



Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

FFFAI/MINUTES/286/2020

21.09.2020

Minutes of the 5th Online Executive Committee Meeting held on 25.07.2020

A) Members Present

S.No	Office Bearers	Representing Association	Attendance
1	Mr. A.V. Vijayakumar - Chairman	Chennai CHA Association	05/05
2	Mr. Shankar Shinde - Chairman - Elect	Nashik CHA Association	05/05
3	Mr. P.S.Atrey - Vice Chairman	Delhi Custom Brokers' Association	05/05
4	Mr. Rajesh Verma - Vice Chairman	Ludhiana CHA Association	03/05
5	Mr. Vinod Sharma - Vice Chairman	Pune CHA Association	05/05
6	Mr. Sudip Dey - Vice Chairman	Calcutta CHA Association	03/05
7	Mr. Alan Jose - Vice Chairman	Cochin CHA Association	05/05
8	Mr. Mandava Satyanarayana - Vice Chairman	Kakinada Customs Brokers Assn	05/05
9	Mr. Dushyant Mulani-Honorary Secretary	Brihanmumbai CB Association	05/05
10	Mr. Sudhir Agarwal - Honorary Treasurer	Nagpur CHA Association	04/05
11	Mr. S. Ramakrishna - Imm.Past Chairman	FFFAI	05/05
	Executive Committee Members	Representing Association	Attendance
12	Mr. Kartik A. Pancholi	Ahmedabad CHA Association	03/05
13	Mr. Devendra Thakker	Ahmedabad CHA Association	02/05
14	Mr. Sarfaraz Khan	Aurangabad CHA Association	05/05
15	Mrs. Philomena Pereira	Aurangabad CHA Association	02/05
16	Mr. B.N.Rajmoghon	Association of CHA -Thiruvananthapuram	05/05
17	Mr. Suresh Kumar	Association of CHA -Thiruvananthapuram	05/05
18	Mr. S. Nanda Prakash	Bangalore CHA Association Ltd	05/05
19	Mr. Karunakar Shetty	Brihanmumbai CB Association	04/05
20	Mr. Kiran Rambhia	Brihanmumbai CB Association	04/05
21	Mr. Paresh Thakkar	Brihanmumbai CB Association	03/05
22	Mr. Hiren Ruparel	Brihanmumbai CB Association	02/05
23	Mr. Subhash Chandra Ghosh	Calcutta CHA Association	02/05
24	Mr. Mannu Choudhary	Calcutta CHA Association	02/05
25	Mr. S.Nataraja	Chennai CHA Association	04/05
26	Mr. R.N. Sekar	Chennai CHA Association	03/05
27	Mr. R. Kumar	Chennai CHA Association	05/05
28	Mr. Vishal Dadha	Chennai CHA Association	04/05
29	Mr. V. S. Pradeep	Cochin CHA Association	02/05
30	Mr. R. Rajesh Kumar	Coimbatore CH & SA Association	03/05
31	Mr. Dileep T. Abraham	Coimbatore CH & SA Association	03/05

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Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

[ESTD. 1962]

