

# MINUTES OF THE PTFC MEETING HELD ON 22.04.2025 at 15:30HRS

The Permanent Trade Facilitation Committee (PTFC) meeting was held on 22.04.2025 at 15:30 HRS through video conference. The meeting was chaired by Shri A.Manimaran, Commissioner of Customs, Chennai-IV (Export)Commissionerate.

2. The following officers of Export Commissionerate and members of the trade attended the meeting:

- i. Shri Lakshmikantha D, Additional Commissioner
- ii. Shri N. Mohan, Deputy Commissioner
- iii. Shri S. Babu Kumar Jacob, Deputy Commissioner
- iv. Smt. JayalakshmiVeerasamy, Assistant Commissioner
- v. Shri P. V. Sudhakaran, Assistant Commissioner
- vi. Shri S. Sriramamurthy, Assistant Commissioner
- vii. Shri C. Bakthavatchalam , Assistant Commissioner
- viii. Shri M.V Ravi Kumar , Assistant Commissioner
- ix. Shri S. Pasumpon , Assistant Commissioner
- x. Shri Rajesh Kumar , Assistant Commissioner
- xi. Shri M. Stanley, Assistant Commissioner
- xii. Shri R. N. Sekar, President, CCBA
- xiii. Shri Natarajan, Secretary, CCBA
- xiv. Shri Divakaran Nair, Vice President, CCBA
- xv. Shri C.V.Karunakaran, Vice President, CCBA
- xvi. Shri R. Kumar, Treasurer, CCBA
- xvii. Shri S. Sivashankar, CCBA
- xviii. ShriSattva Padmanabhan, NACFS
- xix. Smt. Selvanyagi, Joint Director, FIEO

3. Shri Lakshmikantha D, Additional Commissioner, extended a warm welcome to all the stakeholders and members who have gathered for the 1<sup>st</sup> PTFC meeting of the current financial year 2025-2026 and commenced the meeting and with the permission of Shri A. Manimaran, Commissioner of Customs, he invited Shri Sekar, President of CCBA, to present the agenda point.

#### FRESH POINTS RAISED FOR THIS PTFC MEETING

**4. Agenda Point No.1:** Currently it is seen that officers at most of the CFSs are closing the open order by 1PM, as a trade facilitation measure, this cutoff time has to be extended upto 4pm. This facility will give a great relief to the EXIM trade for faster clearance and also to decrease the dwell time as well as reduction of transaction cost.

**4.1** Shri Sekar, CCBA President discussed agenda point of the current practice followed in examination process, stating that officers at most of the CFSs are closing the open order by 1:00 PM. He requested to follow the previous practice of allowing open order until 4:00 PM and also depending up on the urgency of the Bill of Entry, the officers can take a call. In response, Shri A. Manimaran, Commissioner of Customs questioned why CHAs are not utilizing the available morning hours effectively. Shri Sekar opposed stating CHAs are available in the morning hours, but the Commissioner said he has a record of CHA's timings. He further stated that extending the open order to 4:00 PM leaves insufficient time for officers to complete examinations during daylight.

**4.2** Shri Sekar, CCBA President argued that a standing order permits two examination windows—one before lunch and one post-lunch—and emphasized the challenges i.e., traffic and the distant locations of CFSs posed by CHAs. He also requested that this was not a new request but a continuation of an earlier practice. However, the Commissioner responded that the old system was not efficient, and thus necessitated the change. He pointed out that some CHAs arrange containers only by 5:30 PM, which delays the start of examinations by 5:45 PM—making it difficult for officers to work in the dim light. Shri Sekar, CCBA President mentioned that now with the functional ICETAB system it is possible to extend the timings, unlike the limitations faced under the previous process. The Commissioner remarked that shifting arguments based on convenience is not acceptable.

4.3 Shri Natarajan, Secretary, CCBA, added that CHAs now begin work in

the morning and proposed that examinations be conducted in two sessions: the first before lunch (around 11:30 AM) and the second between 2:00 PM and 3:00 PM, so that by 6:00 PM everyone leaves CFS. The Commissioner then asked Shri N Mohan, Deputy Commissioner, if there had been any deviation from the standing order. Shri N Mohan, DC confirmed that officers are present on time in all CFSs, but most CHAs tend to arrive post-lunch, with only a few are utilizing the morning hours. Shri Sekar clarified that CHAs often arrive around 11:30 AM or 12:00 PM because BEs are assessed at FAG locations, which delays the process. The Commissioner responded saying that CHAs must adhere to the prescribed timelines to avoid late examinations. Shri Natarajan requested that open orders be permitted until 3:00 PM to facilitate examinations in two sessions. Commissioner directed Shri Lakshmikantha D, ADC and Shri N Mohan, DC to follow the timings as requested.

