

GOVERNMENT OF PAKISTAN
DIRECTORATE GENERAL OF CUSTOMS VALUATION
CUSTOM HOUSE KARACHI

File No. DG(V)/Val.Rev/613/2016

19052

Dated: 27th July 2016

**Order in Revision No. 211 /2016 under section 25-D of the Customs Act, 1969
against Valuation Ruling No.868/2016 dated 09-06-2016**

- i. This copy is granted free of charge for the private use of the person to whom it is issued.
- ii. An appeal against this Order-in-Revision lies to the Appellate Tribunal, Customs having jurisdiction, under section 194-A of the Customs Act, 1969, within stipulated period as prescribed under the law. An appeal should bear a court fee stamp of Rs.1000/- (Rupees one thousand) only as prescribed under schedule-II item 22 of the Court Fee Act, 1870 and must be accompanied by a copy of this Order.
- iii. An extra copy of appeal, if filed, should simultaneously be sent to this office for information and record.
- iv. If an appeal is filed, the appellant should state whether he desires to be heard in person or through an advocate.

M/s Dollar Industries and Others

VERSUS

PETITIONERS

Director, Customs Valuation, Karachi:

RESPONDENT

Date(s) of hearing:

23-06-2016 & 21-07-2016

For the Petitioner:

1. Mr. Imran, M/s Dollar Ind.
2. Mr. Zafar Salim, M/s Salim & Co.
3. Mr. Zamiruddin, M/s Zubair & Co.
4. Mr. Saleemuddin, M/s Asra Ent
5. Mr. Nadeem Ahmed Mirza, Advocate
6. Mr. Mutahir Hakim, M/s Maxi Inc
7. Mr. M. Ali, M/s Toray Plastic
8. Mr. Ali Aftab, M/s Shark Stationary
9. Mr. Furqan Makki, M/s Adil & Co.
10. Mr. Usman, M/s Five Star
11. Mr. Zeeshan
12. Mr. M. Junaid, M/s Real Ent
13. Mr. Jamaluddin M/s Global Pen
14. Mr. Channa M/s Brother Pen Co.
15. Mr. Yahya M/s Kings Pen
16. Mr. Abbas M/s Brother Corp.
17. Mr. Jamal Uddin M/s Feroze Corp.



For the Respondent:

1. Mr. Rizwan Bashir Deputy Director
2. Mr. Iqbal Hussain Appraiser

This revision petition was filed under section 25-D of the Customs Act, 1969 against customs value determined vide Valuation Ruling No.868/2016 dated 09-06-2016 issued under section 25-A of the Customs Act, 1969, inter alia, on the following grounds:

2. The subject valuation ruling has been issued without taking into consideration the methods of determining the customs value, as per the procedure laid down in section 25 of the Customs Act, 1969.
3. Prior to the issuance of subject Ruling, a meeting was held on 18th May 2016 at the office of the Director Customs Valuation whereby substantial evidences on transaction values were demonstrated and submitted, which included respective contracts, proforma invoices, letter of credits, invoices, packing lists, goods declaration and sales tax invoices.
4. A comparison chart showing the unrealistic difference between the values prevailed earlier and notified now is enclosed herewith for your ready reference.
5. It is humbly prayed that the Honourable Director General of Customs Valuation may be pleased to set aside the impugned valuation ruling and immediately suspend its implementation in the interest of justice and valuation of stationery items may kindly be reconsidered by taking into account the substantial evidences of transaction value available with Customs Department of identical and similar goods.
6. The respondent department was asked to furnish comments to the arguments submitted by the petitioner in the case. The parawise comments by the department on the petition are given as under:
7. It was brought to the notice of this Directorate General of Customs Valuation that the values of various types of stationery items have considerably increased in the international market as compared to the determined customs values of stationery items of different origins vide Valuation Ruling No.585/2013, dated 30-09-2013 read with corrigendum dated 01-11-2013. The Valuation Ruling No.585/2013, dated 30-09-2013, related to customs values of stationery items of different origins was considerably old and required revision in line with the prevailing prices in the international market. Therefore, this Directorate General initiated an exercise for determination of customs value for stationery items. Hence, the customs values has been determined under section 25A of the Customs Act, 1969, vide valuation ruling No.868/2016, dated 09-06-2016



