant Mulani	President, BCBA
12	Shri Jayant Lapsia	AILBIEA
13	Shri Sunil Gupta	Laxmi Organics
14	Shri Kamal Sharma	Laxmi Organics
15	Shri Sanjeev Harale	BCBA
16	Shri Mark S Fernandes	IMC Chamber of Commerce & Industry
17	Shri Manohar Patnaye	BCBA
18	Shri Omprakash Agrawal	SrVP, BCBA
19	Shri Santosh	Alkyl Amines
20	Shri Rahul Wani	Alkyl Amines
21	Shri Harsh Lapsia	BCBA
22	Shri. Naresh Nasta	M/s Motulmal & Co
23	Shri Sangappa Arjun Teli	FSSAI
24	Shri Venkata Reddy	Plant Protection Officer

3. At the outset, the Chairman extended his greetings and welcomed the members of the PGAs and trade representatives to the CCFC meeting of Mumbai Customs Zone-I.

4. The Chair then enquired regarding the agenda points for the meeting. Smt. Hemlata Raj, Additional Commissioner of Customs (PCCO), informed the Chair that one agenda point regarding test reports of Denatured Ethyl Alcohol has been received and she drew the attention of the Chair towards the action taken on the points discussed during the last meeting held on 29.04.2024.

4.1 In the previous meeting dtd.29.04.2024, the Chair directed the Pr. Commissioner of Customs (General) to draft a Standard Operating Procedure (SOP) of Custom Broker's roles and obligations in consultation with the BCBA. The Chair instructed the Pr. Commissioner of Customs (General) to form a committee to thoroughly review the proposal after it is submitted by Shri Dushyant Mulani and to delineate SoP.

4.2 In the previous meeting dtd.29.04.2024, the Chair had instructed Commissioner of Customs (Import-I), Shri Vivek Pandey, to consult Trade representatives with regard to issuing a Public Notice similar to that of Mumbai Zone-II i.e. Public Notice No. 02/2022 dt. 01.04.2022 regarding amendments in Bill of Entry/Shipping Bill. The Commissioner (Import-I) updated the Chair that two meetings in this regard have been conducted with trade representatives and further stated that the Public Notice is in the final stage of preparation and is anticipated to be issued shortly, since only pre-approval on file is pending.

4.3 During the meeting dtd.29.04.2024, it was mentioned that Import-II has provided segregated query information to the trade representatives, categorizing them as queries that can be answered within 2 to 3 days of being raised. Shri Harsh Lapsia informed the Chair that the Trade representatives will make a detailed presentation in the matter during the next PTFC meeting. Shri Vivek Pandey, Commissioner of Customs, Import-I, reported to the Chair that a working group consisting of three officers from Import-I and Import-II Commissionerates have been formed and the purpose of the working group is to analyze the dwell time and queries raised in Bills of Entry (Bs/E) in consultation with trade representatives.

4.4 It was further informed by the Commissioner (Import-I), that as directed by the Chair, the best practices adopted by the Mumbai Customs Zone-I are being circulated to various NAC Members of which Mumbai Zone-I PAG is a member.

4.5 In the previous meeting dtd.29.04.2024, Shri Naresh Nasta, M/s Motumal & Co., raised a concern that the instructions and examination orders prescribed by the NCTC were not fully adhered to and in few cases, 100% examination orders were being given with respect to liquid bulk cargo pertaining to Chapter 27. Additional Commissioner of Customs (PCCO) informed that the said matter was communicated to the Convener of NAC-1A for appropriate action. Shri Naresh Nasta also confirmed that the issue had been satisfactorily resolved.

4.6 Further in the previous meeting dtd.29.04.2024, Shri Naresh Nashta had expressed concerns regarding the additional comments provided by Central Revenues Control Laboratory (CRCL) in Test Reports. Principal Commissioner of Customs (General) informed that matter was promptly addressed and that the CRCL had organized a training and interactive session to resolve the matter effectively.

5. Thereafter, Smt. Hemlata Rai, Additional Commissioner of Customs (PCCO) brought up the agenda point received from All India Liquid Bulk

Importers and Exporters Association (AILBIEA) via their email dated 22.05.2024 regarding the testing of denatured Ethyl Alcohol. The Chair acknowledged the point and inquired in detail regarding the difficulties being faced by the trade in this regard.

