

We have received numerous questions at various briefing sessions about the Advance Filing Rules on Maritime Container Cargo Information scheduled to enter into force in March 2014. We provide our response of the most frequently asked questions to assist interested parties in fully understanding the rules.

Q 1: What is the reason for introducing the Advance Filing Rules on Maritime Container Cargo Information?

A 1: Realizing the need to have more stringent border security measures in place, we will introduce the rules to enhance our security level of international logistic up to the international standard and to prevent terrorism and transnational organized crimes by screening detailed maritime container cargo information received at an early stage.

Q 2: What kind of cargo is required to be filed?

A 2: Any maritime container cargo to be loaded on a foreign trading vessel intended for entry into a port in Japan will be required to be filed. However, empty containers, and platform containers which don't fall under the definition of containers provided for in Article 1(b) of Customs Convention on Containers (Convention No. 6 of 1971), will be exempted.

In addition, maritime container cargoes not to be discharged in Japan will also be exempted from being filed until the rules are well-established, at the beginning of the rules introduced.

Q 3: Is only maritime container cargo carried by a container vessel required to be filed?

A 3: Regardless of the type of vessel, any maritime container cargo to be loaded on a foreign trading vessel intended for entry into a port in Japan will be required to be filed. Therefore, maritime container cargoes carried by other vessels than a container vessel will also be required to be filed.

Q 4: Who are obliged to file cargo information (hereinafter referred to as “filers”)?

A 4: Shipping companies will be obliged to file cargo information, who are the contractors of carriage and know the cargo information based on Ocean (Master) B/L level at the time of departure from a port of loading on a foreign trading vessel intended for entry into a port in Japan. In addition, consignors such as a NVOCC, who know the cargo information based on House B/L level at the time of departure, will also be obliged to file cargo information. However, until the rules are well-established, at the beginning of the rules introduced, those consignors who are the contractor of consigned freight forwarding business with the shipping companies will be obliged to file cargo information.

Q 5: Do service providers become the filers?

A 5: In order to comply with the rules, the filers can send cargo information through the service providers, etc., who are permitted to connect with Nippon Automated Cargo and Port Consolidated System (NACCS), without entering into a direct service agreement with NACCS Center.

Therefore, service providers are merely considered as a provider offering connection services, etc. when the filers send cargo information through NACCS, and they don't become the filers themselves.

Q 6: Can shipping agents file cargo information?

A 6: Shipping agents can file cargo information on behalf of the filers if an appropriate contract is concluded with the filers. Given the contractual relationship with the filers, when the shipping agents file cargo information to play the same role of providing connection services, etc. as service providers, they need to use the Reporter ID of the filers in filing to NACCS. On the other hand, when they file cargo information as filers, they need to use their own ID. (Shipping agents may be penalized in case of overdue filing.)

Q 7: When is the deadline of filing of cargo information?

A 7: In principle, the deadline is 24 hours before departure from a port of loading because the filers and Japan Customs can confirm the date and time of the departure.

However, in the light of the current circumstances in logistics, in case that relaxed measures apply to certain coastal routes departing from ports of loading in Japan's neighboring countries/areas based on the Pre-arrival filing (the current rules) before entry into a port in Japan, the deadline will be extended by departure from a port of loading.

When the filing is made 24 hours before loading of a cargo on a vessel, shipping companies can receive an advance notice before loading of the cargo and stop loading the cargo on a vessel.

Q 8: Why isn't the deadline 24 hours before loading of cargo like in other foreign countries?

A 8: It is difficult for the filers and Japan Customs to precisely know the date and time of loading of container cargoes on a vessel. Therefore, the date and time of departure from a port of loading, which the filers and Japan Customs can confirm, is adopted for the basis of the time of the filing.

Q 9: What is the reason for adopting relaxed measures for the deadline of filing?

A 9: Given the current circumstances in logistics, in response to strong demands for creating relaxed measures by public comments, etc., we decided to adopt relaxed measures for the deadline of filing concerning some shipping routes within the seas around Japan to the minimal extent necessary, which are difficult to be modified to adjust a form of logistics to the new system by the rules enter into force but are able to be ensured a certain level of security assurance in conducting risk analysis by Japan Customs, until the rules are well-established.

Q 10: When is the deadline for transshipped cargo at a port outside Japan?

