



Presentation GST – 9 & 9C on [FY 2023-24]

SPEAK

CA NILESH

MAHAJAN

Understanding THE applicability of GSTR – 9 & 9C

SR NO	TURNOVER CRITERIA	APPLICABILITY	
		Form GSTR – 9	Form GSTR – 9C
A	Registered taxpayers with aggregate turnover of less than ₹ 2 Crores	No	No
B	Registered taxpayers with aggregate turnover of more than ₹ 2 Crores but less than ₹ 5 Crores	Yes	No
C	Registered taxpayers with aggregate turnover of more than ₹ 5 Crores	Yes	Yes
D	Composition dealer	No [GSTR-9A] *	No
E	E-commerce operators collecting TCS under Section 52	No [GSTR-9B] *	No

Exemptions from filing of GSTR – 9 & 9C:

- Input Service Distributor
- TDS deductor under Section 51
- Casual taxable person
- Non-resident taxable person
- Central or State Government departments or local authorities audited by the Comptroller and Auditor-General of India or other legally appointed auditors



* Form GSTR – 9A has been removed from GSTN portal after introduction of GSTR - 4

* Form GSTR – 9B is yet to be notified by the Government

Consequences of not filing or wrong filing of GSTR – 9

Late fees for the delayed filing of the Annual Return [Form GSTR – 9] under Section 47(2) read with Notification No. 07/2023 – Central Tax, dated 31 March 2023

Aggregate Turnover in the FY 2022-23	Late Fee per Day (CGST)	Late Fee per Day (SGST/UTGST)	Maximum Late Fee (Based on turnover in state/UT)
Up to ₹ 5 Crore	₹ 25	₹ 25	0.02% of turnover each under CGST & SGST/UTGST
More than ₹ 5 crore up to ₹ 20 Crore	₹ 50	₹ 50	0.02% of turnover each under CGST & SGST/UTGST
Above ₹ 20 Crore	₹ 100	₹ 100	0.25% of turnover each under CGST & SGST/UTGST

- ❑ Under Section 46 read with Notification No. 38/2023 – Central tax, dated 04 August 2023, notice in **Form GSTR – 3A** shall be issued to person who fails to furnish the GSTR – 9
- ❑ Effective from October 1, 2023, as per the Finance Act, 2023, Section 44(2) now stipulates that the annual return cannot be filed after **three years from the due date**. Exceptions may be granted by the government on the Council's recommendation.
- ❑ In terms of Section 122(1)(x), wrong information with the **intention to evade payment of tax** due under this Act shall attract penalty of **ten thousand or an amount equivalent to the tax evaded**, whichever is higher
- ❑ In other cases, general penalty may be levied under Section 125. Maximum penalty can be levied under this Section is **₹ 25,000 CGST + ₹ 25,000 SGST**

Important FAQ

Q: If a taxpayer with multiple GSTINs under the same PAN has a turnover exceeding ₹2 Crore in one GSTIN, do they need to file annual returns for their other GSTINs with turnovers below ₹2 Crore?

A: Yes. While annual returns are filed GSTIN-wise, the aggregate turnover is calculated on a PAN basis.

Q: Whether is it required for holders of a cancelled GSTIN with a turnover over ₹2 Crore to file an Annual Return?

A: Those with a cancelled GSTIN and a turnover exceeding ₹2 Crore must file an Annual Return

Q: Can GSTR-9 and GSTR-9C be revised after filing?

A: No, revisions to GSTR-9 and GSTR-9C are not permitted post-filing

Q: What should be the base for preparing form GSTR – 9?

- ☐ Ideally, the financial statements, Form GSTR – 1, and Form GSTR – 3B should be synchronous. If the three are not in consensus, the financial statement should be used as the base, considering that financials are prepared after the end of the financial year, accounting for the necessary adjustments, provisions, and corrections
 - ☐ In exceptional cases, Form GSTR – 3B will have to be used as the base, as it is the return through which liability is discharged
-

Important FAQ

Q: Whether any additional liability can be declared which was not declared till the date of filing GSTR – 9?

- ☐ New liability, which was neither declared in returns nor paid, can be declared here.
 - ☐ Additional liability, which was paid through Form DRC - 03 but not declared in returns, can be declared here
-

Q: Whether additional liability declared in GSTR – 9 can be paid through credit?

A: Liabilities identified in the Annual Return should be paid using Form GST DRC-03 via the GST Cash Ledger only.

Q: Can any new input tax credit be availed or reversed?

A: No, neither new ITC can be availed, nor can reversal be done through Form GSTR – 9. However, reversal of ITC can be done through Form DRC – 03.

PRE-REQUISITES FOR PREPARING FORM GSTR – 9 & FORM GSTR – 9C

- ☐ **Consolidation** of monthly/quarterly data used for filing Form GSTR – 1 & Form GSTR – 3B
- ☐ Details of invoices/credit notes/debit notes pertains to FY 2022-23, declared in GSTR – 3B from April 23 to Oct 23
- ☐ **Reconciliation** of Form GSTR – 1 vs Form GSTR – 3B along with reasons for the difference
- ☐ **Financials** (P&L Account, Balance Sheet, Trial Balance, etc.) and in the case of **multi-state GSTINs**, extraction of state-wise trial balance whereby a total of all states should be tallied with turnover/input tax credit ('ITC') as per financials [**Verification and uploading with Form GSTR – 9C**].
- ☐ **Income** as per financials vs Form GSTR – 3B.
- ☐ Invoices, debit/credit notes declared in Form GSTR – 1 and/or Form GSTR – 3B from **Apr 2024 to Oct 2024** [Table 10 & 11 of Form GSTR – 9].
- ☐ Amendments to the invoices, debit notes, and credit notes with revenue implications that are declared in Form GSTR – 1 and/or Form GSTR – 3B for the period from **Apr 2024 to Oct 2024** [Table 10 & 11 of Form GSTR – 9].
- ☐ Invoices/debit notes on which GST liability is discharged through **Form DRC – 03 during FY 2022-23**.
- ☐ **Rate-wise outward supply summary**, including tax paid under **RCM** through Form GSTR – 3B [Table 9 of Form GSTR – 9C]
- ☐ Inward supply including credit & debit notes of FY 2022-23 declared in GSTR – 3B return from April 23 to Oct 23




