



F.NO. CUS/AG/MTG/TFC/2/2024-A/G-O/O COMM-R-CUS-IMP-I
1/2044242/2024

10-06-2024

OPEN HOUSE/INTERACTIVE SESSION ON FACELESS ASSESSMENT

An Open House/Interactive Session on Faceless Assessment was organised by Mumbai Customs Zone-I. It is noteworthy that such initiative was first of its' kind in the entire country. The Open House was jointly chaired by Shri Vivek Pandey, Commissioner of Customs (Import-I) and Smt. Priya Goel, Commissioner of Customs (Import-II) on 08.05.2024 at 11:30 AM in the Conference Hall, 2nd floor, New Custom House, Mumbai. The following stakeholders attended the meeting:

S.No.	Name	Organisation
1.	Shri Dushyant Mulani	President, BCBA
2.	Shri Paresh Thakkar	Vice President, BCBA
3.	Shri Hiran Ruparel	Vice President, BCBA
4.	Shri Sanjeev Harale	Senior Vice President, BCBA
5.	Shri Manohar Patyane	BCBA
6.	Shri Harsh Lapsia	BCBA
7.	Shri Kiran Rambhia	BCBA
8.	Shri Ganpat Korde	BCBA
9.	Shri Maruti R. Godpe	BCBA
10.	Shri Sanjay C. Shingote	BCBA
11.	Shri Ashok K R Saini	BCBA
12.	Shri Gopal K Tailan	Customs Broker
13.	Shri Mark S. Fernandes	IMC Chamber of Commerce & Industry
14.	Capt. Ram Iyer	President, MANSA
15.	Capt. P P Singh	MANSA
16.	Shri Mayur Kapasi	Import Manager, M/s. BASF India
17.	Shri Sangappa Arjun Teli	Technical Officer, FSSAI
18.	Dr. Karuna Dhale	Asst. Director(Technical), FSSAI WR
19.	Shri Bipin Mahagaonkar	Customs Broker
20.	Shri Tejas Desai	Customs Broker
21.	Shri Bhavesh D. Sutar	Customs Broker
22.	Shri Avinash S. Thorat	Customs Broker
23.	Shri Ashokchand L Rajput	Samsara Shipping
24.	Shri Mitesh Lodeya	Customs Broker
25.	Shri A. Udayasankar	PQ Officer
26.	Shri Balram Meena	Asst. Director P.Q

2. The following officers attended the meeting on behalf of the Department.

S. No	NAME OF THE OFFICER	DESIGNATION
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1.	Shri Mallinath Jeure	Addl. Commissioner of Customs (Import-I)
2.	Shri Amit Kumar Nikalje	Joint Commissioner of Customs (Import-I)
3.	Shri Mahesh Kumar	Deputy Commissioner of Customs (Import-II)
4.	Ms. Radha Arvindakshan	Asst. Commissioner of Customs (Import-I)
5.	Shri R N Pathak	Asst. Commissioner of Customs (Import-I)

3.1 Shri Vivek Pandey, Commissioner of Customs (Import-I) and Smt. Priya Goel, Commissioner of Customs (Import-II) highlighted the fact that the PTFC and CCFC meetings are being organised every month on regular basis with intent to facilitate the trade, where the issues flagged by trade and other stake holders are addressed on real time basis.

3.2 However, keeping in view of the recommendations made by the FFFAI (Federation of Freight Forwarders Association of India) and directions of the Board, the initiative has been made to conduct Open House/Interactive Session on Faceless Assessment. Mumbai Customs Zone-I has undertaken several **trade facilitation measures** such as Conducting Outreach Programs/Interactive Session/Sectoral Meetings with Importers, CB's etc. and meeting with top importers of the Mumbai Customs Zone-I was also organized in the month of Feb 2024 so as to know the difficulty/grievances, if any, being faced by them while clearing the Import Consignment at INBOM1.

3.3 Further, training on the subject "IPR and EPR Waste Management" was imparted to trade members through both online and offline mode for making them well aware of the extant rules and regulations. A Review Meeting with Chartered Engineers was also conducted and training on BIS was imparted to officers and trade representatives. Further, four (04) Public Notices have been issued by Import-I & Import-II Commissionerate for facilitation of the trade. A meeting with Participatory Government Agencies (PGA) along with trade representative was also held wherein the issues raised by the trade representative were discussed at length and the suggestions were made accordingly to PGAs for initiating necessary action at their end for expeditious clearance of the cargo. AEO Outreach Programmes are also being conducted on regular basis.

4. Shri Mallinath Jeure, Additional Commissioner of Customs (Import-I) started with a PowerPoint Presentation and submitted that there has been a **27.16% increase** in Revenue realization in comparison to last F.Y. 2022-23 by Mumbai Customs Zone-I. Also, there has been a **11.89% increase** in Revenue realization against the target for the F.Y. 2023-24.

Further, he submitted before the chair that certain agenda points pertaining to Delay in Assessment, raising of high no. of queries, giving wrong examination order, denial of exemption notifications, non-issuance of speaking orders, raising repetitive queries etc. have been received only from **BCBA** (Brihanmumbai Custom Brokers Association).

5 . Shri Dushyant Mulani, President, BCBA stated that with Faceless Assessment coming in, Authority with Jurisdictional Commissioners has lessened and the same is now divided amongst other Commissionerate where the BoE moves at different stages. He also pointed that TSK section has limitations regarding grievance redressal in faceless assessment. AEM is not working to its full potential. He further added that statutory timelines w.r.t. clearing a BoE have to be adhered to in letter and spirit.

