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EDITORIAL

Friends,

Recently, a New Customs Scheme to Aid Cash Flow of Importers: Deferred Customs Duty Scheme for Eligible Manufacturer Importers [EMIs] has been introduced. Circular No. 08/2026-Customs operationalizes the policy framework introduced through Notification No. 12/2026-Customs (N.T.) dated 01 February 2026, whereby the facility of deferred payment of customs import duty is extended to "Eligible Manufacturer Importers" (EMIs). The facility, rooted in the proviso to Section 47(1) of the Customs Act, 1962, marks a structural reform in trade facilitation by aligning duty payment timelines with business cash-flow cycles.

The scheme becomes effective from 01 April 2026 and remains available up to 31 March 2028. It is governed by the Deferred Payment of Import Duty Rules, 2016 (as amended). By enabling deferred duty settlement, the measure enhances liquidity management for "manufacturing importers".

Eligibility Architecture for EMI Status:

The circular prescribes a comprehensive compliance-based eligibility matrix. The criteria integrate customs, GST, and financial integrity benchmarks to ensure that only demonstrably compliant and solvent entities obtain access to deferred duty benefits.

1. Manufacturer – Importer Nexus:

An applicant must qualify as an importer under the Customs Act and simultaneously be a manufacturer under the CGST Act, 2017. Alternatively, an importer sending inputs or capital goods to a job worker under Section 143 of the CGST framework also qualifies, provided documentary and return-filing requirements are satisfied.

2. Registration Prerequisites:

Applicants must possess:

- A valid Importer Exporter Code issued by Directorate General of Foreign Trade.
- At least one active GST registration reflecting manufacturing activity.
- A minimum customs transaction history (25 EXIM documents in the previous financial year, relaxed to 10 for MSMEs).

3. Compliance Integrity for EMIs

- Aggregate turnover exceeding ₹5 crore in the preceding financial year.
- Business operations spanning at least 2 financial years.
- Complete filing of all pending GSTR-3B returns.
- Absence of tax collected but not deposited under GST, Central Excise, or Service Tax regimes.

4. Clean Legal Record

The circular places significant emphasis on governance integrity. Applicants must demonstrate solvency certified by a Chartered Accountant and must not be subject to insolvency proceedings, arrest, conviction, or pending prosecution under indirect tax statutes. Past EMI approvals must not have been revoked due to misrepresentation or forged documentation.

Importers Get Going from 1st March 2026 to Avail Benefit from 1st April 2026: Applications for EMI approval are to be filed electronically on the **AEO portal beginning 01 March 2026**. Upon approval by the Directorate of International Customs, system-level enablement is performed within the Customs Automated System, eliminating procedural duplication for the importer.

A designated nodal person must register on ICEGATE, authenticate transactions, and validate deferred payment requests through OTP-based verification.

To avail the facility, **the importer must select the deferred payment option in the Bill of Entry by marking the prescribed payment flag**. Customs clearance is granted without immediate duty payment once authentication is completed.

The duty payment timeline is standardized as follows:

* **Imports cleared between 1st and last day of any month (except March):** Duty payable by the 1st day of the succeeding month.

* **Imports cleared during March:** Duty payable by 31 March of the same financial year.

The importer retains the flexibility to make early payment at any time within the deferred period, allowing alignment with internal treasury management policies.

Just to reiterate, we remain available over telecom or e-mail for any clarifications.

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TAX CALENDAR

Date	Form/Return/Challan	Reporting Period	Description
10th March	GSTR-7	Feb-26	Monthly return filed by individuals who deduct tax at source or TDS under the Goods and Services Tax (GST)
10th March	GSTR-8	Feb-26	Monthly return to be filed by e-commerce operators registered under the GST.
11th March	GSTR-1	Feb-26	Monthly Statement of Outward Supplies to be furnished by all normal registered taxpayers making outward supplies of goods and services or both and contains details of outward supplies of goods and services.
13th March	GSTR-1 (IFF)	Feb-26	Details of B2B Supply of a registered person with turnover upto INR 5 Crores during the preceding year and who has opted for quarterly filing of return under QRMP.
13th March	GSTR-5	Feb-26	Summary of outward taxable supplies and tax payable by a non-resident taxable person.
13th March	GSTR-6	Feb-26	Details of Input Tax Credit (ITC) received and distributed by an Input Service Distributors (ISD).

INCOME TAX

NOTIFICATION

AMENDMENTS INCOME TAX RULE 1962, RULE 114F, 114G, 114H.

OUR COMMENT: The Central Board of Direct Taxes, Department of Revenue, Ministry of Finance issued Notification No. 19/2026 dated 05.03.2026 notified that In exercise of the powers conferred by section 295 read with section 285BA of the Income-tax Act, 1961 (43 of 1961), the Central Government hereby makes the following rules further to amend the Income-tax Rules, 1962, namely:—

1. (1) These rules may be called the Income-tax (Amendment) Rules, 2026.

(2) They shall come into force on the 1st day of January, 2026.

