

MINUTES OF EPCG COMMITTEE MEETING HELD UNDER THE CHAIRMANSHIP OF SHRI MUKESH BHATNAGAR , ADGFT AT 1430 Hours ON 15.05.2013

Following officers attended the meeting:

- a. Shri Jaikant Singh, Joint Director General, DGFT
 - b. Shri K. K. Tiwari, Industrial Adviser, D/o Heavy Industry
 - c. Shri K. K. Sinha, Industrial Adviser, D/o Industrial Policy and Promotion
 - d. Shri S. S. Tak, Joint Industrial Adviser, M/o Steel
 - e. Shri A. K. Pandey, Sr. Technical Officer, D/o Revenue
 - f. Shri V. K. Kohli, Deputy Director, O/o Textile Commissioner, Noida
 - g. ShriKrishan Kumar, Deputy Director General, DGFT
 - h. Shri A. K. Gopal, Foreign Trade Development Officer (EPCG. I), DGFT
 - i. Smt. Rekha Sharma, Foreign Trade Development Officer (P-5), DGFT
2. Minutes of the last Meeting held on 10.04.2013 were confirmed.
3. The Committee deliberated upon all the cases and following decisions were taken:

Case No.	Firm's Name and Numbers	EPCG Authorisation No.	Subject	Decision of the Committee
1	M/s Sebacic India Limited, 18/07/AM-14/EPCG-II	3430001801 dated 08.10.2010	Condonation of delay in Submission of Installation certificate	The committee deliberated upon the case and decided to recommend to DG for relaxation under Para 2.5 of FTP to condone the delay in submission of installation certificate. DG has approved the case.
2	M/s Rohit Ferro-Tech Ltd., 18/10/AM-14/EPCG-II	0230007623 dated 06.02.2012	Conversation of EPCG authorization from zero duty to 3% duty scheme	The Committee did not see merit in the firm's justification for conversion of EPCG Authorization from zero duty to 3% duty scheme and decided to reject the case.
3	M/s Tata Steel Ltd, New Delhi 18/10/AM-14/EPCG-II	21 Licences issued during AM -11 to AM - 12	Extension in time for submission of installation certificate	The Committee observed that the firm was given extension of time for installation upto June, 2013 in its meeting held on 23.05.2012 and decided to recommend to DG for relaxation under Para 2.5 of FTP to grant 6 more months from the last commissioning in March 2014 i.e. upto September, 2014 for submission of installation certificate. DG has approved the case.
4	M/s Print House (India) Pvt. Ltd. 18/214/AM-13/EPCG-II	0330006579 dated 09.09.2004 0330007609 dated 10.01.2005	Condonation of delay in submission of installation certificate	The committee deliberated upon the case and decided to recommend to DG for relaxation under Para 2.5 of FTP to condone the delay in submission of installation certificate. DG has approved the case.
5	M/s Simran Enterprises, 01/37/218/20/AM- 14/EPCG-II	0530136555 dated 13.07.2004	Condonation of block- wise EO	The Committee decided to recommend to DG for relaxation under Para 2.5 of FTP to allow condonation from condition of fulfilment of block-wise EO subject to payment of

