



# Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

FFFAI/MINUTES/192/2021

13.08.2021

Minutes of the 10<sup>th</sup> Executive Committee Meeting held on 12<sup>th</sup> June, 2021 on virtual platform

## A) Members Present

S.No	Office Bearers	Representing Association	Attendance
1	Mr. A.V. Vijayakumar - Chairman	Chennai CHA Association	10/10
2	Mr. Shankar Shinde - Chairman - Elect	Nashik CHA Association	10/10
3	Mr. P.S.Atree - Vice Chairman	Delhi Custom Brokers' Association	10/10
4	Mr. Rajesh Verma - Vice Chairman	Ludhiana CHA Association	08/10
5	Mr. Vinod Sharma - Vice Chairman	Pune CHA Association	10/10
6	Mr. Sudip Dey - Vice Chairman	Calcutta CHA Association	08/10
7	Mr. Mandava Satyanarayana - Vice Chairman	Kakinada Customs Broker's Assn	09/10
8	Mr. Dushyant Mulani-Honorary Secretary	Brihanmumbai CB Association	10/10
9	Mr. Sudhir Agarwal - Honorary Treasurer	Nagpur CHA Association	09/10
10	Mr. S. Ramakrishna - Imm.Past Chairman	FFFAI	10/10
	<b>Executive Committee Members</b>	<b>Representing Association</b>	<b>Attendance</b>
11	Mr. Kartik A. Pancholi	Ahmedabad CHA Association	08/10
12	Mr. Devendra Thakker	Ahmedabad CHA Association	05/10
13	Mrs. Philomena Pereira	Aurangabad CHA Association	07/10
14	Mr. B.N.Rajmoghon	Association of CHA -Thiruvananthapuram	10/10
15	Mr. Suresh Kumar	Association of CHA -Thiruvananthapuram	08/10
16	Mr. Belli Gowda	Bangalore CHA Association Ltd	05/10
17	Mr. Karunakar Shetty	Brihanmumbai CB Association	07/10
18	Mr. Kiran Rambhia	Brihanmumbai CB Association	09/10
19	Mr. Paresh Thakkar	Brihanmumbai CB Association	07/10
20	Mr. Hiren Ruparel	Brihanmumbai CB Association	06/10
21	Mr. Subhash Chandra Ghosh	Calcutta CHA Association	07/10
22	Mr. Mannu Choudhary	Calcutta CHA Association	06/10
23	Mr. S.Nataraja	Chennai CHA Association	09/10
24	Mr. R.N. Sekar	Chennai CHA Association	08/10
25	Mr. R. Kumar	Chennai CHA Association	10/10
26	Mr. Vishal Dadha	Chennai CHA Association	07/10
27	Mr. S. Balaji	Chennai CHA Association	06/10
28	Mr. V. S. Pradeep	Cochin CHA Association	04/10
29	Mr. Suraj Muraleedharan	Cochin CHA Association	05/10
30	Mr. R. Rajesh Kumar	Coimbatore CH & SA Association	07/10
31	Mr. Dileep T. Abraham	Coimbatore CH & SA Association	08/10

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32	Mr. Adil Khan	CHA Association Hyderabad	09/10
33	Mr. P.S.Rajkumar	CHA Association Hyderabad	06/10
34	Mr. T. Abhimanyu	CHA Association Hyderabad	06/10
35	Mr. Puneet Jain	Delhi CB Association	09/10
36	Mr. Bhim Singh Jain	Delhi CB Association	07/10
37	Mr. Harjit Singh	Delhi CB Association	08/10
38	Mr. Vaneet Aggarwal	Delhi CB Association	09/10
39	Mr. Jogesh Sethi	Delhi CB Association	08/10
40	Mr. Hemchandra B Yadav	Kandla CB Association	04/10
41	Mr. Dhiren Chhaya	Kandla CB Association	08/10
42	Mr. Amit Khanna	Kanpur Customs Brokers Association	08/10
43	Mr. Philip C C	Mangalore CHA Association	07/10
44	Mr. Manoj Kotak	Mundra CB Association	04/10
45	Mr. A. Prasad	Nagpur CHA Association	08/10
46	Mr. Kiran D. Nagare	Nashik CHA Association	08/10
47	Mr. Vipin Vohra	Noida Custom Brokers Association	09/10
48	Mr. Pradeep Kale	Pune CHA Association	06/10
49	Mr. Rajdeepak Bharagava	Pune CHA Association	08/10
50	Mr. R. Sreedhar	Tuticorin Customs Broker's Assn	05/10
51	Mr. S. Sasikumar	Tuticorin Customs Broker's Assn	08/10
52	Mr. J.Pinto Villavarayar	Tuticorin Customs Broker's Assn	08/10
53	Mr. Shankar Prasad Verma	West Bengal CHA Society	06/10
54	Mr. Sujit Chakraborty	West Bengal CHA Society	06/10
	<b>Nominee of Associate Members</b>	<b>Port</b>	<b>Attendance</b>
55	Mr. C.S. Nagendra Prasad	Bangalore	10/10
56	Mr. Chandrachari B.R.	Bangalore	06/10
57	Mr. Girish N	Bangalore	07/10
58	Mr. Shashidhar V.Hebbar	Bangalore	07/10
59	Mr. Balu S Govindrajan	Chennai	07/10
60	Mr. M.A.Zahir Hussan	Chennai	06/10
61	Mr. T.V.Gopu	Chennai	07/10
62	Mr. Ganpat P.Korade	Mumbai	09/10
63	Mr. Maruti R.Gadge	Mumbai	08/10
64	Mr. Nirav C. Thakker	Mumbai	09/10
65	Mr. Omprakash Agrawal	Mumbai	04/10
66	Mr.Tej Mayur Contractor	Mumbai	08/10
67	Mr. Palvinder Singh	New Delhi	08/10
68	Capt. Ashish Samarth	Pune	07/10
69	Mr. A.S.Ramasamy	Tuticorin	08/10

