



सीमा शुल्क आयुक्त का कार्यालय .

नव सीमा शुल्क भवन, पणंबूर, मंगलूर-575010

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दिनांक/Date: #ApprovedDate#

**MINUTES OF THE 16th MEETING OF THE NODAL COMMISSIONERS OF
NATIONAL ASSESSMENT CENTRE NAC 1A (MINERAL PRODUCTS),
CHAired BY THE CHIEF COMMISSIONER OF CUSTOMS, BENGALURU
ZONE & CONVENOR NAC 1A HELD ON 15.09.2026 IN VIRTUAL MODE**

The Commissioner of Customs, Mangaluru, welcomed all participants and invited the Chief Commissioner of Customs, Bengaluru Zone, and the Convenor of NAC 1A to deliver the opening remarks.

2. The Convenor of NAC 1A welcomed all the participants and requested the Joint Commissioner of Customs, Mangaluru, to present the Agenda Points.

Agenda Point 5: Consolidated port-wise data furnished for the NAC Group 1A, June to August 2026

3.1 Dwell Time figures were presented for the months of June 2026, July 2026 & August 2026. The Convenor reviewed the consolidated Dwell Time figures for the period June to August 2026 and observed that the average Dwell Time had increased significantly to 535 hours, as against 380 hours during the preceding three-month period.

3.2 The Convenor further observed that despite the increase in the average Dwell Time, the percentage of Bills of Entry (BEs) assessed within 48 hours remained broadly unchanged at around 62 to 63%, as compared to the preceding three-month period. The Convenor observed that the increase in overall Dwell Time was largely attributable to BEs that crossed the 48-hour period, which then continued to remain pending for extended periods.

3.3. The Convenor observed that the Nodal Commissionerates had generally maintained a consistent performance in respect of Bills of Entry assessed within 48 hours. However, average dwell time increased significantly in Mumbai Import-II, Cochin, and Jamnagar, from 480 to 625 hours, 237 to 496 hours, and 527 to 841 hours, respectively. The concerned Nodal Commissionerates were

requested to examine the Bills of Entry remaining pending beyond 48 hours and review the mechanism for their monitoring and follow-up.

(Action: Nodal Commissioners – Mumbai Import-II, Cochin & Jamnagar)

4. The Convenor stated that the reasons for the increase in Dwell Time would be taken up for detailed discussion in the next meeting, based on the examination undertaken by the Nodal Commissionerates concerned.

Confirmation that First Checks are being ordered strictly as per Public Notice No. 60/2024 for goods of CTH 2710

5.1 The percentage of First Check Bills of Entry out of the total assessed Bills of Entry during the period under review was 28.24%, as against 28.29% during the preceding three-month period. The Convenor observed that the figures broadly indicated adherence to the prescribed First Check procedure under Public Notice No. 60/2024 in respect of goods falling under CTH 2710.

5.2 The Convenor observed that the purpose of analyzing the three-month consolidated figures was not merely to record the figures mechanically, but to identify significant variations from the preceding period and examine the reasons therefor. The Nodal Commissioners were accordingly advised to specifically examine any substantial variations in the next review.

(Action: All Nodal Commissioners)

Details of First Checks ordered for goods other than CTH 2710

6.1 The Convenor discussed the cases of First Check ordered for goods other than CTH 2710 and noted that five Bills of Entry had been reported during the period under review. In respect of the case reported by Cochin, wherein First Check had been ordered with the approval of the Deputy Commissioner, the Convenor directed that the applicable provisions/instructions regarding the level of approval required before ordering First Check be examined, particularly whether the earlier requirement of approval of the Additional Commissioner/Joint Commissioner continues to apply or has subsequently been modified/delegated.

(Action: All Nodal Commissioners)

6.2 In respect of the case reported by Jamnagar, relating to goods under CTH 2707 and involving a hazardous nature, it was explained that First Check was being ordered as per the prevailing practice based on DRI Circular No. 12/2013 dated 30.05.2013 and the relevant RMS Appraising Instruction, without obtaining prior approval of the Additional Commissioner/Joint Commissioner.

6.3 The Convenor observed that, where a DRI standing instruction prescribes a particular examination/testing requirement and there is no decision-making

required at the FAG level, the need for routing such Bills of Entry through FAG merely for issuance of an additional instruction may be examined. The Convenor observed that, similar to RMS-driven First Check cases, the feasibility of routing such Bills of Entry, wherever legally and procedurally permissible, for direct routing to the shed for the prescribed examination/testing may be examined.

