



Director General EPCES <dg@epces.in>

Request for EPCES Recommendation to Ministries and Authorities on SIMS / BIS Compliance for Imports of Hot Finished Seamless Steel Tubes

5 messages

exim@ekc.in <exim@ekc.in>

18 September 2025 at 14:32

To: dg@epces.in, naveensaxena@epes.in, ddg ddg <ddg@epces.in>

Cc: sanjiv.kapur@ekc.in, Vinay Chopra <vinay.chopra@ekc.in>, mahesh kelkar <kelkar.mahesh@ekc.in>

Respected Sir,

We humbly seek your kind attention and support on an urgent and critical matter that is threatening continuity of our production and exports from our SEZ/EOU unit.

We are engaged in the manufacturing and export of **High-Pressure Seamless Gas Cylinders**, for which our principal raw material is **Hot Finished Seamless Steel Tubes (JIS G3429-88, Grade 34CrMo4 / 37Mn)**, imported under **ITC HS Codes 73045930 / 73045130**.

These steel tubes are **specially designed and developed for cylinder manufacturing**, and are **not covered under Steel QCO 2020**. The IS standards notified under QCO 2020 — **IS:1161:2014** (for Structural Purposes) and **IS:4270:2001** (for Water Wells) — are irrelevant to our imports and applications.

Until recently, the **SIMS portal allowed registration through the OPEN route** for such goods not covered under QCO 2020. However, the recent system change has removed the OPEN route, mandating **BIS NOC for all imports**, including those like ours, which are outside the scope of Steel QCO 2020.

This sudden change has created a **deadlock situation**, as consignments already shipped or in transit cannot be registered under SIMS without BIS NOC, leading to imminent production stoppage and disruption in meeting both domestic and export obligations.

In view of the above, we earnestly request EPCES to kindly recommend to the **Ministry of Steel, DGFT, CBIC, DPIIT, and other concerned authorities** for:

1. **Continuation of SIMS OPEN route** for seamless steel tube imports under HS 73045930 / 73045130, intended for High-Pressure Gas Cylinder manufacturing, which are outside the scope of QCO 2020.
2. **Exemption from BIS NOC** for such imports, as they are not covered under any Indian Standards notified in QCO 2020.
3. **Grant of interim relief** for consignments already shipped, arrived, or in transit, to avoid disruption of production and exports.

We also humbly seek an **opportunity for a personal meeting** to present our case in detail and provide all supporting technical documents for your kind perusal.

Your urgent recommendation is of utmost importance to safeguard our production continuity, employment, and export commitments.

With highest regards,



Indrajit Singh
Sr. Manager-EXIM
Everest Kanto Cylinder Ltd

204, Raheja Centre, 214, Free Press Journal Marg Nariman
Point, Mumbai 400 021, Maharashtra, India

T: +91 22 49268395 (D)

From: exim@ekc.in <exim@ekc.in>

Sent: 16 September 2025 16:33

To: 'naveensaxena@epes.in' <naveensaxena@epes.in>; 'ddg ddg' <ddg@epces.in>

Cc: 'sanjiv.kapur@ekc.in' <sanjiv.kapur@ekc.in>; 'Vinay Chopra' <vinay.chopra@ekc.in>; 'mahesh kelkar' <kelkar.mahesh@ekc.in>

Subject: Request for EPC Recommendation to Ministry of Steel – Continuation of SIM Registration under OPEN Route

Dear Sir,

We seek your kind support in obtaining an urgent recommendation to the **Ministry of Steel** on a critical issue impacting our production and exports.

We are a leading manufacturer and exporter of **High-Pressure Seamless Gas Cylinders** in India. Our principal raw material is **Hot Finished Seamless Steel Tubes as per JIS G3429-88, Grade 34CrMo4 / 37Mn** (ITC HS Codes 73045930 / 73045130), which are specifically imported for captive use in cylinder manufacturing.

Until recently, we were registering our imports under the **OPEN route in the SIM portal**. However, the **OPEN option has now been removed**, leaving only SEZ/AAL routes available.

We respectfully submit that these tubes are **not covered under the notified Indian Standards under Steel QCO 2020**, and hence **BIS registration is not applicable**. Their **exclusive end-use is for manufacturing High-Pressure Seamless Gas Cylinders**, and our imports have always been cleared on the basis of **self-declarations and end-use undertakings**.

The sudden requirement of **BIS NOC for SIM registration** has created a serious challenge: consignments already shipped, arrived, or in transit cannot be registered, which will result in **complete stoppage of production and exports**.

