



FFFAI/LETTER/135/2020

22.10.2020

Mr. Sandeep Bhatnagar  
Member (Customs)  
Central Board of Indirect Taxes & Customs  
North Block,  
New Delhi – 110 001

Respected Sir,

We place on record our sincere thanks for interacting with FFFAI Members to resolve the issue faced by trade and industry. We pledge our full support to CBIC for improving dwell time in clearance of import consignments in order to improve the index of Ease of Doing Business.

We enumerate below points received from various location across the country along with suggestion regarding Faceless Assessment.

1. There is considerable delay for clearance of consignments at ports and airport.

**Suggestion:**

- a) To overcome the delays in the assessment front, there could be a stipulated time for processing Bills of entry by a FAG Officers,
- b) In the event of delay beyond the prescribed limit, AC/ DC should be enabled to re-route such Bills of Entry to another FAG officer,
- c) Better still would be for NAC to monitor delays and re-route declarations to any of the other FAG locations / Officers,
- d) Though tough, if other requirements are satisfied, delayed Bill of Entry can enjoy RMS facilitation.

2. Even Senior Officers are unable to convince the FAG -Faceless Assessment Group for timely clearance.

**Suggestion:** There is an urgent need to depute Nodal Officer at each PAG/FAG locations, with email ID and cell number to address the difficulties faced by trade. This needs to be uploaded on CBIC website.

3. Unwanted queries, repeated queries, First Check orders examination order, etc., is delaying the clearances. Even after query reply it some takes 4-5 days for Bill of Entry to be completed.

**Suggestion:** There is need to check number of queries, avoidance of piecemeal query & time-wise requirement of completion of Bill of Entries immediate after query reply.





4. Recalling / Reassessment of Bill of Entry is causing considerable delay since the files are marked up to Commissioner Level for permission.

**Suggestion:** For any reassessment to be carried out the same may kindly be carried out by PAG at the level of Deputy Commissioner instead of the present situation where the files are sent up to Commissioner level for reassessment.

5. Carrying out amendments in Bill of Entry is again very time consuming and files are sent to Commissioners level for approval at various locations.

**Suggestion:** We request that normal amendments should be carried out at PAG with Deputy Commissioner.

6. Some assessments are being made with examination instructions entered in the special comments box which CB and Trade is not aware. Hence during examination after payment of duty there are surprise checks which the trade needs to respond. It is also experienced that after completion of assessment after first check, when the Custom Brokers approaches for final out of charge there are special instruction given in comment box.

**Suggestion:** For sake of transparency and timely clearances instruction need to be given on body of Bill of Entry with examination order. Once the assessment is completed after examination, no comments should be given in the special comment box.

7. Considerable delay is faced in examination due to unwanted comments and requirement being asked. Order for 100% examination should not be insisted as being frequently done at present.

8. Reference para 2.5 of CBIC circular 45/2020 which stipulates that Custom Brokers needs to approach FAG for carrying out reassessment needs to be relooked.

**Suggestions:** importer/Custom Brokers do not have accessibility to FAGs. Hence for reassessment the proper officer in PAG will need to approach by trade for carrying of reassessment.

9. Delay in clearance of consignments EPCG, Advance Authorization, project import and provisional assessment cases due to 100% BG being levied, even in cases where not applicable. To remove the 100% BG there is confusion between PAG and FAG, as regards who will remove the 100% BG. It takes minimum 3-4 days to rectify.





[ESTD. 1962]

# Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

10. We request that CBIC circular with FAQ be kindly issued to trade and industry as this will comprehensively clear doubt of Officers and trade as well.

11. Most importantly there is urgent requirement to create a Faceless corner on CBIC website, where the trade can escalate the cases of delay in clearance. Centralised monitoring mechanism to trade will be highly beneficial to make Faceless successful.

12. Examination orders are also given for opening of EOU consignment

**Suggestion:** In terms of para 6.40 (b) of H.B.P 2020. As per the said para 100 % EOU status holders units shall be exempted from examination of import cargo at port of import. However Jurisdiction Commissioner of Customs may examine consignment at unit's place on random basis.

Thanking you,

Yours truly,

For Federation of Freight Forwarders' Associations in India

**Sd/-**

A.V.Vijayakumar

Chairman

