



Study on Timeline of Export and Import of Containers through JNPT

December 2016



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Introduction

For a developing country of India's size and potential, undertaking trade facilitation reforms is an urgent need today to match pace with the growing global trade. This requires simplification and harmonization of procedures in order to reduce the time and cost taken for trading across borders.

With India's ratification of WTO's Trade Facilitation Agreement (April, 2016), there is an extended onus on the government for identifying action areas in order to simplify trade procedures and the associated time and cost. Various steps have been undertaken for this -

there are fewer restrictions on foreign direct investment, tax holidays are given to developers, public-private partnerships (PPPs) are promoted for infrastructural projects and the Single Window for Trade Facilitation (SWIFT) has been launched by the Central Board of Excise and Customs (CBEC). It is also estimated that there is a requirement of around USD 1 trillion towards infrastructural investment in India during the 12th Five Year Plan period, 2012-2017, to maintain India's growth trajectory. With Indian economy on an exponential growth curve and Indian government's strong inclination to enhance trade and investment, foreign companies are turning to India for emerging market deals. At a point when the world is tending towards India, the country is likely to witness an increasing flow of rail, road and port traffic.

Parameter/Year	2015	2016	2017
Overall ranking	134	131	130
Trading Across Borders	126	144	143

Parameter	Time to Export (Hours)		Time to Import (Hours)	
	Documentary Compliance	Border Compliance	Documentary Compliance	Border Compliance
2016	61	88	67	311
2017	58	85	65	307

Source: www.doingbusiness.org

However, India's performance in World Bank's Ease of Doing Business Report has only shown a marginal improvement over the last few years (Table 1). Further, Table 2 shows the time to export and import through Mumbai, Maharashtra, as represented in the World Bank Doing Business Report (2017).

This report undertakes a comprehensive and analytical study of the various procedures and agencies involved in the supply chain for export and import through JNPT. It involves an analytical assessment of the time taken at various intervention points - dissecting the dwell time of containers from/to Container Freight Stations (CFS), Inland Container Depot (ICD) as well as Direct Port Entry/Delivery – entailing transportation of containers and other operational aspects, the process of assessment, registration and examination, among others. Further, the role of partner government agencies (PGAs) and shipping lines in the process have also been analysed.

Year	Port	Customs Clearance	Clearance at the Gate
2015-16	103	3	2
2016-17 (Target)	80	24	-

Year	Port	Railway	Customs Clearance	CFS
2015-16	44	91.2	115	152
2016-17 (Target)	30	36	30	120

The report also acts as a benchmarking tool for the targets for 2016-17 – for export and import (as summarised in Table 3 and Table 4) – set in the meeting held on August 12, 2016 under the chairmanship of the CEO, NITI Aayog to build consensus regarding the role and responsibility of each ministry/agency to finalise Port Ecosystem efficiency parameters.

Objectives

1. To track supply chain of import/export at JNPT through identification of all the procedures, agencies and stakeholders
 - ✓ Inclusive of all formats of port entry and delivery such as Direct Port Delivery, Direct Port Entry, CFS facilitated, Factory stuffed and ICD facilitated through rail, etc.
2. To calculate the time taken for import and export of Containers through JNPT on a monthly basis.
3. To specifically identify dwell time at various agencies in the process. These would include, but not be restricted to, the following:

Border Compliance

- ✓ Customs Clearance and Inspections: Time taken by the Customs for export and import clearances.
- ✓ Port Handling: Time taken by Terminal, CFS's and ICD's for export and import.
- ✓ Allied Agencies: Time taken by agencies such as FSSAI, PQ, etc. during the course of import and export.

Documentation Compliance

- ✓ Time taken to obtain, prepare and submit documents required during export and import but not to be restricted to Clearance, Inspection, Port Handling, etc.
4. Parking lots and Port gate: Time taken for entry and exit through these areas
 5. Data from various agencies would be collected and analyzed to calculate the time taken for movement of export & import containers from JNPT.
 6. Identification of action areas and measures for reducing dwell time during the course of export and import of containers from JNPT aiming to meet specified Government targets:
 - ✓ Procedure-wise area of intervention
 - ✓ Stakeholder-wise area of action
 7. To critically analyze the various stages in the export and import cycles with a view to reduce the dwell time at each stage, with the principal aim of facilitating the reduction in export and import cycles from the current stage to the targets set by the government. Stage wise approach in terms of reaching the target will be suggested.
 8. To analyze the transaction cost borne by the trade at each stage, with a view to mobilize reduction of the same
 9. To provide incisive insights and recommendations on the improvement areas at various stages of the value chain, with focus on improving operations and reducing delays

Stakeholders

1. **Customs Broker:** Also known as Customs House Agent (CHA), a customs broker is a representative or an agent of the importer/exporter, and prepares and submits documents for clearing goods through Customs. He/she holds a customs licence for practise and is well versed with customs rules, regulations and tariffs.
2. **Customs:** It is the official department of the government with the authority to check goods and travellers. In international trade, the customs department collects duty on imported goods as levied by the government, and provides requisite clearances for both export and import goods.
3. **Container Freight Station (CFS) and Inland Container Depot (ICD):** A container freight station is an extension of the port. It is the custodian of goods after they are cleared from the terminal. The process of customs clearance takes place inside the CFS.
4. **Port/Terminal:** A port is the point of entry of goods and travellers into the country. It provides facilities for berthing of vessels, and loading/unloading of cargo. A terminal is part of the port wherein different berths may be a part. It may be cargo-specific or designed to handle all types of cargo.

5. **Shipping Line:** A shipping line is a company that operates fleet of ships which transport cargo to different parts of the world. While most shipping lines are owners of the containers they carry, some lines lease the same from an external organisation.

Methodology

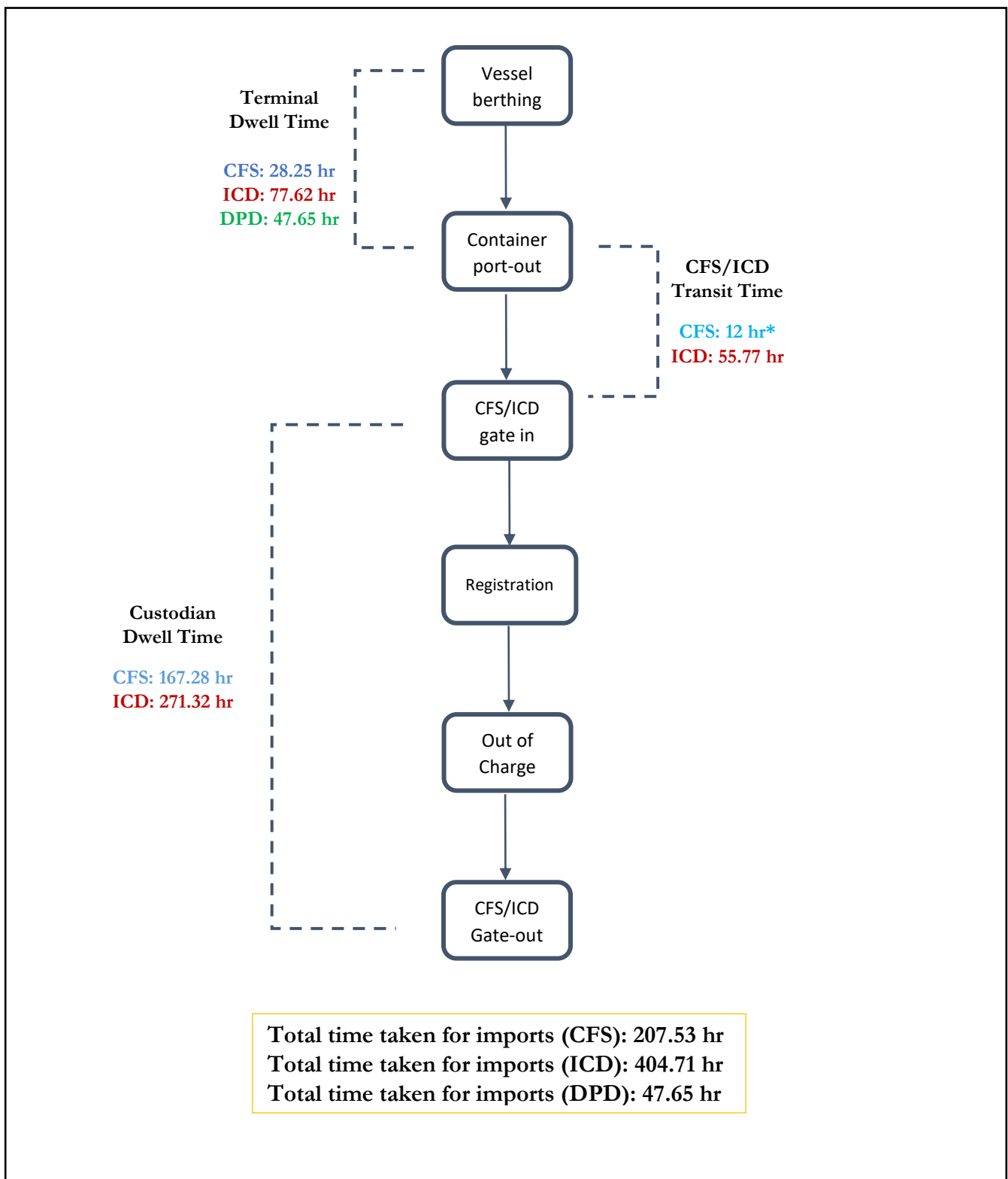
1. **Preliminary assessment** of parameters related to border compliance and documentary compliance at JNPT
2. **Data collection** from stakeholders such as terminal operators, customs – Jawaharlal Nehru Customs House (JNCH) and ICD Tughlakabad, CFS operators and CONCOR
3. **Data analysis** entailing the process of data cleaning and analysis of the collected data through SAS, STATA and MS Excel. It would entail stakeholder-wise calculation of dwell time and finally, consolidation of the same in the process chain of EXIM trade
4. **Report** preparation describing average timelines for export and import value chains, and qualitatively indicating areas of improvement. The following parameters have been considered during analysis and report preparation:
 - a. Out of the total number of containers imported and exported at JNPT, the sample size considers the containers under the import and export category and not the containers meant for transshipment. Further, only Full Container Load (FCL) containers have been considered for this study.
 - b. The time in the tables is recorded in the hour format that is $[h]:mm:ss$. However, in the figures and charts, it is recorded in a decimal format. For example, a time of 04:30:00 recorded in a table is represented as 4.5 hours in the chart.
 - c. The total time taken in each agency is calculated as the average time taken from the first process at the agency to the final process (and not as a linear addition of time consumed in all processes recorded at an agency, as it may lead to inflated overall dwell time).