				composition fee of 2% on duty saved amount in proportion to the shortfall at the end of each block in terms of the provisions of Para 5.8.3 of HBP v1. DG has approved the case.
6	M/s Vipul-S Plastocrafts Pvt. Ltd., 18/212/AM-13/EPCG-II	3130001234 dated 18.07.2005 3130000762 dated 07.07.2004	Extension in EOP and condonation of block-wise EO	The Committee decided to recommend to DG for relaxation under Para 2.5 of FTP to allow condonation from condition of fulfilment of block-wise EO subject to payment of composition fee of 2% on duty saved amount in proportion to the shortfall at the end of each block in terms of the provisions of Para 5.8.3 of HBP v1. The Committee decided to recommend to DG for relaxation under Para 2.5 of FTP to allow Extension in EOP for 2 years on payment of composition fee equal to 2% of proportionate duty saved amount on unfulfilled EO or an enhancement in EO imposed to the extent of 10% of total EO at the choice of exporter, for each year of extension sought in terms of provisions contained in Para 5.11 of HBP Vol. I. DG has approved the case.
7	M/s Pooja Forge Ltd., Firozabad 18/205/AM-13/EPCG-II	0530140789 dated 31.03.2006	Shifting of capital goods imported under EPCG scheme from one unit to other unit.	The Committee decided to allow shifting of Capital Goods from their unit located at Plant-III at 49.8 Mile Stone, Delhi-Mathura Road, PO Bhagola, Palwal, Haryana to Plant II at 14/4, Mathura Road, Faridabad, Haryana subject to condition of submission of IEC and RCMC with both the addresses endorsed on them and submission of fresh installation certificate within 6 months of such transfer.
8	M/s P.P. Rolling Mills Mfg co. Pvt. Ltd, 01/37/218/15/AM-14/EPCG-II	0530146392 dated 11.06.2008, 0530146389 dated 11.06.2008, dated 0530146390 dated 11.06.2008 dated & 0530145585 dated 11.02.2008	Condonation of delay in installation of imported capital goods.	The committee deliberated upon the case and decided to recommend to DG for relaxation under Para 2.5 of FTP to condone the delay in submission of installation certificate. DG has approved the case.
9	M/s Reliance Infrastructure Ltd, Mumbai 18/184/AM-13/EPCG-II	0330029636 dated 01.06.2011 0330029874 dated 30.06.2011 0330030896 dated 21.10.2011	Import of cranes under EPCG scheme	The Committee observed that the MOU does not signify that the firm is providing services and it seems that the cranes are only being hired by them. It was also not clear how the services provided are covered under Para 9.53 of FTP. The Committee, therefore, decided to reject the case.

10	M/s R.K Marble Pvt. Ltd. 18/159/AM-12/EPCG-II	1330000484 dated 05.03.2004	Extension in EOP and condonation of block-wise EO	The Committee observed that condonation of block-wise EO had already been granted to the firm in its meeting held on 30.01.2012. Hence, there is no need for condonation of block-wise EO again. The Committee, however, decided to recommend to DG for relaxation under Para 2.5 of FTP to allow Extension in EOP upto 04.03.2104 on payment of composition fee equal to 2% of proportionate duty saved amount on unfulfilled EO or an enhancement in EO imposed to the extent of 10% of total EO at the choice of exporter, for each year of extension sought in terms of provisions contained in Para 5.11 of HBP Vol. I. DG has approved the case.
11	M/s Pearl Mineral and Mines Pvt. Ltd 18/06/AM-14/EPCG-II	----	Issuance of EPCG authorization for import of Caterpillar 770 G off- highway Truck	The Committee deliberated upon the case in detail and decided to defer the case with the direction to advise to firm to produce a certificate from Automotive Research Association of India (ARAI) that Caterpillar 770 G off-highway Trucks are off-highway trucks.
12	M/s Welmech Engineering Company (Pvt.) Ltd. 18/04/AM-14/EPCG-II	3130005954 dated 06.09.2011	Re-validation of EPCG authorization upto 31.01.2013	The Committee observed that: - M/s Thermax Bacock & Wilcox Energy Solutions Pvt. Ltd. is the Zero Duty EPCG Authorization Holder; - It invalidated the licence in the name of M/s Welmech Engineering Company Pvt. Ltd.; - M/s Welmech Engineering Company Pvt. Ltd. (Advance Authorization Holder) was required to supply capital goods to M/s Thermax Bacock & Wilcox Energy Solutions Pvt. Ltd within 9 months from the date of issue of EPCG Authorization i.e. upto 05.06.2012 which they could not do due to problems with their overseas supplier and they were unaware about the validity of Zero Duty EPCG Authorization as they supplied first time against it; - M/s Welmech Engineering Company Pvt. Ltd. supplied the capital goods upto January, 2013 i.e. they took 6 more months in supplying the capital goods. The Committee, therefore, decided to recommend to DG for relaxation under Para 2.5 of FTP to grant revalidation of EPCG Authorization upto 31.01.2013.

