Government of India (भारत सरकार)
Department of Commerce (वाणिज्य विभाग)
Directorate General of Foreign Trade (विदेश व्यापार महानिदेशालय)
Vanijya Bhawan, New Delhi-110011 वाणिज्य भवन, नई दिल्ली
*****

**01/89/180/41/PSIA/AM-24/PC(A)** /411

Date of Order: 17.07.2026
Date of Issue: 17.07.2026

Name of the Agency: **M/s Trumetric Global Services Pvt. Ltd.**
BIZ01049, Compass Building,
Al Shohada Road, Al Hamra Industrial Zone,
United Arab Emirates, Ras Al Khaimah

Order passed by: **Shri Rakesh Kumar**
**Additional Director General of Foreign Trade**

## ORDER-IN-ORIGINAL

Any person/party aggrieved by this order may prefer an appeal under Section 15 of the Foreign Trade (Development and Regulation) Act, 1992, before the Competent Authority. The appeal may be filed within 45 days from the date of receipt of this Adjudication Order, together with a copy of this Order and a complete set of evidence relied upon, as an Annexure to the appeal.

**2.** Any person/party desirous of filing an appeal against this order shall deposit the penalty amount and produce proof of payment of the penalty amount along with the appeal to the Appellate Authority, failing which the appeal is liable to be rejected for non-compliance with the provisions of Section 15 of the Foreign Trade (Development and Regulation) Act, 1992.

**3.** The penalty amount is to be deposited under the Head of Account "1453 Foreign Trade and Export Promotion Minor Head 102 other receipts fines and penalties etc. Imports and Exports Control Organization". Evidence of payment of the penalty is required to be furnished to the Adjudicating Authority within 45 days from the date of service of this Adjudication Order.

## 4. FACTS OF THE CASE

**4.1** M/s Trumetric Global Services Pvt. Ltd., BIZ01049, Compass Building, Al Shohada Road, Al Hamra Industrial Zone-FZ, United Arab Emirates, Ras Al Khaimah (hereinafter referred to as the 'Agency') is a Pre-Shipment Inspection Agency (PSIA) recognized by the Directorate General of Foreign Trade (DGFT) vide Public Notice No. 11/2024-2025 dated 12.06.2024. The Agency was granted recognition as per Para 2.52 of the Handbook of Procedures (hereinafter referred to as 'HBP'), as amended from time to time, for conducting pre-shipment inspections of metallic scrap consignments intended for import into India and issuing Pre-Shipment Inspection Certificates (hereinafter referred to as 'PSICs') in connection therewith.

**4.2** During the review of records for the period 1st January 2024 to 31st August 2024, it was observed that the Agency had issued a significantly large number of PSICs covering a vast geographical range in a manner inconsistent with its available personnel and resources. Analysis of the top inspection days revealed an extraordinarily high volume of certifications on single dates: 95 inspections were reported on 25.01.2024, spanning Yemen (83), Italy (5), Bahrain (3), United States of America (3) and Canada (1); and 90 inspections were reported on 20.05.2024, spanning Kuwait (68), United States of America (12), Poland (6), Italy (4) and other territories. This volume of inspections far exceeded what is physically and logistically feasible for the declared equipment and personnel available to the Agency.

**4.3** On further examination of records, the following specific instances were observed where PSICs issued against single registered instruments were reflected as having been issued on the same date, i.e. 25.01.2024, by multiple inspectors of the Agency operating from geographically distant and incompatible locations:

**a)** Instrument No. 81848: 44 Pre-Shipment Inspections were conducted on 25.01.2024 by two inspectors (Mr. Shakti Singh and Mr. Yashashvee Yadav) of the Agency, operating from Canada, Italy and Yemen.

**b)** Instrument No. 81849: 17 Pre-Shipment Inspections were conducted on 25.01.2024 by the same two inspectors (Mr. Shakti Singh and Mr. Yashashvee Yadav) of the Agency, operating from United States of America and Yemen.

**4.4** The issuance of multiple PSICs on the same day by different inspectors at geographically distant locations using the same inspection instrument raises serious concerns regarding the integrity and coordination of the inspection process. Such issuance within a single day does not appear to be practically feasible and gives rise to a reasonable apprehension that the PSICs may have been issued in a routine or "table-based" manner, without the actual conduct of the requisite physical inspections. The facts and circumstances available on record cast a reasonable doubt on the fairness and certainty of the operations carried out by the PSIA and undermine the credibility of the certifications issued thereunder.

