



मुख्य सीमाशुल्क आयुक्त कार्यालय, मुंबईअंचल-II  
**Office of the Chief Commissioner of Customs  
Mumbai Customs Zone-II**

जवाहरलाल नेहरू सीमाशुल्क भवन  
**JAWAHARLAL NEHRU CUSTOM HOUSE**

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Date:29-01-2026

**Record of Discussion of NAC-Chemicals with Industry  
Associations held on 14.01.2026**

A meeting of **NAC (Chemicals)** with Industry Associations was held on 14.01.2026 at **JNCH, Nhava Sheva**, under the chairmanship of the Convenor, NAC (Chemicals), the Chief Commissioner of Customs, Mumbai Customs Zone-II, JNCH.

2. Representatives from the MSME sector, leather industry and paper and pulp industry were also invited to the meeting. The list of attendees is placed at '**Annexure – A**'.

3. The agenda points sponsored by the stakeholders were taken up. A brief record of discussion, along with the actions need to be taken, is placed as '**Annexure - I**' (Old Agenda points), **Annexure -II** (New Agenda Points).

This issues with the approval of the Convenor, NAC Chemicals.

Digitally signed by  
Likhita Vijay Umare  
Date: 29-01-2026  
12:13:22  
(Likhita V Umare)

Dy. Commissioner, NAC(Chemicals)  
JNCH, Nhava Sheva

Encl: Annexure-I, Annexure-II, Annexure -A

Copy to:

1. Chief Commissioner's Office, Mumbai-II, JNCH.
2. All Members of Trade Interaction Meeting.
3. Office copy.

## **Annexure-A**

### **NAC Chemical Meeting with Industry Associations** **Held on 14.01.2026**

#### **List of Attendee**

The following officers of the department attended the meeting:

<b>S. No</b>	<b>Name</b>	<b>Designation</b>
1.	Shri. Yashodhan A. Wanage	Pr. Commissioner of Customs, Nhava Sheva-I
2.	Shri K Mahipal Chandra	Secretary (NAC) & Additional Commissioner of Customs, Mumbai Customs Zone-II
3.	Ms. Likhita V Umare	Dy. Commissioner of Customs, Mumbai Customs Zone-II

#### **Representatives from Industry associations:**

<b>S. No</b>	<b>Name (Shri/Ms./Smt.)</b>	<b>Association</b>
1.	Vincent Dmello	UPL Ltd.
2.	Rohit Sarna	All India Plastic Industries Association
3.	Jatin Jain	Federation of Indian Chambers of Commerce & Industry (FICCI)
4.	Anil K Goyal	Aarti Industries Ltd./FICCI
5.	Raju Kapoor	FMC Corp./FICCI
6.	Akshay V Murthy	Exxon Mobil/FICCI
7.	Ajay Saboo	Kajay Remedies Pvt. Ltd., Thane (Federation of Indian Micro and Small & Medium Enterprises (FISME))
8.	Prashant Patel	Prashant Industries, Surat (Federation of Indian Micro and Small & Medium Enterprises (FISME))
9.	Sahdev Warang	Indian Chemical Council (ICC)
10.	Rishabh Kaushik	Merck Life Science Private Limited (Indian Chemical Council)
11.	Shashank Mahana	
12.	Sanjay Kher	SME Chamber of India

13.	Harish Mehta	Crop Care Federation of India (CCFI)
14.	Sunil Kumar	J.K. Tyres
15.	Ramesh Kailasam	Corteva Agriscience Pvt. Ltd.
16.	A. Fayaz Ahmad	Council for leather exports
17.	Santosh Pandey	
18.	Arvind Mehta	All India Plastic Manufacturers Association

OLD AGENDA POINTS (ANNEXURE-I)					
Sr. No.	Agenda Point	Sponsoring Association	Trade Comments	Record of Discussion	Action Owner
1	<b>Chinese goods diverted through Thailand:</b> Rules of Origin to be verified by Customs Authorities as goods of Chinese origin are routed through Thailand under the ASEAN FTA. The referred goods are <u>Phenolic resins</u> under chapter 38 which are also coming under chapter 39.	Confederation of Indian Industry (CII)	No representative was present during the meeting.	In the previous meeting, the sponsoring association was asked to submit a detailed representation with available facts and figures to indicate the routing of goods through 3rd countries. No such representation has been received. Issue will be considered after it is received.	CII
2	<b>Resistance on the part of CFS to send containers of Hazardous goods for Scanning to CSD:</b> B/E filed in advance are RMS facilitated, but in the event of amendment in BL, it goes for examination. The material being hazardous in nature consignment cannot be opened, for examination. As per Public Notice issued in JNCH containers of hazardous in nature should go in for scanning but there is resistance from CFS to send the container for scanning so it is very difficult when order comes for 100% open and examination. Hence some facility should be made available to get rid of this as doing this entails additional costs.	UPL Ltd.		Once the Bill of Entry is amended, the examination instruction is triggered at ICES Level. Further, with respect to examination of representative sample, in such cases, an amendment in current Public Notice is under scrutiny by the Secretariat.	NAC Chemicals Secretariat.
3	<b>Exclusion of samples of Molecules imported in developmental stage from Licensing by CIBRC:</b> Samples of molecules come into India for renovation and upgradation. As these samples are in developmental stage they cannot be submitted for licensing. CIBRC had conveyed to them that they do not know the development stage of these molecules, hence they cannot issue import permit for this. CIBRC told them to discuss with customs and get their views on this.	Syngenta India Pvt. Ltd.	No representative was present during the meeting.	No discussion could take place in the meeting as nobody from the said industry was present for deliberations. Moreover, detailed submission as asked in previous meetings not received from sponsoring industry.	Closed
4	<b>Disparity in classification of Antioxidants 6PPD:</b> Some custom houses classify it under chapter 38, while some classify it under chapter 29.	J.K.Tyres	6PPD is being classified under chapter 38 as antioxidant of rubbers and also under chapter 29 as Other Aromatic Polyamines. BCD being same in both cases but CTH 29 covers ASEAN FTA.	The particulars of the concerned Customs Houses and importers where diverse practices were noticed were sought from J.K. Tyres.	JK Tyres