OVERVIEW OF FORM GSTR - 9

Sections	Brief description
Part I	Basic details of registered person <ul style="list-style-type: none">- Includes FY, GSTIN, Legal Name, and Trade Name.
Part II	Details of outward supplies and inward supplies made during the financial year: <ul style="list-style-type: none">- Outward supplies (incl. RCM), credit/debit notes, amendments.- Missed outward supplies not reported in prior returns.
Part III	Details of ITC for Financial Year <ul style="list-style-type: none">- ITC claimed, reversed, and reclaimed as per GSTR-3B for FY 2023-24
Part IV	Details of taxes paid as declared in returns filed during the Financial Year <ul style="list-style-type: none">- Details of tax payable (from Part II) and paid via cash/credit.- Additional tax payable to be settled via DRC-03.
Part V	Details of the previous Financial Year's transactions reported in next Financial Year <ul style="list-style-type: none">- Transactions missed in the prior FY but reported in current FY returns.
Part VI	Other information: This part seeks additional information required to be reported in the Annual Return <ul style="list-style-type: none">- Includes demand, refund,- Inward supplies from composition taxpayers, deemed supplies (Sec. 143), goods on approval,- HSN summary, and- Late fees


CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

Pt.I	Basic Details		Requirement of the field
1	Financial Year	2023-24	Mandatory
2	GSTIN	27AAAAAO0N0N1ZV	
3	Legal Name	This can filed from GST registration certificate in REG-03. However, no space is provided to mention the same in offline tool	
4	Trade Name (if any)		


CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

Pt. II	Details of Outward and Inward supplies made during the financial year						
	(Amount in ₹ in all tables)						
	Nature of supplies	Taxable Value	Central Tax	State Tax/UT Tax	Integrated Tax	Cess	
	1	2	3	4	5	6	
4	Details of advances, inward and outward supplies made during the financial year on which tax is payable [GST paid via GSTR – 3B + DRC – 03 + Unpaid till Oct 2024]						Requirement of the field
			What to report?		What not to report?		
A	Supplies made to un-registered persons (B2C)	A. Supplies to unregistered person B. Supplies through ECO C. Supplies outside India but not export D. Net of credit/debit notes and amendments E. Any B2C supplies not declared till Oct’s 24 GSTR – 3B return		A. Export outside India B. Any B2C supplies including debit/credit /amendments of FY 2023-24 declared in GSTR – 3B return from April 24 to Oct 24		Mandatory [Refer table 5,7,9 & 10 of GSTR – 1]	


CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

		What to report?	What not to report?	Requirement
B	Supplies made to Registered persons (B2B)	<ul style="list-style-type: none"> A. Supplies to registered person including distinct person (Supply between two GSTIN having same PAN) B. Supplies to merchant exporter C. Supplies to UIN D. Supplies through ECO E. Any B2B supplies not declared till Oct's 24 GSTR – 3B return 	<ul style="list-style-type: none"> A. Zero-rated supply B. Deemed exports C. Debit/credit notes D. Amendments E. Supplies/debit notes/credit notes/amendments declared in return filed from April 24 to Oct 24 F. Outward covered under RCM 	<p>Mandatory</p> <p><i>[Refer table 4A & 4C of GSTR – 1]</i></p> 
C	Zero rated supply (Export) on payment of tax (except supplies to SEZs)	<ul style="list-style-type: none"> A. Export of goods and/or services made with payment of IGST 	<ul style="list-style-type: none"> A. Export without payment IGST B. Supplies to SEZ with or without payment of IGST C. Deemed export D. Credit/debit notes & amendments E. Supplies/debit/credit notes /amendments declared in return filed from April 24 to Oct 24 	<p>Mandatory</p> <p><i>[Refer table 6A of GSTR – 1]</i></p>


CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

		What to report?	What not to report?	Requirement
D	Supply to SEZs on payment of tax	Supplies made to SEZ on payment of IGST	A. Supplies to SEZ without payment of IGST B. Deemed export C. Credit/debit notes & amendments D. Supplies/debit notes/credit notes/amendments declared in return filed from April 24 to Oct 24	Mandatory <i>[Refer table 6B of GSTR – 1]</i> 
E	Deemed Exports	A. Supplies to EOU B. Supplies against advance authorisation scheme, EPCG license C. Supplies of gold by Bank/PSU D. Any deemed export supplies not declared till Oct's 24 GSTR – 3B return	A. Credit/debit notes & amendments B. Supplies/debit notes/credit notes/amendments declared in return filed from April 24 to Oct 24	Mandatory <i>[Refer table 6C of GSTR – 1]</i>

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

		What to report?	What not to report?	Requirement
F	Advances on which tax has been paid but invoice has not been issued (not covered under (A) to (E) above)	<ul style="list-style-type: none"> A. Outstanding advances against which invoices not issued in FY 2023-24 B. Outstanding advances only for services C. Any outstanding advances not declared till Oct's 24 GSTR – 3B return 	<ul style="list-style-type: none"> A. Credit/debit notes & amendments B. Any advances declared in return filed from April 24 to Oct 24 	Mandatory <i>[Refer table 11A+11B working of GSTR – 1 + separate working required]</i>
G	Inward supplies on which tax is to be paid on reverse charge basis	<ul style="list-style-type: none"> A. Supplies on which GST has been paid under RCM B. Levy under Section 9(3) & 9(4) of CGST Act and 5(3) & 5(4) of IGST Act C. Currently 9(4) & 5(4) is applicable to real estate sector 	<ul style="list-style-type: none"> A. Outward supply which is covered under RCM on which recipient is liable to pay GST B. Taxes paid on import of goods C. RCM Liability declared & paid in return filed from April 24 to Oct 24 	Mandatory <i>[Refer table 3.1(d) of GSTR – 3B]</i>