Limitations of the study

- a. **Transit time calculation for port to CFS:** Due to issues faced in determining unique container numbers, it was difficult to calculate transit time. Hence, based on observation and various previous researches conducted, we have used an average time of 12 hours as transit time for CFS.
- b. **Missing entries in data sets:** Many entries in the data sets were missing or not recorded by the agencies. For instance, out of 12 CFS, only 3 CFS recorded the time of shipping line delivery order.
- c. **Data error:** At a number of agencies, data errors were recorded. For instance, at certain CFS', the gate-out time was before the gate-in time. Further, duplication of data was observed in the data provided by the PGAs.

IMPORT

Figure 1: Import process from JNPT



*assumed due to data error

** Inclusive of the assumed time

#weighted average from table 4 for all three categories

1. Import Process

The import cycle starts from shipping line filing an Import General Manifest (IGM), electronically in the ICES, 72 hours prior to arrival of the vessel at port, to the time the goods are out for delivery from a CFS, ICD or through DPD. In between, various processes take place and a minimum of five agencies play a role, which can be assessed in terms of terminal dwell time, road/rail transit time, customs release time and custodian (CFS/ICD) dwell time (Figure 1 above). Apart from this, in the overall process of imports, the time taken by the shipping line and the partner government agencies (PGAs) has also been calculated.

1.1. Terminal Dwell Time

Terminal dwell time is the calculation of the time a container is at the terminal. It is calculated as the average time taken from berthing of vessel to the time of container evacuation from port gate. Terminal dwell time varies with respect to the destination of the container – Container Freight Station (CFS), Inland Container Depot (ICD) or Direct Port Delivery (DPD) to importer.

The total dwell time of container at Jawaharlal Nehru Port Container Terminal (JNPCT), Gateway Terminal International Container Terminal (GTICT), Nava Sheva International Container Terminal (NSICT) and Nava Sheva International Gateway Terminal (NSIGT) is close to 37.10 hours, 36.72 hours, 39.32 hours and 53.66 hours respectively. Further categorisation of containers is given in Table 5 and Table 6. The detailed process is recorded in annexure 1.1. In case of DPD, the dwell time of the container at the terminal is its total time taken for import.

Parameter	JNPCT (n)	GTICT (n)	NSICT (n)	NSIGT (n)
Total number of import containers	36,714	47,679	13,542	13,222
Number of CFS bound containers	28300 (77.08%)	36,282 (76.10%)	9,916 (73.22%)	9,351 (70.72%)
Number of ICD bound containers	6,973 (18.99%)	9,533 (19.99%)	2,983 (22.03%)	3,370 (25.49%)
Number of Direct Port Delivery (DPD)	1,441 (3.92%)	1,864 (3.91%)	643 (4.75%)	501 (3.79%)

Note: Figures in the bracket give the percentage share

Parameter	JNPCT			GTICT			NSICT			NSIGT		
	CFS	ICD	DPD	CFS	ICD	DPD	CFS	ICD	DPD	CFS	ICD	DPD
Average dwell time (vessel berthing to container out of port) (hr)	28:04:47	73:34:20	37:57:25	26:05:46	74:08:50	52:22:25	26:16:15	81:36:33	44:38:12	39:17:46	92:21:36	61:55:24
Average terminal dwell time (hr)	37:06:28			36:43:51			39:19:57			53:40:42		
Average port dwell time (hr)	39:11:17											

1.2. Transit Time - CFS and ICD

Transit time is the time taken for the container to reach the custodian - which can either be a CFS or an ICD. The rail transit time for ICD is calculated as the difference between the time of loading on rail to the arrival (gate-in) of the container at the ICD (Table 7). The CFS transit time is taken from the time of exit of a container from port to its arrival (gate-in) at the CFS. This time is calculated on the basis of field observation.

Parameter	CFS	ICD Tughlakabad
Average time taken (hr)	12*	55.77
* assumed		

1.3. Customs Release Time

1.3.1. Jawaharlal Nehru Customs House (JNCH)

Customs release time is the time taken by the customs authorities, be it at the dock, at CFS or at ICD, to give Out-of-Charge (OOC) to a bill of entry for delivery of container(s) to the importer. It is calculated as the average time between submission of bill of entry to assessment and registration of goods to OOC (in case of RMS and Group B/E) and registration of a container to assessment and duty payment to OOC (in case of Group (First Check) B/E). It must be noted that the process of customs release is not linear; many agencies play a parallel role such as the PGAs, the importer/customs broker for duty payment, shipping line and the CFS. The total number of bills of entry received for all the categories have been summarised in Table 8.

	RMS	Group	Group (First Check)
Number of B/Es	60,438 (52.5%)	49,580 (43%)	5,135 (4.5%)
Submission of B/E to Assessment (hr)	0:30:48 (n=60,438)	41:44:34 (n=49,560)	
Registration to Examination of Goods (hr)		15:27:45 (n=41,293)	18:44:36 (n=5,022)
Examination to Out of Charge (hr)		1:29:50 (n=41,310)	
Registration of Goods to Out of Charge (hr)	15:26:48 (n=60,185)	15:33:25 (n=49,533)	
Examination to Assessment (hr)			70:44:33 (n=4,984)
Duty Payment to Out of Charge (hr)			10:56:19 (n=4,544)
Total time (hr)	15:56:52	57:17:59	100:25:27
Total Customs Release Time at JNCH (hr)= 37.51			

1.3.2. Customs at ICD Tughlakabad

Once a container is received at ICD Tughlakabad, the customs release time starts from assessment till out of charge is given. The total number of inward B/E to ICD is 15,703 (Table 9).

	RMS	Group	Group (First Check)
Number of B/Es	7,857 (50.1%)	6,344 (40.4%)	1,502 (9.5%)
Submission of B/E to Assessment (hr)	0:28:45 (n=7,864)	39:43:36 (n=6,428)	

Registration to Examination of Goods (hr)		11:06:12 (n=6,341)	24:58:02 (n=1,555)
Examination to Out of Charge (hr)		2:42:08 (n=6,344)	
Registration of Goods to Out of Charge (hr)	5:28:58 (n=7,857)	13:14:21 (n=6,436)	
Examination to Assessment (hr)			36:21:49 (n=1,515)
Duty Payment to Out of Charge (hr)			8:30:56 (n=1,502)
Total time (hr)	5:57:43	52:57:58	69:50:48
Total Customs Release Time at ICD TKD (hr)= 31.05			

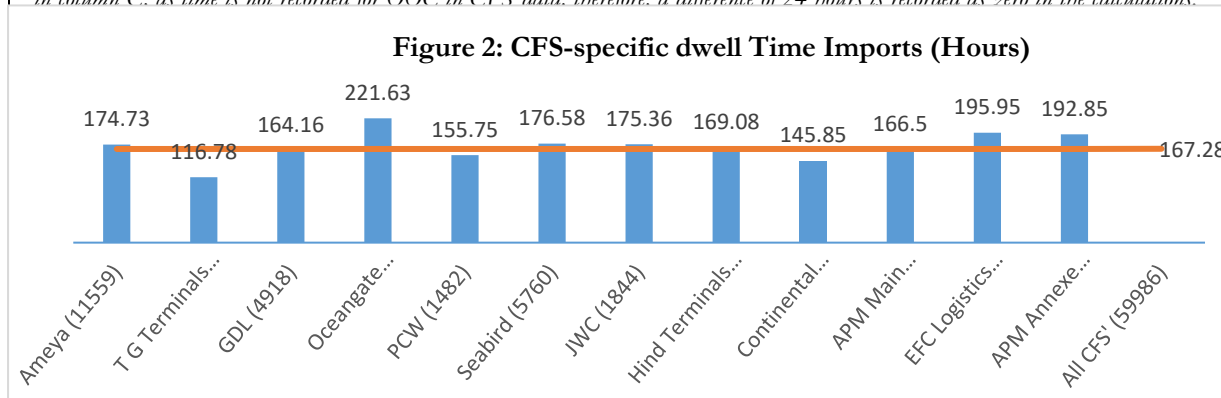
1.4. Custodian Dwell Time

1.4.1. CFS Dwell Time

CFS dwell time is calculated from the time of gate-in of a container at the CFS to gate-out from the CFS. In the analysis, data from 12 CFS has been analysed (Figure 2 and Table 8.1 – Annexure 1.3). The total average time taken by all CFS (12 could be included) is also given in Table 10. CFS specific dwell time for 12 CFS at JNP is given in figure 2. Please note that the total time taken by CFS is calculated in terms of gate-in to gate-out (and not as a linear addition of time taken in the various processes) due to the sample size being different for each process and many parallel processes involving customs, customs brokers and shipping line taking place.

