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Annual Returns – GST**Index**

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Chapter 1

Introduction to Annual Returns

It is recommended that the reader refer Form GSTR 9 as well as the Technical Guide to Annual Returns and GST Audit (ICAI). This booklet purports to present the relevant material for Form GSTR 9 in a summarized form. For in-depth analysis and cross referencing, one should refer to the Technical Guide to Annual Return and GST Audit (ICAI).

The Introduction of Goods and Services Tax was a revolutionary move in the context of commodities and services tax. It has brought about a paradigm shift in the methodology of levy and collection of taxes. It is an internationally recognized multipoint tax system providing for levy of tax on goods as well as services on the value addition occurring at every stage of business activity with the availability of cross credits (services credit for goods & vice versa). On a macro note it may be said that GST is a mechanism which supports self-compliance where in the assessee assess the taxes payable by them. To ensure the correctness and veracity of the reported information annual returns and GST audit are required. It becomes essential to have counter checks and balances to ensure that there is no seepage of exchequer's revenue. GST principles embrace information technology and reduce the interaction with the tax administrators. The responsibility has been given to the Chartered Accountants and cost accountants for performing the audit functions considering their expertise in the arena.

GST law needs all entities who are registered to the initial mechanism of returns required the filing of the following for a regular registered person.

1. GSTR 1 – Furnishing of Details of Outward Supplies (Section 37)
2. GSTR 2 – Furnishing of Details of Inward Supplies (Section 38) (dispensed with from August 2017 onwards)
3. GSTR 3 – Furnishing of the returns (Section 39) (was envisaged but has not been introduced since beginning)

However, GSTR 3B was introduced by virtue of Sub Rule 5 of Rule 61 owing to the postponement of GSTR 2 and 3.

In case of a Composition Registered Person GSTR 4 is the prescribed return.

Further the concept of Annual returns has been effectuated under GST. Although the concept of Annual return was in vogue by virtue of VAT Statutes in certain states, the same wasn't there in the Service Tax Statute as well as the Excise Law.

Legal provisions of GST Annual Returns

In order to understand the gamut of the GST Annual returns and its requirement, it would be relevant for us to understand the legal provisions relevant for GST Annual Returns. Two important provisions which are relevant and important in this context are Section 35(5) and Section 44(1) of CGST Act, 2017.

In terms of section **35(5)** "every registered person whose turnover during a financial year exceeds the prescribed limit shall get his accounts audited by a chartered accountant or a cost accountant

and shall submit a copy of the audited annual accounts, the reconciliation statement under sub-section (2) of section 44 and such other documents in such form and manner as may be prescribed”.

Section 44(1) requires that every registered person, other than an Input Service Distributor, a person paying tax under section 51 or section 52, a casual taxable person and a non-resident taxable person, shall furnish an annual return for every financial year electronically in such form and manner as may be prescribed on or before the thirty-first day of December following the end of such financial year. This form is notified by the government vide Notification 39/2018 on 4th September 2018.

In terms of Rule 80(1) of the CGST Rules, 2017 “Every registered person, other than an Input Service Distributor, a person paying tax under section 51 or section 52, a casual taxable person and a non-resident taxable person, shall furnish an annual return as specified under sub-section (1) of section 44 electronically in FORM GSTR-9 through the common portal either directly or through a Facilitation Centre notified by the Commissioner:

Provided that a person paying tax under section 10 shall furnish the annual return in FORM GSTR-9A.”

Further, Section 44(2) mandates every registered person who is required to get his accounts audited in accordance with Section 35(5) to furnish the copy of audited annual accounts and a reconciliation statement reconciling the value of supplies declared in the annual return with such audited annual financial statements.

In terms of Section 44(2), Rule 80(3) requires every registered person whose aggregate turnover during a financial year exceeds two crore rupees shall get his accounts audited as specified under sub-section (5) of section 35 and he shall furnish a copy of audited annual accounts and a reconciliation statement, duly certified, in FORM GSTR-9C, electronically through the common portal either directly or through a Facilitation Centre notified by the Commissioner.

Points to Note on Annual Returns

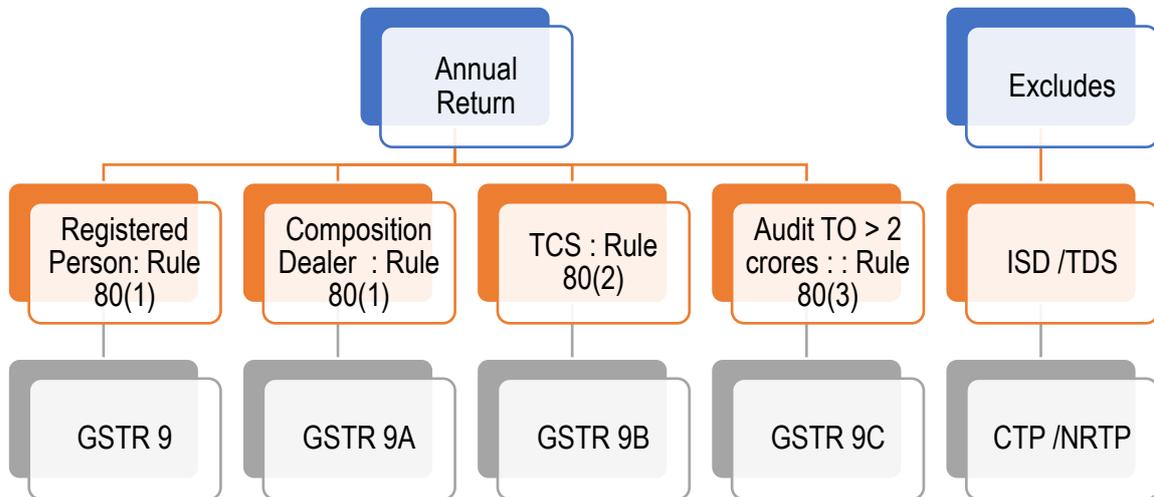
1. Every registered person is required to file annual return on or before 31st December of the year succeeding the financial year in form GSTR-9. Example – For F.Y 2017-18 annual return would be filed on 31st December 2018
2. Person paying tax under composition scheme is required to file annual return in form GSTR-9A – Proviso to Sub Rule (1) of Rule 80.
3. Every electronic commerce operator who is required to collect tax at source under section 52 shall furnish annual statement in form GSTR - 9B – Sub Rule 2 of Rule 80.
4. Nil Annual Return- A person registered under GST but having no transactions during the year is still required to file a Nil Annual Return. A person who has got his registration cancelled during the year is also required to file the respective Annual returns.
5. A Registered person who has opted in or opted out of composition is required to file both GSTR 9 & GSTR 9A for the relevant periods.
6. The exceptions to filing of the Annual return applies to the following category of registered persons

- Input Service Distributor
- A person required to deduct TDS
- Casual Taxable Person
- Non-Resident Taxable Person

In case of the regular registered persons whose aggregate turnover exceeds Rs. 2Crore, they are required to furnish the following

- GSTR 9 - The Annual Return
- Audited Annual Accounts
- GSTR 9C – A reconciliation statement mapping the annual returns Vs. the Audited Annual Accounts.