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70	Mr. C.Karthikeya Prabu	Tuticorin	08/10
71	Mr. P.Jeyanth Thomas	Tuticorin	09/10
72	Mr. J.Manikandan	Tuticorin	07/10
73	Mr. L. Cecil Machado	Tuticorin	05/10
	<b>Advisors</b>	<b>Representing Association</b>	<b>Attendance</b>
74	Mr. Shantanu Bhadkamkar - Advisor	FFFAI	02/10
75	Mr. Samir J Shah	FFFAI	09/10
	<b>INVITEES</b>		
76	Mr. P.Subramaniam - President	Coimbatore CH & SA Association	
77	Mr. Dinesh Gupta - President	Mundra Customs Brokers Association	
<b>B)</b>	<b>Member Not Present -Request for leave of absence received</b>		
	<b>Executive Committee Members</b>	<b>Representing Association</b>	<b>Attendance</b>
1	Mr. Alan Jose - Vice Chairman	Cochin CHA Association	09/10
2	Mr. Devang Joshi	Ahmedabad CHA Association	03/10
	Mr. S. Nanda Prakash	Bangalore CHA Association Ltd	08/10
	Mr. K.N.Shivanna	Bangalore CHA Association Ltd	02/10
3	Mr. Amit Kamat	Goa CB Association	06/10
4	Mr. Anurag Vijayvargiya	Indore CHA Association	02/10
5	Mr. Ramesh Bansal	Kandla CB Association	07/10
6	Mr. Pramod Soneta	Mundra CB Association	05/10
7	Mr. T.V.Sujan	Mundra CB Association	05/10
8	Mr. R. K. Mehrothra	Noida Custom Brokers Association	06/10
9	Mr. Pankaj Lodaya	Pipavav Customs Broker's Association	05/10
10	Mr. Arun Sharma	Rajasthan CHA Association	00/10
	<b>Nominee of Associate Members</b>	<b>Port</b>	<b>Attendance</b>
11	Mr. R. Radhakrishnan	Chennai	05/10
<b>C)</b>	<b>Member Not Present -Request for leave of absence Not received</b>		
S.No	<b>Executive Committee Members</b>	<b>Representing Association</b>	<b>Attendance</b>
1	Mr. Vinayak Aparaj	Brihanmumbai CB Association	02/10
2	Mr. G. A. Kalyanan Moorthy	Coimbatore CH & SA Association	05/10
3	Mr. J. A. D'souza	Goa CB Association	03/10
4	Mr. Amit Kumar Jain	Indore CHA Association	05/10
5	Mr. Sreeram Bhagawathi	Kakinada Customs Broker's Assn	04/10
6	Mr. Sandip Mishra	Kanpur Customs Brokers Association	00/10
7	Mr. Narinder M. Prabhakar	Ludhiana CHA Association	00/10
8	Mr. Gurpreet Singh Bains	Ludhiana CHA Association	02/10
9	Mr. Shareef M	Mangalore CHA Association	03/10

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311-313, Mahinder Chambers, W. T. Patil Marg, Chembur, Mumbai – 400 071

Tel: 022-67107495/ 96 | Fax: 022-67107500 | Email: [info@ffai.org](mailto:info@ffai.org) | Website: [www.ffai.org](http://www.ffai.org)





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10	Mr. Chirag Shah	Pipavav Customs Broker's Association	02/10
11	Mr. Jagvir Singh	Rajasthan CHA Association	01/10
12	Mr. Sunil Sharma	Rajasthan CHA Association	01/10
13	Mr. K. V. Krishna Kumar	Visakhapatnam Association	01/10
14	Mr. G.Rajesh	Visakhapatnam Association	01/10
15	Mr. P. Babu Rao	Visakhapatnam Association	00/04
16	Mr. Swapan Chakraborty	West Bengal CHA Society	05/10
	<b>Nominee of Associate Members</b>	<b>Port</b>	<b>Attendance</b>
17	Mr. R. Lakshimipathy	Chennai	04/10
18	Mr. V.R.R. Bhagawathi	Kakinada	02/10
19	Mr. Sohel Kazani	Mumbai	03/10
20	Mr. S.B.Salian	Mumbai	03/10
21	Mr. V.Arjun Sankar	Tuticorin	00/10
22	Mr. M.V.Vijay Raghavan	Tuticorin	00/10

Agenda no.1: **Meeting call to order by Hon Secretary.**

**Welcome Address by Chairman –FFFAI**

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Honorary Secretary – Mr. Dushyant Mulani welcomed the Executive Committee Members and Board of Advisors for the 10<sup>th</sup> online Executive Committee Meeting held on virtually.

He requested Chairman to address.

Mr. A. V. Vijayakumar extended warm welcome to the Executive Committee Members and Board of Advisor for 10<sup>th</sup> 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)**

He informed the members about the sad demise of Past Chairman and Board of Advisor Late Shri N. T. Rama Rao on 29<sup>th</sup> April, 2021. He stated that Late Shri N. T. Rama Rao served as FFFAI Chairman and with his dynamic leadership served the fraternity very well. He was also President of Chennai Association for two terms.

He requested house to observe two minutes silence in respect of departed soul to rest in peace.

He requested members to share the fond memories late Shri N. T. Rama Rao. The following members paid tribute to him by sharing their memories.

