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EDITORIAL

Friends,

Provisions related to Trusts/NPOs/Charitable Institutions are the subject matter of constant changes over the past 3 years. The CBDT is bent on streamlining the Income Tax issues relating to trusts which are long pending; The Apex Court has also in a series of judgements held against the trusts. Trusts thus needed some relaxations and the CBDT has provided a little vide Circular No. 6 of 2023, dated 24- 05-2023, which announced a series of aspects which trusts should take note of.

It has extended the due date to file an application in Form No. 10A or Form No. 10AB till 30.09.2023, where the due date for making such application has expired prior to such date. Hence incase trusts have still not availed their RCs, they should avail of the same. However, in case they do not wish to renew their registration, then as per the amended Section 115TD, the accreted income of the trusts who have not applied for registration/ approval within the prescribed time limit will be taxed. This amendment has come into effect from 01.04.2023 and therefore applies to the assessment year 2023-24 and subsequent assessment years.

The CBDT has extended the due date for furnishing of statement of donation in Form No. 10BD and the certificate of donation in Form No. l0BE in respect of the donations received during the financial year 2022-23 to 30.06.2023. Many trusts who have not yet filed this statement should take the opportunity to file, otherwise the donations made would not be eligible for deduction to the donor.

It has been clarified that the provisional approval or provisional registration for section 10(23C), section 11 or section 80G, shall be effective from the assessment year relevant to the previous year in which the application is made and shall be valid for three assessment years subject to the provisions of the relevant sections.

It is clarified that the statement of accumulation in Form No. 10 and Form No. 9Amust be furnished at least two months before the due date of furnishing the return of income so that it may be taken into account while auditing the books of account. However, the accumulation/deemed application shall not be denied to a trust as long as the statement of accumulation/deemed application is furnished on or before the due date of furnishing the return as per section 139(1).

The Auditor's Report furnished in Form No. 10B and Form No. 10BB requires the auditor to bifurcate certain payments or applications in electronic modes and nonelectronic modes. It has been clarified that for the purposes of Form No. 10B and Form No. 10BB, electronic modes referred are in addition to the account payee cheque drawn on a bank or an account payee bank draft or use of electronic clearing system through a bank account.

Just to reiterate that we remain available over telecom or e-mail.

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SYNOPSIS

TAX CALENDAR

Due Date	Form/Return/Challan	Reporting Period	Description
11th June	GSTR-1	May 2023	Summary of outward supplies where turnover exceeds Rs.5 crore or have not chosen the QRMP scheme for Apr-Jun 2023
13th June	GSTR-1 (IFF)	May 2023	Uploading of outward supplies by taxpayers opting to use the Invoice Furnishing Facility (IFF)** under the QRMP scheme
13th June	GSTR-5	May 2023	Summary of outward taxable supplies and tax payable by a non-resident taxable person
13th June	GSTR-6	May 2023	Details of ITC received and distributed by an ISD
14th June	TDS certificate	April 2023	Due date for issue of TDS Certificate for tax deducted under section 194-IA, 194-IB, 194M, 194S in the month of April, 2023
15th June	Form 24G	May 2023	Due date for furnishing of Form 24G by an office of the Government where TDS/TCS for the month of May, 2023 has been paid without the production of a challan
15th June	TDS certificate	March 2023	Quarterly TDS certificates (in respect of tax deducted for payments other than salary) for the quarter ending March, 2023
15th June	Advance Tax	AY 2024-25	First instalment of advance tax for the assessment year 2024-25
15th June	TDS certificate	FY 2022-23	Certificate of tax deducted at source to employees in respect of salary paid and tax deducted during Financial Year 2022-23
15th June	Form 3BB	May 2023	Due date for furnishing statement in Form no. 3BB by a stock exchange in respect of transactions in which client codes been modified after registering in the system for the month of May, 2023

INCOME TAX

NOTIFICATION

CBDT NOTIFIES SECTION 10(23FE) EXEMPTIONS FOR FOREIGN PENSION FUND – 2743298 ONTARIO LIMITED

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Notification No. 36/2023 dated 07.06.2023 notified In exercise of the powers conferred by sub-clause (iv) of clause (c) of the Explanation 1 to clause (23FE) of section 10 of the Income-tax Act, 1961 (43 of 1961) (hereinafter referred to as the Act), the Central Government hereby specifies the pension fund, namely, 2743298 Ontario Limited (PAN: AACCZ0130B), (hereinafter referred to as the assessee) as the specified person for the purposes of the said clause in respect of the eligible investment made by it in India on or after the date of publication of this notification in the Official Gazette but on or before the 31st day of March, 2024 (hereinafter referred to as the said investments) subject to the fulfilment of the following conditions, namely:-

(i) the assessee shall file return of income, for all the relevant previous years falling within the period beginning from the date in which the said investment has been made and ending on the date on which such investment is liquidated, on or before the due date specified for furnishing the return of income under sub-section (1) of section 139 of the Act;

(ii) the assessee shall furnish along with such return a certificate in Form No. 10BBC in respect of compliance to the provisions of clause (23FE) of section 10 of the Act, during the financial year, from an accountant as defined in the Explanation below sub-section (2) of section 288 of the Act, as per the provisions of clause (vi) of rule 2DB of the Income–tax Rules, 1962;

(iii) the assessee shall intimate the details in respect of each investment made by it in India during the quarter within one month from the end of the quarter in Form No. 10BBB, as per the provisions of clause (v) of rule 2DB of the Income-tax Rules, 1962;

(iv) the assessee shall maintain a segmented account of income and expenditure in respect of such investment which qualifies for exemption under clause (23FE) of section 10 of the Act;

(v) the assessee shall continue to be regulated under the laws of the Government of the Province of Ontario, or the federal laws of the Government of Canada, or both;

(vi) the assessee shall be responsible for administering or investing the assets for meeting the statutory obligations and defined contributions of one or more funds or plans established for providing retirement, social security, employment, disability, death benefits or any similar compensation to the participants or beneficiaries of such funds or plans, as the case may be;

(vii) the earnings and assets of the assessee should be used only for meeting statutory obligations and defined contributions for participants or beneficiaries of funds or plans referred to in clause (vi) and no portion of the earnings or assets of the pension fund inures any benefit to any other private person; barring any payment made to creditors or depositors for loan or borrowing [as defined in sub-clause (b) of clause (ii) of Explanation 2 to clause (23FE) of section 10 of the Act] taken for the purposes other than for making investment in India;

(viii) the assessee shall not have any loans or borrowings [as defined in sub-clause(b) of clause (ii) of Explanation 2 to clause (23FE) of section 10 of the Act], directly or indirectly, for the purposes of making investment in India; and

(ix) the assessee shall not participate in the day to day operations of investee [as defined in clause (i) of Explanation 2 to clause (23FE) of section 10 of the Act] but the monitoring mechanism to protect the investment with the investee including the right to appoint directors or executive director shall not be considered as participation in the day to day operations of the investee.