	A	B	C	D
CFS (12 CFS' n=61,724)	Average time taken from gate-in to seal cutting	Average time taken from seal cutting to OOC	Average time taken from OOC to Gate-out#	Total (Gate-in to gate out)*
Total	111:52:46	93:24:19	39:12:05	167:17:50

* D should be taken as the true representation of the overall CFS dwell time. However, column D should not be seen as summation of columns A, B and C because the number of entries for A,B and C is not same.
#in column C, as time is not recorded for OOC in CFS data, therefore, a difference of 24 hours is recorded as zero in the calculations.



1.4.2. Container Corporation (CONCOR) - Tughlakabad Dwell Time

The dwell time for CONCOR is calculated from discharge of the container from the port to its gate out from CONCOR. Please note that this time taken by CONCOR is inclusive of the time taken by customs (Tughlakabad) to release the containers (Table 11).

Table 11: CONCOR Dwell Time			
	A	B	C
CONCOR -ICD Tughlakabad (n=4,432)	Average time taken from arrival at ICD to OOC	Average time taken from OOC to Gate-out	Total (Arrival gate out)
Total	224:38:35	47:04:22	271:19:32
<i>*C is not the sum of A and B because of the inconsistent sample size in the data set at each step. Therefore, C should be taken as the true representation of the overall ICD dwell time</i>			

1.5. Other Supporting Agencies

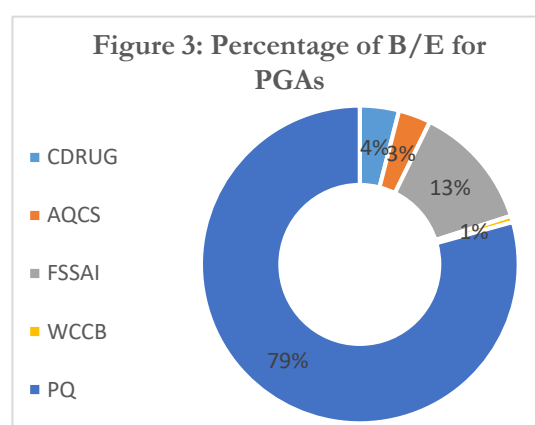
1.5.1. Shipping Line - Delivery Order

The shipping line provides delivery order (DO) as a final confirmation for delivery of cargo to the customs broker. Any delay by the shipping line in providing delivery order gets added to the total dwell time of the container at CFS/ICD. Some DOs are given after issue of OOC by customs, while others are generated at the same time or prior to OOC (Table 12). It may be noted that the average time taken for receiving a delivery order from arrival of a container at CFS is approximately 150.22 hrs.

Table 12: Average Time Taken for generation of Delivery Order by Shipping Line	
Total no. of DO	10321*
No. of DO prior to OOC	3,857
No. of DO given post OOC	1846
No. of DO received on same day as OOC	4618
Average time taken from CFS gate-in to receiving delivery order	150:13:49
<i>*this data is provided by only 3 CFS' (out of 12), therefore the number reflected here is lower than the actual number of containers going to the CFS from both terminals in table 3</i>	

1.5.2. Partner Government Agencies (PGAs)

Partner government agencies (PGAs) are the allied agencies that are required to examine and provide clearance to certain types/categories of cargo. They play a key role in the overall process of cargo clearance. In an earlier practise, the time required by these agencies was added in the customs release time, however, some cargo (particularly perishable) is now released before the arrival of report by PGAs on the basis of a bond guarantee. While the time taken by these agencies may not add to the overall dwell time, it is important to note that some agencies take as much as 14 days to publish reports despite initiation of SWIFT in April, 2016. This report analyses the time taken from sample collection to publishing of report by five PGAs- Drug controller (CDrug), Animal Quarantine(AQ), Wildlife Crime Control Bureau (WCCB), Food Safety and Standards Authority of India (FSSAI) and Plant

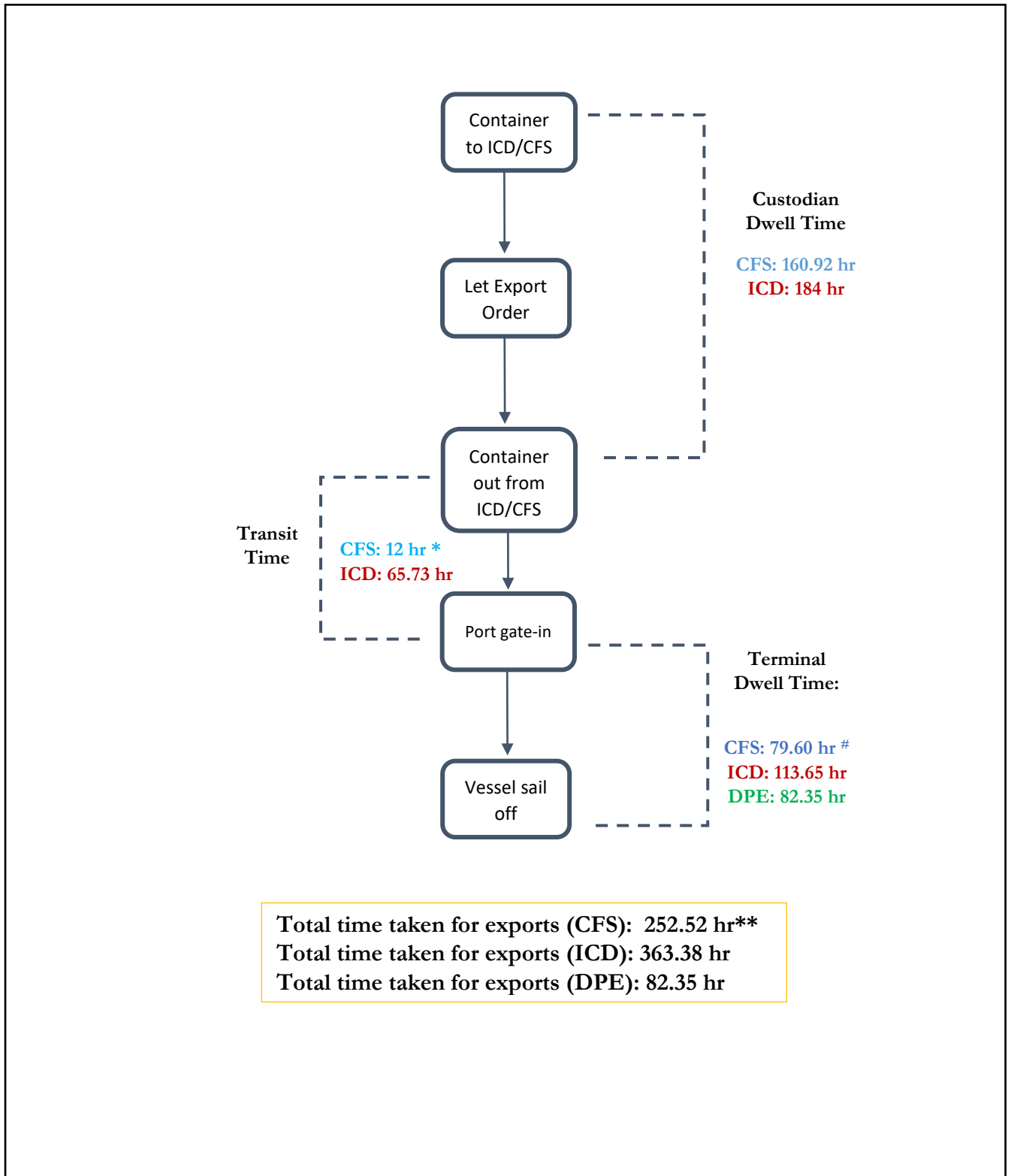


Quarantine (PQ) (Table 13). Please note that the reports for some agencies like PQ and FSSAI may also be received after out-of-charge due to nature of the cargo.

