

506th Issue: 25th May 2025 - 31st May 2025



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, 2ndFloor, Transport Nagar, Noida-201301 (U.P)

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

- Room No. 119, 1stFloor, "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 : <u>www.taxconnect.co.in</u>
Email : info@taxconnect.co.in



BCC&i AIDING BUSINESS SINCE 1833

EDITORIAL



Friends,

Amid a backdrop of global uncertainty, ranging from geopolitical conflicts and tariff wars to the rapid advancement of Artificial Intelligence threatening traditional jobs, many Indian immigrants in the United States have increasingly been looking to transfer their savings back home. For most, Indian real estate remains a preferred asset class, offering emotional security and long-term financial value. However, a proposed change in U.S. tax policy could significantly alter the dynamics of these cross-border investments.

Under the new Republican tax provisions, spearheaded by former President Donald Trump as part of his 2025 re-election agenda, a 5% tax is proposed on all international remittances sent by non-citizens from the U.S. to foreign countries. This includes remittances sent by H-1B visa holders and Green Card holders, two primary categories under which most Indian professionals reside and work in the United States.

If enacted, this tax will be levied at the source, thereby directly reducing the amount that Indian immigrants can remit to their home country. The impact on real estate investments is particularly concerning. Traditionally, many NRIs (Non-Resident Indians) have opted to invest in property as a way of retaining strong financial and emotional ties to India. The new tax proposal stands to erode the value of these investments by raising the effective cost of acquiring property in India.

To illustrate the financial burden, consider an NRI planning to purchase a property in India worth \$100,000, approximately ₹80 lakh (assuming an exchange rate of ₹80 per U.S. dollar). Under the existing regulations, they would remit ₹80 lakh from their post-tax U.S. income to fund the purchase. However, if the proposed 5% remittance tax comes into effect, the same individual would need to remit ₹84 lakh to account for the additional tax—₹4 lakh of which would go to the U.S. government. This would effectively increase the cost of the property for the NRI buyer by 5%, without any corresponding increase in asset value or benefit in India.

One of the most critical aspects of the proposed tax is that it offers no tax credit or refund to non-citizens. Unlike U.S. citizens, who may claim credit for the remittance tax against their total tax liability, non-citizens, particularly those on work visas or

holding Green Cards—would have no such option. For them, this 5% charge would function as an additional, non-recoverable tax.

For instance, if an NRI currently remits ₹1 lakh per month to pay an EMI in India, they would need to remit ₹1.05 lakh after the proposed tax is implemented—₹5,000 of which would be absorbed as tax. Over the span of a year, this translates into an additional cost of ₹60,000, with no direct tax relief available in either country.

Given the uncertainty around the timing and exact scope of the proposed law, NRIs would be well advised to begin planning now. Those considering property purchases in the near term may choose to advance their transactions to avoid falling under the new tax regime. Similarly, those with ongoing EMI obligations could consider consolidating future payments into larger lump sums before the law is enacted.

India imposes a remittance tax, which functions as an advance tax collected through the Electronic Clearing System (ECS). This tax is refundable, as taxpayers can claim a credit for it, effectively reducing their financial burden. In contrast, the proposed 5% tax in the United States is an indirect tax that offers no credit or refund to Non-Resident Indians (NRIs). Consequently, this tax represents an additional, non-recoverable cost for NRIs, increasing the expense of remitting funds for investments such as property purchases in India.

Whether or not one intends to purchase property, any planned remittances should be made to India immediately. Doing so before the proposed tax comes into effect can help avoid the additional 5% levy. If you were planning a property purchase in the next 6–12 months, it may be prudent to advance your remittance schedule to lock in lower overall costs. This can help you avoid the non-refundable 5% tax, which would otherwise increase your acquisition cost.

Just to reiterate that we remain available over telecom or email.