				DG has approved the case.
13	M/s Tata Motors Ltd. 01/37/218/22/AM-14/EPCG-II	0530156137 dated 03.08.2011, 0530157857 dated 07.03.012	Change of Supporting manufacturer and place of installation of capital goods	The Committee deliberated upon the case and decided to recommend to DG for relaxation under Para 2.5 of FTP for change of place of installation from Tata Motors Limited, Jamshedpur to their supporting manufacture TML Drivelines Limited, C/o Tata Motors Limited, Jamshedpur – 831010 subject to submission of requisite installation certificate and endorsement of supporting manufacturer in the EPCG Authorization. DG has approved the case.
14.	M/s PRP Granites. 18/54/AM-11/EPCG-II	3530000034 dated 30.05.2000, 3530000044 dated 26.07.2000, 3530000183 dated 09.04.2002	Nexus certification	The Committee decided to defer the case with the direction to call for details such as Catalogue, Brochure, Technical literature of the machinery and Chartered Engineer Certification for nexus from the firm/RA. RA's comments are also to be invited.
15.	M/s Vedanta Aluminium Ltd. 18/187/AM-13/EPCG-II	63 EPCG authorizations(list enclosed)	Fulfilment of EO by export of 'Aluminium products' instead of export of 'calcined Alumina'.	The Committee observed that the Policy permits EO fulfillment by alternate items upto 50% of the EO in respect of the subject licences. It was also observed that the 'calcined alumina' which is the output is being utilized by the party in his own unit and value added products i.e. 'Aluminium products' are being produced by captively using the 'calcined alumina'. Thus, not only higher foreign exchange is being earned but there is also employment generation and optimum utilization of their other unit. The representative of Department of Revenue held reservations in view of present Policy whereby 50% EO is to be fulfilled by the export of goods manufactured from the CG imported under EPCG. It was felt that there is need to have a Policy for such cases as we had in the past where the EO was enhanced by 50% in cases of value added products were exported for EO fulfillment. The Committee, therefore, decided to defer the case for taking a Policy view as to how EO can be fulfilled in this case i.e. the export product and the value to be considered.
16.	M/s Zamil Air Conditioners India Pvt. Ltd. 18/188/AM-13/EPCG-II	0530145312 dated 02.01.2008	(i) Transfer of EPCG authorization No. 0530145312 dated 02.01.2008 from M/s AGH Industries to M/s	(i) The Committee decided to recommend to DG for relaxation under Para 2.5 of FTP for transfer of EPCG authorization No. 0530145312 dated 02.01.2008 from M/s AGH Industries to M/s Zamil Airconditioners India Pvt. Ltd as all the assets and liabilities of M/s AGH Industries have been taken over by M/s Zamil Air

			ZamilAirconditioners India Pvt. Ltd; (ii) Change of IEC on the said EPCG authorization (iii) Fixation of average EO	Conditioners India Private Limited (formerly known as M/s Advantech Coils Private Limited). Condition of Average EO as applicable on the new Co. will be applicable as per Policy. (ii) & (iii): The Committee decided that the firm should approach RA with these request. DG has approved the case.
17.	M/s CSG Networks Private Limited 01/36/218/100/AM-13/EPCG-I	0530151839 dated 19.04.2010 0530140264 dated 12.01.2006	Amendment against Sr. No. 9 of Condition Sheet (containing the address and other details of supporting manufacturer where CGs were installed) attached to the EPCG Authorization No. 0530151839 dated 19.04.2010 and 0530140264 dated 12.01.2006 and extension in first block of EOP against EPCG Authorization No. 0530140264 dated 12.01.2006	The Committee decided to allow shifting/transfer/installation of Capital Goods from their supporting manufacturer premises to their own manufacturing unit at Plot No. 109-110, Sector-59, Huda Industrial Area, Faridabad. The Committee decided to recommend to DG for relaxation under Para 2.5 of FTP to allow condonation from condition of fulfilment of block-wise EO subject to payment of composition fee of 2% on duty saved amount in proportion to the shortfall at the end of each block in terms of the provisions of Para 5.8.3 of HBP v1 in respect of EPCG Authorization No. 0530140264 dated 12.01.2006. DG has approved the case.
18.	M/s HBD Packaging Private Limited 01/36/218/12/AM-14/EPCG-I	0530136558 dated 13.07.2004	Condonation of Block-wise EO and extension in EOP in respect of EPCG Authorization No. 0530136558 dated 13.07.2004	The Committee decided to recommend to DG for relaxation under Para 2.5 of FTP to allow condonation from condition of fulfilment of block-wise EO subject to payment of composition fee of 2% on duty saved amount in proportion to the shortfall at the end of each block in terms of the provisions of Para 5.8.3 of HBP v1. The Committee decided to recommend to DG for relaxation under Para 2.5 of FTP to allow Extension in EOP for 2 years on payment of composition fee equal to 2% of proportionate duty saved amount on unfulfilled EO or an enhancement in EO imposed to the extent of 10% of total EO at the choice of exporter, for each year of extension sought in terms of provisions contained in Para 5.11 of HBP Vol. I. DG has approved the case.
19.	M/s Birla Furukwa Fibre Optics Limited	1730001004 dated 18.11.2009	Condonation of delay in Installation of Capital Goods in respect of EPCG Authorization No.	The committee deliberated upon the case and decided to recommend to DG for relaxation under Para 2.5 of FTP to condone the delay in submission of installation certificate.

