



**GCCI**  
**GUJARAT CHAMBER OF**  
**COMMERCE & INDUSTRY**

(SINCE 1949)

(ગુજરાત વેપારી મહામંડળ)

2<sup>nd</sup> July, 2019

GCCI/DYSGR/FT/2019-20/7647

**The Deputy Commissioner of Customs (DE)**  
Customs House  
Mundra Port  
Mundra.

Respected Sir,

**Sub: Providing benefit of waiver from scanning and re-examination process to compliant non-AEO exporters**

Greetings from Gujarat Chamber of Commerce and Industry.

At the outset, we appreciate and applaud the introduction of self-sealing of cargo and self-certification of goods exported from Mundra Port. Such initiatives are in line with the government's efforts to improve Ease of Doing Business, as they make the process of exports simpler, faster and more efficient.

Sir, as part of this initiative, the exporters having "Authorised Economic Operator" status have been exempted from scanning and re-examination of their self-sealed cargo exported through your port. However, it has come to our notice that many genuine exporters who are unable to obtain the AEO status immediately due to some technical reasons and therefore they are unable to avail the benefit of the exemption even though they have a 100% compliant track record. For e.g. in the case of newly established companies, criteria such as net worth may be difficult to achieve as they are in the initial stages of operation.

We are of the opinion that the spirit and objective of the AEO scheme is to encourage exporters to be self-compliant, promote self-certification and self-sealing amongst the exporters and ultimately give the benefit of faster process to such compliant exporters. While we do not in any way recommend leniency in laws for non-compliant exporters, it is necessary at the same time that the genuine exporters are not subjected to the burden of complex and time-consuming procedures. It is with this objective in mind that we suggest that the benefit of this scheme should be made available also to the new exporters with a good compliant track record. We are enclosing herewith the details of one such case of Satyesh BrineChem Pvt. Ltd. for your perusal.

We look forward to your positive intervention in the above matter, in the larger interest of exporters.

With Regards,

Sincerely,

**Durgesh Buch**  
**President**

**Encl: As above**



Gujarat Chamber of Commerce & Industry <gccci@gujaratchamber.org>

**Chemexcil / S8546 //Request to represent trouble of ICEGATE on Bromine Exports // IEC No.0816903115 // Satyesh Brinechem pvt ltd**

1 message

Manish Rajwani <manish.rajwani@satyeshbrine.com>

Mon, Jul 1, 2019 at 1:25 PM

To: roahmedabad@chemexcil.gov.in, "Deepak Gupta, Dy Director, Chemexcil" <deepak.gupta@chemexcil.gov.in>, ed@chemexcil.gov.in

Cc: Aditi Shah <secretarial@sandesh.com>, parizad.khokhri@satyeshbrine.com, vm@satyeshbrine.com, Dhaval Pandya <dhaval.pandya@sandesh.com>, reshikeshan@satyeshbrine.com, Sahayog Bhalodiya <sahayog.bhalodiya@satyeshbrine.com>, parth.shah@satyeshbrine.com, commr-cusmundra@nic.in, president@gujaratchamber.org, foreigntrade@gujaratchamber.org, sg@gujaratchamber.org, ceo@gujaratchamber.org, kaushik.joshi@adani.com, cuscco@gmail.com, Sumanta Rana <sumanta.rana@satyeshbrine.com>, umesh.tanwar@sandesh.com

Dear Sir,

Apropos the captioned subject, we, M/s. Satyesh Brinechem Private Limited, Ahmedabad, have set up a green field manufacturing facility for the production of Industrial Salt and Liquid Bromine at Greater Rann of Kutch, Near Hajipir, Taluka Bhuj, District Kutch-370605, (Gujarat).

The multiple applications of Liquid Bromine have led to a remarkable growth in the global market. In regard to this, a part of the Bromine will be sold in the domestic market and majority will be exported.

We have recently commenced the production of Liquid Bromine and majority of the produce is exported. To avoid the delay in the customs clearances for serving our International Clients on a timely and efficient basis, we have applied to the Deputy Commissioner (DE/RMS), Officer of the Principal Commissioner of Customs, requesting them for waiver off scanning and re-examination of our self-sealing cargo – Liquid Bromine exported in our own SOC ISO Tanks through Mundra Port on account of its precarious quality. We further inform that repeated or prolonged exposure of Bromine may cause acute and chronic health effects.