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	5-7
NOTIFICATION	INCOME-TAX (NINETEENTH AMENDMENT) RULES, 2025	
3]	GST	8
CASE LAW	M/S MANSI OVERSEAS VERSUS PRINCIPAL COMMISSIONER OF GOODS AND SERVICE TAX EAST DELHI & ANR.: DELHI HIGH COURT	
4]	FEMA	9
CIRCULAR	REPORTING ON FIRMS PORTAL – ISSUANCE OF PARTLY PAID UNITS BY INVESTMENT VEHICLES	
5]	CUSTOMS	10-11
NOTIFICATION	SEEKS TO AMEND NOTIFICATION NO. 55/2022-CUSTOMS DATED 31.10.2022 TO REMOVE THE CONDITION REQUIRED FOR AVAILING EXEMPTION ON BANGALORE ROSE ONION	
NOTIFICATION	AMENDMENT IN THE NOTIFICATION NO. 63-1994-CUSTOMS (N.T) DATED 21.11.1994 IN RESPECT OF LAND CUSTOMS STATION, RAXAUL	
NOTIFICATION	APPOINTMENT OF COMMON ADJUDICATION AUTHORITY FOR DE-NOVO ADJUDICATION IN RESPECT OF HUNDRED PERCENT EXPORT ORIENTED UNDERTAKINGS	
6]	DGFT	12-14
NOTIFICATION	HARMONISATION OF SCHEDULE-IL (EXPORT POLICY), ITC (HS) 2022 WITH AMENDMENTS INTRODUCED VIDE FINANCE ACT, 2025	
NOTIFICATION	AMENDMENT IN IMPORT POLICY AND POLICY CONDITIONS OF SPECIFIC ITC (HS) CODES UNDER CHAPTER 71 OF SCHEDULE -I(IMPORT POLICY) OF ITC (HS) 2022 IN SYNC WITH THE FINANCE ACT 2025	
NOTIFICATION	PORT RESTRICTION ON IMPORT OF CERTAIN GOODS FROM BANGLADESH TO INDIA - INSERTION OF A NEW PARA 19 UNDER 'GENERAL NOTES REGARDING IMPORT POLICY' UNDER ITC (HS), 2022 SCHEDULE 1 (IMPORT POLICY)	
7]	INCOME TAX BILL 2025 WITH COMMENTARY	15
8]	UNION BUDGET – 2025 EDITION	16
9]	INCOME TAX SECTION-WISE COMMENTARY AND ANALYSIS OF RECENT DEVELOPMENTS	17
10]	UNION BUDGET – 2024 EDITION	18
11]	GST APPELLATE TRIBUNAL (GSTAT)	19
12]	GST PLEADING AND PRACTICE: WITH SECTION-WISE GST CASES & GST NOTICES AND THEIR REPLIES	20
13]	HANDBOOK ON GST 2022	21
14]	TAX PLEADING AND PRACTICE JOURNAL	22
15]	HOW TO HANDLE GST LITIGATION: ASSESSMENT, SCRUTINY, AUDIT & APPEAL	23
16]	LET'S DISCUSS FURTHER	24





TAX CALENDAR

Date	Form/Return/Challan	Reporting Period	Description
28 th May	GSTR-11	APRIL'2025	Statement of inward supplies by persons having a Unique Identification Number (UIN) for claiming a GST refund
30 th May	Challan-cum-statement	APRIL'2025	Due date for furnishing of challan-cumstatement in respect of tax deducted under section 194-IA, 194-M, 194-IB, 194S in the month of April, 2025
30 th May	TCS Certificates	FY 2024-25	Issue of TCS certificates for the 4th Quarter of the Financial Year 2024-25
31 ^{at} May	TDS Deposited	JANUARY-MARCH'2025	Quarterly statement of TDS deposited for the quarter ending March 31, 2025
31 st May	Form No. 61A	FY 2024-25	Due date for furnishing of statement of financial transaction (in Form No. 61A) as required to be furnished under subsection (1) of section 285BA of the Act respect for financial year 2024-25
31 st May	Form No. 61B	JANUARY-DECEMBER'2024	Due date for e-filing of annual statement of reportable accounts as required to be furnished under section 285BA(1)(k) (in Form No. 61B) for calendar year 2024 by reporting financial institutions
31 st May	Application for allotment of PAN	FY 2024-25	Application for allotment of PAN in case of non-individual resident person, which enters into a financial transaction of Rs. 2,50,000 or more during FY 2024-25 and hasn't been allotted any PAN
31 st May	Application in Form 9A	FY 2025-26	Application in Form 9A for exercising the option available under Explanation to section 11(1) to apply income of previous year in the next year or in future (if the assessee is required to submit return of income on or before July 31, 2025)
31 st May	Form no. 10	FY 2025-26	Statement in Form no. 10 to be furnished to accumulate income for future application under section 10(21) or section 11(1) (if the assessee is required to submit return of income on or before July 31, 2025)
31 st May	Form 10BD	FY 2024-25	Statement of donation in Form 10BD to be furnished by reporting person under section 80G(5)(iii) or section section 35(1A)(i) in respect of the financial year 2024-25.
31 st May	Form no. 10BE	FY 2024-25	Certificate of donation in Form no. 10BE as referred to in section 80G(5)(ix) or section 35(1A)(ii) to the donor specifying the amount of donation received during the financial year 2024-25.





INCOME TAX

NOTIFICATION INCOME-TAX (NINETEENTH AMENDMENT) RULES, 2025

OUR COMMENTS: The Central Board of Direct Taxes vide Notification No. 49/2025 dated 19.05.2025 notified that in exercise of the powers conferred by sub-section (8A) of section 139 read with section 295 of the Income-tax Act, 1961 (43 of 1961), the Central Board of Direct Taxes hereby makes the following rules further to amend the Income-tax Rules, 1962, namely:-

- 1. Short title and commencement. —
- (1) These rules may be called the Income-tax (Nineteenth Amendment) Rules, 2025.
- (2) They shall come into force on the date of their publication in the Official Gazette.
- 2. In the Income-tax Rules, 1962, in Appendix-II, for Form ITR U, the following Form ITR-U (ITR for updated return) shall be substituted, namely: -

"FORM	ITR-U	ı	INDIAN INCOME TAX				
			UPDATED RETURN				
			[For persons to update				
			income within forty-eight				
		r	months from the end of the				
			relevant assessment year]				
			(Refer instructions for				
			eligibility)				
			Please see rule 12AC of the				
			Income-tax Rules, 1962)				
PART	A - GENERA	L INFOR	MATION - 139(8A)				
(A1) PA	N	(A2)) (A3) Aadhaar Number (1				
			digits)				
		Name					