Parawise Comments

8. Para-1 Denied. The impugned valuation ruling is itself a speaking one which reveals that Valuation methods given in section 25 of the Customs Act, 1969 were followed to arrive at fair value of stationery items. Transaction value method provided in section 25 (1) was found inapplicable owing to wide variation in the values being declared to the customs. Identical / similar goods value methods provided in section 25(5) & (6) were examined for applicability to the valuation issue in the instant case which provided some reference values of the subject goods but the same could not be exclusively relied on due to wide variation in declared values of

subject goods. Thereafter, market enquiry as envisaged under section 25(7) of the Customs Act, 1969, was conducted. As the stakeholders were not forthcoming with the values of the local manufacturers as being traded in the international market, therefore different markets were surveyed repeatedly for this purpose. Online prices were also obtained to corroborate the findings of the market surveys. Computed value method as provided in section 25(8) could not be applied for valuation of the aforementioned goods as the cost of raw material and fabrication charges under clause (a) and amount of profit and general expenses under clause (b) of section 25(8) of the Act, in the country of export, could not be ascertained. All the information so gathered was evaluated and analyzed for the purpose of determination of customs values. Consequently, the customs values of different types of stationery items have been determined under section 25(9) of the Customs Act, 1969.

9. Para-2. Contested. The importers submitted some evidences but the same were not comprehensively and mostly pertained to import invoices. The prices obtained from local market as well as prevailing prices in the international market significantly are higher than the prices of physical import data in terms of section 25 of the Customs Act, 1969.

10. Para-(3). Need no comments being comparison chart provided by the petitioner.

11. Para-(4). Contested. The values determined via valuation ruling No.8689/2016, dated 09-06-2016 are on perfectly in order and require no re-consideration.

Prayer

12. It is respectfully prayed that the customs values of the subjected goods were determined strictly in accordance with section 25A, read with methods laid down in section 25 of the Customs Act, 1969 and finally, were determined under section 25(9) of the Customs Act, 1969. The petition is not based upon any corroboratory documents in support of their contention. Accordingly, the petition has no merit for consideration and is liable to be rejected.

13. The counsel of M/s Real Enterprises also contended in their petition as follows:

14. The Petitioner is aggrieved by the impugned Valuation Ruling No.868/2016 dated 09.06.2016 whereby, the Respondent, the learned Director Valuation, has determined C&F Customs value of various types of stationery items appearing in Anex-A for China and all other origins.

FACTS

15. That the Petitioner imports various Stationery items from China in retail packing mostly at a transaction value ranging which starts from US \$ 1/kg and goes upto 4.5/kg. However, the assessments were always finalized as per previous Valuation Ruling No. 858/2013 dated 30.09.2013 now superseded by impugned Ruling.

16. That the impugned Valuation Ruling No. 868/2016 dated 09.06.2016 has been issued in haste and hurry, without learning the Petitioner, whereby the values already determined in previous valuation ruling No.585/2013 dated 30.07.2013 have been increased manifold without



any lawful justification. Moreover, 31 more items have been added by the Learned Director fixing their Customs value on much higher side. Resultantly, the Petitioner who is importing all items on actual transaction value will have to pay Customs duty 86% to 1300% higher than the actual duties. If the impugned Valuation Ruling is not revised immediately the Petitioner will be badly affected and the business activities will be completely come to a halt.

17. That the Petitioner was though not called in the meeting held on 18.05.2016, however, when he came to know about the meeting he submitted Import documents on 01.06.2016 such as Commercial Invoice, LC, Price List, market survey bills and analysis sheet etc. However, all the valid and legal documents/evidences have been totally ignored, not considered and discarded. Had the Learned Director, gone through all these evidences the value so determined through impugned Ruling would have been totally different. This Honourable Authority is respectfully Prayed to consider all these evidences at this stage.

18. That para 5 of the impugned valuation ruling prescribes methodology adopted by the Learned Director to determine the customs values. A careful analysis of para 5 reveals that the impugned Ruling has been issued under sub section (9) of section 25 of the Customs Act 1969, directly, skipping all previous sub-sections. The Learned Director to give justification in this regard, has observed that sub section (1) to (6) cannot be complied with due to various reasons. The market enquiry was also conducted under sub-section (7) but the result of the enquiry has not been incorporated in para-5. This shows that the market inquiry was in favor of the importers. Sub section(9) clearly stipulates that sub section (1) to (8) shall be used to determine value under sub section (9). When the Learned Director himself shows inability to follow previous sub sections (1) to (8), the determination of value under sub- section (9) is impossible. Therefore, this defect renders whole Ruling ultravires Section 25 of the Customs Act 1969.

