

TAX CONNECT

Knowledge Partner:



FEMA. FDI. INCOME TAX. GST. LAND. LABOUR

TAX CONNECT:

- Mumbai** : Unit No. 312, Omega Business Park, Near-Kaamgar Hospital, Road No. 33, Wagle Industrial Estate Thane (West), Maharashtra – 400604
- Bengaluru** : 951, 24th Main Road, J P Nagar, Bengaluru, Karnataka – 560078.
- Delhi (NCR)** : B-139, 2nd Floor, Transport Nagar, Noida-201301 (U.P)
- Kolkata** : 6, Netaji Subhas Road, 3rd Floor, Royal Exchange Building, Kolkata – 700001
- Room No. 119, 1st Floor, “Diamond Arcade” 1/72, Cal Jessore Road, Kolkata – 700055
- Tobacco House, 1, Old Court House St, Radha Bazar, Corner, Kolkata, West Bengal 700001
- Dubai** : Azizi Feirouz, 803, 8th Floor, AL Furjan, Opposite Discovery Pavillion, Dubai, UAE
- Contact** : +91 7003384915
- Website** : www.taxconnect.co.in
- Email** : info@taxconnect.co.in

EDITORIAL



Friends,

The Income Tax Bill 2025 (ITB 2025) brings several significant changes that could impact the assessee, corporates, and professionals alike. While many of these amendments seem minor on the surface, their implications can be far-reaching. Below, we examine some of the key changes introduced in the ITB 2025 and address crucial questions regarding its implementation.

1. Clause 263 – Delay in Filing of The Return by Even One (1) day would lead to non-grant of Refunds.

2. Clause 17 – Even in case, an employee is provided 'reimbursement' of expenses for To-Fro Journey from office-residence, it may be considered as tax free perquisite.

3. Clause 206 - For LLPs and Partnership Firms, for calculation of AMT @18.5%, there is no carve out for LTCG Income. Hence in case in an LLP claiming a deduction, there is an applicability of AMT and there is a LTCG Income also, then as per the ITB'25 at present, the AMT will apply even on LTCG @18.5% instead of Tax @12.5%.

4. Clause 200 read with Clause 148 – In case a Domestic Company had availed of the Taxation regime u/s 115BAA, then the benefit of deduction u/s 80M for intercorporate dividend was available to him. Now Section 80M is replaced by Clause 148 and Section 115BAA by Clause 200 and for the purpose of Clause 200 there is no carve out for Clause 148. Hence the benefit seems to have been gone.

Key Questions to be answered:

1. Would TDS Credits be carried forward under ITB'25 If so, how?
2. Would MAT/AMT Credits & losses be carried forward, If so, how?
3. What happens to APA Applications pending on 31st March 2026?
4. Exemptions granted/ Choices made in the earlier Act, will it be applicable in new Act?

5. What happens to assessments, re-assessments, etc. commencing after 1.4.26 but relating to AY26-27 or before?

6. ITA61 Jurisprudence applicable for ITB25?

7. Can 're-opening' be done on the basis of a judgement of a Court under ITB25 even in case similar matter is settled in ITA61?

8. What happens to refunds already sanctioned under ITA'61 – can they be adjusted against demands in ITB'25?

9. How would Block assessments which cover overlapping period, be done?

ITB'25 Implementation:

1. Do an impact analysis of ITB'25 implementation
2. Redo current computation as per ITB'25
3. Find out areas of exposures and mitigations to the exposures
4. File returns till FY 25-26 with ITB'25 in mind
5. File TDS returns for of FY 25-26 with ITB'25 in mind
6. Go Live – File New TDS/TCS returns in Q1 of TY 26-27
7. Pay Advance Tax for Q1 of TY 26-27 as per ITB'25
8. File ITR for TY 26-27 as per ITB'25

The ITB 2025 introduces several crucial amendments that will impact assessee significantly. While some provisions offer benefits, others increase tax liabilities and compliance requirements. Clear transition guidelines will be necessary to ensure a seamless shift from ITA 1961 to ITB 2025, and taxpayers must stay informed to adapt effectively to these changes. To ensure a smooth transition to the new tax regime, organizations should take necessary measures.

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

Editor:

Vivek Jalan

Partner - Tax Connect Advisory Services LLP

Co-Editor:

Rohit Sharma

Joint Partner – Tax Connect Advisory Services LLP

SYNOPSIS

S.NO.	TOPICS	PAGE NO.
1]	TAX CALENDER	4
2]	INCOME TAX	5-12
NOTIFICATION	U/S 138(1) OF IT ACT 1961 - SPECIFIED OFFICER, AUTHORITY OR BODY - DISCLOSURE OF INFORMATION RESPECTING ASSESSEES	
CIRCULAR	FREQUENTLY ASKED QUESTIONS (FAQS) ON GUIDELINES FOR COMPOUNDING OF OFFENCES UNDER THE INCOME-TAX ACT, 1961	
3]	GST	13-14
NOTIFICATION	SEEKS TO AMEND NOTIFICATION NO. 02/2017-CENTRAL TAX, DATED THE 19TH JUNE, 2017 - JURISDICTION OF CENTRAL TAX OFFICERS - CGST OFFICERS	
ADVISORY	BIOMETRIC-BASED AADHAAR AUTHENTICATION AND DOCUMENT VERIFICATION FOR GST REGISTRATION APPLICANTS OF UTTAR PRADESH	
4]	FEMA	15
CIRCULAR	ASIAN CLEARING UNION (ACU) MECHANISM – INDO-MALDIVES TRADE	
CASE LAW	DIRECTORATE OF ENFORCEMENT VERSUS P.C. FINANCIAL SERVICES PRIVATE LIMITED AND 3 OTHERS: TELANGANA HIGH COURT	
5]	CUSTOMS	16-21
NOTIFICATION	SEEKS TO IMPOSE PROVISIONAL ADD ON SOFT FERRITE CORES FROM CHINA PR	
NOTIFICATION	SEEKS TO IMPOSE ANTI-DUMPING DUTY ON VACUUM FLASKS FROM CHINA PR	
NOTIFICATION	SEEKS TO IMPOSE PROVISIONAL ADD ON ALUMINIUM FOIL UPTO 80 MICRONS, EXCLUDING ALUMINIUM FOIL BELOW 5.5 MICRON FOR NON-CAPACITOR APPLICATION FROM CHINA PR	
NOTIFICATION	CUSTOMS (ADMINISTRATION OF RULES OF ORIGIN UNDER TRADE AGREEMENTS) AMENDMENT RULES, 2025	
NOTIFICATION	SEEKS TO AMEND NOTIFICATION NO. 9/2012-CUSTOMS, DATED THE 9TH MARCH, 2012	
6]	DGFT	22
NOTIFICATION	EXTENSION OF RODTEP FOR ADVANCE AUTHORIZATIONS (AAS) HOLDERS, SPECIAL ECONOMIC ZONES (SEZS), AND EXPORT-ORIENTED UNITS (EOUS) UPTO 05.02.2025	
NOTIFICATION	AMENDMENT IN IMPORT POLICY CONDITION OF UREA [EXIM CODE 31021010] IN THE ITC (HS) 2022, SCHEDULE - I (IMPORT POLICY)	
PUBLIC NOTICE	EXTENSION OF THE LAST DATE FOR FILING ANNUAL RODTEP RETURN (ARR) FOR FINANCIAL YEAR 2023-24	
TRADE NOTICE	REVIEW THE SIONS PERTAINING TO AUTOMOBILE TYRES	
7]	INCOME TAX BILL 2025 WITH COMMENTARY	23
8]	UNION BUDGET – 2025 EDITION	24
9]	INCOME TAX SECTION-WISE COMMENTARY AND ANALYSIS OF RECENT DEVELOPMENTS	25
10]	UNION BUDGET – 2024 EDITION	26
11]	GST APPELLATE TRIBUNAL (GSTAT)	27
12]	GST PLEADING AND PRACTICE: WITH SECTION-WISE GST CASES & GST NOTICES AND THEIR	28
13]	HANDBOOK ON GST 2022	29
14]	TAX PLEADING AND PRACTICE JOURNAL	30
15]	HOW TO HANDLE GST LITIGATION: ASSESSMENT, SCRUTINY, AUDIT & APPEAL	31
16]	LET'S DISCUSS FURTHER	32

TAX CALENDAR

Date	Form/Return/Challan	Reporting Period	Description
23 rd March'2025 - 29 th March'2025	THERE ARE NO SIGNIFICANT DUE DATES FOR THIS WEEK	THERE ARE NO SIGNIFICANT DUE DATES FOR THIS WEEK	THERE ARE NO SIGNIFICANT DUE DATES FOR THIS WEEK

INCOME TAX

NOTIFICATION

U/S 138(1) OF IT ACT 1961 - SPECIFIED OFFICER, AUTHORITY OR BODY - DISCLOSURE OF INFORMATION RESPECTING ASSESSEES

OUR COMMENTS: The Central Board of Direct Taxes vide Notification No. 20/2025 dated 18.03.2025 notified that in pursuance of sub-clause (ii) of clause (a) of sub-section (1) of section 138 of the Income-tax Act, 1961, the Central Government hereby specifies 'Additional Chief Secretary (IT), Department of Information & Technology, Government of National Capital Territory of Delhi' for the purposes of the said clause in connection with sharing of information regarding Income-tax payers for identifying eligible beneficiaries under the social welfare schemes of Government of National Capital Territory of Delhi.

[For further details please refer the Notification]

CIRCULAR

FREQUENTLY ASKED QUESTIONS (FAQS) ON GUIDELINES FOR COMPOUNDING OF OFFENCES UNDER THE INCOME-TAX ACT, 1961

OUR COMMENTS: The Central Board of Direct Taxes vide Circular No. 04/2025 dated 17.03.2025 clarified that CBDT issued revised guidelines for Compounding of offences ('guidelines') under the Income-tax Act, 1961(the 'Act') on 17.10.2024. The revised guidelines superseded all existing guidelines on the subject and are applicable to pending as well as new applications, from the date of their issuance.

2. The revised guidelines have been simplified from previous guidelines, inter-alia, by eliminating categorization of offences, removing the limit on number of occasions for filing applications, allowing fresh application upon curing of defects, which was not permissible under earlier guidelines, allowing compounding of offences under section 275A and 276B of the Act, removing the existing time limit for filing application viz 36 months from the date of filing of complaint, etc.

3. For better awareness and understanding among the stakeholders with respect to the revised guidelines dated 17.10.2024, clarifications are provided by issue of a Circular in the form of answers to the frequently asked questions (FAQs) as follows:

A. Compounding of offence

Q. 1 What is compounding of offence?

Ans: Compounding of an offence is a mechanism whereby the defaulter is reprieved of major legal consequences by affording him an opportunity to pay certain sum of money to escape prosecution. The specified offences can be compounded by the competent authority either before or after the initiation of proceedings.

Q.2 Whether compounding of an offence constitute as an admission of an offence by the applicant?

Ans: No, compounding is intended to resolve the offence(s) and it is not to be construed as an admission of such offence(s) by the applicant. (Ref: para 9.11 of the guidelines)

Q.3 Are there any offence(s) under Income Tax Act which are not compoundable?