(A4) Assessment Ye	ar	(A5)	whether	(A6) If yes,			
[Please see instruction	on]			Whether filed			
	_	previo	ously filed	u/s139(1)			
		-	or this	Others			
		'	71 (1113	0tile13			
			essment				
		y	/ear?				
		_Ye	s _No				
(A7) If applicable,	(Ple	ase	Ack No. a	nd date			
enter form filed,	selec	t ITR	of fil	ing			
Acknowledgement No.	type	from					
or Receipt No. and	dropd			/ /			
Date of filing original	шоро	,					
return (DD/MM/YYYY)							
(A8) Are you eligible f	or filin	g an u	pdated ret	turn as per the			
conditions laid out in f	irst, se	cond,	third and	fourth provisos			
to	sectio	n 139((8A)?				
	Yes	sN	lo				
(A9) Please choose th	ne ITR f	orm fo	or updating	your income			
(ITRs 1-7 to be selected			•	-			
details made availab		-		•			
	-						
(A10) Reason	ns for u	ıpdatır	ng your inc	come:			
Retu	ırn pre	viously	y not filed				
Incom	e not r	eporte	ed correctl	У			
Wrong	heads	of inc	ome chose	en			
Reducti	on of c	arried	forward lo	oss			
Reduction	of una	bsorb	ed depreci	ation			
Reduction of tax credit u/s 115JB/115JC							
Wrong rate of tax							
		Others					
(A11) Are you filing the updated return during the period							





INCOME TAX

- __upto 12 months from the end of the relevant assessment year

 __between 12 to 24 months from the end of the relevant assessment year

 __between 24 to 36 months from the end of the relevant assessment year

 __between 36 to 48 months from the end of the relevant assessment year

 (A12) (a) Are you filing the updated return to reduce carried forward loss or unabsorbed depreciation or tax credit? __Yes __No

 (b) If yes, please specify the assessment years where carried forward loss or unabsorbed depreciation or tax credit is being affected because of this updated return. (Please select from drop down menu)
- __Whether original/revised return has been filed for the AY in (b) above __Yes __No
 - __Whether updated return has been filed for the AY in (b) above __Yes __No

PART B – ATI COMPUTATION OF TOTAL UPDATED INCOME AND TAX PAYABLE

		AND TAX PAYABLE	
1.	Α	Head of income under which additional	Amount
		income is being returned as per Updated	in Rs.
		Return	
		Head of income (If yes, please specify	
		additional income)	
	а	Income from Salary	
	b	Income from House Property	
	С	Income from Business or Profession	
	d	Income from Capital gains	
	е	Income from other Sources	
	f.	Total additional income (a+b+c+d+e)	
	В.	Total income as per last valid return (only in	
		cases where the Income Tax Return has	
		previously been filed)	

2.	Total income	
	As per Part B-TI of ITR-2/3/5/6/7 or Part C-	
	Deductions and Taxable Total Income of ITR-	
	1/4 (as applicable)	
	(Please see instruction)	
3.	Amount payable, if any	
	(To be taken from the "Amount payable" of	
	Part B-TTI of updated ITR-2/3/5/6/7 or Part D-	
	Computation of Tax Payable of updated ITR-1	
	or Part D- Tax computations and Tax Status of updated ITR-4) (as applicable)	
	upuateu ITK-4) (as applicable)	
	(Please see instruction)	
4.	Amount refundable, if any	
	(To be taken from "Refund" of Part B-TTI of	
	updated ITR-2/3/5/6/7 or Part D-	
	Computation of Tax Payable of updated ITR-1	
	or Part D- Tax computations and Tax Status of	
	updated ITR-4) (as applicable)	
	(Please see instruction)	
5.	Amount payable on the basis of last valid	
	return (only in applicable cases)	
6.	(i) Refund claimed as per last valid return, if	
	any (Please see instruction)	
	(ii) Total Refund issued as per last valid return,	
	if any (including interest u/s 244A received)	
	(Please see instruction)	
7.	Fee for default in furnishing return of income	
	u/s 234F	
8.	Regular Assessment Tax, if any (in applicable	
	cases)	
	/5	
	(Please mention the tax paid which is over and	
	above the tax payable declared in sl.no.5)	
9.	Aggregate liability on additional income,	
	(i) in case refund has been issued [3 + 6ii- (5 + 8	
	+4)])	
	(ii) in case refund has not been issued [3 + 6i -	
	(5+8+4)]	





INCOME TAX

10.	Additional income-tax liability on updated income [25% or 50% or 60% or 70% of (9-7)]	
11.	Net amount payable (9+10)	
12.	Tax paid u/s 140B	
13.	Tax due (11-12)	

