



Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

FFFAI/MINUTES/087/2021

22.04.2021

Minutes of 8th Executive Committee Meeting held on 13.02.2021 on virtual platform

A) Members Present

S.No	Office Bearers	Representing Association	Attendance
1	Mr. A.V. Vijayakumar - Chairman	Chennai CHA Association	08/08
2	Mr. Shankar Shinde - Chariman - Elect	Nashik CHA Association	08/08
3	Mr. P.S.Atrey - Vice Chairman	Delhi Custom Brokers' Association	08/08
4	Mr. Rajesh Verma - Vice Chairman	Ludhiana CHA Association	06/08
5	Mr. Vinod Sharma - Vice Chairman	Pune CHA Association	08/08
6	Mr. Sudip Dey - Vice Chairman	Calcutta CHA Association	06/08
7	Mr. Alan Jose - Vice Chairman	Cochin CHA Association	08/08
8	Mr. Mandava Satyanarayana - Vice Chairman	Kakinada Customs Broker's Assn	07/08
9	Mr. Dushyant Mulani-Honorary Secretary	Brihanmumbai CB Association	08/08
10	Mr. Sudhir Agarwal - Honorary Treasurer	Nagpur CHA Association	07/08
11	Mr. S. Ramakrishna - Imm.Past Chairman	FFFAI	08/08
	Executive Committee Members	Representing Association	Attendance
12	Mr. Kartik A. Pancholi	Ahmedabad CHA Association	06/08
13	Mr. Devendra Thakker	Ahmedabad CHA Association	04/08
14	Mrs. Philomena Pereira	Aurangabad CHA Association	05/08
15	Mr. B.N.Rajmoghon	Association of CHA -Thiruvananthapuram	08/08
16	Mr. S. Nanda Prakash	Bangalore CHA Association Ltd	08/08
17	Mr. Kiran Rambhia	Brihanmumbai CB Association	07/08
18	Mr. Paresh Thakkar	Brihanmumbai CB Association	05/08
19	Mr. Subhash Chandra Ghosh	Calcutta CHA Association	05/08
20	Mr. S.Nataraja	Chennai CHA Association	07/08
21	Mr. R.N. Sekar	Chennai CHA Association	06/08
22	Mr. R. Kumar	Chennai CHA Association	08/08
23	Mr. S. Balaji	Chennai CHA Association	05/08
24	Mr. V. S. Pradeep	Cochin CHA Association	03/08
25	Mr. R. Rajesh Kumar	Coimbatore CH & SA Association	05/08
26	Mr. Dileep T. Abraham	Coimbatore CH & SA Association	06/08
27	Mr. G. A. Kalyanan Moorthy	Coimbatore CH & SA Association	04/08
28	Mr. Adil Khan	CHA Association Hyderabad	07/08
29	Mr. P.S.Rajkumar	CHA Association Hyderabad	05/08
30	Mr. Puneet Jain	Delhi CB Association	07/08





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

[ESTD. 1962]

31	Mr. Bhim Singh Jain	Delhi CB Association	05/08
32	Mr. Harjit Singh	Delhi CB Association	06/08
33	Mr. Vaneet Aggarwal	Delhi CB Association	06/08
34	Mr. Jogesh Sethi	Delhi CB Association	05/08
35	Mr. Amit Kamat	Goa CB Association	05/08
36	Mr. Ramesh Bansal	Kandla CB Association	07/08
37	Mr. Dhiren Chhaya	Kandla CB Association	06/08
38	Mr. Amit Khanna	Kanpur Customs Brokers Association	06/08
39	Mr. Philip C C	Mangalore CHA Association	06/08
40	Mr. Manoj Kotak	Mundra CB Association	03/08
41	Mr. Pramod Soneta	Mundra CB Association	05/08
42	Mr. T.V.Sujan	Mundra CB Association	05/08
43	Mr. A. Prasad	Nagpur CHA Association	06/08
44	Mr. Vipin Vohra	Noida Custom Brokers Association	07/08
45	Mr. Pankaj Lodaya	Pipavav Customs Broker's Assn	04/08
46	Mr. Rajdeepak Bharagava	Pune CHA Association	06/08
47	Mr. R. Sreedhar	Tuticorin Customs Broker's Assn	04/08
48	Mr. S. Sasikumar	Tuticorin Customs Broker's Assn	06/08
49	Mr. J.Pinto Villavarayar	Tuticorin Customs Broker's Assn	07/08
	Nominee of Associate Members	Port	Attendance
50	Mr. C.S. Nagendra Prasad	Bangalore	08/08
51	Mr. Chandrachari B.R.	Bangalore	05/08
52	Mr. Girish N	Bangalore	05/08
53	Mr. Shashidhar V.Hebbar	Bangalore	05/08
54	Mr. M.A.Zahir Hussan	Chennai	05/08
55	Mr. T.V.Gopu	Chennai	05/08
56	Mr. Ganpat P.Korade	Mumbai	07/08
57	Mr. Maruti R.Gadge	Mumbai	06/08
58	Mr.Tej Mayur Contractor	Mumbai	06/08
59	Mr. Palvinder Singh	New Delhi	06/08
60	Mr. J.Manikandan	Tuticorin	06/08
61	Mr. C.Karthikeya Prabu	Tuticorin	06/08
62	Mr. P.Jeyanth Thomas	Tuticorin	07/08
	Advisors	Representing Association	Attendance
63	Mr. Shantanu Bhadkamkar	FFFAI	01/08
64	Mr. Debashis Dutta	FFFAI	02/08
65	Mr. Samir J Shah	FFFAI	07/08