2. In the Income-tax Rules, 1962 (hereinafter referred to as the said rules), in Rule 114F,—

(a) in clause (1),—

(A) after sub-clause (v), in the Explanation,—

(I) in clause (a), the following provisos shall be inserted, namely:–

"Provided that for an account other than a U.S. reportable account, the provision of this clause shall apply with the effect that the phrase "financial Institution in the ordinary course of a banking or similar business" shall be substituted by the phrase "depository institution":

Provided further that for an account other than a U.S. reportable account, a "depository account" shall also include —

(i) an account or notional account that represents all specified electronic money products held for the benefit of a customer; and

(ii) an account that holds one or more central bank digital currencies for the benefit of a customer';

(II) after clause (a), the following clause shall be inserted, namely:–

'(aa) "central bank digital currencies" means any digital fiat currency issued by a Central Bank;';

(III) in clause (h),—

(i) in sub-clause (vi), after item (D), the following shall be inserted, namely:—

"(E) a foundation or capital increase of a company provided that the account satisfies the following requirements, namely: —

(i) the account is used exclusively to deposit capital that is to be used for the purpose of the foundation or capital increase of a company, as prescribed by law;

(ii) any amounts held in the account are blocked until the Reporting Financial Institution obtains an independent confirmation regarding the foundation or capital increase;

(iii) the account is closed or transformed into an account in the name of the company after the foundation or capital increase;

(iv) any repayments resulting from a failed foundation or capital increase, net of service provider and similar fees, are made solely to the persons who contributed the amounts; and

(v) the account has not been established more than 12 months ago:

Provided that the provisions of item (E) shall apply in respect of an account other than a U.S. reportable account;";

(ii) after sub-clause (vii), the following sub-clause shall be inserted, namely:—

"(viii) a depository account, other than U.S. reportable account, which represents all specified electronic money products held for the benefit of a customer, if the rolling average ninety-day end-of-day aggregate account balance or value during any period of ninety consecutive days did not exceed USD 10,000 at any day during the calendar year or other appropriate reporting period;";

(b) in clause (2), after the proviso, the following proviso shall be inserted, namely:–

"Provided further that for an account other than a U.S. reportable account, "financial asset" shall also include any interest (including a futures or forward contract or option) in a relevant crypto-asset;";

(c) in clause (3), in the Explanation,—

(i) in clause (b), the following proviso shall be inserted namely:––

'Provided that for an account other than a U.S. reportable account, "depository institution" shall also include an entity that holds specified electronic money products or central bank digital currencies for the benefit of customers;';

(ii) in clause (c),—

(I) in sub-clause (A), in item (iii), the following shall be inserted, namely:—

'Provided that for an account other than U.S. reportable account, the provisions of item (iii) shall apply with the effect that the phrase "financial assets" shall be substituted by the phrase "financial assets or relevant crypto-assets".

Provided further that for an account other than U.S. reportable account, the item (iii) shall not include the provision of services effectuating exchange transactions for or on behalf of customers.

Explanation.— For the purposes of item(iii), the term "exchange transaction'' means any –

(i) exchange between relevant crypto-assets and fiat currencies; and

(ii) exchange between one or more forms of relevant crypto-assets;"

(II) in sub-clause (B), below Explanation 2, the following proviso shall be inserted, namely:—

"Provided that for an account other than a U.S. reportable account, the provisions of sub-clause (B) and Explanation 1 shall apply with the effect that the phrase "financial assets" shall be substituted by the phrase "financial assets or relevant crypto-assets".";

(d) in clause (5),—

(i) in sub-clause (a), in item (i), for the words "depository institution;", the following shall be substituted, namely:—

"depository institution; or

(ii) with respect to the activity of maintaining central bank digital currencies for account holders which are not financial institutions, governmental entities, international organizations or central banks:

Provided that the provisions of item(ii) shall apply in respect of an account other than a U.S. reportable account;";

(ii) after sub-clause (h), the following sub-clause shall be inserted, namely:–

"(ha) a qualified non-profit entity in respect of an account other than a U.S. reportable account;";

(iii) in the Explanation, after clause (M), the following clause shall be inserted namely:—

"(MA) "Qualified Non-Profit Entity" means an entity resident in India that has obtained confirmation by the Income-tax Department or other governmental authority of India that such entity meets all of the following conditions, namely: —

(i) it is established and operated in India exclusively for religious, charitable, scientific, artistic, cultural, athletic, or educational purposes; or it is established and operated in India and it is a professional organisation, business league, chamber of commerce, labour organisation, agricultural or horticultural organisation, civic league or an organisation operated exclusively for the promotion of social welfare;

(ii) it is exempted from income tax in India;

(iii) it has no shareholders or members who have a proprietary or beneficial interest in its income or assets;

(iv) the applicable laws of India or the entity's formation documents do not permit any income or assets of the entity to be distributed to, or applied for the benefit of, a private person or a noncharitable entity other than pursuant to the conduct of the entity's charitable activities, or as payment of reasonable compensation for services rendered, or as payment representing the fair market value of property which the entity has purchased; and

(v) the applicable laws of India or the entity's formation documents require that, upon the entity's liquidation or dissolution, all of its assets be distributed to a Governmental entity or other entity that meets the conditions set out in (i) to (v), or escheat to the Government of India or any political sub-division thereof;";