14.	TAX F	P	۱Y	M	ENT	s (o	NLY	as p	er	Up	dat	ed	Ret	urn
Α	Deta	Details of payments of tax on updated return												
							u/s	140E	3					
TAX PAID U/S 140B	SI No	BSR Date of Deposit Serial Amou Cod (DD/MM/YYYY) Number (Rs)												
			е	е				C	oi hal	f lan				
	(1)		(2)		(3	3)			(4)		(5	5)
	i			Ī										
	ii													
	iii													
	iv			İ										
	NOT		Er	nt	er th	e to	tals	of ta	ax p	oai	d u/	's 1	L40I	3 at
	E ►					SI. I	No.1	1 of	Pa	rt E	3-A7	П		
В		-				TAX	(PA	YME	NT	S				
	De	ta	ails	s (of pa	ayme	ents	of A	dva	nc	e Ta	ıx ,	/ Se	lf-
	Ass	se	ess	m	ent	Tax	/ Re	gulai	r As	sse	ssm	en	it Ta	ıx,
	cred	ib	t f	OI	wh	ich h	as n	ot b	eer	ı cl	aim	ed	in t	he
	earli	e	r r	et	urn	(cre	dit fo	or th	e s	am	e is	no	ot to	be
		al	lo	W	ed a	gain	und	er se	ect	ion	140)B((2))	
ADVANCE/SEL	SI N	0		В	SR		Date	e of		9	Seria	al	An	nour
F				C	ode		Dep				um	be	t (Rs)
ASSESSMENT/						(DD	/MN	//Y	/YY		r of			
REGULAR)			Cl	hall	an		
ASSESSMENT	(1)			(2)		(3	3)			(4)		(5)
TAX	i													
	ii													
	iii													
	iv													
	NOT	NOT Credit for above is not to be allowed												
	E ► again under section 140B(2)													

VERIFICATION

I, son/ daughter of solemnly declare that to the best of my knowledge and belief, the information given in the return is correct and complete and is in accordance with the provisions of the Income-tax Act, 1961. I further declare that I am making this return in my capacity as (drop down to be provided in e-filing utility) and I am also competent to make this return and verify it. I am holding permanent account number. (Please see instruction).

[For further details please refer the Notification]

Tax Connect: 506th Issue 25th May 2025- 31st May 2025

[relief for the same is not to be allowed under section 140B(2)]



GST



CASE LAW

M/S MANSI OVERSEAS VERSUS PRINCIPAL COMMISSIONER
OF GOODS AND SERVICES TAX EAST DELHI & ANR.: DELHI
HIGH COURT

OUR COMMENTS: In the instant case proceedings initiated against the petitioner on the basis of provisional attachment of the petitioner's bank account under Section 83 of the Central Goods & Services Tax Act, 2017. Fresh attachment initiated since the initial (previous) attachment order was quashed. The alleged failure to render cooperation in the disposal of those show cause proceedings it has been held that Section 83 of the CGST Act mandates that provisional attachment may be exercised in situations where the Commissioner is of the opinion that "for the purpose of protecting the interest of Government revenue" such an action "is necessary so to do". The Supreme Court in Radha Krishnan also recognised the triumvirate conditions embodied in the provision, which is that the attachment of property is intended to be provisional, i.e., "in aid of something else", the purpose of such attachment must be to protect the interests of the Revenue and that the conditions as laid down within the provision must be met in order for such attachment to be deemed as a valid exercise of power.

The respondents, in clear contravention of the requirements laid down in Radha Krishnan [2021 (4) TMI 837 - SUPREME COURT] have been unable to demonstrate any reasonable apprehension that the writ petitioner herein was at risk of defaulting on payment of any demands that may come to be imposed. On the contrary, the only reasons adduced by the respondents for the initiation of Section 83 proceedings was that the writ petitioner had failed to file any response to the DRC-01 or the SCN, did not attend the hearing of the adjudicating authority and allegedly refused to cooperate

with the respondents during the adjudication of show cause proceedings - such reasoning abjectly fails to meet the thresholds as engrafted within the provision, of the respondents being required to form an opinion that it is necessary to provisionally attach the property so as to protect the interest of government revenue.

As observed by the Supreme Court in Radha Krishnan, the draconian nature of the provision and the grave consequences that are suffered by a person whose property is provisionally attached necessitates that the criterion for valid initiation of Section 83 actions are met. This requires the production of cogent and credible material basis which the respondents could have reasonably come to form an opinion that a provisional attachment is necessary and essential for the purposes of securing the interests of government revenue. It surely cannot be justified on the basis of vague apprehensions or a failure to cooperate or provide responses to notices.

Conclusion - The respondents' exercise of power under Section 83 was without the requisite formation of opinion based on tangible material, was arbitrary, and violated statutory and constitutional principles. The attachment was therefore quashed, and directions were issued for the immediate de-freezing of the petitioner's bank account.

The impugned order of provisional attachment dated 26 December 2024 set aside - petition allowed.

Tax Connect: 506th Issue 25th May 2025- 31st May 2025





FEMA

CIRCULAR

REPORTING ON FIRMS PORTAL – ISSUANCE OF PARTLY PAID UNITS BY INVESTMENT VEHICLES

OUR COMMENTS: The Chief General Manager, Reserve bank of India, has issued A.P. (DIR Series) Circular No. 06/2025-26 dated 4. The directions contained in this circular have been issued 23.05.2025 circulated that Attention of Authorised Dealer (AD) under sections Category - I banks is invited to the Foreign Exchange Management Act, 1999 (42 of 1999) and are without prejudice Management (Non-debt Instruments) Rules, 2019 (hereinafter to permissions / approvals, if any, required under any other law. referred as 'Rules'), notified by the Central Government on October 17, 2019, which have been amended through the Foreign Exchange Management (Non-debt Instruments) (Second Amendment) Rules, 2024 vide S.O. 1361(E), dated March 14, 2024, enabling issuance of partly paid units to persons resident outside India by investment vehicles. Reference is also invited to Foreign Exchange Management (Mode of Payment and Reporting of Non-Debt Instruments) Regulations, 2019 and A.P. (DIR Series) Circular No. 7 dated May 21, 2024, issued by the Reserve Bank.