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

[ESTD. 1962]

	INVITEES		
66	Capt. Piyush Sinha - President	Aurangabad CHA Association	
67	Mr. P.Subramaniam - President	Coimbatore CH & SA Association	
68	Mr. Dinesh Gupta - President	Mundra CB Association	
69	Mr. Divakaran P Nair	Chennai	
B)	Member Not Present -Request for leave of absence received		
	Executive Committee Members	Representing Association	Attendance
1	Mr. Anurag Vijayvargiya	Indore CHA Association	02/08
2	Mr. Kiran D. Nagare	Nashik CHA Association	06/08
3	Mr. R. K. Mehrothra	Noida Custom Brokers Association	06/08
	Nominee of Associate Members	Port	Attendance
4	Mr. Nirav C. Thakker	Mumbai	07/08
5	Mr. A.S.Ramasamy	Tuticorin	06/08
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	03/08
2	Mr. Sarfaraz Khan	Aurangabad CHA Association	07/08
3	Mr. Suresh Kumar	Association of CHA -Thiruvananthapuram	07/08
4	Mr. Belli Gowda	Bangalore CHA Association Ltd	03/08
5	Mr. K.N.Shivanna	Bangalore CHA Association Ltd	02/08
6	Mr. Karunakar Shetty	Brihanmumbai CB Association	06/08
7	Mr. Vinayak Aparaj	Brihanmumbai CB Association	02/08
8	Mr. Hiren Ruparel	Brihanmumbai CB Association	04/08
9	Mr. Mannu Choudhary	Calcutta CHA Association	04/08
10	Mr. Vishal Dadha	Chennai CHA Association	05/08
11	Mr. Suraj Muraleedharan	Cochin CHA Association	04/08
12	Mr. T. Abhimanyu	CHA Association Hyderabad	04/08
13	Mr. Amit Kumar Jain	Indore CHA Association	04/08
14	Mr. J. A. D'souza	Goa CB Association	03/08
15	Mr. Sreeram Bhagawathi	Kakinada Customs Broker's Assn	03/08
16	Mr. Hemchandra B Yadav	Kandla CB Association	03/08
17	Mr. Sandip Mishra	Kanpur Customs Brokers Association	00/08
18	Mr. Narinder M. Prabhakar	Ludhiana CHA Association	00/08
19	Mr. Gurpreet Singh Bains	Ludhiana CHA Association	02/08
20	Mr. Shareef M	Mangalore CHA Association	03/08





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

[ESTD. 1962]

21	Mr. Pradeep Kale	Pune CHA Association	04/08
22	Mr. Chirag Shah	Pipavav Customs Broker's Assn	02/08
23	Mr. Arun Sharma	Rajasthan CHA Association	00/08
24	Mr. Jagvir Singh	Rajasthan CHA Association	01/08
25	Mr. Sunil Sharma	Rajasthan CHA Association	01/08
26	Mr. K. V. Krishna Kumar	Visakhapatnam Association	01/08
27	Mr. G.Rajesh	Visakhapatnam Association	01/08
28	Mr. P. Babu Rao	Visakhapatnam Association	00/03
29	Mr. Shankar Prasad Verma	West Bengal CHA Society	04/08
30	Mr. Sujit Chakraborty	West Bengal CHA Society	04/08
31	Mr. Swapan Chakraborty	West Bengal CHA Society	00/08
	Nominee of Associate Members	Port	Attendance
32	Mr. Balu S Govindrajan	Chennai	04/08
33	Mr. R. Lakshimipathy	Chennai	03/08
34	Mr. R. Radhakrishnan	Chennai	05/08
35	Mr. V.R.R. Bhagawathi	Kakinada	02/08
36	Mr. S.B.Salian	Mumbai	03/08
37	Mr. Soheli Kazani	Mumbai	02/08
38	Mr. Omprakash Agrawal	Mumbai	02/08
39	Capt. Ashish Samarth	Pune	05/08
40	Mr. V.Arjun Sankar	Tuticorin	00/08
41	Mr. M.V.Vijay Raghavan	Tuticorin	00/08
42	Mr. L. Cecil Machado	Tuticorin	04/08

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 and Board of Advisors for the 8th online Executive Committee Meeting and hoped to have physical meeting soon.

He made following announcement for the information of the house.

- 1) Mr. A. V. Vijayakumar was awarded with Certificate of Appreciation on occasion of International Customs Day 2021.
- 2) Mr. Rajesh Verma was awarded with Certificate of Commendation on occasion of International Customs Day, 2021.
- 3) Mr. B. R. Chandra Chari and his wife was awarded the Honorary Doctorate of Natural and Healthy Life Style, Physiotherapy and Social Service of Tamilnadu and Karnataka at IE University on 30th January, 2021.





He on behalf of Executive Committee Members congratulated the members for their recognition

He requested Chairman to address.

Mr. A. V. Vijayakumar extended warm welcome to the Executive Committee Members and Board of Advisor for 8th online Executive Committee Meeting and hope to conduct physical meeting depending upon the situation.