2. Violation of any of the conditions as stipulated in the said clause (23FE) of section 10 of the Act and this notification shall render the assessee in eligible for the tax exemption.

3. This notification shall come into force from the date of its publication in the Official Gazette.

[For further details please refer the notification]

CIRCULAR

CBDT REVISES MONETARY LIMIT EXCEPTIONS FOR APPEALS UNDER SECTION 158AB

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Circular No. 8/2023 dated 31.05.2023

circulated that The Board has, from time-to-time, revised monetary thresholds for filing appeals before various judicial I. The last such revision was through Circular No. 17/2019 dated 08.08.2019. Exceptions to the monetary limits are as per B'ard's letter F. No. 279/Misc.142/2007-ITJ(Pt.) dated 20.08.2018 and OM issued vide F.No.279/Misc/M-93/2018-ITJ(Pt.) dated 16.09.2019.

2. In this respect the insertion Section 158AB in the Income Tax Act, 1961 [hereinafter referred to as the Act] has led to queries on monetary limits and exceptions applicable in respect of cases falling within the purview of Section 158AB of the Act. In supersession of the letter dated 29.09.2022, referred to above, the following guidelines on the above subject are hereby issued:

3. At the outset it is clarified that references to collegiums constituted u/s 158AB of the Act for deciding on the deferral of appeal(s)/grounds of appeal(s) would be made having regard to the extant monetary limits read along with the exceptions to the same, as mentioned in para 1 above and the exceptions provided in para 6 below.

4. **The following terminology is proposed in respect of para 5 below:**

(i) **Yo:** the current year in which appeal filing is under consideration, and

(ii) **Yf** : the year in which the final decision on the question of law is received in favour of Revenue in 'he 'other 'as'' ('other 'ase' being as referred to in section 158AB of the Act).

5. **Scenarios on the applicability of monetary limits:**

(i) In cases where only one ground is contested and where the tax effect is greater than the monetary threshold as per the extant monetary limits for filing appeals at relevant judicIfora, set by CBDT, and section 158AB is applicable to it, appeal may be deferred in the current year (**Yo**) in view of the provisions of section 158AB. The appeal is to be filed in the year in which the final decision on the identical question of law is received in favour of Revenue in **Yf.**

(ii) In cases where multiple grounds are contested and where the total tax effect of all the disputed grounds (i.e., grounds to which Section 158AB is applicable and otherwise) is greater than the extant monetary limits for filing appeals at relevant jlial fora, set by CBDT, and Section 158AB is applicable only to certain grounds, the guidelines for filing appeal are as follows:

(a) in the current year (Yo),

i. filing of appeal on the grounds to which section 158AB is applicable may be deferred in view of the provisions of that section, and

ii. appeal may be filed on the residual grounds.

(b) in the year in which the final decision on the identical question of law is received in favour of Revenue in **Vf,** appeal is to be filed on the grounds to which section 158AB is applicable, irrespective of the monetary limit at that point in time.

6. In respect of deferring appeals u/s 158AB of the Act, while adhering to the guidelines as laid down in the preceding paras, it is to be ensured that when judicial finality is achieved in favour of Rev'nue in the''other case', ap'eal in the 'r'levant case' should be **contested on merits** subsequent to the deci'ion in the''other case' irrespective of the extant monetary limits. Further, if the judicial out'ome in the''other case' is not in favour of Revenue and is not accepted by the Department, appeal against the same may be **contested on me'its** in the''other case' irrespective of the extant monetary limits, to arrive at judicial finality.

7. The above shall come into effect from the date of issue of this letter and may be brought to the knowledge of all officers working in your region.

8. This issues under section 268A of the Income Tax Act.

[For further details please refer the circular]

GST

ADVISORY

E-INVOICE VERIFIER APP BY GSTN

OUR COMMENTS: The GSTIN vide advisory dated 08.06.2023 advised that

1. The E-Invoice Verifier App developed by GSTN, has been introduced which offers a convenient solution for verifying e-Invoices and other related details. GSTN understands the importance of efficient and accurate e-invoice verification, and this app aims to simplify the process for your convenience.

2. E-Invoice V–rifier App - Key Features and Benefits:

i. QR Code Verification: The app allows users to scan the QR code on an e-Invoice and authenticate the embedded value within the code. This helps in identifying the accuracy and authenticity of the e-Invoice.

ii. User-Friendly Interface: The app provides a user-friendly interface with intuitive navigation, making it easy for users to navigate thr'ugh the app's features and functionalities.

iii. Comprehensive Coverage: The app supports verification of e-Invoices reported across all six IRPs, ensuring comprehensive coverage and convenience.

iv. Non-Login Based: The app operates on a non-login basis, meaning users are not required to create an account or provide sensitive personal information to access its functionalities. This simplifies the user experience and makes it more convenient for users.

3. How to use the e-Invoice Verifier App:

i. Download the App: Visit the Google Play Store and"search for "E-Invoice QR Co"e Verifier." Download and install the app on your mobile device free of charge. The iOS version will be available shortly.

ii. QR Code Scanning: Utilise the app to scan the QR codes on your e-Invoices. The app will authenticate the information embedded in the code and one can compare it with information printed on the invoice.

4. GSTN emphasizes that the e-Invoice Verifier App does not require any user login or authentication process. Anyone can freely scan QR codes and view the available information.

5. For more detailed information please see the FAQs in the app. This comprehensive FAQ document will provide you with additional guidance on using the app and resolving any queries you may have.

[For further details please refer the advisory]

CASE LAW

CONSTITUTIONAL VALIDITY OF GST RULES ON TAXING INTERMEDIARY SERVICES FOR CLIENTS ABROAD: BOMBAY HIGH COURT

OUR COMMENTS: Constitutional Validity of section 13(8)(b) and section 8(2) of the Integrated Goods and Services Tax Act, 2017 has been discussed in this case. Constitutional validity of provisions for determination of place of supply or Zero rated supply for intermediary services has been discussed in this matter.

It has been held that, the matters have been placed before us pursuant to an administrative order dated 19th May, 2023, of the then Hon'ble The Acting Chief Justice in accordance with the Rules, for pronouncement of the final judgment for disposing of the matters.