2. In terms of Regulation 4(10) of the Foreign Exchange Management (Mode of Payment and Reporting of Non-Debt Instruments) Regulations, 2019, an investment vehicle which has issued its units to a person resident outside India shall file Form InVI within 30 days from the date of issue of units. In this connection, it is advised that investment vehicles may report issuances of partly paid units made prior to the date of this circular in Form InVI within 180 days from the date of this circular. No late submission fees shall be applicable for such reporting made within this period. However, issuances of partly paid units by investment vehicles on or after the date of this circular shall continue to be reported within 30 days, in accordance with the timelines specified under the Foreign Exchange Management (Mode of Payment and Reporting of Non-Debt Instruments) Regulations, 2019.

- 3. These directions will become operative with immediate effect. AD Category-I banks may bring the contents of this circular to the notice of their customers / constituents concerned.
- 10(4) and 11(1) of the Foreign

[For further details please refer the detailed circular]



BCC&i AIDING BUSINESS SINCE 1833

CUSTOMS

NOTIFICATION

SEEKS TO AMEND NOTIFICATION NO. 55/2022-CUSTOMS DATED 31.10.2022 TO REMOVE THE CONDITION REQUIRED FOR AVAILING EXEMPTION ON BANGALORE ROSE ONION

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Notification No. 30/2025-Customs (Tariff) dated 23.05.2025 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. 55/2022-Customs, dated the 31st October 2022, published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i), vide number G.S.R. 796(E), dated the 31st October 2022, namely:-

In the said notification, in the TABLE, against Sl. No. 1., in column (5), for the entry, the entry "-" shall be substituted.

[For further details please refer the Notification]

NOTIFICATION

AMENDMENT IN THE NOTIFICATION NO. 63-1994-CUSTOMS (N.T) DATED 21.11.1994 IN RESPECT OF LAND CUSTOMS STATION, RAXAUL

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Notification No. 36/2025-Customs (N.T.) dated 23.05.2025 notified that In exercise of the powers conferred by clauses (b) and (c) of sub-section (1) of section 7 of the Customs Act, 1962 (52 of 1962), the Central Board of Indirect Taxes and Customs hereby makes the following further amendments in the notification of the Government of India, Ministry of Finance (Department of Revenue), No. 63/1994-

Customs (N.T.) dated the 21st November, 1994, published in the Gazette of India, Extraordinary, Part II, Section 3, Subsection (ii), vide number S.O. 830 (E), dated the 21st November, 1994, namely: -

In the said notification, in the Table, against serial number 6 relating to land frontier of Nepal, against item (19) in column (3) relating to Raxaul, in column (4), after the entry (c), the following entries shall be inserted, namely: -

(1)	(2)	(3)	(4)
			"(d) Railway line connecting Raxaul in India and
			Birganj in Nepal.".

Explanation: The traffic-in-transit route via rail through Raxaul would be as per Treaty of Transit between India and Nepal dated the 1st June, 2023.

[For further details please refer the Notification]

NOTIFICATION

APPOINTMENT OF COMMON ADJUDICATION AUTHORITY
FOR DE-NOVO ADJUDICATION IN RESPECT OF HUNDRED
PERCENT EXPORT ORIENTED UNDERTAKINGS

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Notification No. 35/2025-Customs (N.T.) dated 16.05.2025 notified that whereas the officers of customs, in whose jurisdiction hundred percent export oriented undertakings (EOU) are located, are appointed as Central Excise Officers and invested with all the powers, to be exercised by them throughout the territory of India, of an officer of Central Excise of the rank specified under serial No. 7 of the notification [No. 38/2001-Central Excise (N.T.)], published in the Gazette of India, Extraordinary, Part II, section 3, sub-section (i) vide number G.S.R. 467(E), dated the 26th June, 2001;



BCC&i AIDING BUSINESS SINCE 1833

CUSTOMS

AND WHEREAS, the jurisdiction exercised by the officers of Central Excise for hundred percent export oriented undertakings has been transferred to the officers of Customs vide notification [No. 52/2003-Customs], published in the Gazette of India, Extraordinary, Part II, section 3, sub-section (i) vide number G.S.R. 274(E), dated the 31st March, 2003 and notification [No. 79/2018-Customs], published in the Gazette of India, Extraordinary, Part II, section 3, sub-section (i) vide number G.S.R. 1176(E), dated the 6th December, 2018;