Table 13: Average Time Taken by PGAs, December 2016					
	CDRUG	AQCS	WCCB	FSSAI	PQ
Total number of B/E (n)	1791	1478	291	5,740	35,637
Time taken from sample collection to report publishing (hr)	98:17:28	138:52:05	112:44:07	338:12:30	178:53:08

EXPORT

Figure 4: Export process from JNPT



*assumed due to data error

** Inclusive of the assumed time

#weighted average from table 17 for all three categories

2. Export Process

The export cycle starts from filing of shipping bill to vessel sail off. In between, various processes take place and a minimum of five agencies play a role, which can be assessed in terms of terminal dwell time, road/rail transit time, customs release time and custodian (CFS/ICD) dwell time (Fig. 4).

2.1. Customs Release Time

2.1.1. Jawaharlal Nehru Customs House (JNCH)

Customs release time is calculated from the time of registration of goods in the customs system to the generation of Let Export Order (LEO) at JNCH.

Table 14: JNCH Dwell Time for Exports for December 2016	
Total no. of Shipping Bills (n)	1,37,691
Average time taken from Registration of goods to issuance of LEO (hr)	3:41:32

2.1.2. Customs ICD Tughlakabad

Customs ICD Tughlakabad dwell time is calculated from registration of goods in the customs system to issuance of LEO at the ICD.

Table 15: Customs ICD Tughlakabad Dwell Time for Exports for December 2016	
Total no. of shipping bill	
Average time taken from registration to issuance of LEO (hr)	15:50:11

2.2. Custodian Dwell Time

2.2.1. CFS Dwell Time

CFS dwell time is calculated from the issue of export carting order to gate-out of container from CFS. Shipping bill is not taken as a starting point for this activity because some S/Bs are filed prior to export carting, while others are filed post export carting order (figure 5).

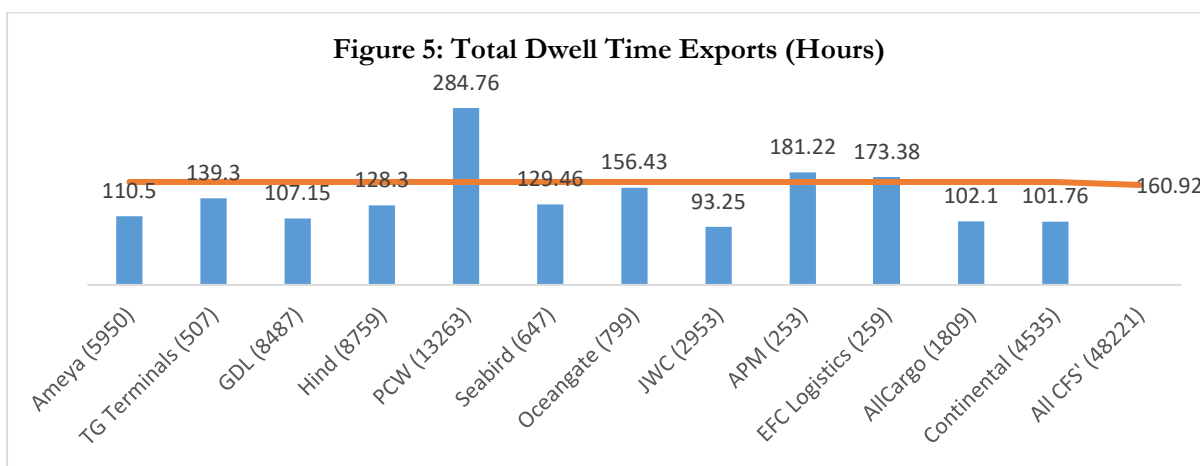


Table 16: CFS Specific Dwell Time for December 2016				
	A	B	C	D
CFS (12 CFS' n= 50,372)	Average time taken from Export Carting Order (ECO) to container stuffing	Average time taken from container stuffing to movement order	Average time taken from movement order to gate out	Total (ECO to gate out)*
Total	141:43:31	19:33:30	7:26:46	160:55:00
<i>* D should be taken as the true representation of the overall CFS dwell time. However, column D should not be seen as summation of columns A, B and C because the number of entries for A,B and C is not same</i>				

2.2.2. CONCOR (ICD Tughlakabad)

CONCOR dwell time is calculated from gate-in of a container at CONCOR to its arrival at the port.

Table 17: CONCOR (Tughlakabad) Dwell Time			
	A	B	C
ICD (n= 1,001)	Average time taken from container arrival at ICD to putting of customs seal (hr)	Average time taken from putting of customs seal to container loading on wagon (hr)	Total time taken from container arrival at CONCOR to loading on wagon*
Total	171:31:10	12:28:59	184:00:10
<i>* C should be taken as the true representation of the overall CONCOR dwell time. However, column C should not be seen as summation of columns A and B because the number of entries for A and B is not same</i>			

2.3. Transit Time - CFS and ICD

Export transit time is the time taken for the container to reach the port. The rail transit time for ICD is calculated based on the difference between the time of loading on rail to the arrival (gate-in) of the container at port (Table 18). The CFS transit time is taken from the time of exit of a container from CFS to its arrival (gate-in) at the port. This time is calculated on the basis of field observation.

Table 18: Transit time of Export Containers to JNPT for December 2016		
Parameter	CFS	ICD Tughlakabad
Average time taken (hr)	12*	65.73
<i>* assumed</i>		

2.4. Terminal Dwell Time

Terminal dwell time is calculated as the time taken from arrival of container at the port to the time of vessel sail off.

Table 19: Categorisation of Export Containers for December 2016				
Parameter	JNPCT (n)	GTICT (n)	NSICT (n)	NSIGT (n)
Total number of export containers	28,217	36,060	9,770	10,005
Number of containers from CFS	8,753 (31.02%)	10,548 (29.25%)	-	-
Number of containers from ICD	2,984 (10.58%)	5,135 (14.24%)	1,960 (20.06%)	2,388 (23.87%)
Number of Direct Port Entry (DPE)	16,480 (58.40%)	20,377 (56.51%)	7,810 (79.94%)	7,617 (76.13%)

Note: 1) The containers from NSICT and NSIGT has been classified into ICD and GATE. The GATE containers have been taken as DPE for analysis
 2) For GTICT, DPE includes both Factory Stuffed and ICD by Road as has been reported

Table 20: Step-wise Dwell Time Of Export Containers for December 2016

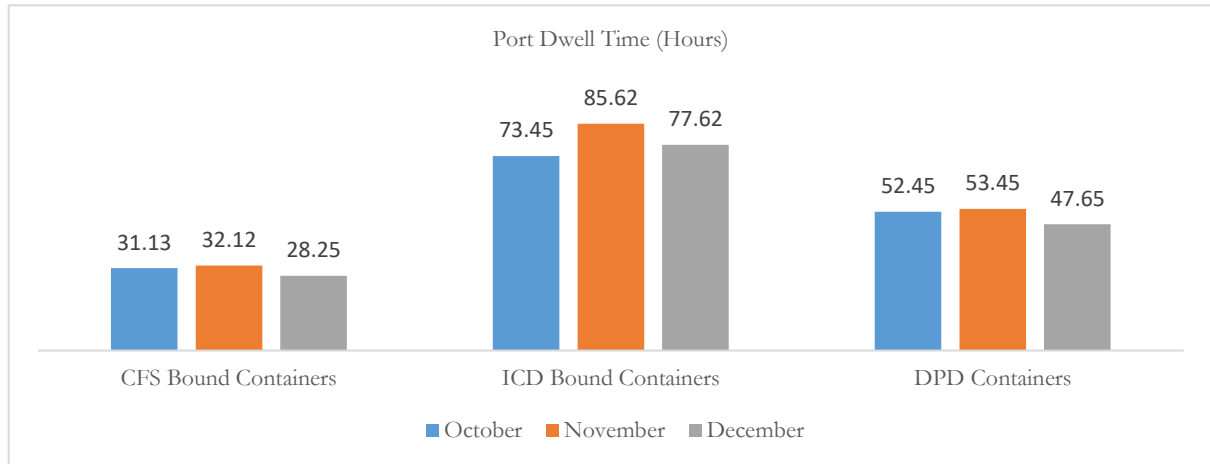
Parameter	JNPCT			GTICT			NSICT			NSIGT		
	CFS	ICD	DPE	CFS	ICD	DPE	CFS	ICD	DPE	CFS	ICD	DPE
Average time taken from container arrival at port to vessel sail off (hr)	92:36:58	133:20:18	98:06:39	68:49:22	101:44:42	70:18:52	-	120:25:10	77:36:06	-	109:06:36	85:25:23
Average terminal dwell time (hr)	100:07:54			74:21:14			86:11:29			91:04:36		
Average port dwell time	86:22:27											