Summary



Consequences of failure to submit the annual return and not getting the accounts audited

1. Notice to defaulters

Section 46 of the CGST Act provides where a registered person fails to furnish a return under section 39 or section 44 or section 45, a notice shall be issued requiring him to furnish such return within fifteen days in such form and manner as may be prescribed.

2. Late Fee for delayed filing -

Section 47(2) of the CGST Act provides for levy of a late fee of Rs. 100/- per day for delay in furnishing annual return in Form GSTR 9, subject to a maximum amount of quarter percent (0.25%) of the turnover in the State or Union Territory. Similar provisions for levy of late fee exist under the State / Union Territory GST Act, 2017.

On a combined reading of Section 47(2) and Section 44 (1) of the CGST Act, 2017 and State / Union Territory GST Act, 2017 a late fee of Rs.200/- per day (Rs. 100 under CGST law +Rs. 100/- under State / Union Territory GST law) could be levied which would be capped to a maximum

amount of half percent (0.25% under the CGST Law + 0.25% under the SGST / UTGST Law) of turnover in the State or Union Territory.

3. General Penalty for Contravention of Provisions –

Any person, who contravenes any of the provisions of this Act or any rules made there under for which no penalty is separately provided for in this Act, shall be liable to a penalty which may extend to twenty-five thousand rupees. An equal amount of penalty under the SGST/UTGST Act would also be applicable. To sum up a penalty of up to Rs.50,000/- could be levied.

4. Conclusion

The GST Annual Return being mandatory it would be pertinent to understand the various elements of the Form. In order to assist the readers in filling the form a detailed analysis of the form is presented in the ensuing chapters.

Background for preparing Form GSTR 9

Let us examine the provisions of CGST Act 2017 to understand what constitutes returns under the Act,

- Section 37 read with Rule 59 provides for furnishing details of outward supplies in form GSTR 1.
- Section 38 read with Rule 60 provides for furnishing details of inward supplies in form GSTR 2.
- Section 39 read with Rule 61 provides for Furnishing of returns one of which is GSTR 3.

Sub Rule 5 of Rule 61 : Where the time limit for furnishing of details in **FORM GSTR-1** under section 37 and in **FORM GSTR-2** under section 38 has been extended and the circumstances so warrant, the Commissioner may, by notification, specify the manner and conditions subject to which the return shall be furnished in **FORM GSTR-3B** electronically through the common portal, either directly or through a Facilitation Centre notified by the Commissioner.

GSTR 9 attempts to capture all the relevant transactions of the Registered Person for the relevant Financial year. From the headings and instructions given in the form, the Annual return merely summarizes the data for the relevant financial year based on the disclosure made in the relevant Form GSTR 1 and Form GSTR 3B. The data to be filled up in the annual return should be done on 'as is' basis. This means that even if one realizes that the data fed in the returns are incorrect, still that same data is to be taken for reporting in annual return. The actual data present in the financial statements and the books of accounts of the entity filling up the annual return is not to be considered at all for the purpose of reporting in annual return. So, the intent of the form is not to allow rectification of data filed in the monthly returns but only aggregation of such data in respect of the financial year.

The instructions of the form state that the information of outward supplies 'may' be derived from Form GSTR 1. Whether the word 'may' is to be read as 'shall' can be a matter of opinion. Some of the experts are of the view that the information breakup required in the Form GSTR 9 and the instructions point to the direction that only Form GSTR 1 can be used for filling such information. The other school of thought opines that the outward supplies are to be taken from Form GSTR 3B. This booklet has been drafted with the underlying belief that outward supplies and tax payable in the annual return are to be extracted from Form GSTR 1 only.

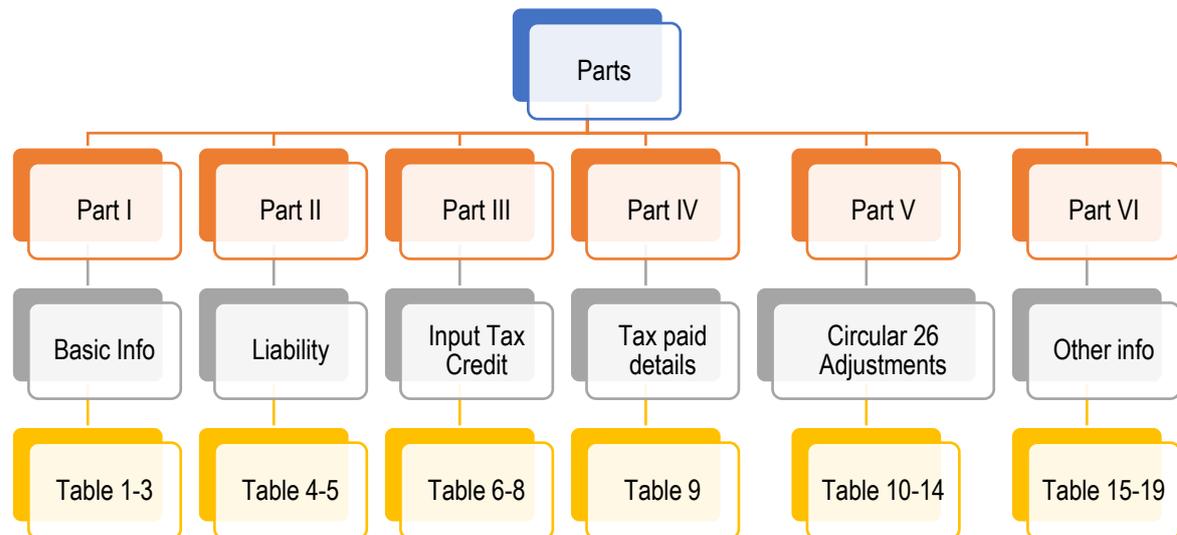
Inward supplies, input tax credit and the net tax paid in cash are to be gathered from Form GSTR 3B. It seems that the inherent assumption that has been taken while drafting the form is that Form GSTR 3B and Form GSTR 1 are in consonance with each other which may not be always true. In case the values as per Form GSTR 3B and GSTR 1 are not matching with each other, one may arrive at a different value of tax payable and tax paid as per the filled up annual return. A clarification may be expected from the government regarding the manner of payment of any additional liability (if any). However, if one faces such a situation, then the additional tax liability may be decided to be paid through Form GSTR 3B/Form DRC-03.

