



GOVERNMENT OF PAKISTAN
DIRECTORATE GENERAL OF CUSTOMS VALUATION
7TH FLOOR, CUSTOM HOUSE
KARACHI
Phone: 021-99214144

No. Misc/09/2012-III/ /276

Dated: 10-04-2026

VALUATION RULING NO. 2066 / 2026

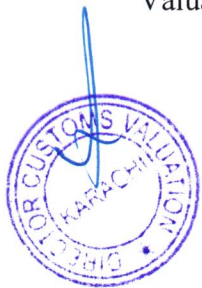
1. This Ruling shall be applicable until the same is rescinded or revised in terms of sub-section (4) of Section 25A of the Customs Act, 1969.
2. The revision petition against this Valuation Ruling, can be filed under Section 25D of the Customs Act, 1969, within 30 days before the Director General, Customs Valuation.
3. The values in valuation ruling shall be applicable to the given description and specification of goods.

SUBJECT: DETERMINATION OF CUSTOMS VALUES OF REFRIGERATION GASES IN BULK AND RETAIL PACKING UNDER SECTION 25-A OF THE CUSTOMS ACT, 1969

Valuation Ruling	This ruling supersedes earlier Valuation Ruling No. 2033/2026 dated 07-01-2026.
Date of meeting with stakeholders	The meeting with relevant stakeholders was conducted on 18-03-2026.

Background of the Issue: The customs values of Refrigeration Gases in Bulk and Retail Packing were determined vide Valuation Ruling No. 2033/2026 dated 07-01-2026 (which had superseded Valuation Ruling No. 1918/2024 dated 20-11-2024). The said Valuation Ruling No. 2033/2026 was challenged before the Director General under Section 25D of the Customs Act, 1969. The Director General, vide Order-in-Revision No. 02/2026 dated 06-03-2026, rescinded the Valuation Ruling No. 2033/2026 with the following observations:

- That upon scrutiny of import data, the customs values determined for subject items at various serials of the impugned Valuation Ruling were found not based on actual import data of representative similar goods. The values of R-125, R-134A, R-141B and R-410A were determined higher than the value of similar and identical goods, not fulfilling the requirement of Section 25(6) of the Customs Act, 1969. Such determination of values is expressly prohibited under Rule 11(c) of Customs Rules, 2001.*
- That in case of multiple items at various serials of the impugned Valuation Ruling, values so determined were not based on actual transactional values of similar goods at same commercial level and at same time. For example, values for R-600A, R-404A and R-32 for China origin were determined on the basis of smaller quantities, not at same commercial level. Therefore, the values so determined were not in accordance with the condition as given in provision of Section 25(6)(a) of the Customs Act, 1969.*
- That the prices of refrigeration gases are highly sensitive to market demand and to quantities purchased, with high-volume purchases significantly lowering the cost per*



unit. The prices of the item also vary in regional markets. Such factors were not taken into account while determination of valuation of the impugned ruling.

- iv. *That the impugned valuation ruling overlooked actual market conditions of refrigeration gases sourced from China, including decreases in price of gases such as R-22 and R-600A, and temporary demand-driven increases in others. The impugned valuation ruling failed to differentiate between gas categories and ignored anticipated post-quota price normalization, rendering the valuation exercise flawed.*

In view of the foregoing legal infirmities and not taking into account the conditions for determination of value as provided under provision of Section 25(6)(a) of the Customs Act, 1969, the values so determined vide Valuation Ruling No. 2033/2026 dated 07-01-2026 were rescinded with the directions to the Directorate to conduct a fresh exercise and determine Customs values of the impugned goods afresh in strict adherence to valuation methods provided in Section 25 of Customs Act, 1969 and relevant rules.

Therefore, a fresh exercise was initiated by the Directorate for the determination of customs values of Refrigeration Gases in Bulk and Retail Packing.

2. Stakeholders Meetings / Representations: Meeting was convened on 18-03-2026, which was attended by the petitioners in Order-in-Revision No. 02/2026 and other relevant stakeholders. The issue pertaining to the valuation of subject goods was deliberated upon in detail in the afore-referred meeting. Detailed submissions made by the participants along with their proposed values were taken into consideration. The importers were requested to submit requisite evidence and documents including Export GDs, Sales Tax Invoices and Sales Tax Returns in support of their contentions. The participants were requested to provide written arguments, literature and other relevant documents before the Directorate in order to finalize the customs values.

