

	<p>कार्यालय, आयुक्त सीमा शुल्क, आयात-I</p> <p><b>OFFICE OF THE COMMISSIONER OF CUSTOMS (IMPORT-I)</b></p> <p>मूल्य निरूपण( सामान्य), पृथम तल, नवीन सीमा शुल्क भवन</p> <p><b>APPRAISING (GEN) 1<sup>ST</sup> FLOOR NEW CUSTOM HOUSE,</b></p> <p>बॅलार्ड इस्टेट, मुंबई-I</p> <p><b>BALLARD ESTATE, MUMBAI – 1, Fax-022-22757402,</b></p> <p><b>Email – Ag1.mumbai@gov.in</b></p>
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**MINUTES OF THE MEETING WITH PGAs HELD ON 20.10.2023**

A Meeting with Participating Government Agencies (PGAs), was held on 20.10.2023 at 03:00 PM in the Conference Hall, 2<sup>nd</sup> floor, New Custom House, Mumbai. The meeting was chaired by Shri Vivek Pandey, Commissioner of Customs (Import-I). The following officials from PGAs & Stake holders attended the meeting:

Sr No	NAME OF THE MEMBERS	ORGANISATION
1.	Shri Brajesh Mishra	Jt. Director, Plant Quarantine
2.	Shri Jayant Kumar	Dy. Drug Controller, CDSCO
3.	Dr. Karuna Dhale	Asstt. Director, FSSAI
4.	Ms. Mukta Shrivastava	Chemical Examiner, Gr. I, DYCC/CRCL
5.	Md. Habibullah	Chemical Examiner, Gr. II, DYCC/CRCL
6.	Shri Harsh Lapsia	BCBA
7.	Shri Jayant Lapsia	AILBIEA

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

Sr No	NAME OF THE OFFICER	DESIGNATION
1.	Ms. Priya Goel	Commissioner of Customs (Import-II)
2.	Shri Mallinath K. Jeure	Addl. Commissioner of Customs (Import-I)
3.	Shri Neelesh Rautkar	Addl. Commissioner of Customs (Import-II)
4.	Shri Amit Kumar Nikalje	Joint Commissioner of Customs (Import-I)
5.	Shri Mahesh Kumar	Asstt. Commissioner of Customs (Import-II)
6.	Shri Sushil K R Reddy	Asstt. Commissioner of Customs (Import-II)

3 . At the outset, Shri Mallinath K Jeure, Addl. Commissioner of Customs (Import-I) extended his greetings and welcomed the officials from PGAs and stake holders.

4. Shri Mallinath K Jeure, Addl. Commissioner of Customs (Import-I), informed that Agenda points have been received from the BCBA for today's meeting, which is regarding the issues being faced by trade and industry of delay in clearance due to delay in testing, processing of permission and scrutiny of documents by several Participating Govt. Agencies (PGAs) namely Dy. Drug Controller, FSSAI, DYCC/CRCL and Plant quarantine. The Chair then noted the grievances and suggestions made by trade and took up the issues for

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discussion as below.

**I. Dy. Drug Controller :**

Shri Harsh Lapsia, BCBA raised issue of delays in granting of NOC / permissions and stated that at present, dual use NOC/permission is taking 10 – 20 days instead of approximately 3 working days earlier and further documents required by CDSCO needs to be submitted in manual/hard copy. Also trade requested that preference may be given to AEO title holders while granting NOC.

Shri Jayant Kumar – Deputy Drug Controller informed that:

- CDSCO has already published the Guidance documents for requirement of documents and in the condition, where dual use NOC are granted by CDSCO and same are readily available in the public domain at [www.cdsc.gov.in](http://www.cdsc.gov.in).
- CDSCO has opted online system for the processing of the NOC application, therefore, the request for acceptance of manual documents either for application or for query reply may not be feasible.
- During Covid-19 it was observed by CDSCO that some of the Importers/trader misused the permission granted under Dual use NOC, therefore mandatory reviewing of the documents is necessary with regard to end use for further conversion/purification as a drug.
- On the grievances of trade Shri Jayant Kumar, stated that following documents are not submitted by the importers at the time of application:
  - a. Undertaking submitted is not in the proper format/ further or not duly signed by the deponent.
  - b. Multiple Applications submitted for the same product in different quantity instead of single application
  - c. In case of Food permission/license is required from the FSSAI for both trader and Actual User.
  - d. Flow chart for both process and molecular change is required for the drug used for conversion to other drug.
  - e. Reconciliation data is mandatory for the subsequent applications, which is not submitted.
- Shri Jayant Kumar informed that for expeditious processing of dual use NOC, following steps may be initiated by trade while making application as below:
  - a. Purchase order based application-especially in case of Dual Use NOC: Importers may apply for NOC on the basis of purchase order and utilize the same across multiple shipments.
  - b. In case of commodities such as Propyl Alcohol, Phenol, Citric Acid etc. there is option of application-based-NOC, whereby NOC may be granted immediately upon submission of application by sending an email to CDSCO Western Zone office stating the nature of the commodities and requesting for release based on application.
  - c. Proper application with legal undertaking and reconciliation data will expedite the NOCs.
  - d. Legal undertaking to be on Rs. 300 or Rs 500 Stamp paper henceforth as against current practice of submission on Rs. 100 Stamp Paper.

Shri Jayant Kumar further informed that the CDSCO Office shall be holding a

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webinar in 2nd week of November 2023, to guide the Trade towards proper declarations and accurate applications, so that the time taken for processing may be expedited and potential to raise queries be reduced. The Chair directed Shri Jayant Kumar to explore into the possibility of drawing a SOP/synopsis of guide notes in bullet format w.r.t. liquid bulk Cargo.

## II. **FSSAI** :

Trade raised issue of delay of 10-15 days in availability of test reports after testing by NABL labs and other labs. Further trade stated that there is no timely collection of samples at docks and samples are not collected as per slot given in the system and lack of helpline number for coordination of same.

Dr. Karuna Dhale, Assistant Director, FSSAI, informed that FSSAI has set deadlines for testing of samples as 05 days for normal testing and 10 days, in case of microbiological testing. However, she assured that specific cases may be discussed. She further stated that after filing of application and payment of fees in Food Import Clearance System (FICS), the CHAs are not acknowledging the appointment, due to which, applications can't be processed further and sample cannot be collected as per allotted time. The Chair drew her attention toward grievance raised of considerable time gap between final certification by Lab and NOC given in the system, to which she replied that in a few cases it has happened which was addressed promptly.

## III. **DYCC/CRCL** :

Trade raised issue of delays in testing and issuance of reports from the Joint Director, Chemical Laboratory (DYCC). Ms. Mukta Shrivastava, Chemical Examiner, Gr. I, replied that sometimes machines installed at DYCC goes out of order, which causes delay in testing. Also literature available at DYCC does not cover whole spectrum of samples which are sent for testing, which some time causes slight delay.

## IV. **Plant Quarantine** :

Trade has raised Difficulty in obtaining NOC and downtime of online services was reported by the trade, to which, Shri Brajesh Mishra, Joint Director, PQ assured that the system is completely online, transparent, and connected with EDI Systems in Import as well as export and moreover the issue reported did not pertain to Mumbai Customs Zone I, which was confirmed by BCBA and duly noted by the Chair.

5 . Shri Mallinath K Jeure, Addl. Commissioner of Customs (Import-I), suggested the chair to direct all the PGAs to issue a Public Notice with SOP for drawing samples, guidelines for submission of required documents, so as to spread awareness amongst the Trade and to avoid delay at the end of PGAs. The Chair agreed with the proposal and requested all the PGAs to do the needful.

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

This issues with the approval of Commissioner (Import-1) & Commissioner ( Import-2).

(S K R Reddy)  
Asstt. Commissioner of Customs

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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 Commissioner of Customs (Import - I, Import-II), NCH, Mumbai
3. The Addl. Commissioner of Customs, Appraising (General, Import-I & II), NCH, Mumbai.
4. The Asst./Dy. Commissioner of Customs, EDI, for uploading on Customs website.
5. All the PGAs
6. All the members of trade through E-mail.