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

		What to report?	What not to report?	Requirement
G1	Supplies on which e-commerce operator is required to pay tax as per Section 9(5) <i>[Passenger transport services, housekeeping services, accommodation services etc.]</i>	A. ECO to report supplies made through the said Eco net of amendments, if any B. Any supplies not declared till Oct's 24 GSTR – 3B return	Any supplies declared & paid in return filed from April 24 to Oct 24 	Mandatory <i>[Refer table 15 and 15A of GSTR – 1]</i>
H	Sub-total (A to G1 above)			


CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

		What to report?	What not to report?	Requirement
I	Credit Notes issued in respect of transactions specified in (B) to (E) above (-)	Credit notes issued against <ul style="list-style-type: none"> A. B2B Supplies B. Zero-rated supplies with payment of IGST C. Deemed supplies D. Credit note declared in GSTR – 1 but could not adjust due to no or less outward supply in GSTR – 3B return 	<ul style="list-style-type: none"> A. B2C credit notes B. Commercial credit notes C. Credit notes issued against invoices of FY 23-24 and declared in GSTR – 3B return of April 24 to Oct 24 	Mandatory <i>[Refer table 9B of GSTR – 1]</i>
J	Debit Notes issued in respect of transactions specified in (B) to (E) above (+)	Debit notes issued against <ul style="list-style-type: none"> A. B2B Supplies B. Zero-rated supplies with payment of IGST C. Deemed supplies D. Any Debit note not declared till Oct's 24 GSTR – 3B return 	<ul style="list-style-type: none"> A. B2C debit notes B. Commercial debit notes C. Debit notes issued against invoices of FY 23-24 and declared in GSTR – 3B return of April 24 to Oct 24 	Mandatory <i>[Refer table 9B of GSTR – 1]</i>

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

		What to report?	What not to report?	Requirement
K	Supplies/tax declared through Amendments (+)	Amendments to A. B2B B. Zero-rated supplies C. Deemed supplies D. Debit/Credit notes Only differential value to be reported	Amendments to A. B2C supplies	Mandatory [Refer table 9A & 9C of GSTR – 1]
L	Supplies/tax reduced through Amendments (-)			
M	Sub-total (I to L)	Auto – populated		
N	Supplies and Advances on which tax is to be paid (H+M) above	Auto – populated		

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

Pt. II	Details of Outward and Inward supplies made during the financial year						
	(Amount in ₹ in all tables)						
	Nature of supplies	Taxable Value	Central Tax	State Tax/UT Tax	Integrated Tax	Cess	
	1	2	3	4	5	6	
5	Details of Outward supplies made during the financial year on which tax is not payable						Requirement of the field
			What to report?	What not to report?			
A	Zero-rated supply (Export) without payment of tax	Export without payment of IGST under Bond/LUT (Net of Debit/Credit notes and Amendments)		A. Supplies to SEZ without payment of IGST B. Export with payment of IGST		Mandatory [Refer table 6A & 6B of GSTR – 1]	
B	Supply to SEZs without payment of tax	Supplies to SEZ under LUT without payment of IGST		Supplies to SEZ with payment of IGST			
C	Supplies on which tax is to be paid by the recipient on reverse charge basis	Outward supplies on which recipient is liable to pay tax and not the supplier		Inward supplies covered under RCM where recipient is liable to pay GST		Mandatory [Refer table 4B of GSTR – 1]	


CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

		What to report?	What not to report?	Requirement
C1	Supplies on which tax is to be paid by E-commerce operators as per section 9(5) [Supplier to report]	<ul style="list-style-type: none"> Supplies through ECO on which ECO is liable to pay tax under Section 9(5) Any supplies not declared till Oct's 24 GSTR – 3B 	Supplies through ECO which are not covered under Section 9(5)	Mandatory <i>[Refer table 14(b) and 14A(b) of GSTR – 1]</i>
D	Exempted	Taxable supplies fully exempted via specific exemption notification	Merchant export	
E	Nil Rated	Nil/zero rate is provides in rate notification Can be clubbed in 5D above		Optional
F	Non-GST Supply (includes 'no supply')	<ul style="list-style-type: none"> Supplies which are outside the preview of GST such as petrol, diesel, petroleum crude, natural gas, ATF & Alcohol etc No-supply which are covered in Schedule-III Any other items of revenue in books which cannot be regarded as supply 		Mandatory
G	Sub-total (A to F above)	<i>Auto – populated</i>		


CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

		What to report?	What not to report?	Requirement
H	Credit Notes issued in respect of transactions specified in A to F above (-)	Credit notes, Debit notes and amendments against supplies declared in table 5A to 5F can be declared here. However, option has been provided to taxpayer can declared the net of impact of these while reporting the same in Table 5A to 5F		Optional [Refer table 9A & 9B of GSTR – 1]
I	Debit Notes issued in respect of transactions specified in A to F above (+)			
J	Supplies declared through Amendments (+)			
K	Supplies reduced through Amendments (-)			
L	Sub-total (H to K above)	<i>Auto – populated</i>		
M	Turnover on which tax is not to be paid (G + L above)	<i>Auto – populated</i>		
N	Total Turnover (Including advances) (4N+5M-4G-4G1)	<i>Auto – populated</i>		

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

Pt.III	Details of ITC for the financial year						
	(Amount in ₹ in all tables)						
	Description	Type	Central Tax	State Tax/	Integrated Tax	Cess	
	1	2	3	4	5	6	
6	Details of ITC availed during the financial year						Requirement
A	Total amount of input tax credit availed through FORM GSTR – 3B (Sum total of Table 4A of Form GSTR – 3B)		Auto – populated from Form GSTR – 3B				Refer table 4A of GSTR – 3B
B	Inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs)	Inputs	What to report: 1. ITC availed in GSTR–3B [Apr 23 - Mar 24] 2. ITC on capital goods should be reported separately, however, ITC on inputs and inputs services can be clubbed & reported into ‘inputs’ only 3. If ITC in GSTR – 3B returns of FY 23-24 is reported in line with Circular 170 then report ITC on gross basis & any reversal in table 7 otherwise report net basis				Mandatory Refer table 4(A)(5) of Form GSTR – 3B
		Capital Goods					
		Input Services					