(Action: Nodal Commissioner Jamnagar)

6.4 In respect of the cases reported by Chennai, it was noted that in two instances First Check had been requested by the importers, while another case had been picked up by RMS as a special verification case. The Convenor sought clarification on whether the concerned importer or commodity had a regular practice of requesting First Check, and also sought clarification on the level of approval obtained before ordering First Check in such cases.

6.5 In the RMS case where the instructions did not expressly use the term "First Check" but the nature of the instructions would necessarily entail examination and/or drawal of sample, the Convenor instructed that such Bills of Entry ought not to have been forwarded to FAG merely for issuance of a First Check instruction. The requisite examination/check should have been conducted at the shed, in the manner followed for RMS-driven First Check cases, and the Bill of Entry should thereafter have been forwarded to FAG for further necessary action.

(Action: Nodal Commissioner, Chennai Import II)

Discussion on BEs in which 3rd queries were raised

7.1 The Convenor discussed the descriptions of the first, second and third queries raised by the Nodal Commissionerate, Chennai. The Convenor sought clarification as to the circumstances in which a FAG would raise a query for a test report when no examination or drawal of sample had been ordered. The Nodal Commissionerate, Chennai Import-II, clarified that the first query seeking the test report was raised when the Bill of Entry was returned to FAG from the shed.

7.2 In one of the cases discussed, it was clarified that the Bill of Entry had already undergone examination/testing and had thereafter been returned to FAG without the test report being uploaded. The importer requested provisional assessment on the ground that the test report was not ready; however, provisional assessment was stated to be not permissible under the applicable Public Notice. The Convenor observed that the case was therefore distinguishable from a case involving merely a request for a previous test report/PTR, as the goods had already been tested.

7.3 The Convenor observed that the cases involving third queries should be examined by looking at the sequence of the first, second and third queries and the circumstances in which each query was raised. The Convenor specifically

examined the Mangaluru and Jamnagar cases as examples of requirements that, in retrospect, could have been consolidated into the first query, with the caveat that genuinely new issues arising from subsequent documents can justify a later query. The Convenor directed that in the future, the relevant data and case-wise details be compiled and furnished at least one week before the next scheduled meeting so that the cases can be examined properly in advance.

7.4 In respect of the cases discussed from Mangaluru and Jamnagar, the Convenor observed that, in certain instances, the subject matter of the second query could have been incorporated in the first query itself. The Nodal Commissionerates were advised to avoid piecemeal or sequential queries wherever the requirement could reasonably have been identified at the first instance. It was clarified that this does not preclude a subsequent query where a genuinely new issue emerges from documents or information furnished in response to an earlier query.

(Action: All Nodal Commissionerates)

Details of Bills of Entry pushed to PAG — discussion on the reasons/ circumstances for pushing (49 BEs)

8.1. The Convenor discussed the Bills of Entry pushed to PAG and observed that, while the fact of push-back is already known, the report should specifically indicate the circumstances which compelled the push-back and, wherever applicable, why the Bill of Entry could not have been pushed at an earlier stage.

8.2. In respect of Sl. No. 10 pertaining to Bhubaneswar, wherein several Bills of Entry remained pending for a considerable period before being pushed to PAG, the Convenor advised that the report should clearly state the specific reasons for the delay in pushing the Bills of Entry at an earlier stage. In cases involving prolonged DRI investigations, the report should indicate why the Bills of Entry could not have been pushed earlier, such as the Bills of Entry not being visible/available for action, pendency of investigation, or any other specific legal or procedural impediment. Relevant BE details have been mentioned below for reference:

10	INPRT1 (Bhubaneswar)	27238.6 dt. 18.06.2025	Aromatic Solvent	Sree Chemtech	BE more than one year old; ordered for first check. Test report showed the item was High Speed Diesel and not Aromatic Solvent as declared. Adjudicated vide OIO No. MCH/ADC/ZDC/40/20 26-27 dt. 21.07.2026; pushed to PAG at request of shed officer for
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(Action: Nodal Commissioner, Bhubaneswar)