**4.5** As per Para 2.51 of the HBP, the import of any form of metallic waste/scrap is subject to the condition that it will not contain hazardous, toxic waste, radioactive contaminated waste/scrap containing radioactive material, any type of arms, ammunition, mines, shells, live or used cartridge or any other explosive material in any form either used or otherwise. Further, the PSIA is statutorily obligated to inspect metal scrap consignments physically at the site of inspection and to ensure that no radioactive contaminated material or other hazardous waste is imported into India under the guise of metal scrap. Hence, the import of metallic waste or scrap is a matter of national security interest and recognition of agencies and the subsequent issuance of PSICs is subject to strict scrutiny.

**4.6** In view of the above, Para 2.53(a) of the HBP provides, 'In case of any mis-declaration in PSIC or mis-declaration in the online application form for recognition as PSIA, the PSIA would be liable for penal action under the Foreign Trade (Development & Regulation) Act, 1992, as amended, in addition to suspension/cancellation of recognition.'

**4.7** Further, as per Section 11(2) of the Foreign Trade (Development & Regulation) Act, 1992 (hereinafter referred to as the 'FTDR Act'), 'Where any person makes or abets or attempts to make any export or import in contravention of any provision of this Act or any rules or orders made thereunder or the foreign trade policy, he shall be liable to a penalty as prescribed thereunder.'

**4.8** Additionally, as per Section 11(3) of the FTDR Act, 'Where any person signs or uses, or causes to be made, signed or used, any declaration, statement or document submitted to the Director General or any officer authorised by him under this Act, knowing or having reason to believe that such declaration, statement or document is forged or tampered with or false in any material particular, he shall be liable to a penalty as prescribed thereunder.'

**4.9** In compliance with Section 14 of the Foreign Trade (Development and Regulation) Act, 1992, a Show Cause Notice bearing No. 01/89/180/41/PSIA/AM24/PC(A)/81 dated 24.09.2024 was issued to the Agency, setting out the specific discrepancies, the material relied upon in support thereof, and calling upon the Agency to show cause as to why its recognition as a Pre-Shipment Inspection Agency (PSIA) should not be suspended or cancelled, why penalty should not be imposed under Sections 11(2) and 11(3) of the Act, and why its Proprietors/Partners/Directors should not be blacklisted. Pursuant thereto, the Agency was afforded an opportunity of personal hearing on 31.12.2024. Subsequently, upon the adjudicatory proceedings being taken over by a new Adjudicating Authority, an Addendum to the Show Cause Notice bearing No. 01/89/180/41/PSIA/AM-24/PC(A) dated 02.04.2026 was issued in the interest of the principles of natural justice, with a view to affording the Agency a fresh opportunity of personal hearing and to submit such additional written submissions as it deemed appropriate. A personal hearing was conducted through hybrid mode on 07.05.2026 and was attended in person on behalf of the Agency by its Authorised Representative, Shri Sharad Chand Srivastava, Advocate. Pursuant thereto, the Agency filed its detailed written submissions vide reply dated 16.05.2026. The said submissions, together with the documents placed on record, have been duly taken on record and carefully considered during the course of the present adjudication.

## 5. SUBMISSIONS OF THE AGENCY

The Agency, vide its reply to the Show Cause Notice and through submissions made during the personal hearings held on 31.12.2024 and 07.05.2026 the latter attended by its Authorised Representative, Shri Sharad Chand Srivastava, Advocate and through its written submission dated 16.05.2026, submitted the following before the Adjudicating Authority-

**5.1** The Agency submitted that it has been engaged in the field of pre-shipment inspection of metal scrap consignments for the past five years and maintains a dedicated and experienced team of Inspectors, together with requisite equipment for inspection in each and every country/region assigned to it. It was submitted that its Inspectors carry out inspections with specific equipment allotted to them for each consignment, following the prescribed procedure, and thereafter electronically forward Inspection Reports along with photographs/videos to the Agency's back office, which in turn uploads the same on the DGFT Portal and issues the requisite PSIC.