19. That many items of all origins of the world have been fixed on one value which is against the provisions of sub-section (13) of section 25 of the Customs Act 1969. Fixing value of all brands of all origins at one/same price is even otherwise against the definition of Identical Goods and Similar Goods stipulated in Section 25 (13) of the Customs Act, 1969. The definition appearing at Clause (b) of sub-section 13 of Section 25, clearly states that "Identical goods means which are the same in all respects including physical characteristics, quality and reputation. Minor differences in appearance would not preclude goods otherwise conforming to the definition from being regarded as identical."

20. That Clause (e) of sub-section 13 of Section 25, further clarifies the definition of Identical Goods or Similar Goods as "goods shall not be regarded as identical goods or similar goods unless they were produced in the same country as the goods being valued." As such by fixing identical goods of the world at one and the same value is totally illegal, un-lawful and unauthorized.

21. That the learned Director has totally ignored foregoing definitions of identical goods and similar goods prescribed in the Customs Act 1969, while fixing all brands of all origins at one value. This inherent defect has rendered the impugned Ruling totally ultra vires Section 25 of the



Customs Act, 1969. This defect is not curable in any manner and there is only one option to make the ruling lawful i.e. to fix the value origin-wise, keeping in view quality and reputation of each product.

22. That in view of the above position the impugned Valuation Ruling has been passed in violation of Section 24-A of the General Clauses Act which binds every authority, office or person in the following manner:-

(1) "Where, by or under any enactment, a power to make any order or give any direction is conferred on any authority, office or person such power shall be exercised reasonably, fairly, justly and for the advancement of the purposes of the enactment.

(2) The authority, office or person making any order or issuing any direction under the power conferred by or under any enactment shall, so far as necessary or appropriate, give reasons for making the order or, as the case may be, for issuing the direction and shall provide a copy of the order or, as the case may be, the direction to the person affected prejudicially."

However the impugned Ruling itself speaks loudly that the respondent Director has not acted fairly, reasonably, justly and for the advancement of the enactment stipulated in sub-sections (1), (5), (6), (7), (8) and (9) of section 25 of the Act.

23. That in a judgment, passed in CP NO. 2673 of 2009 and other connected Petitions, the Honorable Sind High court while dilating upon Section 25 and 25-A has laid down, at para 22, a golden principal as under;

"The principal method of determining customs Value is, and must remain, section 25. Section 25 A is not intended to be the substitute for section 25, nor can it be resorted to in such manner and with such frequency that it marginalizes the latter provision. It is merely an adjunct to section 25, to be resorted to in appropriate circumstances and for an appropriate period. In our view, in enacting section 25A, the legislative intent was not, nor could be for the reasons stated above, to create a statutory bypass to the valuation agreement. While the issuance of valuation rulings under section 25A cannot be regarded as limited only to those cases where the department concludes that there is group under invoicing, the section also cannot be used for the wholesale determination of customs Values. Such an approach would, in effect, transform the determination permissible under section 25A to an impermissible fixation of Value. This is an important point which must be kept in mind, and may be relevant in appropriate cases when considering the vires of a valuation ruling."

24. That the Director General valuation while deciding a review application No. 115/2008 dated 16.02.2009 on the somewhat identical issue has laid down a golden principal based on the true spirit of GATT Code of valuation in the following words:

"5. Rival parties have been heard and the case record examined. While provisionally assessing the Value of the goods, the concerning Collectorate (s) have ignored the direction of the Honorable Supreme Court of Pakistan in the case of M/s Zymotic Diagnostic International, CP No. 434-K/2005, wherein it has clearly been held that invoice price of an importer should not be rejected as a matter of routine. The operative para of ruling of Supreme Court is as under:-



"Section 25 of the Customs Act; authorize an officer of the customs department to reject the declared Value of a consignment imported in Pakistan and to assess the same. Section 25 lays down various modes in which the officials of the customs department are required to proceed in determining or assessing the Value of the consignment after rejecting the declared Value. However, for rejecting or refusing to accept the Value declared by a consignee in respect of imported goods the concerned officer is required to give cogent, plausible and satisfactory reasons. For non-acceptance of the declared Value and rejection thereof which cannot be proceed on the whims or desires of the officer of the customs."

25. That the Petitioner craves leave of this authority to urge further grounds at the time of hearing of review application.