32	Mr. Adil Khan	CHA Association Hyderabad	05/05
33	Mr. P.S.Rajkumar	CHA Association Hyderabad	03/05
34	Mr. Puneet Jain	Delhi CB Association	04/05
35	Mr. Harjit Singh	Delhi CB Association	04/05
36	Mr. Vaneet Aggarwal	Delhi CB Association	03/05
37	Mr. Amit Kamat	Goa CB Association	03/05
38	Mr. J. A. Dsouza	Goa CB Association	03/05
39	Mr. Hemchandra B Yadav	Kandla CB Association	03/05
40	Mr. Dhiren Chhaya	Kandla CB Association	04/05
41	Mr. Ramesh Bansal	Kandla CB Association	05/05
42	Mr. Amit Khanna	Kanpur Customs Brokers Association	03/05
43	Mr. Philip C C	Mangalore CHA Association	03/05
44	Mr. Manoj Kotak	Mundra CB Association	02/05
45	Mr. Pramod Soneta	Mundra CB Association	03/05
46	Mr. T.V.Sujan	Mundra CB Association	04/05
47	Mr. A. Prasad	Nagpur CHA Association	03/05
48	Mr. Kiran D. Nagare	Nashik CHA Association	05/05
49	Mr. R. K. Mehrothra	Noida Custom Brokers Association	04/05
50	Mr. Vipin Vohra	Noida Custom Brokers Association	04/05
51	Mr. Rajdeepak Bharagava	Pune CHA Association	03/05
52	Mr. S. Sasikumar	Tuticorin Customs Broker's Assn	03/05
53	Mr. J.Pinto Villavarayar	Tuticorin Customs Broker's Assn	04/05
54	Mr. K. V. Krishna Kumar	Visakhapatnam Association	01/05
55	Mr. G.Rajesh	Visakhapatnam Association	01/05
56	Mr. Shankar Prasad Verma	West Bengal CHA Society	02/05
57	Mr. Sujit Chakraborty	West Bengal CHA Society	03/05
	Nominee of Associate Members	Port	Attendance
58	Mr. C.S. Nagendra Prasad	Bangalore	05/05
59	Mr. Chandrachari B.R.	Bangalore	03/05
60	Mr. Girish N	Bangalore	03/05
61	Mr. Shashidhar V.Hebbar	Bangalore	03/05
62	Mr. Balu S Govindrajan	Chennai	02/05
63	Mr. M.A.Zahir Hussan	Chennai	02/05
64	Mr. R. Radhakrishnan	Chennai	03/05
65	Mr. T.V.Gopu	Chennai	02/05
66	Mr. Nirav C. Thakker	Mumbai	05/05
67	Mr. Ganpat P.Korade	Mumbai	04/05
68	Mr.Tej Mayur Contractor	Mumbai	04/05
69	Mr. Maruti R.Gadge	Mumbai	03/05

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Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

[ESTD. 1962]

70	Mr. S.B.Salian	Mumbai	01/05
71	Mr. Palvinder Singh	New Delhi	03/05
72	Capt. Ashish Samarth	Pune	03/05
73	Mr. A.S.Ramasamy	Tuticorin	04/05
74	Mr. J.Manikandan	Tuticorin	05/05
75	Mr. C.Karthikeya Prabu	Tuticorin	04/05
76	Mr. L. Cecil Machado	Tuticorin	03/05
77	Mr. P.Jeyanth Thomas	Tuticorin	04/05
	Advisors	Representing Association	Attendance
78	Mr. Mark S Fernandes	FFFAI	01/05
79	Mr. Samir J Shah	FFFAI	04/05
	INVITEES	Port	
80	Capt. Piyush Sinha	Aurangabad	
81	Mr. M.J.Rai	Mumbai	
82	Mr. Dinesh Gupta	Mundra	
83	Mr. Aleemuddin	Chennai	
84	Mr. Babu Rao Polina	Visakhapatnam	
B)	Member Not Present -Request for leave of absence received		
	Executive Committee Members	Representing Association	Attendance
1	Mr. Pradeep Kale	Pune CHA Association	02/05
C)	Member Not Present -Request for leave of absence Not received		
S.No	Executive Committee Members	Representing Association	Attendance
1	Mr. Devang Joshi	Ahmedabad CHA Association	03/05
2	Mr. Belli Gowda	Bangalore CHA Association Ltd	03/05
3	Mr. K.N.Shivanna	Bangalore CHA Association Ltd	02/05
4	Mr. Vinayak Aparaj	Brihanmumbai CB Association	02/05
5	Mr. S. Balaji	Chennai CHA Association	03/05
6	Mr. Suraj Muraleedharan	Cochin CHA Association	04/05
7	Mr. G. A. Kalyanan Moorthy	Coimbatore CH & SA Association	01/05
8	Mr. T. Abhimanyu	CHA Association Hyderabad	03/05
9	Mr. Bhim Singh Jain	Delhi CB Association	02/05
10	Mr. Jogesh Sethi	Delhi CB Association	03/05
11	Mr. Anurag Vijayvargiya	Indore CHA Association	02/05
12	Mr. Amit Kumar Jain	Indore CHA Association	02/05
13	Mr. Sreeram Bhagawathi	Kakinada Customs Broker's Assn	03/05
14	Mr. Sandip Mishra	Kanpur Customs Brokers Association	00/05