Ans: No, all offence under Income Tax Act have been made compoundable in revised guidelines dated 17.10.2024.

B. Competent authority/Jurisdiction

Q.4 Where can the compounding application be filed by the applicant?

Ans: The compounding application can be filed before the jurisdictional Pr. CCIT / CCIT / Pr. DGIT / DGIT, being the Competent Authority for compounding of offences. (Ref: para 8.1 of the guidelines)

Q.5 Who will be the competent authority where jurisdiction of the applicant lies with more than one jurisdiction charge for TDS related offences?

Ans: In such case, the Pr. CCIT/ CCIT/ Pr. DGIT/ DGIT in whose jurisdiction compounding application has been filed will be the Competent Authority. However, in case the applicant files applications in more than one jurisdictional charge, the Competent Authority will be the jurisdictional authority where the quantum of TDS default is higher. (Ref: para 8.2 of the guidelines)

Q.6 Who will be the competent authority where the applicant has more than one TAN and jurisdiction over these TANs lies with more than one jurisdiction charge?

Ans: In such case, the jurisdictional authority where the quantum of TDS default is higher, shall be the Competent Authority. (Ref: para 8.3 of the guidelines)

C. Compounding application and fee

INCOME TAX

Q.7 Whether any format and fees has been prescribed for an application for compounding?

Ans: The application for compounding must be filed in the format prescribed in Annexure-I to the revised guidelines. The application may include one or more offence(s) under different sections pertaining to one or multiple years/quarters. The application should be filed in the form of an affidavit on stamp paper of Rs. 100, along with application fees as per Para 4.2.1 of the revised guidelines dated 17.10.2024. (Ref: para 4.1.1 and 4.2.1 of the guidelines)

Q.8 Is there any time limit for filing of an application for compounding?

Ans: No, an application for compounding can be filed at any time after committing the offence, regardless of whether the same has come to the notice of the department or prosecution proceedings have been launched. (Ref: para 4.1.3 of the guidelines)

Q.9 Whether an applicant whose application was pending before issuance of revised guidelines required to deposit application fee as per para 4.2.1?

Ans: No application fees are payable for applications filed under earlier guidelines and pending on 17.10.2024. (Ref: para 4.2.4 of the guidelines)

Q.10 Whether compounding application fee is adjustable against compounding charge payable?

Ans: Yes, compounding fee is adjustable but only against compounding charges payable for the offence(s) sought to be compounded in the particular application. Cross application adjustment is not allowed. However, if compounding application is rejected for any reasons, the application fees shall neither be refundable nor adjustable against any subsequent application. (Ref: para 4.2.2 of the guidelines)

Q.11 Whether compounding is allowed if the application for such an offence was previously rejected? If so, whether separate applications need to be filed for more than one application rejected under the previous guidelines? How will the compounding application fees be charged?

Ans: Yes, an applicant may apply for compounding of offence(s) through a single consolidated application, if one or more applications had been rejected under previous guidelines. However, the fresh application can only be filed if such rejection(s) were on account of curable defects (illustrative

examples in para 3.2 of the revised guidelines) and no application is allowed to be filed for any of the rejection(s), made by the Competent Authority, on merits with those particulars i.e. offence and relevant financial year. Compounding application fees chargeable for a 'consolidated compounding application' would be charged in this case. (Ref: para 3.2 and 4.2.3 of the guidelines)

Q.12 Whether revised guidelines are applicable on pending compounding applications? If yes, whether applicants have to file a fresh application?

Ans: Yes, revised guidelines are applicable on the applications, pending before issuance of these guidelines. The applicants whose applications were pending on 17.10.2024 are not required to file a fresh application or pay any fresh application fees. (Ref: para 3.1 and 4.2.4 of the guidelines)

Q.13 Whether applicant can withdraw a compounding application and file a new application?

Ans: The applicant can file a new single application or consolidated application after withdrawal of earlier application(s). However, such new application shall be treated as a subsequent application and higher rate shall be applicable as per Para 10. (Ref: para 10.2 of the guidelines)

Q.14 Whether applicant is required to file compounding application for all the offences together, for which prosecution proceedings has been initiated?

Ans: No, the applicant may apply for one or multiple offences in an application. His application cannot be rejected on the ground that he has not applied for particular offence for which notice for prosecution has been issued and proceedings are under progress. (Ref: para 4.1.2 and 4.1.3 of the guidelines)

Q.15 Is there any limitation as to the number of times compounding applications can be filed by a person?

Ans: No, there is no limitation on the number of times a person can file compounding application. However, the Competent Authority may reject an application filed by a person on the ground of him being a 'habitual offender'. (Ref: para 7.1 and 7.2 of the guidelines)

Q.16 Whether the applicant whose application was rejected in earlier guidelines on the ground of being convicted is eligible to re-apply for compounding as per revised guidelines?

INCOME TAX

Ans: Yes, in case the rejection was solely on account of conviction, without examination of merits, as per any of the earlier guidelines, such applicant can reapply in terms of revised guidelines. (**Ref: para 6.1(a) and (b) of the guidelines**)

Q.17 Whether applicant can file a compounding application if his application is returned back due to defect(s)?

Ans: Yes, defective application can be revived by removing defects within a period of one month from date of intimation of defects(s). If defects are not cured within such time, the application will be returned back to the applicant and shall be deemed to be rejected. In such case, applicant may apply again which shall be treated as a subsequent compounding application for the purpose of determination of compounding charges. (**Ref: para 5 and 10 of the guidelines**)

Q.18 In terms of Para 10.7, what will be the date of applications in case of carried forwarded applications - original date of application or date of issue of new Guidelines?

Ans: The application pending as on 17.10.2024 shall be governed under new guidelines. However, date of such pending application shall be the original date of application for any purpose.

Q.19 Whether the applicant whose application was rejected on account of not being filed in time as provided for in the earlier guidelines, i.e. within expiry of 12/24/36 months from the end of the month of filing of complaint, is eligible to file fresh compounding application?

Ans: The limitation of 12/24/36 months has been eliminated in revised guidelines and all such applicants whose application were rejected earlier on limitation ground, may file fresh applications for compounding of offences, which shall be treated as subsequent application for the purpose of determination of compounding charges. (**Ref: para 3.2 and 10 of the guidelines**)

D. Terms for compounding

Q.20 Whether an applicant is required to withdraw appeal related to offence sought to be compounded before filing a compounding application?

Ans: No such withdrawal is required. However, applicants shall undertake to withdraw appeals including Writ petitions, if any, related to offences being compounded or grounds of appeal related to the offence to be compounded where appeal has mixed grounds. (**Ref: para 4.5 of the guidelines**)

Q.21 Whether an applicant who has filed a Writ Petition for rejection of his application being not filed within stipulated period of 12/24/36 months from filing of compliant as per earlier guidelines and is still to be decided by the Hon'ble Court, can again file a compounding application and how shall this application be treated?

Ans: Yes, after submission of an undertaking to withdraw the Writ Petition from the Hon'ble Court along with the application, the applicant can again file the compounding application, which shall be treated as a subsequent application for the purpose of determination of compounding charges. (**Ref: para 3.2, 4.5 and 10 of the guidelines**)

E. Approval of Higher Authority

Q.22 Whether offence can be compounded where applicant has been convicted for imprisonment for two years or more?

Ans: Yes, even if applicant has been convicted with imprisonment of two years or more for any offence under Income Tax Act or for an offence under any other law, which is related to offence under the Income Tax Act, may apply for compounding. Such offence shall, however, be compoundable only with the approval of Chairman, CBDT as per para 6.1 of revised guidelines. (**Ref: para 6.1(a) and (b) of the guidelines**)

Q.23 Whether cases involving other agencies such as ED /CBI can be compounded?

Ans: Yes, such offence(s) may be compounded by the competent authority if applicant is not found to be involved in anti-national or terrorist activity. However, if the applicant is found to be involved in such activity, the offence shall be compounded only with the approval of Chairman, CBDT, as per para 6.1(c) of the revised guidelines. (**Ref: para 6.1(c) of the guidelines**)

Q.24 If the main accused has more than one director/partner and one of these directors/partners file an application for compounding of offence(s), where it is found that the other director(s)/partner(s), who have not filed the compounding application, comes under the conditions as mentioned in Para 6.1 (d) (facilitated tax evasion through mechanisms such as use of entities for laundering of money, generation of bogus invoices of sale/purchase without actual business by accommodation entries or in any other manner) of these guidelines, whether approval of Higher Authority is required for deciding the compounding application?

Ans: If a case involves multiple offences and one of those offences requires approval from a higher authority under

INCOME TAX

paragraph 6.1 of the guidelines, the compounding application will be processed based on the offence for which the application has been filed, as explained below:

i. If the application has been filed by the main accused or one or more of the co-accused, for an offence that does not require approval from higher authority, such offence will be examined for compounding without the need for any approval, irrespective of the fact that any of co-accused(s) are also accused of any other offence(s) which require approval from higher authority (e.g., an offence under Section 277A) and they have not filed any compounding application for either of the offences.

ii. If the application has been filed for an offence, by the main accused or one or more of the co-accused, that requires approval from a higher authority (e.g., an offence under Section 277A), the offence will be compounded only with the approval of the higher authority. **(Ref: para 6.1(d) of the guidelines)**

F. Compounding charges

Q.25 How shall the compounding charges be calculated for the application(s) rejected under earlier guidelines and for which fresh allowable application has been filed?

Ans: All application(s) rejected under earlier guidelines shall be deemed to be the first compounding application. The fresh consolidated application will, accordingly, be considered as the second application and compounding charges will be calculated as per para 10 of the revised guidelines. Further details are discussed in question number 30. **(Ref: para 10 of the guidelines)**

Q.26 How shall the compounding charges be calculated for applications pending before issuance of these guidelines?

Ans: The compounding charges for pending application are subject to re-determination as per para 10 of the revised guidelines. All pending applications, whether for single or multiple years/quarters, shall be treated as first compounding application and compounding charge shall be re-computed for each offence disclosed in the application as given in Annexure-4 of the guideline. **(Ref: para 3.1 and 10 of the guidelines)**

Q.27 Whether credit of payment shall be allowed while re-computing compounding charge for pending applications? If yes, whether the excess payment shall be refundable or adjustable?

Ans: Yes, credit of the amount already paid for particular offence pertaining to particular year shall be allowed for such particular offence and year only, during re-computation of compounding charge for pending application. However, any excess payment

shall not be refundable or adjustable. **(Ref: para 3.1 of the guidelines)**

Q.28 If a new consolidated application includes a year for which application was filed earlier and then withdrawn, whether partial compounding charges paid for such year for which application is withdrawn can be adjusted against total compounding charges towards consolidated application?

Ans: No. Partial compounding charges paid for the year for which application is withdrawn can be adjusted in new consolidated application only towards the offence and particular year for which payment was made. **(Ref: para 3.2 of the guidelines)**

Q.29 An applicant has filed compounding applications under earlier guidelines, two of which were rejected on account of curable defects, two were compounded and three are pending as on issuance of this guideline. How should the applicant file a compounding application after issuance of these guidelines and how shall the new application be treated?