A 10: The rules require the filers to file cargo information at least 24 hours before departure of a port of loading on a foreign trading vessel intended for entry into Japan. For instance, if a cargo from Europe is transshipped at a port in Singapore, the cargo information is required to be filed at least 24 hours before departure from the port in Singapore.

Q 11: If an unscheduled transshipment of a cargo is conducted due to vessel schedule changes, is it required to be filed not only the cargo information based on Master B/L level from a shipping company, but also the cargo information based on House B/L level from a NVOCC linked to relevant Master B/L at least 24 hours before departure from a port of transshipment?

A 11: Even if an unscheduled transshipment of a cargo is suddenly conducted, as a general rule, both the cargo information based on Master B/L level and the cargo information based on House B/L level are required to be filed again at least 24 hours before departure from a port of transshipment.

Q 12: How was it decided the data elements to be filed?

A 12: Based on the necessary data elements to be filed provided for in the “WCO SAFE Framework of Standards to Secure and Facilitate Global Trade”, we decided the data elements to be filed which should be fulfilled the requirement of risk analysis by Japan Customs in the light of the data elements required by other foreign countries and the results of hearing from interested parties.

Q 13: Is the description of “to order” accepted in the “Consignee” field?

A 13: In the light of the results of hearing from interested parties, if the concrete name, address and telephone number are appropriately filled in the fields relevant to the “Notify Party”, the description of “to order” is accepted in the “Consignee” field.

Q 14: Is it difficult for the filers outside of Japan to fill in the “Harmonized System Code (6-digit)” field?

A 14: The “Harmonized System Code (6-digit)” is an indispensable element for Japan Customs to conduct risk analysis. As the “Harmonized System Code (6-digit)” is used over the world, we think that the filers can fill in the “Harmonized System Code (6-digit)”.

Q 15: If the “Harmonized System Code (6-digit)” field is filled in, is it unnecessary to report the concrete and detailed description in the “Description of Goods” field?

A 15: As the “Description of Goods” field is crucial for Japan Customs to conduct risk analysis, concrete and detailed description is needed to easily identify the contents of the cargo.

In addition, in case that several goods are loaded in a container, not only the description of main goods but also the description of other goods are needed to be filed in the “Description of Goods” field.

Q 16: What is the difference between the “Port of Origin” and the “Port of Loading”?

A 16: When transshipment is scheduled, the port where cargo is firstly shipped for Japan becomes the “Port of Origin”, while the port where the cargo is transshipped from one vessel to another which intended for entry into Japan becomes the “Port of Loading”.

Q 17: Can the filed cargo information be corrected?

A 17: As cargo information to be filed in the rules is the scheduled information of a cargo to be loaded, it could be included unfixed information. Therefore, in the light of the results of hearing from interested parties, the filed cargo information can be corrected, where necessary, in principle until the “Departure Time Registration (ATD)” is completed.

However, the system does not allow the “Carrier Code”, “Vessel Code”, “Voyage Number”, “Port of Loading” and “B/L Number” to be modified.

Q 18: When the necessary correction is made through the “Registered Advance Cargo Information (CMR)” or the “Update Registered Advance Cargo Information (House B/L) (CHR)”, is it necessary to contact Japan Customs in advance?

A 18: As the filed cargo information in the rules can be corrected, where necessary, it is not necessary to contact Japan Customs in advance.

However, the system does not allow the “Carrier Code”, “Vessel Code”, “Voyage Number”, “Port of Loading” and “B/L Number” to be modified.

Q 19: Cannot any filed cargo information be corrected after the “Departure Time Registration (ATD)” was completed?

A 19: After the “Departure Time Registration (ATD)” is completed, only the cargo information, to which an advance notice of risk analysis results has been given, can be corrected through the “Update Registered Advance Cargo Information (CMR)” or “Update Registered Advance Cargo Information (House B/L) (CHR)”. Therefore, necessary corrections must be completed by the time the “Departure Time Registration (ATD)” is done.

Q 20: If transshipment is suddenly conducted after cargo information was filed, is it necessary for the previously filed cargo information to be deleted?

A 20: Without deleting the previously filed the cargo information, cargo information is needed to be filed again through the “Advance Cargo Information Registration (AMR)” or the “Advance Cargo Information Registration (House B/L) (AHR)” by the deadline of filing at a port of transshipment.

Q 21: How to deal with the case if cargo information cannot be filed by the deadline because of a system outage?