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

[ESTD. 1962]

15	Mr. Narinder M. Prabhakar	Ludhiana CHA Association	00/05
16	Mr. Gurpreet Singh Bains	Ludhiana CHA Association	01/05
17	Mr. Shareef M	Mangalore CHA Association	01/05
18	Mr. Pankaj Lodaya	Pipavav Customs Broker's Assn	03/05
19	Mr. Chirag Shah	Pipavav Customs Broker's Assn	02/05
20	Mr. Arun Sharma	Rajasthan CHA Association	00/05
21	Mr. Jagvir Singh	Rajasthan CHA Association	01/05
22	Mr. Sunil Sharma	Rajasthan CHA Association	01/05
23	Mr. R. Sreedhar	Tuticorin Customs Broker's Assn	03/05
24	Mr. P. V. Jagannath	Visakhapatnam Association	00/05
25	Mr. Swapan Chakraborty	West Bengal CHA Society	00/05
	Nominee of Associate Members	Port	Attendance
26	Mr. R. Lakshimipathy	Chennai	02/05
27	Mr. V.R.R. Bhagawathi	Kakinada	02/05
28	Mr. Omprakash Agrawal	Mumbai	01/05
29	Mr. Sohel Kazani	Mumbai	02/05
30	Mr. V.Arjun Sankar	Tuticorin	00/05
31	Mr. M.V.Vijay Raghavan	Tuticorin	00/05

**Agenda no.1: Meeting call to order by Hon Secretary.
Welcome Address by Chairman –FFFAI**

Honorary Secretary – Mr. Dushyant Mulani welcomed the Executive Committee Members for the 5th online Executive Committee Meeting.

He requested Chairman to conduct the proceedings.

Mr. A.V.Vijayakumar read out the Anti-Trust statement to the house. **(Annexure A)**

Mr. A. V. Vijayakumar extended warm welcome to the Executive Committee Members for 5th online Executive Committee Meeting. He stated that due to lockdown extended across the country it was not possible to have Executive Committee Meeting, hence FFFAI decided to conduct online meeting.

Agenda no.2: To note and grant leave of absence to all who have intimated

Mr. Dushyant Mulani informed that we have received leave of absence from Executive Committee Members and if the house approves leave of absence can be granted.

The house granted leave of absence to the members who had sought.





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

[ESTD. 1962]

Agenda no.3: To confirm the minutes of the 4th Executive Committee Meeting held on 9th May, 2020 for the term 2019-2021. (Already sent by e-mail to members)

Mr. Dushyant Mulani stated that minutes of the 4th Executive Committee Meeting held online on 9th May, 2020 were circulated in advance. He inquired with the house, if there were any observation.

As there were no observations the minutes of the 4th Executive Committee Meeting held online was unanimously approved by the house.

Agenda no.4: To report and discuss action arising out of the minutes of 4th Executive Committee Meeting on 9th May, 2020 (2019-21)

Mr. Dushyant Mulani read out the action arising out of the minutes of the 4th Executive Committee Meeting held on 09th May, 2020. He stated that all the action are completed except one wherein FFFAI has requested members to provide details about marking bill of entries of unrelated items to PGAs. He added that we have received communication only from Mr. Anurag Vijayavargiya. He requested members to kindly provide the details to FFFAI.

Agenda no.5: To report on activities done

Agenda no.5a: Reports already sent by e-mail – open for brief comments if any:

Mr. A. V. Vijayakumar stated that during the lock down period FFFAI conducted several online webinars for the benefits of members. He read out the events/ webinar conducted. **(Annexure B)**

Mr. Dushyant Mulani stated that FFFAI has been forefront in representing the issue with CBIC and other Ministries. Most importantly representation done by FFFAI, some of them even prior to lockdown have now been translated into CBIC circulars such as paperless working, online availability of OOC, LEO print out, online DO, simplification of bond process, good registration, etc.

Agenda no.6: Open brief discussions on:

Agenda no.6a: Customs Matters/ CBLR

Mr. A. V. Vijayakumar stated the minutes of the 12th CCG Meeting were circulated to all Executive Committee Members of FFFAI. The points sponsored by FFFAI were considered favourably by the Chairman of DGEP.