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

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.

Agenda no.3: To confirm the minutes of the 7th Executive Committee Meeting held on 05th December, 2020 for the term 2019-2021. (Already sent by e-mail to members)

Mr. Dushyant Mulani stated that minutes of the 7th Executive Committee Meeting held online on 5th December, 2020 were circulated in advance. He inquired with the house, if there were any observation.

As there were no observations the minutes of the 7th 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 7th Executive Committee Meeting held on 05th December, 2020 (2019-21)

Mr. Dushyant Mulani read out the action arising out of the minutes of the 7th Executive Committee Meeting held on 5th December, 2020.

- 1) *Problem faced by the members at their location with regard to ICDs/ Seafreight are requested to forward the same to FFFAI*

Mr. Dushyant Mulani stated that we have received feedback from members with regard to issued faced at ICD location and the same is being addressed by Mr. Vinod Sharma – Office Bearer, Incharge with CONCOR and other agencies. The details discussion will be done in the respective agenda point.

- 2) *Members to forward issues related to CAROTAR 2020 and Faceless Assessment to FFFAI Secretariat*

Mr. Dushyant Mulani informed that feedback from members is yet to be received from members on CAROTAR 2020. Members are requested to provide their feedback for making further representation and with regard to Faceless Assessment the same will be briefed by Chairman while discussing the Custom agenda point.





[ESTD. 1962]

Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

- 3) Members to provide number of service tax cases pending for adjudication and wherever cases adjudicated prefer for appeal

Mr. Dushyant Mulani stated that FFFAI has kept Special Knowledge Session during the Executive Committee Meeting wherein Advocate CA Gaurav Gupta will be addressing the members.

Agenda no.5: **To report on activities done**

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

Mr. Dushyant Mulani informed that following activities have been done by FFFAI

- i) Webinar on Advance Ruling by Mr. Joshua Ebenezer
- ii) Webinar on Post Budget 2021-22 Analysis by Mr. K. Vaitheeswaran.
- iii) FFFAI Officer Bearers attended meetings on behalf of FFFAI. **(Annexure B)**
- iv) FFFAI made various representation to CBIC and most recently was made on Faceless Assessment to Chairman, CBIC. **(list of representation made is as per annexure C)**
- v) FFFAI has circulated important circulars issued by CBIC **(Annexure D)**

Agenda no.6: **Open brief discussions on:**

Agenda no.6a: **Customs Matters/ CBLR**

Mr. A. V. Vijayakumar stated that we had regular interaction with CBIC regarding Faceless Assessment and based on our representation CBIC had issue three circulars in which few of the points are implemented properly in most of the locations. We have received the following feedback from the members after issuance of circular;

- i) Piecemeal queries are raised
- ii) Delay in assessment
- iii) Irrelevant open orders are given for examination to done under the presence of senior officers like AC, DC Docks,
- iv) The Officers are arbitrary loading the value without raising the query,
- v) Removing the notification and assessing the bill of entries,
- vi) Re-assessing the bill of entries without the concern of importer or Custom Brokers.

He added that based on above feedback received from the members FFFAI submitted representation to Chairman, CBIC which will be circulated to members. We are planning to have one more meeting with Chairman either physically or on virtual platform.

Mr. S. Nataraja conveyed that there is abnormal delay under Faceless Assessment and if PAG Officers give their support delay can be mitigated.

Mr. R. N. Sekar also pointed out the difficulties faced by trade by arbitrary enhancing the value without the consent of importer or exporter or Custom Broker. To rectify the same it takes considerable time. He further suggested that CBIC should issue fresh circular wherein such difficulty faced by the PAG Officer to rectify the wrong action.





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

[ESTD. 1962]

Mr. Devendra Thakker stated that as per notification no.81/2020 of CAROTAR importer needs to give the declaration but in the declaration lot of data needs to be provided and importer are unable to collect the same from the exporter. He suggested that declaration needs to streamline.

Mr. A. V. Vijayakumar replied that this is the matter of concern and we have represented matter with CBIC and suggested that importers association should also address the issue to CBIC.

Mr. G. A. Kalyana Moorthy stated that in certain cases PAG should be given power to pull back the bill of entry in the genuine case which will help the trade.

Mr. A.V. Vijayakumar replied that this provision is already there in the System to pull back the bill of entry to PAG but Officers are not using this power. He stated to take up with PAG through Turant Seva Kendra.

Mr. Dushyant Mulani supplementing stating that importer should make strong representation to local Commissioner and Chief Commissioner regarding the same and if still there is no reply the issue should be addressed to Member (Customs) with copy of local Chief Commissioner and Commissioner.

Mr. Jogesh Sethi queried whether there is any procedure if SVB order is nil loading but officers are insisting to load the value.

Mr. Dushyant Mulai stated that there were similar issues at Air Cargo and Nhava Sheva also and CBIC circular 05/2020 that the Assessment Officer cannot go beyond the valuation order stipulated in the investigation report.

Mr. Shankar Shinde informed that FFFAI is addressing the issue of Faceless assessment with the Board but when we seek the inputs from the members there are very few members who response hence requested members to please provide the difficulties faced by them to FFFAI Secretariat so that appropriate representation could be made to CBIC.