3. Trend Analysis

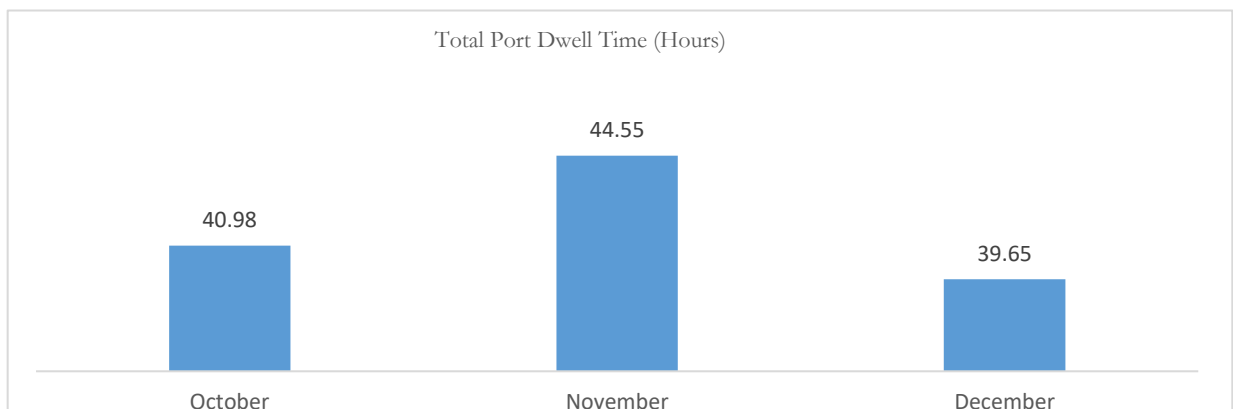
This section aims at analysing the trends in key metrics pertaining to the import and export value chains encompassing JNPT. The monthly comparison of the metrics have been depicted below:

3.1. Imports

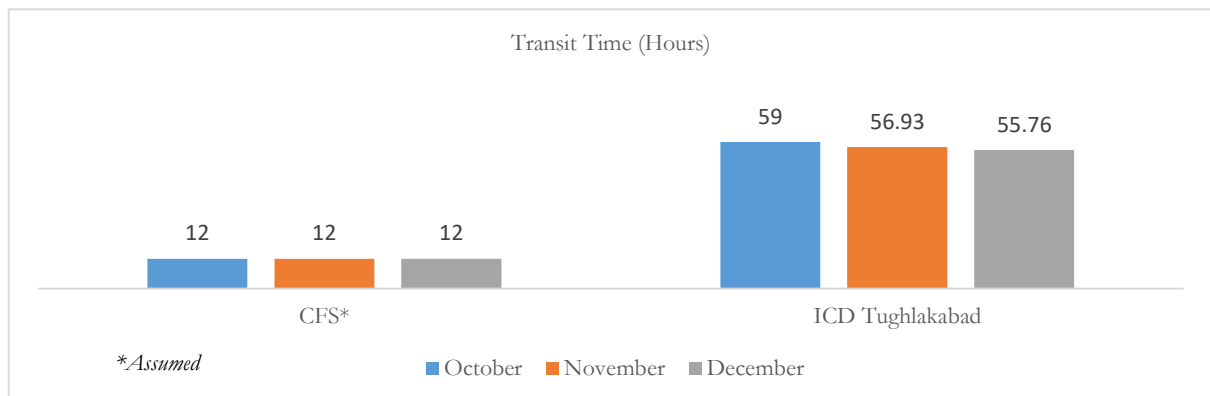
3.1.1. Port Dwell Time



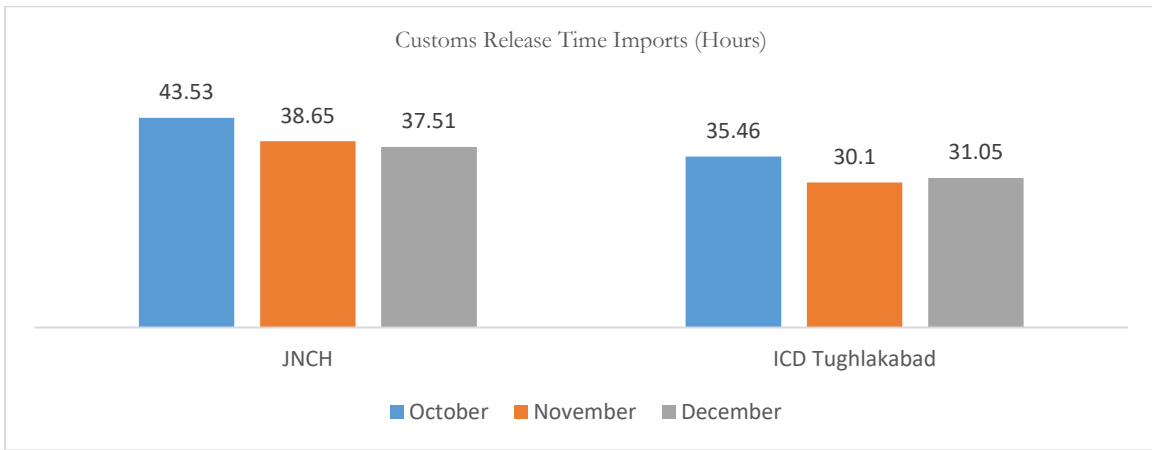
3.1.2. Total Port Dwell Time (All Terminals)