Ans: No action is pending for the applications which have been compounded. A consolidated application may be filed for all applications which were rejected (on account of curable defects) and no fresh application is required to be filed for pending applications. All pending applications, whether for single or multiple years/quarters, shall be treated as first compounding application and compounding charge shall be re-computed for each offence disclosed in the application as given in Annexure-4 of the guideline. The fresh consolidated application for rejected applications will be considered as second application. Accordingly, the application filed after issuance of these guidelines shall be treated as subsequent application (2nd application) and compounding charge shall be re-computed for each offence disclosed in the application, in terms of para 10 of the revised guidelines. **(Ref: para 3.1, 3.2 and 10 of the guidelines)**

Q.30 How the rate of compounding charges will be determined in subsequent application(s)?

Ans: The rate of compounding charge is based on sequence of application as well as offence applied for. If a subsequent application includes an offence which has also been included in earlier application(s), it shall be liable for higher rate i.e. 1.2 times, 1.4 times, 1.6 times and so on as per para 10.4 of the guidelines; irrespective of the fact that the offence and year of the offence are same in subsequent application and earlier application was rejected or pending or even compounded.

INCOME TAX

However, if subsequent application includes offence(s) which were not included in any compounding application filed earlier (rejected or compounded or pending) and the offence has been applied for first time, the compounding charge for such offence(s) shall be computed at normal rate as given in the annexure-4. (Ref: para 10 of the guidelines)

Illustration- An applicant has filed different applications on different dates to compound different offences which will be considered as below:

Scenario			Clarifications		
Application Date	Status	Offence (FY)	Sequence of Application	Offence included in Earlier Application?	Rate
15/01/2021	Compounded	276B (2012-13)	NA	NA	NA
17/10/2022	Compounded	276C (1) (2018-19)	NA	NA	NA
18/08/2023	Rejected	276B (2013-14)	NA	NA	NA
17/09/2024	Pending	276D (2019-20)	First (No fresh application required)	NA	Normal rate
01/11/2024 (filed under revised guidelines)	Single application for earlier application rejected)	276B (2013-14)	Second	Yes, in applications dated 15/01/2021 and 18/08/2023. (considered as 2nd time) *	1.2 times of normal rate
18/12/2024 (filed under revised)	Consolidated application	276B (2017-18)	Third	Yes, in applications dated 15/01/21 ,	1.4 times of normal rate

guidelines)			18/08/2023 & 01/11/2024 (3 rd time) #	
	276C (1) (2019-20)		Yes, in application dated 17/10/2022 (2nd time)	1.2 times of normal rate
	275A (2023-24)		No, first time applied for (1st time)	Normal rate

* It is noted that the applicant has opted for compounding for this offence for the third time in third application and accordingly compounding charges at 1.4 times of normal rate should apply. However, since both applications were filed under previous guidelines, all such applications will be cumulatively considered as 'first' application, in terms of Para 10.6 of the revised guidelines. Thus, offence under these applications will be considered as clubbed together for calculation of compounding charges.

It is noted that the applicant has opted for compounding for this offence for the fourth time in fourth application and accordingly compounding charges at 1.6 times of normal rate should apply. However, since first two applications were filed under previous guidelines, both these applications will be cumulatively considered as 'first' application, in terms of Para 10.6 of the revised guidelines, 01.11.2024 application will be considered as 'second' and this application will be considered as 'third'. Thus, offence under first two applications will be considered as clubbed together for calculation of compounding charges.

Q.31 Whether compounding application may be filed suo-moto? If yes, how the compounding charge shall be determined?

Ans: Yes, compounding application may be filed suo-moto at any time, after the offence(s) is committed, irrespective of whether it comes to the notice of department or not. The compounding charge depends on sequence of application as well as offence applied for and is independent of whether application is filed suo-moto or in compliance to the notice of department. (Ref: para 4.1.3 and 10 of the guidelines)

INCOME TAX

Q.32 Whether compounding application may be filed after launch of the prosecution? If yes, how the compounding charge will be determined?

Ans: Yes. If application is filed within 12 months from end of the month in which prosecution complaint is filed, the compounding charge will be determined as per para 10.2 to 10.5 of guidelines as illustrated in Question no. 30 above. For applications filed after 12 months, the compounding charge so calculated shall be increased by 50% as per para 10.7. **(Ref: para 10 of the guidelines)**

Illustration: Assessee had made TDS default of Rs 10,00,000/- for 3 months during FY 2019-20. The prosecution has been launched on 01/04/2022 u/s 276B of the Income Tax Act.

Scenario	Case	Date of Application	Time Elapsed	Rate	Compounding Charge
Scenario-1 (No earlier application ejected)	Case -1	12/10/2022 (Pending as of 17/10/2024)	Less than 12 months	Normal compounding charge as per Annexure-4	Rs 45,000/-
	Case -2	31/10/2024 (filed under revised guideline)	More than 12 months	Increase by 50% of normal compounding charge as per Annexure-4	Rs 67,500/- (1.5*Rs 45,000)
Scenario-2 First application ejected, revised application filed)	Case -3	12/10/2022 (Rejected)	Less than 12 months	NA (application rejected)	NA
		31/10/2024 (filed under revised guideline)	More than 12 months	1.2 times of normal compounding charge in by 50%	Rs 81,000/- {1.5* (1.2* Rs 45,000)}

Q.33 How to compute compounding charges for offence u/s 276CC in the absence of information on tax sought to be evaded or the tax on under-reported income due to assessment/reassessment being not carried out?

Ans: In such cases, compounding charges shall be the minimum compounding charge applicable for compounding of offence u/s 276CC as per Annexure-4 of the guideline. **(Ref: Annexure 4 of the guidelines)**

Q.34 Whether compounding charges include Prosecution Establishment Expenses and Litigation Expenses?

Ans: No. Such expense has been removed in revised guidelines.

Q.35 Is there any specific path for payment of compounding charge?

Ans: Yes, there is a path on e-filing website of the department and payment may be made by login through PAN or TAN. The path of the same is as under:

"Login on e-Filing portal → e-Pay Tax → New Payment → Income Tax → Minor Head → Other Receipts (500) → compounding charges". **(Ref: para 9.9 of the guidelines)**

Q.36 Whether the compounding charge can be made under PAN in case the applicant being a deductor?

Ans: The compounding charge shall be made under TAN of the deductor. However, if the applicant is the co-accused then compounding fees may be made under PAN of co-accused as the co-accused may not have access to the TAN of main accused.

"Login on e-Filing portal through TAN → e-Pay Tax → New Payment → Income Tax → Minor Head → Other Receipts (500) → compounding charges". **(Ref: para 9.9 of the guidelines)**

G. Extension of time (Compounding charges)

Q.37 Whether the time for payment of compounding charges may be extended?

Ans: Yes, up to a maximum period of 24 months, as per conditions mentioned in para 9.4 of the guidelines. **(Ref: para 9.4 of the guidelines)**

Q.38 Whether time for payment of compounding charges may be extended beyond 24 months?

INCOME TAX

Ans: No, beyond 24 months extension is not allowable and the application shall be rejected followed by initiation of prosecution proceedings, if not already initiated. However, the applicant can file new application for the same particulars which shall be treated as a subsequent application for the purpose of determination of compounding charges. **(Ref: para 9.4 and 10.3 of the guidelines)**

Q 39. As per the new guidelines, the payment period for compounding charges may be extended up to 24 months only from the end of the month in which the compounding charges were intimated. For pending applications where the payment initiation was made before the issuance of the revised guidelines but not fully paid, how will the period of 24 months be calculated? Additionally, will such applications require approval for extension under paragraph 9.4 of the guidelines?

Ans: For applications pending as on 17.10.2024, wherein compounding charges were not fully paid within time allowed as per earlier Guidelines or wherein time allowed had not elapsed, the period of 24 months will commence from the end of the month of issuance of these guidelines viz October 2024. The extension of timelines will require approval as prescribed in para 9.4 of the Guidelines. **(Ref: para 3.1 and 9.4 of the guidelines)**

Q.40 Are extension for payment of compounding charges subject to interest or additional charges?

Ans: No, interest or additional charges are not applicable on extension allowable under para 9.4 of the guidelines. Further, for cases pending as on date of issuance of revised guidelines, additional compounding charge (chargeable under previous guidelines) shall not be applicable and compounding charge shall be determined as per Para 10 of the guidelines. **(Ref: para 9.4 and 10 of the guidelines)**

H. Co -accused and abettors-offence by Companies and HUF

Q.41 Whether co-accused can file compounding application under revised guideline?

Ans: Yes, co-accused may apply for compounding of offence separately or jointly. **(Ref: para 11 of the guidelines)**

Q.42 Where the compounding application of the co-accused was rejected earlier on the ground that the main accused has not filed for compounding, whether such applicants will be eligible for filing again? If yes, whether such application shall be a subsequent application?

Ans: Yes, other than the case where application was rejected in past on merit, any of the co-accused applicant is eligible to file compounding application again separately or conjointly. Such application shall be treated as a subsequent application for the purpose of determination of compounding charges. **(Ref: para 3.2, 11 and 10 of the guidelines)**

Q.43 Similarly, where the compounding application of the main accused was rejected earlier on the ground that the co-accused has not filed for compounding or given undertaking, whether such applicants will be eligible for filing again? If yes, whether such application shall be a subsequent application?

Ans: Yes, other than the case where application was rejected in past on merit, the main accused applicant is eligible to file compounding application again separately or conjointly with the co-accused. Such application shall be a subsequent application for the purpose of determination of compounding charges. **(Ref: para 3.2, 11 and 10 of the guidelines)**

Q.44 If any application filed by co-accused or accused under previous guidelines is pending, whether they are required to file a fresh application under revised guidelines?

Ans: No. All such pending applications will be clubbed together and none of the applicants (main accused and/or co-accused) are required to file a fresh application under revised guidelines. This consolidated application shall be considered as first application for the purpose of determination of compounding charges. **(Ref: para 4.2.4, 11 and 10 of the guidelines)**

Q.45 If application is filed by main accused or co-accused or by both of them co-jointly, whether separate compounding fee shall be applicable for co-accused or not?

Ans: No separate compounding fee for co-accused shall be payable, irrespective of the fact that application has been filed by main accused or co-accused or by both of them co-jointly. Only compounding charge(s) for the concerned offence(s) shall be payable, as per para 10 of the revised guidelines. Once such payment is made by the applicant being main accused or co-accused or both of them conjointly, the Competent Authority shall compound concerned offences for main accused as well as all the co-accused. **(Ref: para 11 and 10 of the guidelines)**

Q.46 Whether any person other than main accused or co-accused can file compounding application for compounding of an offence of company or HUF?

Ans: No, person other than main accused or co-accused cannot file compounding application. The applicant is required to

INCOME TAX

disclose his status as main accused or co-accused in the serial no. 4 of compounding application (Annexure-I of revised guidelines). **(Ref: para 11 and Annexure -1 of the guidelines)**

Q.47 What will happen if co-accused has not been identified by the department for offences u/s 278B?

Ans: In cases where co-accused have not been identified or such identification is under progress u/s 278B of the Income Tax Act, either the main accused or any person who can substantiate along with supporting documents that he was in-charge or responsible for conduct of the business of the company during the time of commission of offence, to be considered as 'deemed to be guilty' u/s 278B(1), can file an application as co-accused. **(Ref: para 11 of the guidelines)**

Q.48 If any person filed a compounding application as a co-accused in the scenario given at Q. No. 46, whether there is any requirement to identify other co-accused?