Mr. Gopu stated that RMS bill of entries filed under CAROTAR 2020 though the authentication has been verified, defacing has been done but in few bill of entries targeted instructions are being given. He further stated that when such instruction are coming the RMS people are referring back to the group after which it gets assessed.

He further added that most of the bill of entries are RMS generated but these RMS generated bill of entries are simply marked to the group stating to provide previous bill of entry, value to be referred back to assessment group. Though contemporaneous import value along with previous bill of entry are submitted but they are not considering and referring back to the Group.

Mr. A. V.Vijayakumar responded saying that RMS assessment bills of entry there is no problem but wherever re-assessment of bill of entry under CAROTAR after executing BG and Bond system automatically shows to approach the System Manager because they want to verify. FFFAI has already represented that it should be intimated at the time of assessment of Bill of Entry and not at the time of OOC.





[ESTD. 1962]

Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

Mr. Pramod Soneta queried whether there is any time limit for CAROTAR verification as the cargo is stuck for last 125 days and query has been forwarded to Singapore Customs though we have Singapore Customs RVC verified certificate but the Indian Custom or FTRA Committee is not acknowledging the RVC content verified by Singapore Customs and are insisting for reply from Singapore Customs. He suggested taking up the issue with the Board of fix the time limit for CAROTAR verification beyond the that the cargo should be released.

Mr. Dushyant Mulani stated that CBIC Notification 81/2020 and Circular 38/2020 specifically has laid down time limit of 60 days for verification but it can also be extended further for 60 days. He also - suggested to take up the issue with Member (Customs) if the time limited laid down in the notification are not adhered to.

Mr. S. Ramakrishna stated that FFFAI has been sending email communication, whatsapp message to members to provide the difficulties faced at their location but none of the members have responded. Recently circular with excel sheet was forwarded to members to provide details of CTH data versus PGA details which needs to be given to Single Window Commissioner as they are working on the same but none of the members have responded. He once again requested members to kindly forward the details in the excel sheet provided.

Mr. Dushyant Mulani informed that FFFAI has circulated important judgement to all members as members are facing considerable issues on;

- a) Amendment of Bill of Entry
- b) Hi-Tech Sweet Water Technologies Pvt. Ltd. Versus Commr. Of Customs (i) , Nhava Sheva Voluntary payment of Customs Duty is to be paid and they were levying fine and penalty.
- c) Dimension Data System which was held by Bombay High Court in continuation of UL Package Consignment which was held by Madras High Court which states that any change in classification can be permitted without going to appeal under provision of Section 149 which is read with Section 154.

It is very landmark judgement which states very clearly that provisions of Section 149 and Section 154 are clear and permit amendments of Law or correction of any facts. It is not required to go the Commissioner appeal every time. Importer and Custom Broker can apply to proper officer. This judgement can be cited by members whenever there is any change in classification or exemption notification erroneously not been claimed. **(Copies already circulated)**

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

Mr. Dushyant Mulani introduced Dr. CA Gaurav Gupta Ji to the house.

He further stated notices by Service Tax authorities has been most contiguous issues which is being faced by Custom Brokers across the country. Authorities are clubbing TDS deducting made by clients constructing that Custom Brokers have evaded the payment of service tax whereas TDS deduction is on reimbursable. Few of the members are still receiving the service tax notices on freight. He added that Dr. CA Gaurav Gupta Ji will guide on the same.





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

Dr CA Gaurav Gupta addressed the members on old show cause notices issued by the Service Tax Department.

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

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

Mr. A. V. Vijayakumar informed that Parliament has passed Major Port Trust Act by which they will get autonomous control.

Mr. Shankar Shinde stated that at Nhava Sheva for all the SEZ containers it required to obtain the CFS clearance and then file SEZ amendment and then move the container. It was represented to all the three ports to allow picking up directly from the port.

Mr. Divakaran Nair stated that at Chennai they had meeting with regards to implementation of Port Community System (PCS) and were informed that PCS is implemented but it is not effective at Chennai due to which the problem are being faced in the software maintained by shipping lines because they are not integrated with PCS. He requested to take up the issue with PCS to give username and password to all stakeholders.

Mr. A. V. Vijayakumar responded that not only at Chennai but at all locations it is not every effective though Government is pushing hard but unfortunately there are lot of resistance from lot of service providers. The Special Secretary (Logistics) has taken up the issue very seriously. FFFAI is also addressing the issue as PCS will reduce lot of documentation, physical presence of members.

Mr. Samir J. Shah stated that communication is being received that Mearsk Line is offering transportation and Custom Broking services. It is also observed that if the transportation service of Mearsk Line is used the allotment of container is much higher than not using their transportation. He opinion that Mearsk Line is not doing anything illegal as on import cycle Mearsk Line transportation is being used to go the ICD as they are sub-contracting Railways to reach over there. Mearsk Line has started empanelling Custom Brokers hence it is required to have discussion and debate on the same to give direction to our members as it will affect everybody in large way. He stated that we need to discuss and debate for further representation to authorities as to how these situation can be controlled since these big companies are using there dominant position which may work contrary to our interest.