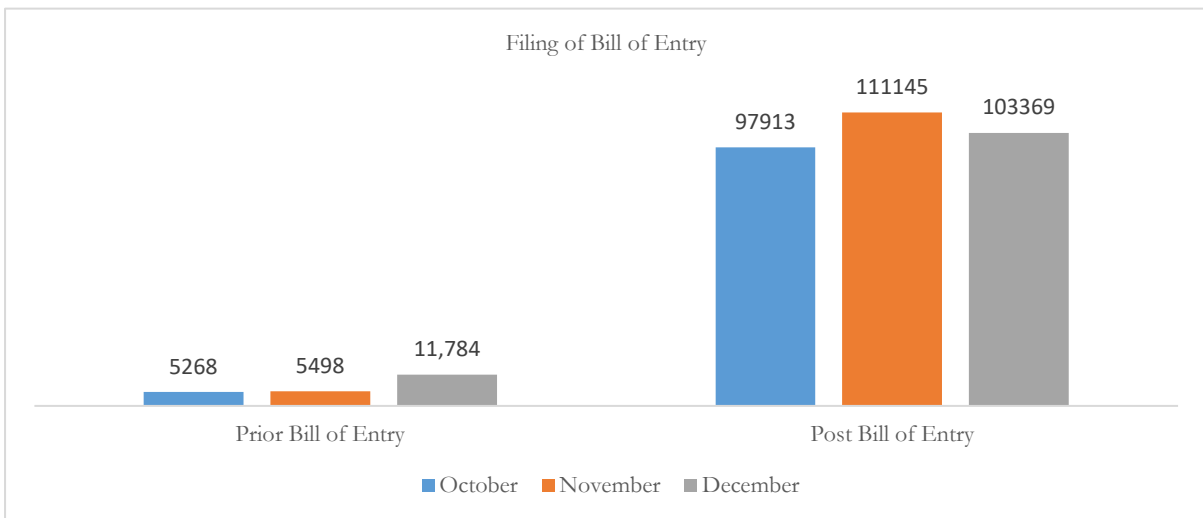
3.1.3. Transit Time



3.1.4. Customs Release Time

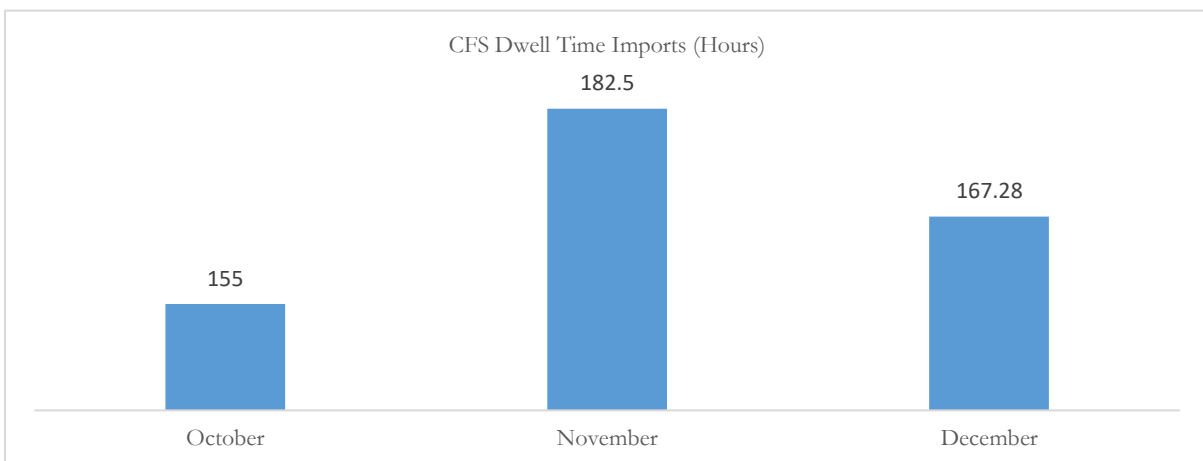


3.1.5. Advance Bill of Entry

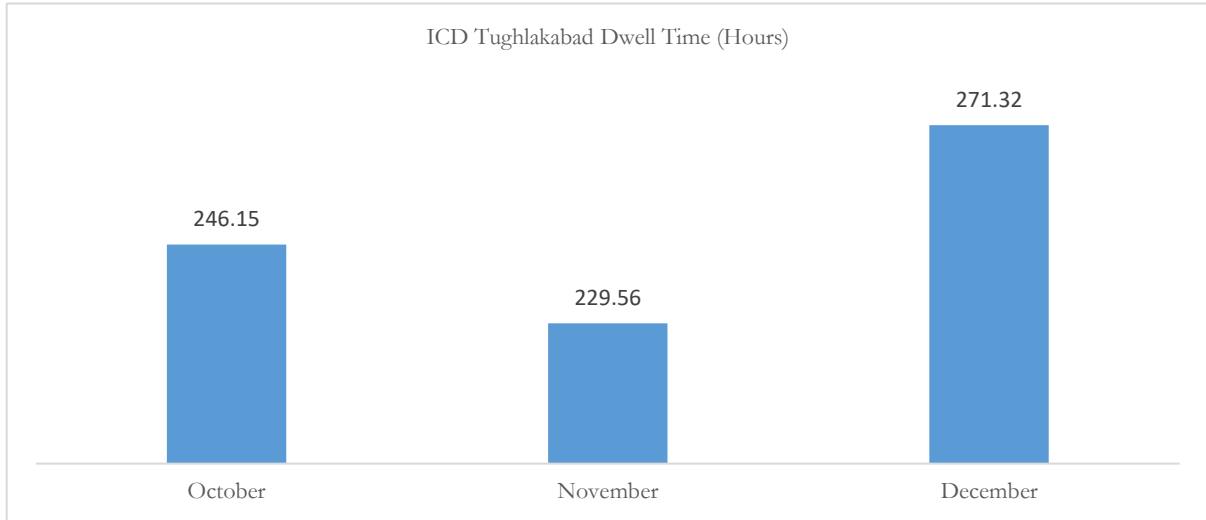


3.1.6. Custodian Dwell Time

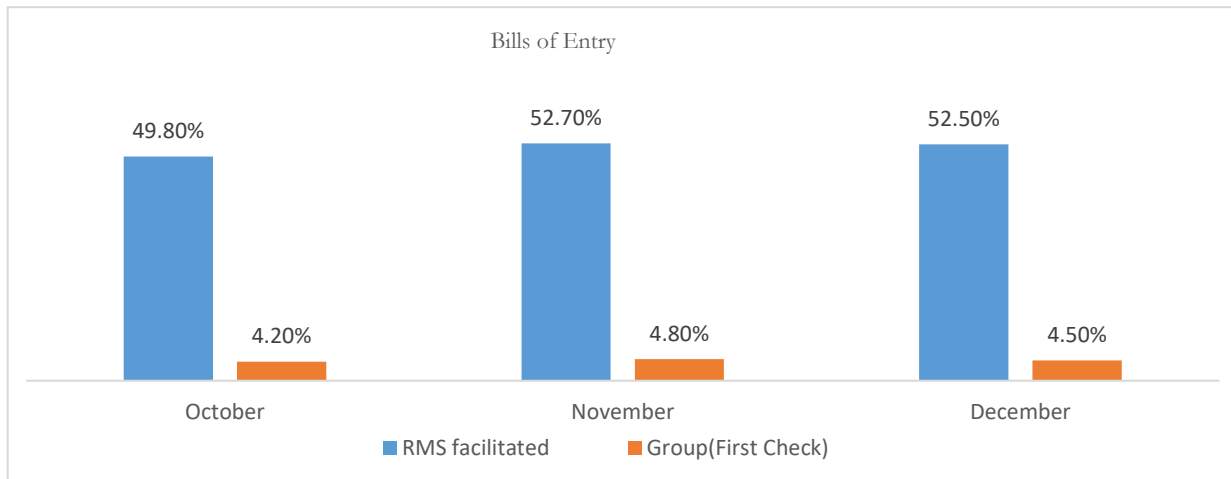
i) CFS



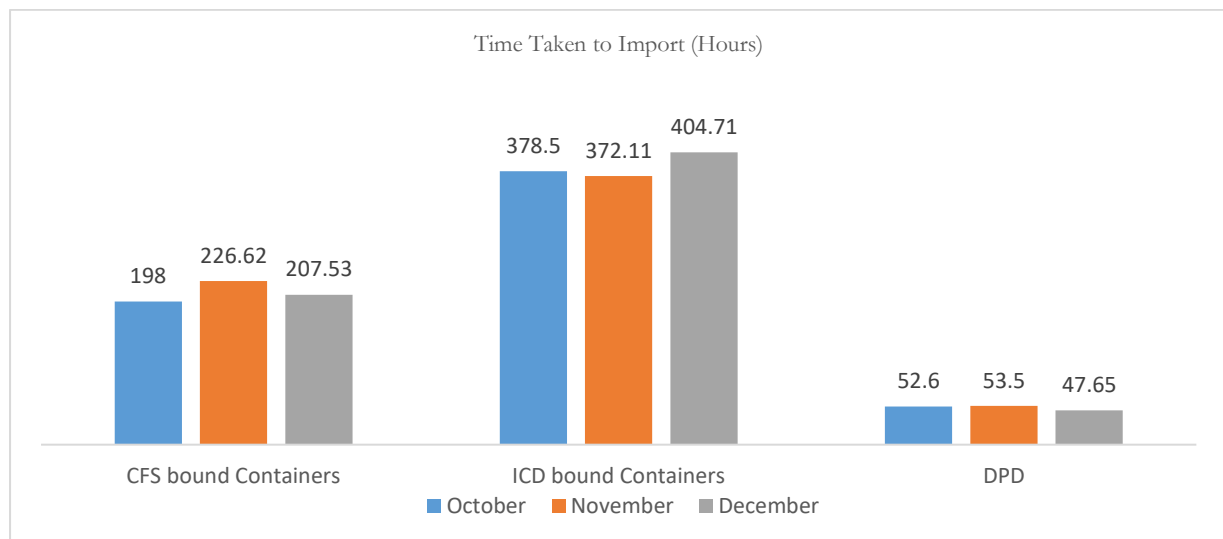
ii) ICD Tughlakabad



3.1.7. RMS and GROUP Bills of Entry

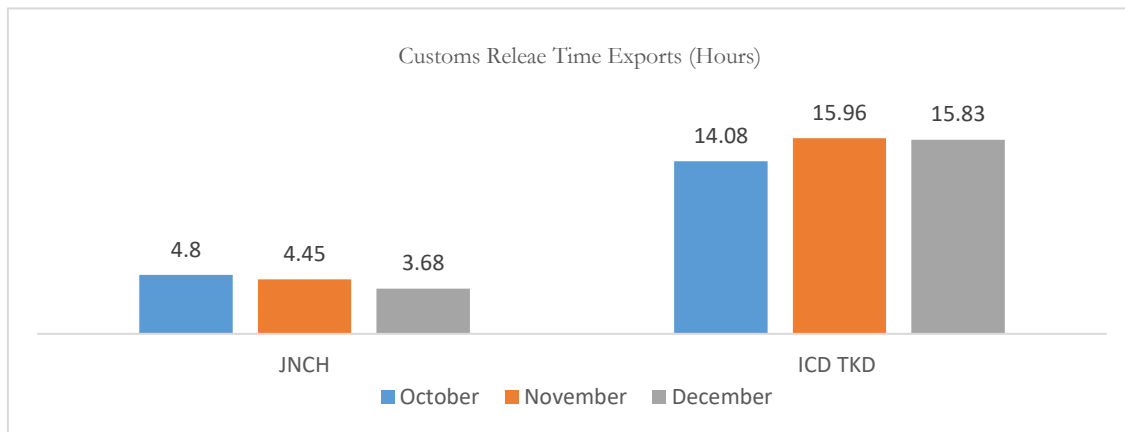


3.1.8. Time Taken to Import- Process wise



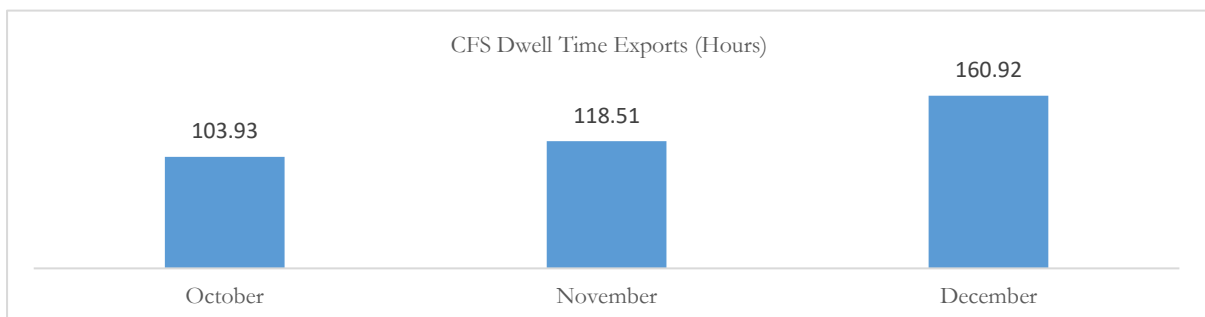
3.2. Exports

3.2.1. Customs Release Time

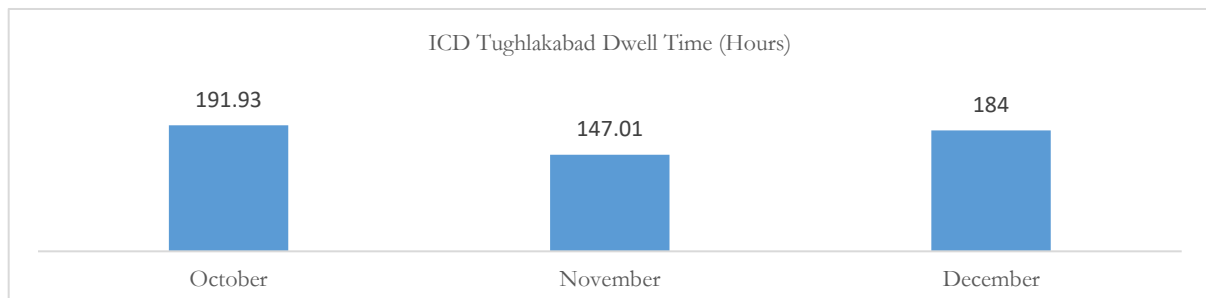


3.2.2. Custodian Dwell Time

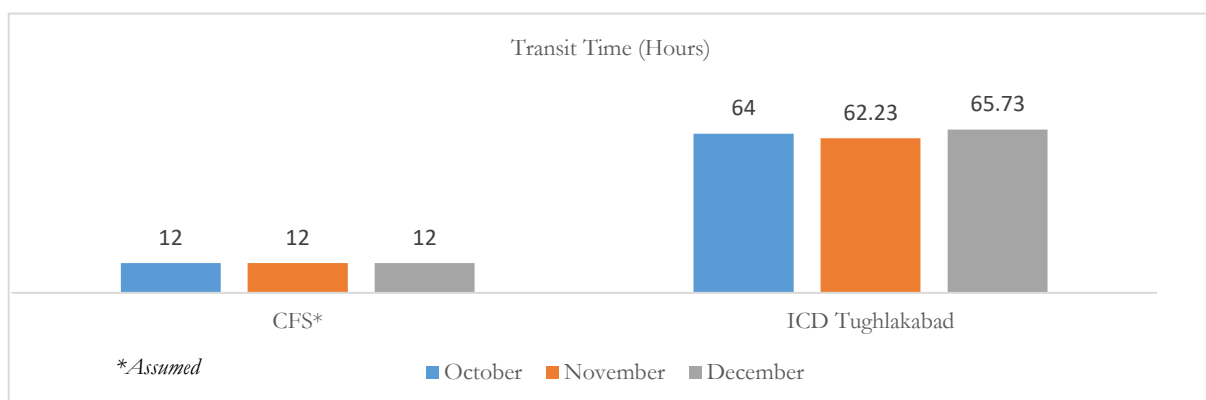
i) CFS



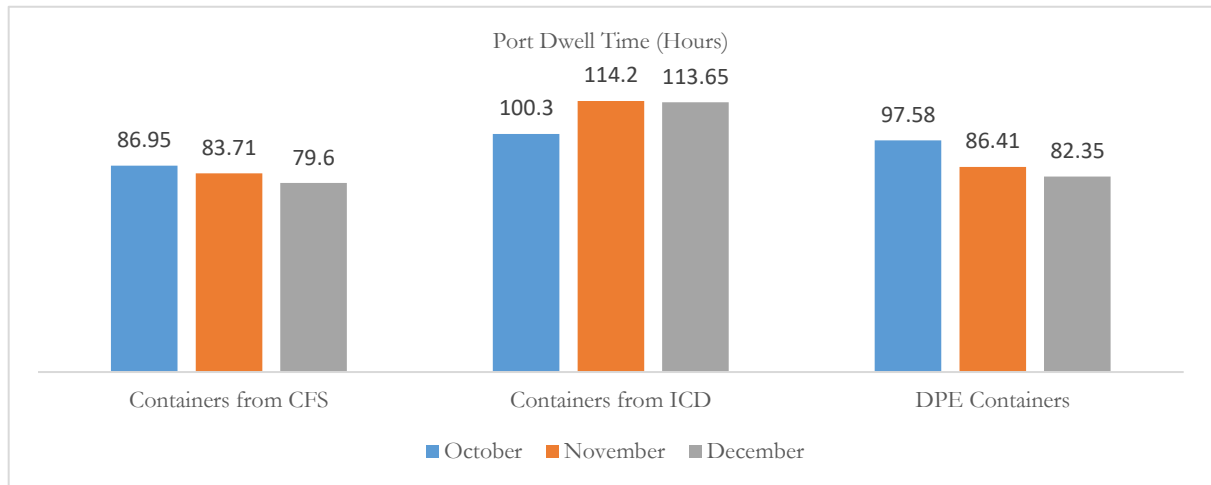
ii) ICD Tughlakabad



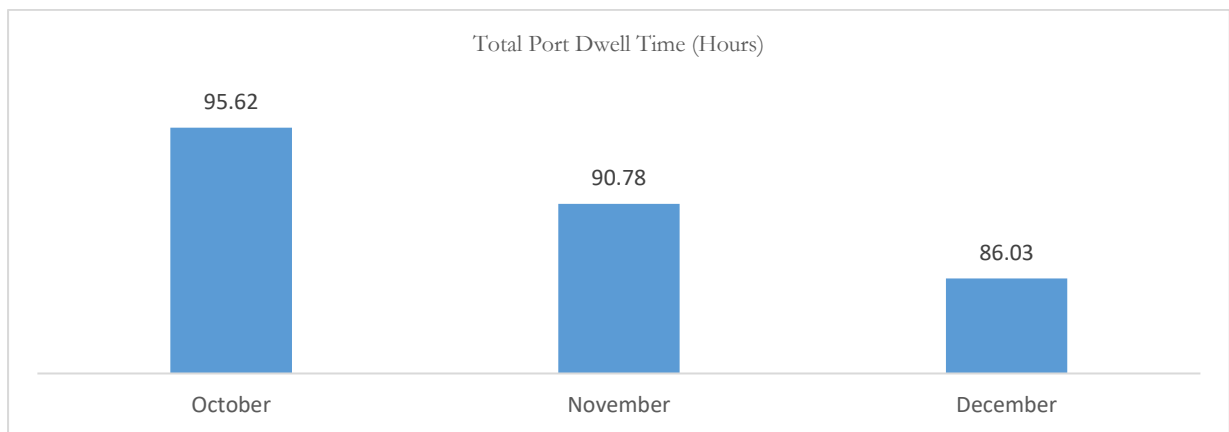
3.2.3. Transit Time



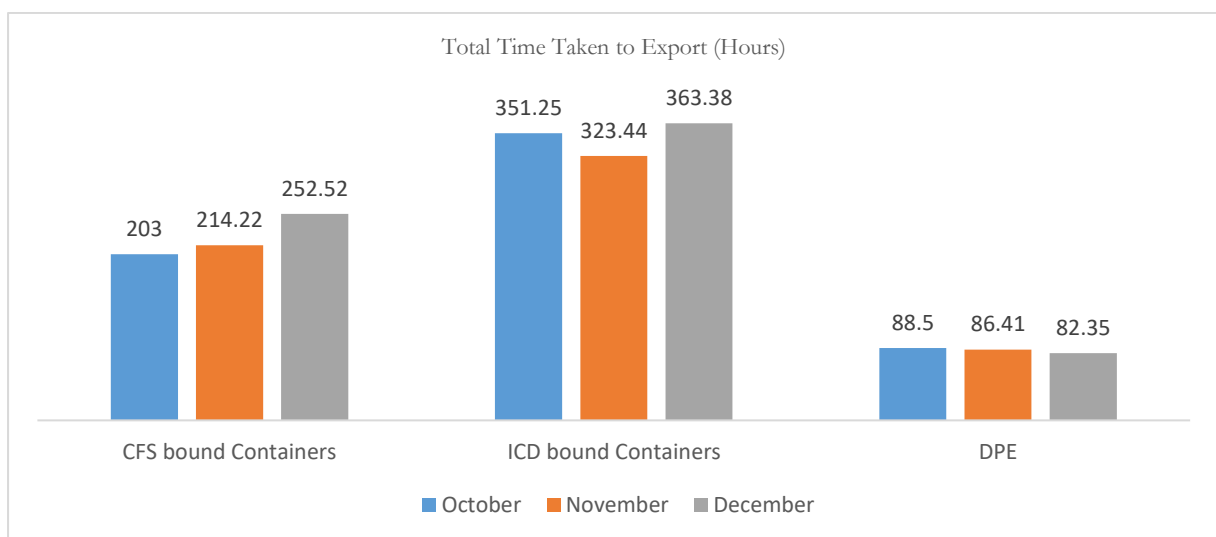
3.2.4. Port Dwell Time



3.2.5. Total Port Dwell Time (All terminals)



3.2.6. Total Export Time



ANNEXURE 1 - Imports

1.1. Terminal Dwell Time

Table 21: Step-wise Dwell Time of Import Containers for December 2016												
Parameter	JNPCT			GTICT			NSICT			NSIGT		
	CFS	ICD	DPD	CFS	ICD	DPD	CFS	ICD	DPD	CFS	ICD	DPD
Average time from vessel berthing to container discharge (hr)	10:32:34	10:46:54	09:58:55	07:00:07	06:49:30	07:02:47	05:50:28	05:55:54	04:44:10	10:57:46	12:07:24	05:49:35
Average time taken from container discharge to container out of port (hr)	17:32:33	62:48:58	27:58:30	19:05:38	67:19:51	45:19:38	20:25:47	75:40:39	39:54:02	28:20:00	80:14:12	49:44:50
Average dwell time (Vessel berthing to container out of port) (hr)	28:04:47	73:34:20	37:57:25	26:05:46	74:08:50	52:22:25	26:16:15	81:36:33	44:38:12	39:17:46	92:21:36	61:55:24
Average terminal dwell time (hr)	37:06:28			36:43:51			39:19:57			53:40:42		
Average port dwell time (hr)	39:11:17											

1.2. CFS Dwell Time

Table 22: CFS Specific Dwell Time for December 2016				
	A	B	C	D
CFS	Average time taken from gate-in to seal cutting	Average time taken from seal cutting to OOC	Average time taken from OOC to Gate-out	Total (Gate-in to gate out)
Total	111:52:46	93:24:19	39:12:05	167:17:50
Ameya (n= 11,559)	100:51:19	147:23:05	24:33:22	174:44:18
TG Terminals (n=555)	89:54:40	44:47:55	32:16:56	116:47:24
GDL (n=4,918)	113:37:33	N/A	54:03:36	164:10:46
Oceangate (n=2,715)	174:34:17	108:36:26	56:32:26	221:38:29
Punjab Conware (n=1,482)	125:23:40	N/A	43:19:46	155:45:28

Seabird (n=5,760)	117:24:40	N/A	N/A	176:35:56
JWC (n=1,844)	129:03:36	N/A	N/A	175:22:11
Hind Terminal (n=7,047)	119:46:53	20:47:00	48:18:48	169:05:53
Continental (n=16,237)	90:53:24	N/A	N/A	145:51:21
APM Main (n=4,124)	119:02:05	81:31:26	28:29:27	166:30:29
EFC Logistics (n=458)	140:46:47	94:47:10	78:01:06	195:57:52
APM Annexe (n=3,287)	148:16:22	69:38:30	41:57:04	192:51:39

1.3. Dwell Time by PGAs

Table 23: Average Time Taken by PGAs, December 2016					
	CDRUG	AQCS	WCCB	FSSAI	PQ
Total number of B/E (n)	1791	1478	291	5,740	35,637
Time taken from B/E filing to sample collection (hr)	14:56:45	14:40:48	15:37:34	8:46:16	N/A
Time taken from sample collection to report publishing (hr)	98:17:28	138:52:05	112:44:07	338:12:30	178:53:08