(e) after clause (5), the following clause shall be inserted, namely:—

"(5A) "relevant crypto-asset" means any crypto-asset—

(a) that is not a Central Bank Digital Currency; or

(b) that is not a specified electronic money product; or

(c) for which the reporting crypto-asset service provider has adequately determined that it cannot be used for payment or investment purposes;";

(f) in clause (6), in item (vi) of sub-clause (F) of the Explanation, the following shall be substituted, namely:—

"(vi) the excess of gains over losses from the sale or exchange of financial assets;"

(g) in clause (8), in sub-clause (b), for sub-clauses (i) and (ii), the following sub-clauses shall be substituted, namely:—

"(i) an entity, the stock of which is regularly traded on one or more established securities markets;

(ii) any entity that is a related entity of an entity mentioned in item (i);";

(h) after clause (9), the following shall be inserted, namely:—

"(9A) "Specified Electronic Money Product" means any product that satisfies following criteria, namely:—

(a) it is a digital representation of a single fiat currency;

(b) it is issued on receipt of funds for the purpose of making payment transactions;

(c) it is represented by a claim on the issuer denominated in the same fiat currency;

(d) it is accepted in payment by a natural or legal person other than the issuer; and

(e) it is, by virtue of regulatory requirements to which the issuer is subject, redeemable at any time and at par value for the same fiat currency upon request of the holder of the product.

Explanation – For the purposes of this clause, —

(i) 'Specified Electronic Money Product' does not include a product created for the sole purpose of facilitating the transfer of funds from a customer to another person pursuant to instructions of the customer;

(ii) a product is not created for the sole purpose of facilitating the transfer of funds if, in the ordinary course of business of the transferring entity, either the funds connected with such product are held longer than 60 days after receipt of instructions to facilitate the transfer, or, if no instructions are received, the funds connected with such product are held longer than 60 days after receipt of the funds;

(iii) "fiat currency'' means the official currency of a country or territory, issued by such country or territory, or by the designated Central Bank or monetary authority of such country or territory, as represented by physical banknotes or coins or by money in different digital forms, including bank reserves and Central Bank Digital Currencies, including commercial bank money and electronic money products (including specified electronic money products);"

3. In the said rules, in rule 114G,--

(a) in sub-rule (1),--

(i) in clause (a), the following proviso shall be inserted, namely:--

"Provided that in the case of an account other than a U.S. reportable account, a reporting financial institution shall also, –

(i) maintain and report whether the account holder has provided a valid self-certification; and

(ii) report whether the account is a joint account, including the number of joint Account Holders.";

(ii) in clause (b),--

(A) in sub-clause (i), for the words "residence;" occurring at the end, the words "residence; and" shall be substituted.

(B) In sub-clause (ii), the following proviso shall be inserted, namely:-

"Provided that in the case of an account other than a U.S. reportable account, a reporting financial institution shall also –

(i) maintain and report the role by virtue of which each reportable person is a controlling person of the entity and whether a valid self-certification has been provided for each reportable person;

(ii) report whether the account is a joint account, including the number of joint Account Holders.";

(iii) in clause (c), the following proviso shall be inserted, namely:–
–

"Provided that in the case of an account other than a U.S. reportable account, a reporting financial institution shall also maintain and report the type of account and whether the account is a pre-existing account or a new account;";

(iv) in item (ii) of clause (e), the following shall be substituted, namely:—

"(ii) the total gross proceeds from the sale or redemption of financial assets paid or credited to or with respect to the account during the calendar year with respect to which the reporting financial institution acted as a custodian, broker, nominee, or otherwise as an agent for the account holder;"

(v) after clause (f), the following clause shall be inserted, namely:--

"(fa) in the case of an account other than U.S. reportable account, where any equity interest is held in an investment entity that is a legal arrangement, the role(s) by virtue of which the reportable person is an equity interest holder;";

(b) in sub-rule (4), after the proviso, the following proviso shall be inserted, namely:--

"Provided further that for an account other than a U.S. reportable account, the reporting financial institution shall obtain the taxpayer identification number and date of birth whenever it is required to update the information relating to the pre-existing account pursuant to the rules made under the Prevention of Money-Laundering Act, 2002(15 of 2003).";

(c) after sub-rule (6), the following sub-rule and proviso shall be inserted, namely:--

"(6A) Notwithstanding anything contained in sub-clause (ii) of clause (e) of sub-rule (1) and unless the reporting financial institution elects otherwise with respect to any clearly identified group of accounts, the gross proceeds from the sale or redemption of a financial asset are not required to be reported to the extent such gross proceeds from the sale or redemption of such financial asset are reported by the reporting financial institution under the Crypto-Asset Reporting Framework: Provided that the provisions of this sub-rule shall apply in respect of an account other than U.S. reportable account.";

(d) after sub-rule (11), the following sub-rule shall be inserted, namely:--

"(12) Notwithstanding anything in sub-clauses (b) and (fa) of sub-rule (1) of this rule, with respect to each reportable account other than a U.S. reportable account that is maintained by a reporting financial institution as of 31st December, 2025 and for reporting periods ending by the second calendar year following such date, information with respect to the role by virtue of which each reportable person is a controlling person or equity interest holder of the entity is only required to be reported if such information is available in the electronically searchable data maintained by the reporting financial institution.";