Mr. A. V. Vijayakumar replied that we are discussing continuously on these subject for last four years. As per the information available Mearsk Line has appointed 75 Custom Brokers across India on their panel and most of them are our members from different location. CMA CGM has taken over the Ceva Freight and they are doing both Sea freight and Air Freight. He stated not only the shipping lines even the custodians like DP World, Adani they are doing transportation for their major client, and are entering into the Custom Broker services also. At Chennai one of the terminal is giving thirty days free period for the major customer who are handling more than two hundred boxes. The transportation is provided by them, thirty days free period inside the terminal and empty reposition is being done from their terminal free of cost to shipping lines. It is being challenge and threat for our members. He added that issues will be discussed with Office Bearers and Board of Advisors for having brainstorming session for our members that how to overcome this.





Mr. Dushyant Mulani said that there is an Public Notice issued by the Tuticorin Commissionerate stating that appointment of Custom Broker and billing by Custom Broker needs to be done directly to importer, exporter. With provisions of Section 146 importer, exporters needs to appoint licensed Custom Broker directly taking into consideration the public notice issued if Board can also issue circular stating that billing also to be done by Custom Broker directly to importer, exporters which will elevate the status of Custom Broker similar to Lawyers, Chartered Accountants.

Mr. Sudhir Agarwal stated for making any exports shipment shipping line is required, containers are required hence there are not much options available. Shipping lines have indirectly made the cartel and are in position to dominate the trade hence they are forcing the client to do whatever they want. He further stated that in certain cases the shipping lines are not giving the containers to the importer or exporter if they are not giving them the business hence importer or exporter are force to give them the business.

Mr. Vipin Vohra stated that few years back all the multinational companies started entering into the air freight business but the business of air freight brokers did not go away but the airfreight brokers grew with these multinationals. During the COVID -19 Pandemic lot of customers came back to the Custom Brokers as these multinationals had closed their offices but the Indian Custom Brokers, Freight Forwarders, importer or exporters were working. He suggested that members should be united, cooperate and collaborate with each other.

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

Mr. Vinod Sharma stated that he would like to take up the two points.

- i) Order issued by AERA to MIAL & Kale Logistics (GMAX) who are service provider and data provider in the system. Before 2016 they were charging 335/- (inclusive of GST) per master airway bill and were informing that it was aeronautical services. In the order it was stated that they were not aeronautical service hence it ordered that they should come at lower rate. He stated that MIAL & Kale Logistics never responded to the order issued by AERA and for the last two years they have started charging on per House Airway bill instead of Master Airway bill. He suggested to take up the issue seriously with AERA.

Mr. Vipin Vohra responded saying that when GMAX services was introduced in Mumbai there was lot of protest as this are part of services which should be provided by the terminal operator. It was strongly opposed by FFFAI and ACAAI to AERA but discussion was not in our favor.

- ii) Pune International Airport

Mr. Vinod Sharma stated that Pune International Airport is not functioning well due to lack of infrastructure, manpower. The issue has been addressed to Pune Airport Authorities and Commissioner of Pune but there is no response. He suggested to take up the issue with Airport Authority of India to provide proper infrastructure.

Mr. A. V. Vijayakumar requested to forward note on the same so that it could be taken up with Airport Authority of India (Action: Note to be provided by Mr. Vinod Sharma)





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

Mr. Vipin Vohra stated that during the COVID period Air India has started asking for cash payments but after taking strongly with Air India they have given the credit period of thirty days which is being done on pick and choose policy. Since Air India had starting asking for cash payment other foreign carrier also started the same practice during the COVID period though now they are back to IATA rule but the domestic carriers like Indigo, Spicejet are still asking for cash payment for domestic cargo. The issue was taken up strongly with Air India and other carriers to give the same credit as per IATA Rules.

He added that with regard to AFS, had personal meeting with Minister of Civil Aviation and informed that this policy was approved six years ago but till date none of the AFS are approved except the one which is functional at Chennai. Minister has informed Senior Economic Advisor to sort out the issue as soon as possible.

The other issue being taken up is with the police department that exports trucks should be given permission to run on any roads without time limit.

Mr. Vipin Vohra further conveyed that at Delhi close to airport or seaport there is no warehouse policy and recently policy has been approved in Lok Sabha that in every Green belt area warehouse can be built. Hence at each state there is Greenbelt area where the warehouse can be built and requested members can take this opportunity for expanding their business.

Agenda no.6f: ICD related issues

Mr. Rajesh Verma stated that there are many new ICDs coming up but the business volumes are not growing at ICDs. The new ICDs player are the Custodian, Shipping Lines and rate offered by them is totally lacking the transparency due to which Custom Brokers are facing lot of difficulties in running there business.

He further stated that shipping lines especially MSC are forcing the Custom Brokers to use the third party software which has increased the cost of operations at ICDs.

Mr. Rajesh Verma further added that Shipping lines and Custodians did not adhering to order given by Ministry of Shipping, Ministry of Finance during the COVID Pandemic for waiving of demurrage. There is similar situation in Punjab for last two months due to farmers' agitation there were no train to moving in or out Punjab due to which all the containers are lined but could not railed out. Trade is facing considerable difficulties since shipping lines are imposing penalty due to none movement of containers.

Now the Shipping lines have given unpractical time limit of seven to ten days to the trade to handover the container to them at Gateway port which practically is not possible as in normal scenario also it takes around fourteen to fifteen days on an average to reach container at gateway port. The shipping lines have deliberately done this so that Custom Brokers opts for carriage haulage and whole incentive basic discount with the custodian will go to shipping lines as they will pay, accept at the local custom station.