5.1 Shri Jayant Lapsia of the AILBIEA pointed out an issue in the test reports of Ethyl Alcohol provided by Central Revenues Control Laboratory (CRCL), Mumbai Zone-I. He stated that the reports include the percentage of denaturant but does not specify whether the analyzed sample is indeed denatured Ethyl Alcohol. He claimed that this is putting the assessing groups in a dilemma and the groups are now asking for an end-use bond to release the goods. He further submitted that for ethyl alcohol to be considered denatured; a minimum of one percent denaturant is required as per BIS Standards. Therefore, any ethyl alcohol consignment containing more than one percent denaturant should be considered as denatured. He requested the Chair to take appropriate action and direct the CRCL to clearly specify in the Test reports whether the tested sample is indeed denatured alcohol or not.

5.2 Shri Sunil Jain, Pr. Commissioner of Customs (G), stressed that the primary responsibility of the CRCL is to provide the composition of the tested sample rather than to provide classification of the goods. He drew the Chair's attention to the sampling procedure, emphasizing that when a sample is analyzed, it is assumed to be a representative sample drawn in the presence of a surveyor from the department after the subject chemical has been stirred for 20 minutes. However, despite this, varied test results are observed after re-sampling in as much as initially the percentage of denaturant in sample is found to be 40 percent and after re-sampling, the percentage of denaturant is found to be to 3 percent. Hence, he emphasized the need to standardize the sampling process further.

5.3 Thereafter, Shri Harsh Lapsia explained that there are basically two methods for adding denaturants to Ethyl Alcohol viz. stirring and bubbling. He further informed that amongst the two methods, the stirring process is found to be the more efficient method. He claimed that issues arose when the proportion of denaturant in the re-denatured alcohol sample exceeded one percent significantly. Also in some cases, CRCL is specifically asking the department to verify end use, which has led Importers being asked to submit an end use bond, which is an additional burden for the Importer.

5.4 Shri Kamal Sharma representative from M/s Laxmi Organics invited the Chair's attention to the issue of the end-use bond being requested by the department. He explained that while applying for a DGFT license to import denatured alcohol, it is mandatory to specify the intended application i.e the

end use of the product being imported. Additionally, MPCB consent, factory license and data for previous five years is also required to be submitted to DGFT for obtaining the licence. He further stated that the Ministry of Chemicals & Fertilizers permits the maximum amount of denatured alcohol an Importer can import, and only then the DGFT issues a limited license for the importation of denatured alcohol. Shri Sharma emphasized that he is importing under the IGCR program of CBIC and has already provided a continuity bond; and therefore asking for another end-use bond for every import appears unnecessary.

6. After hearing the issue at length, the Chairperson assured the trade representatives of prompt resolution of the matter. He then instructed Addl. Commissioner of Customs, Import-II, (i/c) and Addl. Commissioner of Customs, (General) incharge of CRCL, to examine the matter in depth. The Chair added that as directed earlier, in case a sample does not comply with the prescribed norms, SIIB (I) needs to be informed and immediate re-testing should be conducted under supervision of SIIB(I). He also emphasized on strengthening and standardizing the sampling process.

7. Shri Harsh Lapsia, BCBA, highlighted the Port Enterprise Business Solution proposed by MbPA and expressed concerns regarding the impact of this on cargo berthing, as it would require pre-payment of all related charges by MbPA. He requested the intervention of Customs department on behalf of the Trade in the matter. The Chair suggested Shri Lapsia to write to MbPA in this regard and to further forward a copy of such representation to this office for further consideration.

8. As there were no further agenda points for discussion, the meeting ended with a vote of thanks to the Chair.

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

HEMLATA RAI

ADDITIONAL COMMISSIONER

Copy to:

1. Under Secretary, (CUS IV), CBIC, North Block New Delhi.

2. All Pr.Commmrs/Commissioners of Customs, Mumbai Zone I.
3. All the Members of the CCFC Meeting by email.
4. BCBA, Mumbai by email
5. AC/DC, EDI (with a request to upload the minutes on the Zonal website Office).