GOVERNMENT OF PAKISTAN
DIRECTORATE GENERAL OF CUSTOMS VALUATION
7TH FLOOR, CUSTOM HOUSE, KARACHI
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C. No. Misc/55/2011-II/59 Dated: 20-01-2026

VALUATION RULING NO. 2039 / 2026

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 This Ruling shall be applicable until the same is rescinded or revised in terms of sub-section (4) of Section 25A of the Customs Act, 1969.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.

Subject: **DETERMINATION OF CUSTOMS VALUE OF MASTER BATCHES (ALL TYPES / BRANDS) FORM UNDER SECTION 25A OF THE CUSTOMS ACT, 1969.**

1.	Valuation Ruling	This Ruling supersedes earlier Valuation Ruling No. 1212/2017 dated 22.10.2017.
2.	Date of meeting with stakeholders	The meeting with relevant stakeholders was conducted on 24.12.2025.

Background of the Issue: The customs values of Master Batches were earlier determined vide Valuation Ruling No. 1212/2017 dated 22.10.2017. The said Valuation Ruling was challenged by M/s Standard Enterprises through a revision petition filed under Section 25D of the Customs Act, 1969, which was decided vide Order-in-Revision No. 17/2018 dated 22.06.2018, whereby the Valuation Ruling was upheld. Subsequently, M/s Standard Enterprises filed an appeal before the Hon'ble Customs Appellate Tribunal, which, vide judgment dated 19.10.2018, excluded the brand *"Cabot"* from the scope of the said Valuation Ruling. No reference was filed against the said judgment. The Directorate notes that valuation under Section 25A of the Customs Act, 1969 is time-sensitive and market-dependent, requiring periodic review and re-determination. The earlier Valuation Ruling had remained in force for more than eight (08) years. Furthermore, fresh representations were received from stakeholders, including M/s Pinnacle Fiber (Pvt.) Ltd., regarding valuation of Master Batches. In view of the lapse of time, evolving international market conditions, updated import data, and fresh stakeholder representations, the Directorate initiated a fresh and independent determination of customs values under Section 25A of the Customs Act, 1969. It is clarified that the present determination is not a continuation of the earlier Valuation Ruling, nor restricted by any brand-specific exclusion made therein, and has been carried out independently on the basis of current facts and data.

DIRECTOR CUSTOMS VALUATION KARACHI

2. Analysis/Exercise done to determine Customs Values: A meeting for determination of customs values of Master Batches was held on the aforesaid date and was attended by representatives of importers and local manufacturers. The viewpoints of all stakeholders were heard in detail. The representative of M/s Standard Enterprises, an importer of Master Batches of a particular brand, submitted that the declared values of their imports reflected actual transaction values and furnished Goods Declarations, sales tax returns, copies of LCs along with proforma invoices for the period August to October 2025. However, export Goods Declarations from the country of export were not submitted, thereby limiting verification of transaction values under Section 25(1) of the Customs Act, 1969. On the other hand, representatives of local manufacturers submitted that the primary raw material (pigment) used in the manufacture of Master Batches is imported from M/s Cabot

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(China) at prices ranging between US$ 2.80 to 3.00 per kg, constituting approximately 50% of the finished product. They further submitted that resin, valued at approximately US$ 1.10 to 1.20 per kg, constitutes around 40%, in addition to wax and heat stabilizers. The manufacturer representatives contended that the declared import values of certain consignments appeared inconsistent with prevailing international prices and underlying cost structures. The written representation submitted by M/s Pinnacle Fiber (Pvt.) Ltd. regarding lower valuation of recycled master batches was also discussed. The contention was opposed by manufacturer representatives, who submitted that prime master batches are imported at the import stage and are subsequently used in recycling processes, and therefore no separate or lower valuation at the import stage is justified. No documentary evidence was produced to establish a distinct valuation mechanism for recycled master batches. All stakeholders were advised to submit documentary evidence, technical literature, cost data, and written arguments in support of their respective submissions.

For the purpose of valuation, import data was retrieved and examined. The data reflected limited comparable imports, inconsistent nomenclature, and wide variation in declared values.

3. Method(s) adopted to determine Customs values: Valuation methods specified in Section 25 of the Customs Act, 1969, were duly applied in sequential order to arrive at the Customs values of subject goods. The transaction value method as provided in sub-section (1) of Section 25 of the Customs Act, 1969, was found inapplicable due to absence of information as required under sub-section (2) of Section 25 of Customs Act, 1969. Therefore, identical and similar goods value methods provided in Section 25(5) and 25(6) were examined for applicability to determine Customs values of subject goods. However, it was found that the same could not be solely relied upon due to limited imports and different nomenclature used by importers. The applicability of market inquiry under Section 25(7) was also examined. However, the subject goods are specialized industrial inputs, not ordinarily sold in the domestic market in the same condition as imported, and therefore reliable and contemporaneous domestic market prices at the import stage were not available for meaningful comparison. The computed value method under Section 25(8) was also found inapplicable due to the absence of credible and verifiable information regarding manufacturing costs, overheads, and associated expenses in the country of export. Accordingly, the customs values of the subject goods have been determined under Section 25(9), read with Sections 25(6) of the Customs Act, 1969.

DIRECTOR CUSTOMS VALUATION KARACHI

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4. Customs Values for Master Batches (All types / brands) - *hereinafter specified* shall be assessed to duty / taxes at following Customs Values:

Sr. No.	Description of goods	PCT	Proposed PCT for WeBOC	Origin	Customs Values C&F (US$/Kg)
1	Master Batches (White Colour)	3206.4910	3206.4910.1000	All Origins	3.25
2	Master Batches (Black Colour)		3206.4910.1100		2.53
3	Master Batches (All others Colours)		3206.4910.1200		7.75

5. The values determined in this Valuation Ruling shall be treated as minimum benchmark values. 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.

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

7. The Valuation Ruling shall be applicable for the descriptions and specifications of goods as mentioned in the aforementioned table. HS Codes are mentioned for illustrative purposes.

8. The Collectorates of Customs shall ensure the implementation of Valuation Ruling and in case of any anomaly may be brought to the notice of this Directorate immediately.

20/1/26

(Azhar Husain Merchant)
Director

Copy for necessary action and implementation:
The Collectors / Directors of Customs, Collectorates / Directorates of Customs (Headquarters-South)/ Appraisement-West / East / SAPT / PMBQ / JIAP / Enforcement/), Karachi / Hyderabad / (Appraisement / Enforcement / Ports), Quetta / Gwadar / Khuzdar (Appraisement / Enforcement / AIIA), (Appraisement–East / West, Lahore / Faisalabad Appraisement / Enforcement, Sargodha / Enforcement & Appraisement, Sambrial (Sialkot) / Enforcement, Multan / Islamabad / Gilgit-Baltistan / (Appraisement/ 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 &WEBOC 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.

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