



# KANDLA PORT STEAMSHIP AGENTS ASSOCIATION

Dt : 02<sup>nd</sup> February 2022.

To,

The Chairman,  
Deendayal Port Trust,  
Gandhidham.

Dear Sir,

Sub: Circular by Dy. Conservator of 01.02.2021 related to Port dues: reg.

Sir, we refer to the subject circular issued by the Dy. Conservator Deendayal Port Trust declaring for the collection of port dues charges effective from 01.02.2022 which is an interim order while the Scale of Rates of 2019 is still in existence as the term of the Tariff legitimacy for 3 years is not yet completed, we therefore request your good office to kindly examine this matter and exercise your authority to hold this circular until the new tariff comes into place for the reasons as under:

1. The Rates and Conditionality were discussed prior fixing the tariff and concluded to be allowed for a term of 3 years. However, with this new conditionality the Port proposes to collect the port dues charges for a vessel going to outer for hatch cleaning and for such instances an estimated number of 400 vessels use this facility in a year as of now which is free of cost because one time port dues is already been paid. However if newly payment is additionally charged an estimated amount of Rs.40 crores will be an additional revenue to the Port which was actually not accounted at the time of tariff fixation and demanding this amount interim without any loss of revenue to port is totally unjustified.

2. While discussion during the tariff fixation it was concluded that a vessel coming to kandla may pay port dues on each entry however this also clarifies by the notes of Chapter (2) point no.(10) that : **"single port dues per visit/call at port should be levied even incase the vessel arrives from different terminals i.e. Kandla, Tuna and Vadinar "**. Herein it is very clear that if a vessel is coming from Vadinar to



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Seva Sadan-III,  
Deendayal Port Trust  
New Kandla - 370 210

02-02-22

REGN. No. F-59 KUTCH

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Kandla or Tuna no additional port dues will be applicable. This also confirm and approves that the voyage between Vadinar and Kandla is beyond Port limit , therefore this said circular is totally in contradiction with the provision laid down in the Scale of Rates. because being in the same port is now demanding new port dues charges if going to outer port limit for hatch cleaning.

3. A visit or a call to any port can also be defined as under:
  - a. Vessel calling a Port for both import and export.
  - b. Vessel calling a port for import and export and sailing out with a port clearance but again entering the port for bunkers(Chapter 2 notes point no.7).
  - c. Vessel taking a permission going to outer (without port clearance) for hatches cleaning and returning back either to Kandla or Tuna.
  - d. Vessel if not called any other port and re-arrives Kandla (within 7 days of sailing ) for cargo operations. Though a port clearance was taken.
4. Former to year 2000 the Port dues once paid was valid for 30 days and this was changed to " each entry " because during those times the berthing delay was more than for 20 to 30 days and all vessels had to make double payment therefore to avoid double payment this new clause was brought in the tariff. However the action by the port for recovering Rs. 40 crores in a year without any trade discussion or any deficit is totally injustice and deviating from the tariff (scale of rates) commitment.
5. The activity of import/cleaning of hatches/export in a port is called 1 voyage and because Deendayal Port Trust is situated in the inner gulf vessels which required hatch cleaning has no option but to proceed to outer gulf as for the Marpol Regulations, but this activity is not called as a vessel sailed from the port and compelling to take Port clearance is against regulations where a facility is available with the Port and customs and all statutory bodies that all this activity is considered as one voyage/1 port call. (even the PCS have a system of Dual agency format)



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In view of the above we request you to kindly hold this circular and allow the prevailing practice to be in force which is as under:

" A Vessel which is programmed to discharge and load the cargo from Kandla/Tuna/Vadinar to be considered under 1 VCN and after discharge if a vessel requires hatch cleaning to be conducted at the outer port limit as per the Marpol port regulations. It is to be permitted by a formal information (letter) to Kandla Tower which will keep a record of a vessel movement in and out" and this facility is not illegal.

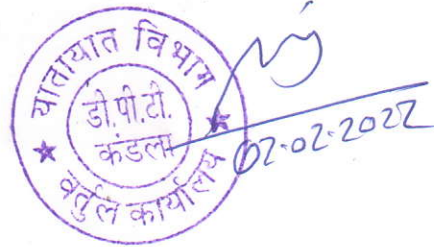
Thanking You,

Yours faithfully,  
For Kandla Port Steamship Agents Association,

  
President



Cc : To, The Dy.Chairman, Deendayal Port Trust, Gandhidham.  
To, The Dy.Conservator, Deendayal Port Trust, Gandhidham.  
To, The Traffic Manager, Deendayal Port Trust, Kandla.  
To, The Harbour Master, Deendayal Port Trust, Kandla.



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