



THE BOMBAY CUSTOM HOUSE AGENTS' ASSOCIATION

BCHAA/NG/361/2011

Date : 16th June, 2011

Airport Economic Regulatory Authority
AERA Building, Administrative Complex,
Safdarjung Airport,
New Delhi 110 003

Kind Attn. : Mr. Sandeep Prakash
Secretary

Dear Sir,

Sub : Feedback & reservations on proposal submitted for AERA approval by CSC - Mumbai Airport Consultation paper No 5 / 2011-12.

This refers the above consultation papers uploaded on your Website regarding operationalisation of Temperature Controlled facility at Mumbai Airport. We herein below give our observations.

- 1) There was no formal meeting held by MIAL to discuss the tariff and other operational aspects. There is total lack of clarity regarding
 - Tariff to be charged
 - Airlines to be handled
 - Service standards laid down for the operation
- 2) As stake holders, BCHAA is not aware about the legal status of CSC (Cargo Service Centre). There is total lack of transparency for their existence, operations and billing.
- 3) As regards Point No 7 – We totally disagree with the statement that CSC will provide a competitive environment at Mumbai Airport vis-à-vis other custodians. Primarily CSC is in existence now and is operating with select few exporters, agents and airlines. In short, this is being operated as close users group (CUG) facility. This defeats the entire purpose of its existence as the valuable space at ACC Mumbai is being utilized by a Private Operator to serve his select set of clients. This is unjustified and unfair to entire EXIM Trade.
- 4) As a Trade Association for 1300 + Custom House Agents operating at ACC Mumbai, we were shocked to learn about commencement of operation at CSC, by way of circular given by Emirates Airlines (Copy attached). MIAL has still not updated the stakeholders officially about the existence of CSC.
- 5) Customs Authorities at ACC Mumbai has still not given a Public Notice to the Trade regarding operations of CSC.



- 6) As regards Point No 10 – As one of the major stakeholders and Trade body approved by Central Board of Excise and Customs (CBEC), we submit that there has been no formal discussion by MIAL regarding operationalisation of CSC or User Agreement.
- 7) CSC has employed a back door mechanism and have already started the operations with **select few** exporters and airlines. CSC records can be verified and checked as they are already charging these select few players. In our opinion, it is dreadful to learn that in the beginning phase of its existence, CSC is mis-stating the facts to Govt. of India.

It would not be out of place to mention that the said facility has been constructed in place of hazardous warehouse which was in existence at ACC Mumbai. Resultantly, safety of 12000 – 15000 people working at ACC Mumbai is at stake and has been compromised.

In our opinion, attitude and approach of Authorities to bring CSC into existence has been high handed, lacks transparency and a sole motive seems to be to benefit a private operator.

We suggest that a proper meeting be called under your Chairmanship to resolve the matter.

Thanking you,

Yours faithfully,

For The Bombay Custom House Agents' Association,



Nailesh Gandhi
President

CC to
Chairman, Airport Authority of India
Chairman, CBEC
Executive Director (Cargo), Airports Authority of India
CCC, ZONE III
Commissioner of Customs (I), ACC Mumbai
Commissioner of Customs (E), ACC Mumbai
President, ACAAI,
Chairman, FIEO (W.R)
President, IMC,
President, MACCIA
President, AMTOI,

Email of Emirates Airlines (For your reference)

EK/CGO/EXP/11-12

May 12, 2011

Dear Cargo Partner,

Sub : Acceptance of Cargo at the New CSC Facility at Mumbai Cargo Terminal

Cargo Service Centre (CSC) will be starting operations at their New Facility at the Mumbai Cargo Terminal w.e.f 16 May,2011.

Emirates SkyCargo has signed up with CSC to assist you as well as your shipper for proper handling and Temperature Maintenance of Pharmaceuticals and Vaccines from this New Terminal.

We will therefore start accepting only Pharmaceuticals and Vaccines to begin with from this Terminal. Those Cargo Partners who wish to use this facility can do so effective May 16, 2011.

The Due Carrier Charges for all Pharmaceuticals and Vaccines cleared through this terminal i.e Carting and Screening will be the same as currently applied in addition the following changes in Miscellaneous charge.

Miscellaneous - (Code – MCC) - INR 1.75/-kg - MIN – INR150/-

We look forward to your support and co-operation.

Please do get in touch with our office if you require any further information or clarification.

Yours truly,

Patrick Mascarenhas
Cargo Sales Manager – Mah & Goa