Ans: In such cases there will be no requirement to identify other co-accused for the purpose of the compounding of the offence. However, if such compounding application is rejected for any reason, all co-accused shall need to be identified as per Section 278B of the Income Tax Act to file prosecution complaint before the concerned Court. **(Ref: para 11 and 10 of the guidelines)**

Q.49 Can co-accused furnish an undertaking for withdrawal of appeals as required in para 4.5 of the guidelines, on behalf of the main accused?

Ans: No, co-accused cannot furnish undertaking for withdrawal of appeal on behalf of the main accused. Such undertaking shall be furnished by the main accused only which must be attached with the application if application has been filed by the co-accused, since offences of both main accused and co-accused are being compounded, under para 11.2 of the revised guidelines. **(Ref: para 11 of the guidelines)**

Q.50 If application has been filed by only main accused or co-accused, in such case against whom name the compounding order shall be passed?

Ans: The compounding order ws 279(2) shall be passed in the name of person(s) who have applied for compounding. If co-accused has applied, then order shall include the name of main accused also. Further, in a case where main accused has applied and co-accused has been identified, the order shall be passed in the name of main accused and co-accused. **(Ref: Annexure-1 and 3 of the guidelines)**

Q.51 Whether co-accused can file compounding application where the liability of main accused company ceases under Insolvency Bankruptcy Code?

Ans: The liability of co-accused does not extinguish even if the liability of main accused company ceases. The co-accused may file compounding application in such cases, either separately or jointly and payment of compounding charge can be made by co-accused or the main accused company. **(Ref: para 11.4 of the guidelines)**

Q.52 The assessee company/main accused is under NCLT/CIRP/Liquidation and either there is moratorium due to the provisions of section 14 or liquidation process has been initiated against the company due to the provisions of section 33 of the Insolvency Bankruptcy Code('IBC'). In such conditions, whether Para 4.3 of the guidelines (regarding payment of all taxes, interest and other sums) will be applicable or not?

Ans: The conditions prescribed in paragraph 4.3 of the Guidelines will apply, as explained below:

Case 1: During the Moratorium Period: The demand due from the main accused is not extinguished during the moratorium period. If a co-accused files an application for compounding during the moratorium period, paragraph 4.3 of the guidelines will apply.

Case 2: After Rejection of the Resolution Plan (Liquidation Proceedings): Upon rejection of the resolution plan, liquidation proceedings commence under Section 33 of IBC. The pending demand becomes a valid claim before the liquidator. If a co-accused files an application for compounding after rejection of the resolution plan, paragraph 4.3 of the guidelines will apply.

Case 3: After Approval of the Resolution Plan: Once the resolution plan is approved under Section 31 of the IBC, the main accused company is absolved Of the offence, provided there is change in the management in terms of conditions prescribed in section 32A of the IBC. The co-accused(s), however, continue to be liable for the offence. If a co-accused files an application for compounding after approval of the resolution plan, paragraph 4.3 of the guidelines will apply.

[For further details please refer the Circular]

GST

NOTIFICATION

SEEKS TO AMEND NOTIFICATION NO. 02/2017-CENTRAL TAX, DATED THE 19TH JUNE, 2017 - JURISDICTION OF CENTRAL TAX OFFICERS - CGST OFFICERS

OUR COMMENTS: The Central Board of Indirect Taxes and Customs, Department of Revenue, Ministry of Finance vide Notification No. 10/2025 – dated 13.03.2025 notified that in exercise of the powers conferred by section 3 read with section 5 of the Central Goods and Services Tax Act, 2017 (12 of 2017) and section 3 of the Integrated Goods and Services Tax Act, 2017 (13 of 2017), the Central Government, hereby makes the following further amendments in the notification of the Government of India, in the Ministry of Finance (Department of Revenue), No. 02/2017-Central Tax, published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i), vide number G.S.R. 609(E), dated the 19th June, 2017, namely: -

In the said notification, in Table, -

(i) for serial number 7 and the entries relating thereto, the following shall be substituted, namely: -

"7.	Alwar	Districts of Alwar, Khairthal-Tijara, Kotputli-Behror, Bharatpur, Deeg, Dholpur, Dausa, Karauli, Sawaimadhopur, Sikar and Jhunjhunu in the state of Rajasthan.";
-----	-------	--

(ii) for serial number 23, and the entries relating thereto, the following shall be substituted, namely: -

"23.	Chennai Outer	Districts of Viluppuram, Kallakurichi, Thiruvannamalai, Vellore, Tirupathur, Ranipet, Tiruvallur, Kanchipuram, Chengalpattu and areas covered under Pallavaram Cantonment Board excluding Chennai Corporation Zone Nos. I to XV (from Ward No. 1 to 200 in existence as on 01.04.2017) and St. Thomas Mount Cantonment Board in the State of Tamil Nadu";
------	---------------	---

(iii) for serial number 49 and the entries relating thereto, the following shall be substituted, namely: -

"49.	Jaipur	Districts of Jaipur, Ajmer, Beawer and Tonk in the state of Rajasthan.";
------	--------	--

(iv) for serial number 53 and the entries relating thereto, the following shall be substituted, namely: -

"53.	Jodhpur	Districts of Jodhpur, Phalodi, Nagaur, Didwana-Kuchaman, Pali, Sirohi, Jalore, Barmer, Balotra, Jaisalmer, Bikaner, Churu, Ganganagar and Hanumangarh in the state of Rajasthan.";
------	---------	--

(v) for serial number 63, and the entries relating thereto, the following shall be substituted, namely: -

"63.	Madurai	Districts of Madurai, Ramanathapuram, Sivagangai, Virudhunagar, Tuticorin, Tirunelveli, Tenkasi, Kanyakumari, Theni, Dindigul (except D. Gudalur Village of Palayam Firka of Veda sandur Taluk) in the State of Tamil Nadu. The territorial waters and the seabed and sub soil underlying such waters from where the nearest point of the appropriate baseline is located in the state of Tamil Nadu and the Union territory of Puducherry.";
------	---------	--

(vi) for serial number 100 and the entries relating thereto, the following shall be substituted, namely: -

"100.	Tiruchirappalli	Districts of Tiruchirappalli, Perambalur, Ariyalur, Karur, Pudukottai, Thanjavur, Thiruvarur, Nagapattinam, Mayiladuthurai, Cuddalore, and D. Gudalur village of Palayam Firka of Veda sandur Taluk of Dindigul District in the State of Tamil Nadu.";
-------	-----------------	--

(vii) for serial number 102 and the entries relating thereto, the following shall be substituted, namely: -

"102.	Udaipur	Districts of Udaipur, Salumbar, Rajsamand, Bhilwara, Chittorgarh, Pratapgarh, Dungarpur, Banswara, Bundi, Baran, Kota and Jhalawar in the state of Rajasthan.";
-------	---------	---

[For further details please refer the Notification]

ADVISORY

BIOMETRIC-BASED AADHAAR AUTHENTICATION AND DOCUMENT VERIFICATION FOR GST REGISTRATION APPLICANTS OF UTTAR PRADESH

OUR COMMENTS: GSTN vide advisory dated 16.03.2025 has advised that this is to inform taxpayers about recent developments concerning the application process for GST

GST

registration. It is advised to keep the following key points in mind during the registration process.

1. Rule 8 of the CGST Rules, 2017 has been amended to provide that an applicant can be identified on the common portal, based on data analysis and risk parameters for Biometric-based Aadhaar Authentication and taking a photograph of the applicant along with the verification of the original copy of the documents uploaded with the application.

2. The above-said functionality has been developed by GSTN. It has been rolled out in Uttar Pradesh on 15th March, 2025.

3. The said functionality also provides for the document verification and appointment booking process. After the submission of the application in Form GST REG-01, the applicant will receive either of the following links in the e-mail,

(a) A Link for OTP-based Aadhaar Authentication OR

(b) A link for booking an appointment with a message to visit a GST Suvidha Kendra (GSK) along with the details of the GSK and jurisdiction, for Biometric-based Aadhaar Authentication and document verification (the intimation e-mail)

4. If the applicant receives the link for OTP-based Aadhaar Authentication as mentioned in point 3(a), she/he can proceed with the application as per the existing process.

5. However, if the applicant receives the link as mentioned in point 3(b), she/he will be required to book the appointment to visit the designated GSK, using the link provided in the e-mail.

6. The feature of booking an appointment to visit a designated GSK is being enabled for the applicants of Uttar Pradesh and the applicants can book slots from 18/03/2025.

7. After booking the appointment, the applicant gets the confirmation of appointment through e-mail (the appointment confirmation e-mail), she/he will be able to visit the designated GSK as per the chosen schedule.

8. At the time of the visit of GSK, the applicant is required to carry the following details/documents

(a) a copy (hard/soft) of the appointment confirmation e-mail

(b) the details of jurisdiction as mentioned in the intimation e-mail

(c) Aadhaar Card and PAN Card (Original Copies)

(d) the original documents that were uploaded with the application, as communicated by the intimation e-mail.

9. The biometric authentication and document verification will be done at the GSK, for all the required individuals as per the GST application Form REG-01.

10. The applicant is required to choose an appointment for the biometric verification during the maximum permissible period for the application as indicated in the intimation e-mail. In such cases, ARNs will be generated once the Biometric-based Aadhaar Authentication process and document verification are completed.

11. The operation days and hours of GSKs will be as per the guidelines provided by the administration in your state.

[For further details please refer the detailed advisory]

FEMA

CIRCULAR

ASIAN CLEARING UNION (ACU) MECHANISM – INDO-MALDIVES TRADE

OUR COMMENTS: The Reserve Bank of India vide circular No.22 dated 17.03.2025 clarified that attention of Authorised Dealer Category – I (AD Category-I) banks is invited to Sub-clause (a)(ii) of Clause (I) of Sub regulation 2 of Regulations 3 of Foreign Exchange Management (Manner of Receipt and Payment) Regulations, 2023 in terms of which trade transactions between ACU member countries are to be routed through the ACU mechanism or as per the directions issued by the Reserve Bank of India.

2. In the wake of signing of Memorandum of Understanding (MoU) between RBI and Maldives Monetary Authority in November 2024 for establishing a framework to promote the use of local currencies i.e., Indian Rupee (INR) and Maldivian Rufiyaa (MVR) for bilateral transactions, it has been decided that India's bilateral trade transactions with Maldives may also be settled in INR and/or MVR in addition to the ACU mechanism, as hitherto.

3. The above instructions shall come into force with immediate effect. AD Category-I banks may bring the contents of this circular to the notice of their constituents concerned.

4. The directions contained in this circular have been issued under sections 10(4) and 11(1) of the Foreign Exchange Management Act (FEMA), 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]

CASE LAW

DIRECTORATE OF ENFORCEMENT VERSUS P.C. FINANCIAL SERVICES PRIVATE LIMITED AND 3 OTHERS: TELANGANA HIGH COURT

OUR COMMENTS: In the instant case Legality and validity of the seizure orders. It has been held that the facts of the case reveal that before the learned Single Judge, though a prayer for quashment of seizure orders dated 26.08.2021, 30.09.2021 and 15.12.2021 was made, an interlocutory application was preferred for release of ₹ 15,35,45,317/- and the learned Single Judge has allowed the application. The writ petition itself has been disposed of by the impugned order dated 11.02.2022.

