



Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

FFFAI/REP/100 /2020

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Shri.M. Ajith kumar
Chairman
Central Board of Indirect Taxes & Customs
North Block,
New Delhi – 110 001

Respected Sir,

Sub: Faceless Assessment

On behalf of trade and industry we convey our sincere appreciation to CBIC for rolling out faceless assessment under Turant Customs. This is one of the most progressive trust-based initiative rolled by CBIC in terms of TFA. We feel it is our responsibility to share our thoughts which are enumerated below:

1) **Time wise accountability for release of Bill of Entry -**

One of the major intentions of the Faceless assessment is timely clearance of Import Consignments. Hence it is suggested that there should be timelines for various activities including accountability on Customs also. When a Bill of Entry is submitted, verification of assessment of such B/Es in terms of Section 17 should be carried out within a specific time limit that could be benchmarked by the Department – illustratively it could be 2 – 3 hours by the concerned officer. If the said Bill of Entry is not released by the concerned officers on whose screen the Bill of Entry is appearing within this stipulated time, then it should throw an alert to the next level of officer. Also, in such an eventuality, the Bill of Entry should be released by facilitating the same under RMS.

Irrespective of the geographical location at which the Bill of Entry will be handled, time wise accountability for release will be the right step towards Ease of Doing Business.

2) **Faceless is not merely geographical displacement of assessments –**

The present format of faceless assessment, is only shifting the geographical location of the verification of assessments to be carried out. Whereas, faceless denotes that there should not be any pre-designated assessment groups to be assigned to any specific Commissionerates. It is also felt faceless should be a two-way process where neither the assesses nor the assessors should be visible to each other. If the assessment is for product of import, the relevance of importer is negligent.

3) **Monitoring of pendency level and queries in time bound manner –**

While uniformity in the Assessment practice is a welcome move, but for making the initiative of Faceless successful, it is imperative that each location the system-based monitoring of ICEGATE be kindly made available. This can monitor the group wise pendency level at each location, monitoring of queries and other relevant parameters. Time wise accountability for clearance of





consignment through system-based approach will help the trade and industry for timely clearance.

Auto escalation in case beyond stipulated hours 2 hours and facilitation under RMS thereafter will help to reduce not only dwelt time for clearance but progressively scale down assessment time. This should be applicable on assessment and out of charge of bill of entry. Appointing Nodal officer group-wise will also help for redressal.

4) **Online reply of Queries** –

Module for online replies for queries raised by Customs Officers needs to be operationalized properly. Importantly, officers will need to be sensitized to accept the queries replied online by Custom Brokers.

Any additional information sought by the officers, uploading of such information in E-Sanchit will help immensely.

Automatic waiver of late submission fees:

At present to get waiver of late submission fee in CBIC as per notification no.36/2018 (NT) needs to be carried out on manual basis. We kindly request that for reason which are beyond the control of importer like downtime in EDI system in such cases auto waiver feature in the Customs EDI System will be of great help.

Further for getting waiver for late submission fee, online mechanism to deal with such issues will surely help to create paperless environment under faceless.

5) **Online release by PGA's under Single Window and by Custodian**–

Release of documents by PGA under Single Window will play an important role in timely clearance of consignments. Most of the PGA's are still not online. Even PGA's such as ADC which are online, they are still seeking parallel manual processes for release. Trade and industry have been addressing these issues for past several years.

As on today, most of the PGA's are having manual processes, in addition to online release process. In fact for PGA's such as FSSAI, AQ, PQ etc., the online module is still not working properly and manual permissions have still to be taken.

All the custodian across the country should be integrated under ICEGATE in order to ensure that submission of hard copy of documents is dispensed with it.

With introduction of faceless, release of such documents under Single Window by PGA's will urgently need to be streamlined. For example: A document filed at Mumbai, a Custom Broker / Importer should not be made to approach the PGA for NOC / Release at a different geographical location where the Bill of Entry may have been diverted for Assessment. A proper



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time wise accountability for release of such documents by PGA's online needs to be implemented.

We look forward for your kind consideration towards the points enumerated above.

FFFAI assures full support to CBIC for making faceless assessment successful and we will provide timely feedback to CBIC for effective implementation and its positive impact to trade and industry.

Thanking you,

Yours truly,

For Federation of Freight Forwarders' Associations in India

A.V. Vijayakumar
Chairman