Mr. S. Nataraja stated that after implementation of faceless, within one week the problem have started due to which there is delay in clearance. There is considerably increase in first check examination being given by Officers and has resulted unwanted queries. He further stated that issue was taken up in the PTFC meeting and Commissioner appointed Nodal Officer to keep check on the first check and queries being given.

Mr. A. V. Vijayakumar said FFFAI has made representation on Faceless Assessment wherein all the points are covered.

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Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

Mr. Dushyant Mulani stated that we have interacted with CBIC Chairman and have provided him the following points on Faceless Assessment.

- 1) Time wise accountability for release of Bill of Entry
- 2) Faceless is not merely geographical displacement of assessments
- 3) Monitoring of pendency level and queries in time bound manner
- 4) Online reply of Queries
- 5) Automatic waiver of late submission fees:
- 6) Online release by PGA's under Single Window and by Custodian

Mr. Devendra Thakker stated he has been observing since 2007 that whenever new procedure is implemented by CBIC and when updated on the ICEGATE system the trade faces lot of issues like print out not coming, error while filing IGM, Shipping Bills etc. He opined that issue should be addressed to CBIC stating that implementation on the ICEGATE should be done at specific time which should be informed to the trade so that nobody files the documents on the ICEGATE system.

Mr. B. N. Rajmoghon stated that at Trivandrum due to COVID the general cargo is kept aside for 3-4 days after which the examination is done. He suggested that general cargo should be examined upon the arrival.

Mr. A. V Vijayakumar stated that it is the local issue hence should be taken up with local Chief Commissioner.

Mr. S. Ramakrishna stated that ADC code copy is the system problem which is looked into by the DG System. He stated that with regard to transparency copy, the custodians have the gate details but the details are required by shipping companies for EGM which are not available in the system. Hence DG System is working on the same.

Mr. P. S. Rajkumar stated that whenever there is down time in ICEAGATE System, then the waiver for late fee charges should be given automatically by the ICEGATE system. He also suggested that issue should be taken up with DG System.

Mr. A. V. Vijayakumar stated that FFFAI has made representation to Chairman – CBIC that if there is system failure for six hours auto waiver should be granted by DG System. Chairman responded saying that blanket permission cannot be given as it requires to verify the system error before granting the waiver.

Mr. Girish Narayan informed that after implementation of faceless assessment at Bangalore, there are lot of queries being raised by the Officers.

Mr. A. V. Vijayakumar stated that problem faced regarding faceless assessment should be forwarded to FFFAI for taking up the issue with Chairman – CBIC.

Mr. Mannu Chaudhary said that shipping lines are filing the EGM back dated due to which IRN number needs to be generated for which it is required to go the service centre. He query that what will be future of Custom Brokers after implementation of SCMTR.





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

[ESTD. 1962]

Mr. Dushyant Mulani stated that in case of air cargo inward back dated entry in system is levy to penalty, interest and demurrage. He requested members to forward the issue faced at their location to FFFAI to enable us to take up the issue.

Mr. Alan Jose stated that in the faceless assessment we should submit all the documents along with bill of entry under e-sanchit to minimise the query raised by the officers.

Mr. S. Ramakrishna stated that there is some error in the system as appraising Officers are not able to view the documents. After the assessment and payment of duty the document does not goes to the officer screen. The DG System is working on the same to rectify the error.

Mr. R. N. Sekar said in faceless assessment most of the bill of entries are being sent for first check. He opined that documents should be assessed by both the group of Officer and first check should be removed from the faceless assessment as members are facing lot of issues.

Mr. Amit Kamat said at Goa, system generates the order for full examination of the consignment but due to non-availability of forklift at Goa the examination of consignment is done next day. He further added that they are also facing difficulties at Goa regarding examination for factory seal export container of perishable goods and pharma products, etc., which are sterile in nature. According to him this should not be opened at the time of examination as this can cause contamination to the export products if the container is opened.

Mr. Dushyant Mulani responded that there is circular no.13/2018 issued by CBIC which is very clear. He read out the para of the circular and stated that we should make use of this circular issued by the Board.