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

He further stated that for import container if there is block of five containers under one BL then all the containers does not come together at same time due to which free period is over. It is required to file the documents to avoid late submission. The partial delivery of containers cannot be taken at ICD except of Homogenous goods which is given manually.

Due to farmers agitation the Adani port is closed for almost two months and the export containers are stuck over there and shipping lines are asking for penalty and demurrage. He stated that request was made to agitating farmer to allow Custom Brokers to go inside the terminal as there is loss of revenue to which they have agreed and are allowing five to six people to go inside the terminal and get the custom clearance done but are not able to move the cargo because the gates are closed. The two Shipping Lines have agreed to waive the demurrage charges on case to case basis the only shipping lines which is not agreeing to waive is Hapag Lloyd.

The Custodians are requesting the Custom Brokers to sign the agreement on behalf of our client. Copy of the contract is forwarded to all Office Bearers for discussing. He opined that as Custom Broker we should not sign the agreement on behalf of our client as whole responsibility will come on Custom Brokers.

Mr. Dileep Abraham stated that during 2018-2019 there was reorganization of Custom station and Coimbatore was attached to Trichy. It was represented to the Board and grievance portal stating that Coimbatore is major location but the representation was forwarded back to Trichy Commissionerate to look into the matter. The Trichy Commissionerate close the matter stating that it is policy matter hence cannot be decided by the Commissionerate.

He further stated that Coimbatore and Tirupur Custom Brokers are able to file the documents only in Coimbatore and Tirupur whereas Trichy Commissionerate encompasses large area. It has been representation various time but there is no response.

He continued saying that there is shortage of container at ICD locations but port are having their own.

Mr. A. V. Vijayakumar requested to share the copy of representation made by Coimbatore. He said shortage of Container is Pan India issue which is being addressed by various trade associations and Chamber of Commerce.

Mr. Vinod Sharma stated that EGM filed at ICD locations needs to again filed at airport and while feeding the data again there are lot of errors. It was understood that DG System is coming up with the module where ICD location will automatically get connected with gateway airport. He queried whether the module has been implemented if not to take up the issue with DG System as members are facing lot of problem.





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

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

Mr. Dushyant Mulani informed that we have received communication from Bangalore Custom House Agents Associations Ltd., stating that Bangalore Association had their AGM and new Committee has taken charge. He read out the names of the newly elected Officer Bearers of Bangalore Custom House Agents Associations Ltd.

Sr. No	Name	Designation
1	Mr. Shashidhar Hebbar	President
2	Mr. Balasubramanian S.	Vice President
3	Mr. Rooopesh Kumar Narayanan	Vice President
4	Mr. Girish N	Honorary Secretary
5	Mr. Puttaraju	Honorary Treasurer
6	Mr. Chandra R	E.C. Member
7	Mr. Chandrappa K. T	E.C. Member
8	Mr. Hari Rao R	E.C. Member
9	Mr. Krishnamoorthy R	E.C. Member
10	Mr. Muniraju S	E.C. Member
11	Mr. Munikrishna C	E.C. Member
12	Mr. Manjunath V	E.C. Member
13	Mr. Ravi Salunke	E.C. Member

He on behalf of entire Executive Committee Members congratulated all the newly elected Office Bearers and Executive Committee Members of Bangalore Custom House Agents Associations Ltd., and requested them to participate in the activities of FFFAI.

Agenda no.7: **To discuss about Indian Institute of Freight Forwarders matters: (IIFF)**

Mr. Tej Contractor briefing the member stated there is great interest on education and skill development not at national/ local level but also at Government level and said;

- IIFF is running FIATA Diploma program of 323 hours which is approximately eleven months. It has been decided to have program every six months so that learner gets engaged and trade gets good skilled manpower.

Tie up with all Maritime Institute to conduct the IIFF program.

- IIFF has decided to collaborate and tie-up with other Institutions who will be conducting IIFF Diploma program along with the courses run by the Institute. The curriculum and examination will be controlled by IIFF so that teaching remains relevant, the institutions will pay royalty per student to IIFF.
- IIFF is looking for Digital partner who are specialised in logistics training where IIFF will create content, host it on the digital platform. Once that is create IIFF will be able to reach much larger audience.





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

As per meeting with Special Secretary Logistics, through Indian Institute of Foreign Trade Government is looking for creating a one single national logistics portal to address all knowledge requirements of the freight forwarding and Custom Broking industry in India. The following should be available on the portal

- All documents requirements, rules etc. such as Frequently asked question, Training material and upscale of human capital of Exports importers and all logistics stake holders

He further added that training will be done at three level namely;

- Operational level
- Mid-level
- Senior level

All the subject would be covered related to Maritime trade and training will be done in four steps

- Formal training – classroom or online training
- Self-study
- Internship
- Digital program

He requested Member Associations to conduct the skill program for the local members in their respective locations.

- 1) Formal training – classroom or online training
- 2) Self-study
- 3) Internship
- 4) Digital program

He requested Member Associations to conduct the skill program for the local members in their respective locations.

Agenda no.8: To approve applications received from Associate and Allied membership of FFFAI

Mr. Dushyant Mulani informed members that FFFAI had received ten new applications for Associate membership 6 new applications for Allied membership. He said that the applications were in order and requested the approval of the house for their admittance to the membership of FFFAI.

