



MAXICON CONTAINER LINE

Frequently asked questions (FAQs) – Customer Related

Sea Cargo Manifest and Trans-shipment Regulations (SCMT), India

1. What is SCMT?

The new SCMT rules essentially require ocean carriers and associated cargo interests to complete their manifest submissions electronically and prior to the vessel's arrival at or departure from Indian ports. The guidelines suggest replacement of the Import General Manifest (IGM) & Export General Manifest (EGM) with the new Sea Arrival Manifest (SAM) & Sea Departure Manifest (SDM) respectively.

2. When do the new regulations come into effect?

The new regulations come into effect on 1st August 2019. However, as per the draft amendment of the SCMT guideline published on 12th July 2019, customs have proposed a transition period of 45 days (i.e., up to 15th September 2019) to enable all stakeholders to make necessary changes in their systems/processes. In consideration of the same, we will share the final go-live dates shortly.

3. Will the current deadlines pertaining to SI submission/HBL manifest/HSS/CFS-DPD Nomination Change under the new regulation?

Yes, the revised deadlines/vessel cut-offs to ensure timely submissions of the manifests are being worked on and a detailed advisory in this regard will be shared shortly.

4. Are there any new documentary requirements under the new regulations?

Yes, the new guidelines prescribe additional data fields in both the manifests. These data elements will be mandatory for all shipments originating, transiting and destined to India. The same can be submitted as part of the shipping instructions (submission guidelines to follow in later advisory). A brief on the new data fields are as follows:

- a. **HS Code:** 6-digit HS (Harmonized System) code for all unique cargo lines. HS code to be provided in the Shipping Instructions. SCMT seeks additional details about every cargo reported. The shipment may have multiple items falling under different HS codes, in such cases, multiple HS codes should be declared.
- b. **IEC Code:** 10-digit IEC (Import Export) code issued by DGFT pertaining to the Consignee for India destined imports & Shipper for India originating exports
- c. **PAN Number:** 10-digit PAN (Permanent Account Number) pertaining to Notify Party in case the said party is from India
- d. **Invoice Value:** Value of the cargo along with currency (3-digit alphabetical code) as per commercial invoice.
- e. **GST NO:** GST Identification number of Actual Importer.

5. Is invoice value a mandatory data requirement?

This is still a matter of policy discussion that is being evaluated by CBIC (Central Board of Indirect Taxes & Customs). Until such clarification, commercial invoice value will be considered mandatory. Till such time invoice value is included, same is considered declared by the shipper for the sole purpose of SCMT Filing.

6. Will the data requirements stated above remain same for cargo transiting through India to a foreign destination (Same bottom/ROB cargo)?

This is still a matter of policy discussion that is being evaluated by CBIC (Central Board of Indirect Taxes & Customs). Until such clarification, the above data will be considered mandatory

7. What do the new regulations say about HBL filing in the SAM/SDM?

HBL details can be filed in the manifest by the NVOCC/ forwarder directly. Details regarding the same are as below:

- **Filing by forwarder (2 options)**
 - a. Forwarders can file their HBL through our MAXICON India office
 - HBL filing fee (TBA)
 - Cut off (TBA)
 - b. House BL can also be filed directly by forwarders to Indian customs. After filing, forwarders to provide reference number (CSIN#) to NVOCCs which will be used while filing MBL by NVOCCs

Please Note: The above is basis the current understanding of the process flow. A detailed guideline on the same will be shared post further clarification from customs

8. Will updates be permitted to the Sea Arrival Manifest (SAM) or Sea Departure Manifest (SDM) post prescribed deadlines?

Yes, below are the guidelines prescribed by the customs regulations:

- i. **Sea Arrival Manifest (SAM)**
 - Shipping lines are required to submit Import manifest details to Indian Customs prior vessel departure from Last port of call before calling India, for all containers which are going to discharge at any port in India or are discharged for transshipment at any of the ports in India. In order to meet the above requirement, Bill of Lading need to be ready 72 hrs prior vessel sailing from Last Port of call.
- ii. **Sea Departure Manifest (SDM)**
 - Shipping Lines are required to submit Export manifest details to Indian Customs prior Sailing of Vessel from India port of loading, for all containers which are loaded on a said vessel from India. In order to meet this requirement;
 - S/I should be available 48hours prior vessel Arrival at Loading port

- Shipping Bill cut-off (export permit) 48hours prior to Arrival at Loading port

9. Amendments - Timeline and Penalty?

a. Departure Manifest:

Amendments will be allowed by customs without approval till Sea Departure Notification is filed which is after departure from port of call. Once the Sea Departure Notification is filed, amendment will be allowed only with approval from the customs officer.

b. Arrival Manifest:

Amendments will be allowed without approval before inward entry is filed, which is prior arrival at port of call. Once the entry inward is filed, amendment will be allowed only with the approval from the customs officer.

Disclaimer: The above interpretation of the Sea Cargo Manifest and Trans-shipment Regulations (SCMT) are as per Maxicon understanding of the process. For any further clarifications or queries, please directly refer to the guideline