Considering the views taken by our learned brother Hon'ble Shri. Justice G.S.Kulkarni and one of us (Abhay Ahuja, J.) [2023 (4) TMI 821 - BOMBAY HIGH COURT], we hold the provisions of Section 13(8)(b) and Section 8(2) of the IGST to be legal, valid and constitutional.

It is to be noted that the matter initially came before the high court in 2021 and was eventually transferred to a single bench, since the division bench couldn't reach an agreement.

It has been held It is seen that insofar as the IGST Act is concerned, "export of services" as defined under Section 2(6) fall within the purview of the provisions of Section 16, namely, the provision made for "zero rated supply". The contention of the petitioners is also to the effect that once a transaction is of export of services and as defined under Section 2(6) of the IGST Act, in regard to which there is no definition under Section 2 of CGST Act or under section 2 of MGST Act, Section 13(8)(b) cannot by a legal fiction and/or an implication form any transaction to be taxed under the

CGST Act and MGST Act, by categorizing it to be an intra-State sale.

A bare reading of Section 9 of the CGST Act would indicate that subject to the provisions of sub-section (2) thereof, there shall be levy of a tax called the Central Goods and Services Tax on all "intra-State supplies of goods or services or both". By virtue of Section 2(65) of the CGST Act 'intra-State supply of services' is required to have the same meaning as assigned to it in Section 8 of the IGST Act - Section 8 of the IGST Act provides for 'intra-State supply'. Section 8(2) of the IGST Act provides that subject to the provisions of Section 12, the supply of services where the location of the supplier and the place of supply of services are in the same State or same Union Territory shall be treated as intra-State supply. Sub-section (2) of Section 8 recognizes the effect of Section 12(2) namely that the place of supply of services made to any person other than a registered person shall be the location of the supplier of services and hence, for transaction of such nature, the supply of services becomes an intra-State supply. The consequence brought about by such provision is that by mere inclusion of Section 8 of the IGST Act within the provisions of Section 2(65) of the CGST Act, which defines 'intra-State supply of services', a legal effect which emerges is that not only Section 8 of IGST Act, but also the accompanying provisions, namely, Section 12 relating to the place of supply of services, stands embedded, implanted and/or incorporated, and are deemed to form an integral part of the CGST Act.

Similarly, Section 2(86) of the CGST Act defines 'place of supply' to mean the place of supply as referred to in Chapter V of the IGST Act. Thus, Chapter V of the IGST Act stands incorporated under the provisions of the CGST Act. Chapter V of the IGST Act, which deals with the place of supply of goods or services or both, contain the provisions from Section 10 to Section 14 incorporating within such Chapter the impugned provision, namely Section 13(8)(b).

The conflict is that, the export of services for a commission to be received by the petitioners, fructify only after the goods are supplied by the foreign principals who are beneficiaries of the export of services provided by the intermediaries and the same are received as imports by the Indian purchasers. Thus, applying the destination principle, the amount by way of commission, to be paid to the petitioners are already subsumed in the transaction which the foreign principal may have with its customer (the Indian importer) on which the Indian importer is already being taxed - there is another apparent incongruity which can be noted from the conjoint reading of sub-Section (5) of Section 7 and the provisions of Section 13(8)(b) of the IGST Act. This is to the effect that sub-section (5) of Section 7, which categorically provides that in regard to supply of goods or services or both, when a supplier is located in India and the place of supply is outside India, such supply of goods or services shall be treated to be a supply of goods or services or both, "in the course of Inter-State trade or commerce", whereas in respect of a clear transaction of export of service as defined under sub-section (6) of Section 2 by virtue of Section 13(1), which provides that such provision shall apply to determine the place of supply of services where the location of the supplier of services or recipient of services is outside India, shall be the location of the supplier of services, when it concerns intermediary services, that is to classify the export of service as an 'intra-State' trade or commerce.

What can be discerned and derived, is that it is necessary to confine transactions which are clearly transactions in the course of Inter-State trade or commerce and more particularly transactions of export of services as defined under Section 2(6) of the IGST Act and the intermediary services, to be subjected, relevant and confined only to the provisions of the IGST Act, and transactions which are in the course of Intra-State trade or commerce, shall remain confined to the provisions of the CGST Act and the MGST Act - the approach of the Court would be by interpretative process to make the provisions of the respective enactments meaningful for their smooth and effective implementation. The duty of the Court would also to accept the constitutionality of the provision rather than being tilted to read the provision to be ultra-virus or unconstitutional. It may be observed that it is well-settled that every provision in an enactment is required to be understood and interpreted within the framework of the object and intention the legislation intends to achieve.

The provisions of Section 13(8)(b) and the provisions of Section 8(2) of IGST Act be struck down as unconstitutional being violative of the provisions of Articles 14, 19(1)(g), 245, 246, 246A, 265, 269A and 286 of the Constitution. This more particularly considering the fact that the impugned provisions insofar as they stand and are applicable only under IGST Act. It may be observed that the legislative wisdom to have the provisions of Section 2(6), Section 7, Section 8(2), Section 12 and Section 13 under the IGST Act and the consequence of any such transaction of export of service being scrutinized for the benefit under Section 16 of a Zero Rated Tax, need not be gone into, suffice it to observe that the mechanism for Section 13(8)(b) to operate is confined only to the provisions of the IGST Act - insofar as the provisions of Section 13(8)(b) is concerned, the same are required to be read to confined only to the provisions of the IGST Act. Constitutionally and for the reasons as discussed in the forgoing paragraphs, it is not permissible for such provision to operate under the CGST Act and the MGST Act. It is not possible to foresee and visualize such provision becoming relevant in case of a particular transaction which may purely fall under the IGST Act.

The provisions of Section 13(8)(b) and Section 8(2) are confined in their operation to the provisions of IGST Act only and the same cannot be made applicable for levy of tax on services under the CGST Act and MGST Act, on such interpretation, the provisions are intra vires the Constitution, the IGST, the CGST and the MGST Acts - it is not necessary to consider the validity of the impugned provisions on the touchstone of Articles 14 and 19(1)(g) of the Constitution as canvassed by the petitioners.

The provisions of Section 13(8)(b) and Section 8(2) of the IGST Act are legal, valid and constitutional, provided that the provisions of Section 13(8)(b) and Section 8(2) are confined in their operation to the provisions of IGST Act only and the same cannot be made applicable for levy of tax on services under the CGST and MGST Acts - The office to place the matter before the Division Bench.