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

B	Inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs)	Inputs	What not to report: <ol style="list-style-type: none"> 1. ITC on liability paid under RCM 2. ITC on import of goods and/or services 3. ISD ITC 4. ITC reclaimed in terms of Rule 37 & 37A 5. ITC availed, reversed and reclaimed in GSTR – 3B return from April 23 to Mar 24 6. ITC of FY 2023-24 claimed in GSTR – 3B returns filed from April 24 to Oct 24 	Mandatory <i>Refer table 4(A)(5) of Form GSTR – 3B</i> 
		Capital Goods		
		Input Services		
C	Inward supplies received from unregistered persons liable to reverse charge (Other than B above) on which tax is paid & ITC availed	Inputs	What to report: <ol style="list-style-type: none"> 1. RCM liability paid and ITC availed in GSTR – 3B return from April 23 to Mar 24 2. ITC on capital goods should be reported separately, however, ITC on inputs and inputs services can be clubbed & reported into ‘inputs’ only What not to report: <ol style="list-style-type: none"> 1. RCM liability paid in April 23 to Mar 24 but ITC availed in April 24 to Oct 24 2. RCM liability paid on import of services 	Mandatory <i>Refer Table 4(A)(3) of GSTR – 3B</i>
		Capital Goods		
		Input Services		


CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

D	Inward supplies received from registered persons liable to reverse charge (other than B above) on which tax is paid and ITC availed	Inputs	What to report: ITC on inward supplies notified under RCM and supplied by the registered person	Mandatory [Refer table 4A(3) of GSTR – 3B Return]
		Capital goods		
		Input services		
E	Import of goods (Including supplies from SEZs)	Inputs	What to report: 1. IGST paid on import of goods 2. IGST paid on procurement from SEZs What not to report: ITC availed on imports or SEZ supplies in GSTR – 3B return from April 24 to Oct 24	Mandatory [Refer table 4(A)(1) of GSTR – 3B Return]
		Capital goods		
F	Import of services (Inward supplies from SEZs)		ITC on RCM liability paid on import of services	Mandatory [Refer table 4(A)(2) of GSTR – 3B Return]
G	Input Tax credit received from ISD			Mandatory

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

H	Amount of ITC reclaimed (other than B above) under the provisions of Act	What to report: 1. ITC reclaimed which was originally availed in 6B and reversed in Table 7 in same FY 2. This may lead to difference in Table 8A reconciliation as only figures in Table 6 are considered in table 8A and no effect of table 7 is considered. 3. To avoid it can be reported in table 6M 4. Advisory issued on 9 Dec, suggest to report net figure in 6B	Mandatory
I	Sub-Total (B to H above)	<i>Auto-populated</i>	
J	Difference (I – A above)	<i>Auto-populated</i>	
K	Transition Credit through TRAN – I (Including revisions if any)		
L	Transition Credit through TRAN – II		
M	Any other ITC availed but not specified above	ITC of previous FY 2022-23, ITC-02, ITC-02 etc	
N	Sub-total (K to M above)	<i>Auto-populated</i>	
O	Total ITC availed (I+N above)	<i>Auto-populated</i>	

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

Pt. II	Details of Outward and Inward supplies made during the financial year						
	(Amount in ₹ in all tables)						
	Nature of supplies	Taxable Value	Central Tax	State Tax	Integrated Tax	Cess	
	1	2	3	4	5	6	
7	Details of ITC Reversed and Ineligible ITC for the financial year						Requirement of the field
A	As per Rule 37		180 days payment				Optional Can be clubbed & declared in 7H except table 7F & 7G
B	As per Rule 39		ISD credit adjustment				
C	As per Rule 42		Common ITC on I & IS				
D	As per Rule 43		Common ITC on CG				
E	As per Section 17(5)		Ineligible ITC				
F	Reversal of TRAN – I Credit						
G	Reversal of TRAN – II Credit						
H	Other reversal (pl. specify)						
I	Total ITC Reversed (Sum of A to H)		Auto-populated				
J	Net ITC Available for Utilization (6O – 7I)		Auto-populated				

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

8	Other ITC related information		Requirement
A	ITC as per GSTR-2B (Table 3 & 5 thereof)	Discussed in detailed in next slides	
B	ITC as per sum total of 6(B) and 6(H) above		
C	ITC on inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs) received during the financial year but availed in the next financial year up to specified period		
D	Difference [A-(B+C)]		
E	ITC available but not availed		
F	ITC available but ineligible		
G	IGST paid on import of goods (including supplies from SEZ)		
H	IGST credit availed on import of goods (as per 6(E) above)		
I	Difference (G-H)		
J	ITC available but not availed on import of goods (Equal to I)		
K	Total ITC to be lapsed in current FY (E+F+J)		

ISSUE IN TABLE 8 REPORTING

8	Other ITC related information	FY 2022-23 (₹)	FY 2023-24 (₹)	Total ITC (₹)
A	ITC as per GSTR-2B (Table 3 & 5 thereof)	-	1,50,000	1,50,000
B	ITC as per sum total of 6(B) and 6(H) above	10,000	1,00,000	1,10,000
C	ITC on inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs) received during the financial year but availed in the next financial year up to specified period	-	50,000	50,000
D	Difference [A-(B+C)]	-	-	-10,000

Option A	<div><input type="checkbox"/> Report F.Y. 2022-23 ITC in F.Y. 2023-24's GSTR-9 Table 6M.</div> <div><input type="checkbox"/> Only include F.Y. 2023-24 ITC in Table 6B, which auto-fills in Table 8B for comparison with 8A, avoiding Table 8D discrepancies.</div> <div><input type="checkbox"/> Be aware of potential negative values in Table 6J</div>
Option B	Adjust the figure to be reported in 8C. (₹ 50,000 - ₹ 10000 = ₹ 40,000)
Option C	Keep as it is as per Advisory

PRACTICAL ISSUES

Reporting of ITC in GSTR-9 Considering Ineligible/permeant ITC Reversed in GSTR-3B

Context: Under the current GST reporting requirements, Input Tax Credit (ITC) as per Table 4(A)(5) of GSTR-3B includes Ineligible ITC (under Section 17(2)/17(5)) but is reversed in Table 4(B)(1) of the same form.