In this regard, we kindly request EPC's recommendation to the **Ministry of Steel** to:

1. **Allow continuation of SIM registration under the OPEN route** for imports of Seamless Steel Tubes (JIS G3429-88, 34CrMo4/37Mn) intended exclusively for manufacturing High-Pressure Gas Cylinders.
2. **Provide interim relief (via-media solution)** for consignments already imported or in transit, permitting registration and clearance without BIS NOC.

Your strong recommendation to the Ministry will greatly help safeguard our production continuity and export commitments.

We look forward to your kind support and urgent action in this matter.

With regards,



Indrajit Singh
Sr. Manager-EXIM
Everest Kanto Cylinder Ltd

204, Raheja Centre, 214, Free Press Journal Marg Nariman
Point, Mumbai 400 021, Maharashtra, India

T: +91 22 49268395 (D) Mobile No.8010776321

Director General EPCES <dg@epces.in>

18 September 2025 at 16:03

To: exim@ekc.in

Cc: naveensaxena@epes.in, ddg ddg <ddg@epces.in>, sanjiv.kapur@ekc.in, Vinay Chopra <vinay.chopra@ekc.in>, mahesh kelkar <kelkar.mahesh@ekc.in>

Dear Mr Singh

As informed earlier, if you are facing difficulties in submitting information after selecting the closest IS under the BIS route, pl send the screenshot/details to helpdesk with a copy to us so that the same can be taken up with Steel Ministry. You will have to take an NOC from the Steel Ministry and then you can register your imports under SIMS and import.

Regards,

Alok Chaturvedi



Director General EPCES <dg@epces.in>

Request for Interim Relief & Continuation of SIMS OPEN Route for Import of Hot Finished Seamless Steel Tubes (JIS G3429-88, Grade 34CrMo4 / 37Mn)

3 messages

SKD <skd@ramacylinders.in>

18 September 2025 at 17:49

To: "sanjay.roy14@nic.in" <sanjay.roy14@nic.in>, "appointment.fm@gov.in" <appointment.fm@gov.in>, "secyexp@nic.in" <secyexp@nic.in>, "dg@epces.in" <dg@epces.in>, "dgft@nic.in" <dgft@nic.in>, "naveensaxena@epces.in" <naveensaxena@epces.in>

Cc: Vashu Ramsinghani <vashu@ramacylinders.in>, Amit Ramsinghani <amit@ramacylinders.in>, Milind Khadke <milind.khadke@ramacylinders.in>, Pramod Sangwai <pramod.sangwai@ramacylinders.in>, Vijay Ingle <vijay.ingle@ramacylinders.in>, Trupti Pusalkar <trupti@ramacylinders.in>, Jatin Chendwankar <jatin@ramacylinders.in>, Tushar Shende <tushar@ramacylinders.in>

Dear Sir,

We humbly submit below representation for your consideration regarding a matter of urgent concern to our industry (High Pressure Seamless Steel Gas Cylinders) -

1. Product Details & Critical Usage

We are importing Hot Finished Seamless Steel Tubes (JIS G-3429, Grade 34CrMo4 / 37Mn & its equivalent) under ITC HS Codes 73043939 / 73043929 / 73043919. These tubes are essential & special type of raw materials for the manufacture of High-Pressure Seamless Steel Gas Cylinders.

These specific grades (34CrMo4 & 37 Mn) are rarely available in the Indian domestic market to meet the total demand of the Indian high-pressure gas cylinder industry.

The entire Indian high-pressure gas cylinder industry is dependent on the import of these tubes. Any disruption in their availability would severely damage the industry, potentially resulting in a complete halt in production. This, in turn, would adversely affect revenue generation for the Government of India

This led to - Disruption in the supply of Medical Oxygen cylinders to government hospitals and healthcare institutions AND Failure to meet committed deliveries of CNG cylinders to the automotive industry and CGD companies, with significant downstream effects on energy, medical, and industrial sectors.

2. Non-Applicability of Steel QCO 2020

The Steel Quality Control Order (QCO) 2020 covers:

- IS 1161:2014 – Steel Tubes for Structural Purposes
- IS 4270:2001 – Steel Tubes for Water Wells

The imported tubes (JIS G-3429, grade 34CrMo4 / 37Mn & its equivalent) are not governed by these IS standards and thus fall outside the purview of the Steel QCO 2020. Therefore, the requirement of BIS certification or NOC should not apply to these imports of Seamless Steel Tubes.

3. Previous SIMS OPEN Route Procedure-

Until recently, the SIMS (Steel Import Monitoring System) portal allowed registration under the OPEN route, alongside SEZ, EOU, and Advance Authorisation routes.

Imports through all these categories, including the OPEN route, did **not require a BIS NOC** for products not covered by the QCO. This system functioned efficiently, facilitating timely clearance of our tubes. Therefore, these imports were exempt from the requirement of a BIS NOC.