CIRCULAR

RBI'S REGULATORY UPDATES ON NON-DELIVERABLE DERIVATIVE CONTRACTS

OUR COMMENTS: The Reserve Bank of India vide circular no. 05 dated 06.06.2023 circulated that Paragraph 1 of the Statement on Developmental and Regulatory Policies announced as a part of the first Bi-monthly Monetary Policy Statement for 2023-24 dated April 06, 2023 regarding development of the onshore non-deliverable derivative market. Attention of Authorised Dealers Category – I (AD Cat-I) banks is invited to the Foreign Exchange Management (Foreign Exchange Derivative Contracts) Regulations, 2000 dated May 3, 2000 (Notification No. FEMA.25/RB-2000 dated May 3, 2000), as amended from time to time, and Master Direction – Risk Management and Inter-Bank Dealings dated July 5, 2016, as amended from time to time.

2. As per the extant regulatory framework, AD Cat-I banks operating International Financial Services Centre (IFSC) Banking Units (IBUs) are permitted to offer non-deliverable derivative contracts (NDDCs) to persons resident outside India. Such derivatives are cash-settled in foreign currency. With a view to developing the onshore INR NDDC market and providing residents the flexibility to efficiently design their hedging programmes, it has been decided to permit:

(a) AD Cat-I banks operating IBUs to offer NDDCs involving INR to resident non-retail users for the purpose of hedging. Such transactions shall be cash settled in INR; and

(b) The flexibility of cash settlement of NDDCs transactions between two AD Cat-I banks, and between an AD Cat-I bank and a person resident outside India in INR or any foreign currency.

3. Accordingly, the amendments being made to the Master Direction – Risk Management and Inter-Bank Dealings dated July 5, 2016, as amended from time to time, are placed at Annex as mentioned in the circular.

4. The directions contained in this circular have been issued under Sections 10(4) and 11(1) of the Foreign Exchange Management Act, 1999 (42 of 1999) and are without prejudice to permissions/ approvals, if any, required under any other law.

[For further details please refer the circular]

CUSTOMS

NOTIFICATION

RATE OF EXCHANGE OF ONE UNIT OF FOREIGN CURRENCY EQUIVALENT TO INDIAN RUPEES - TURKISH LIRA

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide notification No. 41/2023-Customs(N.T) dated 08.06.2023 notified In exercise of the powers conferred by section 14 of the Customs Act, 1962 (52 of 1962), the Central Board of Indirect Taxes and Customs hereby makes the following amendments in the Central Board of Indirect Taxes and Customs Notification No.39/2022-CUSTOMS (N.T.), dated 1st June, 2023 with effect from 9th June, 2023.

In the SCHEDULE-I of the said Notification, for serial No.18 and the entries relating thereto, the following shall be substituted, namely: -

SCHEDULE-I

Sl. No.	Foreign Currency	Rate of exchange of one unit of foreign currency equivalent to Indian rupees	
(1)	(2)	(3)	
		(a)	**(b)**
		(For Imported Goods)	**(For Export Goods)**
18.	Turkish Lira	3.65	3.45

[For further details please refer the notification]

NOTIFICATION

RATE OF EXCHANGE OF ONE UNIT OF FOREIGN CURRENCY EQUIVALENT TO INDIAN RUPEES - TURKISH LIRA

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide notification No. 40/2023-Customs(N.T) dated 07.06.2023 notified In exercise of the powers conferred by section 14 of the Customs Act, 1962 (52 of 1962), the Central Board of Indirect Taxes and Customs hereby makes the following amendments in the Central Board of Indirect Taxes and Customs Notification No.39/2023-CUSTOMS (N.T.), dated 1st June, 2023 with effect from 8th June, 2023.

In the SCHEDULE-I of the said Notification, for serial No.18 and the entries relating thereto, the following shall be substituted, namely: -

SCHEDULE-I

Sl. No.	Foreign Currency	Rate of exchange of one unit of foreign currency equivalent to Indian rupees	
	(2)	(3)	
		(a)	**(b)**
		(For Imported Goods)	**(For Export Goods)**
18.	Turkish Lira	3.85	3.60

[For further details please refer the notification]

CIRCULAR

PRE-IMPORT CONDITION & IMPLICATIONS ON IGST & COMPENSATION CESS

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Circular No. 16/2023-Cus dated 07.06.2023 circulated that Attention is invited to Hon'ble Supreme Court judgment dated 28.04.2023 in matter of Civil Appeal No. 290 of 2023 (UOI and others vs. Cosmo Films Ltd.) relating to mandatory fulfilment of a 'pre-import condition' incorporated in para 4.14 of FTP 2015-20 vide the Central Government (DGFT) Notification No. 33/2015-20 dated 13.10.2017, and reflected in the Notification No. 79/2017-Customs dated 13.10.2017, relating to Advance Authorization scheme.

2. The FTP amended on 13.10.2017 and in existence till 09.01.2019 had provided that imports under Advance Authorization for physical exports are also exempt from whole of the integrated tax and compensation cess, as may be provided in the notification issued by Department of Revenue, and such imports shall be subject to pre-import condition.

3. Hon'ble Supreme Court has allowed the appeal of Revenue directed against a judgement and order of

Hon'ble Gujarat High Court which had set aside the said mandatory fulfilment of pre-import condition. As such, this implies that the relevant imports that do not meet the said pre-import condition requirements are to pay IGST and Compensation Cess to that extent.

4. While allowing the appeal of Revenue, the Hon'ble Supreme Court has however directed the Revenue to permit claim of refund or input credit (whichever applicable and/or wherever customs duty was paid). For doing so, the respondents shall approach the jurisdictional commissioner, and apply with documentary evidence within six weeks from the date of the judgment. The claim for refund/credit, shall be examined on their merits, on a case by-case basis. For the sake of convenience, the revenue shall direct the appropriate procedure to be followed, conveniently, through a circular in this regard.

5.1 The matter has been examined in the Board for purpose of carrying forward the Hon'ble Supreme Court's directions. It is noted that -

(a) ICES does not have a functionality for payment of customs duties on a bill of entry (BE) (unless it has been provisionally assessed) after giving the Out-of-Charge (OOC) to the goods. In this situation, duties can be paid only through a TR-6 challan.

(b) Under GST law, the BE for the assessment of integrated tax/ compensation cess on imports is one of the documents based on which the input tax credit may be availed by a registered person. A TR-6 challan is not a prescribed document for the purpose.

(c) The nature of facility in Circular No. 11/2015-Cus (for suo moto payment of customs duty in case of bona fide default in export obligation) is not adequate to ensure a convenient transfer of relevant details between Customs and GSTN so that ITC may be taken by the importer.