**5.2** The Agency submitted that each and every inspection reflected in the table appended to Para 4 of the Addendum was, in fact, carried out by different Inspectors operating in Canada, Italy and Yemen, using the equipment respectively allotted to them, and that Inspection Reports/photographs/videos in respect thereof were duly forwarded to its back office. It was submitted that the data entry staff at the back office, however, committed an inadvertent error while entering the data on the DGFT Portal, resulting in entry of incorrect particulars regarding the Inspector's name and the Equipment Number. The Agency furnished the following "correct particulars" in respect of the referred PSICs for the noticee's kind perusal:

| Date | No. of PSICs | Place of Inspection | Equipment No. | Inspector's Name |
|---|---|---|---|---|
| 25-01-2024 | 1 | Canada | RADCOM, MSPEC 200355 | Shantosh Kumar |
| 25-01-2024 | 5 | Italy | GAMMA SCOUT 81847 | Anuj Juhari |
| 25-01-2024 | 83 | Yemen | GAMMA SCOUT 81848 | Shakti Singh |
| 25-01-2024 | 3 | USA | SHANGDON RAD-35 170310201 | Vaibhav Yadav |
| **Total** | **92** | | | |

**5.3** The Agency submitted that it was only an inadvertent mistake on the part of the Data Entry Operator which led to the erroneous mentioning of the Inspector's name and Equipment Number, and reiterated that the Certificates were issued after actual physical inspections following the prescribed procedure, and that the inference that the PSICs were non-genuine is ex facie incorrect.

**5.4** The Agency tendered its regret and apology for the alleged error in data entry, undertook to be more cautious in future, and most respectfully prayed that the proceedings initiated vide the Show Cause Notice dated 24.09.2024 and the Addendum dated 02.04.2026 be dropped.

## 6. DISCUSSIONS AND FINDINGS

**6.1** At the outset, the principal issue for determination is whether the Pre-Shipment Inspection Certificates (PSICs) issued by the Agency represent inspections actually carried out in accordance with the provisions of the Handbook of Procedures, or whether the records maintained by the Agency disclose such operational impossibilities and inconsistencies as to render the certifications unreliable. The proceedings are founded not on assumptions but on analysis of PSIC data available on record, inspection particulars furnished by the Agency, and the deployment details of inspectors and inspection instruments as declared by the Agency itself.

**6.2** The proceedings arise from specific discrepancies noticed in the inspection records maintained and uploaded by the Agency. Examination of the records revealed that identical DGFT-approved inspection instruments were reflected as having been utilised simultaneously by different inspectors operating from geographically distant and mutually incompatible locations on the same date, namely 25.01.2024. Such deployment is inherently inconsistent with the physical use of a single inspection instrument and raises serious doubts regarding the integrity, traceability and authenticity of the inspections certified by the Agency.

**6.3** The specific instances evidencing such operational infeasibility, as identified in the Addendum to the Show Cause Notice, are reproduced below:

| PSIC Number | Inspector Name | Inspection Country | Inspection Date | Sr. No. of Instrument |
|---|---|---|---|---|
| PSICTSPLXX268973AM24 | YASHASVEE YADAV | Italy | 25-01-2024 | 81848 |
| PSICTSPLXX269550AM24 | SHAKTI SINGH | Canada | 25-01-2024 | 81848 |
| PSICTSPLXX270067AM24 | YASHASVEE YADAV | Yemen | 25-01-2024 | 81848 |
| PSICTSPLXX270424AM24 | YASHASHVEE YADAV | Yemen | 25-01-2024 | 81848 |
| PSICTSPLXX270509AM24 | YASHASVEE YADAV | Yemen | 25-01-2024 | 81848 |
| PSICTSPLXX272413AM24 | YASHASHVEE YADAV | Yemen | 25-01-2024 | 81848 |

**6.4** The record discloses that Instrument No. 81848 was reflected against 44 Pre-Shipment Inspections on 25.01.2024, purportedly conducted by two inspectors operating simultaneously from Canada, Italy and Yemen; and that Instrument No. 81849 was reflected against 17 Pre-Shipment Inspections on the very same date, purportedly conducted by the same two inspectors operating from United States of America and Yemen. The simultaneous deployment of the same registered inspection instrument across countries separated by substantial geographical distance is incapable of physical execution and is fundamentally inconsistent with the mandatory requirement that inspections be conducted through approved inspection instruments actually available at the place of inspection.

**6.5** The Addendum to the Show Cause Notice specifically identified these instances by furnishing details of the instrument serial numbers, the names of inspectors, the countries of inspection and the dates of inspection. The said particulars were furnished to the Agency during the personal hearing, thereby affording it a meaningful opportunity to explain the discrepancies. The discrepancies relied upon in these proceedings are therefore founded upon specific inspection particulars declared by the Agency itself and not upon general assumptions or statistical analysis.

