



GOVERNMENT OF PAKISTAN  
DIRECTORATE GENERAL OF CUSTOMS VALUATION  
7<sup>TH</sup> FLOOR, CUSTOM HOUSE  
KARACHI  
Phone: 021-99214144  
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No. Misc/43/2017-VII/ 1770

Dated: 15.07.2025

**VALUATION RULING NO. 2009 / 2025**

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 This Ruling shall be applicable until the same is rescinded or revised in terms of sub-section (4) of Section 25A of the Customs Act, 1969.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 VALUE OF GAS / ELECTRIC WATER HEATER UNDER SECTION 25A OF THE CUSTOMS ACT, 1969.**

1.	Valuation Ruling	This Valuation Ruling supersedes Valuation Ruling No. 1967/2025 dated 06.02.2025
2.	Date of meetings with stakeholders	The meetings with relevant stakeholders were conducted on 14.05.2024 & 12.06.2025

4. **Background of the Issue:** Some stakeholders challenged Sr. No. 1 of the aforementioned Valuation Ruling on the grounds that they import Electric Water Heaters of higher capacities, whereas the existing assessed values appear to reflect the pricing of lower capacity models. The Directorate General of Customs Valuation, through its Order-in-Revision dated 24.04.2025, remanded the Valuation Ruling with directions to duly address the concerns of the petitioners. The Director General instructed that all relevant documents, including copies of contracts and other documentary evidence, be taken into consideration for a fair re-evaluation of the determined values.

5. **Analysis to determine Customs Values:** In accordance with the directives issued by the Director General, meetings were convened on 14.05.2024 and 12.06.2025 to re-evaluate the customs values of the subject goods. The meetings were attended by the relevant stakeholders along with their legal counsel. During the proceedings, the stakeholders were specifically asked to submit their supply contract and provide all relevant documentary evidence to assist in the determination of values for the goods concerned, as outlined in the Order-in-Revision. The stakeholders submitted supply contract, however the contract does not provide a detailed break-up of contract sum. Furthermore, they did not submit a list of the directors despite showing willingness during the meeting.

6. **Method(s) adopted to determine Customs values:** The valuation methods specified in Section 25 of the Customs Act, 1969, were duly considered in sequential order to arrive at the customs values of the subject goods. The declared/transaction values, as laid down under sub-section (1) of Section 25 ibid, were found inapplicable, as the importers did not furnish any documentary evidence to establish that the declared values represented true transactional values. Further, as mentioned products with varying composition and, hence, with varying international and domestic prices are being cleared at more or less same values. The methods based on the values of identical or similar goods, as outlined in sub-sections (5) and (6) ibid, were also examined for applicability. However, the import/clearance data reviewed could not be relied upon due to variations in declared values and the presence of multiple types, qualities and quantities being imported and sold at a commercial level compounded by concerns of group under-invoicing. Consequently, the available information was deemed inappropriate for determining customs values. Market enquiries, as envisaged under sub-section (7) of Section 25 of the Customs Act, 1969, were therefore conducted, along with some references to international prices of the goods in question available online. Accordingly, the customs values of the subject goods have been determined under Section 25(7) of the Customs Act, 1969.

**Customs Values of Gas / Electric Water Heater:** - In view of above the transaction value shall be the Customs value for assessment of duty & taxes given against them.

S. No	Description	Brands	PCT Code	Proposed PCT Codes	Origin	Customs Values US\$/Litre
1	Electric Water Heater (Upto 50 Litres)			8516.1010.1000	China/Middle East	2.70
				8516.1090.1000	Other Origins	3.20
2	Electric Water Heater (51 to 100 litres)	All Brands	8516.1010 8516.1090	8516.1010.1100	China/Middle East	2.10
				8516.1090.1100	Other Origins	2.50
3	Electric Water Heater (101 to 150 litres)			8516.1010.1200	China/Middle East	1.70
				8516.1090.1200	Other Origins	2.10
4	Electric Water Heater (151 litres and above)			8516.1010.1300	China/Middle East	1.50
				8516.1090.1300	Other Origins	1.80
5	Gas Water Heater	All Brands	8419.1110 8419.1190	8419.1110.1000	China	3.40
				8419.1190.1000	Other Origins	4.20
6	Hybrid Water Heater (Gas + Electric)	All Brands	8516.1010 8516.1090 8419.1110 8419.1190	8516.1010.1400	China	3.80
				8516.1090.1400 8419.1110.1100 8419.1190.1100	Other Origins	4.50

8. 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.

9. In case of consignments imported by air, the difference between air freight and sea freight shall be added for the assessment of value.

10. The VR shall be applicable for the description and specifications of goods as mentioned in the aforementioned table. HS Codes are mentioned for illustrative purposes.

11. The Collectorates of customs shall ensure the implementation of VR 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 (Appraisement-West / East / SAPT / PMBQ / JIAP / Enforcement/), Karachi / Hyderabad / (Appraisement / Enforcement / Ports), Quetta / Gwadar / Khuzdar (Appraisement / Enforcement / AIIA), (Appraisement-East / West, Lahore / Faisalabad Appraisement / Enforcement, Sargodha / Enforcement & Appraisement, Sambrail (Sialkot) / Enforcement, Multan / Islamabad / Gilgit-Baltistan / (Appraisement/ 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.
- 6) The Deputy Director (MIS), Directorate General of Customs Valuation, Karachi, for uploading in One Customs & WEBOC database system.
- 7) The Chairman (Valuation Committee), FPCC&I, Federation House, Clifton, Karachi.
- 8) 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.