“The matter has been examined in the Board. The shift from erstwhile supervised factory stuffing to self-sealing was to facilitate easy movement of export containers and to secure against tampering enroute by use of one-time e-seals. As all Ports/ICDs may not have sterile, temperature controlled examination facilities, therefore, selection of reefer containers for examination might lead to contamination or spoilage. In order to address these issues, Board has decided to allow factory stuffing and sealing of reefer containers with perishable/ temperature sensitive export goods in the presence of Customs officials. “

Mr. Dushyant Mulani stated that this circular from CBIC should help to resolve the issue.

Mr. Rajesh Verma stated that for LCL imports at ICD the consolidators first bring LCL shipments to Nhava Sheva at dedicated CFS and thereafter rework the containers for ICD locations. Similarly for export shipments as well they first console the LCL cargo at ICD location and bring that cargo to Nhava Sheva at same dedicated CFS. Now, what they are doing is that since they are to take export shipment to Nhava Sheva CFS and bring back the import shipments from Nhava Sheva CFS to ICD location, they are using their own containers. Therefore the containers have repeated inward entry at ICD location for import.

Once this container takes export cargo to Nhava Sheva and till that time the same container comes back, previous import inward entry in EDI system remains. Therefore when we file Bill of entry, for new imports where LCL shipment is coming in same container, the EDI system calculates late submission penalty based on previous entry date 2-3 days are then spent on waiver of the same.





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

He requested that there may be provision in EDI when all BEs are filed against all LCL import shipments, entry inward of that particular container number be deleted.

Mr. A. S. Ramasamy informed that after implementation of e-shipping bill, e-gate pass, e-LEO the Customs are still insisting for print out of e-gate pass, e-LEO.

Mr. A. V. Vijayakumar replied that there is circular from the Board for e-gate pass, e-LEO but at some locations Customs is still insisting to get the signature of preventive officer though as per the Board circular it is not required. He suggested taking up the issue with the local Commissionerate.

Mr. Alan Jose stated e-gate pass is routed through CFS which is causing additional cost. He suggested that provision should be available at the gate wherein Preventive Officer can carrying out the scanning without extra charges.

Agenda no.6b: **GST/ Service Tax Matters**

Mr. Alan Jose informed that GST audit needs to be completed by September, 2020 as it is required to file the GSTR 9 latest by September, 2020. He suggested to make representation to the Finance Ministry to extend the date of filing the GSTR 9.

Agenda no.6c: **Port related Issues**

Agenda no.6d: **Sea Freight related issues**

Mr. Shankar Shinde informed that Director General of Shipping had called meeting to discuss about transparency in transaction cost. During the meeting Director General of Shipping formed a sub-committee to discuss about the transparency in transaction cost and submit the report to Director General of Shipping. The committee was headed by CSLA, though it was challenging as they had hidden agenda cost. At the sub-committee meetings we had objected on various points but CSLA had prepared the report and submitted to Director General of Shipping which was strongly protested by FFFAI, FFFAI submitted the separate report to the Director General of Shipping.

Mr. Rajesh Verma stated that carrier are charging very exorbitant charges for the exchange rate hence it should be taken up.

Mr. Shankar Shinde stated that this issue was raised by FIEO during the meeting with State Bank of India. FFFAI had agreed for the minutes of the meeting but did not agree for the cost.

Mr. Karunakar Shetty stated that shipping companies are not registered on PCS whereas Custom Brokers are registered under PCS. He requested that we need to address the issue with Ministry of Shipping.

Mr. Shankar Shinde said there is parallel procedure i.e. manual as well as PCS.

Mr. Dushyant Mulani stated that FFFAI had made representation to Member (Customs) to reduce the bank guarantee/bond to Rs. 1 lakh and moratorium period of three months to be given for all those who acts as Agent or Principal for Overseas and unregistered forwarder for registering with DG Systems. He added that we have received the reply from the office of the Directorate General of Systems and Data





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

[ESTD. 1962]

Management, CBIC that our request to reduce the bank guarantee/ bond to Rs. 1 lakh and moratorium period of three months to be given for all those who acts as Agent or Principal for Overseas and unregistered forwarder for registering with DG Systems is under consideration by the Board.

