



# KANDLA PORT STEAMSHIP AGENTS ASSOCIATION

Dt. 02<sup>nd</sup> February 2022.

To,

Mr. Zubair Riaz Kamili ,  
Director (Customs) ,  
Central Board of Indirect Taxes and Customs,  
R. No. 227-B, Department of Revenue,  
North Block, Rashtrapati Bhavan,  
New Delhi : 110 001 .



Shri. M. Ajit Kumar,  
Chairman ,  
Central Board of Indirect Taxes and Customs,  
North Block, Rashtrapati Bhavan,  
New Delhi : 110 001.

Dear Sir's,

**Sub : SCMTR Regulations 2018- issues.**

The implementation of the SCMTR Regulations have been extended shall come into force from 30.06.2022 for which all the trade stake holders are trying to get equipped with the system and for trials the shipping agents have already started filing necessary SAM. However they are unable to proceed on the system as still there are several defects in the system which is leading all trials to errors mode.

Few problems which still persist, we give you hereunder with a request to kindly make the system viable for a friendly use :-

1. The VCN number is given actually by the Port office through the PCS therefore to get a VCN number all the Ports including minor Ports should come under PCS structure which is not happening at several minor Ports. This is needed to be prepared with the Ports or some mechanism to be brought in that a VCN is generated automatically without intervention of the ports.
2. Some Ports where a VCN facility is available even at such Ports the Rotation number does not get generated if a vessel is arriving from any Indian Port, the system wants that all the



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vessels have to come from a foreign Port which is incorrect. The Criteria is that the vessels are either foreign trade or in coastal trade and the format given for VCN does not match with the trade practice it has to be therefore suited as per the original form and not that to get a VCN the system compels agents to write any foreign port that is a wrong manifestation.

3. Further to the above, the voyage info and the VCN has to be modified in the system into two parts:
  - a. Foreign Going Vessel.
  - b. Coastal Vessel.
4. The Coastal Trade encompasses of different type:
  - a. A Vessel is fully under Coastal.
  - b. A Vessel arrives in a foreign run and sails in a Coastal run.
  - c. A Vessel arrives in a Coastal run and sails in the foreign run.

Though for Coastal there is not much documentation we feel that a separate procedure may be set up in the SCMTR for the Coastal trade where all above 3 factors can be input.

5. Vessels which calls a Port also carrying the same bottom cargo or a transshipment cargo or a transit cargo requires full BL details to be filed in the SCMTR, even although the cargo is not meant for any Indian Port. Such information's or the copy of the BL is not available and the other countries concerned offices do not wish to disclose their BL data's with the Indian Agents and specially on a container vessel the Master also have very limited information and therefore as it was in the earlier icegate system the same should continue in the SCMTR also as (Same bottom Cargo: Yes/No.)
6. In the format of Shipping Profession it also happens that a vessel arrives under the Agency of "A" who files the IGM and after discharging the manifested cargo, the vessel can be fixed for a next voyage at the same port loading some export cargo under the agency of a different agent "B" under this circumstances since VCN is same a agent "A" files SAM and agent "B" has to file a SDM, thus unless the system provides a changeover or handing over of the agency from "A" to "B" on the same VCN number, it is not possible to further process the SCMTR documentation. Therefore in the SCMTR also there has to be a procedure that



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the agent "A" can transfer the agency to agent "B" and the agent "B" receives it and further all procedure is done by the Agent "B".

7. There are also vessels arriving Port sometimes for no import/exports, but for the following requirements :
- Bunker supply.
  - Provision of fresh water supply.
  - Crew change.
  - Repairs.
  - Arrested vessels
  - Changeover of Ownership
  - Any other reasons.

For such vessels there is no provision in the SCMTR to file the ballast SAM or SDM as such this is very important and provision in the SCMTR should be incorporated.

8. Under Container trade there is also a provision that the containers are transshipment at a Port to any other Port in India or any other dry ports in India or any other Port in foreign which is called Coastal or foreign transshipment containers .The SCMTR system should have this provision so that information's for the containers handled and received is recorded automatically and there is less chance of any error as of now the SCMTR system is rejecting such inputs which is requested to be incorporated in the system.
9. As per the SCMTR regulations the SAM has to be filed before the vessel sails from the last Port which is not possible for the bulk or breakbulk vessel which comes directly from load port to discharge port because no accurate documentation is available before sailing of the vessels but even upon sailing only a mate receipt is available when the vessel sails and the BL's are issued from the office in exchange of mate receipt after 1 or 2 days of the vessels sailing or even more as these b/l's issued in in exchange of the freight payments banking matters. Since SCMTR details have to be filed as per the BL details this is not possible therefore the format as per the present procedures should be follow which is as under:
- A vessel where voyage is more than 7 days from last port can file SAM 72 hours before entry inward is granted.
  - A Vessel whose voyage is above 24 hours upto 72 hours from the last port can filed SAM 24 hours before the entry is granted.



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- c. A vessel whose voyage is less than 24 hours from the last port can file the SAM any time before the entry inward is granted.
10. The stakeholder like CFS/Rail Operators /SEZ has to be included in the SCMTR as they are custodians and have to file the national bond with the customs.
11. There is also mode of shipment called LCL which compromises of several BL's cargo in one container. For the LCL shipments there is no format in the SCMTR which is needed to be incorporated.
12. The vessels calls the Port either with the cargo for discharge or in ballast (empty) for loading from the Port in such case a nill SAM has to be filed which is not probable in the SCMTR and when done it reads error, such format also need to be incorporated in the SCMTR.
13. The Cargoes are measured by units like weight/numbers/cubics (cbm) in the BL's however the SCMTR has a provision of only weight by metric tons and show error code of 048 when input therefore the system should allow any type of measurement which is accepted on the BL's such provisions is to be incorporated.
14. While filing the SAM the system also asked several documents from the Vessel master like crew list/ private property list/ store list etc. which is a declaration by the ship masters or the ship personals whereas the system demands that such personal details declarations of the vessel/crew has to be filed by the Agent which is too much and also lot of scope of feeding typographical error therefore such documents should be allowed to be scanned in a PDF and uploaded. The format used by the ships for these are international recognized IMO format however the system demands a different format which is not as per the international regulations. Therefore facility may be incorporated that such documents can be uploaded in PDF which is signed (more authentic) by the master/crew and since it is a declaration by entity which should always be direct from them and not that a agent declares on behalf of others personal declaration. Therefore the PDF format uploading may be incorporated and allowed as per the IMO formats.



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View all above we request you to kindly examine the above issues and to formulate the system user friendly and after the system is fully ready a minimum 6 months of time period may be given for the users to work on both the old and the new system so that if there is any linkup in the new system the work shall continually to happen as per the old system.

Thanking You,

Yours faithfully,  
For Kandla Port Steamship Agents Association,

  
President.



- Cc : Minister Of Shipping (MOPS&W), Director, (Sagarmala), Jt. Secretary, (Sagarmala) .  
: JS (Customs) Addl. Charge, Central Board of Indirect Taxes and Custom.  
: Joint Secretary (Customs), Central Board of Indirect Taxes and Customs.  
: Deputy Director, Directorate General of Systems, CBITC.  
: Joint Director, (ICEGATE), Director General of Systems, CBITC.  
: Additional Director General (ICEGATE), Director General of Systems, CBITC  
: Additional Director, Directorate General of Systems, Customs & Central Excise.  
: MD IPA / Dy. Director IPA.  
: The Principal Commissioner of Customs, Kandla Customs House, Kandla.  
: The Supdt. (MCD), Kandla Customs House, Kandla.