

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 submission 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:

- 1. HS Code:** 6-digit HS (Harmonized System) code for all unique cargo lines
- 2. IEC Code:** 10-digit IEC (Import Export) code issued by DGFT pertaining to the Consignee for India destined imports & Shipper for India originating exports
- 3. PAN Number:** 10-digit PAN (Permanent Account Number) pertaining to Notify Party in case the said party is from India
- 4. Invoice Value:** Value of the cargo along with currency (3-digit alphabetical code) as per commercial invoice.

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

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 either the shipping line or the NVOCC/ forwarder directly. Details regarding the same are as below:

1. Filing by carrier/liner – A process like the current HBL manifestation process will be put in place. NVOCCs will have to submit documents as per a pre-defined timeline. This service will be on a chargeable basis. Exact timelines & charges will be communicated shortly
2. Filing by NVOCC/forwarder – The regulation stipulates that the NVOCC/forwarder can register themselves as part of SCMT by furnishing a bond of value INR ten lakhs. This bond is waived off in case an AEO-LO certificate is furnished (Please refer SCMT guidelines on www.icegate.gov.in for further information). The process for filing is as below:
 - a. NVOCC files a CSN (cargo summary notification) with HBL details – consigner/consignee/itinerary/cargo details
 - b. For each HBL, a PCIN (primary cargo identification number) is generated
 - c. The NVOCC must quote the PCIN to the shipping line for incorporation in final SAM/SDM

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:

1. **Sea Arrival Manifest (SAM)** – The regulations have prescribed 3 voyage types and corresponding timelines for manifest updation as an exception



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- a. "Long haul voyage" refers to voyage of more than 96 hours between departure from the last port of call and arrival at the next port – SAM can be updated up to 48 hours prior to estimated arrival
 - b. "Medium haul voyage" refers to voyage of 48 to 96 hours between departure from the last port of call and arrival at the next port – SAM can be updated up to 24 hours prior to estimated arrival
 - c. "Short haul voyage" refers to voyage of less than 48 hours between departure from the last port of call and arrival at the next port – SAM can be updated up to 6 hours prior to estimated arrival
2. **Sea Departure Manifest (SDM)** – The regulations have prescribed that as an exception the SDM can be updated up to 24 hours post departure from the port in consideration

Please Note: Although updates will be permitted as per above guidelines without penal action by customs, the exact shipping line deadlines/cut-offs and consequence of non-adherence and exception management will be communicated shortly

Disclaimer: The above interpretation of the Sea Cargo Manifest and Trans-shipment Regulations (SCMT) are as per Maersk's understanding of the process. For any further clarifications or queries, please directly refer to the guidelines on www.icegate.gov.in