P R A Y E R

26. In view of foregoing submissions, it is respectfully prayed that:

- i) Declare that the impugned Valuation Ruling No. 868/2016 dated 09.06.2016 is ultra vires of sub-section (9) of Section 25 of the Customs Act, 1969.
- ii) Declare that clubbing of all items of the world together and fixing their one Customs value for assessment purpose is not covered under Section 25 of the Customs Act, 1969. Hence, totally unlawful.
- iii) Declare that assessment of China origin Stationery items at the rate indicated in Annex-A is totally illegal and un-lawful.
- iv) Direct the learned Director to issue a new valuation Ruling in line with actual Transaction Value after associating the Petitioner.
- v) In the meantime direct the Clearance Collectorate to assess the Petitioner's goods provisionally under Section 81 of the Customs Act, 1969 by securing difference of value in accordance with superseded Valuation Ruling No.813/2016 dated 28.01.2016 viz-a-viz Transaction Value.
- vi) Any other relief deem fit under the circumstances.

27. The respondent department was asked to furnish comments to the arguments submitted by the petitioner in the case. The parawise comments by the department on the petition are given as under:

28. It was brought to the notice of this Directorate General of Customs Valuation that the values of various types of Stationery Items have considerably increased in the international market as compared to the determined Customs values of Stationery Items of different origins vide Valuation Ruling No.585/2013, dated 30-09-2013 and followed by corrigendum dated 01-11-2013. The impugned Valuation Ruling being considerably old required revision in line with the prevailing prices in the international market. Therefore, this Directorate General initiated an exercise for determination of customs value, for stationery items and meeting with stakeholders was held on 18-05-2016. The stakeholders were requested to bring up following documents to make the meeting fruitful.



- a) Invoices of imports during last three months showing factual value.
- b) Websites, names and E-mail addresses of known foreign manufacturers of the item in question through which the actual current value can be ascertained.

- c) Copies of Contracts made / LCs opened during the last three months showing the value of item in question.
- d) Copies of Sales Tax Invoices issued during last four months showing the difference in price (excluding duty and taxes) to substantiate that the benefit of difference in price is passed on to the local buyers.

29. The meeting was attended by different importers, local manufacturers and officers from field formations. The local manufacturers during the meeting, were of the view that the prices determined vide previous Valuation Ruling No.585/2013, dated 30-09-2013 were considerably low than the actual prices in the international market, and needed immediate revision upwards. They submitted various documents in support of their contention. They also contended that due to low values of different stationery items, they are unable to compete in the local market and requested to bring the values at par with correct international values. The importers could not contest the view point of local manufactures, and raised one significant objection that the difference in Customs values of raw pencil vis a vis normally imported pencils was kept very high in the previous Valuation Ruling. The parties were given three days to submit documentary proof in support of their contentions, but only a few documents from manufactures were received which were scrutinized. Later some importers also submitted certain documents, which have been carefully examined.

PARAWISE COMMENTS

30. Para-1: This para relates to introduction of the importer, so no comments required.

31. Para-2: Contested. Since, the previous Valuation Ruling No.585/2013, dated 30-09-2013, was considerably low and hence on lower side vis-a-vis the actual prices in the international market for the year 2016, it was necessary to re-determine the customs values afresh in the light of current price trends. For this purpose, Valuation Methods provided in Section 25 (1) to 25 (8) of the Customs Act, 1969, were exhausted and consequently, the customs values of different type of stationery were determined under section 25 (9) of the Customs Act, 1969.

32. Para-3: Denied. Meeting notice was issued to all stakeholders who had imported the subject goods during the last 90 days. Moreover, the representatives of importers i.e. FPCCI, Chamber of Commerce and respective association of the importer were also called. As regards, documents furnished by the petitioner could not be relied upon due to wide variation in valuation. Moreover, the local market inquiries conducted under Section 25 (7) of the Customs Act, 1969, suggests increase in prices and confirm that the prices of stationery items have increased substantially vis-à-vis old Valuation Ruling.

33. Para-4: Denied. Paragraph-5 of the impugned Valuation Ruling clearly reveals that Section 25 (1), (5), (6) and (8) were exhausted but due to the wide variation in values being declared to the Customs, these methods of valuation could not be implemented. As regards, local market inquiry it was conducted from open market of different areas of the city, and obviously included variations in prices, so Methods under Section 25 (9) was adopted for final determination of values.



34. Para-5-8: Denied. The simple reading of th Valuation Ruling transpires that the difference owing to origins has been duly incorporated in it. S the objections raised by the petitioners are void of any substance.

35. Para-9: This para is reproduction of a portion of Honourable Shindh High Court's judgment.

36. Para-10: This para is reproduction of order Director General Valuation in other case and does not relate with the issue in hand, where a Valuation Ruling is issue under Section 25A if the Customs Act, 1969 by following sequential order exhausted in Section 25 of the Act ibid.