4. In the said rules, in rule 114H,—

(a) in sub-rule (2),--

(i) in clause (d), for sub-clause (ii), the following sub-clause shall be substituted, namely:--

"(ii) in case of other reportable account, the 1st January, 2016 or, if the account is treated as a financial account solely by virtue of the amendments to the Common Reporting Standard, on or after 1st January 2026;";

(ii) in clause (h), for sub-clause (II), the following sub-clause shall be substituted, namely:--

"(II) in case of other reportable account, the 31st December, 2015 or, if the account is treated as a financial account solely by virtue of the amendments to the Common Reporting Standard, as of 31st December 2025;";

(b) in sub-rule (6), in clause (a), in sub-clause (ii), in item (B), the following proviso shall be inserted, namely:-

"Provided that in the case of an account other than a U.S. reportable account, if the reporting financial institution is not legally required to collect and maintain information in accordance with the rules made under the Prevention of Money-laundering Act, 2002 (15 of 2003), it must apply substantially similar procedures for the purpose of determining the controlling persons;";

(c) in sub-rule (7), after clause (a), the following clause shall be substituted, namely:--

"(aa) in the case of an account other than a U.S. reportable account, in exceptional circumstances where a self-certification cannot be obtained by a reporting financial institution in respect of a new account in time to meet its due diligence and reporting obligations with respect to the reporting period during which the account was opened, the reporting financial institution must apply the due diligence procedures as applicable for the pre-existing accounts to such new accounts, until such self-certification is obtained and validated;";

(d) after sub-rule (8), the following sub-rule shall be inserted, namely:--

"(9) For the purposes of rule 114F, 114G and this rule, exchange of any information in respect of any transaction in relevant crypto-assets is only for the limited purposes of administration of taxes by the relevant jurisdiction.".

[For further details please refer the Notification]

GST

CASE LAW

PRINCIPAL COMMISSIONER OF CENTRAL GOODS AND SERVICE TAX GURUGRAM VERSUS M/S. CARRIER AIR CONDITIONING REFRIGERATION LTD: PUNJAB AND HARYANA HIGH COURT

OUR COMMENTS: In the Instant case **"**Export of services - Business Auxiliary Services rendered by the assessee to an overseas group entity qualify as export of services under the Export of Services Rules, 2005 - taxable under Section 65(19) sub-clause (iv) of the Finance Act, 1994 - location of service receiver governs export status" **-** wholly owned subsidiary of Carrier Corporation, USA, which in turn is a subsidiary of United Technologies Corporation and is engaged in manufacturing, selling and distribution of various types of Air conditioning and refrigeration equipment.

Business Auxiliary Services as export of service - location of service receiver governs export status – It has been held that The High Court examined the facts that the assessee forwarded Indian customer enquiries to an overseas group entity, which contracted directly with the Indian customers and invoiced and supplied the goods, while the assessee received commission in convertible foreign exchange. The Tribunal had held that the actual recipient of the services was the overseas entity and that Rule 3(1)(iii) of the Export of Services Rules, 2005 looks to the location of the service receiver rather than the place of performance. The Court took note that the issue is authoritatively decided by the Supreme Court in Commissioner of Service Tax-III v. Vodafone India Limited [2025 (8) TMI 938 - SUPREME COURT], which affirmed that the location of the service receiver is the relevant factor for export status and rejected the Revenue's contention that services performed in India with ultimate Indian beneficiaries are taxable. Applying that precedent to the present facts, the Court concluded that the assessee's activities fall within the Export of Service Rules and are not exigible to service tax as Business Auxiliary Services. [Paras 6, 8, 11]

The services rendered by the assessee to Carrier China qualify as export of service and are not taxable as Business Auxiliary Services; the appeal is dismissed.

Final Conclusion: The High Court, applying the Supreme Court's ruling in Vodafone India Limited, held that the assessee's Business Auxiliary Services were export of services (receiver located outside India) and dismissed the Revenue's appeal challenging the Tribunal's order.

[For further details please refer the Case Law.]

FEMA

CIRCULAR

REPORTING UNDER FOREIGN EXCHANGE MANAGEMENT ACT, 1999 – RETURNS PERTAINING TO EXTERNAL COMMERCIAL BORROWING (ECB)

OUR COMMENTS: The Chief General Manager, Central Office, Foreign Exchange Department, Reserve Bank of India, issued Circular No. 23 dated 18.02.26 attention of Authorised Persons is invited to the Master Direction – Reporting under Foreign Exchange Management Act, 1999. The Reserve Bank has issued the Foreign Exchange Management (Borrowing and Lending) (First Amendment) Regulations, 2026 dated February 09, 2026 (published in the official gazette on February 16, 2026) for revising the External Commercial Borrowing (ECB) Framework. The forms for returns pertaining to ECB, prescribed under the Master Direction ibid, have been modified in light of the revised ECB Framework.