- a) Mr. Shantanu Bhadkamkar
- b) Mr. Samir J. Shah
- c) Mr. V. S. Pradeep
- d) Mr. Dushyant Mulani
- e) Mr. Shankar Shinde
- f) Mr. S. Nataraja

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Mr. A. V. Vijayakumar requested to pass the resolution and forward to his family and prayed for the departed soul in peace.

## 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 the following Executive Committee members and if the house approves leave of absence can be granted.

Sr.	Executive Committee Members	Representing Association
1	Mr. Alan Jose - Vice Chairman	Cochin CHA Association
2	Mr. Devang Joshi	Ahmedabad CHA Association
3	Mr. S. Nanda Prakash	Bangalore CHA Association Ltd
4	Mr. K.N.Shivanna	Bangalore CHA Association Ltd
5	Mr. Amit Kamat	Goa CB Association
6	Mr. Anurag Vijayvargiya	Indore CHA Association
7	Mr. Ramesh Bansal	Kandla CB Association
8	Mr. Pramod Soneta	Mundra CB Association
9	Mr. T.V.Sujan	Mundra CB Association
10	Mr. R. K. Mehrothra	Noida Custom Brokers Association
11	Mr. Pankaj Lodaya	Pipavav Customs Broker's Association
12	Mr. Arun Sharma	Rajasthan CHA Association

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

## Agenda no.3: **To confirm the minutes of the 9<sup>th</sup> Executive Committee Meeting held on 27<sup>th</sup> April, 2021 for the term 2019-2021. (Already sent by e-mail to members)**

Mr. Dushyant Mulani stated that minutes of the 9<sup>th</sup> Executive Committee Meeting held online on 27<sup>th</sup> April, 2021 were circulated in advance. He inquired with the house, if there were any observation.

***As there were no observations the minutes of the 9<sup>th</sup> 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 9<sup>th</sup> Executive Committee Meeting held on 27<sup>th</sup> April, 2021 (2019-21)**

Mr. Dushyant Mulani read out the action arising out of the minutes of the 9<sup>th</sup> Executive Committee Meeting held on 27<sup>th</sup> April, 2021.





1. *Members to forward issues related to CAROTAR 2020, Faceless Assessment, E-office, TSK to FFFAI Secretariat*

Mr. Dushyant Mulani informed that FFFAI has made two representation to CBIC regarding CAROTAR 2020, Faceless Assessment, E-office and TSK.

2. *Points sponsored by FFFAI for the SCOPE-Air & SCOPE-Shipping meeting to be circulated to all ECM*

Mr. Dushyant Mulani stated that based on the inputs received from the members FFFAI has sponsored the points to be included in the agenda of SCOPE-Air and SCOPE-Shipping meeting.

3. *Mr. Amit Kamat to forward copy of representation made by Goa Association to have FSSAI testing laboratory in Goa*

Mr. Dushyant Mulani informed that copy representation made by Goa Association to FSSAI for having testing laboratory at Goa is awaited from Mr. Amit Kamat.

4. *Additional duty being captured while filing bill of entry under Chapter 2710*

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Mr. Dushyant Mulani informed that FFFAI had made representation to the Board and based on the representation Board has asked Commissionerate across the country that till the time anomaly is rectified in the custom tariff and there is a separate line item in the EDI System the reassessing, recalling of bill of entry should be done at DC level instead of approaching Additional Commissioner or Commissioner for the wrong additional duty which is being levied for this custom tariff heading. FFFAI will be addressing the issue once again. He requested the associations who are facing this issue to kindly represent the issue with the local Commissioner and with the help the local Commissioner we can take up the issue with the Board.

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 read out the important events held in the last two months.

Sr. No	Event
i)	Meeting was held by Mr. R. Ananth, IRS – Deputy Secretary (Customs), CBIC in the trade facilitation measures for COVID – 19 Pandemic when the lock down was very acute practically all across the country. FFFAI had represented lot of issues pertaining to COVID related matter.
ii)	The farewell program of Ms. Vandana Aggarwal was very well attended by participations across the country. She shared a valuable foresight for our industry.





iii)	Webinar on motivate, moderate, monitor with Mr. Shashi Kiran Shetty which was conceptualized by Chairman of FFFAI and Mr Paresh Thakkar – Convener of Shipping Committee. The Pearls of wisdom shared by the legend were exemplary.
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He further read out the meetings attended by FFFAI nominees.

Sr. No	Meetings attended
i)	Chairman attended the sub-committee on trade facilitation organized by CII
ii)	FFFAI has given valuable suggestion for LSC awards.

He requested Chairman to brief on the inputs given by FFFAI for LSC awards.

Mr. A. V. Vijayakumar stated trade facilitation meeting which was organized by CII was attended by other trade partners also. FFFAI highlighted the three major points.

- a) Faceless Assessment
- b) Digitalization of Customs activity
- c) AEO Certification process

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CII will compile the suggestion given by the stakeholders for submitting to the Ministry.

He further informed that there was logistic sub-committee meeting organized by FICCI under the leadership of Special Secretary (Logistics). The consultant has prepared the document regarding criteria and eligibility for award. There will be separate category for Custom Brokers and there will be two awards in the recommendation i.e. small, medium one category and large category. FFFAI is the part of Jury for category of Custom Brokers as well as freight forwarders.

He further added that we had meeting with LSC, LSC wants FFFAI to participate in the internship for which details have been circulated to all Presidents of Member Associations. There are about six hundred students who will be completing their course and these students' needs to be given internship in the office of our members.

Mr. Samir J. Shah stated that for enhancing skill development the Government of India has laid done the process for training the fresh applicants.