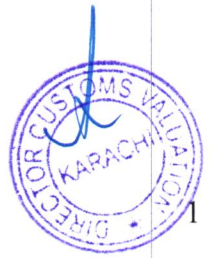
3. Analysis / Exercise done to determine Customs values: The submissions and contentions of the stakeholders were duly examined in the light of the observations of the Director General in Order-in-Revision No. 02/2026 dated 06-03-2026. For the determination of customs values of subject goods, Ninety (90) days' import data was retrieved and the same was thoroughly scrutinized, taking into account the actual transactional values of identical and similar goods at the same commercial level and in substantially the same quantities. International market trends, prevailing prices from Chinese and other origins, and the sensitivities of refrigeration gas pricing to demand fluctuations, quota allocations and volume-based discounts were duly discussed. Moreover, market inquiry has been conducted and examined in terms of Section 25(7) of the Customs Act, 1969 and in the light of this Directorate's Office Order No.17/2014 dated 19-03-2014.

4. Method(s) adopted to determine Customs values: Valuation methods specified in Section 25 of the Customs Act, 1969, were duly applied in sequential order to arrive at the Customs values of subject goods. The transaction value method as provided in sub-section (1) of Section 25 of the Customs Act, 1969, was found inapplicable due to absence of information as required under sub-section (2) of Section 25 of Customs Act, 1969. Therefore, identical goods value method provided in Section 25(5) was examined for applicability to determine Customs values of subject goods. However, it was found that the same could not be solely relied upon due to absence of absolute

demonstrable evidence of quantities and qualities. Information available was, hence, found incomplete. Subsequently, similar goods value method provided in Section 25(6) was also examined for applicability to determine Customs values of subject goods and was not considered (for application) due to afore-stated reasons. Moreover, Declared Values (DV) of similar goods showed consistent variations. Hence, this method was also found inapplicable. Market enquiry as envisaged under Sub-section (7) of Section 25 of the Customs Act, 1969 was also conducted but did not yield tangible results because of variation in market prices. In line with statutory sequential order of section 25, Computed value method, as provided in Section 25(8) of the Customs Act, 1969 was examined, but the same also could not be applied as the conversion cost from the constituent materials and allied expenses, in the country of export, were not available for manufacturing of the said goods. Finally, the Customs values of the subject goods have been determined under Section 25(9), read with Section 25(6) of the Customs Act, 1969 and Customs Rule 121(2) of Customs Rules, 2001 which provides that the methods of valuation, to be employed under sub-section (9) of section 25 of the Act may be inclusive of those laid down in sub-sections (1), (5), (6), (7) and (8) of the said section, but a reasonable flexibility in the application of such methods would be in conformity with the aims and provisions of sub-section (9) of that section.

5. Customs Values for Refrigeration Gases in Bulk and Retail Packing – hereinafter specified shall be assessed to duty / taxes at the following Customs Values: -

Sr. No.	Description of Goods	Origin	PCT	Proposed PCT's for WeBOC	C&F (USD/Kg) (Net Content in Retail Packing)	
(1)	(2)	(3)	(4)	(5)	(6)	
1	R-410A (Difluoromethane / Pentafluoroethane)	China		3827.6100.1000 3827.6300.1000 3827.6400.1000 3827.6500.1000 3827.6900.1000	6.64	
		USA / Europe		3827.6100 3827.6300 3827.6400 3827.6500 3827.6900	3827.6100.1100 3827.6300.1100 3827.6400.1100 3827.6500.1100 3827.6900.1100	9.9
		Other Origins			3827.6100.1200 3827.6300.1200 3827.6400.1200 3827.6500.1200 3827.6900.1200	7.98
2	R-32 (Difluoromethane)	China	2903.4200	2903.4200.1000	8	
		USA / Europe		2903.4200.1100	15	
		Other Origins		2903.4200.1200	11.25	