2. In view of the above, Part V - Annex I and Part V - Annex II of the Master Direction – Reporting under Foreign Exchange Management Act, 1999 shall be substituted with the format given at Annex I (Form ECB 1 / Revised Form ECB 1) and Annex II (Form ECB 2) to this circular respectively.

3. Authorised Persons may bring the contents of the circular to the notice of their customers/ constituents concerned.

4. The directions contained in this circular have been issued under sections 10(4), 11(1) and 11(2) of the Foreign Exchange Management Act, 1999 (42 of 1999) and are without prejudice to permissions / approvals, if any, required under any other law.

5. These directions shall come into force with immediate effect.

[For further details please refer the Circular.]

CUSTOMS

CIRCULAR

EXTENSION OF DEFERRED PAYMENT OF CUSTOMS DUTY BENEFITS TO 'ELIGIBLE MANUFACTURER IMPORTER' (EMI)

OUR COMMENTS: The Central Board of Indirect Taxes and Customs, Department of Revenue, Ministry of Finance, issued Circular No. 08/2026-Customs dated 28.02.202 clarified that kind attention is invited to Notification No. 12/2026-Customs (N.T.) dated 01st February, 2026 permitting "Eligible Manufacturer Importer" (EMI) to avail the facility of deferred payment of Customs import duty under proviso to sub-section (1) of section 47 of the Customs Act, 1962. The facility of Deferred Payment of Customs Duty shall be made available to the eligible EMIs with effect from 01.04.2026.

2. The facility of deferred payment of Customs import duty shall be governed by the Deferred Payment of Import Duty Rules, 2016, as amended. It is expected that the extension of this facility to the Eligible Manufacturer Importers shall expedite the Customs clearance of their imported goods at the Ports/Airports/ICDs. The facility shall be available to EMI till 31st March 2028 and it is expected that such approved EMI will be able to obtain AEO T2/T3 accreditations within such time which will enable EMI to have assured facilitation and priority treatment and avail other benefits available to AEO T2/T3. The existing benefits of AEO accredited entities will also be expanded.

3. The facility of deferred payment of Customs import duty shall be available to Eligible Manufacturer Importers which satisfy the following criterion:

a. Manufacturer and Importer status: Must be an importer as defined under section 2(26) of the Customs Act, 1962 and must be a manufacturer as defined under section 2(72) of the CGST Act or; In case the applicant is not a manufacturer then he must be an importer sending their inputs/capital goods, without payment of tax, to a job worker for job work under the provision of Section 143 of CGST Act;

b. IEC: Must have a valid Importer Exporter Code (IEC) issued by DGFT;

c. Customs footprint: Must have filed not less than 25 EXIM documents (Bills of Entry/Shipping Bills) in the previous financial year preceding the date of application. For an MSME applicant, the minimum requirement for filing EXIM documents is relaxed to 10;

d. GST registration: Must have at least one active GST Registration Certificate issued under the CGST/SGST Act, 2017;

e. Manufacturing declaration in the active GSTIN: In case the applicant is a manufacturer, it must have declared in the FORM REG-01 (either Col. 16(d) or Col. 20(d)) of the active GSTIN, the nature of business activity being carried out at the mentioned premises as "factory/manufacturing". Where the applicant has multiple active GST registrations, at least one active GSTIN must indicate the nature of business activity as "factory/manufacturing" in REG-01. In case the applicant is not a manufacturer but any of its active GSTINs sends their inputs/capital goods, without payment of tax, to a job worker for job work under the provision of Section 143 of the CGST Act, then such GSTIN must have filed the last two half-yearly GSTR ITC-04. Further, the job worker must also have an active GSTIN and must have declared in the FORM REG-01 (either Col. 16(d) or Col. 20(d)), the nature of business activity being carried out at the mentioned premises as "factory/manufacturing". Where the job worker has multiple active GST registrations, at least one active GSTIN must indicate the nature of business activity as 'factory/manufacturing' in Form REG-01;

f. Turnover threshold: The annual aggregate turnover of all GSTINs having the same PAN number of the applicant must exceed Rs. 5 Crore in the last financial year;

g. Business continuity: Must have business activities for at least two (02) financial years preceding the date of application. In case of a manufacturer, the "date of commencement of business" of the active GST Registration (which has at least one premise where the nature of business activity being carried out is declared as "factory/manufacturing") must be prior to 02 financial years from the date of application. In case the applicant is not a manufacturer but any of its GSTINs send the inputs/capital goods, without payment of tax, to a job worker for job work under the provision of Section 143 of the CGST Act, then the date of such GST Registration must be prior to 02 financial years from the date of application;

h. GST compliance: The applicant must have filed all pending GSTR-3B returns in respect of all active GSTINs, which were due for filing as on the date of submission of the application for availing the facility;

i. GST collected but not deposited: There must not be any instances of duty collected by the applicant but not deposited with the Government under the CGST Act, 2017;

j. Central Excise and Service Tax collected but not deposited: There must not be any instances of duty collected by the applicant but not deposited with the Government under either the Central Excise Act, 1944 or Chapter V of the Finance Act, 1994;