Every state should have a skill development corporation but all have been not developed by the state. The Government of India has set up Skill Development Corporation known as National Skill Development Corporation (NSDC). NSDC and skill development are being discussed in our meeting and we are arranging small programs at various locations which falls under skill development program

He explained the members that Logistics Skill Council along with a twenty one colleagues in India is offering three year degree program in logistics. The students who will complete their program will be Graduate in logistics. Customs Brokers are part of the exim logistics hence will be able to employee these students as they will be Graduates after completing the program. The module done at the





Logistics Skill Council is that students will attend college for six months and six months they will work in some company as internship this is how three years course will be complete which means students will have eighteen months as classroom study and eighteen months online job training. The online job training can be taken at warehouse, cold storage, custodians, cold chain, custom brokers, freight forwarders, etc.

He appealed to the members that we should support this movement. There was an old Apprenticeship Act in 1967 which got amended in 2016. As per the amended Act if you give internship there is no liability of any Government body coming and asking whether particular person is working with you it is only required to inform that we have given internship in our company.

Mr. A. V. Vijayakumar said we had discussed with Logistics Skill Council and have understood that they have more students from South India region. There are around 150 students from Coimbatore and it is not possible for Coimbatore to accommodate so many students hence have requested nearby location like Tuticorin, Cochin, Chennai to accommodate. We have requested to check with the students whether they are willing to shift their location at other cities.

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He further stated that Mr. Shashidhar Hebbar had raised the question that students after internship are leaving the company. Mr. A. V. Vijayakumar shared his experience and said in his company they had given internship to the students of the private colleges who are running the logistics course at Chennai. He opined that we should support the LSC in large numbers as their requirement is six hundred plus students at different locations. The organization which can provide the internship at based at Mumbai, Chennai, New Delhi, Kolkata, Bangalore, and Hyderabad but unfortunately the students are from Coimbatore, Indore etc., we will try to accommodate the students as much as possible.

Mr. Samir J. Shah stated that all the colleges are supposed to start fall program. The Graduation program starts in June or July the fall program will start in January or February. Hence if one internship is committed there will be person from regular batch January to June and from fall batch there will be internship from July to December but due to Pandemic these colleges could not start their fall batches. He added that we reviewed the demographics of LSC after FFFAI meeting and found that there are many students who are not from Coimbatore as they have their residence at some other location, like there are two colleges namely in Rajkot & Mehsana and between these two colleges there are One hundred ten students out to which Seventy students are from Ahmedabad, Baroda, Veraval, Amreli, Mundra, Kandla etc., hence it was very easy to inform that these Seventy students can be accommodate as their internship is within 30-40 kms from their residence.

Mr. S. Ramakrishna stated the in the meeting we committed 25-30 students and if possible we will accommodate the students at other locations also. There should not be any apprehension as we are just training the students and if students are willing to stay with the organization then it would be good gesture.







Mr. Shankar Shinde thanked Mr. Samir J. Shah for giving the clarification about how we can accommodate the students in our organisations for internship. He stated that we should change our mindset regarding the apprehension that what will happen to our business. There is shortfall of skilled manpower in our industry and once we have pool of talent employees in the industry there will be stability for employing the employees within the organization.

Mr. S. Ramakrishna stated that during the meeting it has been informed to LSC to provide little knowledge of computer to student along with basic training of MS Word, MS Excel so that they will be useful to our fraternity.

Mr. R. Rajesh Kumar stated that these two colleges were inaugurated last year wherein he was invited as Chief Guest for the same. We are in contact with Prof. Ganeshan and will try to accommodate the students in Coimbatore and Tirupur. We will also try to accommodate them in the export office as there are big warehouses of Flipkart and Amazon coming up at Coimbatore.

Mr. A. V. Vijayakumar stated that we can even accommodate the students with our clients if they need people for documentation which will also help our industry.

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

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

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Mr. Dushyant Mulani stated that FFFAI had taken feedback from all locations on the following

- a) Faceless Assessment
- b) Various issues pertaining to system amendments has been flagged off by various association mainly by Mumbai, Chennai and Tuticorin have given valuable inputs for amendments also.

He stated that representation has been made to CBIC to curb the parallel manual process which are happening for amendments even for bill of lading and airway bill amendments are done online partly but balance part is still going through the manual process which needs to be worked out by the DG System also.

The slowdown of the system issue was faced across the country during weekend particularly non-receipt of the PRN files, PDF copies which was making difficult for handing over export shipments and clearance of import shipment has also been addressed.

Chairman is spearheading to address the issue of CBLR to CBIC which is top most agenda along with several other issues pertaining to Custom Brokers which are also being conceptualised and hopefully with easing out the lockdown across the country we will be able to have physical meeting to discuss the same and represent appropriately.

Mr. A. V. Vijayakumar informed that we have received following points from Tuticorin Association

- a) Gate out/Gate in process of export factory sealed containers
- b) Deletion of wrong IGST applied
- c) Bill of Entry assessed provisionally based on CAROTAR Rules 2020





- d) Issue on FAG delays and mistakes
- e) Linking of Bill of Entry

Mr. A. V. Vijayakumar informed that circular issued by the Board is very clear and implemented at all locations. He suggested to take up the issue with local Commissionerate with copy to FFFAI.

Mr. A. S. Ramasamy stated that as per circular custodian has to be integrated with MFTP platform which has not been happened and old format still exists though we get the PDF file by mail it is required to take the print out from CFS, obtain the signature of the officer and go the gate for gate in and gate out also. It is also understood that there is similar practice at Chennai also.