NOW, THEREFORE, in exercise of the powers conferred by subsection (1) of section 4 read with section 3 and sub-sections (1) and (1A) of section 5 of the Customs Act, 1962(52 of 1962) (hereinafter referred as to as the said Act), the Central Board of Indirect Taxes and Customs, being satisfied that it is necessary so to do, specifies that, where any notice having demand of both customs duty and central excise duty and were originally adjudicated by the Central Excise Officer in terms of rule 3 of the Central Excise Rules, 2002, has been remanded back and is pending for de-novo adjudication in relation to that hundred percent export oriented undertakings, such notice shall stand assigned for the purpose of adjudication under the said Act, in the following manner, namely:-

- (i) notice involving aggregate duty up to rupees five lakhs, by Deputy Commissioner of Customs or Assistant Commissioner of Customs having jurisdiction over such hundred percent export-oriented undertakings unit;
- (ii) notice involving aggregate duty up to rupees fifty lakhs, by Additional Commissioner of Customs or Joint Commissioner of Customs having jurisdiction over such hundred percent exportoriented undertakings unit; and
- (iii) notice involving aggregate duty above rupees fifty lakhs, by Principal Commissioner of Customs or Commissioner of

Customs having jurisdiction over such hundred percent exportoriented undertakings unit.

2. This notification shall come into force on the date of its publication in the Official Gazette.

[For further details please refer the Notification]



DGFT



NOTIFICATION

HARMONISATION OF SCHEDULE-IL (EXPORT POLICY), ITC (HS) 2022 WITH AMENDMENTS INTRODUCED VIDE FINANCE ACT, 2025

OUR COMMENTS: The Ministry of Commerce and Industry vide Notification no. 09/2025-26 dated 19.05.2025 notified that in exercise of the powers conferred by Section 3 read with Section 5 of the Foreign Trade (Development & Regulation) Act 1992, read with Para 1.02 and 2.01 of the Foreign Trade Policy 2023, as amended from time to time, the Central Government hereby amends Schedule-II (Export Policy), ITC (HS) 2022, in sync with the Finance Act, 2025 dated March 29, 2025.

- 2. The List of ITC (HS) codes introduced/deleted/amended/split/merged as per Finance Act, 2025 are annexed herewith (Annexure-I).
- 3. The modifications/amendments in the Section Notes, Chapter-wise Main Notes, Sub-Heading Notes and Supplementary Notes as per the Finance Act, 2025 are annexed herewith (Annexure-II).
- 4. The updated ITC (HS) shall be available on the website of DGFT (https://dgft.gov.in).

Effect of this Notification: Schedule-II (Export Policy), ITC (HS) 2022 is amended in sync with the Finance Act, 2025. This shall come into force with immediate effect.

[For further details please refer the Notification]

NOTIFICATION

AMENDMENT IN IMPORT POLICY AND POLICY CONDITIONS OF SPECIFIC ITC (HS) CODES UNDER CHAPTER 71 OF SCHEDULE -I(IMPORT POLICY) OF ITC (HS) 2022 IN SYNC WITH THE FINANCE ACT 2025

OUR COMMENTS: The Ministry of Commerce and Industry vide Notification no. 08/2025-26 dated 19.05.2025 notified that in exercise of powers conferred by Section 3 read with 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, the Central Government hereby amends the Import Policy and Policy Condition of specific ITC (HS) codes under Chapter 71 of Schedule -I (Import Policy) of ITC (HS) 2022 in sync with the Finance Act 2025 dated 29.03.2025, with immediate effect.

2. In Chapter 71, ITC (HS) 2022, Schedule-I (Import Policy), the details of the ITC(HS) codes that have been deleted and the Import Policy and Policy Conditions against the newly created ITC(HS) codes is notified as under:

ITC(HS)	Item	Import	Policy	Policy
Code	Description			Condition
7106	Silver (incl	_	-	_
	platinum), un	_		
	for	ms, or in p	owder for	m.
710691		Other : U	nwrought	
71069120	Containing	Restr	ricted	Import is
	99.9 per cent.			allowed only
	or more by			through
	weight of			nominated
	silver			agencies as
				notified by
				RBI (in case of
				banks), DGFT
				(for other
				agencies) and
				by qualified
				jewellers as
				notified by
				the IFSCA for
				import
				through India
				International Bullion
				Exchange
				(IIBX).
710692	Otho	er : Semi-	manufact	
	_	Dele		
71069220	Bar			C. L. C. L. D. D.
71069221	Bar:	Fr	ee	Subject to RBI
	Containing			Regulations.
	99.9 percent			
	or more by			
	weight of silver			
74060220				C. Idania I. B. B.
/1069229	Bar Other	Fr	ee	Subject to RBI
				Regulations.
7108	Gold (inclu			•
	unwrought or			ea forms, or in
710812		powde		mc:
		Other unwr	ought 1011	113.
71081200	-Non-	Deleted		
	monetary:			
	Other			
	unwrought forms			
	1011115			

