

Frequently Asked Questions (FAQs) on the EMI Scheme – For Trade & Industry

Section 1: Introduction

1. What is the Eligible Manufacturer Importer (EMI) Scheme?

It is a trade facilitation measure that expands the duty deferral framework for a new class of manufacturer importers. Refer the circular no. 08/2026-Customs dated 28.02.2026 for details.

2. Why did Government introduce a new class of “Eligible Manufacturer Importers” separately?

This was introduced to support Make in India by improving ease of doing business, lowering cost of compliance, increasing cash liquidity and to encourage their transition to AEO status.

3. Which legal provision governs the EMI scheme?

EMI Scheme is governed by the Notification No.12/2026-Customs (NT) dated 01.02.2026 issued under the second proviso to Section 47(1) of the Customs Act, 1962.

4. What is the benefit under the EMI Scheme?

It allows the facility of Deferred Payment of Import Duty for release of imported goods. Refer Notification nos. 12/2026-Customs and 13/2026-Customs both dated 01.02.2026 for details.

5. What is the Deferred Payment of Import Duty facility?

It refers to the facility provided under Deferred Payment of Import Duty Rules 2016 (as amended). It allows the clearance of imported goods without making immediate payment of applicable Customs duties to Government.

6. What is the period of deferment of import duty?

The payment is required to be made on monthly basis instead of transaction wise. For details please refer to the Deferred Payment of Import Duty (Amendment) Rules 2026, issued vide

Notification no. 13/2026-Customs dated 01.02.2026.

7. Who is an “Eligible Manufacturer Importer”?

“Eligible Manufacturer Importers” are a separate class of manufacturer importers who are approved by the Directorate of International Customs for availing the deferred payment of import duty.

8. What is the validity of EMI Scheme?

EMI Scheme is valid for a limited period up to 31.03.2028.

9. Why is the facility for Eligible Manufacturer Importers limited up to 31 March 2028?

The limited period acts as a transition window to encourage manufacturers to adopt higher compliance standards and obtain AEO certification for continued benefits.

10. Is the deferred payment facility permanent for ‘Eligible Manufacturer Importers’?

Eligible Manufacturer Importer may continue to avail this facility beyond 31.03.2028 if they

obtain Authorised Economic Operator (AEO T2) certificate before 31.03.2028.

11. Is the EMI scheme only for large importers?

The scheme is available to all manufacturer importers including MSMEs subject to meeting the eligibility criteria mentioned in the Circular No- 08/2026- Customs dated 28/02/2026.

12. I am already an EMI approved entity; can I apply for AEO accreditation?

Yes.

Section 2: Eligibility Criteria

13. Who is an “Importer” under the EMI Scheme?

The applicant must have a valid Importer Exporter Code issued by DGFT.

14. Who is a “Manufacturer Importer” under the scheme?

It refers to an importer who qualifies as a manufacturer under Section 2(72) of the CGST Act, 2017.

15. Are new importers eligible under the EMI Scheme?

Yes, if the importer has filed at least 25 EXIM documents (for MSME 10 EXIM documents) in the previous financial year preceding the date of application.

16. I am an importer but not a manufacturer. Can I apply under the scheme?

Yes, if you send goods for job work under Section 143 of the CGST Act.

17. Are job workers also required to be registered under GST?

Yes, the job worker must have a GSTIN declaring "factory/manufacturing" as their activity.

18. Can a trader of imported goods apply under this scheme?

A trader of imported goods is not eligible to apply under this scheme unless it is also a Manufacturer Importer.

19. Can service providers apply for EMI Scheme?

A service provider is not eligible to apply under this scheme unless it is also a Manufacturer Importer.

20. Is there a turnover threshold for the applicants?

Applicants must have an annual aggregate turnover of Rs. 5 crore or more in the last financial year.

21. Are MSME eligible for the EMI scheme?

Yes. However, an MSME must be registered on the Udyam Portal.