In response to our request letter, we were directed by the Deputy Commissioner to produce the "Authorised Economic Operator (AEO) Status", vide their letter VIII/48-15/DE/RMS/Misc./18-19/8562 dated 25th February, 2019. In terms of their direction, we had applied for AEO status, however, the same was rejected on account of the negative net worth in Financial Year 2016-17, the Company being in the initial years of operation. To this we inform that we are positive that our Company's Net worth will be positive for the next year and accordingly, we will be able to apply for the AEO status in next year.

We have also presented the aforesaid matter with Additional Director General (RMCC) ICEGATE, Mumbai, as the Mundra Port lies under their jurisdiction, but with resentment we hereby inform that there is no response from their good office, till date.

In this regard, we humbly request your good office to look into the matter and provide us your valuable support in representing our request with the respective authorities for availing the waiver off the requirement of scanning and re-examination of SOC ISO Tank Containers to avoid the delay in the customs clearances and thereby promoting the foreign export. We will be obliged to receive your support in this regard.

Thanking you in anticipation of your prompt positive action.

Manish U Rajwani

Mobile No. +91 7567032828

Satyesh BrineChem Private Ltd.

"Sandesh Bhavan", 3rd Floor,

Lad society Road, B/h. Vastrapur Gam,

P.O. Bodakdev, Ahmedabad - 380 054




**SATYESH BRINECHEM**  
Private Limited

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**4 attachments**

 **mundra customs.pdf**  
83K

 **req. letter-Inward for Custom.pdf**  
961K

 **sbpl02160319.pdf**  
233K

 **SBPL03.pdf**  
253K



सीमा शुल्क आयुक्त का कार्यालय

OFFICE OF THE PRINCIPAL COMMISSIONER OF CUSTOMS

सीमा शुल्क सदन, मुंद्रा कच्छ, (गुजरात-370421)

CUSTOMS HOUSE, MUNDRA (KUTCH), GUJARAT - 370421

Phone No. 02838-271463. फैक्स/Fax: 02838-271169/271475

F.No.: VIII/48-15/DE/RMS/Misc/18-19

Date:-25.02.2019

To,  
M/s. Satyesh Brine Chem Pvt. Ltd.  
Sandesh Bhavan, Lad Society Road,  
B/h. Vastrapur Gam, Bodakdev,  
Ahmedabad - 380054

Gentlemen,

Subject : request for waiver of scanning and re-examination of  
self - sealing cargo, Liquid Bromine, exported in SOC ISO  
tank through Mundra Port - reg

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Please refer to your letter SBPL/01/18-19 dated 06.02.2019 on the above  
cited subject.

In this connection, it is to inform that, your above mentioned letter was  
perused by the Deputy Commissioner (DE), Mundra and it has been directed to  
know your Authorized Economic Operator (AEO) status.

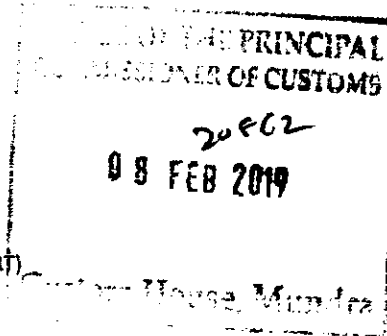
Hence, if you are holding AEO status, submit the same along with its  
supporting documents.

Yours sincerely,

Superintendent (DE)  
Customs House, Mundra



**SATYESH BRINECHEM**  
Private Limited



SBPL/01/18-19

Date : 06/02/2019

To,  
The Deputy Commissioner of Customs (DE/EDI/EXPORT),  
Customs House  
Mundra Port  
Mundra.

Ref. : Exemption of scanning and re-examination of our self-sealing cargo –Liquid Bromine  
Exported in our SOC ISO Tank

Sub. : Request for waiver of scanning and re-examination of our self – sealing cargo,  
Liquid Bromine exported in our own SOC ISO Tank through Mundra port.

Respected sir,

With reference to the above subject, we manufacture Liquid Bromine at our factory located at Greater Rann of Kutch, Near village Hajipir, Dist. Kutch, Gujarat, and have started Exports from 2<sup>nd</sup> week of January 2019 through Mundra port to various countries under self-sealing permission.

We are doing exports regularly in the month of January, 19 alone we exported 4 ISO tanks and in February we have already moved 2 ISO tanks to the Mundra seaport for a vessel ETA 10<sup>th</sup> February, 19) from Mundra port with the volumes likely to increase and likely to reach atleast 10-15 ISO tanks in February, 19 itself.

However, every time our consignment is marked to (check package ) scanning and re-examination during the registration of cargo for examination. Successively four of our shipments were marked for scanning and re-examination and during the re-examination by customs authority, our cargo/tank was found to be as declared in shipping bill / Invoice/ Packing List.