Mr. A. V. Vijayakumar further stated that across locations wherever the bond and bank guarantee were executed it has not been cancelled although it has to be cancelled within sixty days after verification and submission of report.

Mr. Dushyant Mulani queried whether the issue has been addressed by the importer to local Commissionerate if not kindly represent the same to the local Commissionerate with copy to FFFAI. He stated that at Mumbai importer have taken up the issue the local Commissionerate due to which some bank guarantee have been cancelled.

Mr. S. Ramakrishna informed that following issues were discussed with Director (Customs)

- 1) Issue of tariff item no. 2710 was taken up and Director (Customs) has stated that it will get implemented into the system within ten days.
- 2) In spite of uploading previous bill of entry the problem still persist in Faceless Assessment specifically at Chennai, Bangalore, JNPT and Piyala. It was informed by the Board that they are concerned about the issue and are also taking the data from the system for analysing.
- 3) There is dispute between 8471 item which needs to be put on 8538. At Most of the locations there is same occurrence hence this was also flagged.
- 4) Certificate of Origin issue where the originating place is different than the Certificate of Origin the Customs are taking narrow view that the place of location from where the cargo is coming should be taken as place of origin which is incorrect because of that large industries are facing problem.

Mr. Devendra Thakker informed when the containers are sent for gate in from ICDs some of the shipping lines are asking for seal covers. He added that at Mundra Port containers were gate in for direct port entry because of AEO and in meantime when documents are filed for good registration, the containers were randomly marked for examination due to which it was required to bring back the container to the CFS which is costly affair.

Mr. A. V. Vijayakumar stated that issue of goods registration before arrival of container is not happening online at other locations also hence we are addressing the issue to CBIC.



Mr. L. Cecil Machado stated that there is an issue while filing multiple license in single bill of entry. FAG officer are not correctly debiting the bond amount for each license due to which it is required to recall the bill of entries and reassess at PAG level. He queried whether there is any provision in the system to mention individual value of license though we are providing the individual value of the license but officers are not incorporating the same in the system

Mr. A. V. Vijayakumar responded that there is provision in the system to debit the bond, license but it is not being done hence FFFAI will be addressing the issue.

Mr. S. Ramakrishna stated that it is system error and is in process of getting rectified by NIC but it is taking time as they are not able to map the license with debit.

Mr. Vinod Sharma stated that different practices are being followed by shipping lines after sending LEO as some shipping lines, their agents, and transporter are asking for hard copy of shipping bills hence there is no uniformity. He suggested having uniform practice for sending LEO copies with trucks.

Mr. M. Satyanarayana stated that export shipping bills after filing vessel rotation number is entered but after LEO, shipping bill number is not getting displayed. He requested to take up the issue.

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He further stated that space should be increased in the system to enter the name of notified party in the system other than the exporter hence suggested taking up the issue.

Mr. Girish Narayana stated the e-gate pass copies are being received after 4-5 hours at ICD, Bangalore and shipping lines are insisting for e-gate copies, LEO copies without which they are not moving the containers. He further stated that there is an issue of license debiting and BG debiting in the system and requested FFFAI to address the same.

Mr. A. V. Vijayakumar requested to forward note on the same to FFFAI for addressing the issue.

Mr. Mannu Choudhary thanked FFFAI for addressing the issue and wanted to know the status of the same.

- i) Examination order not coming into the bill of entry particularly first copy due to which sometimes cargo also gets held up in the CFS at the time of examination because the officer states something different and during at the time of examination it is required to do something different.

Mr. Dushyant Mulani replied that examination orders are being received in PDF format. After analysing the downtime on ICEGATE on daily basis it has been observed that system is working smoothly but at the weekends particularly on Friday afternoon it is observed that system operates slowly which results in delay. FFFAI is addressing the issue and will keep the members updated.

Mr. C. Karthikeya Prabu thanked FFFAI team for addressing chapter 2710 issue and hoped that it will get resolved soon.





Mr. B. N. Rajmoghon stated that there is online adjudication for the live shipping bill or live bill of entry due to COVID – 19 Pandemic and suggested to take up the issue with Board to complete the adjudication within time frame as currently it is taking two months.

Mr. Hiren Ruparel stated that SVB cases after finalized issues are being raised by FAG Officer stating to provide SVB orders and IR reports. The investigation report are not given to the importers nowadays because the order consists of 50-100 pages. In CCR, if the case is finalised goods may be released after verification of IR report subject to following conditions. The department is issuing simple letter stating that value has been accepted. It becomes difficult to process as Customs needs the IR report to view any conditions laid down by SVB department which needs to be verified.

Mr. Dushyant Mulani supplement saying that at Mumbai they do not share the investigation report and provide only the summary stating that your value has been accepted and your IR has been sent to respective Commissioner but CCR are asking conditions to be followed in IR. He further stated that issue has been addressed in CCG meeting wherein it was stated that all the SVB orders should be uploaded on the ICES which should be viewed by the officers.

Mr. A. V. Vijayakumar requested to forward the note on the SVB order.

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Mr. Hiren Ruparel further added that CVD notification 03/2021 goods imported from Malaysia. When the Custom Brokers files the bill of entry claiming the notification, the notification is deleted while getting final copy of bill of entry. It is required to approach the Customs to impose that notification which was already claimed but has been deleted from the system. In the meantime bill of entry is already in importer queue due to which importers needs to pay the interest.

Mr. R. N. Sekar stated that for RMS Bill of Entry Officer have option to raise the query, get it clarified and issue OOC. The Officers also have option to mark the bill of entry to group or inspection. Some of the Officers are raising query and without concert are marking bill of entry to Group for assessment or marking to inspection. He said once the bill of entry is marked to Group we are not aware whether it is marked to FAG or PAG which takes about week times to bring back the bill of entry to RMS for OOC.