22. Is there any relaxation for MSMEs?

Yes. MSMEs only need to have filed a minimum of 10 EXIM documents in the previous financial year preceding the date of application.

23. Are new businesses/start-ups eligible to apply under the scheme?

Yes. If the business is in existence for at least two financial years.

24. Is GST Registration Required?

The applicant must have at least one active GST Registration. It must have declared in the FORM REG-01 (either Col. 16(d) or Col. 20(d)) of the active GSTIN, the nature of business activity as “factory/manufacturing”.

25. Is GST compliance mandatory?

Yes, Applicants must have filed all the due GSTR-3B Returns as on the date of application.

26. What details are required to be filed in respect of my factories?

Details about the number of factories and the corresponding addresses are required to be submitted.

27. Do I need to upload any documents regarding the property holding rights of my factory?

Yes, a title of ownership of the land or lease deed (as the case may be) is required to be uploaded for the factory mentioned in the application.

28. Do I need to submit any documents regarding the plant and machinery installed in the factory?

Yes, a CA certificate in the format prescribed under Appendix-III of the Circular 08/2026 dated 28.02.2026.

29. Can an insolvent company apply?

No, the applicant must not be currently listed as insolvent, in liquidation, or bankrupt.

30. Is self-declaration sufficient for solvency status?

No, a CA certificate in the format prescribed under Appendix-III of the Circular 08/2026 dated 28.02.2026 is required to prove financial solvency.

31. Are Financial Statements also required?

Yes, audited financial statements for the last two financial years are required to be uploaded on the portal.

32. My net current worth and/or net current assets are negative. Am I still eligible to apply?

Yes. However, you must be financially solvent.

33. Can I re-apply if my application was rejected earlier?

Yes. However, if rejection was due to submission of false information or forged documents, then it leads to a permanent bar.

34. Can I apply if my EMI status was suspended previously?

Entities suspended for submission of false declarations or forged documents in the previous application are ineligible to re-apply.

35. Are existing AEO-T1 entities eligible?

Yes, existing AEO-T1 entities can apply if they meet the eligibility criteria for EMI Scheme.

Section 3: Application Process and Manner of Filing

36. How to apply for the EMI Scheme?

The applicants are required to register on the portal www.aeoindia.gov.in. Upon successful registration, they may file the applications on the portal. Applicants may refer to the user guides available on the portal.

37. Under which zone applicant should register under EMI Scheme?

All the Registration under the EMI Scheme is filed in DIC Zone by default.

38. How do I know that my registration has been successfully completed?

An email intimation is sent on the registered email ID.

39. At the time of Registration, whether OTP will be delivered on Mobile number or Email?

The OTP will be delivered on Registered E-mail.

40. My application has been returned, can I resubmit it?

No. However, the applicant may file fresh application.

41. Is an applicant required to submit any physical documents along with the online application?

The applicant is neither required to submit any physical documents nor required to make any visits to any office. The application process is completely online.

42. What are the documents required to be uploaded with the application?

The list of documents required to be uploaded is listed in APPENDIX II to the Circular 08/2026-Customs dated 28.02.2026.

43. How will I know the status of my application?

You may login using your credentials on aeoindia.gov.in and check the status of your application under the tab 'View Application.'

44. Whether any notice will be issued before rejection of an application?

No. If any of the eligibility criteria is not met, the application shall be rejected, and no notice will be served before such rejection. However, an intimation will be sent on the registered mail post rejection.

45. Is there any fee for applying for the scheme?

No fee is required for Registration/ submission of the Application.

46. Whether any Bond and / or Bank Guarantee are required to be submitted by the applicant?

No Bond and Bank Guarantee are required to be submitted by the applicant.

47. My application has been approved; how do I avail the benefit of duty deferment?

Upon approval of application and updation on the ICES System, the applicant may avail the facility of Duty Deferment. A detailed advisory in this regard is available on ICEGATE portal.

48. Is separate approval required for each Customs Station?

No, the approval is valid for all Custom Stations.