k. Insolvency/bankruptcy: An applicant must be financially solvent during the two financial years preceding the date of application. The applicant should not be listed currently as insolvent, or in liquidation or bankruptcy. The applicants must submit a Certificate issued by a Chartered Accountant in the prescribed form;

l. Arrest/Convictions: The applicant or its proprietor (in case of the proprietorship firms) or any of its partners (in case of the partnership firms) or any of its Board of Directors/Directors must not have been arrested or convicted for an offence under the Customs Act, 1962, the Central Excise Act, 1944, Chapter V of the Finance Act, 1994, or the CGST/SGST Act, 2017, or any other law for the time being in force;

m. Prosecution: There must be no pending prosecution proceedings against the applicant or its proprietor (in case of the proprietorship firms) or any of its partners (in case of the partnership firms) or any of its Board of Directors/Directors under the Customs Act, 1962, the Central Excise Act, 1944, Chapter V of the Finance Act, 1994, or the CGST/SGST Act, 2017 or any other law for the time being in force;

n. Past rejection: The applicant's earlier application for grant of approval as "Eligible Manufacturer Importer" must not have been rejected for the reason that an information or declaration submitted by the applicant in its earlier application was found to be false or a document submitted in the earlier application was found to be forged;

o. Past suspension: The applicant's status as "Eligible Manufacturer Importer" granted in the past must not have been suspended on the grounds that an information or declaration submitted by the applicant in its earlier application for grant of approval as "Eligible Manufacturer Importer" was subsequently found to be false or a document submitted in the earlier application was found to be forged.

[Explanation: Existing AEO-T1 entities (including MSMEs) who meet the above eligibility criteria shall also be eligible to apply under this scheme.]

4. The Eligible Manufacturer Importer desirous of availing the facility of deferred payment of duty shall register and submit applications, with effect from the 01st March, 2026 electronically on the web portal www.aeoindia.gov.in under the tab "Eligible Manufacturer Importer" in the prescribed form as per Appendix-I accompanied by upload of documents prescribed in Appendix-II and Appendix-III. After scrutiny and satisfaction of eligibility conditions, the designated officer of Directorate of International Customs (DIC), CBIC shall approve the application as an "Eligible Manufacturer Importer". Further, at the time of granting approval, the designated officer of DIC, CBIC shall update the details in the Customs Automated System to enable the facility of deferred payment of duty. No further action will be required by the EMI in order to avail the facility.

5. Upon approval, the nodal person appointed/authorized by the EMI shall obtain ICEGATE login following the procedure laid down in the Advisory on 'www.icegate.gov.in'. The same is available on the following link (https://www.icegate.gov.in/guidelines/registration-2). The contact details of such nodal person shall be provided in ICEGATE login for verification and authentication. The nodal person shall authenticate all Customs related transactions on behalf of the EMI.

6. The eligible EMI intending to make deferred payment of Customs import duty shall indicate the same using flag "D" in the Payment Method Column of the Bill of Entry filed. In order to ensure that the facility of deferred payment of Customs import duty is availed only by the eligible importer, an option has been provided in ICEGATE login for the nodal person on behalf of the EMI, to acknowledge such intent and authenticate it using One Time Password (OTP) sent to his registered email address/ contact number. The nodal person would be able to authenticate multiple Bills of Entry at once. Only on such authentication, the Customs clearance would be

provided for the subject consignment under the Deferred Payment of Import Duty Rules, 2016.

7. The due dates for making the deferred payment of Customs import duty are specified in rule 4 of the said Rules, and are reproduced for reference as follows:

i. For goods corresponding to Bill of Entry returned for payment from 1st day to the last day of any month other than March, the duty shall be paid by the 1st day of the following month;

ii. For goods corresponding to Bill of Entry returned for payment from 1st day to 31st day of March, the duty shall be paid by 31st March.

8. The Eligible Manufacturer Importer may also have an option to select the challans belonging to the deferred period and pay the Customs import duty anytime, even before the due date, at his convenience.

9. Reports regarding availment of deferred payment of Customs import duty at each Customs station of import is available to the Principal Commissioner/Commissioner of Customs in ICES in their standard reports and Commissioner dashboards. The Principal Commissioner/Commissioner of Customs may monitor the same for imports pertaining to his jurisdiction and ensure timely payment of the Customs import duty as per the said Rules. Instances of non-payment may be brought to the notice of DIC, CBIC. Further, the designated officer of DIC, CBIC may suspend/revoke such approval granted under para 4 of this circular, if the EMI becomes ineligible for the facility of deferred payment of Customs import duty at any point in time.

10. The DIC has set up a dedicated helpline (Email: emihelpdesk-dic@gov.in; Phone No. 011-23310014) to receive from trade and industry any queries, suggestions, feedback, complaints, grievances, etc. and take necessary measures to address them in a time-bound manner. Any other difficulties in implementation may be brought to the notice of the Board.

[For further details please refer the Circular.]

DGFT

TRADE NOTICE

LAUNCH OF CREDIT ASSISTANCE FOR E-COMMERCE EXPORTERS UNDER EXPORT PROMOTION MISSION (EPM) – NIRYAT PROTSAHAN.