37. Para-11: This para relates to further grounds at the time of hearing.

PRAYER

38. In view of submissions above, it is respectfully prayed that the instant petition, being devoid of merits, may kindly be rejected.

ORDER

39. The basic contention of the petitioners is that the values of the following items were increased on whims and against market reality. Generally the manufacturers also agreed that some prices have been fixed on higher side. They contended that values may be fixed after considering their contention.

40. S.No.1-3: Ink for Fiber Tip/Fine Liner and Ink for markers and ball pens:

This is raw material for manufacturing and not available in the market. Wrong market survey has been conducted. The manufacturers also endorsed the point of view.

41. S.No.9: Staple pins:

Importers are of the view that these are not manufactured in Pakistan and price has been raised exorbitantly more than its raw material. Even keeping LMB prices and manufacturing cost the price may be reduced. Manufacturers partially agreed and stated the prices may be reduced slightly.

42. S.No. 22,25,26,28 & 29: Ball points, highlighters, gel pens, fountain pens:

Importers are of the view that the prices have been fixed much on higher side and are available at much cheaper price in the market. They were ready to handover containers on this price to any buyer. Chinese pens are much cheaper than market inquiry. The manufacturers of the pens also endorsed their point of view and stated these may be reduced.

43. S.No.36-37: Caps for fountain pens:

Importers and manufacturers agreed that prices are high for this item.

44. S.No.38-39: Colour pencils:

Importers are of the view that the colour pencils are available at much cheaper price. They contended that price should be reduced to \$ 5.00/kg. Though manufacturers also agreed but stated it should be reduced marginally. The market inquiry showed that prices have been fixed a bit on higher side.



45. S.No.40: Crayon:
The importers and manufacturers both agreed that \$ 17/kg is too much and were surprised on this value. The importers said it should be around \$ 1.5 whereas manufacturers said the price may be fixed at between \$ 10 – 12/kg. The contention of importer is also not correct but this has been fixed on higher side. This is not genuine price and needs revision downward.
46. S.No.56, 63: Compass and Divider:
The importers contention was that same price has been fixed for both the items. It may be dealt separately. The manufacturers also agreed but %age of reduction differed by importers and manufacturers. The manufacturers of compass stated that price includes chrome plating, nut and labor so reduction may be nominal. However, both agreed to deal items separately.
47. S.No. 46, 47, 48, 49: Eraser Rubber:
Eraser Rubber should be increased as the basic raw material of rubber is available at \$ 1.00/kg as per manufacturer's contention. However, the importers opposed it and stated that the manufacturers of rubber are importing raw material at \$ 0.66/kg to \$ 0.98/kg. Most manufacturers stated that it is around \$ 1.00/kg. The value of rubber needs enhancement, however, value of raw material of rubber also needs to be fixed.
48. Keeping in view above discussion the values of the following items are fixed as under:

Table

S. No.	Description of goods	PCT	Proposed PCT for WeBOC	Origin	Customs Values (C&F) US\$
(1)	(2)	(3)	(4)	(5)	(6)
1	Ink for Fiber Tip Pens & Fine Liner Pens (water base)	3215.9010	3215.9010.1000	China	3.00 /Kg
				Other Origins	3.75 /Kg
3	Ink for Markers & Ball Pens.	3215.9010	3215.9010.1100	China	5.30 /Kg
				Germany, Japan, UK, USA	7.50 /Kg
				Other Origin	6.25 /Kg
9	Staple Pins All Sizes	8305.2000	8305.2000.1000	China/India	2.10 /Kg
22	Ball points Pens (Excluding Gel Pen and Roller Pen)	9608.1000	9608.1000.1000	China	0.11/pc