The broad elements of the Annual Return Form GSTR 9 is as below –

- Parts- I to VI
- Tables – 1 to 19
- Instructions 1 to 6

Value to report:

1. Total Liability = Table 4 + Table 10 – Table 11
2. Total Tax Payment = Table 9 + Table 14
3. Input Tax Credit = Table 6-Table 7



Chapter 3

GSTR-9 as Notified

The Following is the form notified vide 39/2018. The corresponding instructions have been appended along with for the ease of reference.

“FORM GSTR-9 (See rule 80) Annual Return						
Pt. I	Basic Details					
1	Financial Year					
2	GSTIN					
3A	Legal Name					
3B	Trade Name (if any)					
Pt. II	Details of Outward and inward supplies declared during the financial year					
	(Amount in ₹ in all tables)					
	Nature of Supplies	Taxable Value	Central Tax	State Tax / UT Tax	Integrated Tax	Cess
	1	2	3	4	5	6
4	Details of advances, inward and outward supplies on which tax is payable as declared in returns filed during the financial year					
A	Supplies made to un-registered persons (B2C)	Aggregate value of supplies made to consumers and unregistered persons on which tax has been paid shall be declared here. These would include details of supplies made through E-Commerce operators and are to be declared as net of credit notes or debit notes issued in this regard. Table 5, Table 7 along with respective amendments in Table 9 and Table 10 of FORM GSTR-1 may be used for filling up these details.				
B	Supplies made to registered persons (B2B)	Aggregate value of supplies made to registered persons (including supplies made to UINs) on which tax has been paid shall be declared here. These would include supplies made through E-Commerce operators but shall not include supplies on which tax is to be paid by the recipient on reverse charge basis. Details of debit and credit notes are to be mentioned separately. Table 4A and Table 4C of				

		FORM GSTR-1 may be used for filling up these details.
C	Zero rated supply (Export) on payment of tax (except supplies to SEZs)	Aggregate value of exports (except supplies to SEZs) on which tax has been paid shall be declared here. Table 6A of FORM GSTR-1 may be used for filling up these details.
D	Supply to SEZs on payment of tax	Aggregate value of supplies to SEZs on which tax has been paid shall be declared here. Table 6B of GSTR-1 may be used for filling up these details.
E	Deemed Exports	Aggregate value of supplies in the nature of deemed exports on which tax has been paid shall be declared here. Table 6C of FORM GSTR-1 may be used for filling up these details.
F	Advances on which tax has been paid but invoice has not been issued (not covered under (A) to (E) above)	Details of all unadjusted advances i.e. advance has been received and tax has been paid but invoice has not been issued in the current year shall be declared here. Table 11A of FORM GSTR-1 may be used for filling up these details.
G	Inward supplies on which tax is to be paid on reverse charge basis	This would include invoices and debit notes on which tax is to be paid by the recipient (i.e. by the person filing the annual return) on reverse charge basis. This shall include supplies received from registered persons, unregistered persons on which tax is levied on reverse charge basis. This shall also include aggregate value of all import of services. Table 3.1(d) of FORM GSTR-3B may be used for filling up these details.
H	Sub-total (A to G above)	
I	Credit Notes issued in respect of transactions specified in (B) to (E) above (-)	Aggregate value of credit notes issued in respect of B to B supplies (4B), exports (4C), supplies to SEZs (4D) and deemed exports (4E) shall be declared here. Table 9B of FORM GSTR-1 may be used for filling up these details.
J	Debit Notes issued in respect of transactions specified in (B) to (E) above (+)	Aggregate value of debit notes issued in respect of B to B supplies (4B), exports (4C), supplies to SEZs (4D) and deemed exports (4E) shall be declared here. Table 9B of FORM GSTR-1 may be used for filling up these details.
K	Supplies / tax declared through Amendments (+)	Details of amendments made to B to B supplies (4B), exports (4C), supplies to SEZs (4D) and deemed exports (4E), credit notes (4I), debit notes (4J) and Refund vouchers shall be declared here. Table 9A and Table 9C of FORM GSTR-1 may be used for filling up these details.
L	Supplies / tax reduced through Amendments (-)	
M	Sub-total (I to L above)	
N	Supplies and advances on which tax is to be paid (H +	

	M) above				
5	Details of Outward supplies on which tax is not payable as declared in returns filed during the financial year				
A	Zero rated supply (Export) without payment of tax	Aggregate value of exports (except supplies to SEZs) on which tax has not been Paid shall be declared here. Table 6A of FORM GSTR-1 may be used for filling up these details.			
B	Supply to SEZs without payment of tax	Aggregate value of supplies to SEZs on which tax has not been paid shall be Declared here. Table 6B of GSTR-1 may be used for filling up these details			
C	Supplies on which tax is to be paid by the recipient on reverse charge basis	Aggregate value of supplies made to registered persons on which tax is payable by the recipient on reverse charge basis. Details of debit and credit notes are to be mentioned separately. Table 4B of FORM GSTR-1 may be used for filling up these details.			
D	Exempted	Aggregate value of exempted, Nil Rated and Non-GST supplies shall be Declared here. Table 8 of FORM GSTR-1 may be used for filling up these details. The value of "no supply" shall also be declared here.			
E	Nil Rated				
F	Non-GST supply				
G	Sub-total (A to F above)				
H	Credit Notes issued in respect of transactions specified in A to F above (-)	Aggregate value of credit notes issued in respect of supplies declared in 5A,5B,5C, 5D, 5E and 5F shall be declared here. Table 9B of FORM GSTR-1 may be used for filling up these details.			
I	Debit Notes issued in respect of transactions specified in A to F above (+)	Aggregate value of debit notes issued in respect of supplies declared in 5A,5B,5C, 5D, 5E and 5F shall be declared here. Table 9B of FORM GSTR-1 may be used for filling up these details.			
J	Supplies declared through Amendments (+)	Details of amendments made to exports (except supplies to SEZs) and supplies to SEZs on which tax has not been paid shall be declared here. Table 9A and Table 9C of FORM GSTR-1 may be used for filling up these details.			
K	Supplies reduced through Amendments (-)				
L	Sub-Total (H to K above)				
M	Turnover on which tax is not to be paid (G + L above)				
N	Total Turnover (including advances) (4N + 5M - 4G)	Total turnover including the sum of all the supplies (with additional supplies			