(d) The section 143AA of the Customs Act, 1962 provides that the Board may, for the purposes of facilitation of trade, take such measures for a class of importers-exporters or categories of goods in order to, inter alia, maintain transparency in the import documentation.

5.2 Keeping above aspects in view, noting that the order of the Hon'ble Court shall have bearing on importers others than the respondents, and for purpose of carrying forward the Hon'ble Court's directions, the following procedure can be adopted at the port of import (POI):

(a) for the relevant imports that could not meet the said pre-import condition and are hence required to pay IGST and Compensation Cess to that extent, the importer (not limited to the respondents) may approach the concerned assessment group at the POI with relevant details for purposes of payment of the tax and cess along with applicable interest.

(b) the assessment group at POI shall cancel the OOC and indicate the reason in remarks. The BE shall be assessed again so as to charge the tax and cess, in accordance with the above judgment.

(c) the payment of tax and cess, along with applicable interest, shall be made against the electronic challan generated in the Customs EDI System.

(d) on completion of above payment, the port of import shall make a notional OOC for the BE on the Customs EDI System [so as to enable transmission to GSTN portal of, inter alia, the IGST and Compensation Cess amounts with their date of payment (relevant date) for eligibility as per GST provisions].

(e) the procedure specified at (a) to (d) above can be applied once to a BE.

6.1 Accordingly, the input credit with respect to such assessed BE shall be enabled to be available subject to the eligibility and conditions for taking input tax credit under Section 16, Section 17 and Section 18 of the CGST Act, 2017 and rules made thereunder.

6.2 Further, in case such input tax credit is utilized for payment of IGST on outward zero-rated supplies, then the benefit of refund of such IGST paid may be available to the said registered person as per the relevant provisions of the CGST Act, 2017 and the rules made thereunder, subject to the conditions and restrictions provided therein.

7. The Chief Commissioners are expected to proactively guide the Commissioners and officers for ironing out any local level issues in implementing the broad procedure described in para 5 and 6 above and ensuring appropriate convenience to the trade including in carrying out consequential actions. For this, suitable Public Notice and Standing Order should be issued. If any difficulties are faced that require attention of the Board, those can be brought to the notice.

Hindi version follows.

[For further details please refer the circular]

CIRCULAR

MANDATORY ADDITIONAL QUALIFIERS IN IMPORT/EXPORT DECLARATIONS IN RESPECT OF CERTAIN PRODUCTS WEF 1.7.2023

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Circular No. 15/2023-Cus dated 07.06.2023 circulated that Reference is drawn to the Circular 55/2020-Customs dated 17.12.2020 wherein importers were advised to voluntarily declare the complete description of imported goods and provide certain additional parameters for imported items such as scientific names, IUPAC names, brand name etc., as applicable, to aid reducing queries and improve the efficiency of assessment.

2. The matter was further reviewed in consultation with the Dept. of Chemicals and Petrochemicals, Ministry of AYUSH and the Directorate General of Foreign Trade (DGFT) and it is noted that more complete details of the products in import/export declarations can lead to effective avoidance of queries, enhancing efficiency in assessment and facilitation, avoid making references to technical agencies and addressing basic causes for delays in clearance, apart from better aiding policy-making.

3. Accordingly, in consultation with the concerned line ministries, the following mandatory additional qualifiers are being added for purposes of import or export declarations, as the case may be, -

Additional qualifiers in respect of imports:

4.1 In consultation with the Department of Chemicals and Petrochemicals, and in terms of the Bill of Entry (Electronic Integrated Declaration and Paperless Processing) Regulations 2018 , it has been decided to enable the following additional qualifiers as mandatory from the beginning, that is, the time of filing import declarations itself :

a. the declaration of IUPAC name and CAS number of the constituent chemicals, for imports under the chapters 28, 29, 32, 38 and 39 of the Customs Tariff Act, 1975.

4.2 These additional qualifiers shall be mandatory for imports under the said chapters for all bills of entry filed on or after 01.07.2023, in the manner mentioned in the Annexure-1 to this Circular. These fields shall be in addition to the existing declaration being made by importers.

Additional qualifiers in respect of exports:

5.1 In consultation with the Ministry of AYUSH and DGFT; and in terms of Shipping Bill (Electronic Integrated Declaration and Paperless Processing) Regulations 2019, it has been decided to enable the following additional qualifiers as mandatory from the beginning, that is, the time of filing export declarations itself :

a. the declaration of the name of the medicinal plant, for exports of parts of plants under chapter 12;

b. the declaration of the name of the formulation, for exports of formulations of different streams of medicine under chapter 30;

c. the declaration of the surface material that comes into contact with the chemical, for exports of various products under chapter 84.

5.2 These additional qualifiers shall be mandatory for exports under the specific CTHs of the said chapters for all Shipping bills filed on or after 01.07.2023, in the manner mentioned in the Annexure-2 to this Circular. These fields shall be in addition to the existing declaration being made by exporters.

6. Suitable Public Notice etc may kindly be issued for guidance. Any difficulties faced or doubts arising in the implementation of this Circular may please be brought to the notice of Board.

7. Hindi version follows.

[For further details please refer the circular]

CIRCULAR

ELECTRONIC REPAIRS SERVICES OUTSOURCING (ERSO) – INITIATION OF PILOT AT ACC BENGALURU

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Circular No. 14/2023-Cus dated 03.06.2023 circulated that Electronic Repairs Services Outsourcing (ERSO) is an initiative of the Government of India involving MeitY, MOEF&CC, DGFT, and CBIC working in convergence with the industry [Manufacturers Association of Information Technology (MAIT)]. ERSO involves import of goods (defective, damaged electronic goods) by designated repair service entities in India, to reliably repair them and re-export the goods. The repairs services outsourced to the service entities in India enables extension of the life of the electronic goods which is in sync with India's commitment to the environment.

2. To provide the regulatory environment, amongst other aspects, the DGFT has issued Public Notice No. 31/2015-20 dated 14.10.2022 for allowing General Authorization for Export after Repairs in India (GAER), the MOEF&CC has issued F.No. 23/151/2022-HSM dated 02.01.2023 providing relaxation to dispose certain goods which are beyond repairs up to specified limit. Further, the Commissioner of Customs Airport and Air Cargo, Bengaluru has issued Public Notice No. 7 dated 27.05.2023 which is a procedure being tested for import and re-export clearances under ERSO (by specified importers- exporters) with aim of achieving the ecosystem conducive to providing quick and reduced turn-around time imperative for being a repair destination for ICT products globally.

