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Dear Madam/Sir(s)

Please refer to the discussions held during the stakeholder consultation meeting held regarding Paper Import Monitoring System (PIMS) on 9.1.2026 and the minutes of the meeting (copy attached) received vide DPIIT email dated 13.1.2026.

2. As per the minutes, considering that no consensus was arrived, all the participants have been asked to submit their written submissions regarding PIMS.
3. In this regard, please refer to the EPCES email dated 17.8.2025 (copy attached) making a written submission about the problem due to PIMS and suggesting that registration under PIMS should be discontinued as it is not really required; the basic purpose can be served by the data from DGCIS; it is increasing transaction time and cost for importers and exporters and hence against the government initiative of improving EoDB. Further, even if PIMS is continued despite it being against improving EoDB, SEZs and EOUs, being export oriented, should not be even more not required to register under PIMS and furthermore, SEZ /EOU to DTA transactions should not be required under PIMS as they are superfluous and against the aim of PIMS as explained in the email.
4. However, EPCES is re-submitting its views as desired, as follows :
 - (i) Registration under PIMS is not required as the HS code wise data is available from the office of Direct General Commercial Intelligence & Statistics, Kolkata. Specific data can be provided by the DGCIS on the basis of quick estimates if requested by DPIIT through D/o Commerce. Collection of data again through PIMS when information is available in the Bill of Entry for import is duplication and against the principle of Ease of Doing Business and it increases transaction time and costs for business persons, both importers and exporters. Advance collection of information about import does not serve much purpose as policy can be examined based on last three months data as well, if required, though import policies should be stable over at least one year period, if not more, for policy stability purposes.
 - (ii) Recently, the High Level Committee on Non-Financial Regulatory Reforms under the chairmanship of Shri Rajiv Gauba, Member, NITI Aayog has also recommended revoking the Steel Import Monitoring System issued vide DGFT Notification No 17/2015-2020 dated 5.9.2019. They have observed that Monitoring import and export data at the tariff-line level falls under the purview of the Directorate General of Foreign Trade (DGFT). Ministries can seek information from DGFT whenever required. Imposing an additional monitoring system that demands prior registration and data submission duplicates DGFT's functions and risks turning the mechanism into an import-licensing tool rather than a monitoring exercise.
 - (iii) Registration under PIMS should not be required for SEZs and EOUs as they are primarily for exports. They generally import for the purpose of fulfilling

export commitments. In any case, import of paper (Ch 48) by SEZs/EOU during 2023-24 was USD 87 million which is just 2.9% of the total import of paper of USD 3 billion by the country which itself is just 0.44% of the total imports of all commodities of USD 678 billion.

(iv) Registration by SEZ /EOUs on supply from SEZ to Domestic Tariff Area is irrational. Registration, if at all done, should only be done at the time of import from abroad. If registration under PIMS has already been done at the time of import from abroad and if the same paper or the paper products made out of the imported paper are supplied into DTA, units should not be asked to register on PIMS as the imported paper consumed has already been registered under PIMS and this is leading to duplicate reporting of imports under PIMS. Similarly, if the paper products are manufactured using domestically procured paper and these paper products are supplied in DTA and then registered under PIMS is also incorrect as it is not import from abroad. The DGFT office has wrongly done it as the basic purpose of PIMS is for monitoring of imports from abroad which does not and should not include supply from SEZ/EOU to DTA. This has perhaps been done under the impression of definition of imports under SEZ Act which includes supply from SEZ to DTA as import. As stated earlier, PIMS is aimed at monitoring imports from abroad. Even the definition of imports under SEZ Act does not include supply from SEZ to DTA as it is as follows :

"(o) "Import" means -

- (i) bringing goods or receiving services, in a Special economic Zone, by a unit or Developer from a place outside India by land, sea or air or by any other mode, whether physical or otherwise; or
- (ii) receiving goods, or services by, Unit or Developer from another Unit or Developer of the same Special Economic Zone or a different Special Economic Zone."

However, it does not matter and SEZ/EOU to DTA should not be asked to register under PIMS as it has no logic. In any case, total supply of paper (Ch 48) from SEZ to DTA was just 30 million USD in 2023-24 (1% of total imports of paper of the country).

5. It may kindly be noted that once any import monitoring system is started increasing the transaction time and cost, the domestic producers are unlikely to agree for its withdrawal and hence it will be unlikely that any consensus can be reached. However, DPIIT and DGFT have to ensure examination of the utility of any control/monitoring system as well as its adverse impact on EoDB.

6. In view of the facts mentioned above and in view of the recommendation of the High Level Committee as stated above, it is requested that Paper Import Monitoring System, issued vide DGFT Notification No 11/2015-2020 dated 25.5.2022 may be revoked and DPIIT may request DGFT for the same.

7. However, even if PIMS is continued despite it hardly serving any purpose and it being against improving EoDB, SEZs and EOUs, being export oriented, should not be required to register under PIMS.

8. Further, even if SEZ and EOU are required to register under PIMS, SEZ /EOU to DTA transactions should not be required under PIMS as they are superfluous, counting imports twice and against the aim of PIMS as explained above.

With regards,

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2 attachments

 **EPCES Mail dated 17.8.2025- EoDB problems because of Registration under Paper Import Monitoring System by SEZs and EOUs.pdf**

273K

 **Minutes of the Stakeholder Consultation meeting held on 9.1.2026 regarding PIMS.pdf**

259K