

BDMAI/REP/CUSOMS/2026

Date: 9.1.2026

The Chairman
Central Board of Indirect Taxes and Customs (CBIC)
Department of Revenue
Ministry of Finance
New Delhi

Dear Sir,

Sub: Delays in obtaining NOCs for re-imports – Request for uniform SOPs

Greetings from Bulk Drug Manufacturers Association of India!

On behalf of our members, we would like to bring to your kind notice about a genuine problem being faced by them in cases of re-imports of goods.

It is understood that No Objection Certificates (NOCs) from the office of the Assistant/Deputy Commissioner of Customs are issued only after 4 to 6 weeks, in cases of re-imports. It is the case across all the ports, mainly due to prolonged sampling and testing.

At present, the applicant is required to apply for NOC through e-mail. After submitting the application along with required documents, ADC takes about a week to submit the sample for testing. The designated Government laboratories or private laboratories take a minimum of 3 weeks for testing and if there are any public holidays in the intervening period or if the laboratories do not have requisite material / instruments, the time taken for testing may go up to 4-5 weeks. After submission of sample testing report, the ADC takes another week for issuing the NOC.

The above prolonged procedure is resulting in heavy detention, demurrage and clearing charges on the exporters for their reimports apart from working capital blockage and loss of reputation in the international markets. Bonded warehouses also do not allow storage of such re-imports in anticipation of delays in clearances.

It may kindly appreciated that the re-imports are not fresh imports. These goods were exported under Customs supervision and re-import may be necessitated due to rejection / warranty return or for repair and return.

Despite clarifications / directions from your office (through circular Nos. 38/2016-Cus dated 22.08.2016 and 3/2022-Cus dated 01.02.2022) that Customs clearance must be risk-based and intelligence-driven and goods should not be detained due to pending inquiry, testing, or verification, the exporters continue to face undue delays in clearing their re-imports.

In view of the above, we request you to kindly issue common SOPs to be followed at all ports across the country, clearly providing the guidelines and timelines for clearances of re-imports. You may kindly consider the following suggestions, while formulating the SOPs:

- a) Testing may be dispensed with in cases where a) the goods are re-imported under Sections 69 / 74 / 75 of the Customs Act, b) the re-imports are due to rejection, warranty or repair & return and c) where documentary correlation with original export is established.
- b) Prescribe timelines for issuance of NOC like 3 days where testing is not required and 7 days where testing is required. In cases where testing is required, but could not be carried out in 7 days, due to any reason, the consignee may be allowed to take delivery of the goods with an undertaking that material will be kept 'as it is' at their factory, material samples will be provided to the lab authorized by the respective Customs and only after receiving confirmation from ADC, the material will be taken for re-processing.

We shall be grateful for your co-operation and necessary action, which would help in the industry in a long way.

With kind regards


M Roja Rani
Executive Director