OUR COMMENTS: The Directorate General of Foreign Trade, Department of Commerce, Ministry of Commerce & Industry issued Trade Notice No. 31/2025-26 dated 06.03.2026 attention is invited thatt the Credit Assistance for E-Commerce Exporters intervention under the Export Promotion Mission (EPM) – NIRYAT PROTSAHAN is hereby implemented with prospective effect.

2. The intervention seeks to enhance access to working capital for Micro, Small and Medium Enterprises (MSMEs) involved in international value chains through ecommerce, enabling them to manufacture goods in advance of anticipated demand and scale their participation in global markets.

3. Under this Intervention, credit guarantee cover will be available to banks for credit assistance extended by them in the form of Cash Credit, Overdraft, or other Working Capital facilities to eligible beneficiary entities, in accordance with the coverage parameters. These facilities will also be supported through interest subvention, in accordance with the notified ceilings.

4. The intervention is being operationalised on a pilot basis through the Export-Import Bank of India (Exim Bank). The detailed Policy framework is enclosed as ANNEXURE-I.

The Operational and Procedural Guidelines is enclosed at ANNEXURE-II. The governance Structure is enclosed at ANNEXURE-III

5. The intervention shall be operationalised on a pilot basis for feedback, institutional learning, and data-driven refinements. Guidelines for pilot implementation are enclosed at ANNEXURE-IV

6. The guidelines are further submitted for stakeholder feedback in accordance with Paragraph 1.07A of the Foreign Trade Policy (FTP) 2023. Stakeholders may submit comments and suggestions on the Guidelines within 30 days from the date of issuance of this Trade Notice, through email at epm-dgft@gov.in

This is issued with the approval of the Competent Authority.

[For further details please refer the Trade Notice.]

TRADE NOTICE

OPERATIONALISATION OF INTER-MINISTERIAL GROUP (IMG) FOR SUPPLY CHAIN RESILIENCE.

OUR COMMENTS: The Directorate General of Foreign Trade, Department of Commerce, Ministry of Commerce & Industry issued Trade Notice No. 30/2025-26 dated 03.03.26 attention is invited that in pursuance of the decision taken in the meeting held on March 02, 2026 under the Chairmanship of Special Secretary, Department of Commerce & DG, DGFT to assess the impact of ongoing geopolitical developments on India's exports, particularly supply chain disruptions, an Inter-Ministerial Group (IMG) for Supply Chain Resilience has been constituted under the Department of Commerce.

2. The IMG will monitor global developments affecting supply chains, assess sector-wise export and critical import vulnerabilities, facilitate coordination among Ministries/Departments, engage with stakeholders including Export Promotion Councils, and recommend appropriate mitigation measures, wherever required.

3. An internal coordination mechanism has also been established within DGFT to enable real-time tracking of issues and inter-agency coordination.

4. Trade and industry stakeholders may bring to notice specific issues relating to supply chain disruptions for consolidation and monitoring at adg1- dgft@gov.in for examination and appropriate coordination.

This issues with the approval of the Competent Authority.

[For further details please refer the Trade Notice.]

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5. **Quick 3 Day GST Registrations, IMS**
6. **Notification of Finance Act 2025 from 1st October 2025.**

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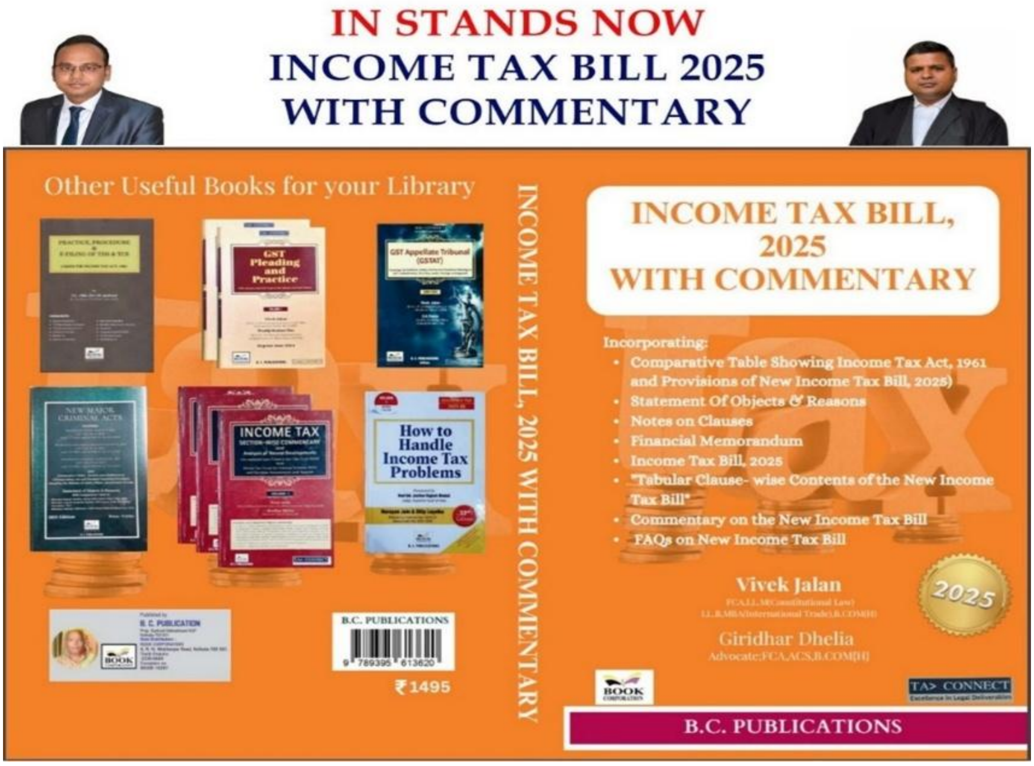

