



**OFFICE OF THE COMMISSIONER OF CUSTOMS : PUNE  
GST BHAVAN, 41/A, SASSOON ROAD, PUNE-411001**

**MINUTES OF THE 74th PERMANENT TRADE FACILITATION COMMITTEE  
MEETING HELD ON 17<sup>th</sup> February 2021 AT 16.00HRS.**

The 74<sup>th</sup> Permanent Trade Facilitation Committee Meeting of the Pune Customs Commissionerate was held on 17/02/2021 at 16.00 hrs via Video Conferencing under the Chairmanship of Shri Pankaj Dwivedi, Commissioner, Customs, Pune.

2. The following members from the Trade and Industry attended the meeting:-

S.No.	Name of the Member (Smt/Shri)	Representing
1	Shri R.D. Bhargava	MCCIA
2	Shri Pradeep Kale	PCHAA
3	Shri Anand Paranjape/Smt Tanishka Paranjape	EXIM Management Services
4	Shri Vinod Sharma	PCHAA
5	Shri Somanth Joshi	Glowind
6	Shri Santosh Ingalkar	KSH Distriparks Pvt. Ltd.
7	Shri Jalinder Thite	Trade Representative
8	Shri Kamta Mishra	Trade Representative
9	Shri Ajay	DHL
10	Shri Bhagwan Singh	Dolphin

3. Following Officers from the Department attended the meeting:

S.No.	Name of the Officer	Designation/ Formation
1	Shri Dhruva Seshadri	Jt. Commissioner
2	Shri V. Mangaraju	Jt. Commissioner
3	Shri Motilal Shete	Deputy Commissioner, Preventive
4	Shri Amit Nayak	Deputy Commissioner, Ratnagiri/Dapoli /Sindhudurg Division
4	Smt Himani Dhamija	Deputy Commissioner, Pune International Airport
5	Shri Pancratius Kiro	Assistant Commissioner, TPSC
5	Shri Bibekanand Nayak	Assistant Commissioner, ICD Talegaon
6	Shri Alok Kumar Singh	Assistant Commissioner, ICD Dighi, ICD Pimpri, and ICD Chinchwad
7	Shri Mahesh Jadhav	Superintendent (TPSC)
7	Shri P B Jagtap	Inspector (TPSC)

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4. The Chairman welcomed all the PTFC members and departmental officers present in the meeting via Video Conferencing.
5. Shri Pancratius Kiro, Asstt. Commissioner (TPSC), welcomed all the members.
6. Shri Dhruva Seshadri, Jt. Commissioner introduced with trade members and discussed the points mentioned in the Agenda raised by Trade.

Point 1:- Shri Anand Paranjpe, Exim Management had submitted his point regarding A.D. code registration. In Pune Commissionerate port code is different and in JNCH port code is same, hence 38 or more CFS' are covered under one registration. Therefore, he has requested that if the same procedure will be followed in Pune, then it is more simple for the Trade/assessees. If Pune Customs shift the "EDI registration" to "EDI Customs headquarter Pune" then the same can be used for all 5 ICDs which are registered under Pune Customs. Alternatively, the EDI department of Customs Pune has to register them to all ICDs and sharing the documents to Preventive. It will save time and process if the exporter contact will be shared and verification will be online process.

Further he has discussed about review of the P.N.37/2020 para no.6 regarding first time import verification part. He has raised a query that whether the Customs broker has to go and register themselves or when he will register as a first time exporter to ICD they will have to register. If ICD wants then they can send to Preventive Section, but need clear directions as to whether it is mandatory or if it is to be sent or not, is the choice of A.C./D.C. of respective ICDs.

On this point Shri Dhruva Seshadri, Jt. Commissioner assured that the department will look in to the issue and will see if any changes in the Public Notices are warranted.

Point 2:- Shri Vinod Sharma, Best Agencies discussed about the Public Notice pertaining to first time importer verification. He said that, in case of manufacturer importer, he has to give intimation regarding where he is filing the Bill of entry and the respective ICD will forward the same to Headquarters. And the manufacturer does not have with him the permission from the SIIB for examination error. Presently even the manufacturer also need the NOC to be taken from SIIB.