In the considered opinion of this Court, once the seizure orders were not set aside and no statutory provision was brought to the notice of the learned Single Judge for release of such

amount and the seizure orders have been affirmed by the competent authority under Section 37A (2) of the Act, no such provisional release could have been ordered by disposing of the writ petition itself.

Learned counsel for the Union of India has also brought to the notice of this Court the press release issued by the Reserve Bank of India dated 24.02.2022 and the same reflects that even the banking licence of the respondent No.1/writ petitioner has been cancelled.

However, as this Court is not dealing with the cancellation of licence, no comment has been offered in respect of such cancellation. Learned counsel for the respondent No.1/writ petitioner has stated that he does not have a copy of the aforesaid order and he is not aware of the same.

Section 37A of the Act provides for a remedy of appeal and therefore, as now an order dated 04.02.2022 is in existence, the respondent No.1/writ petitioner shall certainly be free to prefer an appeal or to avail the other remedies available under the law. Resultantly, the order passed by the learned Single Judge is set aside and the writ appeal stands allowed.

CUSTOMS

NOTIFICATION

SEEKS TO IMPOSE PROVISIONAL ADD ON SOFT FERRITE CORES FROM CHINA PR

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Notification No. 04/2025-Customs(ADD) dated 18.03.2025 notified that Whereas in the matter of 'Soft Ferrite Cores' (hereinafter referred to as the subject good) falling under tariff item 8505 11 10 of the First Schedule to the Customs Tariff Act, 1975 (51 of 1975) (hereinafter referred to as the Customs Tariff Act), originating in, or exported from China PR (hereinafter referred to as the subject country), and imported into India, the designated authority in its final findings, issued vide notification No. 6/22/2023-DGTR, dated the 23rd December, 2024, published in the Gazette of India, Extraordinary, Part I, Section 1, dated the 23rd December, 2024, has inter-alia come to the conclusion that—

(i) the subject good has been exported to India from the subject country at dumped prices;

(ii) the domestic industry has suffered material injury on account of subject import from subject country;

(iii) the material injury has been caused by the dumped imports of subject good from the subject country,

and has recommended imposition of an anti-dumping duty on the imports of subject goods, originating in, or exported from the subject country and imported into India, in order to remove injury to the domestic industry.

Now, therefore, in exercise of the powers conferred by sub-sections (1) and (5) of section 9A of the Customs Tariff Act read with rules 18 and 20 of the Customs Tariff (Identification, Assessment and Collection of Antidumping Duty on Dumped Articles and for Determination of Injury) Rules, 1995, the Central Government, after considering the aforesaid final findings of the designated authority, hereby imposes on the subject good, the description of which is specified in column (3) of the Table below, falling under tariff item of the First Schedule to the Customs Tariff Act as specified in the corresponding entry in column (2), originating in the country as specified in the corresponding entry in column (4), exported from the countries as specified in the corresponding entry in column (5), produced by the producers as specified in the corresponding entry in column (6), and imported into India, an antidumping duty at the rate as specified in the corresponding entry in column (7) of the said Table, namely:-

TABLE

S. No.	Tariff Item	Description of Goods	Country of Origin	Country of Export	Producer	Duty as % of CIF
(1)	(2)	(3)	(4)	(5)	(6)	(7)
1	8505 11 10	Soft Ferrite Cores*	China PR	Any country including China PR	Huzhou Haotong Electronic Technology Co., Ltd. (producer)	31
2	-do-	-do-	China PR	Any country including China PR	Yibin Jinchuan Electronics Co., Ltd. and Hengdian Group DMEGC Magnetics Co., Ltd.	Nil
3	-do-	-do-	China PR	Any country including China PR	Any, other than S. No. 1 to 2	35
4	-do-	-do-	Any country including China PR	China PR	Any	35

*The product under consideration in the present investigation is limited to Manganese-Zinc-based Soft Ferrite Cores of the following geometries and lengths:

- a) EE/E/EF of length 10 mm to 128 mm
- b) PQ/EQ of length 20 mm to 71 mm
- c) ET of length 24 mm to 35 mm

CUSTOMS

d) Toroid (with and without coating) of length 03 mm to 202 mm

e) UU/UI of length 10 mm to 141 mm

f) I Bars of length 20 mm to 245 mm

g) ER of length 11 mm to 67 mm

2. The anti-dumping duty imposed under this notification shall be effective for a period of five years (unless revoked, superseded or amended earlier) from the date of publication of this notification in the Official Gazette, and shall be payable in Indian currency.

Explanation. – For the purposes of this notification,

(a) rate of exchange applicable for the purposes of calculation of such anti-dumping duty shall be the rate which is specified in the notification of the Government of India, in the Ministry of Finance (Department of Revenue), issued from time to time, in exercise of the powers conferred by section 14 of the Customs Act, 1962 (52 of 1962), and the relevant date for the determination of the rate of exchange shall be the date of presentation of the bill of entry under section 46 of the said Act.

(b) "CIF value" means assessable value as determined under section 14 of the Customs Act, 1962 (52 of 1962).

[For further details please refer the Notification]

NOTIFICATION

SEEKS TO IMPOSE ANTI-DUMPING DUTY ON VACUUM FLASKS FROM CHINA PR

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Notification No. 03/2025-Customs (ADD) dated 17.03.2025 notified that whereas, in the matter of "vacuum insulated flask and other vacuum vessels, of stainless steel" (hereinafter referred to as the subject goods), falling under tariff items 9617 00 11, 9617 00 12, 9617 00 90 of the First Schedule to the Customs Tariff Act, 1975 (51 of 1975) (hereinafter referred to as the Customs Tariff Act), originating in, or exported from China PR (hereinafter referred to as the subject country) and imported into India, the designated authority in its final findings vide notification No. 06/10/2023-DGTR, published in the Gazette of India, Extraordinary, Part I, Section 1, dated the 19th December, 2024, has, inter alia, come to the conclusion that -

i. the product under consideration has been exported to India at a price below normal value, thus resulting in dumping;

ii. the dumping of the subject goods has resulted in material injury to the domestic industry in India;

iii. the landed price of imports is below the level of selling price of the domestic industry and is undercutting the prices of the domestic industry,

and has recommended imposition of anti-dumping duty on imports of the subject goods, originating in, or exported from the subject country and imported into India, in order to remove injury to the domestic industry.

Now, therefore, in exercise of the powers conferred by sub-sections (1) and (5) of section 9A of the Customs Tariff Act read with rules 18 and 20 of the Customs Tariff (Identification, Assessment and Collection of Antidumping Duty on Dumped Articles and for Determination of Injury) Rules, 1995, the Central Government, after considering the aforesaid final findings of the designated authority, hereby imposes on the subject goods, the description of which is specified in column (3) of the Table below, falling under the tariff item of the First Schedule to the Customs Tariff Act as specified in the corresponding entry in column (2), originating in the country as specified in the corresponding entry in column (4), exported from the countries as specified in the corresponding entry in column (5), produced by the producers as specified in the corresponding entry in column (6), and imported into India, an antidumping duty at the rate equal to the amount as specified in the corresponding entry in column (7), in the currency as specified in the corresponding entry in column (9) and as per unit of measurement as specified in the corresponding entry in column (8) of the said Table, namely :-

TABLE

Sl. No.	Headin g/ Sub-headin g/ Tariff item	Descriptio n of Goods	Count ry of Origin	Countr y of Export	Produc er	Amou nt	Uo M	Curren cy
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
1	9617 00 11,	Vacuum insulated fl ask and	China PR	Any	Any	1,732	MT	USD

CUSTOMS

9617 00 12,	other vacuum vessels, of stainless steel*		including				
9617 00 90			China PR				

*“Vacuum insulated flask and other vacuum insulated vessels, of stainless steel” such as vacuum insulated cups/ mugs, bottles/ flasks, and carafes/ kettles including vacuum-insulated body of flask and other vacuum-insulated vessels. Vessels and containers like dispensers, casseroles, vacuum lunch boxes/ tiffin, ice buckets and boxes, etc. fall outside the scope of the product under consideration. Further, single walled flask i.e., a flask with no vacuum, electric kettles and other electric vessels are excluded from the scope of the PUC.

2. The anti-dumping duty imposed under this notification shall be levied for a period of five years (unless revoked, superseded or amended earlier) from the date of publication of this notification in the Official Gazette and shall be payable in Indian currency.

Explanation.- For the purposes of this notification, rate of exchange applicable for the purpose of calculation of such anti-dumping duty shall be the rate which is specified in the notification of the Government of India, in the Ministry of Finance (Department of Revenue), issued from time to time, in exercise of the powers conferred by section 14 of the Customs Act, 1962 (52 of 1962), and the relevant date for the determination of the rate of exchange shall be the date of presentation of the bill of entry under section 46 of the said Customs Act.

[For further details please refer the Notification]

NOTIFICATION
SEEKS TO IMPOSE PROVISIONAL ADD ON ALUMINIUM FOIL UPTO 80 MICRONS, EXCLUDING ALUMINIUM FOIL BELOW 5.5 MICRON FOR NON-CAPACITOR APPLICATION FROM CHINA PR

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Notification No. 02/2025-Customs (ADD) dated 17.03.2025 notified that whereas, in the matter of “Aluminium foil upto 80 micron, excluding aluminium foil below 5.5 micron for non-capacitor application” (hereinafter referred to as the subject goods) falling under tariff items 7607 11 10, 7607 11 90, 7607 19 10, 7607 19 91, 7607 19 92, 7607 19 93, 7607 19 94, 7607 19 95, 7607 19 99, 7607 20 10 or 7607 20 90 of the First Schedule to the Customs Tariff Act, 1975 (51 of 1975) (hereinafter referred to as the Customs Tariff Act), originating in or exported from China PR (hereinafter referred

to as the subject country) and imported into India, the designated authority in its preliminary findings issued vide notification No. 6/35/2023-DGTR, published in the Gazette of India, Extraordinary, Part I, Section 1, dated the 28th August, 2024, read with Corrigendum dated 11th February, 2025 has provisionally concluded that-

(i) the subject goods have been exported to India from the subject country at a price below the normal value, resulting in dumping;

(ii) the domestic industry has suffered material injury;

(iii) material injury has been caused by the dumped imports of the subject goods from the subject country,

and has recommended imposition of provisional anti-dumping duty on imports of the subject goods, originating in, or exported from the subject country and imported into India, in order to remove injury to the domestic industry.

