

Kiran Rambhia

किरण रांबिया

President - BCBA

अध्यक्ष - बी.सी.बी.ए.



**Brihanmumbai Custom Brokers Association**

73/74, Mittal Tower, 'C' Wing, 7th Floor, Nariman Point, Mumbai-400 021.

Tel. No. : 91-22-4311 9100 / 9101 • Fax : 91-22-2285 2561

E-mail : president@bcbaind.com • info@bcbaind.com

Mobile : 098211 64052 • Website : www.bcbaind.com

Date : 9.9.2022

BCBA/KR/122:296/2022

Director (P&S, Tariff)

Airports Economic Regulatory Authority of India (AERA),

AERA Administrative Complex,

Safdarjung Airports, New Delhi – 110003

Dear Sir

Sub. : Comments on Consultation Paper No. 09/2022-23 dated 17.8.2022

We refer to the Consultation Paper No. 09/2022-23 dated 17.8.2022. At present import and export is facing delay in clearance due to issues faced with various stakeholders such as custodian, customs, PGA, airlines etc. We request that the proposal for reduction in demurrage free period should be considered only after prescribing SOP with specific time limit for entire activity with stakeholders such as Custodian, Customs, PGA's airlines etc.

The following points may be noted :

- 1) Right from landing of the cargo, i.e. flight checking, segregation, forwarding and delivery of cargo and vice-versa for exports, there should be specific time limit fixed with Custodian. At present the time limit being projected are not actual, and they need to be captured in EDI System on real time basis and monitored.
- 2) There is need to create robust infrastructure at ACC Mumbai. The present infrastructure was created decades ago and to cater to the present cargo volumes, we need better infrastructure.
- 3) Due to frequent breakdown of Customs EDI system and ICEGATE, it is resulting delay in entire process of clearance. We request that Custom Authorities should also be part of stakeholder consultation process and time limit needs to be set for Assessment and other activities.
- 4) Likewise of PGA's such as ADC, PQ, AQ, FSSAI, Textile Committee etc, we request that specific time limit for issuance of NOC should be prescribed. It is taking anywhere between 2 – 7 days for NOC from PGA.
- 5) The flight segregation time and inward date which is being reflected is not accurate and there is urgent need to provide this information on real time basis. We are enclosing submission made regarding the same.

Considering the above, we once again request that reduction of demurrage free period should not be considered.

We look forward to your co-operation in the matter in larger interest of EXIM Trade at ACC Mumbai.

Thanking you,

Yours faithfully,

For Brihanmumbai Custom Brokers Association

Kiran Rambhia

President

Mobile : 9821164052

Encl : As above

Copy to: [director-ps@aera.gov.in](mailto:director-ps@aera.gov.in) ; [secretary@aera.gov.in](mailto:secretary@aera.gov.in)

**Correspondence Address :**

04, Ramani Bhuvan, RRT Road, Mulund (W), Mumbai - 400080.

Tel. : 022-2561 9710 | Email : [kiranrambhia@gmail.com](mailto:kiranrambhia@gmail.com)