3. The above aspects are being validated for their efficiency and efficacy through ERSO Pilot launched on 31.05.2023. The MeitY's press release with PIB PRID=1928643 may be referred.

4. Few aspects of the Customs procedure for import and re-export via the Customs Station at Air Cargo Complex, Bengaluru are –

a. bills of entry or shipping bills need to be filed in advance to enable processing to the extent feasible prior to arrival of goods.

b. error free filing of above import or re-export declarations would obviate need for amendment and minimize clearance time.

c. uploading of all the necessary documents in legible form in e-Sanchit would obviate the need for customs seeking clarification through query module thereby minimizing clearance time.

d. Importers to 1use appropriate continuity/running re-export (RE) Bond [without Bank Guarantee], which would be registered at ACC, Bengaluru. The EDI System would debit the amount involved against each import. The importer would be able to check the balance of the bond amount available on ICEGATE system to decide the requirement to submit additional bond when the balance is insufficient. Once the re-export is made, bond is re-credited by officer at ACC, Bengaluru.

e. A nodal officer in the grade of DC/AC, along with a core team of Superintendents/ Appraisers for ERSO, for specifically coordinating all ERSO matters is nominated by the Commissioner of Customs, Bengaluru. The nodal officer and team shall pro-actively fast track every stage post the filing of import/export declaration. These stages include assessment including at faceless assessment groups, examination at location etc. The fast-tracking shall be carried out at all locations in coordination with respective faceless assessment groups and also at ACC, Bengaluru. The concerned entity/ custom broker is expected to share in advance the details of ERSO imports/exports.

f. Nature of goods being such as are regarded to have been taken into use before import, and the re-export being of a nature that the goods exported are same as the goods imported, examination is required. Therefore, the importer should opt for first check [CBIC will explore developing

automated standardized examination order for ERSO imports.] while filing the import declaration.

g. While the bill of entry would get assigned to a faceless assessment group, the nodal officer shall ensure that, without waiting for the first check order on the bill of entry, the examination in first check is begun immediately on arrival of goods, and completed.

h. an empaneled Chartered Engineer is involved with examination for purposes of identity etc. of the ERSO imports. In exceptional cases, if during import process a difficulty in identification of the product arises, then at the time of examination in first check, the product may be made amenable to establishment of its identity on re-export, through use of an appropriate technology. The procedure of this may be laid out through Public Notice by the Commissioner of Customs, Airport and Air Cargo, Bengaluru.

i. Provisioning of designated & earmarked areas with suitably controlled environment for purposes of examination of the ERSO goods at [In a situation where, for reasons beyond the control of the entity, it becomes necessary to explore alternative suitable controlled environment for examination, the Commissioner would explore other options, including movement (as per section 49 of Customs Act, 1962) to nearby public bonded warehouse with such facility or on-site inspection (with suitable safeguards)] Air Cargo Complex, Bengaluru during the inward and outward movements of the ERSO goods, provides an enabling business ready environment for expeditious processing in conduct of above Customs procedures.

5. The National Assessment Centre handling electronic goods/ ICT products and the Faceless Assessment Groups' officers, as well as the officers of the Customs Zones are sensitized that the ERSO eco system is one of import → examine in first check → repair → identify & re-export. Therefore, the NAC is to ensure expedited assessment in a standardized manner.

6. The Bengaluru Customs Zone is expected to take all measures necessary in relation to ERSO, including augmentation of resources, if necessary, in coordination with the Bengaluru CGST Zone, and to resolve all issues that come up during the implementation. A log of such aspects may be kept and Board kept informed. Progress in activities under ERSO may be reported weekly during the pilot phase of first three months. A review will be carried out based on the feedback and modifications made in the process etc. as necessary.

Hindi version follows.

[For further details please refer the circular]

DGFT

NOTIFICATION

AMENDMENT IN IMPORT POLICY CONDITION 6 (PET COKE) UNDER CHAPTER 27 OF SCHEDULE –I (IMPORT POLICY) OF ITC (HS) 2022

OUR COMMENTS: The Ministry of Commerce & Industry vide notification no 10/2023 dated 02.06.2023 notified In exercise of powers conferred by Section 3 and Section 5 of Foreign Trade (Development & Regulation) Act, 1992, read with paragraph 1.02 and 2.01 of the Foreign Trade Policy, 2023, as amended from time to time, the Central Government hereby amends the Policy Condition 6 of Chapter 27 of Schedule –I (Import Policy) of ITC (HS) 2022 as under:

Existing Policy Condition 6	Revised Policy Condition 6
Import of pet coke for fuel purpose is prohibited. However, import of Pet coke is free for cement, lime kiln, calcium carbide, gasification industries and graphite electrode industries for use as feed stock or in the manufacturing process only on Actual User basis. Further, Aluminium industry can import Calcined Pet Coke not exceeding 0.5 MT per annum and Calcined Pet coke manufacturing units can import raw pet coke not exceeding 1.4MT per annum. Regulation and monitoring of such imports will be as per the guidelines of Ministry of Environment, Forest and Climate Change issued vide O.M. No. Q-18011/54/2018-CPA dated September 10, 2018	Import of pet coke for fuel purpose is 'Prohibited'. However, import of Pet coke of the following categories shall be permitted, subject to conditions : Import of Pet coke is 'Free' for **cement, lime kiln, calcium carbide, gasification industries and graphite electrode industries** for use as feed stock or in the manufacturing process only on Actual User basis. **Aluminium industry** can import Calcined Pet Coke not exceeding 0.5 MT per annum and Calcined Pet coke manufacturing units can import raw pet coke not exceeding 1.4 MTs per annum. Import of Needle Pet Coke (NPC) (under HS Code 27131190) is 'Free' for making graphite anode material for L**i-Ion battery** as feedstock /raw material and not for any other purposes including use as a fuel or for trade. The Sulphur content in the NPC should be less than 0.8% which shall be monitored by State Pollution Control Boards (SPCBs)/CPCB. Import of Low Sulphur Pet Coke (under HS Code 27131190) is 'Restricted' and permitted subject to Import Authorisation from DGFT for use in I**ntegrated Steel Plants (ISP) only** for blending with the coking coal in recovery type coke ovens equipped with desulphurisation plant and not for any other purpose including use as fuel or for trade purpose. Use of pet coke shall be limited to 10% of its feedstock to the coke oven with pet coke sulphur content not exceeding 3%. Additionally, continuous analysers for measurement of sulphur dioxide shall be installed in the stacks of processes where waste / process gases which shall be monitored by SPCBs/CPCB. **Low Sulphur Pet Coke shall not be used by the Steel Industry, either ISP or other steel producers, as fuel or for trade.** Regulation and Monitoring of such Pet Coke imports shall be

	as per the guidelines of MoEF&CC, issued vide its OM No.Q-18011/54/2018-CPA dated 10.09.2018.