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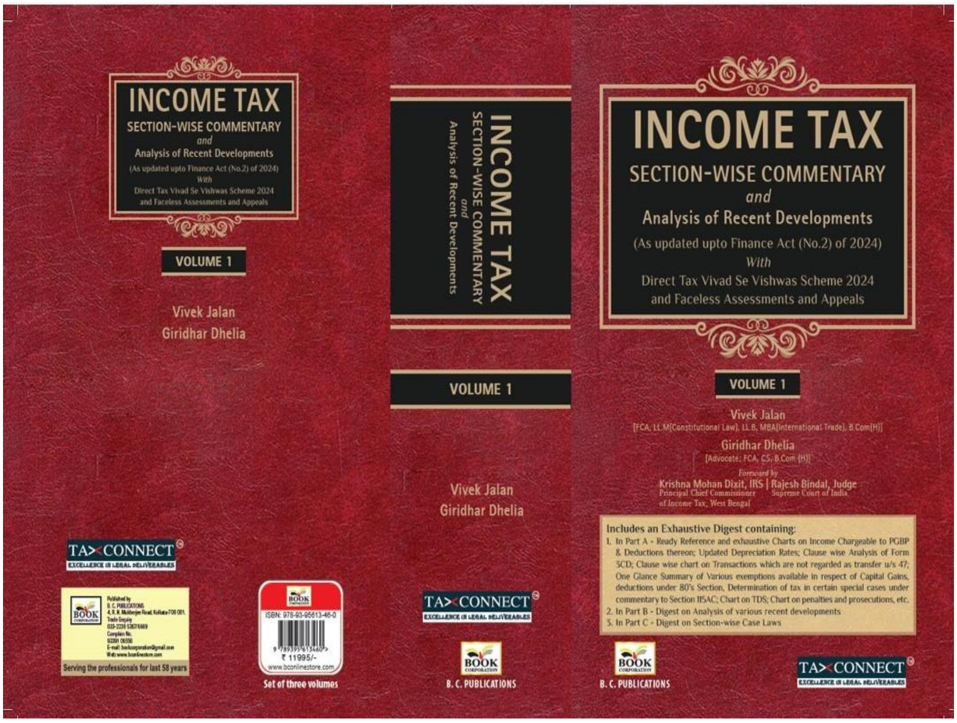

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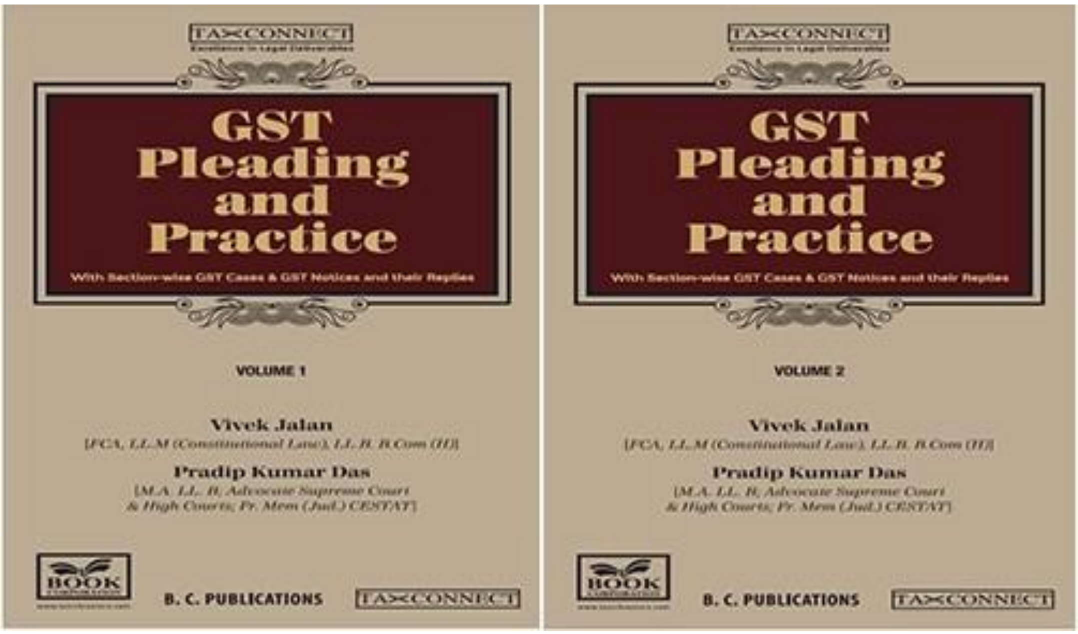

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