	above)	and amendments) on which tax is payable and tax is not payable shall be Declared here. This shall also include amount of advances on which tax is paid but invoices have not been issued in the current year. However, this shall not include the aggregate value of inward supplies on which tax is paid by the recipient (i.e. by the person filing the annual return) on reverse charge basis				
Pt. III	Details of ITC as declared in returns filed during the financial year					
	Description	Type	Central Tax	State Tax /	Integrated Tax	Cess
				UT Tax		
	1	2	3	4	5	6
6	Details of ITC availed as declared in returns filed during the financial year					
A	Total amount of input tax credit availed through FORM GSTR-3B (sum total of Table 4A of FORM GSTR-3B)		Total input tax credit availed in Table 4A of FORM GSTR-3B for the taxpayer Would be auto-populated here.			
B	Inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs)	Inputs	Aggregate value of input tax credit availed on all inward supplies except those on which tax is payable on reverse charge basis but includes supply of services Received from SEZs shall be declared here. It may be noted that the total ITC Availed is to be classified as ITC on inputs, capital goods and input services. Table 4(A)(5) of FORM GSTR-3B may be used for filling up these details. This shall not include ITC which was availed, reversed and then reclaimed in the ITC ledger. This is to be declared separately under 6(H) below.			
		Capital Goods				
		Input Services				
C	Inward supplies received from unregistered persons liable to reverse charge (other than B above) on which tax is paid & ITC availed	Inputs	Aggregate value of input tax credit availed on all inward supplies received from unregistered persons (other than import of services) on which tax is payable on Reverse charge basis shall be declared here. It may be noted that the total ITC			
		Capital Goods				
		Input Services				

			<p>Availed is to be classified as ITC on inputs, capital goods and input services.</p> <p>Table 4(A)(3) of FORM GSTR-3B may be used for filling up these details</p>		
D	Inward supplies received from registered persons liable to reverse charge (other than B above) on which tax is paid and ITC availed	Inputs	<p>Aggregate value of input tax credit availed on all inward supplies received from registered persons on which tax is payable on reverse charge basis shall be Declared here. It may be noted that the total ITC availed is to be classified as ITC on inputs, capital goods and input services. Table 4(A)(3) of FORM GSTR- 3B may be used for filling up these details</p>		
		Capital Goods			
		Input Services			
E	Import of goods (including supplies from SEZs)	Inputs			<p>Details of input tax credit availed on import of goods including supply of goods</p> <p>Received from SEZs shall be declared here. It may be noted that the total ITC</p> <p>Availed is to be classified as ITC on inputs and capital goods. Table 4(A)(1) of FORM GSTR-3B may be used for filling up these details.</p>
		Capital Goods			
F	Import of services (excluding inward supplies from SEZs)				<p>Details of input tax credit availed on import of services (excluding inward Supplies from SEZs) shall be</p>

				declared here. Table 4(A)(2) of FORM GSTR-3B may be used for filling up these details.
G	Input Tax credit received from ISD	Aggregate value of input tax credit received from input service distributor shall be declared here. Table 4(A)(4) of FORM GSTR-3B may be used for filling up These details.		
H	Amount of ITC reclaimed (other than B above) under the provisions of the Act	Aggregate value of input tax credit availed, reversed and reclaimed under the provisions of the Act shall be declared here		
I	Sub-total (B to H above)			
J	Difference (I - A above)	The difference between the total amount of input tax credit availed through FORM GSTR-3B and input tax credit declared in row B to H shall be declared here. Ideally, this amount should be zero.		
K	Transition Credit through TRAN-I (including revisions if any)	Details of transition credit received in the electronic credit ledger on filing of FORM GST TRAN-I including revision of TRAN-I (whether upwards or Downwards), if any shall be declared here.		
L	Transition Credit through TRAN-II	Details of transition credit received in the electronic credit ledger after filing of FORM GST TRAN-II shall be declared here.		
M	Any other ITC availed but not specified above	Details of ITC availed but not covered in any of heads specified under 6B to 6L Above shall be declared here. Details of ITC availed through FORM ITC01 and FORM ITC-02 in the financial year shall be declared here		
N	Sub-total (K to M above)			
O	Total ITC availed (I + N above)			
7	Details of ITC Reversed and Ineligible ITC as declared in returns filed during the financial year			
A	As per Rule 37	Details of input tax credit reversed due to ineligibility or reversals required Under rule		
B	As per Rule 39			

C	As per Rule 42	37, 39,42 and 43 of the CGST Rules, 2017 shall be declared here. This column should also contain details of any input tax credit reversed under section 17(5) of the CGST Act, 2017 and details of ineligible transition credit claimed under FORM GST TRAN-I or FORM GST TRAN-II and then Subsequently reversed. Table 4(B) of FORM GSTR-3B may be used for filling up these details. Any ITC reversed through FORM ITC -03 shall be declared in 7H.				
D	As per Rule 43					
E	As per section 17(5)					
F	Reversal of TRAN-I credit					
G	Reversal of TRAN-II credit					
H	Other reversals (pl. specify)					
I	Total ITC Reversed (A to H above)					
J	Net ITC Available for Utilization (6O - 7I)					
8	Other ITC related information					
A	ITC as per GSTR-2A (Table 3 & 5 thereof)	The total credit available for inwards supplies (other than imports and inwards supplies liable to reverse charge but includes services received from SEZs) received during 2017-18 and reflected in FORM GSTR-2A (table 3 & 5 only) Shall be auto-populated in this table. This would be the aggregate of all the input tax credit that has been declared by the corresponding suppliers in their FORM GSTR-I.				
B	ITC as per sum total of 6(B) and 6(H) above	The input tax credit as declared in Table 6B and 6H shall be auto-populated here				
C	ITC on inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs) received during 2017-18 but availed during April to September 2018	Aggregate value of input tax credit availed on all inward supplies (except those on which tax is payable on reverse charge basis but includes supply of services received from SEZs) received during July 2017 to March 2018 but credit on Which was availed between April to September 2018 shall be declared here. Table 4(A)(5) of FORM GSTR-3B may be used for filling up these details				
D	Difference [A-(B+C)]					
E	ITC available but not availed (out of D)	Aggregate value of the input tax credit which was available in FORM GSTR2A (table 3 & 5 only) but not availed in any of the FORM GSTR-3B returns shall be Declared here. The credit shall be				
F	ITC available but ineligible (out of D)					

		classified as credit which was available and not Availed or the credit was not availed as the same was ineligible. The sum total of Both the rows should be equal to difference in 8D.					
G	IGST paid on import of goods (including supplies from SEZ)	Aggregate value of IGST paid at the time of imports (including imports from SEZs) during the financial year shall be declared here					
H	IGST credit availed on import of goods (as per 6(E) above)	The input tax credit as declared in Table 6E shall be auto-populated here.					
I	Difference (G-H)						
J	ITC available but not availed on import of goods (Equal to I)						
K	Total ITC to be lapsed in current financial year (E + F + J)	The total input tax credit which shall lapse for the current financial year shall be computed in this row.					
Pt. IV	Details of tax paid as declared in returns filed during the financial year						
9	Description	Tax Payable	Paid through cash	Paid through ITC			
				Central Tax	State Tax / UT Tax	Integrated Tax	Cess
	1	2	3	4	5	6	7
	Integrated Tax						
	Central Tax						
	State/UT Tax						
	Cess						
	Interest						
	Late fee						
	Penalty						
	Other						
Pt. V	Particulars of the transactions for the previous FY declared in returns of April to September of current FY or up to date of filing of annual return of previous FY whichever is earlier						
	Description	Taxable Value	Central Tax	State Tax	Integrated Tax	Cess	