	01/36/218/264/AM-13/EPCG-I		1730001004 dated 18.11.2009	DG has approved the case.
20.	M/s Coffer Construction Technology Private Limited 01/36/218/268/AM-13/EPCG-I	3430001337 dated 14.10.2008	Inclusion of 'Services' in EPCG Authorization in respect of 3430001337 dated 14.10.2008	The Committee observed that the provision of fulfillment of 50% EO through export of other goods manufactured or services provided was introduced in the Policy w.e.f. 01.04.2008 and, therefore, decided to recommend to DG to allow the firm to fulfill EO by rendering other services in the EPCG Authorization from the date of application made to RA with the condition of maintenance of Average EO in respect of other services as well. DG has approved the case.
21.	M/s Mahindra Hinoday Industries Limited 01/36/218/273/AM-13/EPCG-I	3130001620 dated 09.03.2006, 3130005612 dated 24.03.2011 3130000995 dated 13.01.2005	Extension in EOP, Condonation of block-wise EO and permission to use the alternate product for fulfillment of EO and Average EO against EPCG Authorization Nos. 3130001620 dated 09.03.2006, 3130005612 dated 24.03.2011 and 3130000995 dated 13.01.2005	The Committee deliberated upon the case and decided to recommend to DG to allow inclusion of alternate product in respect of all the three licences as per relevant Policy provisions of the corresponding years of issuance of licences. The Committee decided to recommend to DG for relaxation under Para 2.5 of FTP to allow condonation from condition of fulfillment of block-wise EO subject to payment of composition fee of 2% on duty saved amount in proportion to the shortfall at the end of each block in terms of the provisions of Para 5.8.3 of HBP v1 in respect of licence Nos. 3130000995 dated 13.01.2005 and 3130001620 dated 09.03.2006. The Committee decided to recommend to DG for relaxation under Para 2.5 of FTP to allow Extension in EOP for 2 years on payment of composition fee equal to 2% of proportionate duty saved amount on unfulfilled EO or an enhancement in EO imposed to the extent of 10% of total EO at the choice of exporter, for each year of extension sought in terms of provisions contained in Para 5.11 of HBP Vol. I in respect of licence Nos. 3130000995 dated 13.01.2005 and 3130001620 dated 09.03.2006. DG has approved the case.
22.	M/s TV18 Broadcast Limited 18/11/AM-14/EPCG-II	0530137259 dated 21.10.2004	Counting of export of group company for fulfillment of EO in respect of EPCG Authorization No.	The Committee observed that although the provision of fulfillment of EO through exports of other good(s) manufactured or service(s) provided by the same firm/company or group company/managed hotel was introduced w.e.f. 28.01.2004, the benefit is granted from the