Issue with Auto-Population in GSTR-9: When this Ineligible ITC amount is reported in Table 6B of GSTR-9, it gets auto-populated in Table 8B. Since Table 8A of GSTR-9 also includes these ineligible credits, there's no discrepancy noted in Table 8D of GSTR-9. This situation leads to confusion for taxpayers regarding the reporting in:

- ☐ **Table 8E: ITC available but not availed (based on the amount in Table 8D), and**
- ☐ **Table 8F: ITC availed but ineligible (also from the amount in Table 8D).**



PROBABLE SOLUTIONS

8	Other ITC related information	Eligible ITC	Ineligible ITC	Total ITC (₹)
A	ITC as per GSTR-2B (Table 3 & 5 thereof)	2,00,000	1,50,000	3,50,000
B	ITC as per sum total of 6(B) and 6(H) above	2,00,000	1,50,000	3,50,000
C	ITC on inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs) received during the financial year but availed in the next financial year up to specified period	-	-	-
D	Difference [A-(B+C)]	-	-	-
E	ITC available but not availed			-
F	ITC available but ineligible			??????



Table 6B Reporting	Only include the ITC claimed and not reversed in Table 4(B)(1) of GSTR-3B. Essentially, this should be the Eligible ITC.
Table 6M Inclusion	Report the Ineligible ITC claimed but reversed in Table 4(B)(1) of GSTR-3B

PRACTICAL ISSUES

Accurate Reporting of ITC in GSTR-9 Considering Double Counting Issues after changes in ITC reporting in Form GSTR – 3B w.e.f August 2022 in terms of Notification No. 14/2022 – Central Tax dated 05 July 2022 read with Circular No. 170/02/2022-GST dated 6 July 2022

Overview: Taxpayers are required to bifurcate Gross ITC availed in GSTR-3B into various sections (Table 6B to 6O) in GSTR-9. Specifically, B2B ITC claimed in GSTR-3B should be reported in Table 6B of GSTR-9, which is then auto-populated in Table 8B for comparison with ITC as per GSTR-2B (Table 8A).

Issue 1: Double Reporting of ITC:

Scenario: Taxpayers report gross ITC as per GSTR-2B in Table 4(A)(5) and a temporary reversal in Table 4(B)(2) in one tax period. In the subsequent tax period, the reversed ITC is reclaimed and reported again in Table 4(A)(5).

Problem: This process leads to the same invoice/ITC being reported twice in Table 4(A)(5) of GSTR-3B, creating a potential issue in GSTR-9 reporting. Reporting it twice in Table 6B of GSTR-9 could lead to negative figures in Table 8D, causing confusion and possibly incorrect tax calculations.

GSTin
SHORT

PRACTICAL ISSUES

Treatment non-payment of consideration to the supplier within 180 days:

Particulars	April (₹)	Sept (₹)	Dec (₹)
ITC availed/re-vailed in GSTR – 3B	18,000	-	18,000
ITC reversed due to non-payment to supplier	-	18,000	-



Details	Month wise reporting		
A. ITC Available (whether in full or part)	April	Oct	Dec
(1) Import of goods			
(2) Import of services			
(3) Inward supplies liable to reverse charge (other than 1 & 2 above)			
(4) Inward supplies from ISD			
(5) All other ITC	₹18,000	-	₹18,000
B. ITC Reversed			
(1) As per rules 38,42 & 43 of CGST Rules and section 17(5)			
(2) Others	-	₹18,000	-
C. Net ITC available (A-B)			
(D) Other Details			
(1) ITC reclaimed which was reversed under Table 4(B)(2) in earlier taxperiod	-	-	₹18,000
(2) Ineligible ITC under section 16(4) & ITC restricted due to PoS rules			

PROBABLE SOLUTIONS

6	Details of ITC availed during the financial year	
A	Total amount of input tax credit availed through FORM GSTR-3B (Sum total of Table 4A of FORM GSTR-3B)	₹ 18,000
H	Amount of ITC reclaimed (other than B above) under the provisions of the Act	-
M	Any other ITC availed but not specified above	₹ 18,000

7	Details of ITC Reversed and Ineligible ITC for the financial year	
H	Other reversals (pl. specify)	-

8	Other ITC related information	
A	ITC as per GSTR-2A (Table 3 & 5 thereof)	₹ 18,000
B	ITC as per sum total of 6(B) and 6(H) above	₹ 18,000
C	ITC on inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs) received during the financial year but availed in the next financial year up to specified period	-
D	Difference [A-(B+C)]	-

ADVISORY ISSUED BY GST PORTAL

Sr. No.	Issue	Reporting in GSTR 9
1	Invoice having the date of FY 23-24 but the supplier has reported in the GSTR 1 after the due date of March'24. As a result, this amount is not auto populated in the Table 8A of GSTR 9 for FY 2023-24 because it is the part of next years GSTR 2B. How to report such transaction in the GSTR 9 of FY 23-24?	Taxpayer shall report such ITC in the Table 8C and in Table 13 as this is the ITC of FY 2023-24. This is in line with the instructions to the Table 8C and Table 13 of GSTR 9
2	Invoice belongs to FY 23-24 and ITC has been claimed in FY 23-24. Due to payment not made to supplier within 180 days, ITC was reversed in 23-24 as per the second proviso to section 16(2) and this ITC is reclaimed in next Year FY 2024-25, after making the payment to supplier. How to report such transaction in the GSTR 9 of FY 23-24?	This reclaimed ITC shall be reported in the table 6H of GSTR 9 for FY 24-25 hence not in the Table 8C and Table 13 of GSTR 9 of FY 2023-24. This is in line with the Instruction to the Table 13 given in the Notified Form GSTR 9. Similar reporting is applicable for the ITC reclaimed as per Rule 37A