The house unanimously approved all the applications received for the membership of FFFAI. **(Annexure C)**

Agenda no.8a: To discuss about attestation of Allied Member Application by Member Associations

Mr. Dushyant Mulani stated Allied members who wanted to get enrolled as member of FFFAI are required to get their application attested by local Member Association in whose jurisdiction they carry out the business which is take time for the allied member to submit their application to FFFAI hence needs to be discussed.





Mr. A. V. Vijayakumar replied at present it is required to take the attestation of local association from where they are applying and will discuss in the next meeting till that time status-quo should be maintained.

Mr. Alan Jose stated that local association should have control on the allied members applying for membership of FFFAI. At Cochin, Cochin Association has amended their Constitution and are enrolling them as Associate member of Cochin Association and then giving the attestation for enrolling as Allied member in FFFAI. He suggested that practice should not be changed now.

Mr. Shantanu Bhadkamkar stated that this issue has been deliberated several times since we started enrolling Allied members. The NOC requirement from the local association was just to intimate them and knowing them whether they had anything against the particular applicant. He suggested that FFFAI should not be strict and some leniency should be given by keeping allied membership simple and under umbrella of FFFAI otherwise they will move elsewhere and find another forum.

Agenda no.9: To announce date and venue of next EC Meeting

Mr. A. V. Vijayakumar informed that we are trying to have physical meeting if the situation improves hence the date and venue will be intimate to members well in advance.

Agenda no.10: To discuss about conducting 24th Biennial Convention of FFFAI

Mr. A. V. Vijayakumar stated it has been already decided to conduct the 24th Biennial Convention at Chennai. We shall update the members about the date after discussing in the Office Bearers meeting.

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

Mr. Shantanu Bhadkamkar said he is willing to assist in brainstorming session. After one session we can have brainstorming sessions with multiple association. He stated that AMTOI is perusing SRO (Self Regulating Organisation) and even FFFAI had similar initiative particularly for getting IIFF approved as Institute by CBIC for getting prequalified which can be applicable for participants enrolling for Rule 6 examination.

Mr. Jogesh Sethi stated he had applied for renewal of AEO but the renewal is still pending for the last one year and department is insisting for more and more documents to be submitted. He further queried what is the role of MSME in AEO as while renewing in the annexure it is required to mention whether we are MSME or not. He queried what the benefits are after getting enrolled as MSME or AEO as all the benefits are given to the importers.

Mr. Shankar Shinde responded that MSME and AEO are different hence have different benefits. AEO are safety player in the whole supply chain in the international market. Custom Broker license is renewed automatically as far as AEO is valid, waiver of renewal fees and in future they will add AEOs on RMS which is being looked into by the department.





[ESTD. 1962]

Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

Vote of Thanks

Mr. A. V. Vijayakumar thanked members to attending the meeting in large number.

Mr. Dushyant Mulani thanked Executive Committee Members to attend the online meeting. He informed that we have good attendance for the 8th Executive Committee Meeting. He thanked Chairman for his guidance. He thanked all the Office Bearers, Executive Committee Members and Board of Advisors for their contribution and requested to continue the same in the future also.

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]

Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

Annexure (A)

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."





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

Annexure (B)

Sr. No	Date	Particular	Attended by
1	05.01.2021	39th meeting of BOG – IITM	Mr A. V. Vijayakumar
2	19.01.2021	First State Conference on Logistics	Mr. A V Vijayakumar & Mr. Shankar Shinde
3	20.01.2021	AMTOI 2nd Extended Board Meeting	Mr. A V Vijayakumar & Mr. Shankar Shinde
4	25.01.2021	Webinar on pre-budget suggestions for Logistics Industry	Mr. A. V. Vijayakumar
5	02.02.2021	Chabahar Port event by Afghanistan Consulate	Mr. Shankar Shinde
6	04.02.2021	Follow up meeting with Special Secretary (Logistics) with Industry Association & Stakeholders – FICCI	Mr. A. V. Vijayakumar, Mr. Shankar Shinde, Mr. Dushyant Mulani
7	09.02.2021	To discuss the strategy and other related issues for Chabahar Day to be held on 4th March, 2021.	Mr. Shankar Shinde
8	09.02.2021	The meeting of SSD 01-Transport Services Sectional Committee	Mr. Alan Jose
9	12.02.2021	Meeting with Special Secretary (Logistics) MoC	All Office Bearers & IIFF Team





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

Annexure (C)

Representation made between 5th December, 2020 to 11th February, 2021

Sr. No	Date	Topic	Addressed to
1	05.12.2020	Representation made to include the name of Custom Brokers, Freight Forwarders and their employees in the list of priority for Vaccination	Secretary, Ministry of Social Justice & Empowerment
2	26.12.2020	Feedback given on The Merchant Shipping Bill, 2020 - Section 323	Shri G. Ananthanarayanan, Under Secretary to GOI, Ministry of Ports, Shipping and Waterways, MG Section
3	01.01.2021	Handling of COVID Vaccine consignment	Shri Narendra Modi - Honourable Prime Minister of India
4	06.01.2021	Appointment of Nodal Officer to address issues with regard Remission of Duties and Taxes on Exported Products (RoDTEP) Scheme gets implemented from 01.01.2021	Mr. Sandeep Bhatnagar - Member (Customs), CBIC
5	06.02.2021	Letter regarding anomaly/ doubt in the notification no.02/2021	Shri G. D. Lohani - Jt. Secreary (TRU - I), Shri Gaurav Masaldan - JS (Customs), Shri R. Ananath - Director (Customs), CBIC
6	08.02.2021	Representation regarding issues faced under Faceless Assessment	Mr. Ajit Kumar - Chairman & Mr. Sandeep Bhatnagar - Member (Customs), CBIC