Now, therefore, in exercise of the powers conferred by sub-section (2) of section 9A of the Customs Tariff Act read with rules 13 and 20 of the Customs Tariff (Identification, Assessment and Collection of Anti-dumping Duty on Dumped Articles and for Determination of Injury) Rules, 1995, the Central Government, on the basis of the aforesaid preliminary findings of the designated authority, hereby imposes on the subject goods, the description of which is specified in column (3) of the following Table, falling under tariff items of the First Schedule to the Customs Tariff Act as specified in the corresponding entry in column (2), originating in the countries as specified in the corresponding entry in column (4), exported from the countries as specified in the corresponding entry in column (5), produced by the producers as specified in the corresponding entry in column (6), and imported into India, a provisional anti-dumping duty equal to the amount indicated in the corresponding entry in column (7), in the currency as specified in the corresponding entry in column (9) and as per unit of measurement as specified in the corresponding entry in column (8) of the said Table, namely:-

TABLE

S. N.	Tariff Items	Description of goods	Country of origin	Country of export	Producer	Amount	Unit of measurement (MT)	Currency (USD)
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)

CUSTOMS

1.	76071110, 76071190, 76071910, 76071992, 76071993, 76071994, 76071995, 76071999, 76072010 or	Aluminium foil upto 80 microns, excluding aluminium foil below 5.5 micron for non-capacitor application ** Excluding the following	China PR	Any Country including China PR	Henan Mingtai technology development Co. Ltd. Henan Mingsheng New Material Technology Co. Ltd.	653	MT	USD
----	---	---	----------	--------------------------------	---	-----	----	-----

	76072090*							
2	do	do	China PR	Any Country including China PR	Sunho New Materials Technology Co. Ltd. Shanghai Sunho Aluminium Foil Co. Ltd.	619	MT	USD
3	do	do	China PR	Any Country including China PR	Jiangsu Dingsheng New Materials Joint-Stock Co. Ltd. Inner Mongolia Lian Shen New Energy Co. Ltd. Hangzhou Five Star Aluminium Co. Ltd.	632	MT	USD
4	do	do	China PR	Any	***Non-		MT	USD

CUSTOMS

				Country including China PR	Sampled Cooperative Producers	633		
5	do	do	China PR	Any Country other than Subject country	Any Producer other than SN 1,2, 3 & 4	873	MT	USD
6	do	do	Any Country other than Subject country	China PR	Any	873	MT	USD

***Note**-Customs classification is only indicative, and the determination of anti-dumping duty shall be made as per the description of the PUC.

****** Excluding the following-

a. Aluminium foil below 5.5-micron gauge for non-capacitors applications;

b. Aluminium foil for capacitors below 5 microns, upwards of 5 micron and up to 5.5 microns. It is however clarified that aluminium foil of 5-micron gauge of width below 500mm having 99.35% purity for capacitors and aluminium foil from 5.5 microns to 80 microns for capacitors is included in the scope of the PUC;

c. Ultra-Light Gauge converted foil meant for use in insulation, spices packing' thermal fluid lines covering and tea bags application - Ultra Light Gauge converted foil is an aluminium foil having thickness of 5.5 micron to 7 micron which is backed with kraft paper and scrim, or glass cloth, whether plain or printed for use in insulation, spices packing, thermal fluid lines covering and tea bags application;

d. Etched or formed aluminium foils meant for electrolytic capacitor - Etched or formed aluminium foils is aluminium foil meant to be used in the manufacture of Electrolytic Capacitor

e. Aluminium composite panel meant for facade cladding and signage applications – Aluminium composite panel is a non-aluminium core (often PE) bonded between two thin layers of aluminium, for use in facade cladding and signage.

f. Clad with compatible non clad aluminium foil - Clad with compatible non clad aluminium foil is a corrosion-resistant aluminium sheet formed from aluminium surface layers metallurgically bonded to high-strength aluminium alloy core material for use in engine cooling and air conditioner systems in automotive industry and industrial applications; such as radiator, condenser, evaporator, intercooler, oil cooler and heater.

g. Aluminium foil for beer bottle - aluminium foil of 10.5 micron with rough surface and perforated whether printed or not; to be used in beer bottle.

h. Aluminium- manganese- silicon based and/ or clad aluminium- manganese silicon-based alloys, whether clad or unclad- with post brazing yield strength greater than 35 MPA, falling under tariff heading 7607 and 7606, for use in heat exchangers including radiators, charge air coolers, condensers, oil coolers, heater cores, evaporators, heat ventilation and air conditioning (HVAC) systems and parts thereof.

i. Adhesive tapes

j. Colour coated aluminium foil-either one side or both sides, irrespective of colour, shape or coating.

k. Polyurethane coated aluminium foil- either one side or both sides, irrespective of colour, shape, or coating.

*****List of Non-Sampled Cooperative Producers**

1) Shandong Deli Aluminium Technology Co. Ltd

2) Jiangsu Zhongji Lamination Materials Co., Ltd.

3) Luoyang Longding Aluminium Industries Co. Ltd.

4) Xiamen Xiashun Aluminium Foil Co. Ltd.

5) Jiangsu Fengyuan Aluminum Mstar Technology Co., Ltd.

6) Luoyang Wanji Aluminium Processing Co. Ltd.

7) Kunshan Aluminium Co. Ltd.,

2. The provisional anti-dumping duty imposed under this notification shall be effective for a period of six months (unless

CUSTOMS

revoked, amended or superseded earlier) from the date of publication of this notification in the Official Gazette and shall be payable in Indian currency.

Explanation- For the purposes of this notification, rate of exchange applicable for the purposes of calculation of the anti-dumping duty shall be the rate which is specified in the notification of the Government of India, in the Ministry of Finance (Department of Revenue), issued from time to time, in exercise of the powers conferred by section 14 of the Customs Act, 1962 (52 of 1962), and the relevant date for the determination of the rate of exchange shall be the date of presentation of the bill of entry under section 46 of the said Customs Act.

[For further details please refer the Notification]

NOTIFICATION

CUSTOMS (ADMINISTRATION OF RULES OF ORIGIN UNDER TRADE AGREEMENTS) AMENDMENT RULES, 2025

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Notification No. 14/2025-Customs (N.T.) dated 18.03.2025 notified that in exercise of the powers conferred by sub-section (1) of section 156 read with section 28DA of the Customs Act, 1962, the Central Government, on being satisfied that it is necessary in the public interest so to do, hereby amend the Customs (Administration of Rules of Origin under Trade Agreements) Rules, 2020, namely :-

1. (1) These rules may be called the Customs (Administration of Rules of Origin under Trade Agreements) Amendment Rules, 2025.

(2) They shall come into force on the date of their publication in the Official Gazette.

2. In the Customs (Administration of Rules of Origin under Trade Agreements) Rules, 2020, -

(a) in rule 2, in sub-rule (1), in clause (f), for the word "certificate", the word "proof" shall be substituted;

(b) in rule 3, —

(i) in sub-rule (1), —

(A) in clauses (c) and (d), for the word "certificate", the word "proof" shall be substituted;

(B) in clause (d), in sub-clauses (i), (ii) and (v), for the word "certificate", the word "proof" shall be substituted;

(ii) in sub-rule (2), for the word "certificate", the word "proof" shall be substituted;

(c) in rule 6, -

(i) in sub-rule (1), for the word "certificate", the word "proof" shall be substituted;

(ii) in sub-rule (1), in clauses (a) and (b), for the word "certificate", the word "proof" shall be substituted;"

3. In Form I, in Section III, in Part B, in paragraph 2, at serial number g, for the letters "CoO", the words "proof of origin" shall be substituted.

[For further details please refer the Notification]

NOTIFICATION

SEEKS TO AMEND NOTIFICATION NO. 9/2012-CUSTOMS, DATED THE 9TH MARCH, 2012

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Notification No. 18/2025-Customs (Tariff) dated 20.03.2025 notified that in exercise of the powers conferred by sub-section (1) of section 25 of the Customs Act, 1962 (52 of 1962), the Central Government, on being satisfied that it is necessary in the public interest so to do, hereby makes the following further amendments in the notification of the Government of India in the Ministry of Finance (Department of Revenue), No. 9/2012-Customs, published in the Gazette of India, Extraordinary, Part II, section 3, sub-section (i) vide number G.S.R. 129(E), dated the 9th March, 2012, namely :-

In the said notification, in condition (v), for the proviso, the following proviso shall be substituted, namely: -

“Provided that a variance not exceeding ± 0.05 mm in diameter for round shape diamonds and ± 0.07 mm in length and breadth for diamonds of other shapes, variance not exceeding ± 0.01 mm in height and variance not exceeding ± 1 cent in weight shall be allowed.”.

[For further details please refer the Notification]

DGFT

NOTIFICATION

EXTENSION OF RODTEP FOR ADVANCE AUTHORIZATIONS (AAS) HOLDERS, SPECIAL ECONOMIC ZONES (SEZs), AND EXPORT-ORIENTED UNITS (EOUS) UPTO 05.02.2025

OUR COMMENTS: The Ministry of Commerce and Industry vide Notification no. 66/2024-25 dated 20.03.2025 notified that in exercise of the powers conferred by Section 5 of the Foreign Trade (Development and Regulation) Act, 1992, read with Para 1.02 of the Foreign Trade Policy 2023, the Central Government hereby notifies, in partial super-session of Notification No. 32/2024-25 dated 30.09.2024, the following:

1. The support under the Remission of Duties and Taxes on Exported Products (RoDTEP) scheme for export of products manufactured by Advance Authorizations (AAs) holders, Special Economic Zones (SEZs), and Export-Oriented Units (EOUs) stands extended only up to 05.02.2025.

Effect of this Notification: The Support under the RoDTEP Scheme for exports of products manufactured from AAs, SEZs, and EOUs has been extended up to 05.02.2025. However, from 06.02.2025 onwards, exports from these categories will no longer be eligible for RoDTEP support. The support under the RoDTEP Scheme for other categories (DTA) shall continue as per Notification No. 32/2024-25.

[For further details please refer the Notification]

NOTIFICATION

AMENDMENT IN IMPORT POLICY CONDITION OF UREA [EXIM CODE 31021010] IN THE ITC (HS) 2022, SCHEDULE - I (IMPORT POLICY)

OUR COMMENTS: The Ministry of Commerce and Industry vide Notification no. 65/2024-25 dated 18.03.2025 notified that 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 (FTP), 2023, as amended from time to time, and in continuation of Notification Nos. 54/2015-20 dated 24.02.2023, 61/2015-20 dated 22.03.2023 and 79/2023 dated 18.03.2024, the Central Government hereby **extends the STE status of Indian Potash Limited (IPL) from 31.03.2025 to 31.03.2026 for import of Urea on Government account**, by amendment in Import Policy Condition under ITC(HS) Code 31021010 of Chapter 31 of ITC (HS), 2022, Schedule - I (Import Policy). All other terms and conditions remains the same as in the Notification No. 79/2023 dated 18.03.2024.

Effect of this Notification:

Import of Urea (Agricultural grade) on Government account is allowed through Indian Potash Limited (IPL) subject to Para 2.21 of FTP 2023, **till 31.03.2026.**

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

[For further details please refer the Notification]

PUBLIC NOTICE

EXTENSION OF THE LAST DATE FOR FILING ANNUAL RODTEP RETURN (ARR) FOR FINANCIAL YEAR 2023-24

OUR COMMENTS: The Ministry of Commerce and Industry vide Public Notice no. 51/2024-25 dated 19.03.2025 notified that in exercise of powers conferred under paragraph 1.03 and 2.04 of the Foreign Trade Policy, 2023, as amended from time to time, the last date for filing Annual RoDTEP Return (ARR) as provided under Para 4.94 of Handbook of Procedure through Public Notice No. 27 dated 23.10.2024 for the financial year 2023-24 is extended from 31.03.2025 to 30.06.2025. Similarly, the applicable grace period is also extended from 30.06.2025 to 30.09.2025.