25	Highlighters	9608.2000	9608.2000.1200	China	0.19 /Pc
28	Fountain Pen with Plastic cap	9608.2000	9608.2000.1500	China	0.22 /Pc
29	Fountain Pen with Metal cap	9608.3000	9608.3000.1000	China	0.27 /Pc
36	Cap for Fountain Pen (Plastic)	9608.9910	9608.9910.1100	All Origins	4.00 /Kg
37	Cap for Fountain Pen (Metal)	9608.9910	9608.9910.1200	All Origins	10.00 /Kg
38	Color Pencils Half size	9609.1000	9609.1000.1000	China	8.20 /Kg
				Other Origins	11.00 /Kg
39	Color Pencils Full Size	9609.1000	9609.1000.1100	China	8.20 /Kg
				Other Origins	11.00 /Kg
40	Crayon	9609.1000	9609.1000.1200	China	9.00 /Kg
				Other Origins	11.50 /Kg
43	Black Lead Pencil without rubber Tip	9609.1000	9609.1000.1500	China	8.00/kg
				Germany, Japan, UK, USA	12.80/kg
				Other Origins	10.70/kg
44	Black Pencil with Rubber Tip	9609.1000	9609.1000.1600	China	8.20/kg
				Germany, Japan, UK, USA,	13.30/kg
				Other Origins	11.30/kg
46	Rubber Eraser	4016.9210 4016.9290	4016.9210.1000 4016.9290.1000	All origins	1.50/kg
47	Rubber Eraser Simple Plain Middle level	4016.9210 4016.9290	4016.9210.1100 4016.9290.1100	All origins	1.75/kg



	brands like Shari, Orbit etc.				
48	Rubber Eraser – Fancy (Assorted shapes, toys, Cartoons etc.)	4016.9210 4016.9290	4016.9210.1200 4016.9290.1200	All origins	3.45/kg
49	Rubber Eraser – (High end brands like Pelikan, Milan and Feber Castell, Staedler etc.)	8472.9090 4016.9290	8472.9090.1500 4016.9290.1000	All origins	4.25/kg
55	Compass	9017.2000	9017.2000.1000	China	0.16 /Pc
63	Divider	9017.2000	9017.2000.1200	China	0.14 /Pc

49. While fixing value of rubber, it was noticed that the value of raw material of rubber is on lower side and is being cleared between \$ 0.66/kg to \$ 0.98/kg and manufacturers themselves stated that the raw material is at \$ 1.00/kg. The Director Valuation may fix its value accordingly.

50. Being identical on facts and law points, this order shall apply mutatis mutandis to the following (30) petitions.

S #	Name of Petitioners
1.	M/s Feroze Corporation
2.	M/s Brothers Corp.
3.	M/s Sind Traders
4.	M/s M.M.Trading Co.
5.	M/s Zaid Ent
6.	M/s Sultan & Co.
7.	M/s Bahadur Industries
8.	M/s Real Enterprises
9.	M/s Amer Bros Stationeries
10.	Ms/ Selhi Int.
11.	M/s Crest Corp
12.	M/s S. S. International
13.	M/s Five Star Trading
14.	M/s Adil & Co.
15.	M/s Shark Stationeries
16.	M/s Maxi Inc.
17.	M/s Toray Plastic
18.	M/s Ahmad Ali Ent.
19.	M/s Asra Ent.
20.	M/s Qamar & Co.
21.	M/s Salim & Co.
22.	M/s Zubair & Co.
23.	M/s Global Pen Co.
24.	M/s S.M.Saeed & Co.
25.	M/s Brothers Corp.
26.	M/s King Pen Co.



27.	M/s Brother Pen Co.
28.	M/s Zainab Ent
29.	M/s Central Office Product
30.	M/s Stationary Box

(Signature)
27/7/16
(Syed Tanvir Ahmad)
Director General

Registered Copy to:

S #	Petitioner's Name
1.	M/s Dollar Industries
2.	M/s Feroze Corporation
3.	M/s Brothers Corp.
4.	M/s Sind Traders
5.	M/s M.M.Trading Co.
6.	M/s Zaid Ent
7.	M/s Sultan & Co.
8.	M/s Bahadur Industries
9.	M/s Real Enterprises
10.	M/s Amer Bros Stationeries
11.	Ms/ Selhi Int.
12.	M/s Crest Corp
13.	M/s S. S. International
14.	M/s Five Star Trading
15.	M/s Adil & Co.
16.	M/s Shark Stationeries
17.	M/s Maxi Inc.
18.	M/s Toray Plastic
19.	M/s Ahmad Ali Ent.
20.	M/s Asra Ent.
21.	M/s Qamar & Co.
22.	M/s Salim & Co.
23.	M/s Zubair & Co.
24.	M/s Global Pen Co.
25.	M/s S.M.Saeed & Co.
26.	M/s Brothers Corp.
27.	M/s King Pen Co.
28.	M/s Brother Pen Co.
29.	M/s Zainab Ent
30.	M/s Central Office Products C/O M/s Nadeem & Company, B-3, 2 nd Floor, Pak Chamber, West Wharf, Karachi
31.	M/s Stationary Box



Copy to:

1. Member (Customs), FBR, Islamabad.
2. Chief Collectors Customs Appraisement (South)/Enforcement, Karachi/