2. Effect of the Notification:

Import of pet coke for fuel purpose is 'Prohibited'. However, Policy Condition 6 of Chapter 27 of Schedule-I (Import Policy) of ITC (HS) 2022 has been amended to allow import of Needle Pet Coke for making graphite anode material for Li-Ion battery as feedstock/raw material, and Low Sulphur Pet Coke by integrated steel plants only for blending with the coking coal in recovery type coke ovens equipped with desulphurisation plant, subject to terms and conditions set out by MOEF&CC.

This issues with the approval of Minister of Commerce & Industry.

[For further details please refer the Notification]

PUBLIC NOTICE

IMPORT OF WATERMELON SEEDS UNDER ITC(HS) 12077090 OF ITC(HS), 2()22 SCHEDULE-I (IMPORT POLICY) FOR THE PERIOD UP TO 31.10.2023

OUR COMMENTS: The Ministry of Commerce & Industry vide Public Notice no 13/2023 dated 08.06. In exercise of powers conferred under paragraph 1.03 and 2.04 of the Foreign Trade Policy, 2023, the Directorate General of Foreign Trade hereby notifies the procedure for import of Watermelon Seeds under ITC(HS) 12077090 for the period of up to 31.10.2023 as follows-

1. As per the recommendation from the concerned ministry, the imports of Watermelon Seeds **up to 31.10.2023** shall not exceed **35,000 MTs and shall be allowed on Actual User basis**. Accordingly, DGFT invites fresh applications for Licence for Restricted imports for Watermelon Seeds with effect from the date of this Public Notice and **not later than 15.06.2023** as follows -

i. Applications where the date of issuance of their Importer-Exporter Code (IEC) is on or after the date of this Public Notice shall not be considered.

ii. The applications shall be considered on Actual User basis to processors only, based upon their own processing capacity and past imports of Watermelon Seeds.

iii. A valid FSSAI Licence issued before the date of the Public Notice indicating the processing capacity is required to be provided.

iv. A valid CA Certificate certifying the overall turnover of the applicant as well as the applicant's turnover for watermelon seeds is required to be provided.

v. Only one application against one IEC shall be considered.

vi. In case of any mis-declaration, the applicant shall not be considered for the current allocation and shall be disallowed from subsequent such allocations for the next 2 years.

2. The quantity of imports permitted to each application shall be decided by the Exim Facilitation Committee (EFC) as per para 2.48 of the HBP 2023. The EEC, while examining the applications will take into considerations; inter alia, the annual processing capacity and imports of Watermelon seeds in 2020-21, 2021-22 and 2022-23.

3. 30% weightage shall be given to the average import of watermelon seeds by the applicant(s) in 2020-21, 2021-22 and 2022-23. 70% weightage shall be given to the applicant's processing capacity.

4. Any eligible applicants are entitled for allocation based on the weightage specified. DGFT may however specify a floor and/or ceiling for the quantity(s) to be allocated, to ensure that economic quantities are allocated. Further, DGFT shall reserve the right to make any changes in the allocation process as deemed fit, at any point of time.

5. All prospective Licensees shall ensure that the import consignments against the said licences reach the Indian ports on or before 31.10.2023.

DGFT

Effect of this Public Notice:

Applications are invited for licence for restricted Imports for Watermelon seeds under ITC(HS) 12077090 for import up to 31.10.2023. The last date for submission of online applications is 15.06.2023.

[For further details please refer the Public Notice]

TRADE NOTICE

IMPORTS UNDER ADVANCE AUTHORIZATION SCHEME – DGFT ADVISORY

OUR COMMENTS: The Ministry of Commerce & Industry vide Trade Notice no 07/2023-24 dated 08.06.2023 notified that Reference is drawn to the Hon'ble Supreme Court's judgment dated 28.04.2023 in matter of Civil Appeal No. 290 of 2023 (UOI and others vs. Cosmo Films Ltd.) relating to mandatory fulfilment of 'pre-import condition' incorporated in para 4.14 of FTP 2015-20 vide the Central Government (DGFT) Notification No. 33/2015-20 dated 13.10.2017 and reflected in the Notification No. 79/2017-Customs dated 13.10.2017, relating to Advance Authorization scheme.

2. In compliance to the judgment order dated 28.04.2023 and to carry forward the directions given by the Hon'ble Supreme Court of India in the said judgment, Customs has issued the Circular No. 16/2023 dated 7th June 2023.

3. In light of the above Circular, it is informed that all the imports made under Advance Authorization Scheme on or after 13.10.2017 & upto and including 09.01.2019 which could not meet the pre-import condition may be regularized by making payments as prescribed in the Customs Circular."

4. Further, all the Regional Authorities are requested to proactively guide the Trade and Industry regarding this, and any difficulty may be brought to the notice of this Directorate.

5. This issues with the approval of the Competent Authority.

[For further details please refer the Trade Notice]

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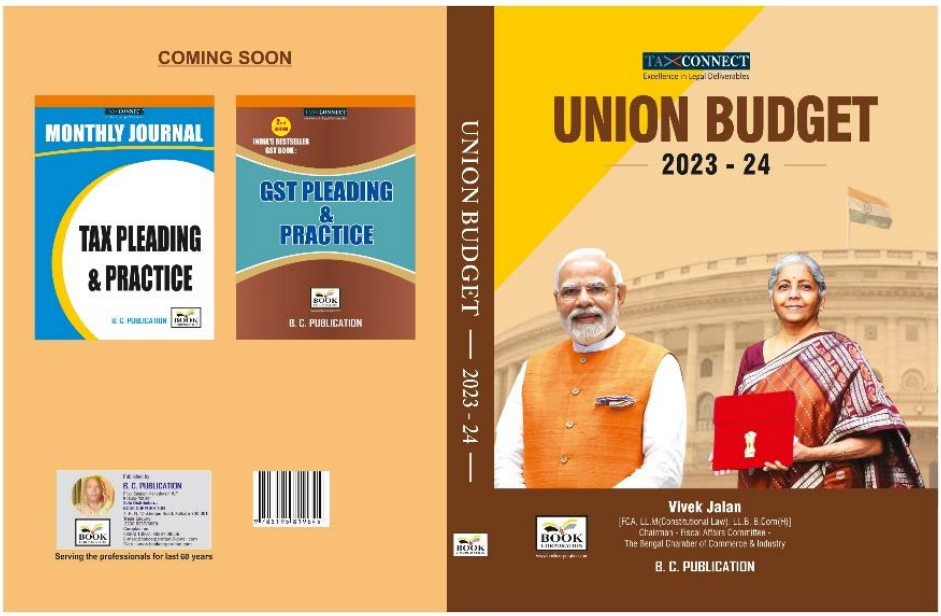
UNION BUDGET 2023: ANALYSIS BY TAX CONNECT



We put before you our detailed Analysis of Direct and Indirect Proposals of Union Budget 2023.