5	<b>Classification of certain chemicals under Ch 38 and Ch 29:</b> Generally, the Agrochemical products are classified under Chapter 38 and imports are subject to CIB registration. In the recent Budget 2025, many similar products of technical are also classified under chapter 29 for non-insecticidal usage. However, there is no such clarity either under customs or FTP provision that chapter 29 should be used only for imports of product for non-insecticidal usage and therefore, the same can be misused, due to duty differential. Further, all such items under Chapter 29 should also be made subject to CIB registration, as any item registered under Insecticide Act, requires registration for imports.	Pesticide Manufacturers and Formulators Association of India (PMFAI)	No representative was present during the meeting.	Some disparity is noticed in policy provisions which may be referred to the ministry. A substance, though listed in the Schedule to Insecticide Act, may get 'free' treatment in the ITC (HS). Further, same substance may get different policy treatment depending upon whether it gets classified under Chapter 29 or 38. The issue is currently under discussion.	NAC Chemicals Secretariat.
6	<b>CIB license under drop-down menu:</b> In case of Agrochemical, CIB issues import license product wise and source wise. So, all the license issued by CIB should be used by customs portal (ICEGATE) under drop down selection instead of putting the same under text column. This will check the imports of unregulated imports of Agrochemical from unauthorised sources.	Pesticide Manufacturers and Formulators Association of India (PMFAI)	No representative was present during the meeting.	Matter has been referred to JS(Customs), with recommendations.	Closed
7	<b>Mandatory testing of agrochemicals:</b> Imports of agrochemicals are increasing, through all ports by traders without proper testing. Surplus goods are coming in. There is no check especially w.r.t consignments from China and USA	CCFI	Four issues were raised : 1. Import from China and the USA: Large imports from China & USA continue at lower duties, while Indian exports face higher duties. Same duty on technicals and formulations discourages domestic manufacturing; a minimum 10% higher duty on formulations is sought. 2. Misuse of Rules of Origin (CAROTAR 2020): Agrochemicals are routed via Thailand/Singapore (non-manufacturing hubs) masking Chinese origin. 3. Registration of Technicals: Mandatory registration of technicals before formulation imports is needed to ensure quality and traceability. 4. Need for Specific Tariff Codes: Creation of detailed 8-digit tariff codes for agrochemical technicals and formulations is requested to enable proper classification.	1. A reference to TRU regarding the tariff issue is under examination. 2. Specific instances were sought from CCFI. 3. The issue should be taken up with line Ministry also by Sponsoring Association. 4. Creation of tariff lines is considered by Tariff Unit (CBIC) based on requests from the line Ministry, generally during the budget exercise.	CCFI and NAC Chemicals Secretariat.
8	<b>Regularisation of Advance License for shortfall in export obligation:</b> This can be done with payment of duties and IGST payment and credit issue. Department denying reassessment of BoE, only method to pay IGST and avail the credit. Need the clarifications.	PMFAI/Meghmani Dyes	No representative was present during the meeting.	Detailed representation has been received from the trade and the issue will be examined.	NAC Chemicals Secretariat.

<b>NEW AGENDA POINTS (ANNEXURE-II)</b>					
<b>Sr. No.</b>	<b>Agenda Point</b>	<b>Sponsoring Association</b>	<b>Trade Comments</b>	<b>Record of Discussion</b>	<b>Action</b>
1	<b>Classification of Formic Acid</b> : Formic Acid is regularly being classified under chapter 29 but some customs formations insist on classification under chapter 38 as it being 85 % solution.	Kajay Remedies Pvt. Ltd. (FISME)	Formic acid is normally imported and classified under Chapter 29, but some field formations propose classification under Chapter 38 because it is supplied as an 85% aqueous solution, which is its standard form	A written presentation with specific instances was sought from sponsoring association	Kajay Remedies Pvt. Ltd.
2	<b>Misdeclaration in Imports</b> : Final products are being imported by mis-labelling them as intermediates	FMC Corp (FICCI)	Imports are being done under incorrect descriptions, often involving sub-standard or unapproved material.	Specific instances with further details (e.g. name of goods in question, country of export, specific supplier if any etc.) were sought from Sponsoring Association	FMC Corp (FICCI)
3	<b>Classification of Formulation Imported from Malaysia</b> : The product is classified as fertilizer under Chapter 31 in Malaysia, but in India it will be used as a plantation formulation (rubber/coffee) and does not meet FCO nutrient criteria (N/P/K).	Kajay Remedies Pvt. Ltd. (FISME)	A formulation proposed to be imported from Malaysia is classified there under Chapter 31 (fertilisers). However, in India the same product is intended for use as a plantation input (e.g., rubber or coffee) and also it does not satisfy the nutrient composition requirements (N, P, K) prescribed under the Fertiliser Control Order (FCO) for Chapter 31.	Classification will be done as per the Indian Customs Tariff. In order to enable the NAC to deliberate on classification of the goods in question, more specific details of the goods were sought from Sponsoring Association.	Kajay Remedies Pvt. Ltd.