8.3. In respect of Sl. Nos. 11 and 14 pertaining to Mumbai, it was noted that the quantity available in one consignment was below the quantity required for testing as per the CRCL directions. The Convenor sought clarification on the basis of the restriction and noted that, while the First Check requirement under Public Notice No. 60/2024 had been followed, the practical issue of being unable to test very small quantities requires examination. The Convenor directed that an appropriate course of action be considered for similar cases in future so that consignments of such quantity are not repeatedly subjected to a testing process which cannot practically be undertaken. Relevant BE details have been mentioned below for reference:

1 1	INBOM1 (Mumbai)	8048104 dt. 13.03.20 26	Tetramer (Sample) 1.5 Liter	Newzeal Chem India LLP	The importer requested to assess the BE without testing as quantity less for testing purpose.
1 4	INBOM1 (Mumbai)	9414029 dt. 21.05.20 26	Divinol Lithogreas e	SVS Knit Paper	The importer requested to assess the bill without testing.

(Action: Nodal Commissioner, Mumbai Import-II)

8.4. In respect of Sl. Nos. 24, 25, 27 and 30 pertaining to Chennai, the Convenor expressed serious concern regarding instances where, despite directions for testing, the test report was not uploaded and, as reported by Chennai, in some cases the sample itself had not been drawn. The Convenor observed that such non-compliance with examination/testing directions was a serious matter and stated that the issue would be brought to the notice of the jurisdictional Chief Commissioner for examination and necessary corrective action. Relevant BE details have been mentioned below for reference:

2 4	INMAA1 (Chennai)	2487319 dt. 13.07.20 26	Vacuum Pump Oil	M/s. Lakshmi Metal India	First-check BE returned after examination, dwell time 502 hrs; sample was not drawn as ordered in terms of PN 60/2024. Pushed to PAG to save dwell time and for further examination.
2	INMAA1	2718260 dt.	T-9	M/s. CARL Bechem Lubricants	First-check BE returned to FAG, dwell time 97 hrs; importer is AEO Tier-2 status holder. Sample not

5	(Chennai)	24.07.2026	(BaseOil)	India Pvt. Ltd.	drawn as per examination report; certificate of analysis uploaded does not contain parameters required under PN 60/2024. Pushed to PAG to save dwell time.
27	INMAA1 (Chennai)	2901629 dt. 03.03.2026	Hydrocarb on Oils (CTH 2710)	M/s. Kyodo Yushi India Pvt. Ltd.	First check ordered for testing of hydrocarbon oils in terms of PN 60/2024; importer had no prior test report. Test report not uploaded despite three queries. Pushed to PAG to avoid further increase in dwell time.
30	INMAA1 (Chennai)	2633029 dt. 20.07.2026	Goods under HSN 2710	M/s. Sri Venkateswara Lubricants	First check ordered in terms of PN 60/2024; BE returned from shed without test report. Despite two queries, importer did not upload valid Petroleum Test Report (PTR) mandatory under PN 60/2024. Pushed to PAG to avoid further increase in dwell time.

(Action: Nodal Commissioner, Chennai Import II)

8.5. During discussion of Sl. No. 31 pertaining to Mangaluru, the Convenor observed that, where a Bill of Entry is required to be pushed to PAG under the exceptional provision, the report should clearly identify the applicable provision and the specific exceptional circumstances. It was observed that the case should not be described as falling under the specified categories where it does not actually fall under any of them. In the case under discussion, only two queries had been raised. The Convenor directed that, wherever applicable, the available three-query process should be exhausted before push-back and that the report should be concise and accurately reflect the facts and the provision under which the action has been taken. Relevant BE details have been mentioned below for reference:

3	INNML1	2597396 dt.	Steam Coal	Jayasw al Neco	Importer wrongly mentioned UQC as KG instead of MT. Despite second query, importer did not agree to amend UQC or consent to
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1	(Mangaluru)	18.07.2026	(CTH 27011920)	Industries	provisional assessment for bulk cargo. Vessel arriving shortly; case treated as exceptional under Para 5.3.2(a)/(b)/(c) of CBIC Instruction No. 09/2020 dt. 05.06.2020 and pushed to PAG.
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(Action: Nodal Commissioner, Mangaluru)

8.6. In respect of Sl. Nos. 35 and 36 pertaining to Mangaluru, where the Bills of Entry had already been granted Out of Charge and were subsequently returned for re-assessment, the Convenor noted that such cases were required to be dealt with at the port level in accordance with the applicable Board instructions, rather than being sent to FAG where the subsequent amendment/re-assessment did not affect assessment. The Nodal Commissionerate was advised to accurately cite the applicable instruction and avoid inclusion of irrelevant details such as the age of the Bill of Entry. Relevant BE details have been mentioned below for reference:

35	INNML1 (Mangaluru)	3365167 dt. 19.07.2025	Murban Crude Oil (CTH 27091100)	BPCL	BEs marked/allotted to FAG after amendment; about 11 months elapsed. Processing in FAG would increase dwell time; pushed to PAG.
36	INNML1 (Mangaluru)	3494895 dt. 25.07.2025	Crude Oil	BPCL	BEs marked/allotted to FAG after amendment; about 11 months elapsed. Processing in FAG would increase dwell time; pushed to PAG.

(Action: Nodal Commissioner, Mangaluru)

8.7. In respect of Sl. No. 38 pertaining to Cochin, it was explained that the test report uploaded in e-Sanchit could not be opened due to an error message. The Convenor advised that, whenever such a technical issue is encountered for the first time, a ticket should be raised immediately with DG Systems and the matter referred for examination to determine whether the issue is attributable to a system fault or a temporary technical glitch. **The Bill of Entry should not have been pushed to PAG solely on account of an unexamined technical issue.** As this was stated to be the first occurrence of the error, the Convenor directed that the matter be referred to DG Systems, even though the Bill of Entry had already been pushed back, to ascertain whether the issue was due to a system fault/temporary glitch or a recurrence of an earlier issue. Relevant BE details have been mentioned below for reference:

3 8	INCOK1 (Cochin)	2455586 / 11.07.20 26	Fuel Oil CTI - 2710 1990	M/s Marishma Private Limited	Complete test report was not available in ICES and the test report uploaded in e-sanchit could not be opened. Hence bill of entry was pushed back to PAG to avoid further delay in assessment.
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(Action: Nodal Commissioner, Cochin)

8.8. In respect of Sl. Nos. 43, 44, 47 and 48 pertaining to Jamnagar, the Convenor observed that, where the test report does not establish that the goods are prohibited/restricted or otherwise liable to confiscation, the mere fact that the importer does not agree with the departmental view should not, by itself, constitute a ground for pushing the Bill of Entry to FAG. The normal assessment/adjudication process should be followed at the FAG level in such cases. **Push-back may be considered where the test report reveals a contravention requiring action at the PAG level, including circumstances rendering the goods liable to confiscation.** Relevant BE details have been mentioned below for reference:

4 3	INVAD1 (Jamnagar)	9422205 dt. 22.05.20 26 (X- Bond E: E)	Solvent (CTH 2707 5000)	Chemtrade Global Import	Test report of Warehousing BE not available. Pushed to PAG under Para 5.3.2(C) of Instruction No. 09/2020 dt. 05.06.2020
4 4	INVAD1 (Jamnagar)	2396325 dt. 09.07.20 26	Various items under CTH 2710, 3413, 3102, 3811, 3824, 9403, 6912, 3910, 8512 etc.	Kyte Internation al	Sample of only 1 item was drawn out of 28 different items under CTH 2710; no examination report on applicability of LMPC Act/RE44 condition and DV Fair furnished. Dwell time crossed 362 hrs; pushed to PAG under Para 5.3.1 VII(C) of Instruction No. 09/2020 dt. 05.06.2020.
4 7	INVAD1 (Jamnagar)	2507557 dt. 14.07.20 26	Base Oil (CTH 27101971)	Exxonmobil Lubricant, Pvt. Ltd.	Importer did not give consent for change in CTH. Pushed to PAG for re-testing/other action under Para 5.3.2(c) of Instruction

					No. 09/2020 dt. 05.06.2020.
4 8	INVAD1 (Jamnagar)	3179568 dt. 17.08.20 26 (X- BondB E)	Base Oil (CTH 27101971)	Castrol India Ltd.	Non-availability of test report of parent Warehousing BE. Pushed to PAG under Para 5.3.2(c) of Instruction No. 09/2020 dt. 05.06.2020.

(Action: Nodal Commissioner, Jamnagar)

8.9. The Convenor directed that, for the next meeting, case-wise details of (i) every First Check Bill of Entry other than goods falling under CTH 2710, (ii) every Bill of Entry involving a third query, and (iii) every Bill of Entry pushed back to PAG, be compiled and furnished at least one week prior to the scheduled meeting for detailed examination.