ANNEXURE 2 - Exports

2.1. CFS Dwell Time

Table 24: CFS Specific Dwell Time for December 2016				
CFS	Average time taken from Export Order to container stuffing	Container stuffing to movement order	Movement order to gate out	Total (ECO to gate out)
Total	141:43:31	19:33:30	7:26:46	160:55:00
Ameya (n=5,950)	96:30:38	12:03:04	2:28:29	110:30:55
TG Terminals (n=507)	102:40:28	21:15:16	15:23:05	139:18:49
GDL (n=8,487)	89:58:40	23:14:10	N/A	107:09:29
Hind Terminal (n=8,814)	94:26:34	24:13:27	9:16:20	128:18:36
Punjab Conware (n=13,263)	276:15:20	17:27:06	3:11:15	284:46:17
Seabird (n=647)	97:46:30	26:46:36	12:01:11	129:28:27
Oceangate (n=799)	122:11:10	29:51:12	24:58:04	156:26:02
JWC (n=2,953)	71:28:00	25:08:20	9:33:17	93:15:09
APM (n=253)	166:17:09	N/A	29:54:06	181:13:09
EFC Logistics (n=259)	146:18:11	41:25:57	13:21:13	173:23:26
AllCargo (n=1,809)	78:17:39	13:26:11	27:09:03	102:06:28
Continental (n=4,535)	79:15:56	N/A	N/A	101:46:01

2.2. Terminal Dwell Time

Table 25: Dwell Time of Export Containers for December 2016				
Parameter	JNPCT	GTICT	NSICT	NSIGT
Average terminal dwell time (hr)	100:07:54	74:21:14	86:11:29	91:04:36
Average port dwell time (hr)	86:22:27			

Observations:

Imports

- Direct Port Delivery (DPD): Approximately 4.17 per cent, 3.4 per cent and 4.00 per cent of the Import FCL containers at the analysed terminals were under the DPD initiative of customs for the months of October, November and December respectively. The evacuation of these containers from the port took approximately 2.17, 2.21 and 1.96 days for the three months from October to December. The shares have been the government's target for DPD from ports.
- Higher terminal dwell time for ICD-bound containers: The number of ICD-bound import containers are substantially lower as compared to CFS-bound containers. However, their dwell time at port has been the highest – considerably higher than DPD and CFS bound containers – pegging at 73.45, 85.62 and 77.62 hours for the months of October, November and December respectively. This is almost more than the free period given by the terminal (3 days).
- No considerable growth in share of RMS facilitated bills of entry: It was found that the number of RMS facilitated containers was almost the same, their share being 49.80 per cent, 52.70 per cent and 52.50 per cent for the months of October, November and December respectively.
- Time taken for seal cutting – a major contributor to CFS dwell time: It was observed that the process from CFS gate-in of a container to seal-cutting takes more than 100 hours. This can be reduced considerably, through further streamlining of processes and more proactive participation by the trade.
- Considerable time required for obtaining delivery order (DO): The average time taken for obtaining delivery order from shipping line after gate-in of a consignment at the CFS was around 112.00, 184.50 and 150.22 hours for the months of October, November and December respectively. While in certain cases, the customs give Out of Charge (OOC) before generation of delivery order, in majority of the cases, customs examination happens after DO generation, which makes it a major factor as far as CFS dwell time is concerned.