				Tax / UT Tax				
	1	2	3	4	5	6		
10	Supplies / tax declared through Amendments (+) (net of debit notes)	Details of additions or amendments to any of the supplies already declared in the returns of the previous financial year but such amendments were furnished in Table 9A, Table 9B and Table 9C of FORM GSTR-1 of April to September of the current financial year or date of filing of Annual Return for the previous financial year, whichever is earlier shall be declared here						
11	Supplies / tax reduced through Amendments (-) (net of credit notes)							
12	Reversal of ITC availed during previous financial year							
13	ITC availed for the previous financial year	Aggregate value of reversal of ITC which was availed in the previous financial year but reversed in returns filed for the months of April to September of the current financial year or date of filing of Annual Return for previous financial Year, whichever is earlier shall be declared here. Table 4(B) of FORM GSTR- 3B may be used for filling up these details.						
14	Differential tax paid on account of declaration in 10 & 11 above							
	Description	Payable			Paid			
	1	2			3			
	Integrated Tax							
	Central Tax							
	State/UT Tax							
	Cess							
	Interest							
Pt. VI	Other Information							
15	Particulars of Demands and Refunds							
	Details	Centr al	State Tax /	Integrate d Tax	Cess	Interest	Penalty	Late Fee /

		Tax	UT Tax					Others
	1	2	3	4	5			
A	Total Refund claimed	Aggregate value of refunds claimed, sanctioned, rejected and pending for Processing shall be declared here.						
B	Total Refund sanctioned	Refund claimed would be the aggregate value of all the refund claims filed in the financial year and would include refunds which have been sanctioned, rejected or are pending for processing. Refund sanctioned means the aggregate value of all refund sanction orders.						
C	Total Refund Rejected	Refund pending would be the aggregate amount in all refund application for which acknowledgement has been received and would exclude provisional refunds received. These would not include details of non-GST refund claims.						
D	Total Refund Pending							
E	Total demand of taxes	Aggregate value of demands of taxes for which an order confirming the demand Has been issued by the adjudicating authority shall be declared here.						
F	Total taxes paid in respect of E above	Aggregate value of taxes paid out of the total value of confirmed demand as declared in 15E above shall be declared here.						
G	Total demands pending out of E above	Aggregate value of demands pending recovery out of 15E above shall be declared here						
16	Information on supplies received from composition taxpayers, deemed supply under section 143 and goods sent on approval basis							
	Details			Taxable Value	Central Tax	State Tax / UT Tax	Integrated Tax	Ces s
	1			2	3	4	5	6
A	Supplies received from Composition taxpayers			Aggregate value of supplies received from composition taxpayers shall be				

		Declared here. Table 5 of FORM GSTR-3B may be used for filling up these 7Details.						
B	Deemed supply under Section 143	Aggregate value of all deemed supplies from the principal to the job-worker in terms of sub-section (3) and sub-section (4) of Section 143 of the CGST Act shall be declared here.						
C	Goods sent on approval basis but not returned	Aggregate value of all deemed supplies for goods which were sent on approval basis but were not returned to the principal supplier within one eighty days of such supply shall be declared here.						
17	HSN Wise Summary of outward supplies							
HSN Code	UQC	Total Quantity	Taxable Value	Rate of Tax	Central Tax	State Tax / UT Tax	Integrated Tax	Cess
1	2	3	4	5	6	7	8	9
<p>Summary of supplies effected and received against a particular HSN code to be reported only in this table. It would be optional for taxpayers having annual turnover up to ₹ 1.50 Cr. It would be mandatory to report HSN code at two digits level for taxpayers having annual turnover in the preceding year above ₹ 1.50 Cr but up to ₹ 5.00 Cr and at four digits' level for taxpayers having annual turnover above ₹ 5.00 Cr. UQC details to be furnished only for supply of goods.</p> <p>Quantity is to be reported net of returns. Table 12 of FORM GSTR1 may be used for filling up details in Table 17.</p>								
18	HSN Wise Summary of Inward supplies							
HSN Code	UQC	Total Quantity	Taxable Value	Rate of Tax	Central Tax	State Tax / UT Tax	Integrated Tax	Cess
1	2	3	4	5	6	7	8	9
<p>Summary of supplies effected and received against a particular HSN code to be Reported only in this table. It would be optional for taxpayers having annual Turnover up to ₹ 1.50 Cr. It would be mandatory to report HSN code at two digits level for taxpayers having annual turnover in the preceding year above ₹ 1.50 Cr but up to ₹ 5.00 Cr and at four digits' level for taxpayers having annual Turnover above ₹ 5.00 Cr. UQC details to be furnished only for supply of goods.</p> <p>Quantity is to be reported net of returns. Table 12 of FORM GSTR1 may be used for filling up details in Table 17.</p>								
19	Late fee payable and paid							
			Description	Payable	Paid			
			1	2	3			

A	Central Tax			Late fee will be payable if Annual return is filed after the due date.
B	State Tax			

Verification:

I hereby solemnly affirm and declare that the information given herein above is **true and correct** to the best of my knowledge and belief and **nothing has been concealed** there from and in case of any reduction in output tax liability the benefit thereof has been/will be passed on to the recipient of supply.

Signature

Place

Name of Authorised

Signatory

Date

Designation / Status

Chapter 4

Analysis of GSTR-9

Part I: Basic Details

SI No	GSTR 9
GSTR	9
Rule	80(1)
Heading	Annual Return
Pt. 1	Basic Details
1	Financial Year
2	GSTIN
3A	Legal Name
3B	Trade Name (if any)

Part I of the Form GSTR 9 is titled as Basic details has the following 4 tables

Table 1 - Although the form uses the word Financial year, Instruction No. 2 to the form specifies that the details for the period between July 2017 to March 2018 are to be provided in this return.

Table 2 – GSTIN of the person filing the Annual Returns

Table 3A & Table 3B - would be auto populated based on the details provided at the time of registration subject to amendments if any.

Part II: Details of Outward and inward supplies declared during the financial year

Part II of the Form GSTR 9 attempts to capture Information of the Total Turnover (Taxable & Non-Taxable) along with inward supplies where Tax is applicable. We can say this part computes the tax liability. However, this is not the Total Tax Liability, it only captures the tax Liability of the financial year to the extent declared in the returns filed for FY 2017-18. Liability captured based on the returns filed subsequently would be captured in Table 10 and Table 11.