Mr. Alan Jose stated that after implementation of SCMTR the Custom Brokers should not be charged extra which need to be addressed.

Mr. A. V.Vijayakumar stated that we have communication from CBIC that less number of stakeholder have register under SCMTR. He requested members to inform their clients to register under SCMTR.

Mr. Samir J. Shah said he would like to ask few question to the members and each member has to reply yes or no. He queried to the members will the Indian Licensed Custom Broker survive the facilitation & changes?

All the members answered yes. The detailed PPT prepared by Mr. Samir J. Shah is enclosed (**Annexure C**)

Agenda no.6e: **Airport and Airfreight related Issues**

Mr. Vipin Vohra stated that he attended one or two meeting but there is nothing to report at this time.

Mr. Dushyant Mulani stated that private airport terminal operators have got the habit of sending communication to AERA to increase the charges every year. The stakeholders meeting is conducted by AERA for discussing the charges to be increase by airport terminal operators. He suggested that issue should be represented to Ministry of Civil Aviation that charges should not be increased annual by this custodians.

Mr. Vipin Vohra further stated that concept of AFS has been jeopardised across the country by private air cargo terminal operators.

Mr. Dushyant Mulani stated that AERA should not insist on annual rate increase without increase in infrastructure, manpower, equipment and performance standards.

Mr. Vipin Vohra said he is preparing presentation regarding charges being charged by the airport terminal operators for last few years. He informed that if all the location can forward the circular of charges being charged by their custodian for last eight to ten years we can make strong representation for submitting to Ministry of Civil Aviation and also to Ministry of Finance.

Mr. A. V.Vijayakumar stated that there are four major airports coming under AERA. He added that we should take the strong support from the users also. Further AERA is planning for 24 hours free period instead of 48 hours at present which will create lot of problems for the members.

Mr. .P. S. Atree stated that at Delhi we have objected for the charges but it was not minuted by AERA hence we had made representation after collecting the details of charges being charged at other locations but till date AERA has not responded to our representation.





Mr. A. V. Vijayakumar stated that AERA is regulatory authority hence support of actual user is required so that it can be strongly taken up with Ministry of Civil Aviation.

Agenda no.6f: ICD related issues

Mr. Devendra Thakker stated that CONCOR charges documentation charges, data charges and surveyor charges per TEU, even everything was done earlier also cumulative under one charge and now charging under different heads additionally. He further stated that during the COVID lockdown period CONCOR had come out with Circular that the empty container movement by rail free of cost due to which less containers are available in CONCOR locations of ICDs. He added that Government of India is working towards decrease in logistics cost but CONCOR is increasing the charges directly or indirectly.

He continued saying that we are getting the print out of the shipping bills, gate pass at office and CMC/contractors charging for same even though no role is done by them. We are unable to get the print out of the transference copies as per CBIC Circular which were to be forwarded to shipping lines in seal cover. The costs are increasing due to the same for Custom Broker as many are asking for seal cover and shipping bill copies which are printed within the office of Custom Broker.

Mr Rajesh Verma endorsed saying that not only CONCOR even private ICDs have followed the same process by including in their charges but they are charging selectively to the trade. He said there is no transparency in charges being charged by private ICDs.

Mr. Kartik Pancholi stated that we have never hear CII, FIEO, FICCI discussing the charges of custom brokers then why are we discussing the charges being levied to our customers. We should plan our charges to be charged. He agreed that there is issue of revenue as the same is being invested by Custom Brokers.

Mr. A. V. Vijayakumar said that DG Shipping and CBIC have issued circular for waiver of detention and demurrage charges but the shipping lines, custodians and CFSs are not adhering to the circulars issued by DG Shipping and CBIC and are charging exorbitant charges to the trade during the COVID period. He further stated that whatever representation has been done by FFFAI we were able to get favourable order from DG Shipping and CBIC.

Mr. Rajesh Verma informed that before COVID – 19 Custom Brokers were handing over the documents to Shipping lines. He further stated that FFFAI had made representation to the Board to dispense the TR1 and TR2 copy which was met vide CBIC circular no.30/2020 issued with specific note. However the endeavor of CBIC to dispense with TR1 and TR2 is defeated since shipping lines have started appointing third party vendors who are forcing the Custom Brokers to fill the data on MMD3 platform at the time of acceptance of export consignment at various ICDs across the country.

