

It is our humble submission that the e-Way bill Rules currently drafted do not take in to consideration the very nature of time-sensitive express, multi-modal transportation and postal services. The proposed e-Way bill rules has three fundamental concerns:

1. It applies on millions of shipments processed on a daily basis, international (import) consignments on which the duties have been paid at the port of entry or those in transit under bond besides export consignments, for all of which declaration is made to CBEC. Similar is the case of shipments travelling within a state.
2. On a matter related to tax (GST) applicable on a transaction between seller and buyer, massive obligations before conveyance of goods is supposed to be fulfilled by express courier transportation company which is practically impossible for them to do. Thus, the companies will go out of business and every movement of goods will become non-compliant. How would a courier going on foot or bicycle or e-rickshaw to pick up (first mile) and bring the shipments from customer site to his hub in same or another city or going for delivery (last mile) will mention a vehicle number against each INV1. Further, how much would be the delay and cost when for hundreds of shipments belonging to hundreds of different shippers and consignees multiple times in a hub and spoke model new e-Way bills are to be generated and INS-2 forms are to be updated with vehicle number? It is difficult to imagine the cost and delays even in the global supply chains, making India inefficient in transaction costs for international trade and lower its logistics competitiveness ranking.
3. Unlike any other major country in the world, such non value added new sets of data inputs are required to be filed for 100% of shipments on 100% of separate movements in the over all journey without any focus on risk profiling or need based intervention that the door to door express delivery service providers working in time sensitive consolidation environment operate in. It would be pertinent to point out that substantial users of express delivery services(EDS) are from the SME segment and this will impact very adversely both the express industry as well as its users.

There is urgent need to sort out confusion and impractical demands imposed on our industry for nil or insignificant benefits which can possibly be achieved through alternate means. GST should facilitate seamless movement and logistics but the provisions of e-Way bill in current form make it difficult for us and possibly for Government to achieve its broader goal. It would significantly increase delays and impose transaction costs on the transport sector. India is already on the higher end of the transport costs as percentage of GDP (at 12-14% as opposed 6-8% in more competitive economies). The e-Way bill Rules as drafted would complicate the process of change of modes and conveyances.

It is imperative that any rules in this regard are aligned to the idea of seamless and facilitated movement of goods across India's internal (i.e. state) borders - that is one of the key outcomes and expectations of industry at large from the implementation of GST.

In view of the above objective, EICI has identified certain key concern areas in the proposed e-Way Bill Rules that would need due consideration (enclosed herewith as Annexure A). It is our humble request to you to please rationalise the need for e-Way bill and data/inputs by not over engineering the process and putting disproportionate obligations on our industry.

May we humbly request that considering the unique character of the express industry, EICI be involved in consultations with the committee drafting rules and designing any forms so that the long cherished dream of transportation industry for economic growth through introduction of GST does not become a tool which will pave the way for loss of business and jobs due to poor process design.

In case of any queries, EICI would be glad to respond to be the same immediately.

Yours faithfully,  
For Express Industry Council of India

Vijay Kumar  
Chief Operating Officer