(Action: All Nodal Commissioners)

9. Agenda Point 1: Compliance Report in respect of:

- **Day-wise monitoring of pendency of BEs**
- **Weekly monitoring of Standard Examination Orders**
- **Fortnightly Sectoral Meeting**
- **Monthly Analysis of First Checks**
- **CCVs to be done by ports and not by FAGs: Adherence to Para 2.2.(iv) of Circular 45/2020 dated 12.10.2020.**

9.1 All Nodal Commissionerates had reported compliance with the directions relating to day-wise monitoring of pendency of Bills of Entry, weekly monitoring of Standard Examination Orders, Fortnightly Sectoral Meetings, monthly analysis of First Checks and CCVs being undertaken by the ports in terms of Para 2.2(iv) of Circular No. 45/2020-Customs dated 12.10.2020. **During the meeting, however, the Convenor sought specific confirmation regarding the conduct of Fortnightly Sectoral Meetings.**

9.2. The Nodal Commissionerates of Mumbai, Visakhapatnam, Cochin and Mangaluru confirmed that Fortnightly Sectoral Meetings are being conducted regularly.

9.3. The Nodal Commissionerates of Bhubaneswar and Chennai confirmed that separate Fortnightly Sectoral Meetings are not being conducted. The Nodal Commissionerates were advised to furnish the correct position and, if they consider that separate sectoral meetings are not necessary where the relevant issues are already covered in CCFC/PTFC meetings or where there are no sectoral associations, to refer the matter for appropriate clarification.

9.4. The Nodal Commissionerate of Jamnagar stated that PTFC and NAC-1A

Sectoral Meetings are being conducted jointly. The Convenor observed that such an arrangement may be considered, provided that the Minutes clearly reflect that the NAC-1A sectoral matters were also taken up and independently examined. The Nodal Commissioner, Mangaluru, as the Mini-Secretariat for NAC-1A, was requested to obtain the minutes of such jointly conducted meetings regularly and ensure they are available for review.

(Action: Nodal Commissioner, Mangaluru – Mini-Secretariat for NAC-1A)

9.5. The Convenor further directed that in the future, the dates of the Fortnightly Sectoral Meetings conducted by each Nodal Commissionerate should be maintained and furnished along with the relevant Minutes, rather than relying only on a general confirmation that the meetings have been conducted.

(Action: All Nodal Commissioners)

**10. Agenda Point 2: Report from the Nodal Commissioner, Mangaluru
(Agenda Points 4 & 5 of the NAC 1A Meeting dt 29.06.2026)**

Issue	Compliance reported
2.1 ICES do not reflect the time taken for the First Decision correctly. DG (Systems) has made the changes; the Convenor directed that this report forms a KPI from the next Meeting.	<u>The issue is still persisting.</u> The matter has been taken up with DG Systems.
2.2 The System does not flag or generate standardised instructions if the RMS does not process a Bill of Entry within 2 hours.	Advisory No. 21/2026 dated 28.04.2026 issued by DG (Systems): the System has been modified to display CTH-wise CCR instructions in such cases. <u>However, the core issue of non-generation still remains.</u> The matter has been taken up with DG Systems.
2.3 Request for excluding the re-assessment period from the computation of the Assessment Dwell Time of the FAGs or segregating the Assessment Dwell Time into two distinct categories so as to appropriately reflect the time attributable to re-assessment.	Matter has been taken up with DG Systems.
2.4 Break-up of First check into those ordered by Officers and those by RMS.	Matter has been taken up with DG Systems.

10.1. It was further informed that letters had been issued and four reminders had been sent in respect of the matters, but no written response had been received from DG Systems as on the date of the meeting. The issues had also been followed up verbally with the concerned officers.

10.2 The Convenor reviewed the compliance reported by the Nodal Commissionerate, Mangaluru in respect of the system-related issues raised in the earlier meeting. **It was noted that four separate issues were being pursued with DG Systems, namely:** (i) incorrect/inaccessible reporting of First Decision time, (ii) non-generation of standardised instructions where RMS does not process a Bill of Entry within two hours, (iii) exclusion/segregation of the re-assessment period from Assessment Dwell Time, and (iv) break-up of First Check cases into those ordered by officers and those generated by RMS.

10.3 The Convenor directed that the correspondence relating to all four issues be consolidated, wherever necessary, so that all four references are clearly reflected in one place and can be pursued with DG Systems.