It is required to note that the title to Part II uses the words Details of Outward and inward supplies declared **during** the financial year. If we try to perceive it verbatim, then it may mean that the March 2018 details which are furnished in April 2018 doesn't fall here. However, going by the intent and substance of it we may read the word "**during**" as "**for**" and report those details also in Part II. It has two Sub Tables. So, the underlying presumption would be that the returns filed for the period July 2017 to March 2018 would be used for the purpose of disclosure in this part.

Part II is divided in two broad categories:

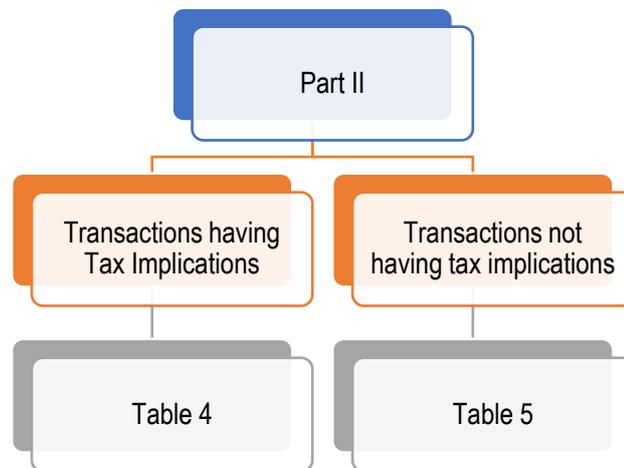
Table 4 - Details of advances, inward and outward supplies on which tax is payable as declared in returns filed (i.e. turnover of all such transactions to be reported where registered person is liable to pay tax)

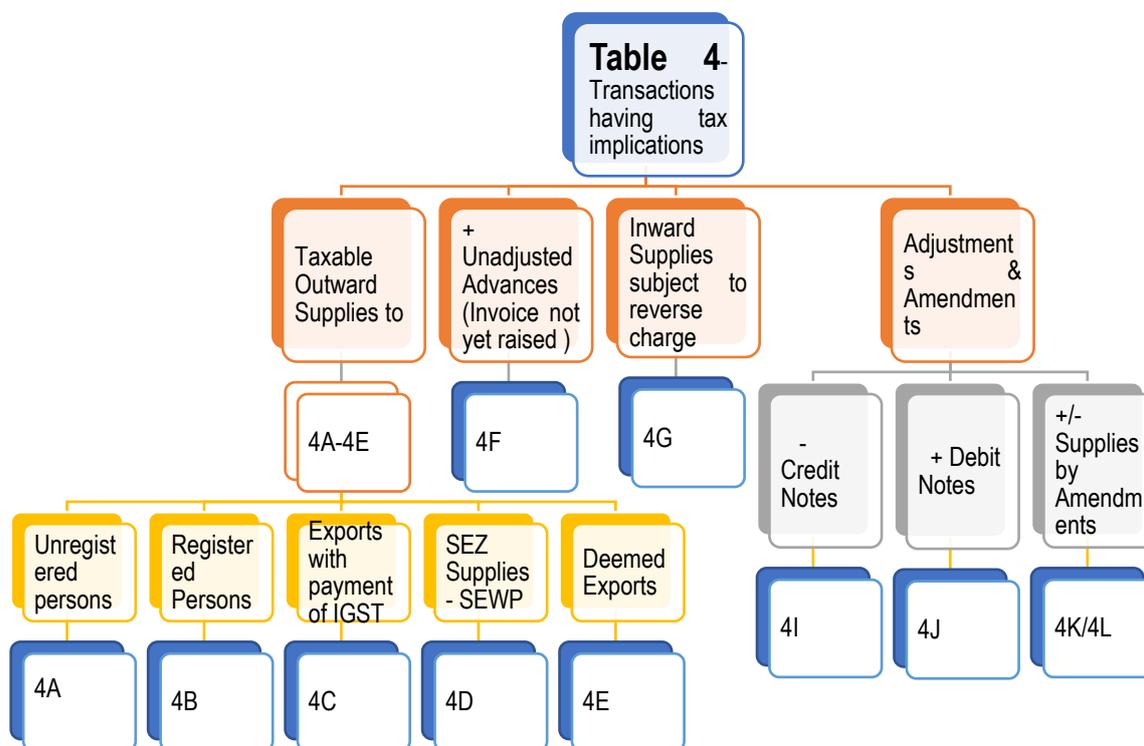
Table 5 - Details of Outward supplies on which tax is not payable as declared in returns filed during the financial year (i.e. all outward supply made by registered person to be reported where there is no liability to pay tax on the registered person)

Instruction No 3 –

Part II consists of the details of all outward supplies & advances received during the financial year for which the annual return is filed. The details filled in Part II is a consolidation of all the supplies declared by the taxpayer in the returns filed during the financial year. Form GSTR 1 is to be taken for filling up Part II in respect of outward supplies. However, the data of inward supplies under reverse charge is to be taken from Form GSTR 3B.

Part II has been segregated based on the transactions having tax implications or otherwise.





*SEWP: SEZ Exports with payment of IGST.

The correlation of disclosure required to be made in Table 4 with the periodical GSTR-1 and GSTR-3B could be understood with the help of following table)

Sl. No	Table of GSTR 9	Description	Table Ref of GSTR 1	Table Ref of GSTR 3B
1.	4A	Supplies made to un-registered persons (B2C)	Table 5 & 7 & respective Amendments in Table 9 & 10 (Net of Credit & Debit Notes)	3.1(a)
2.	4B	Supplies made to registered persons (B2B) other than Debit /Credit Notes	(Table 4A & 4C)	3.1(a)
3.	4C	Zero rated supply (Export) on payment of tax (except supplies to SEZs)	(Table 6A - WPAY)	3.1(b)
4.	4D	Supply to SEZs on payment of tax	(Table 6B- SEWP)	3.1(b)

Sl. No	Table of GSTR 9	Description	Table Ref of GSTR 1	Table Ref of GSTR 3B
5.	4E	Deemed Exports	(Table 6C-DE)	3.1(a)
6.	4F	Advances on which tax has been paid but invoice has not been issued (not covered under (A) to (E) above)	(Table 11A)	3.1(a)
7.	4G	Inward supplies on which tax is to be paid on reverse charge basis	NA	3.1(d)
8.	4H	Sub Total (A to G above)	Auto	Auto
9.	4I	Credit Notes issued in respect of transactions specified in (B) to (E) above (-)	(Table 9B)	3.1(a)
10.	4J	Debit Notes issued in respect of transactions specified in (B) to (E) above (+)	(Table 9B)	3.1(a)
11.	4K	Supplies / tax declared through Amendments (+)	(Table 9A (B2B Invoices) & 9C (Credit Notes /Debit Notes))	3.1(a)
12.	4L	Supplies / tax reduced through Amendments (-)	(Table 9A (B2B Invoices) & 9C (Credit Notes /Debit Notes))	3.1(a)

Understanding 3.1(a) of GSTR 3B which is commonly referred to many other sub tables in Table 4.