4. Sudden Removal of OPEN Route Option

The recent removal of the OPEN route from the SIMS portal has caused inadvertent disruption. The portal now requires BIS NOC for all steel imports, regardless of whether they fall under the Steel QCO 2020.

This has unintentionally brought import of Seamless steel tubes in question (JIS G-3429)—within the ambit of the BIS NOC requirement, which is not aligned with the QCO provisions & NOT applicable in our case.

5. Practical & Procedural Challenges

Though we are attempting to file applications for BIS NOC requirements, we are facing significant technical, procedural, and system-level issues in the available link in SIM portal.

Despite contacting the helpdesk, resolution timelines are unpredictable. As a result, import clearances are being delayed, and consignments are stuck, affecting our production schedules and export commitments.

In Light of the Above, We Most Humbly Request:

1. Immediate permission for continuation of SIMS registration through the OPEN route for imports of Seamless Steel Tubes under HS Codes 73043939 /73043929/73043919, which are not covered under the Steel QCO 2020.
2. Exemption from BIS NOC for these specific grades and standards, since they fall outside the scope of the notified IS standards under the QCO.
3. Grant the Interim permission/relief for all shipments & consignments that are already dispatched, in transit, or have arrived at Indian ports, to be cleared under SIMS registration without requiring BIS NOC, following the previous OPEN route procedure—until the BIS NOC process is established.

Hope you will understand above & will give us interim relief for the imports of our Seamless Steel Tubes.

Once you will provide the relief, please give us an opportunity to present our case in person, along with supporting technical documents, to clarify the practical difficulties faced and ensure continuity of operations across the High pressure gas cylinder manufacturing Industry.

We respectfully submit that this matter is of **critical national importance**, as it impacts Industries production, public health infrastructure, energy sectors, and India's export commitments.

We shall remain grateful for your kind and prompt intervention in this matter.

Regards,

Shashidhar Kumar Das

GM- Materials

Rama Cylinders Pvt Ltd.

HO- Mumbai (Maharashtra) 022-22162344/45/46

Plant – Gandhidham (Kutch -Gujarat) Tel-02836-253144 ,

Mobile No. – 9879607682

Email- skd@ramacylinders.in , [Web-www.ramacylinders.in](http://www.ramacylinders.in)



To: secy-steel@nic.in

Cc: csoffice@nic.in, rajiv.gaubha@gov.in, OSD cum Special Secretary Commerce <rajesh.agrawal@nic.in>, secy-ipp@nic.in

Dear Sir

Please refer to the trailing email from M/s Rama Cylinders Pvt Ltd regarding the difficulties being faced by them in applying for NOC under SIMS using the newly introduced system whereby "OPEN" option in the route of import has been done away with and units have to use "BIS" option and select the closest IS code even if the imported steel is not covered under any QCO/IS. We have received similar representations from other units too.

They want to follow the new system of taking NOC but they are unable to file application for NOC in the SIMS portal because of software issues. They have stated that this sudden change has created problems for their imports getting stuck leading to penalties and their factory getting closed down.

It is requested that

(i) an urgent meeting on short notice may be held by the Steel Ministry with them to hear and address their problems in using the system for getting NOC, and

(ii) till the software issues are resolved old system may be restored for 10-15 days so that their imports and production are not disrupted with this sudden change in software.

With regards,



(Alok Chaturvedi)



Alok V Chaturvedi, IAS(Retd)

Director General,

Export Promotion Council for EOUs and SEZs,

A101, 10th Floor Himalaya House 23, KG Marg, New Delhi, Delhi 110001

Mobile +91 8130525959 | Tel: +91 11 23329770

website : <https://www.epces.in/>

twitter : @dgepces (<https://twitter.com/dgepces>)

Export Promotion Council for EOUs (Export Oriented Units) and SEZs (Special Economic Zones) (EPCES) is a multi-product Export Promotion Council set up by the Ministry of Commerce and Industry, representing the interests of SEZ units, SEZ developers and Export Oriented Units. It has 5971 members with 4629 SEZ units, 384 SEZ developers and 958 EOUs. In FY 2023-24, total exports of goods and services from SEZs were recorded at US \$ 163.69 billion and export of goods from EOUs at 17.2 billion.

[Quoted text hidden]

Director General EPCES <dg@epces.in>

19 September 2025 at 14:43

To: SKD <skd@ramacylinders.in>

Dear Sir,

Please refer to the trailing email from the Director General, EPCES, addressed to the Steel Secretary and other officials, concerning the issue you raised.

Best regards,
Govind Yadav