(Action: Nodal Commissioner, Mangaluru – Mini-Secretariat for NAC-1A)

11. Agenda Point 3 - Assessment-related training modules on the Top 20 commodities

Sl. No.	Commodity	Nodal Commissionerates by which identified
1	Coal (Coking Coal / Steam Coal)	Chennai (Import-II), Visakhapatnam, Bhubaneswar (Preventive), Jamnagar (Preventive), Cochin
2	Base Oil	Mumbai (Import-II), Visakhapatnam, Bhubaneswar (Preventive), Jamnagar (Preventive)
3	Fuel Oil	Chennai (Import-II), Mumbai (Import-II), Jamnagar (Preventive)
4	Butane	Mangaluru, Jamnagar (Preventive)
5	Crude Palm Oil	Mangaluru
6	Crude Oil	Jamnagar (Preventive)
7	Lubricating Oil	Jamnagar (Preventive)
8	Grease	Jamnagar (Preventive)
9	Propane	Jamnagar (Preventive)
10	Sludge Oil / Waste Oil	Cochin

11.1. The Mini-Secretariat presented the list of ten distinct commodities identified after eliminating overlaps. The Convenor directed that only one Nodal Commissionerate should be assigned ownership of each commodity, without

duplication. Other Nodal Commissionerates may provide joint assistance where required; however, one Nodal Commissionerate should be responsible for preparing the training module.

11.2. For the present, the Convenor directed that the exercise be restricted to seven commodities, with one commodity assigned to each of the seven Nodal Commissionerates. After finalizing the ownership, the concerned Nodal Commissionerates should furnish/compile the relevant assessment-related training modules for the commodities assigned to them. Further commodities may be taken up after the first set of modules has been reviewed and finalized.

(Action: Nodal Commissioner, Mangaluru – Mini-Secretariat for NAC-1A)

12. Discussion on speaking orders, anonymity, grievances and sectoral meetings:

12.1. While reviewing the relevant KPI responses, the Convenor observed that some replies had been furnished in an incomplete or ambiguous manner, including instances where “no reply” or “not applicable” had been reported despite the intended response being that no such instance had been noticed. Specifically, Visakhapatnam and Mangaluru had shown “no reply”. Mangaluru clarified that this was a clerical error and should have read “no instance”. Mumbai had shown “not applicable” for unauthorized disclosure, which the Convenor specifically rejected because “not applicable” has a different meaning.

12.2 The Convenor advised that the responses should clearly state the factual position, even where the answer is “Nil” or “No such instance noticed”, and should not be left blank or marked “Not Applicable” unless the parameter is genuinely inapplicable. The Convenor further directed that proper replies be furnished even where the response was simply “no such instance”. It was noted that no speaking orders had been issued during the period under review.

12.3 The Convenor emphasised that the KPI data should be prepared carefully and sufficiently in advance, as the purpose of the meeting is to analyse the figures and underlying issues rather than merely reproduce the responses furnished by the formations.

(Action: All Nodal Commissioners)

13. NAC Performance Matrix — 16 Key Performance Indicators

13.1. While discussing the 16 Key Performance Indicators, the Convenor sought clarification as to how the Nodal Commissionerates were furnishing responses in

respect of "First Decision within three working hours" when the issue regarding access to the correct system-generated figures remained unresolved.

13.2. The Nodal Commissionerate, Cochin explained that the figures furnished in respect of First Decision had been compiled from personal records maintained by the concerned officers and were not retrieved from the system. The Convenor directed that responses should not be presented as system-generated figures when they are based on personal records.

13.3. The Nodal Commissionerate, Mangaluru (Mini-Secretariat) was requested to obtain revised data in respect of "First Decision within three working hours" and ensure that the factual position regarding availability of the system-generated report is correctly reflected.

(Action: Nodal Commissioner, Mangaluru – Mini-Secretariat for NAC-1A)

13.4. In respect of "Number of Bills of Entry pending beyond 48 hours, with remedial action", the Convenor sought clarification regarding the mechanism through which the figures reported by Mangaluru and Cochin were being generated. It was clarified that the figures were being compiled from personal records maintained by the concerned assessing/appraising officers, as the corresponding data could not be retrieved from the system.