6.1 Shri Vivek Pandey, Commissioner of Customs Import-I, informed that with RMS in place, 85% of the BoE's are RMS Facilitated. Out of the remaining 15%, more than 65% (Eg: Data from Advait for FAG 4 for March 2024 shared in the PPT) have been cleared in less than 08 hours. This data of 'Dwell Time' and '% of Query Raised' is being monitored at all India level by the NACs (National Assessment Centres) headed by various Chief Commissioners. Also, quality of queries is being monitored, assessed and supervised at the highest levels. Chapter/item specific grievances have to be addressed to the respective NAC heads for uniformity in classification and valuation.

6.2 He further informed that a study team of Customs and BCBA officials has been formed, which is working together on Query Analysis. The emails received in the TSK Section are very general for e.g. "please expedite my BoE". Specific nature of the grievance/feedback should be received from the Trade. Trade needs to flag some specific bills which will be reviewed thoroughly and necessary course of action will be taken.

7. The Trade also pointed out that the Query given by the FAG Appraiser in the late hours of the evening such as on or after 7:30 pm is usually replied on the next day, which increases the Dwell time at the end of Customs and Importer both. Further B/E is pushed from FAG to PAG without proper basis by the Appraising Officer.

8. In reply to the above issue, Smt. Priya Goel, Commissioner of Customs (Import-II) clarified that the 'pushing' of a BoE is not done on random basis as the same is scrutinized and approved by an officer of the rank of Additional/Joint Commissioner of Customs. Also, the NAC meetings monitor the Dwell Time and the Query % regularly. Further, a Google Sheet may be created where specific grievances/suggestions can be posted by the Trade and the Customs can review it periodically from time to time.

9. Shri Mark Fernandes, Member, Board of Directors at IMC Chamber of Commerce and Industry highlighted that an advance Bill of Entry is filed before the vessels arrives at the port so that Assessment and other Customs formalities can be finished and once the entry inward is granted and IGM has been finalized, then Goods Registration can be done. However, 3rd query and further queries is raised by the Customs officer which defeats the entire purpose. Shri Mallinath Jeure, Additional Commissioner of Customs (Import-I) reiterated that the Query % and the nature of the Query is being monitored at the highest level.

10.1 Shri Mayur Kapasi, Import Manager, M/s. BASF India suggested to post an Appraiser/EO/DC in Groups dealing in Chemicals, who is more proficient in this domain and possibly with a Chemistry background. Also, the examination Orders such as "NOC required from FSSAI" in case of import of certain dispersion chemicals is not appropriate and should be looked into. Further, MSDS certificate should be accepted at the time of clearance of imported chemicals just like MTC (Mill Test Certificate) in Steel Products.

10.2 Smt. Priya Goel, Commissioner, Import-II pointed out that officers posted in Groups are proficient with focus on trade facilitation and revenue safeguarding. In regards to incorrect examination orders, specific Bills of Entry may be brought to the notice of the Chair. Shri Vivek Pandey, Commissioner, Import-I stated that w.r.t. MSDS certificate, a representation by the trade can be made so as to take up the matter with Board.

11. Captain P.P Singh, Director, M/s. Shaan Marine Services Pvt. Ltd. and representative of Maritime Association of Nationwide Shipping Agencies - India (MANSA) said that boarding of vessels by Customs and Granting Inward/Outward Entry in ICES system process is long and time taking. He added that all vessels should not be mandatorily boarded by Customs Officer. Shri Vivek Pandey, Commissioner advised him to take this issue to the next PTFC which is headed by PC(General).

12. The Chair underlined the fact that Chief Commissioner of Customs, who is the convener of that particular NAC, under which the imported goods fall, should be approached with a specific grievance. He cited the most recent examples, wherein the issue of 'Upholstered Fabric used for non-domestic furniture', attracting BIS or not, was referred by Chennai Customs to Pr. Chief Commissioner, Mumbai Customs Zone-I (Convener of NAC 6 under which imported goods fall), Chennai being the port where the goods were imported, for issuing necessary clarification; and the issue was sorted out quickly.

13. Shri Mallinath Jeure proceeded further with the presentation and explained that all FAGs under the jurisdictional purview of Import -I & II Commissionerates have been performing well by keeping the Dwell Time and Query % much below the National Average. Shri Vivek Pandey emphasized that recently some important decisions have been taken by the NAC (Automobiles and Instruments and Misc. Products/Project Imports) to improve and build upon the practice of uniformity in assessment across all FAG sites.

The meeting concluded with a vote of thanks to the Chairpersons.

This issues with the approval of Commissioner (Import-I) & Commissioner (Import-II).



(Mallinath K Jeure)

Addl. Commissioner of Customs,
Appraising (General), Import -I,
NCH, Zone-I.

Copy to: -

1. PS to Pr. Chief Commissioner of Customs, Zone-I, NCH, Mumbai for information.
2. The Pr. Commissioner/Commissioner of Customs, Mumbai Customs Zone-I, NCH.
3. The Addl./Joint Commissioner of Customs, Mumbai Customs Zone-I, NCH Mumbai.
4. The Asst./Dy. Commissioner of Customs, Mumbai Customs Zone-I, NCH Mumbai.
5. The Asst./Dy. Commissioner of Customs, EDI, for uploading in Customs website.
- ✓ 6. All the members of trade through E-mail.
7. Notice Board.
8. Office Copy.