ADVISORY ISSUED BY GST PORTAL

3	Invoice belongs to FY 2023-24 but goods not received in 23-24 therefore ITC is claimed in Table 4A5 of GSTR 3B and reversed in Table 4B2 as per the guidelines of Circular 170 and such ITC reclaimed in next FY 2024-25 till the specified time period. How to report such transaction in the GSTR 9 of FY 23-24?	Taxpayer shall report such reclaimed ITC in the Table 8C and Table 13 as this is the ITC of FY 2023-24.
4	Invoice belongs to FY 22-23 which is appearing in the Table 8A of GSTR 9 of FY 23-24 , as the supplier would have reported the same in GSTR 1 after the due date of filing of GSTR-1 for the tax period of March 23. How to report such transaction in the GSTR 9 of FY 23-24?	This is the ITC of last year (2022-23) and was auto populated in table 8A of GSTR-9 of FY 22-23. Hence, aforesaid value need not to be reported in the table 8C and Table 13 of GSTR-9 for FY 23-24. This is in line with the instruction no 2A given for the notified form GSTR 9 which states that Table 4,5,6 and Table 7 should have the details of current FY only

ADVISORY ISSUED BY GST PORTAL

5	Where to report the reclaim of ITC for an Invoice which belongs to FY 2023-24, and which is claimed, reversed and reclaimed in the same year?	<p>As already clarified by the CBIC press release 3rd July 2019 in the para k, It may be noted that the label in Table 6H clearly states that information declared in Table 6H is exclusive of Table 6B. Therefore, information of such input tax credit is to be declared in one of the rows only.</p> <p>Further, as the claim and reclaim is reported only in one row therefore the same should not be reported in the reversal under table 7 of GSTR 9 of FY 23-24.</p>
---	---	---

CLAUSE BY CLAUSE ANALYSIS OF GSTR - 9

Pt. IV	Details of tax paid as declared in returns filed during the financial year							Reporting
9	Description	Tax Payable	Paid through Cash	Paid through ITC				
				CGST	SGST /UTGST	IGST	Cess	
	1	2	3	4	5	6	7	
	Integrated Tax	. This is editable & same must be in alignment with taxable turnover in Table 4N of GSTR-9.	It is the actual tax paid during the financial year. Payment of tax under Table 6.1 of FORM GSTR-3B may be used for filling up these details #					Mandatory
	Central Tax							
	State/UT Tax							
	Cess							
	Interest							
	Late Fee							
	Penalty							
	Other							

Taxpayers need to keep track of scenarios where the Input Tax Credit (ITC) reversed during any tax period is more than the Net ITC available during that tax period. In such cases, the reversible amount which is more than Net ITC is automatically added to the output tax liability of that tax period. These cases lead to a difference in ‘Tax Paid’ and ‘Tax Payable’ of Table 9 of GSTR 9.

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

Pt. V	Particulars of the transactions for the financial year declared in returns of the next financial year till the specified period For FY 2023-24, Part V consists of particulars of transactions for the previous financial year but paid in the FORM GSTR-3B of April 2024 to October 2024 filed upto 30th November 2024						
	Description	Taxable Value	CGST	SGST /UTGST	IGST	Cess	
	1	2	3	4	5	6	
10	Supplies / tax declared through Amendments (+) (net of debit notes)						Mandatory
11	Supplies / tax reduced through Amendments (-) (net of credit notes)						Mandatory
12	Reversal of ITC availed during previous financial year						Optional
13	ITC availed for the previous financial year						Optional


CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

14	Differential tax paid on account of declaration in 10 & 11 above		
	Description	Payable	Paid
	1	2	3
	IGST		
	CGST		
	SGST/UTGST		
	Cess		
	Interest		


REPORTING OF OUTWARD SUPPLY Table 4 OF PART II AND Table 10 &

SN	Details of outward supplies	Where to declare in GSTR 9
A	Supply and tax of FY 2023-24 both are declared and paid in GSTR 3B of April 2023 to March 2024	Table 4, Pt II
B	Supply and tax both of FY 2023-24 declared and paid in GSTR 3B of April 2024 to October 2024 (GSTR 3B of October 2024 filed up to 30th November 2023)	Tables 10 & 11, Pt V
C	Supply and tax of FY 2023-24 not declared and paid in GSTR 3B (of any tax period of April 2023-October 2024) on or before 30th November 2023 or before filing the annual return (whichever is earlier)	Table 4, Pt II

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

Pt. VI	Other Information								Reporting
15	Particulars of Demands and Refunds								
	Details	CGST	SGST /UTG ST	IGST	Cess	Intere st	Penalt y	Lat Fee /Others	
	1	2	3	4	5	6	7		
A	Total Refund claimed	<div></div>							Optional
B	Total Refund sanctioned								
C	Total Refund Rejected								
D	Total Refund Pending								
E	Total demand of taxes	-							Optional
F	Total taxes paid in respect of E above								
G	Total demands pending out of E above								