A 21: The filers need to contact the previously designated contact point of Japan Customs. In case that Japan Customs recognizes the difficulties in electronically filing cargo information through NACCS because of electronic or communication problems, etc., the filers need to file cargo information in writing by the deadline of filing according to the instruction of Japan Customs.

However, it is exempted from filing in case of the difficulties occurred due to natural disasters such as an earthquake, etc. or man-made disasters such as a war, etc.

Q 22: How soon does Japan Customs notify the filers of risk analysis results?

A 22: In principle, Japan Customs will notify the filers of risk analysis results within 24 hours after the cargo information is filed.

Therefore, when the filing is made 24 hours before loading of cargo, shipping companies can receive an advance notice before loading of cargo on a vessel and stop loading the cargo.

Q 23: Does Japan Custom notify the filers of a green light for loading of cargo as a result of risk analysis?

A 23: No advance notice will be sent to the filers unless the cargo is considered as security threats. Meanwhile, the filers will be notified of the “DNL” or the “DNU” when the cargo is identified high-risk as a result of risk analysis, or the “HLD” when additional information or correction of the filed cargo information is required.



Q 24: What is the reason for retaining the Pre-arrival filing (the current rules) before entry into port in Japan?

A 24: Cargo information to be filed in the Pre-departure filing (the new rules) is the scheduled information of cargo to be loaded on a vessel intended for entry into Japan. At the time of deadline of filing, some unfixed information such as quantity of cargo could be included.

Therefore, as Japan Customs needs to confirm whether the cargo, whose information was filed in the Pre-departure filing (the new rules), is actually loaded and to be unloaded at a port in Japan, we will continue to require the shipmaster who is ultimately responsible for the information of cargo loaded on a foreign trading vessel to file as well according to the Pre-arrival filing (the current rules).

In order to reduce administrative workload on filing, the filed cargo information in the Pre-departure filing (the new rules) will be able to be reused on NACCS as part of the cargo information required in the Pre-arrival filing (the current rules) as a new procedure.

Q 25: After filing cargo information in the Pre-arrival filing (the current rules), a port of discharge, etc., which are also included in the data elements of the Pre-departure filing (the new rules), are modified due to the change of vessel voyage schedule caused by bad weather. In case, is it needed to correct not only the filed cargo information in the Pre-arrival filing (the current rules) but also the filed cargo information in the Pre-departure filing (the new rules)?

A 25: In case that the filed cargo information is corrected after the cargo information was filed in the Pre-arrival filing (the current rules), only the filed cargo information in the Pre-arrival filing (the current rules) is required to be corrected unless otherwise advised by Japan Customs.

Q 26: Is a certain notice sent after the “Advance Cargo Information Registration (AMR)” or the “Advance Cargo Information Registration (House B/L)(AHR)” was completed?

A 26: In order to notify of successful process completion, a process result message of “COMPLETION” will be sent.

Q 27: Who conducts the “Departure Time Registration (ATD)”?

A 27: The shipmaster of a foreign trading vessel intended for entry into Japan is obliged to file the date and time of departure from a port of loading as one of the date elements to be filed in the Pre-arrival filing (the current rules).

However, in the light of the results of hearing from interested parties, the “Departure Time Registration (ATD)” will be established so that the shipping company, who keeps updated on the vessel operational information at a port of loading and has to report under the Pre-departure filing (the new rules), can also process the procedure.

Therefore, after the foreign trading vessel departs from a port of loading, the shipping company, who files at the port of loading in the Pre-departure filing (the new rules), will conduct the “Departure Time Registration (ATD)” and then the shipmaster or his/her agent, who needs to file in the Pre-arrival (the current rules) filing, confirms the filed date and time of departure in the “ATD” and make corrections, if necessary.

Q 28: How can the shipmaster, etc. who submits the Pre-arrival filing (the current rules) confirm the date and time of departure in the “Departure Time Registration (ATD)” filed by a carrier, etc. of the foreign trading vessel who submits the Pre-departure filing (the new rules)?

A 28: After completing the “Manifest Registration (MFR)”, the filed date and time of departure from a port of loading in the “Departure Time Registration (ATD)” will be notified as a process result notice. Also, the date and time of departure can be known through the “Inquiry About Advance Cargo Information Registration (IAR)”.

Q 29: By when is the “Departure Time Registration (ATD)” needed to be completed?