Secondly, he submitted that in some cases, the container had already reached at the ICD and after that it takes 6 to 7 days for registration and examination and getting permission. So he has requested that, if the importer is a manufacturer importer, then intimation should be accepted, and if he is a trader then SIIB can examine the goods as per their norms.

Shri Pankaj Dwivedi, Commissioner Customs responded

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that, the procedure related to first time importers will be examined and changed if required. As regards A.D. code registration, it was informed that the situation in JNCH and in Pune Customs is different. However, Pune Customs will see its feasibility in the System and if it is feasible in the System, then the reference will be made with the Board, and if there is any possibility then the department will try for it.

Point 3: Shri Pradeep Kale, Customs House Agents Association, Pune present his point regarding delay in generation of the LEO/Gate pass of shipping bills. He informed that, sometimes it takes 4 Hours. The operation staff and Custodian staff are required to wait till Shipping Bill or Gate Pass gets generated and then only Container or CBT can move out of ICD. The same should generated immediately as soon as the LEO is given by the Customs Officer.

Shri Dhruva Seshadri, Jt. Commissioner, informed that the department will take up the issue with Directorate of Systems and further requested them to submit as sample, some generated shipping bills along with details of the time taken for LEO (along with relevant screen shots) to the Customs Hdqrs, for ease of reference.

Point 4: Shri Pardeep Kale, PCCHA submitted the point regarding the proposed changes in filing of the BOE as introduced vide the Finance Act, 2021, so that the dwell time will be down for Import Containers. In the sub-Section (3) of Section 46 of the Customs Act, as per the Budgetary changes, the Bill of Entry needs to be filed immediately, not be later than the end of the day of arrival of Vessel. He also submitted that there was no holiday exemption for late filing of Bill of Entry, which may attract late filing charges.

Shri Dhruva Seshadri, Jt. Commissioner, Customs asked for a clarification as to whether this issue was being faced specifically in the jurisdiction of Pune Customs, especially as, in the case of ICD's, the period of 24 hours is counted not from the date of arrival of the vessel but at the arrival of the Customs station, and hence ample time was available for filing.

In response, Captain Samarth, stated that the issue had arisen initially in Mumbai Port, and as far as the ICDs are concerned, Customs Brokers were getting sufficient time; hence in ICD's located in the jurisdiction of Pune, the Trade is not facing such problems.

Point 5: Shri Pradeep Kale, PCCHA submitted point that, when BE numbers are not being generated due to issues faced in EDI system or even when the EDI System is down. Hence he has requested that late filing waiver should be automatically considered by the System instead of separate Public Notice.

Shri Dhruva Seshadri, Joint Commissioner, discussed the

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point and explained that the Bill of Entry (Electronic Integrated Declaration and Paperless Processing) regulations 2018, provided for waiver of late fee by the proper officer in deserving cases such as system problems being faced, and that the officers in the jurisdiction of Pune Customs were waiving the charges accordingly in deserving cases.

Point 6:- Shree Rajdeepak Bhargava, Director, Avignon Private Ltd. Pointed out the issue which the Trade are facing on a regular basis. Due to changes made in Notfn. No. 50/2017 the CHA 47079000 were put under condition 9 which is mandatory for IGCRD instead of End use Bond which was the practice. The opinion of Trade is that, there should be at least a 15 day notice provided before such budgetary changes were made. If the Trade had been given sufficient notice with the help of digitalisation of process, such issue would have been easily resolved.

He also submitted that the new CAROTAR Rule should be simplified by asking FTA members to upload the COO issued on the website so the Indian Customs or any authority can access the same if they have any doubt.

Shri Dhruva Seshadri, Joint Commissioner, replied to PCCHA members that budgetary changes cannot ordinarily be informed in advance and that the occurrence mentioned was a specific one which had been resolved by Systems already. Further he informed that the uploading of COO by different countries/issuing authorities is not uniform and to the extent possible, Pune Customs officers were verifying the details from the websites of issuing authorities so as to carry out assessment in a minimally intrusive manner.