			0530137259 dated 21.10.2004	date of application made for such benefit. Since the Company has requested for grant of benefit from the date of issuance of authorization, the Committee decided to recommend to DG for relaxation under Para 2.5 of FTP for counting of exports of group company for fulfillment of EO against EPCG Authorization No. 0530137259 dated 21.10.2004 subject to the condition that Average EO will be refixed and the RA will examine the parameters of Group Company as per Policy. DG has approved the case.
23.	M/s Punj Lloyd Limited 18/201/AM-13/EPCG-II	0530135235 dated 18.11.2013	Counting of export of other services for fulfillment of export obligation in respect of EPCG Authorization No. 0530135235 dated 18.11.2013	The Committee decided to defer the case with the direction to call for details regarding proof of realization from the Regional Authority i.e. how EO has been fulfilled and on what specific issue approval of HQ is sought.
24.	M/s Tata Steel Limited 18/78/AM-13/P-5	A/F	Issuance of EPCG Authorization for import of transformer	The technical members of the Committee confirmed that transformers are not used for power generation and are used for stepping up or down of voltage. These Transformers are also not related to transmission. This is needed for this industry. The Committee, therefore, decided to recommend to DG to allow import of transformers under EPCG Scheme subject to the condition that the export product 'Ferro Chrome' to be indicated in IEM. DG has approved the case.
25.	M/s Precious Coating Private Limited 18/176/AM-13/EPCG-II	1330003175 dated 13.10.2011	Shifting of CGs imported under EPCG Scheme from one unit to other unit in respect of EPCG Authorization No. 1330003175 dated 13.10.2011	The Committee decided to allow shifting of Capital Goods from their unit located at E-46, EPIP, Gems & Jewellery Zone, Sitapura Industrial Area, Jaipur to G1-31, EPIP, Gems & Jewellery Zone, Sitapura Industrial Area, Jaipur subject to condition of submission of IEC and RCMC with both the addresses endorsed on them and submission of fresh installation certificate within 6 months of such transfer.
26.	M/s Payorite Print Media Private Limited 18/124/AM-13/EPCG-II	1330000720 dated 15.09.2004	Shifting of CGs imported under EPCG Scheme from one unit to other unit in respect of EPCG Authorization No. 1330000720 dated 15.09.2004	The Committee decided to allow shifting of Capital Goods from their unit located near Hotel Green View International, GulabGagh Road, Udaipur to the unit located at F-20, Road No. 12, Near Power House, MIA(Extension), RIICO, Udaipur subject to condition of submission of IEC and RCMC with both the addresses endorsed on them and submission of fresh

				installation certificate within 6 months of such transfer.
27.	M/s Laasma Power Private Limited 01/36/218/22/AM-14/EPCG-I	0930006338 dated 07.10.2010	Permission for installation of Capital Goods imported against EPCG Authorization No. 0930006338 dated 07.10.2010 at a different location and condonation of delay in installation	The Committee decided to allow installation of the machinery at the new address located at Sy. No. 302 & 303, Wadiaram Village, Changuntamandal, Medak District instead of the address (Sy. No. 244, Plot No. 1&3, Pipe Line Road, Subhash Nagar, IDA, Jeedimetla, Hyderabad) endorsed in EPCG Authorization subject to the condition that submission of IEC and RCMC with both the addresses endorsed on them and submission of fresh installation certificate within 6 months of such installation. The committee also decided to recommend to DG for relaxation under Para 2.5 of FTP to condone the delay in submission of installation certificate. DG has approved the case.
28	M/s Karan Motors Pvt. Ltd., 01/36/218/08/AM-14/EPCG-1	0530140907 dated 20.04.2006	Condonation of delay in obtaining Installation Certificate in respect of EPCG Authorization No. 0530140907 dated 20.04.2006	The committee deliberated upon the case and decided to recommend to DG for relaxation under Para 2.5 of FTP to condone the delay in submission of installation certificate. DG has approved the case.
29	M/s Corporate Power Ltd., 01/36/218/73/AM-12/EPCG-1	0230003383 dated 18.06.2008	Reinstatement of EPCG Authorization No. 0230003383 dated 18.06.2008 (Duty saved amount Rs. 18,41,94,743) issued for procurement of Capital Goods for a upcoming Power Project in Chandwa, Ranchi	The Committee observed that the party has requested for (a) Withdrawal of the decision of cancellation of EPCG Licence for import of HR Coils/Steel as capital goods; (b) Treatment of supply of Power to SEZ units at par with Physical export of goods; (c) Spelling out of the documentation for evidencing export of power; (d) Fixation of EO on the basis of actual duty saving amount which is only Rs. 1.05 Crores as against Rs. 18.41 Crores endorsed on EPCG Authorization; (e) Grant of PH to close the issue in time bound manner. The Committee deliberated upon the case in detail and decided to reject it.
30	M/s DiaAlumuniam India Pvt. Ltd., 01/36/218/11/AM-14/EPCG-1	3130001051 dated 23.02.2005	Extension in EOP in respect of EPCG Authorization No. 3130001051 dated 23.02.2005	The Committee decided to recommend to DG for relaxation under Para 2.5 of FTP to allow Extension in EOP for 2 years on payment of composition fee equal to 2% of proportionate duty saved amount on unfulfilled EO or an enhancement in EO imposed to the extent of