- High dwell time for PGAs: From the data set received from five PGAs, it was observed that the PGAs took, on an average, a minimum of 40 hours to publish reports. However, in case of FSSAI, it was observed that the average time for obtaining testing reports was 12 days or more. All five agencies under analysis i.e. FSSAI, PQIS, CDdrug, AQCS and WCCB are part of the customs SWIFT platform.

Insights

- Only a physical copy of Customs OOC is accepted at terminals and CFS (not an e-copy)
- The customs release time as calculated from the data sets may not correspond to (represent) the actual procedures on the ground. For example, the OOC gets electronically generated post duty payment (in case of RMS facilitated cargo) and post examination (in case of non-RMS cargo), but in practice, the trader has to procure the OOC from a customs representative in hard copy and get it stamped from the same officer. The issuance of a physical copy of OOC may take place hours after the electronic generation of OOC depending upon the availability of the trader or the custom's representative or both. This practice increases the dwell time of the custodian of the container (terminal or CFS/ICD).
- The issuance of OOC at the CFS level is based on the arrival notice and shipping line delivery order rather than examination alone. This further inflates the dwell time of CFS or terminal (in case of DPD containers).
- CFS dwell time for imports can potentially come down from 7-8 days to 4-5 days provided the following are achieved:
 - ✓ Awareness among importers on documentation
 - ✓ Duty payment by the importers before coming to CFS
 - ✓ Completed documents at the importers end
 - ✓ Prior filing of BoE
 - ✓ Faster clearance procedure
 - ✓ Clear SOPs for CFS

- Procedural delays escalating dwell time in DPD: In case of DPD, an authorisation letter from the customs (in hard copy) needs to be submitted to the shipping line before taking the delivery of the container. This leads to delays, as the trader has to go to the office of the shipping line to collect the same, a process which has a cascading effect on the overall dwell time of the container at the terminal.

Exports

- Higher customs release time at ICD Tughlakabad as compared to JNCH: As per the data analysed, the Customs takes around 3-4 times the time - from registration of goods to the generation of let export order (LEO) - at ICD Tughlakabad as compared to JNCH, as per analysis.
- High dwell time for containers originating from ICD: From table 15, it can be observed that the total time of a container at CONCOR from its arrival at the ICD to its arrival at port took around 255.93, 209.24 and 249.73 hours for the months of October, November and December respectively, which can be deliberated upon.
- High port dwell time: The weighted average of overall dwell time for analysed terminals has been 95.62, 90.78 and 86.03 hours respectively for October, November and December. Though the port dwell time for export FCL containers has shown a gradual decrease, there is scope for further reductions.