

GOVERNMENT OF PAKISTAN
DIRECTORATE GENERAL OF CUSTOMS VALUATION
7TH FLOOR, CUSTOM HOUSE,
KARACHI
Phone: 021-99214144

No. Misc/22/2008-VIII(B)/0099

Dated: 17th January, 2025

VALUATION RULING NO.1957/2025)

1. This ruling supersedes Serial No. 3 of Annexure to Valuation Ruling No. 1470/2020 dated 11-09.2020 and its addendum dated 25.11.2020.
2. This Ruling shall be applicable until the same is rescinded or revised in terms of sub-section (4) of Section 25A of the Customs Act, 1969.
3. 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.
4. The values in valuation ruling shall be treated as minimum benchmark values and shall be applicable to the given description and specification of goods.

SUBJECT: DETERMINATION OF CUSTOMS VALUES OF SPARK PLUGS UNDER SECTION 25A OF THE CUSTOMS ACT, 1969

1.	Valuation Ruling	In supersession of S. No. 3 of Annexure to Valuation Ruling No. 1470/2020 dated 11.09.2020 and its addendum dated 25.11.2020.
2.	Date of meetings with stakeholders	The meetings with relevant stakeholders were conducted on 23.03.2024 and 18.09.2024 and 17.12.2024.

Background of the Issue: The customs values of Spark Plugs determined vide addendum dated 25.11.2020 of Valuation Ruling Number 1470/2020 dated 11.09.2020 were challenged before the Director General of Customs Valuation under Section 25D of the Customs Act, 1969 by the stakeholders that was upheld by the Director General vide Order-in-Revision No. 12/2021 dated 16.03.2021. Being aggrieved the stakeholders filed customs appeals before the Honorable Customs Appellate Tribunal. The Customs Appellate Tribunal vide its order of judgment dated 07.02.2022 set aside the entry at S. No. 3 of Annexure to Valuation Ruling No. 1470/2020 dated 11.09.2020, its addendum dated 25.11.2020 along with the Order-in-Revision No. 12/2021 dated 16.03.2021 with the direction to issue a new Valuation Ruling for Spark Plugs depicting correct description in consultation with stake holders. Accordingly, proceedings for the determination of customs values of Spark Plugs were initiated under 25A of the Customs Act, 1969.

2. Analysis to determine Customs Values: Meetings were convened on 23.03.2024, 18.09.2024 and 17.12.2024 that were attended by relevant stakeholders including the representatives of PASPIDA, KCC&I, and other commercial importers along with the local manufacturers / assemblers were invited to participate in the meeting and share their input on the matter. The representative from PASPIDA submitted that the values of Spark Plugs in Valuation Ruling Number 1470/2020 dated 11.09.2020 read with its Addendum dated 25.11.2020 were on higher side. The participants were further requested to provide written arguments, literature and other relevant documents before the Directorate to substantiate their contentions in order to finalize the same.

3. Method(s) adopted to determine Customs values: Valuation methods specified in Section 25 of the Customs Act, 1969, are duly considered 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 goods value method provided in Section 25(5) was 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 absence of absolute demonstrable evidences of quantities and qualities. Information available was, hence, found incomplete. Subsequently, similar goods value method provided in Section 25(6) was also examined for applicability to determine Customs values of subject goods and was not considered due to afore-stated reasons. Moreover, declared values of similar goods had showed consistent variations. Hence, this method was also found inapplicable. Market enquiry as envisaged under Sub section (7) of Section 25 of the Customs Act, 1969 was also conducted of subject goods were also worked upon but could not be solely relied upon due to fluctuation of different prices. In line with statutory sequential order of Section 25(8) of the Customs Act, 1969 was examined, but the same also could not be applied as the conversion cost from the constituent materials and allied expenses, in the country of export, were not available. Finally, the Customs values of the subject goods have been determined under Section 25(9) read with Section 25(7) of the Customs Act, 1969 further read with Customs Rule 121(2) of Customs Rules, 2001.

4. Customs values for Spark Plugs - hereinafter specified shall be assessed to duty / taxes at following Customs Values:

S. No.	Item Description	PCT Code	Proposed PCT for WeBOC	Origins	Customs Value (C&F) US\$/Pc
1	Iridium Tipped Spark Plug	8511.1000	8511.1000.1000	China	3.38
			8511.1000.1100	Japan	4.40
			8511.1000.1200	Europe	5.24
			8511.1000.1300	Other Origins	3.42
2	Non-Iridium Tipped Spark Plug		8511.1000.1400	China	0.36
			8511.1000.1500	Japan	0.52
			8511.1000.1600	Europe	0.82
			8511.1000.1700	Other Origins	0.41

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 VR and in case of any anomaly may be brought to the notice of this Directorate immediately.

(DR. TAHIR QURESHI)

Director

Copy for necessary action and implementation:

The Collectors / Directors of Customs, Collectoratos / Directorates of Customs (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.