13.5. The Convenor observed that there was no system-based mechanism to conclusively establish that every Bill of Entry pending beyond 48 hours was pending only on account of First Check, non-receipt of test reports or similar reasons. It was therefore advised that the response should not state an unsubstantiated position. Instead, the reporting may identify the major factors observed to be associated with prolonged pendency, such as First Check, delay in drawal of samples, delay/non-receipt or inadequacy of test reports and consequent push-back, wherever supported by available records.

13.6. The Convenor also discussed standardization of frequent queries and their sharing with Systems with the Nodal Commissionerates of Mumbai and Jamnagar. The Nodal Commissionerates indicated that no such standardization had been undertaken/shared with Systems. The Convenor, however, observed that Mumbai's response required further examination, given the comparatively high number of first and second queries reported by the Commissionerate.

13.7. The Nodal Commissionerate, Mumbai was accordingly requested to examine whether recurring queries in respect of NAC-1A commodities could be standardized and, in consultation with the Nodal Commissionerate, Mangaluru, ascertain whether the standard queries identified earlier had been incorporated into the System or otherwise taken up with DG Systems. The use of "Not Applicable" should be avoided where the parameter is capable of application merely because no particular instance was noticed during the review period.

(Action: Nodal Commissioner, Mumbai Import-II)**14. National Convenors' Meeting: - Report regarding DRI Instructions in line with Public Notice: 60/2024.**

14.1. The Convenor discussed the pending report relating to DRI alerts/instructions requiring any amendment or modification to Public Notice No. 60/2024. It was recalled that the Board had assigned Chennai Import-II to furnish the requisite inputs. The Convenor clarified that the entire NAC 1A assessment framework since December 2024 has been built around the Chennai Public Notice, which applies to CTH 2710, and even within 2710 only certain circumstances trigger First Check. Therefore, the said Public Notice can be modified only on receipt of fresh DRI inputs.

14.2. The Convenor explained that the purpose of the exercise was to ascertain whether any fresh DRI alerts relating to Chapter 27 required modification of the existing Public Notice, particularly in view of the assessment/testing framework prescribed therein. **Chennai Import-II was requested to obtain the requisite inputs by coordinating with the concerned DRI formation, if required, and furnish the report within one week.**

(Action: Nodal Commissioner, Chennai Import II)

15. CRCL Test Reports - Uploading in Prescribed Module and Accessibility to Stakeholders - Reply from Chennai Commissionerate

15.1. The Convenor noted that the reply from Chennai had been received only on the date of the meeting and therefore could not be incorporated in the presentation. The Convenor directed that the reply be examined in detail before any reference is made to the Board.

15.2. The Convenor recalled that the exercise was intended to include a representative study of First Check cases involving CRCL test reports over a period of one month, along with the workflow followed in such cases and categorisation of the cases into the relevant classes, so that the actual operational issues could be clearly identified.

15.3. Suggestions of automated intimation to the importer/trade when the CRCL test is completed and making the test report available/printable through the Bill of Entry so that it could be used as a previous test report in subsequent consignments were raised in the meeting. The Convenor suggested that, after examining the data, a reference may be prepared for the Board's consideration regarding strict adherence to CRCL directions for uploading test reports in the prescribed CRCL module. It was observed that proper uploading of the test report in the module would obviate the need for repeated queries by the shed/port officer or FAG officer for submission of the test report.

15.4. The Convenor further directed that the existing CRCL instructions be examined to ascertain whether, once the test report is uploaded in the prescribed module, the report is accessible to all concerned stakeholders, including the trade, and whether any separate mechanism for furnishing copies/intimation to importers is actually required. The differing practices reportedly being followed by different CRCL formations should also be examined before making any specific recommendation to the Board.

15.5. The requisite data and examination report shall be furnished to the Chief Commissioner's Office/Mini-Secretariat within a fortnight for preparation of the reference to the Board.

(Action: Nodal Commissioner, Mangaluru – Mini-Secretariat for NAC-1A)

16. The Convenor directed that the requisite reports/data from all Nodal Commissionerates **be collected on a monthly basis, rather than only immediately before the scheduled meeting. The report/data for September 2026 shall be furnished by the first week of October 2026** and, thereafter, the data for each succeeding month shall be furnished by the first week/appropriate date of the following month, so that the same can be analyzed in advance of the next meeting.