49. Can deferred Customs duty be paid before the due date?

The manufacturer importer may very well choose to pay the deferred Customs duty at any time prior to the prescribed due date.

50. Is interest applicable on deferred duty payment?

No interest is payable on the deferred Customs duty payment, provided the duty is paid within the prescribed due date.

51. What happens to the facility of deferred payment of duty if duty is not paid within the due date?

If the applicant fails to make the payment within due date for the first time, he may subsequently pay the duty along with interest. However, the facility of Deferred payment of Duty shall be suspended if the importer fails to pay the duty in full by due date more than once in a period of three consecutive months.

52. Can manufacturer importers use deferred duty payment facility selectively for some consignments and transactional duty payment for other consignments?

Yes, they may choose deferred or transactional payment of Customs duty on a Bill of Entry as per their requirement / discretion.

53. Is payment of IGST also covered under deferred duty payment scheme?

Yes, payment of IGST is also covered under deferred duty payment scheme.

54. Will an Eligible Manufacturer Importer also become eligible for greater Customs facilitation and priority in assessment/examination?

No, an Eligible Manufacturer Importer does not become eligible for greater facilitation and priority in assessment/examination. This facility is available only to AEO accredited entities.

55. Is there a monetary cap on the amount of duty under the deferred duty facility?

There are no monetary caps on deferred duty facility.

56. Whether this deferred payment facility also applies to Domestic Tariff Area (DTA) clearances from bonded warehouses under the MOOWR scheme (Section 65 of the Customs Act)?

The clearance of imported goods for home consumption is governed by Sec 47 of the Customs Act. On the other hand, clearance of the bonded (warehoused) goods at the time of ex-bond is governed by Sec 68 of the Customs Act. The second proviso to Sec 47(1) enables making of rules to provide for deferred payment of duty to a certain class of Importers, but there is no such provision under Section 68. Thus, the facility of duty deferment to EMIs which has its basis on the duty deferment rules enacted under Sec 47(1) will not be available for ex-bond clearance of goods for home consumption.

57. If an importer files multiple Bills of Entry across different ports in the same month, is duty payable for different ports consolidated for payment?

Yes, under the Deferred payment of Duty facility, all such duty payable is consolidated.

58. If an importer anticipates inability to pay by due date, can an extension be sought?

No extension is provided for duty payment. However, duty along with interest can be paid by the entity after due date.

59. Who else are eligible for the Deferred Payment of Import Duty?

This facility is also available to the following entities, apart from the Eligible Manufacturer Importers:

- a) Authorised Economic Operators (AEO Tier-Two and Tier-Three)
- b) Authorised Public Undertakings

Section 4: Suspension of Approval

60. Is the approval granted under EMI scheme permanent?

No, the approval can be suspended by the Principal Commissioner, DIC. Refer the circular no. 08/2026-Customs dated 28.02.2026 for details.

61. When can the EMI status be suspended?

If an entity becomes ineligible or is found to have submitted false information/forged document in their application.

62. How will I be notified of suspension of EMI status?

An email intimation would be sent on the registered email ID. Further, the status may also be checked on the portal.

63. Can a suspended entity re-apply?

Yes. If the suspension is on account of ineligibility, then upon becoming eligible, the entity can make an application. However, if suspension is due to submission of false information or forged document, then the entity is permanently barred from applying.

64. My AEO Application has been rejected/expired, am I eligible to apply under the EMI Scheme?

Yes, if you fulfil the eligibility criteria of EMI Scheme.

65. Is there any Helpline / Helpdesk to clarify doubts and / or hand hold the EMI Applicants?

Yes, DIC has set up a dedicated Helpdesk
Phone Number: 011-23310014 and dedicated
Helpdesk Email ID: emihelpdesk-dic@gov.in to
assist the EMI applicants / entities.

Issued vide F. No. DIC/POL/DIR/3/2026-POL-O/o Pr. Commr-DIC-Delhi dated 14-03-2026

By

Directorate of International Customs
Central Board of Indirect Taxes and Customs
Ministry of Finance
Government of India