**6.6** The Agency has sought to explain the discrepancies by attributing them to an inadvertent data-entry error committed by its back-office staff and has furnished a revised table vide its reply dated 16.05.2026 setting out what it claims to be the correct particulars of the Inspectors and equipment deployed. The said explanation has been carefully considered but is found to be wholly unconvincing. By way of illustration, the Agency's own "corrected" table accounts for only 92 inspections conducted on 25.01.2024 (Canada–1, Italy–5, Yemen–83 and USA–3), whereas the Show Cause Notice, based on the Agency's own declarations on the DGFT portal, records 95 inspections on the same date, including three inspections pertaining to Bahrain. The Agency has remained completely silent regarding these Bahrain inspections and has furnished neither any correction nor any explanation in respect thereof, rendering its purported correction internally inconsistent and incomplete. Likewise, the Addendum to the Show Cause Notice had specifically identified Instrument No. 81849, under which 17 Pre-Shipment Inspections were shown as having been conducted on 25.01.2024 by inspectors operating from the United States of America and Yemen. Significantly, the Agency's reply and the revised table make no reference whatsoever to this instrument, nor do they furnish any corrected particulars or explanation despite the discrepancy having been specifically brought to its notice and despite adequate opportunities having been afforded to rebut the same. These examples are merely illustrative of the numerous discrepancies noticed during the investigation and demonstrate that the Agency's so-called corrections neither comprehensively address nor satisfactorily explain the inconsistencies reflected in its own records. Furthermore, the plea of an inadvertent data-entry error is inherently implausible. A bona fide clerical error would ordinarily result in isolated or sporadic inaccuracies; however, the present record discloses a repeated and systematic pattern whereby identical instrument numbers, including Instrument Nos. 81848 and 81849, were declared across a large number of inspections undertaken by different inspectors in geographically distant countries on the same date. Such a consistent pattern cannot reasonably be attributed to accidental data entry. Moreover, the Agency has failed to produce any contemporaneous documentary evidence, such as equipment deployment records, instrument custody or calibration records, inspector movement logs, internal error reports, or correspondence evidencing discovery and rectification of the alleged error. In the absence of any such corroborative material, the explanation offered remains a bare, ex post facto assertion which is insufficient to displace the discrepancies emerging from the Agency's own declarations and is accordingly rejected.

**6.6** It is also relevant that Para 2.53(c), (d) and (e) of the HBP mandate that a PSIA shall capture and upload, at the time of issuance of each PSIC, photographic and/or video evidence of the inspection, including a photograph of the instrument used for inspection captured together with the container seal, with the instrument's serial number clearly visible in the same photograph this being the very safeguard designed to ensure traceability and to guard against precisely the kind of discrepancy alleged in the present proceedings. If, as now claimed by the Agency, the instrument numbers declared in respect of the 44 and 17 PSICs referred to above were incorrectly entered, it would necessarily follow that the photographic/video evidence contemporaneously uploaded in respect of each such PSIC statutorily required to depict the instrument actually used, with its serial number visible would also stand at variance with the "corrected" instruments now sought to be introduced. The Agency has not placed on record any such photographic or video evidence to reconcile its claim with the mandatory documentation required to have been uploaded contemporaneously with the very PSICs in question. In the absence thereof, the "data entry error" explanation remains a bare, unsubstantiated assertion which does not address, let alone displace, the statutory safeguard itself intended to prevent such discrepancies.

**6.7** Further, as per Para 2.52(e) of the HBP, a PSIA carrying out inspections through deputed Inspectors in a country where it does not maintain a full-time equipped branch office is required to furnish prior intimation to DGFT together with details of the visit/inspection undertaken. The Agency has not placed on record any evidence of such prior intimation having been furnished to DGFT in respect of the inspections claimed to have been carried out in Canada, Italy and the United States of America, nor has it demonstrated the existence of a full-time equipped branch office at each of these locations. The burden of establishing compliance with this mandatory requirement rested upon the Agency, which it has failed to discharge.

**6.7** In these circumstances, the burden of satisfactorily explaining the discrepancies disclosed by its own inspection records rested squarely upon the Agency, which it has failed to discharge. The Agency's reply, at best, offers a bare and selectively-corrected version of events that neither accounts for the full quantum of inspections recorded in the Show Cause Notice, nor addresses one of the two specific instruments identified in the Addendum, nor is supported by any independent contemporaneous documentary evidence.