				10% of total EO at the choice of exporter, for each year of extension sought in terms of provisions contained in Para 5.11 of HBP Vol. I. DG has approved the case.
31	M/s Emami Paper Mills Ltd. 01/36/218/124/AM-13/EPCG-1	32 licences of AM-12	Extension in time for 3 years for installation of 2nd Hand Capital Machinery and subsequent submission of Installation Certificate-Request made in respect of 32 EPCG Authorizations issued to M/s Emami Paper Mills Limited	The Committee observed that: - The firm is still in the process of procurement of machinery; - As per para 5.3.1 of HBP v1, a firm is required to furnish Installation Certificate within 6 months from the date of completion of import. The Committee therefore opined that the request of the firm is premature.
32	M/s Merritronix Private Limited 01/36/218/234/AM-12/EPCG-1	0930000326 dated 02.05.2002	Condonation of shortfall in fulfilment of Export Obligation against EPCG Authorization No. 0930000326 dated 02.05.2002 issued to M/s Merritronix Pvt. Ltd., Hyderabad	The Committee observed that there is a shortfall in Average EO in the year 2003-04 and 2008-09 only. During the remaining years they have not only fulfilled the shortfall in Average EO for the year 2003-04 but also made excess exports for fulfilment of entire EO (Average EO + specific EO). The Committee, therefore, recommended to DG for relaxation under Para 2.5 of FTP for condonation of shortfall in Average EO for the year 2003-04 and 2008-09 which was fulfilled in remaining blocks and block-wise condonation of shortfall in specific EO. However, for shortfall in specific EO, the firm will be required to pay composition fee of 2% on duty saved amount in proportion to the shortfall at the end of each block in terms of the provisions of Para 5.8.3 of HBP v1. DG has approved the case.
33	M/s Apex Jewel Diam Private Limited. 01/36/218/186/AM-13/EPCG-1	0330000909 dated 27.02.2001	Nexus in respect of EPCG Authorization No. 0330000909 dated 27.02.2001 issued to M/s Apex Jewel Diam Private Limited	The Committee observed that: - The EPCG Authorization was issued to the firm for import of capital goods with the condition to export "cut and polished diamonds and studded gold jewellery"; - After issuance of the authorization the details of issuance of Licence was forwarded to the Hqrs. EPCG Committee for nexus approval; - The EPCG Committee in its meeting dated 18.10.2001 certified the nexus subject to amendment in export item as "cut and polished diamond"; - the firm was informed by the RA regarding the approval of nexus by the EPCG

				Committee and the change of export product as 'cut and polished diamonds' on 21.12.2001; e. The firm vide its letter dated 28.10.2002 submitted documents towards EO fulfilment. f. It has been observed that EO has been fulfilled through "plain and studded gold jewellery"; g. The firm has been asked by the RA to fulfil EO through the export product allowed by the EPCG committee. The technical member of the Committee opined that earlier decision of the EPCG Committee (for export of cut and polished diamonds) should be maintained. The Committee, therefore, decided to maintain the earlier decision. -
34	M/s Gayatri Bio organics Ltd. (earlier name M/s starchkem Industries Ltd.) 01/36/218/228/AM-13/EPCG-1	2133270 dated 29.07.1994	a. To issue a suitable letter/order confirming the extension of the period of 12 years for fulfilling the EO as is generally available to units referred to BIFR; b. To permit the Company to export all kinds of Starch Products in addition to the Sorbitol which was originally intended for export in view of unviable export price in international market; and, c. To consider deemed exports also for the purpose of fulfilling EO under the above order.	a. The Committee noted the fact that BIFR has given direction to grant extension in EO period for 7 years to meet the export obligation and the above sanction shall come into effect from 29.05.2008 and, therefore, decided to recommend to DG to grant 7 years extension in EOP from the date of sanction of scheme i.e. 29.05.2008. DG has approved the request. b. The Committee also decided to recommend to DG to allow the firm to export all kinds of Starch Products, to the extent of 50% of the EO, in addition to the Sorbitol from the date of sanction of the scheme subject to refixation of Average EO by Regional Authority. DG has approved the request. c. The Committee observed that the firm's request to consider deemed exports for the purpose of fulfilling EO seems to be covered under Policy and, therefore, decided to advise the firm to approach RA for this which in turn will examine the firm's request under relevant provisions of Policy.
