



GOVERNMENT OF PAKISTAN
DIRECTORATE GENERAL OF CUSTOMS VALUATION
7TH FLOOR, CUSTOM HOUSE
KARACHI

Phone: 021-99214144

C. No. Misc/01/2024-I/887

Dated: 02-09-2024

VALUATION RULING NO. 1904/2024

1. This Ruling shall be applicable until the same is rescinded or revised in terms of sub-section (4) of Section 25A of the Customs Act, 1969.
2. The revision petition against this Valuation Ruling can be filed, under Section 25D of the Customs Act, 1969 within 30 days before the Director General, Customs Valuation.
3. The values in valuation ruling shall be applicable to the given description and specification of goods.

Subject: DETERMINATION OF CUSTOMS VALUE OF CORIANDER SEED (SPLIT AND HUSK) UNDER SECTION 25A OF THE CUSTOMS ACT, 1969.

1.	Valuation Ruling	Fresh exercise to determine fair values of Coriander Seed (Split and Husk)
2.	Date of meetings with stakeholders	The meetings with relevant stakeholders were conducted on 29.08.2024.

3. **Background of the Issue:** The Directorate General of Customs Valuation received multiple representations from importers to determine values of Coriander Seed Split and Husk. Accordingly, in pursuance of analysis of import data, current market trends, the difference in market prices and customs values, an exercise for the determination of customs values of subject goods was initiated under Section 25 and 25A of the Customs Act, 1969.

4. **Analysis to determine Customs Values:** The importers contended that split coriander seeds typically have a lower value compared to whole coriander seeds. In general, split seeds, whether coriander, rice, or others, are priced lower than their whole counterparts. The importers mentioned that currently the subject goods are generally assessed at USD 0.35 per kg based on data from the past 90 days. They further explained that split coriander seeds are a byproduct of whole coriander seeds during the screening process. The whole seeds are sorted, and the split portions and husks are separated, with the split seeds being sold at significantly lower prices than the whole seeds. Furthermore, they explained that whole coriander seeds contain a kernel that holds the oil and aroma essential to the spice and recipe. In contrast, split seeds often lack the kernel, which diminishes their flavor and



effectiveness. They further contended that the customs values of subject item should be in conformity with the whole coriander seed by extending 40% discount.

5. **Method(s) adopted to determine Customs values:** Valuation methods, provided in Section 25 of the Customs Act, 1969, were applied in sequential order. The transaction value method as provided in sub-section (1) of Section 25 of the Customs Act, 1969, was found inapplicable as declared values did not correspond to market prices. Similarly, the data of identical and similar goods as per sections 25(5) & (6) *ibid* provided some references of demonstrable evidence of qualities and quantities of the same commercial level, however, it could not be solely relied upon. Meanwhile, a market enquiry as envisaged under Sub-Section (7) of Section 25 of the Customs Act, 1969 was also conducted as per procedure of Office Order No. 17/2014 dated 19-03-2014 wherein various wholesale and retail markets were visited and the actual prices of subject goods were acquired. As a result, after adjusting the amounts of profits, the C&F value was determined under Section 25(9) read with Section 25 (7) of the Customs Act, 1969 further read with customs rule 121(2) of the Customs Rules, 2001, which are as under:

6. **Customs values for Coriander Seed Split and Husk-hereinafter specified** shall be assessed to duty / taxes on the Customs values given against them in the Table below: -

Sr. No	Description of Goods	PCT Code	Proposed PCT Code for WeBOC	Origin	Customs Values (C&F) (USD/Kg)
(1)	(2)	(3)	(4)	(5)	(6)
1.	Coriander Seed (Split and Husk)	0909.2100	0909.2100 .1000	All origins	0.50

Note: Reduction of 10% shall be admissible on total of above value on account of freight charges, if goods are imported through land route.

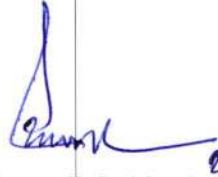


7. In cases, where declared values or values in invoice retrieved from the consignment, as the case may be, are higher than the customs values determined in this valuation ruling, the assessment shall be made on higher values in terms of sub-section (1) of Section 25 of the Customs Act, 1969.

8. In case of consignments imported by air, the difference between air freight and sea freight shall be added for the assessment of value.

9. The VR shall be applicable for the description and specifications of goods as mentioned in the aforementioned table. HS Codes are mentioned for illustrative purposes.

10. The Collectorates of customs shall ensure the implementation of VR and in case of any anomaly may be brought to the notice of this Directorate immediately.


(Sanaullah Abro) 2/9/24
Director

Copy for necessary action and implementation:

The Collectors / Directors of Customs, Collectorates / Directorates of Customs (Appraisalment-West / East / SAPT / PMBQ / JIAP / Enforcement/), Karachi / Hyderabad / (Appraisalment / Enforcement / Ports), Quetta / Gwadar / Khuzdar (Appraisalment / Enforcement / AHA), (Appraisalment-East / West, Lahore / Faisalabad Appraisalment / Enforcement, Sargodha / Enforcement & Appraisalment, Sambrial (Sialkot) / Enforcement, Multan / Islamabad / Gilgit-Baltistan / (Appraisalment/ Enforcement), Peshawar / Enforcement, Dera Ismail Khan / Exports (Port Qasim/Custom House, Karachi) / Transit Trade, Karachi.

Copy for information:

- 1) The Member Customs (Operations), F.B.R., Islamabad.
- 2) The Director General, Customs Valuation, Custom House, Karachi.
- 3) All Chief Collectors / Director Generals of Customs, Karachi / Lahore / Islamabad / Quetta / Peshawar.
- 4) All Collectors / Directors of Customs, Karachi / Lahore / Islamabad/ Quetta/ Peshawar/ Faisalabad.
- 5) The Director, Directorate of Customs Valuation, Lahore / Quetta / Peshawar.
- 6) The Deputy Director (MIS), Directorate General of Customs Valuation, Karachi, for uploading in One Customs & WFOC database system.
- 7) The Chairman (Valuation Committee), FPCC&I, Federation House, Clifton, Karachi.
- 8) The Chambers of Commerce & Industry, Karachi, Lahore, Islamabad, Hyderabad, Quetta & Peshawar.
- 9) The Karachi Customs Agents Group, Bohri Road, Karachi.
- 10) The Webmaster, Federal Board of Revenue, Islamabad.
- 11) Guard File.