**6.8** The regulatory framework under the FTDR Act, 1992, the Foreign Trade Policy, 2023 and the Handbook of Procedures is preventive in nature. Recognition as a PSIA carries with it a continuing statutory obligation to conduct inspections strictly in accordance with the prescribed procedure and to issue PSICs containing true and accurate particulars. Regulatory action is not contingent upon the occurrence of an actual radiation incident, Customs objection or other consequential loss. Once the inspection records themselves disclose operational impossibilities and material inconsistencies affecting the integrity, traceability and reliability of the inspection process, the Agency becomes liable for appropriate regulatory action irrespective of whether any subsequent adverse consequence has materialised.

**6.9** It is also observed that Pre-Shipment Inspection Certificates are intended to ensure that imported metallic scrap is free from radioactive contamination, arms, ammunition, explosives and other hazardous materials before its entry into India. The integrity of the inspection process is therefore fundamental to public safety, environmental protection, national security and effective customs administration. Any compromise in the authenticity or traceability of such inspections cannot be treated as a mere procedural lapse but strikes at the very purpose for which recognition is granted to a Pre-Shipment Inspection Agency.

**6.10** It is observed that the principles of natural justice have been fully complied with during the course of the present proceedings. The Agency was duly apprised of the allegations through the Show Cause Notice dated 24.09.2024 and the Addendum dated 02.04.2026, and was afforded adequate and effective opportunity to present its defence. The record demonstrates that personal hearings were granted on 31.12.2024 and 07.05.2026 the latter attended on behalf of the Agency by its Authorised Representative, Shri Sharad Chand Srivastava, Advocate and the Agency was further permitted to file written submissions, which were duly submitted vide reply dated 16.05.2026. All submissions, oral and written, together with the documents relied upon by the Agency, have been carefully considered and taken on record before arriving at the present findings. However, despite the opportunities so afforded, the Agency has failed to produce any cogent, credible or contemporaneous evidence capable of satisfactorily explaining the discrepancies identified in its inspection records or of displacing the findings recorded herein. Accordingly, the Agency has been afforded a full and reasonable opportunity of being heard in accordance with the principles of natural justice, and no prejudice can be said to have been caused to it during the adjudication of the present proceedings.

**6.11** As per Para 2.53(a) of Handbook of Procedure 2023, mis-declaration of inspection made by the Pre-Shipment Inspection Agency attracts penal consequences. Para 2.53(a) of HBP reads as,

> *"In case of any mis-declaration in PSIC or mis-declaration in the online application form for recognition as PSIA, the PSIA would be liable for penal action under Foreign Trade (Development & Regulation) Act, 1992, as amended, in addition to suspension/cancellation of recognition."*

**6.12** In the absence of any satisfactory explanation or supporting documentary evidence demonstrating the physical movement and deployment of the inspector and inspection instrument across such locations, the contention of the Agency cannot be accepted. The discrepancies observed clearly indicate serious lapses in compliance with the obligations governing the issuance of PSICs

I, therefore, in exercise of the powers vested in me under Section 13 read with Section 11 of the Foreign Trade (Development & Regulation) Act, 1992, as amended, and Para 2.53(a) of the Handbook of Procedures, pass the following order,

## ORDER

**01/89/180/41/PSIA/AM-24/PC(A)** **Dated: 17.07.2026**

**i.** The recognition granted to M/s Trumetric Global Services Pvt. Ltd. as a Pre-Shipment Inspection Agency is hereby cancelled with immediate effect.

**ii.** The Bank furnished by M/s Trumetric Global Services Pvt. Ltd. at the time of recognition/renewal as a Pre-Shipment Inspection Agency is hereby forfeited in full, in view of the established violations of the conditions of recognition and the obligations prescribed under the Handbook of Procedures.

iii. A penalty of ₹10,00,000/- (Rupees Ten Lakhs Only) is hereby imposed upon M/s Trumetric Global Services Pvt. Ltd. under Section 11 of the FT (D&R) Act, 1992, for the violations established herein.

**(Rakesh Kumar)**
**Additional Director General of Foreign Trade**

**To:**

M/s Trumetric Global Services Pvt. Ltd.,
BIZ01049, Compass Building,
Al Shohada Road, Al Hamra Industrial Zone-FZ,
United Arab Emirates, Ras Al Khaimah

**Copy to:**

1. Joint Secretary, Customs, Central Board of Indirect Taxes and Customs (CBIC)
2. Commissioners of Customs, Chennai / Cochin / Ennore / JNPT / Kandla / Mormugao / Mumbai / New Mangalore / Paradip / Tuticorin / Visakhapatnam / Pipavav / Mundra / Kolkata / Krishnapatnam / Kattupalli / Hazira / Kamarajar / Adani Gangavaram
3. DGFT Website
4. EGTF Section, DGFT Hqrs