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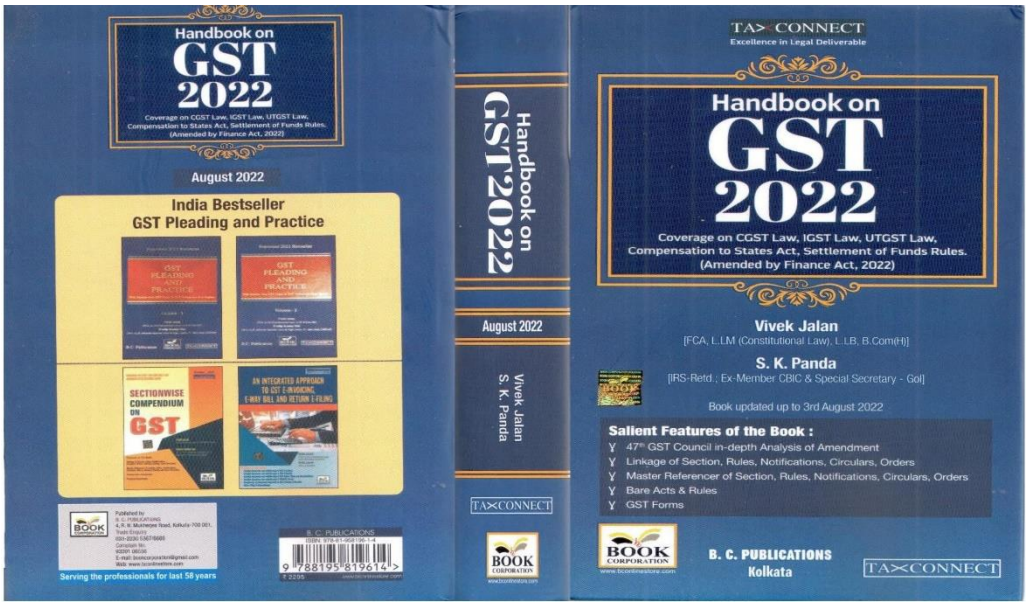
HANDBOOK ON GST 2022



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2. **Linkage of Section, Rules, Notifications, Circulars, Orders**
3. **Master Reference of Section, Rules, Notifications, Circulars, Orders**
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5. **GST Forms**

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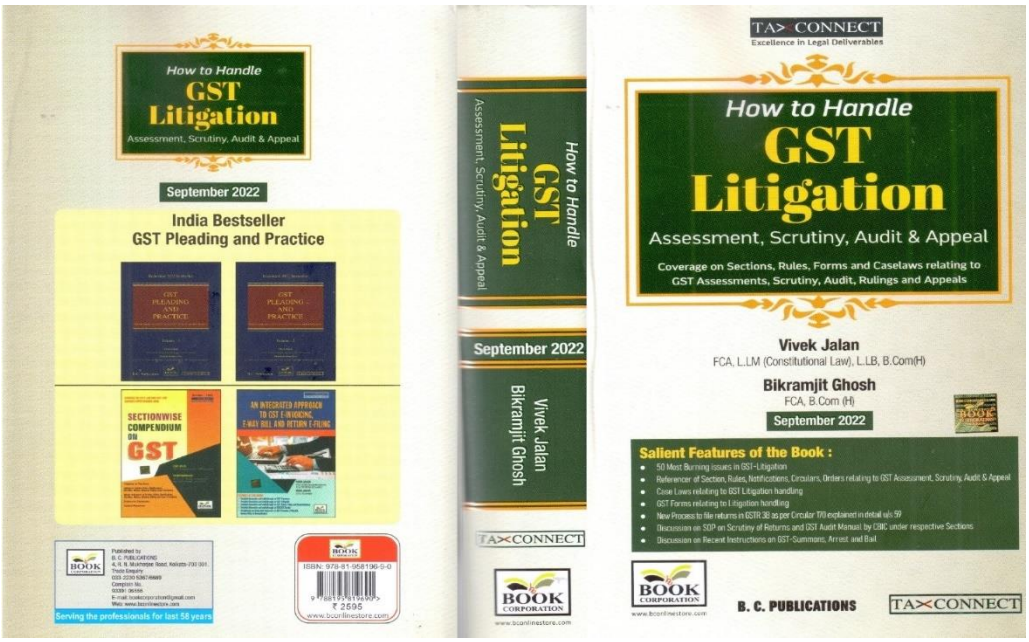
How to Handle GST LITIGATION: Assessment, Scrutiny, Audit & Appeal



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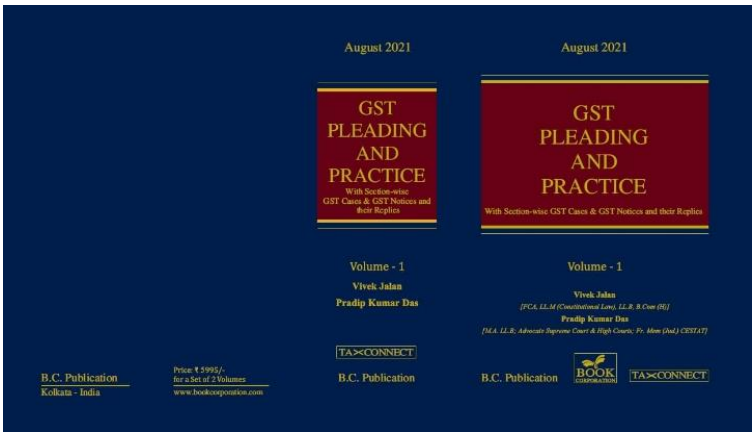

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1. **GST Notices and their Replies**
2. **Orders and Appeals under GST**
3. **Text of provisions under IGST Act 2017 & CGST Act 2017**
4. **CGST & IGST Section-wise Synopsis of Case Laws and Notification/Circulars Gist**
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