The meeting was organized with Master Marine to discuss the following issues.

- Till now the CBs were providing the SB TR1 & TR2 hard copies to Master Marine Office and all information was fed by Master Marine office being surveyors of the carrier. MMD3 is just being used to outsource Master Marine work through CBs at their cost and time.





[ESTD. 1962]

Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

- CBIC has now stopped printing of TR copies of Shipping Bills vide Customs Circular 30/2020 in endeavour to facilitate ease of doing business in customs clearance, and CBs/Exporters get the copies of SB in PDF files which can be easily sent to Master Marine office.
- Whole process of uploading SBs on MMD3 is very time consuming and take about min. of 50 minutes to fill entry of one SB.
- All required information is already available in SB PDF copy and ICEGATE.
- Uploading of SBs is mere duplication of work and re-feeding of whole data. It was therefore suggested that carriers must take up the matter with ICEGATE/CBIC to get the required information for manifest purpose and avoid this cumbersome process.
- We have serious concern on safety and security of sensitive trade information as well.

Master Marine informed that there is no force to use the MMD3 program. The Master Marine had offered the trade digital solution so as to ensure an error free flow of data which is cost effective and beneficial to all the stakeholders. The trade can carry out the manual process also.

Mr. A. V. Vijayakumar stated that we have made representation and hope we will get favourable reply.

Agenda no.6g: **Association Matters**

Mr. A. V. Vijayakumar informed that we have received communication from Visakhapatnam Association stating that name of the association has been changed from Visakahapatnam Customs Clearing Agents Association to Visakhapatnam Custom House Agents Association. Visakhapatnam Custom House Agents Association has also provided the names of new nominee for the Executive Committee for the term 2019-2021. He said if the house agrees we can accept the name change and new nomination received from Visakhapatnam Custom House Agents Association.

The house unanimously accepted the name change of the association from Visakhapatnam Customs Clearing Agents Association to Visakhapatnam Custom House Agents Association. The house also accepted the new nomination received from Visakhapatnam Custom House Agents Association.

Agenda no.7: **To discuss amendments required in CBLR 2018**

Mr. A. V. Viayayakumar stated issue will be discussed in CBLR meeting and will address thereafter. The amendment in CBLR 2018 sub-committee is headed by Mr. S. Ramakrishna and the sub-committee will compile the suggestions received from members to make appropriate representation for forwarding to the Board.

Mr. Amit Kamat stated that CBLR 2018 stipulates that change in partnership deed is considered as new license due to which security deposit is enhanced. He opined that if there is change in the Constitution of the company due to demise of one of the partner and no new name has been added in the partnership than it should be considered as old license and should not be treated as new license and no security deposit should be enhanced. He stated that issue should be address to the Board.

Agenda no.8: **To discuss Indian Institute of Freight Forwarders matters: (IIFF)**

Mr. Tej Contractor stated that IIFF will be imparting two types of education.





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

[ESTD. 1962]

- i) Edu-log webinar – which is free for all members
- ii) IIFF-FIATA Diploma in freight forwarding

He further stated that IIFF intends to start the IIFF-FIATA Diploma in freight forwarding course online on the virtual platform so that the students who are enrolling for classroom as well as distance can enrol for the same. He further added that IIFF has announced Independence Day offer of 50% whereby students who are enrolling for the course upto 15th August, 2020 will have to pay Rs.17500/- + GST. He requested that Presidents of Member Association to support IIFF by giving wide publicity for the course. The 50% discount circular has been forwarded to FFFAI for circulating.

Agenda no.9: To approve applications received from Associate and Allied membership of FFFAI

Mr. Dushyant Mulani stated that we have one application for Associate membership and one Allied membership of FFFAI. He requested members to approve the same.

The house unanimously approved all the applications received for the membership of FFFAI.