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

Annexure (D)

Sr. No	Particular	Date	Circular no	Link
1	Third Party Invoicing in case of Preferential Certificates of Origin issued in terms of DFTP for "wholly obtained goods"	08.12.2020	53/2020	https://www.cbic.gov.in/resources//htdocs-cbec/customs/cs-circulars/cs-circulars-2020/Circular-No-54-2020-updated.pdf
2	Special measures to facilitate MSME for AEO T1& T2 accreditation [Circular No. 54/2020-Customs dated 15.12.2020]	15.12.2020	54/2020	https://www.cbic.gov.in/htdocs-cbec/customs/cs-circulars/cs-circulars-2020/Circular-No-54-2020-updated.pdf
3	Faceless Assessment- Clarifications on the Issues raised by Stakeholders	15.12.2020	55/2020	https://www.cbic.gov.in/htdocs-cbec/customs/cs-circulars/cs-circulars-2020/Circular-No-55-2020.pdf
4	Import and Export of vaccines in relation to COVID-19 through courier.	30.12.2020	56/2020	https://www.cbic.gov.in/htdocs-cbec/customs/cs-circulars/cs-circulars-2020/Circular-No-56-2020-new.pdf
5	Implementation of PGA eSANCHIT– Paperless Processing under SWIFT-Uploading of Licenses/Permits/Certificates/Other Authorizations (LPCOs) by PGAs	30.12.2020	57/2020	https://www.cbic.gov.in/htdocs-cbec/customs/cs-circulars/cs-circulars-2020/Circular-No-57-2020.pdf
6	Transshipment of Import & Export Cargo via Sri Lanka and Bangladesh-Waiver of bank guarantee	14.01.2021	01/2021	https://www.cbic.gov.in/htdocs-cbec/customs/cs-circulars/cs-circulars-2021/Circular-No-01-2021-new.pdf
7	Systemic improvements regarding modification in the Bond (B-17) Execution process	03.02.2021	03/2021	https://www.cbic.gov.in/htdocs-cbec/customs/cs-circulars/cs-circulars-2021/Circular-No-03-2021.pdf
8	Mandatory uploading of documents in e-Sanchit	14.01.2021	02/2021	ICES Advisory No. 02_2021 - Mandatory uploading of documents in e-Sanchit_r.pdf
9	Mandatory uploading of documents in e-Sanchit – Certain Clarifications	26.01.2021	04/2021	ICES Advisory 04_2021 on Certain Clarifications iro Mandatory Docs.pdf
10	Mandatory uploading of documents in e-Sanchit – Further Clarifications	26.01.2021	06/2021	ICES Advisory 06_2021 on Further Clarifications iro Mandatory Docs.pdf
11	ICES Advisory on BUDGET 2021 RELATED Changes in EDI System	02.02.2021	07/2021	ICES Advisory on BUDGET RELATED Changes in EDI System_vf.pdf
12	Clarifications on SCMTR Registration related issues	05.02.2021	08/2021	ICES Advisory No. 08_2021 - Clarifications on SCMTR Registration related issues.pdf





Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

Annexure (E)

LIST OF NEW ASSOCIATE MEMBERS

Sr No	Name of Members	Applied From	Enclosure	Attested by
1	Eshwa Shipping & Logistics Pvt.Ltd	Chennai	CB License	CCHAA
2	Accord Global Logistics Pvt.Ltd	Mumbai	CB License	BCBA
3	Kanvel Logistics	Mumbai	CB License	BCBA
4	Emirates Logistics India Pvt.Ltd	Mumbai	CB License	BCBA
5	PT Trans Global Logistics Pvt.Ltd	Mumbai	CB License	BCBA
6	Waves Intercontinental Pvt.Ltd	Mumbai	CB License	BCBA
7	VSD Shipping LLP	Mumbai	CB License	BCBA
8	Shreenath Logistics	Mumbai	CB License	BCBA
9	Seair Global Pvt.Ltd	Mumbai	CB License	BCBA
10	Welfreight India Pvt.Ltd	Kolkata	CB License	CCHAA

LIST OF NEW ALLIED MEMBERS

Sr No	Name of Members	Applied From	Enclosure	Attested by
1	Intercont Freight Liners Pvt.Ltd	Mumbai	MTO Certificate	BCBA
2	KMS Logistics & Shipping Pvt.Ltd	Mumbai	MTO Certificate	BCBA
3	Vista Logistics Pvt.Ltd	New Delhi	MTO Certificate	DCBA
4	Strive Shipping Services Pvt.Ltd	New Delhi	MTO Certificate	DCBA
5	SKY Logitrans Pvt.Ltd	New Delhi	MTO Certificate	DCBA
6	S.N.Logistics Pvt.Ltd	Chandigarh	MTO Certificate	LCHAA