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR - 9

16	Information on supplies received from composition taxpayers, deemed supply under section 143 and goods sent on approval basis									
	Description			Taxable Value	CGST	SGST /UTGST	IGST	Cess		
	1			2	3	4	5	6		
A	Supplies received from Composition taxpayers			Table 5 of FORM GSTR-3B						Optional
B	Deemed supply under Section 143			Deemed supplies from the principal to the job-worker in terms of 143(3) & 143(4) of the CGST Act shall be declared here.					Optional	
C	Goods sent on approval basis but not returned			Goods not returned to the principal supplier within one eighty days of such supply shall be declared here.					Optional	
17	HSN Wise Summary of outward supplies									
HSN	UQC	Total Quantity	Taxable Value	Rate of Tax	CGST	SGST/UT	IGST	Cess		
1	2	3	4	5	6	7	8	9	Mandatory	
18	HSN Wise Summary of Inward supplies									
HSN	UQC	Total Quantity	Taxable Value	Rate of Tax	CGST	SGST/UT	IGST	Cess		
1	2	3	4	5	6	7	8	9	Optional	
19	Late fee payable and paid									
	Description				Payable		Paid			
	1				2		3			
A	Central Tax				Late fee will be payable if annual return is filed after the due date.					
B	State Tax									-

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR – 9C

Pt. II. Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return

5	Reconciliation of Gross Turnover	
S.No	Description	Amount (₹)
A	Turnover (including exports) as per Audited Financial Statement for the State / UT (For multi-GSTIN units under same PAN, the turnover shall as be derived from the Audited Annual Financial Statements) *	
B	Unbilled revenue at the beginning of the Financial Year	Add
C	Unadjusted advances at the end of the Financial Year	Add
D	Deemed Supply under Schedule I	Add
E	Credit Notes issued after the end of the financial year but reflected in the annual return	Less
F	Trade Discounts accounted for in the audited Annual Financial Statement but are not permissible under GST	Add
G	Turnover from April 2017 to June 2017	NA
H	Unbilled revenue as at the end of the Financial Year	Less
I	Unadjusted Advances as at the beginning of the Financial Year	Not relevant
J	Credit notes accounted for in the audited Annual Financial Statement but are not permissible under GST	Add
K	Adjustments on account of supply of goods by SEZ units to DTA Units	Less
L	Turnover for the period under composition scheme	Less
M	Adjustments in turnover under section 15 and rules thereunder	Add/Less
N	Adjustments in Turnover due to foreign exchange fluctuation	Add/Less
O	Adjustment in Turnover due to reasons not listed above	Add/less
P	Annual Turnover after adjustments as above(A+B+C+D-E+F-G-H-I+J-K-L+M+N+O) *	
Q	Turnover as declared in Annual return (GSTR9)*	5N + 10 - 11
R	Un-Reconciled turnover (Q- P) *	


CLAUSE-BY-CLAUSE ANALYSIS OF GSTR – 9C

Pt. II. Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9)		
7	Reconciliation of Taxable Turnover	
S.No	Description	Amount (₹)
A	Annual Turnover after adjustments [from 5(P) above]	<Auto-populated>
B	Value of Exempted, Nil Rated, Non-GST Turnover, No supply turnover	
C	Zero rated supplies without payment of tax	
D	Supplies on which tax is to be paid by the recipient on reverse charge basis	
E	Taxable turnover as per adjustments above (A-B-C-D)*	<Auto-populated>
F	Taxable turnover as per liability declared in Annual Return (GSTR9)*	4N – 4G + (10-11)
G	Unreconciled Taxable Turnover (F-E)*	

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR – 9C

Pt. III. Reconciliation of tax paid						
9	Reconciliation of rate wise liability and amount payable thereon					
S.No	Description	Taxable Value (₹)	Tax payable (₹)			
			Central Tax	State Tax/UT Tax	Integrated Tax	Cess, if applicable
A	5%		Rate-wise as paid in GSTR – 3B return from April 23 to March 24			
B	5% (RC)					
C	12%					
D	12% (RC)					
E	18%					
F	18% (RC)					
G	28%					
H	28% (RC)					
I	3%					
J	0.25%					
K	0.10%					
L	Interest					
M	Late Fee					
N	Penalty					
O	Others					
P	Total amount to be paid as per tables above (A to O)*		0.00	0.00	0.00	0.00
Q	Total amount paid as declared in Annual Return					
R	Un-reconciled payment (Q-P)*		0.00	0.00	0.00	0.00

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR – 9C

Pt. III. Reconciliation of tax paid						
11	Additional amount payable but not paid (due to reasons specified under Tables 6,8 and 10 above)					
SR No	Description	Taxable Value (₹)	To be paid through Cash (₹)			
			Central Tax	State Tax/UT Tax	Integrated Tax	Cess, if applicable
A	5%		<div><p>For declaration purpose only</p></div>			
B	12%					
C	18%					
D	28%					
E	3%					
F	0.25%					
G	0.10%					
H	Interest					
I	Late Fee					
J	Penalty					
K	Others					

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR – 9C

Pt. IV. Reconciliation of Input Tax Credit (ITC)		
12	Reconciliation of Net Input Tax Credit (ITC)	
S.No	Description	Amount (₹)
A	ITC availed as per audited Annual Financial Statement for the State/ UT (For multi-GSTIN units under same PAN, this should be derived from books of accounts)*	ITC booked in FY 2023-24
B	ITC booked in earlier Financial Years claimed in current Financial Year	Booked in FY 22-23 & Availed in FY 23-24
C	ITC booked in current Financial Year to be claimed in subsequent Financial Years	Booked in FY 23-24 & Availed in FY 24-25
D	ITC availed as per audited financial statements or books of accounts (A + B - C)*	0.00
E	ITC claimed in Annual Return (GSTR9)*	7J of GSTR 9C
F	Un-reconciled ITC (E-D)*	0.00