LIST OF NEW ASSOCIATE MEMBERS - 5th E.C. Meeting

Sr No	Name of Members	Applied From	Enclosure	Attested by
1	Sanmuga Transport Private Limited	Chennai	CHA License	Chennai Assn

LIST OF NEW ALLIED MEMBERS - 5th E.C. Meeting

Sr No	Name of Members	Applied From	Enclosure	Attested by
1	Western Carriers (India) Ltd	Kolkata	MTO License	Calcutta Assn

Agenda no.10: To announce date and venue of next EC Meeting and AGM

Mr. A.V. Vijayakumar said looking at the current scenario we will have to conduct the online meeting. If the situation improves we may decide to have the Executive Committee Meeting and AGM. He stated that we will discuss and let the member know about the next Executive Committee Meeting and AGM dates. He added that we have checked with Advocate and according to him AGM can be extended upto 31st March, 2021.

Agenda no.11: Any other matter with the permission of the Chair

Mr. Sudhir Agarwal informed that in the last AGM auditors were not appointed and house had authorised current Chairman and Honorary Treasurer to appoint the auditors. The issue was discussed amongst Office Bearers and decided to appoint M/s. B.M.Mehta & Co., as our auditors for 2019-2020. Spoke with Mr. Ashit Mehta of M/s. B.M. Mehta & Co., and he has agreed to do our audit for the financial year 2019-2020. The remuneration decided is Rs. 60,000/- for the audit fees.





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

The house unanimously agreed to appoint M/s. B. M.Mehta & Co., as auditor for the financial year 2019-2020.

He further updated the house that after sending the invoice we have received membership fees of around 300 members and 6 ordinary members which is not covering even 20% of the projected amount. He requested Presidents of Member Associations to speak with their members to pay FFFAI subscription immediately. The outstanding list of members will be forwarded to each President by FFFAI Secretariat and we request the support of Presidents to collect the dues of FFFAI.

Mr. Rajesh Verma informed that FFFAI has circulated communication along with format to Executive Committee Members to provide the different practices being followed by different Commissionerate at various locations. After received the feedback from the members FFFAI will make appropriate representation to CBIC and other stakeholders for adopting process which will help to achieve uniformity, transparency and to create paperless environment.

Mr. Hiren Ruparel stated with regard to certificate of origin there is PN issued by Nhava Sheva. He further stated that with regard to China origin consignment there is an issue of signature. He suggested that signature verification needs to be sorted out which will be great move.

Mr. Shankar Shinde informed that FFFAI has circulated circular stating that Government e-Marketplace (GeM) is the first time an opportunity for International LSP to offer services through GeM. Kindly note that Government of India has also added our CB(customs Broker) services to the GeM Portal which will benefit our industry at large as MSE would now be participate in the subject online tender. He further informed members take advantage of the same and bid for the tender.

Vote of Thanks

Mr. Dushyant Mulani thanked Mr. A.V. Vijayakumar for chairing the meeting and all the Executive Committee Members for attending the 5th Executive Committee Meeting for the term 2019-2021 online. He informed that it was very educative meeting. He further stated that it is very difficult to conduct online meeting than physical meeting.

FFFAI has done lot of representation and webinar during the COVID 19 pandemic and thanked the members for their support.

For Federation of Freight Forwarders' Associations in India

Sd/-

Dushyant Mulani
Honorary Secretary

To: All Executive Committee Members of FFFAI
To: All Member Associations of FFFAI
To: All Board of Advisors of FFFAI
To: All Nominees of Associate and Allied Members





[ESTD. 1962]

Annexure – A

Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

Antitrust Statement

"It is my duty to make you aware of your responsibilities in connection with competition/anti-trust Law.

In particular, I would like to remind you that no market agreements have been or will be decided at Managing Committee Meetings of FFFAI whether they involve prices, amounts or areas.

I would also like to make you aware that such behavior also outside of meetings is prohibited otherwise you could cause immense damage to your Federation and/or Company.

Should it be apparent that at a meeting, there is an attempt to make or discuss an open or hidden agreement regarding price, amount or area, I am obligated to intervene and if necessary to break off the meeting.

Should doubt exist whether an activity of FFFAI, to be discussed or decided upon, is admissible according to anti-trust law, I shall have the responsibility to terminate discussion as the Chairman of the Federation."