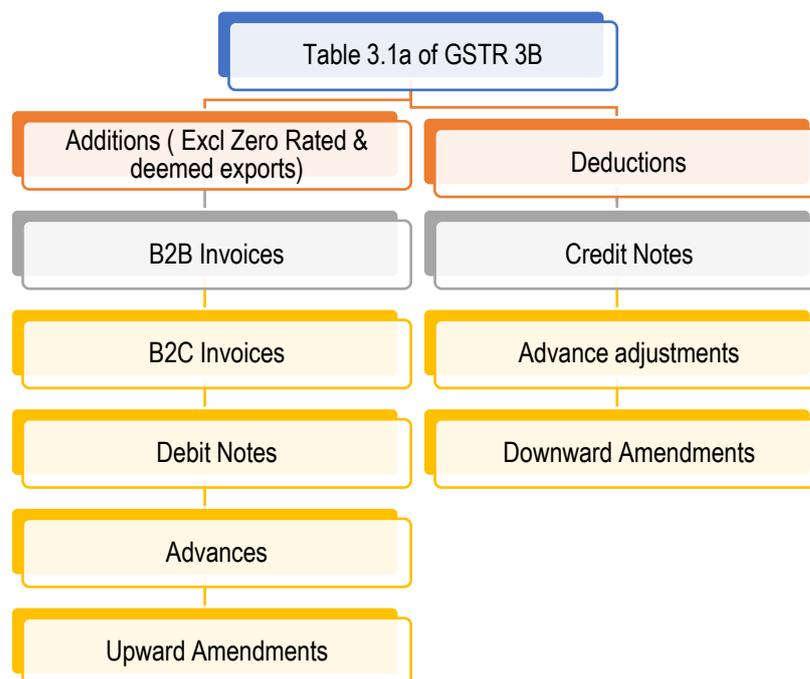


Table 4A - Supplies made to un-registered persons (B2C)

The following could be the possible transaction types to be reported under Table 4A which have been declared in GSTR 3B from July 2017 to March 2018 & on which **tax has been paid**:

1. Supplies made to consumers and unregistered persons directly
2. Supplies made to consumers and unregistered persons through Ecommerce Operators
3. Debit Notes issued to consumers and unregistered (to be added)
4. Credit Notes issued to consumers and unregistered (to be deducted)
5. If the same could be adopted from GSTR 1
 - a. This would include B2C Small (GSTR 1 Table 7) and B2C Large (GSTR 1 Table 5)
 - b. Debit notes / Credit notes issued to above supplies or amendments made via Table 9 and 10 of GSTR 1 should also be considered reporting here.
6. If there are any supplies which are net off with expenses, the same shall be reported at Gross Value

Table 4B Supplies made to registered persons (B2B)

1. All Supplies made to a registered person shall be declared here.
 - a. Inter State
 - b. Intra State
2. In case if the Tax payer is SEZ, then all the supplies of services to DTA and Supply of Goods removed under Bill of entry not by DTA shall be considered here.
3. This disclosure shall be excluding Debit Notes and Credit Notes.

4. Amendments made during the year would be reported separately, hence this would be before amendment value.
5. Outward supplies where the recipient is liable to pay taxes shall NOT be reported here.

Table 4A and 4C of Form GSTR 1 are to be used for filling up this table.

Table 4C Zero rated supply (Export) on payment of tax (except supplies to SEZs)

1. All Direct Export of Goods and Export of services made with payment of taxes shall be reported here.
2. Supplies made without payment of tax shall not be considered here, since there would be no tax impact on these supplies.
3. Debit Notes and Credit Notes for these Supplies shall not be included.
4. Likewise, amendments made shall not be included.

To the extent of 'exports on payment of tax', Table 6A of Form GSTR 1 are to be used for reporting under this table of annual return.

Table 4D Supply to SEZs on payment of tax

1. All supplies (Goods, services or both) made to SEZ unit or SEZ Developer shall be reported here.
2. Only the supplies to SEZ unit/developer with payment of tax are to be considered here.
3. SEZ Supplies made without payment of tax shall not be considered under this table since this would not create a Tax liability to supplier.
4. Debit Notes and Credit Notes for these Supplies shall not be included.
5. Likewise, amendments made shall not be included.

To the extent of 'supply to SEZs on payment of tax', Table 6B of Form GSTR 1 are to be used for reporting under this table of annual return.

Table 4E – Deemed Exports

1. In this section the sum total of deemed exports made during the financial year need to be filled.
2. Deemed export – refer notification no. 48/2017-CT dated 18.10.2017 – the following supplies would be considered as deemed exports:
 - a. Supply of goods by a registered person against Advance Authorisation
 - b. Supply of capital goods by a registered person against Export Promotion Capital Goods Authorisation
 - c. Supply of goods by a registered person to Export Oriented Unit
 - d. Supply of gold by a bank or Public-Sector Undertaking specified in the notification No. 50/2017-Customs, dated the 30th June 2017 (as amended) against Advance Authorisation
3. Before 18th October 2017, no supplies are to be reported as deemed supplies for the financial year 2017-18

Deemed supplies are to be extracted from Table 6C of Form GSTR 1.

Table 4F – Advance on which tax has been paid but invoice has not been issued (not cover under (A) to (E) above).

1. Taxation on Advances was there from the beginning of GST Regime. However, it was relaxed for Goods vide Notification 40/2017-CT dated Oct 13, 2017 and 66/2017-CT dated Nov 11, 2017
2. As per Section 13, time of Supply for services still arises in case of receipt of advance payment.
3. In this table the sum total of advances received during the financial year under GST regime for which NO invoice has been is raised as on 31st March 2018 Where advances have been received during the year and invoice has also been issued against such advances, the value of advance is not to be disclosed here.
4. Where the advances have been received against exempted/non GST supply, same is not required to be disclosed under this table as it does not entails any tax liability.
5. Advances received pre-GST shall not be considered here.

Table 11A of GSTR 1 can be used for this purpose provided the said advance received in 11A has not been adjusted against the invoice issued as disclosed under Table 11B. In effect, Table 11A – 11B is to be used for the purpose of reporting under this table of the annual return.