He further stated that at FAG location Officers are arbitrarily without consent of Custom Brokers are increasing the value or deleting the benefit of the notification for assessing and bill are coming as merit. As per the Board circular any impact on assessment has to be done by FAG officer when there is no impact it has be done by PAG Officer.

Mr. A. V. Vijayakumar replied that there is clear instruction from the Board for RMS facilitated bill entry. If the dock officer wants to re-examine then they have to obtain the permission from the DC or JC then only it can forwarded back for re-assessment etc. He further stated that regarding unilateral enhancement of value, removal of notifications and change of classification, FFFAI has already represented the issue to the Board. FFFAI is planning one more meeting with Member (Customs) and Director (Customs) to address the issues.





Mr. Kartik Pancholi stated that not only SVB issue but single bond and AD code registration done at one location should be available at all locations which was also discussed in detailed during the CCG meeting. He further stated that we should assess the representations made till date as there are many issues which were addressed but have not been resolved till date though the ratio of resolved points are higher than what have not been resolved. He stated that EOU import was represented and was also discussed with Chairman, Member (Customs) but till date all the EOU bill of entry are marked for examination by system which is totally against the import policy because by virtue of policy port Custom is restricted to do examination unless they have specific intelligence.

He suggested to take up the issue with the Board.

Mr. Ganpat Korade stated that bill of lading number can be amended automatically but if there is change in bill of lading date then it has to be routed through Officer. He further stated that in the advance filing of bill of entry MBL is not required in that case also bill of lading date cannot be modified in the system.

Mr. A. V. Vijayakumar replied that FFFAI has also represented that wherever duty is not effected, assessment is not effected it should be automatically done by Custom Brokers and not by the Officers.

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### CBLR

Mr. Samir J. Shah stated that there is case wherein Custom Broker filed shipping bill for the cargo which was restricted item and exporter had not taken relevant NOC from PGA due to which Custom stopped the consignment and penalised the Custom Broker under the Customs Act. The stand taken by the department was the Custom Broker was not able to submit the proof to the Customs that they have advice the client though the member had informed verbally to his client to obtain the NOC from the PGA. Since the member is penalised he will have problem while renewing his Custom Broker license.

He suggested that members should stop advising their client verbally and instead email should be kept on record.

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

Mr. S. Nataraja stated that lot of customers have informed that they are not getting GST refunds after three months also.

Mr. A. V. Vijayakumar replied saying to find out the error code they are getting without which we cannot take up the issue.

Mr. C. Karthikeya Prabu further stated when export is done by Merchant exporter IGST refund fraudulently taken by many exporter which was flagged by CBIC hence CBIC has issued circular no. 131/2020 which gets highlighted at the time of examination mentioning that exporter is having risk and request exporter to submit the annexure. The Officers are not updating the Custom Brokers or exporter when the shipment is being done but later when the IGST refund is processed it is being held stating GST suspend. This GST suspension is done by RMCC Customs and have specific email ID





[cus.rmcc@icegate.gov.in](mailto:cus.rmcc@icegate.gov.in). The Officers are informing to forward the examination report on this email ID by examining officer but all such things are not being done by the Officers because they are not doing such backend requirement as notified in the examination order and are keeping IGST refund pending. When the exporter approach their GST Jurisdiction officer they are informed that there is no such suspension of GST.

He opined that issue should be addressed for getting proper solutions to the exporters.

He further stated that he will send brief of the issue to FFFAI Secretariat.

Mr. Balu Govindraju stated that there is an issue of IGST import credit to importers. The importers are informing that IGST import credit is pending with the Customs as they have not got the credit in their GST IN. When approached Customs it was informed that it has been transferred to GST department. He wanted to know where to approach for the issue.

Mr. A. V. Vijayakumar stated that in import case once the IGST is paid, OOC is generated the data gets transferred to GSTIN and the importer can take the credit. He requested to forward one case for studying and then take up the issue.

Mr. A. V. Vijayakumar said if there are any issues related to GST/ Service Tax to be forwarded to FFFAI.

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

There were no points for discussion.

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

Mr. A. V. Vjayakumar stated that we have submitted the points which were received from the members to include in the agenda for the SCOPE-Shipping meeting.

Mr. Devendra Thakker informed that he is unable to register his company under SCMTR as due to Proprietorship firm the Pan Card is in his name and not in company name. He requested to take up the issue.

Mr. Tej Contractor stated that SCMTR will be good for Custom Brokers with respect to import as most of manifest information will be received 24 hours in advance which is last foreign port of call. However on exports and amendments it will be great challenge. He added that currently cut off for the vessel sailing on Saturday is Friday but in SCMTR documentation cut off will be earlier. Whether we have House Bill of Lading or Master Bill of Lading issued there will be submission of PCIN number to the carrier or to the Forwarder. The cut off for submitting the information will be different as for shipping lines who are filing bill of lading the cut off is for 48 hours, in case of House Bill of Lading data needs to be submitted 72 hours in advance hence as Custom Brokers we need to submit the data at least 96 hours in advance.

He further stated that currently no one is aware how the amendments will be done as presently for Section 149 it being manually and not into system. In case of EGM amendment we are not familiar how it has to be done.





Mr. A. V. Vijayakumar stated that FFFAI will issue advisory on SCMTR for its members.

Mr. Pradeep Kale informed that Pune Custom House Agents Association had organized meeting with local Shipping Lines, Freight Forwarders and Custodians on virtual platform.

