

Dated: 10 .02.2025

Shri. Dinesh Bouddh, IRS
Narcotics Commissioner,
Central Bureau of Narcotics,
19, The Mall, Morar,
Gwalior, M.P- 474006

Dear Sir,

Sub: Public Notice F. No. XVI/13/02/PC/Imp./2021 dated 2.09.2024 & Voluntary submission of monthly return – International Special Surveillance List (ISSL).

This has reference to the Public Notice 02.09.2024 issued by Central Bureau of Narcotics (CBN), Gwalior in the matter of proposed voluntary online submission of monthly simple data with regard to the chemicals under tentative International Special Surveillance List (“ISSL”).

While we understand the endeavour of the Government of India is to create awareness and monitor the ISSL chemicals, we would wish to submit that the chemicals, reagents, catalysts and solvents figuring in the ISSL are commonly used in various industry segments such as **chemicals, pharmaceuticals, fine chemicals, agrochemicals, dyes & paints, flavours and fragrances, automobile, fertiliser, petrochemical, refineries, plastic, consumer industries, jewellery** etc., to name a few sectors. Many of these chemicals, reagents, catalysts and solvents are imported, exported or traded and used by a large number of entities involved in its manufacturing, trading, supply, distribution and consumption. Hence, the requirement to submit monthly data pertaining to manufacture, import, export and domestic sale, even if voluntary in nature, is not practical, as it's impossible to create country wide awareness amongst these various industries, trade & consumers and achieve the objectives of filing monthly returns. It is our considered view that such a requirement will impact a huge number of entities by burdening them with additional compliances and a feat that would not serve the purpose intended by the Government.

It may also be recollected that, most of such entities involved with these chemicals, reagents, catalysts and solvents are required to file around 26-30 GST returns every year. This is in addition to returns which are required to be submitted under various other statutes including Customs Act, Income Tax Act, Companies Act, Factories Act, Labour Laws etc, as is applicable to their nature of business. Compliance under these laws being tedious and burdensome, prescribing this additional requirement of filing of monthly returns, would only make the process repetitive, as well add to the agony of the industry and trade reeling under the burden of filing multiple returns under various laws. Such additional compliance requirements would also have a decisive

counter effect on the ‘**ease-of-doing-business**’ and ‘**reducing compliance burden (RCB)**’ narrative of the Government of India.

Furthermore, it can be observed that the format provided for filing of the monthly returns, requires submission of details of import, domestic sale, export of the such chemicals and substances figuring in the ISSL, which even otherwise can easily be accessed and obtained from the GST website (‘GSTN’) or Customs website (‘ICEGATE’) by your good office.

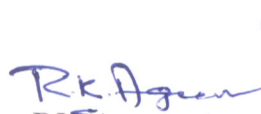
We therefore propose an alternative approach to monitor substances included in the ISSL:

- a) Raise general awareness of these chemicals, reagents, catalysts and solvents with various Industry, Trade associations and their members from all Industry, Trade sectors, on a periodic and continuous basis
- b) Develop simple KYC and voluntary code of conduct guidelines for Industry and Trade to follow
- c) Monitor and surveillance of the ISSL substances using GSTN and ICEGATE, offering complete traceability

Therefore, it is submitted that the requirement, even of the voluntary submission of the return to the Central Bureau of Narcotics (‘CBN’) should be withdrawn and the above approach, proposed be pursued.

It is humbly prayed for your immediate intervention in this matter.

Thanking you
Yours sincerely


RK Agrawal
National President