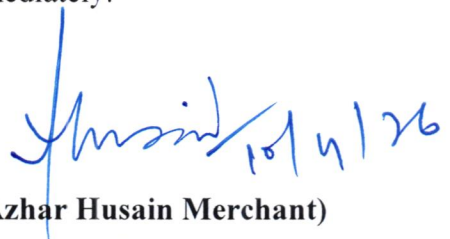
3	R-134A (1,1,1,2-Tetrafluoroethane)	China	2903.4500	2903.4500.1000	6.62
		USA / Europe		2903.4500.1100	10.17
		Other Origins		2903.4500.1200	5.56
4	R-22 (Chlorodifluoro- methane)	China	2903.7100	2903.7100.1000	3.16
		USA /Mexico/ Europe		2903.7100.1100	6.6
		Other Origins		2903.7100.1200	4.35
5	R-404A (Trifluoroethane / Pentafluoroethane / 1,1,1-Trifluoroethane)	China	3827.6100 3827.6300 3827.6400 3827.6500 3827.6900	3827.6100.1300 3827.6300.1300 3827.6400.1300 3827.6500.1300 3827.6900.1300	4.68
		USA / Europe		3827.6100.1400 3827.6300.1400 3827.6400.1400 3827.6500.1400 3827.6900.1400	9.5
		Other Origins		3827.6100.1500 3827.6300.1500 3827.6400.1500 3827.6500.1500 3827.6900.1500	5.84
6	R-600A (Isobutane)	China	2901.1010	2901.1010.1000	3.06
		USA / Europe		2901.1010.1100	5.26
		Other Origins		2901.1010.1200	3.95
7	R-141B (Dichlorofluoro- ethane)	China	2903.7300	2903.7300.1000	2.3
		USA / Europe		2903.7300.1100	6.14
		Other Origins		2903.7300.1200	4.61
8	R-290 (Propane)	China	2711.1200	2711.1200.1000	3.04
		USA / Europe		2711.1200.1100	6.6
		Other Origins		2711.1200.1200	4.95
9	R-125 (Pentafluoroethane)	China	2903.4400	2903.4400.1000	6.36
		USA / Europe		2903.4400.1100	12.72
		Other Origins		2903.4400.1200	9.54



10	R-407C (Difluoromethane / 1,1,1,2- Tetrafluoroethane)	China		3827.6100.1600	3.89
				3827.6300.1600	
				3827.6400.1600	
				3827.6500.1600	
				3827.6900.1600	
		USA / Europe	3827.6100	3827.6100.1700	9.5
			3827.6300	3827.6300.1700	
			3827.6400	3827.6400.1700	
			3827.6500	3827.6500.1700	
			3827.6900	3827.6900.1700	
		Other Origins		3827.6100.1800	5.67
				3827.6300.1800	
				3827.6400.1800	
				3827.6500.1800	
				3827.6900.1800	

NOTE: The customs values determined in the above table are applicable to the subject goods when imported in cylinders. In case the subject goods are imported in bulk, i.e. returnable ISO tanks, US\$ 0.26/Kg shall be subtracted, for assessment purposes, from the aforementioned determined values.

6. In cases where declared values or values in invoice retrieved from the consignment, as the case may be, are higher than the customs values determined in this valuation ruling, the assessment shall be made on higher values in terms of sub-section (1) of Section 25 of the Customs Act, 1969.
7. In case of consignments imported by air, the difference between air freight and sea freight shall be added for the assessment of value.
8. The Valuation Ruling shall be applicable for the descriptions and specifications of goods as mentioned in the aforementioned table. HS Codes are mentioned for illustrative purposes.
9. The Collectorates of Customs shall ensure the implementation of Valuation Ruling and in case of any anomaly may be brought to the notice of this Directorate immediately.


(Azhar Husain Merchant)
Director

Copy for necessary action and implementation:

The Collectors / Directors of Customs, Collectorates / Directorates of Customs (Appraisalment-West / East / SAPT / PMBQ / JIAP / Enforcement/), Karachi / Hyderabad / (Appraisalment / Enforcement / Ports), Quetta / Gwadar / Khuzdar (Appraisalment / Enforcement / AIIA), (Appraisalment-East / West, Lahore / Faisalabad Appraisalment / Enforcement, Sargodha / Enforcement & Appraisalment, Sambrial (Sialkot) / Enforcement, Multan / Islamabad / Gilgit-Baltistan / (Appraisalment/ Enforcement), Peshawar / Enforcement, Dera Ismail Khan / Exports (Port Qasim/Custom House, Karachi) / Transit Trade, Karachi.

Copy for information:

- 1) The Member Customs (Operations), F.B.R., Islamabad.
- 2) The Director General, Customs Valuation, Custom House, Karachi.
- 3) All Chief Collectors / Director Generals of Customs, Karachi / Lahore / Islamabad / Quetta / Peshawar.
- 4) All Collectors / Directors of Customs, Karachi / Lahore / Islamabad/ Quetta/ Peshawar/ Faisalabad.
- 5) The Director, Directorate of Customs Valuation, Lahore / Quetta / Peshawar.
The Deputy Director (MIS), Directorate General of Customs Valuation, Karachi, for uploading in One Customs & WEBOC database system.
The Chairman (Valuation Committee), FPCC&I, Federation House, Clifton, Karachi.
The Chambers of Commerce & Industry, Karachi, Lahore, Islamabad, Hyderabad, Quetta & Peshawar.
- 9) The Karachi Customs Agents Group, Bohri Road, Karachi.
- 10) The Webmaster, Federal Board of Revenue, Islamabad.
- 11) Guard File.