**4.4** However, Shri Sekar further requested that the timings be extended to 4:00 PM. The Commissioner responded that if CHAs cannot reach the CFS by 3:00 PM, they should plan to arrive by 9:45 AM the next day, so the open orders to be issued by 11:30 AM and BEs to be assessed accordingly. He emphasized that it is not feasible to track each Bill of Entry manually, and extending the open order beyond 4:00 PM could delay examinations until 7:30 or even 8:00 PM. To maintain operational efficiency, extending the timings is not a viable option. Shri Sekar then requested that, in genuine emergency cases, officers be allowed to extend examination timings. The Commissioner denied extension but agreed to consider such requests on a case-by-case basis, if submitted in writing.

**4.5** The Commissioner stated that delays often arise due to lack of labor or container handling machinery, with examinations sometimes start at 5:30 PM. He urged CCBA to coordinate better, conduct internal meetings, and begin the process earlier in the day to ensure that all open order to conclude by 3:00 PM for efficient operations during daylight hours, as most of the examination of import consignments are risky ones selected by RMS.

# (Action to be taken – DOCKS ADMIN)

# 5. Discussion on the point raised during the previous PTFC meeting:

**Exports of Crust/semi-finished leather:** Export duty of 30% on crust leather has been removed in the recent budget. Therefore, it is requested that a procedure to carry out customs examination has to be defined similar like exports of finished leather.

**5.1** The President of CCBA stated that the import duty on crust leather has

been removed. He also noted that, as per the issued guidelines, CLRI is responsible for drawing samples of finished leather. However, for crust leather, CLRI is currently not drawing samples, as they have not received any directions from the ministry. He stated that Customs is now insisting on verifying whether the leather is crust leather, due to the duty exemption. In this context, he requested Customs either to draw samples for confirmation or a parameter to be defined for leather experts to examine the goods and determine whether sampling is necessary. He emphasized the need for a any methodology to avoid disrupting export activities.

**5.2** The Commissioner responded that the matter has already been taken up with the Chief Commissioner's office, with a request to take it to the Board. The Commissioner also mentioned that CLRI, the Council for Leather Exports, and leather importers have suggested to relook the requirement for sample drawal during examination, especially now as there is duty neutrality. Also, the Commissioner clarified that the circular mandating sample drawal was issued by the CBIC, and is not a local directive. Hence, any modification or exemption must be approved by the Board, as they are the competent authority to amend such instructions. He acknowledged and agreed with the concerns raised by the exporters and the Council for Leather Exports, but stated that local deviation from CBIC guidelines is not allowed.

**5.3** The CCBA President informed the CLRI has recently issued a communication to the Leather Exporters Association, stating that they have come up with willingness to accept a simple bond for sample drawal. In response, the Commissioner questioned the legal basis of such a move, asking, from where do CLRI derive the authority. The Commissioner clarified that while CLRI is an expert body to test and give report, it cannot make policy decisions. The Commissioner then asked Shri Lakshmikantha D, ADC, whether any such communication from CLRI had been received. The ADC responded that he had not seen any such document.

**5.4** The CCBA President stated that Customs is currently not in a position to draw samples and send them to CLRI to confirm if the leather is crust leather or not. The Commissioner responded by stating that giving any instruction regarding drawal of samples, is deviating from CBIC instruction. He further added, he cannot assume that the duty aspect is the sole reason for conducting examinations or for allowing local practice, as a CBIC official we are bound to CBIC instructions. However, he assured that the issue has been taken up to the Board.

#### (Action to be taken – DOCKS ADMIN)

6. As there were no further points raised for discussion, the meeting was concluded with a vote of thanks to the chair person.

# KISHOR SASIYUTHAMAN NAIR ADDITIONAL COMMISSIONER Appraising Main Export Commissionerate Chennai Customs.

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- 1. All the Stakeholders.
- 2. EDI with request to upload in Chennai Customs website.