The details are as follows;

S/Bill No. and Date	No. Of Tank
1. 1478920 dtd. 22-01-2019	(01X20)
2. 1513244 dtd. 23-01-2019	(02X20)
3. 1516856 dtd. 23-01-2019	(01X20)
4. 1787845 dtd. 04-02-2018	(02X20)



**SATYESH BRINECHEM**  
Private Limited

Details of cargo is as given below:

Description : Liquid Bromine  
H.S. Code : 28013020  
UN NO. : 1744  
Class : 8  
Volume : Atleast 10-15 ISO per month.  
Cargo Rate : USD 3800 to 3900 per MT.

Our Cargo is a hazardous cargo packed in expensive special SOC ISO tanks and we export our Bromine to the highly competitive Chinese Market.

In view of the routine regular Exports from Mundra port and considering that we have been found complaint whenever our cargo was re-examined, we kindly request you to that in future our cargo be exempted from scanning and re-examining. (The next immediate shipment is 2 ISO tanks likely to reach Mundra seaport by 12<sup>th</sup>/13<sup>th</sup> February, 19).

We once again request you to consider our request favourably and oblige.

Thanking you,



For Satyesh Brinechem Private Limited  
N.M. Reshikeshan  
Vice President (Marketing)

Encl. : copy of shipping bills /invoice / D G declaration / tank scanning report/ up coming containers of booking.



**SATYESH BRINECHEM**  
Private Limited

Hand delivery

SBPL/02/18-19  
Date: 16.03.2019

To,  
DEPUTY COMMISSIONER (DE/RMS)  
Office of the Principal Commissioner of Customs  
Customs House,  
Mundra (Kutch), Gujarat - 370421.

**Sub: Request for waiver of scanning and re-examination of our self-sealing cargo -  
Liquid Bromine exported in our own SOC ISO Tanks through Mundra Port**

Ref.: Our letter bearing reference no. SBPL/01/18-19 dated 6<sup>th</sup> February, 2019

Respected Sir,

Apropos the captioned subject and in furtherance to our letter referred above, we had requested your good office for waiver of physical re-examination /scanning of SOC ISO Tank Containers carrying "Liquid Bromine" (H.S Code 28013020 DG cargo UN Class 8) for export on Self Sealing basis from Mundra Port, on account of its precarious quality.

Thereafter, your good office has directed us to produce "Authorized Economic Operator (AEO) Status" vide your Letter VIII/48-15/DE/RMS/Misc./18-19/8562 dated 25<sup>th</sup> February, 2019. In terms of your direction, we have applied for AEO Status and we will submit the AEO Certificate with your good office as soon as the same is received by us.

Ad interim, we humbly request your good office to waive off the requirement of scanning and re-examination of SOC ISO Tank Containers to avoid the delay in the customs clearances for serving our International Clients on a timely and efficient basis and thereby promoting the foreign export.

Thanking you in anticipation of your prompt positive action,

Yours faithfully,  
For, SATYESH BRINECHEM PRIVATE LIMITED

  
VALLIAPAN MANIKAM  
CEO





**SATYESH BRINECHEM**  
Private Limited

**THROUGH HAND DELIVERY**

Reference no. SBPL/03/18-19

Date: 29.03.2019

To,  
Mr. P V R Reddy,  
Chief Commissioner of Customs,  
Customs House, Navrangpura,  
Ahmedabad, Gujarat 380009.

**Re.: Request for waiver of scanning and re-examination of our self-sealing cargo - Liquid Bromine exported in our own SOC ISO Tanks through Mundra Port**

Respected Sir,

Apropos the captioned subject, we, M/s. Satyesh Brinechem Private Limited, Ahmedabad, have set up a green field manufacturing facility for the production of Industrial Salt and Liquid Bromine at Greater Rann of Kutch, Near Hajipir, Taluka Bhuj, District Kutch-370605, (Gujarat).

The multiple applications of Liquid Bromine have led to a remarkable growth in the global market. In regard to this, a part of the Bromine will be sold in the domestic market and majority will be exported.

We have recently commenced the production of Liquid Bromine and majority of the produce is exported. To avoid the delay in the customs clearances for serving our International Clients on a timely and efficient basis, we have applied to the Deputy Commissioner (DE/RMS), Office of the Principal Commissioner of Customs, Mundra, vide our letter bearing reference no. SBPL/01/18-19 dated 6th February, 2019, requesting them for waiver of scanning and re-examination of our self-sealing cargo - Liquid Bromine exported in our own SOC ISO Tanks through Mundra Port on account of its precarious quality. We further inform that repeated or prolonged exposure of Bromine may cause acute and chronic health effects.

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