Tax Connect: 506th Issue 25th May 2025 – 31st May 2025



BCC&i

DGFT

71081210	Containing 99.5 per cent.	Restricted	1. Import is allowed through:
	or more by weight of gold		(i) Nominated agencies as notified by RBI (in case of banks) or nominated agencies notified DGFT (for other agencies)
			(ii) Qualified Jewellers (as notified by IFSCA) through India International Bullion Exchange (IIBX);
			2. Valid India-UAE TRQ holders as notified by IFSCA can import gold through IIBX against the TRQ and can obtain physical delivery of the same through IFSCA registered vaults located in SEZs as per the guidelines prescribed by the IFSCA
71081290	Other	Restricted	
			(i) Nominated agencies as notified by RBI (in case of banks) or nominated agencies notified DGFT (for other agencies)
			(ii) Qualified Jewellers (as notified by IFSCA) through India International Bullion Exchange (IIBX);
			2. Valid India-UAE TRQ holders as notified by IFSCA can import gold through IIBX against the TRQ and can obtain physical delivery of the same through IFSCA registered vaults located in SEZs as per

			_	uidelines I by the IFSCA.	
			imported	Dore can be by refineries	
			license wi	an import th Actual User condition.	
740043	041	 •	. ,		
710813			nufactured	torms:	
71081300	-Non- monetary: Other semi- manufactured forms	Deleted			
71081310	Containing 99.5 per cent. or more by weight of gold	Restricted	Import is allowed only through nominated agencies as notified by RBI (in case of banks) and DGFT (for other agencies)		
71081390	Other	Restricted	Import is allowed only through nominated agencies as notified by RBI (in case of banks) and DGFT (for other agencies)		
7110	Platinum, un	wrought o	r in semi m	anufactured	
			owder for		
711011	Platinum: -	- Unwroug	ht or in po	wder form	
71101110	Unwroug	ht form	Deleted		
71101111	Unwrough Containing 99. or more by v platinu	0 per cent veight of	Free	-	
71101119	Unwrough Othe		Restricted	-	
71101120	In powd	er form	Deleted		
71101121	In powder Containing 9 cent. or more of platir	99.0 per by weight	Free	-	
71101129	othe	r	Restricted	-	
711019	Othe				
71101900			Deleted		
71101910	Containing cent. or more of platir	by weight	Free	-	
71101990	Oth	er	Restricted		



BCC&i

DGFT

Effect of the Notification:

The Import Policy of the ITC(HS) codes under Chapter 71 of ITC (HS) 2022, Schedule-I (Import Policy), newly created under the Finance Act, 2025 dated 29.03.2025, is notified with immediate effect.

This is issued with the approval of Minister of Commerce & Industry.

[For further details please refer the Notification]

NOTIFICATION

PORT RESTRICTION ON IMPORT OF CERTAIN GOODS FROM BANGLADESH TO INDIA - INSERTION OF A NEW PARA 19 UNDER 'GENERAL NOTES REGARDING IMPORT POLICY' UNDER ITC (HS), 2022 SCHEDULE 1 (IMPORT POLICY)

OUR COMMENTS: The Ministry of Commerce and Industry vide Notification no. 07/2025-26 dated 17.05.2025 notified that in exercise of powers conferred by Section 3 read with 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, the Central Government hereby introduces a new Para 19 to General Notes Regarding Import Policy under ITC (HS), 2022 Schedule 1 (Import Policy) with immediate effect.

- "19. The import of following goods from Bangladesh to India shall be regulated as under:
- 1. Port Restrictions on import of Goods from Bangladesh

SI. No.	Item Description	Import Policy /Port restriction
(i)	All HS codes of Ready-Made Garments (RMG)	Import from Bangladesh shall not be allowed from any land port; however, it is allowed only through Nhava Sheva and Kolkata seaports.
(ii)	Fruit/ Fruit flavoured and Carbonated Drinks	Imports from Bangladesh shall not be allowed through any LCSs/ICPs in Assam, Meghalaya, Tripura and Mizoram; and LCS Changrabandha and Fulbari, in West Bengal.
(iii)	Processed food items (Baked goods, Snacks, Chips and Confectionery)	
(iv)	Cotton and Cotton Yarn Waste.	

- (v) Plastic and PVC
 finished goods,
 except pigments,
 dyes, plasticisers and
 granules that form
 input for own
 industries.

 (vi) Wooden Furniture
- 2. The above restrictions at Para 1 shall not apply to import of Fish, LPG, Edible Oil, and Crushed stone to India from Bangladesh
- 3. The above restrictions at Para 1 shall also not apply to Bangladesh exports to Nepal/Bhutan transiting through India."

Effect of the Notification:

A new Para 19 is introduced in 'General Notes Regarding Import Policy' under ITC (HS), 2022 Schedule 1 (Import Policy) regulating the Import of certain goods from Bangladesh to India, with immediate effect.

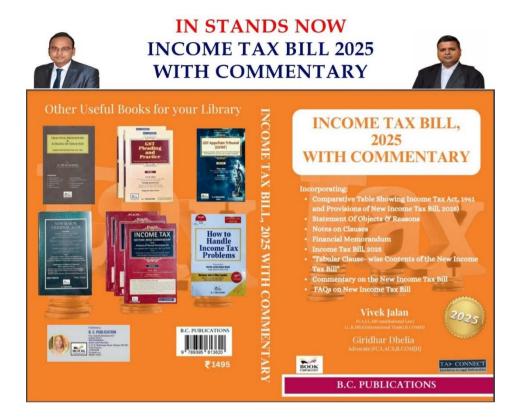
This is issued with the approval of Minister of Commerce & Industry.