Mr. A. V. Vijayakumar informed that all the local associations should regularly interact with the local Shipping Lines, Freight Forwarders and Custodians which will help to solve the operational issues as FFFAI can take up policy related issue.

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

Mr. A. V. Vijayakumar stated that we have submitted the points which were received from the members to include in the agenda for the SCOPE-Air meeting.

Mr. Vipin Vohra stated that whenever FFFAI send communication received from AERA regarding increase in rate at particular location that location needs to provide the inputs for the same so that it could be discussed during the stakeholders meeting. He requested Association should provide their feedback on the same.

He added that we should have cooperating among ourselves as time is coming were it is required to be united and work with each other rather than opening the offices at each location.

Agenda no.6f: **ICD related issues**

Mr. A. V. Vijayakumar informed that Nagpur Association has forwarded the issue regarding the charges and incentives which is being charged by CONCOR. He stated that we will take the issue.

Mr. Vinod Sharma informed that following point have been received from Ludhiana Association.

- i) Testing of samples outside the revenue laboratory.

The sample for testing were sent to local FSSAI laboratory at Ludhiana and report were received within day or two. As per the circular no. 46/2020 Commissioner is insisting to send the samples to Central Laboratory, New Delhi which is time consuming and also there is delay in getting the report due to which members needs to pay detention and demurrage charges. He stated that it is required to examine the circular and testing should be carried out at local FSSAI laboratory which are already authorised to test the samples.

Mr. Rajesh Verma stated that FSSAI has authorised certain NABL credit laboratory for testing the same. At Ludhiana there is regular imports of Almond, Walnuts, food supplements and other eatable items which requires NOC from the laboratory for clearance. After issuance of circular no.46/2020 local Customs have informed to forward the sample to CRCL at New Delhi. The report from the CRCL is received after four to six week and it is not possible to hold the consignments for such long time. Ludhiana Association had requested the Commissioner to accept the NOC from the FSSAI authorised NABL credit laboratory but they are showing their inability to light of the issuance of circular no.46/2020.





He requested to take up the issue.

Mr. Dushyant Mulani informed to represent locally and forward copy to FFFAI to enable us to represent the same to FSAAI.

Mr. Rajesh Verma further stated that there is issue of partial delivery as there is no examination order available for good registration and we are not able to get the partial delivery. The Shipping lines and the Custodians when there is slot break from the consignment they are considering the free period from the day when first container arrived hence there free period ended within ten days. He said the free period should be considered after arrival of all the containers and suggested taking up the issue with shipping lines.

Mr. L. Ceil Machado stated that at Tuticorin ICD bill of entry is not getting auto regularization and wanted to know how it is being done at other locations whether it is getting auto regularised or manual intervention is required.

Mr. Dushyant Mulani stated that there is similar issue at Nhava Sheva also. The issue has been addressed to DG System and hopefully we will have meeting with Directorate of System and update you.

Mr. Girish Narayana stated that there is similar issue at Bangalore also for testing of samples. He stated that representation made by Bangalore Association will be forwarded to FFFAI.

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

Mr. Shantanu Bhadkamkar stated that he would like to thank Mr. A. V. Vijayakumar, Mr. Shankar Shinde, Mr. Dushyant Mulani, Mr. S. Ramakrishna, Mr. Paresh Thakker and all FFFAI members for their support and inputs to him during his term as President of AMTOI because this was his last meeting as President of AMTOI as in September 2021 his term will be completed.

He stated that we had wonderful interaction between AMTOI, FFFAI and some other bodies also like CAI & INSA on various issues with Government department and other stakeholders. He further added that in every country there is some entity who becoming dominant and Government is making those entities dominant like Alibaba in China, Amazon, Alphabet, Apple much such entities, Courier companies. The powerful people are becoming dominate even in port sector also.

He suggested that we should take greater interest in newer business module which are evolving as during the lock down period many of the stakeholders like NVOCCs (box operator), container owner, CFSs, Consolidators etc., had phenomenal profit. He stated that we should keep our mind open, create cooperative modules and work together for which the good example is Courier Terminal of Express Courier Council.

Mr. A. V. Vijayakumar stated that there will be one more Executive Committee Meeting for this tenure. He thanked Mr. Shantanu Bhadkamkar for his contribution to the Industry as President of AMTOI. He added that you will be Advisor for FFFAI for which we will seek your advice, inputs and guidance for better action. We hope to have similar contribution from you in the future also.







Mr. Shankar Shinde thanked Mr. Shantanu Bhadkamkar for inviting FFFAI to be part of Extended Board of AMTOI. It was great learning as other stakeholders were also part of the Extended Board wherein common issues were discussed mutually which was a great initiative by AMTOI.

Mr. Dushyant Mulani stated that whether it is possible to evolve best practice between FFFAI, AMTOI and CAI which can enhance respectability for all the players who are involved between FFFAI, AMTOI and CAI.

Mr. Shantanu Bhadkamkar replied that everybody is sensitized to this requirement due to which NVOCCs have become part of AMTOI otherwise they would have become part of CSLA. There reason of becoming a part AMTOI was to come closer with freight forwarders fraternity and exporters. AMTOI is sending one letter to shipping lines every month providing the issue faced by the AMTOI members. The issues taken by AMTOI will be shared with FFFAI. The Primarily issues taken up by AMTOI are export issues wherein heavy penalty is charges and they expecting to book in advance 2-3 weeks, the position is dictatorial. There is one area where FFFAI members needs to careful is that in some cases if the Custom Brokers get noted as booking agent then lines are holding Custom Brokers liable for undelivered cargo. He stated that this is one issue where we can work together.