Further, Jt. Commissioner informed about e-BRC, he has requested to the Trade to ensure that the bank account details and the A.D. Code which are mentioned on the Shipping Bill is the actually the same where the remittance is to be received. And the same are to be conveyed to the foreign buyers also, so that it will reduce the mismatch data.

**The points raised during the previous PTFC meeting by PCHAA members were as follows:**

**Para 5. (sub para 8 C )**

The members had raised the point that Custom Broker with AEO-LO Status to be printed on Shipping Bill and Bill of Entries. The Customs Broker who is awarded an AEO-LO status, his AEO-LO Status should be printed on shipping bill and Bill of Entries as the case may be. That will help as.

- a. A Company will easily be recognized that the Customs Broker is AEO.
- b. An Officer will come to know that the Customs Broker is AEO, and identity will be easily established. That will encourage more CBs to become AEO. They insisted that it would be easier to offer additional benefits to Customs Broker via System. The Chairman enquired whether the importers status was being detected by

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systems and applicable priority in systems/RMS was accorded. On this Trade replied affirmative, however the same was not seen for customs brokers which was necessary. Hence to be taken up with Systems.

**(AC EDI Section)**

**Action Taken-:**

AC (EDI) replied that the request vide an email dated.07.08.2020 has been sent to D G System and reply is awaited. Also letter dtd.14.12.2020 is sent to CCU Pune Zone requesting to take up the issue with D.G.System.

**(Para closed)**

**Para 6.** The members further raised the point For the Customs Broker Licenses issued by Pune Custom Commissionerate, Principal and Parent Commissionerate is Pune. When we get new Customs Broker License or after we get it renewed, we need to register through Mumbai Customs House CB Section for EDI upload. We do agree that in earlier days the System Manager was not stationed in Pune and hence this was being done by Mumbai System Manager. But now the situation has changed and Pune Commissionerate is having separate System Manager.

They requested to take this matter with D.G. Systems / CBIC and allow to register Pune Licenses through Pune System Manager in the EDI System.

**( AC CB Section)**

**Action Taken:**

It was informed that the matter had already been taken up, as a letter dtd.14.12.2020 had been sent to CCU Pune Zone, requesting to take up the issue with D. G. Systems.

**( Para Closed )**

**Para 7.** The members raised the point regarding CAROTAR the query memo which is asking for Form-I after hours and again next day they are asking for article 3.4, 3.5 & 3.6 to be uploaded, which makes the process very tedious. Moreover, asking for Country of Origin, when the exporting country is giving all the details, it appears that there is duplication of work in faceless assessment and time consuming. In the system after uploading the Form, the system raised the issue of costing next day due to which the containers are getting delayed.

**(DC Technical)**

**Action Taken :**

Deputy Commissioner (Tech) replied that compliance report regarding above point has been called for from all Customs Divisions / Ports and examined. In the matter. It is to report that all the Bills of Entry are assessed by the Faceless Assessment Group (FAG). None of the FAG has called for the Form-I or any other document under CAROTAR,2020 from importers. However, the importer are required to produce the original Country of Origin (COO) certificates and which needs to be physically defaced

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and defacing remarks is mandatory in ICES before giving Out of Charge (OOC).

( Para Closed)

( DHRUVA SESHADRI )  
JOINT COMMISSIONER  
CUSTOMS, PUNE

F.No. VIII/Cus/Tech/48-97/ptfc/15-16/Pt.III  
Pune, 16/12/2021

**Copy to:-**

1. The Director General of Tax Payer Service, New Delhi – 110 109.
2. The Director(Customs), CBEC, New Delhi
3. The Chief Commissioner, CGST & Customs, Pune Zone
4. Dy./Asstt.Commissioner of Customs all Custom ICDs/Pune Airport/ Air Cargo
5. Dy./Asstt.Commissioner of Customs, Ratnagiri/Sindhudurg/ Dapoli Division
6. All members of PTFC, Pune
7. PCHAA/MCCIA/DCCIA, Pune
8. DGFT, Pune
9. Notice Board and Website/EDI Section
- 10.Master File