A 29: The “Departure Time Registration (ATD)” is needed to be completed by the completion of the “Manifest Submission (DMF)” after a foreign trading vessel departed from a port of loading.

Meanwhile, if the “Departure Time Registration (ATD)” has not been completed when the “Manifest Submission (DMF)” is processed, a discrepancy notice will be sent to notify that the “Departure Time Registration (ATD)” has not been yet completed.

Q 30: How can the system identify a discrepancy concerning the deadline of filing?

A 30: The system will compare the date and time when the “Advance Cargo Information Registration (AMR)” or the “Advance Cargo Information Registration (House B/L)(AHR)” has been submitted with the filed date and time of departure from a port of loading in the “Departure Time Registration (ATD)”. As a result, if the system identifies that cargo information was not filed by the deadline, a discrepancy notice will be sent to the person who conducted the “Departure Time Registration (ATD)”.

Q 31: If a discrepancy notice concerning the deadline of filing was sent, is an advance notice of the “SPD” automatically sent?

A 31: After reviewing the contents of discrepancy notice, Japan Customs identifies whether cargo information was filed or not by the deadline. In case that cargo information was not filed, by the deadline. Japan Customs will send an advance notice of the “SPD” according to each unit of cargo information based on Ocean (Master) B/L.

Q 32: Can other interested parties in Japan than persons who file the “Advance Cargo Information Registration (AMR)” or “Advance Cargo Information Registration (House B/L)(AHR)” know about the contents of advance notice as results of risk analysis conducted by Japan Customs?

A 32: An advance notice of the results of risk analysis will be sent to interested parties in Japan registered in the “Notification Forwarding Party” fields of the “Advance Cargo Information Registration (AMR)” and the “Advance Cargo Information Registration (House B/L)(AHR)”.

In addition, it can be confirmed whether or not an advance notice of the result of risk analysis has been sent through the “Inquiry About Cargo Information (ICG)”.

Q 33: How does the system deal with the cargo of which an advance notice of the DNU is not canceled?

A 33: Unless an advance notice of the “DNU” is canceled, the “Registration of Cargo Discharge (PKI/PKK)” cannot be processed on the system.

Q 34: Is it possible to create import declaration information by using the filed cargo information before departure from a port of loading in “Advance Cargo Information Registration (AMR)” or “Advance Cargo Information Registration (House B/L)(AHR)”?

A 34: When the Advance Filing Rules on Maritime Container Cargo Information enters into force in March 2014, it will not be possible to create import declaration information by using the filed cargo information reported under the rules.

However, we are considering to make it possible to create import declaration information by using the filed cargo information reported under the rules in 2017, when NACCS is renewed.

Q 35: Is one Reporter ID enough for one corporation? Or, is it necessary for each branch office at respective port, etc. to acquire a Reporter ID? Also, if a filer already has a NACCS User ID, does he/she need to newly acquire a Reporter ID for filing cargo information in the Advance Filing Rules on Maritime Container Cargo Information?

A 35: Both batch filing from the headquarters, etc. and filing from each branch office at respective port are supposed to be operated, it is therefore recommended that necessary number of the Reporter IDs should be acquired depending on the circumstances of each corporation.

Also, if a filer already has User IDs through a service agreement concluded with NACCS Center, he/she can use the User IDs for filing cargo information.

Q 36: Who is an authorized service provider permitted to access to NACCS?

A 36: We announce authorized service providers permitted to access to NACCS on the following website.

<http://www.naccs.jp/e/afr/index.html> (NACCS website)

Q 37: How much does it cost to use NACCS new procedures for the Advance Filing Rules on Maritime Container Cargo Information?

A 37: It is under consideration at present. We will make an announcement in due course. Considering the cost the same way as before, we think that filing procedures provided for in the law could be free of charge.

Q 38: How is the Advance Filing Rules on Maritime Container Cargo Information made public?

A 38: In order to promote to make widely public, Japan Customs uploads explanatory documents concerning the rules on the Customs website in English and in Japanese. Also, we endeavor to explain the introduction of the rules in Japan and ask for cooperation to spread the information at international meetings of Customs administration, etc.

In addition, in May and September 2012, we held several briefing sessions to explain the outline of the rules and related procedure specifications, etc. for shipping companies of the foreign trading vessel bound for Japan and relevant Japanese companies. Taking such opportunities, we asked the participants to cooperate to share the information with their foreign business partners and associates.