Effect of the Public Notice: The last date for filing ARR is extended by three (3) months for RoDTEP availed for exports of Financial Year 2023-24.

[For further details please refer the Public Notice]

TRADE NOTICE

REVIEW THE SIONS PERTAINING TO AUTOMOBILE TYRES

OUR COMMENTS: The Ministry of Commerce and Industry vide Trade Notice no. 34/2024 dated 20.03.2025 notified that This Directorate is initiating a process to review the existing SIONS of automobile tyres, (A-1722, A-1717, A-1667, A-1666, A1673, A-1665, A1664, A-1663)

2. Therefore, all concerned EPCs, Exporters, Trade bodies and other stakeholders, who are availing the said SIONS, are advised to examine their respective SIONS as it exists today and provide necessary comments/suggestions on why and how such SIONS require modification if any.

3. Suggestions for such modification of SION, if any, be accompanied by detailed justification, along with production and consumption data, wastage norms duly certified by Chartered engineer and other relevant documents.

4 The same may be sent within 45 days from the date of issuance of this Trade Notice to the email Id, **nc7.dgft@gov.in**, for further examination by this Directorate.

[For further details please refer the Trade Notice]

IN STANDS NOW INCOME TAX BILL 2025 WITH COMMENTARY

Other Useful Books for your Library

INCOME TAX BILL, 2025 WITH COMMENTARY

Incorporating:

- Comparative Table Showing Income Tax Act, 1961 and Provisions of New Income Tax Bill, 2025
- Statement Of Objects & Reasons
- Notes on Clauses
- Financial Memorandum
- Income Tax Bill, 2025
- "Tabular Clause- wise Contents of the New Income Tax Bill"
- Commentary on the New Income Tax Bill
- FAQs on New Income Tax Bill

Vivek Jalan
FCA, LL.M (Constitutional Law)
LL.B, MBA (International Trade), B.COM(H)

Giridhar Dhelia
Advocate: FCA, ACS, B.COM(H)

2025

B.C. PUBLICATIONS

₹ 1495

CONTENTS

1. Comparative Table Showing Income Tax Act, 1961 and Provisions of New Income Tax Bill, 2025
2. Statement Of Objects & Reasons
3. Notes on Clauses
4. Financial Memorandum
5. Income Tax Bill, 2025
6. "Tabular Clause- wise Contents of the New Income Tax Bill"
7. Commentary on the New Income Tax Bill
8. FAQs on New Income Tax Bill

Author:

Vivek Jalan

[FCA, LL.M (Constitutional Law), LL.B, MBA(International Trade), B.Com(H)]

Giridhar Dhelia

Advocate, FCA, ACS, B.COM(H)

Published by:

BOOK CORPORATION

4, R. N. Mukherjee Road

Kolkata 700001

Phones: (033) 64547999

Cell: 9830010297, 9331018333

Order by email: bookcorporation@gmail.com

Website : www.bookcorporation.com

In Association With:

TAX CONNECT ACADEMY

6, Netaji Subhas Road,

Kolkata 700001

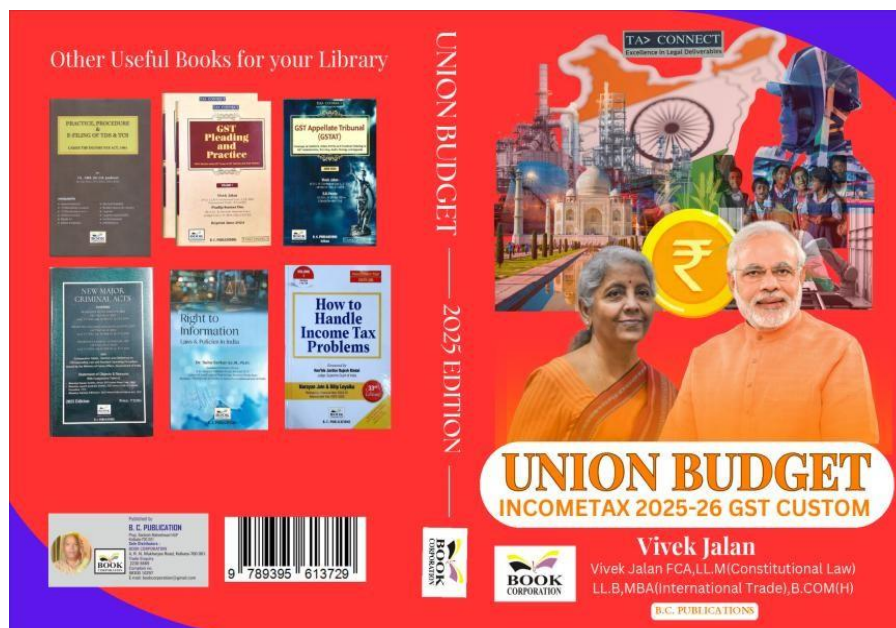
Cell: 7003384915

Order by email: info@taxconnect.co.in

Website : www.taxconnect.co.in

:IN STANDS

UNION BUDGET – 2025 EDITION



CONTENTS

- 1. Commentary on Budget**
- 2. Budget at a glance**
- 3. Finance Minister's Budget Speech**
- 4. Finance Bill**
- 5. Memorandum**
- 6. Notes on Clauses**

Author:

Vivek Jalan

[FCA, LL.M (Constitutional Law), LL.B, MBA(International Trade), B.Com(H)]

Published by:

BOOK CORPORATION

4, R. N. Mukherjee Road

Kolkata 700001

Phones: (033) 64547999

Cell: 9830010297, 9331018333

Order by email: bookcorporation@gmail.com

Website : www.bookcorporation.com

In Association With:

TAX CONNECT ACADEMY

6, Netaji Subhas Road,

Kolkata 700001

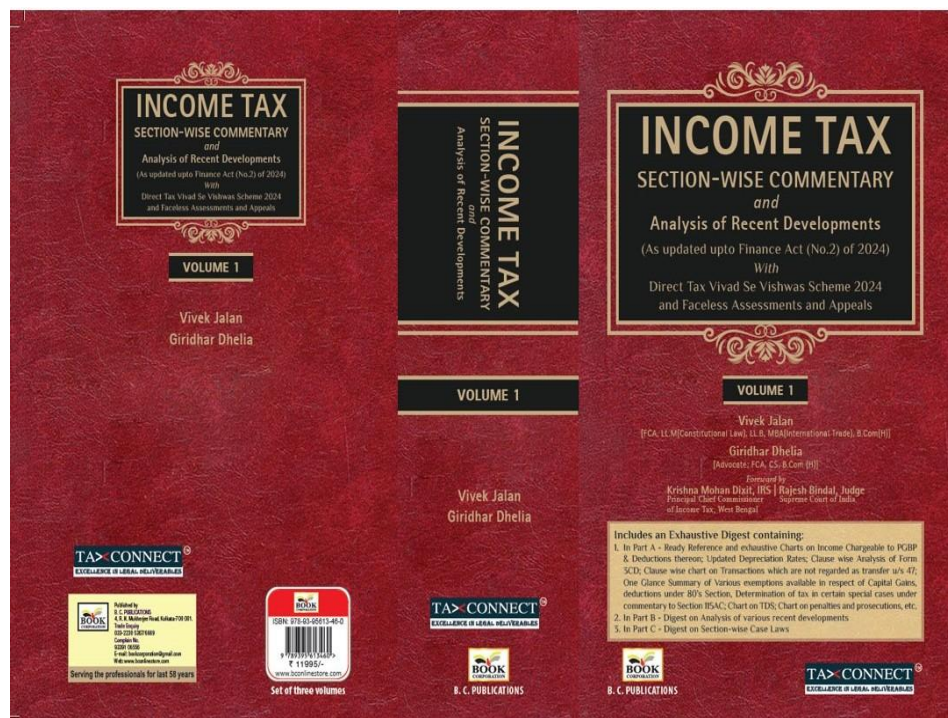
Cell: 7003384915

Order by email: info@taxconnect.co.in

Website : www.taxconnect.co.in

:IN STANDS

Income Tax Section-Wise Commentary and Analysis of Recent Developments



CONTENTS

1. In Part A – Ready Reference and exhaustive Charts on Income Chargeable to PGBP & Deductions thereon; Updated Depreciation Rates; Clause wise Analysis of Form 3CD; Clause wise chart on Transactions which are not regarded as transfer u/s 47; One Glance Summary of various exemptions available in respect of Capital Gains, deductions under 80's sections, Determination of tax in certain special cases under commentary to section 115AC; Chart on TDS; Chart on penalties and prosecutions, etc.
2. In Part B – Digest on Analysis of various recent developments
3. In Part C – Digest on Section-wise Case Laws

Authors:

Vivek Jalan

[FCA, LL.M (Constitutional Law), LL. B, B. Com(H)]

Published by:

BOOK CORPORATION

4, R. N. Mukherjee Road
Kolkata 700001

Phones: (033) 64547999

Cell: 9830010297, 9331018333

Order by email: bookcorporation@gmail.com

In Association With:

TAX CONNECT ACADEMY

6, Netaji Subhas Road,
Kolkata 700001

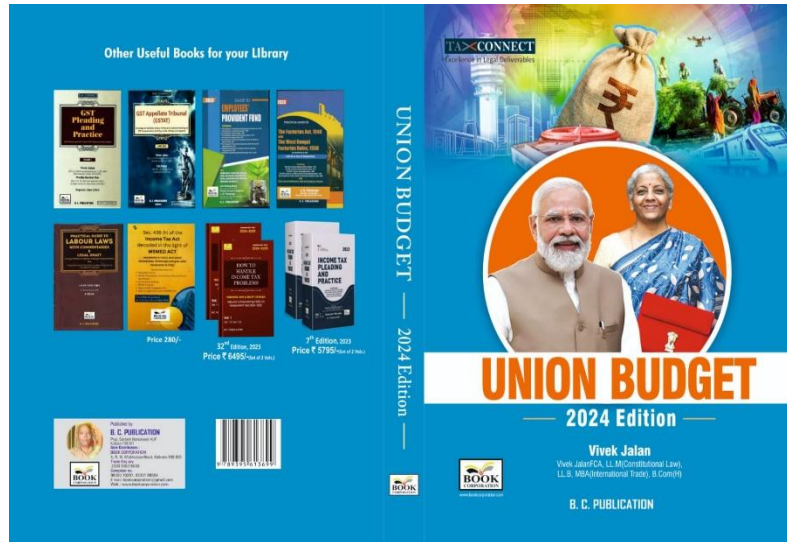
Cell: 7003384915

Order by email: info@taxconnect.co.in

Website : www.taxconnect.co.in

:IN STANDS

UNION BUDGET – 2024 EDITION



CONTENTS

1. **Commentary on Budget**
2. **Budget at a glance**
3. **Finance Minister's Budget Speech**
4. **Finance Bill**
5. **Memorandum**
6. **Notes on Clauses**

Author:

Vivek Jalan

[FCA, LL.M (Constitutional Law), LL.B, MBA(International Trade), B.Com(H)]

Published by:

BOOK CORPORATION

4, R. N. Mukherjee Road

Kolkata 700001

Phones: (033) 64547999

Cell: 9830010297, 9331018333

Order by email: bookcorporation@gmail.com

Website www.bookcorporation.com

In Association With:

TAX CONNECT ACADEMY

6, Netaji Subhas Road,

Kolkata 700001

Cell: 7003384915

Order by email: info@taxconnect.co.in

Website : www.taxconnect.co.in

:IN STANDS

GST APPELLATE TRIBUNAL (GSTAT)



CONTENTS

1. A detailed Synopsis of GSTAT Appeals, Practice, Policy and Procedures
2. Master Summary of Act, Rules and Forms with brief understanding
3. Section-wise Commentary with Related provisions, Rules and Forms
4. Expectations From The Goods And Services Tax Appellate Tribunal (Procedure) Rules, 202x

Author:

Vivek Jalan

[FCA, LL.M (Constitutional Law), LL.B, MBA(International Trade), B.Com(H)]

S.K. Panda

[IRS-Retd.; Ex-Member CBIC & Special Secretary – GoI]

Published by:

BOOK CORPORATION

4, R. N. Mukherjee Road

Kolkata 700001

Phones: (033) 64547999

Cell: 9830010297, 9331018333

Order by email: bookcorporation@gmail.com

Website : www.bookcorporation.com

In Association With:

TAX CONNECT ACADEMY

6, Netaji Subhas Road,

Kolkata 700001

Cell: 7003384915

Order by email: info@taxconnect.co.in

Website : www.taxconnect.co.in

:IN STANDS

GST PLEADING AND PRACTICE: With Section-wise GST Cases & GST Notices and their Replies



ABOUT THE BOOK: This publication includes:

1. Recent GST Notices and their Replies
 - Recent Orders and Appeals under GST
 - Text of provisions under IGST Act 2017 & CGST Act 2017 updated as per Finance Act, 2023
2. CGST & IGST Section-Wise Rules, Forms, Case Laws And Notification/Circulars GIST
 - CGST & IGST Section-wise Synopsis of "Question of Law" answered under GST
3. Completely Updated Synopsis Of Case Laws under GST by Supreme Court, High Court, AAARS & AARS

Authors:

Vivek Jalan

[FCA, LL.M (Constitutional Law), LL. B, B. Com(H)]

Pradip Kumar Das

[M.A. LL. B; Advocate Supreme Court & High Courts; Fr. Mem (Jud.) CESTAT]

Published by:

BOOK CORPORATION

4, R. N. Mukherjee Road

Kolkata 700001

Phones: (033) 64547999

Cell: 9830010297, 9331018333

Order by email: bookcorporation@gmail.com

Website : www.bookcorporation.com

In Association With:

TAX CONNECT ACADEMY

6, Netaji Subhas Road,

Kolkata 700001

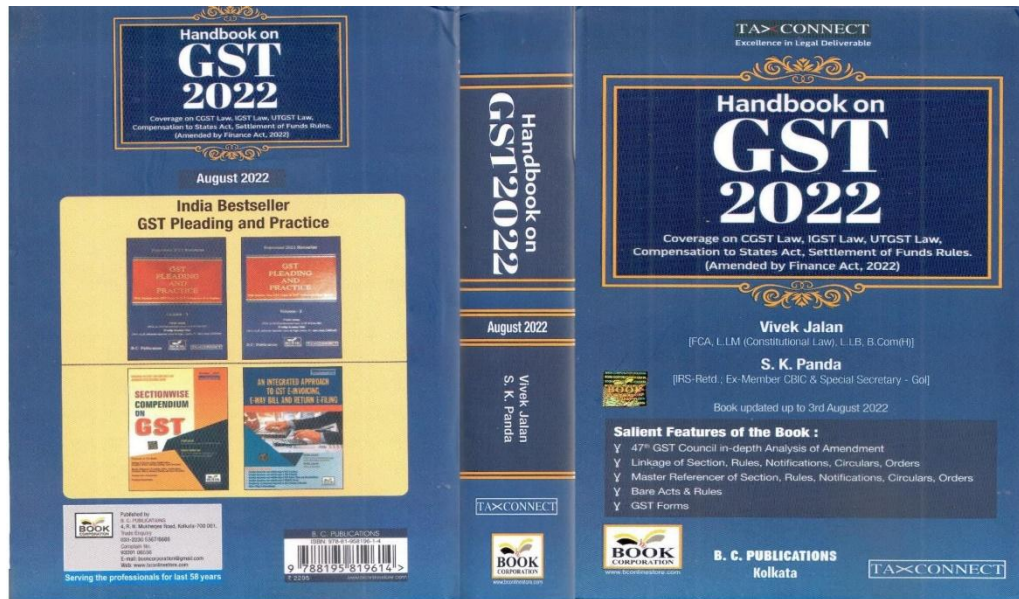
Cell: 7003384915

Order by email: info@taxconnect.co.in

Website : www.taxconnect.co.in

:IN STANDS

HANDBOOK ON GST 2022



CONTENTS

5. 47th GST Council in-depth Analysis of Amendment
6. Linkage of Section, Rules, Notifications, Circulars, Orders
7. Master Reference of Section, Rules, Notifications, Circulars, Orders
8. Bare Acts & Rules
9. GST Forms

Author:

Vivek Jalan

[FCA, LL.M (Constitutional Law), LL.B, B.Com(H)]

S.K. Panda

[IRS-Retd.; Ex-Member CBIC & Special Secretary – GoI]

Published by:

BOOK CORPORATION

4, R. N. Mukherjee Road
Kolkata 700001

Phones: (033) 64547999

Cell: 9830010297, 9331018333

Order by email: bookcorporation@gmail.com

Website : www.bookcorporation.com

In Association With:

TAX CONNECT ACADEMY

6, Netaji Subhas Road,
Kolkata 700001

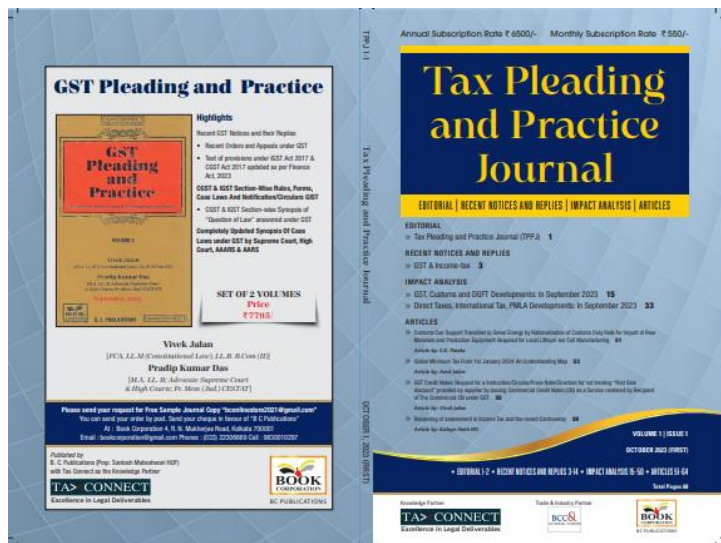
Cell: 7003384915

Order by email: info@taxconnect.co.in

Website : www.taxconnect.co.in

:IN STANDS

TAX PLEADING AND PRACTICE JOURNAL



CONTENTS

7. Recent Notices and replies on GST & Income Tax
8. Impact Analysis on GST, Customs and DGFT Developments: In September 2023
9. Impact Analysis on Direct Taxes, International Tax, PMLA Developments: In September 2023
10. Articles

Author:

Vivek Jalan
[FCA, LL.M (Constitutional Law), LL.B, B.Com(H)]

S.K. Panda
[IRS-Retd.; Ex-Member CBIC & Special Secretary – GoI]

P.K. Das
[IRS-Retd.; Ex-Member CBDT & Special Secretary – GoI]

Published by:

BOOK CORPORATION
4, R. N. Mukherjee Road
Kolkata 700001
Phones: (033) 64547999
Cell: 9830010297, 9331018333
Order by email: bookcorporation@gmail.com
Website : www.bookcorporation.com

In Association With:

TAX CONNECT ACADEMY
6, Netaji Subhas Road,
Kolkata 700001
Cell: 7003384915
Order by email: info@taxconnect.co.in
Website : www.taxconnect.co.in

:IN STANDS

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



CONTENTS

1. 50 Most Burning issues in GST-Litigation
2. Reference of Section, Rules, Notifications, Circulars, Orders relating to GST Assessment, Scrutiny, Audit & Appeal
3. Case Laws relating to GST Litigation handling
4. GST Forms relating to Litigation handling
5. New process to file returns in GSTR 3B as per circular 170 explained in details u/s 59
6. Discussion on SOP on Scrutiny of Returns and GST Audit Manual by CBIC under respective Sections
7. Discussion on Recent Instruction on GST-Summons, Arrest and Bail

Authors:

Vivek Jalan

[FCA, LL.M (Constitutional Law), LL. B, B. Com(H)]

Bikramjit Ghosh

[FCA, B. Com(H)]

Published by:

BOOK CORPORATION

4, R. N. Mukherjee Road
Kolkata 700001

Phones: (033) 64547999

Cell: 9830010297, 9331018333

Order by email: bookcorporation@gmail.com

In Association With:

TAX CONNECT ACADEMY

6, Netaji Subhas Road,
Kolkata 700001

Cell: 7003384915

Order by email: info@taxconnect.co.in

Website : www.taxconnect.co.in

LET'S DISCUSS FURTHER!

OUR OFFICES:

MUMBAI

Unit No. 312, Omega Business Park, Near Kaamgar Hospital, Road No. 33, Wagle Industrial Estate, Thane West, Maharashtra- 400604

Contact Person: Rohit Vishwakarma

Email: rohit.vishwakarma@taxconnectwest.co.in

BENGALURU

951, 24th Main Road, J P Nagar, Bengaluru, Karnataka – 560078.

Contact Person: Anil Pal

Email: anil.pal@taxconnectdelhi.co.in

DELHI (NCR)

B-139, 2nd Floor, Transport Nagar, Noida-201301 (U.P)

Contact Person: Poonam Khemka

Email: poonam.khemka@taxconnect.co.in

KOLKATA

6, Netaji Subhas Road, 3rd Floor, Royal Exchange Building, Kolkata - 700001

Contact Person: Sandeep Mandal

Email: sandeep.mandal@taxconnect.co.in

KOLKATA

R No 119; 1st Floor; Diamond Arcade; 1/72, Cal Jessore Road, Kolkata – 700055

Contact Person: Uttam Kumar Singh

Email: uttam.singh@taxconnect.co.in

DUBAI

Azizi Feirouz, 803, 8th Floor, AL Furjan, Opposite Discovery Pavillion, Dubai, UAE

Contact Person: Rohit Sharma

Email: rohit.sharma@taxconnect.co.in

Disclaimer:

This e-bulletin is for private circulation only. Views expressed herein are of the editorial team and are based on the information, explanation and documents available on Government portal platforms. Tax Connect or any of its employees do not accept any liability whatsoever direct or indirect that may arise from the use of the information contained herein. No matter contained herein may be reproduced without prior consent of Tax Connect. While this e-article has been prepared on the basis of published/other publicly available information considered reliable, we do not accept any liability for the accuracy of its contents.

Tax Connect 2025. All rights reserved.