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR – 9C

Pt. IV. Reconciliation of Input Tax Credit (ITC)				
14	Reconciliation of ITC declared in Annual Return (GSTR9) with ITC availed on expenses as per audited Annual Financial Statement or books of account			
S.No	Description	Value (₹)	Amount of Total ITC (₹)	Amount of eligible ITC availed (₹)
A	Purchases	<div>Optional</div> <div>GSTinSHORT</div>		
B	Freight / Carriage			
C	Power and Fuel Costs			
D	Imported goods (Including received from SEZ)			
E	Rent and Insurance Expense			
F	Goods lost, stolen, destroyed, written off or disposed of by way of gift or free samples			
G	Royalties			
H	Employee's Cost (Salaries, Wages, Bonus etc .)			
I	Conveyance charges			
J	Bank Charges			
K	Entertainment charges			
L	Stationery Expenses (including postage etc.)			
M	Repair and Maintenance			
N	Other Miscellaneous expenses			
O	Capital goods			
P	Any other expense 1			
Q	Any other expense 2			
R	Total amount of eligible ITC availed (A to Q)*			
S	ITC claimed in Annual Return (GSTR9)			
T	Un-reconciled ITC (S-R)*			

CLAUSE-BY-CLAUSE ANALYSIS OF GSTR – 9C

Pt. IV. Reconciliation of Input Tax Credit (ITC)

16	Tax payable on un-reconciled difference in ITC (due to reasons specified in 13 & 15 above)	
S.No	Description	Amount payable (₹)
A	Central Tax	
B	State tax /UT tax	
C	Integrated Tax	
D	Cess	
E	Interest	
F	Penalty	



CLAUSE-BY-CLAUSE ANALYSIS OF GSTR – 9C

Pt. V. Auditor's recommendation on additional Liability due to non-reconciliation

S.No	Description	Value (₹)	To be paid through Cash (₹)			
			Central Tax	State Tax / Union territory Tax	Integrated Tax	Cess
A	5%					
B	12%					
C	18%					
D	28%					
E	3%					
F	0.25%					
G	0.10%					
H	Input tax credit					
I	Interest					
J	Late Fee					
K	Penalty					
L	Any other amount paid for supplies not included in annual return (GSTR9)					
M	Erroneous refund to be paid back)					
N	Outstanding demands to be settled					
O	Other					

CHECK-POINTS FOR EXCEPTIONAL TRANSACTIONS

☐ **FREE / SAMPLE SUPPLY OF GOODS & SERVICES**

Treatment of ITC availed on goods and services used in making such supplies – ITC reversal

☐ **FREE SUPPLY OF GOODS & SERVICES UNDER WARRANTY**

Treatment of ITC availed on goods and services used in making such supplies – No ITC reversal [Circular 195]

☐ **REIMBURSEMENT OF EXPENSES**

Treatment of reimbursement of expenses – GST payable/Pure agent



☐ **RECOVERY ON ACCOUNT OF DELAYED PAYMENT OF CONSIDERATION**

Treatment of recovery in form of interest, penalty or any other form against delayed payment of consideration

☐ **NON-RECEIPT OF MATERIAL / CAPITAL GOODS SENT TO JOB WORKER**

Treatment of material not received from job worker within one year and for capital goods within three years

☐ **PENDING CONFIRMATION OF SUPPLY BEYOND SIX MONTHS IN CASE OF SALE ON AN APPROVAL BASIS**

Treatment in the case where neither material nor confirmation is received from the recipient within six months

☐ **DELAYED PAYMENT TO VENDORS BEYOND 180 DAYS**

Treatment of ITC availed on inward supply where payment is delayed beyond 180 days

☐ **SALE OF LAND OR BUILDING AFTER COMPLETION**

Treatment for reversal of ITC

CHECK-POINTS FOR EXCEPTIONAL TRANSACTIONS

☐ **SALE OF SECURITIES**

Treatment for reversal of ITC under Rule 42

☐ **ADJUSTMENT OF INCOME AGAINST EXPENSES**

Treatment of income which is adjusted against expenses incurred for such incomes

☐ **BOOK ADJUSTMENT FOR GOODS LOST, STOLEN & DESTROYED**

Treatment of ITC availed on such goods

☐ **CAPITAL GOODS SOLD – MOTOR VEHICLE / OTHERS**

Treatment of ITC availed on such capital goods or special procedure in case of sale of motor vehicles

☐ **RECEIPT OF THE AMOUNT FOR AGREEING TO ANY SORT OF OBLIGATION TO REFRAIN FROM ANY ACT, OR TO TOLERATE ANY ACT OR A SITUATION, OR FOR DOING ANY ACT**

Treatment as per Circular No. 178/10/2022 - GST

☐ **STATUS OF COMPLIANCE FOR SUPPLY OF GOODS TO MERCHANT EXPORTER AT CONCESSIONAL RATE**

[Notification No. 40/2017 – Central Tax (Rate), dated 23 Oct 2017]

☐ **RECOVERY FROM EMPLOYEES**

Uniform / Canteen / Transportation etc



CHECK-POINTS FOR EXCEPTIONAL TRANSACTIONS

☐ **DELAYED REPORTING OF INVOICES [VERIFICATION CHECK – DATE OF INVOICE]**

Delayed reporting of invoices in the subsequent month will attract interest liability on gross liability

☐ **CATEGORISATION OF CREDIT NOTE & EFFECT OF THE SAME**

Credit notes need to be categorized into GST credit notes and commercial credit notes & GST credit notes need to be reported correctly in Form GSTR – 1 and adjusted against outward tax liability in Form GSTR – 3B within the specified time limits

☐ **EFFECT OF CREDIT / DEBIT NOTE RECEIVED FROM VENDOR**

Effect of credit/debit notes issued by vendors or adjustment in books of account



☐ **REASON OF REVERSAL & RE-CREDIT OF ITC**

Any reversal of ITC should be checked for interest liability, and any re-credit of ITC due to the rejection of a refund claim should be ensured to be credited in the ledger through PMT-03.

☐ **RCM LIABILITY**

- Verification of inward supply of specified services or goods for the applicability of RCM provisions is essential.
- While discharging liability under RCM, determining the place of supply is often neglected.
- It is advisable to assess the time of supply on a sample basis.
- Consider the eligibility and availment of credit.
- Compare foreign payment expense heads in the books versus RCM paid on the import of services.
- Reconcile RCM tax paid in GSTR 3B with RCM reported by the supplier in GSTR 2B.