(Action: All Nodal Commissionerates)

17. The Convenor advised that specific focus in the subsequent reviews will continue to be placed on: (i) third queries, (ii) First Check cases, particularly First Check cases involving goods other than CTH 2710, and (iii) Bills of Entry pushed back to PAG. The Convenor again requested the Nodal Commissionerate, Mangaluru, to examine the extant provisions regarding the requirement of prior approval of the Additional Commissioner/Joint Commissioner before ordering First Check and ascertain whether the earlier requirement continues to apply or has been delegated/modified.

17.2 Convenor specifically directed that henceforth the data should be available a week before the scheduled meeting and that the next meeting would not be fixed until the Convenor was satisfied that the correct data had been received. It was also clarified that the Mini-Secretariat was expected to act as the first checking point if anything in the data did not make sense.

(Action: Nodal Commissioner, Mangaluru – Mini-Secretariat for NAC-1A)

17.3 The Convenor directed all Commissionerates to provide the data for the month of September along the above lines and, based on the discussions above, by the first week of October, after which a meeting can be held for the month of September to check progress. The subsequent months' data shall be provided

before the 10th of the succeeding month to the mini-secretariat. The data should also include the minutes of the fortnightly sectoral meeting to ensure compliance.

(Action: All Nodal Commissionerates)

Any Other Point with the Permission of the Chair

18. No additional agenda point was raised by the Nodal Commissionerates. The Convenor concluded the meeting by appreciating the officers' contributions through the various reports, replies to queries, and discussions during the meeting, and thanked all Members for their active participation, inputs, and recommendations.

19. The Convenor requested that the ***presence of the Commissioners of the Nodal Commissionerates may be ensured in future meetings to the extent possible***, as their participation would facilitate value addition to the deliberations and enable more effective consideration of issues requiring decisions or clarification at the Commissioner level.

This is issued with the approval of the Convenor, NAC-1A.

Digitally signed by
ABILASH K SREENIVASAN
Date: 28-09-2025
14:16:41

**COMMISSIONER
MANGALURU CUSTOMS**

To

1. The Nodal Pr. Commissioner/ Commissioner of Customs (NAC-1A), Mumbai Imports-II/ Bhubaneswar (Preventive)/ Vishakhapatnam/ Chennai Imports-II/ Cochin/ Jamnagar (Preventive)/ Mangaluru.
2. Principal Additional Director General, NCTC-Cargo, DGARM, Mumbai

Copy for information to:

The Pr. Chief Commissioner/ Chief Commissioner, Mumbai Customs Zone- I/ Ahmedabad Customs Zone/, Chennai Customs Zone/ Bhubaneswar Zone/Vishakhapatnam Zone/Thiruvananthapuram Zone

LIST OF OFFICERS WHO ATTENDED THE MEETING

1. Shri Naresh N, Commissioner of Customs, Chennai Import-II

2. Shri Abilash K. Sreenivasan, Commissioner of Customs, Mangaluru
3. Shri Amit Kumar Singh, Additional Commissioner of Customs, Jamnagar
4. Shri Akash Chougule, Additional Commissioner of Customs, Mangaluru
5. Shri Amaresh P., Additional Commissioner, Visakhapatnam
6. Shri. Parry Vallal, Additional Commissioner, Bhubaneswar (Paradeep)
7. Ms Rani C R., Additional Commissioner of Customs, Cochin
8. Shri Harikrishnan D., Joint Commissioner of Customs, Mangaluru
9. Shri Jai Waghmare, Joint Commissioner, Mumbai Import-II
10. Dr Saranya, Joint Commissioner of Customs, Chennai Import-II
11. Shri. Mohandas V V, Assistant Commissioner, Mangaluru
12. Shri I D Solanki, Assistant Commissioner, Jamnagar
13. Shri T V Suresh, Assistant Commissioner, Chennai Import-II
14. Shri Y V Vasantha Lakshmi, Assistant Commissioner, Visakhapatnam
15. Shri Prafull Kumar Dubey, Appraiser of Customs, Mangaluru
16. Shri J Dora, Superintendent of Customs, Mangaluru
17. Shri Rakesh Jha, Appraiser of Customs, Jamnagar
18. Shri Ajay Sinohi, AO, Mumbai Import-II
19. Shri G Manohar Naidu, Appraiser of Customs, Visakhapatnam
20. Shri Ajay Sirohi, Appraiser of Customs, Mumbai Import-II
21. Shri Rahul Gupta, Appraiser of Customs, Chennai Import-II