

BDMAI/REP/DGFT/2025

Date: 9.12.2025

**Shri Ajay Bhandoo**  
**Additional Secretary & Director General**  
**Directorate General of Foreign Trade**  
**Vanijya Bhavan**  
**New Delhi**

Dear Sir

**Sub: Request for Amendment to Para 4.12 of Foreign Trade Policy Regarding Declaration of Consumption Details in Case of Deemed Exports**

**Greetings from Bulk Drug Manufacturers Association of India!**

On behalf of the bulk drug manufacturing industry, we would like to bring to your kind attention a critical issue faced by our member exporters regarding the implementation of Para 4.12 of the Foreign Trade Policy (FTP).

As per the said provision, exporters are required to declare consumption details of imported/exempted inputs on:

- **Shipping Bills** – in the case of direct exports, and
- **Tax Invoices** – in the case of deemed exports.

Our member exporters do not face any difficulty in declaring these details on shipping bills for direct exports, since shipping bills are not shared with customers. However, in the case of deemed exports, such sensitive consumption details must be mentioned on Tax Invoices, which are necessarily shared with domestic customers.

This requirement compels exporters to disclose confidential and critical production-related data to customers, thereby affecting their competitive position and exposing proprietary manufacturing information.

Further, the Policy permits exporters to ship finished products even before the actual import of raw materials, due to fluctuations in international markets, reliance on local sourcing, or logistical constraints. In such scenarios, exporter of finished goods take place before importing the relevant raw materials. Consequently, it becomes impractical for the exporters to furnish accurate consumption details of imported/exempted inputs at the time of export—whether direct or deemed.

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To comply with current procedural requirements, exporters are often forced to provide approximate data, which does not represent actual consumption and leads to avoidable inconsistencies at a later stage.

In view of the above challenges, we humbly request that Para 4.12 of the FTP be suitably amended, allowing exporters to furnish accurate consumption details at a later and more appropriate stage, such as:

- At the time of redemption/closure of Advance Authorisations, or
- While filing claims under Drawback / TED / RoDTEP schemes.

This amendment will ensure accuracy, preserve confidentiality of production data, and ease compliance for exporters—while fully meeting the objectives of the Policy.

We request your kind consideration of this genuine industry concern.

Thanking you  
Yours sincerely

  
M Roja Rani  
Executive Director