Mr. Pradeep Kale informed that Pune Association has submitted the document for name change from Pune Custom House Agents Associations to Pune Custom Brokers Association which was under process as due to COVID Pandemic the office of the Registrar of Societies and Charity Commissioner were close. Recently when spoke with Advocate to check the status it was understood that Trust law is going to be changed drastically whereby cancelling all the existing Trust and shifting them to another Trust law. He requested to check the same.

Mr. Sudhir Agarwal supplementing the views said that there are lot of Trust opened and are misusing the funds by taking Income Tax advantage and not doing the charity hence Government is reviewing the Trust law. He stated that if any association is having around 40-50 members and subscription is not much then they should not go for charity recognition and pay the income tax as per the income declared every year.

He further informed that FFFAI had forwarded the proforma invoices to all member and informed that members have given good response by paying the subscription. The outstanding list has been forwarded to all Presidents of Member Associations requesting them to inform their members to clear their dues at the earliest. He requested Presidents of Member Association to carry out membership drive at their location to increase the member base of FFFAI. In the last two years during the COVID Pandemic period FFFAI has done wonderful job by guiding our members and representing to various Authorities, Ministry and Forums.

Mr. Vinod Sharma thanked Mr. Sudhir Agarwal for providing the outstanding list of four location and will try to collect the dues.





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

Mr. Tej Contractor updated the house about the current batch and stated that that 2<sup>nd</sup> semester is over we will be going into the 3<sup>rd</sup> semester with completion of diploma program by September 2021.

He further informed that IIFF is going to other locations through MOUs. IIFF have signed an MOU with a school in Dehradun and in Kerela with few other negotiations ongoing.

Further he informed that IIFF will announce its next batch soon and requested support of Executive Committee Members and President of Member Association to get more participants from their location.

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

Mr. Dushyant Mulani informed members that FFFAI had received six new applications for Associate membership six 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 B)**

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## 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 we will have physical meeting. The date and venue will be intimate to members well in advance.

## Agenda no.10: **Any other matter with the permission of the Chair**

Executive Committee Member Mr. Puneet Jain suggested for extension of current tenure for one year as due to COVID Pandemic since there was very less physical interaction. Members were also of the view that with extension of one year FFFAI can organise the Biennial Convention which helps the members to upgrade their knowledge by attending the Business Session and also have good interaction with other members across the country. The B2B meeting held during the convention helps the members to increase their business network by getting new business partners.

Mr. A.V. Vijayakumar stated that in this term the entire Executive Committee has worked rigorously and there were more meetings conducted on online platform and number of representation made on behalf of members have been large. FFFAI has also achieved considerable success wherein FFFAI representation have materialised in issuance of notification, circulars by CBIC.

Mr. Shankar Shinde supplemented saying that Office Bearers could performed more during the COVID Pandemic only because of the support of the Executive Committee Members who provided the inputs/ suggestion as and when sought which helped FFFAI to make appropriate representations for representing to the Board, various Ministries and at other forums. He thanked Executive Committee Members for the support extended to FFFAI from time to time.





# Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

[ESTD. 1962]

Mr. Devendra Thakkar stated that TDS is not deducted on the Ocean freight but some of the shipping lines are not allowing to deduct the TDS on other charges also. He requested to take up the issue.

Mr. Sudhir Agarwal stated that as informed earlier we need to renovate the FFFAI office due to termite attack, accordingly we have started the renovation work. After demolishing it was observed that due to termite it is required to renovate the entire office and most of the office was affected by the termite. Hence we will be renovating the complete office. The furniture which can be used will be used. The budget to renovate the entire office will be approximately Rs.20,00,000.00 ( Rupees twenty lacs only). He requested members to kindly approve the same.

The House unanimously approved the budget of approximately twenty lacs for renovation of the FFFAI office.

## Vote of Thanks

Mr. A. V. Vijayakumar thanked members for participating in large number and providing their inputs.

Mr. Dushyant Mulani thanked Executive Committee Members to attend the online meeting. He informed that we have good attendance for the 10<sup>th</sup> 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.

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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."***

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# Federation of Freight Forwarders' Associations in India

National Apex Body of CUSTOMS BROKERS' ASSOCIATIONS IN INDIA

[ESTD. 1962]

## Annexure B

### LIST OF NEW ASSOCIATE MEMBERS - 10th E.C. Meeting

Sr No	Name of Members	Applied From	Enclosure	Attested by
1	Connect Services	Mumbai	CB License	BCBA
2	Smartlink Trans-Freight Pvt.Ltd	Mumbai	CB License	BCBA
3	Oceanic Shipping & Logistics Pvt.Ltd.	Mumbai	CB License	BCBA
4	Peak Freight Solutions Pvt.Ltd.	Mumbai	CB License	BCBA
5	Allwin Cargo	Mumbai	CB License	BCBA
6	Srico Sea Air Services Pvt.Ltd.	Chennai	CB License	CCHAA

### LIST OF NEW ALLIED MEMBERS - 10th E.C. Meeting

Sr No	Name of Members	Applied From	Enclosure	Attested by
1	Om Shipping Agencies Pvt.Ltd.	Mumbai	MTO Certificate	BCBA
2	FOX Global Pvt.Ltd	Mumbai	MTO Certificate	BCBA
3	Global Connect	Mumbai	MTO Certificate	BCBA
4	Cargoking Shipping & Logistics	Mumbai	MTO Certificate	BCBA
5	Pioner Logisys Pvt.Ltd	New Delhi	MTO Certificate	DCBA
6	Cathmen Logistics	Chennai	Consol Agent	CCHA

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