[For further details please refer the Notification]

Tax Connect: 506th Issue 25th May 2025 – 31st May 2025







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

 $Website: \underline{www.bookcorporation.com}\\$

In Association With: TAX CONNECT ACADEMY

6, Netaji Subhas Road, Kolkata 700001

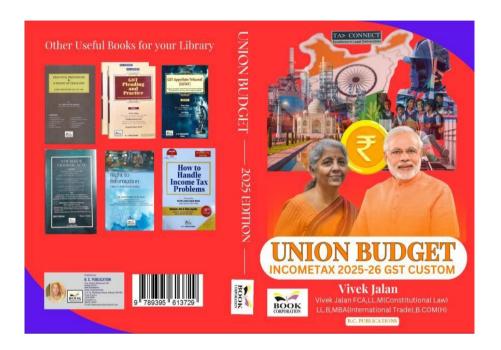
Cell: 7003384915

Order by email: info@taxconnect.co.in
Website: www.taxconnect.co.in





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

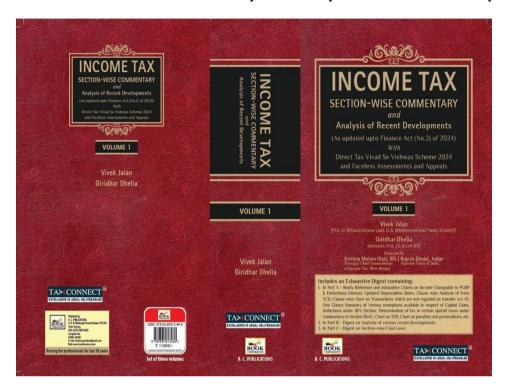
Order by email: info@taxconnect.co.in

 $Website: \underline{www.taxconnect.co.in}$





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

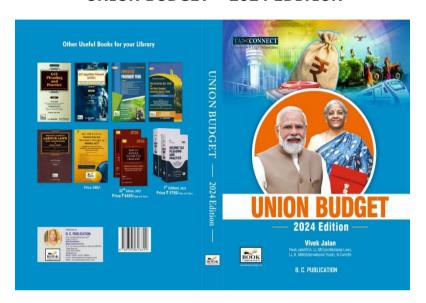
Order by email: info@taxconnect.co.in

Website: www.taxconnect.co.in





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

 $Website \ \underline{www.bookcorporation.com}$

In Association With:

TAX CONNECT ACADEMY

6, Netaji Subhas Road, Kolkata 700001 Cell: 7003384915

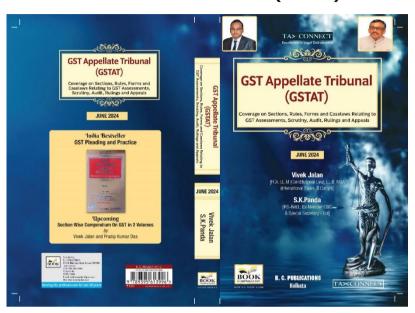
Order by email: info@taxconnect.co.in

Website: www.taxconnect.co.in





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





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

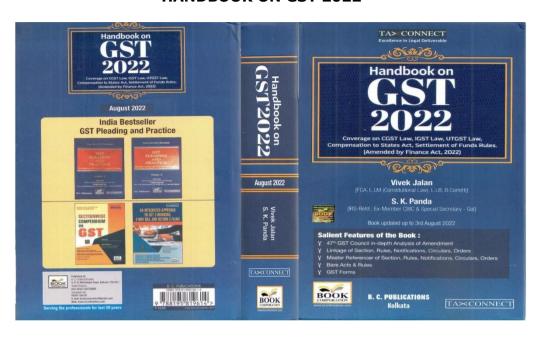
Website: www.taxconnect.co.in

Tax Connect: 506th Issue 25th May 2025 – 31st May 2025





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

DI (000) 645

Phones: (033) 64547999

 $Cell:\,9830010297,\,9331018333$

Order by email: $\underline{bookcorporation@gmail.com}$

 $Website: \underline{www.bookcorporation.com}$

In Association With:

TAX CONNECT ACADEMY

6, Netaji Subhas Road, Kolkata 700001 Cell: 7003384915

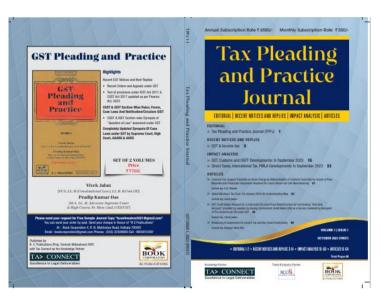
Order by email: info@taxconnect.co.in

Website: www.taxconnect.co.in





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

 $Website: \underline{www.bookcorporation.com}$

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





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

Tax Connect: 506th Issue 25th May 2025 – 31st May 2025





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@t axconnectwest.co.in



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

Contact Person: Anil Pal

Email:anil.pal@taxconnect delhi.co.in

DELHI (NCR)

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

Contact Person: Poonam Khemka

Email:poonam.khemka@taxc onnect.co.in



KOLKATA

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

Contact Person: Sandeep Mandal

Email:sandeep.mandal@taxconnect.co.in



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@taxconne ct.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.