Table 4G - Inward supplies on which tax is to be paid on reverse charge basis

1. This is not an outward supply, hence there would not be any linkage to table in GSTR 1.
2. However, this is reported in GSTR 3B in Table 3.1(d)
3. The following types of supplies to be included here:
 - a. Supplies received from specified persons – GST is required to be paid by the recipient under reverse charge under Section 9(3) of the CGST Act,2017
 - i. Notification no 4/2017 –Central tax (rate): specifies supply of **goods** on which RCM (Reverse Charge Mechanism) is applicable
 - ii. Notification no. 13/2017-Central tax (rate): specifies **9 services** in respect of which tax is payable on reverse charge.
 - b. Supplies received from unregistered person under Section 9(4) on which reverse charge was paid (as applicable till 13.10.2017)
 - c. Import of services
4. A caution to be exercised IGST paid on Import of Goods not to be reported here to avoid double counting of the liability

Table 4I - Credit Notes issued in respect of transactions specified in (B) to (E) above (-)

1. This value would be reduced from the above declared supplies value.
2. Credit notes issued for B2C Supplies would not be reflected here.

3. In GSTR 1, Credit notes for B2CS is reflected net of Turnover in Table 7 itself. Since, there are reported in Table 4A itself, they would not be reported again under this table of the annual return.
4. Similarly, Credit note for B2CL is reflected in table 9 of GSTR 1. Since, there are reported in Table 4A itself, they will not be reported again under this table of the annual return.
5. All other credit notes apart from those in respect of B2C will be reported here provided the GST has been shown in such credit note.
6. Also, the credit notes issued for B2B transactions where GST is not applicable i.e. CR notes not complying with Sec 34(1) is not to be included. These are otherwise called as Financial or Accounting Credit notes.
7. Information to be reported in this table is, credit notes issued in 2017-18 towards
 - a. B to B supplies
 - b. Export with payment of tax
 - c. SEZ supplies with payment of tax
 - d. Deemed exports.

Table 9B of Form GSTR 1 is used for reporting in this table.

Table 4J Debit Notes issued in respect of transactions specified in (B) to (E) above (+)

1. This is an additional supply and liability apart from whatever is reported above.
2. Similar to Table 4I above, this table will also not include any Debit Notes raised for B2CS and B2CL
3. Information to be reported in this table is, debit notes issued in 2017-18 towards
 - a. B to B supplies
 - b. Export with payment of tax
 - c. SEZ supplies with payment of tax
 - d. Deemed exports.

These details also can be extracted from Table 9B of GSTR-1

Table 4K Supplies / tax declared through Amendments (+)

1. This is increase in the value of supply because of amendments.
2. This is applicable for all the above tables including B2C
3. If a Value of supply changed from Rs. 90 to Rs. 100, then Rs. 90 would reported in earlier tables and Rs.10 would be reported in this table.
4. This may also include amendments owing to cross Turnover reporting also i.e. IGST instead of CGST + SGST or vice versa.
5. The amendments made in 2017-18 would only be included here.

Table 4L Supplies / tax declared through Amendments (-)

1. This is decrease in the value of supply because of amendments.

2. Like the above table this is applicable for all the above tables including B2C
3. If a Value of supply changed from Rs. 100 to Rs. 90, then Rs. 100 would reported in earlier tables and Rs.10 would be reported in this table.
4. This may also include amendments owing to cross Turnover reporting also i.e. IGST instead of CGST + SGST or vice versa.
5. The amendments made in 2017-18 would only be included here.

Table 5: Details of Outward Supplies on which tax is not payable as declared in the returns during the financial year.

Let us understand interlinking of Table 5 with other returns earlier filed.

Table No.	Description	Table Ref of GSTR 1	Table Ref of GSTR 3B
5A	Zero rated supply (Export) without payment of tax	6A	3.1 B
5B	Supply to SEZs without payment of tax	6B	3.1 B
5C	Supplies on which tax is to be paid by the recipient on reverse charge basis	4B	3.1 D
5D	Exempted	8	3.1 C
5E	Nil Rated	8	3.1 C
5F	Non-GST supply	8	3.1 E
5G	Sub-total (A to F above)		
5H	Credit Notes issued in respect of transactions specified in A to F above (-)	9B	3B Net off (-)
5I	Debit Notes issued in respect of transactions specified in A to F above (+)	9B	3B Net off (+)
5J	Supplies declared through Amendments (+)	9A (A to F)	3B Net off (+)
5K	Supplies reduced through Amendments (-)	9A (A to F)	3B Net off (-)
5L	Sub-Total (H to K above)		
5M	Turnover on which tax is not to be paid (G + L above)	8A, B, C & D (6A, B Without payment)	3.1 (B, C & E)
5N	Total Turnover (including advances) (4N + 5M - 4G above)	4,5,6 ,8 & 11A	3.1 A

Table 5A Zero rated supply (Export) without payment of tax

1. Exports made with payment of tax is already reported in Table 4, since there is a GST Obligation to supplier.
2. Here only Exports without payment of tax are to be disclosed.
3. The exports made using LUT or Bond are to be reported.

4. SEZ Supplies not to be included in this table.
5. The Json extract would contain detail under the table 'WOPAY'

This is to be extracted from Table 6A of Form GSTR 1

Table 5B Supply to SEZs without payment of tax

1. Supplies made to SEZ Unit or SEZ Developer with payment of tax is already reported in Table 4, since there is a GST Obligation to supplier.
2. Here only supplies without payment of tax are to be disclosed.
3. Supplies to SEZ developer or unit made using LUT or Bond are to be reported.
4. The Json extract would contain detail under the table 'SEWOP' – SEZ exports without payment

This is to be extracted from Table 6B of Form GSTR 1

Table 5C Supplies on which tax is to be paid by the recipient on reverse charge basis

1. Here the outward supplies where the supplier has no tax obligation, but the recipient has the tax obligation shall be reported.
2. These are the supplies made as per the provisions specified in under Section 9(3) of the CSGT Act, 2017.
 - a. Notification No 04/2017-Central Tax (Rate) dated 28/06/2017 specifies the categories of goods on which tax is to be paid on reverse charge basis and
 - b. Notification No 13/ 2017 Central Tax (Rate) dated 28th June 2017 specifies the categories of services on which tax is to be paid on reverse charge basis.
3. In the Json extract this would be available where the Invoices have the flag YES for 'rchrg' - Reverse Charge

This is to be extracted from Table 4B of Form GSTR 1

Table 5D, Exempted

1. The sum total of exempted supplies made by the registered person is required to be disclosed.
2. Supplies marked for exemption under Sec 11 to be considered for reporting here.

The details would be available in table 8 of GSTR-1

Table 5E Nil rated

1. The sum total of NIL Rated supplies made by the registered person is required to be disclosed.
2. NIL Rated means rate tax is NIL %.

The details would be available in table 8 of GSTR-1

Table 5F Non-GST supply

1. Aggregate value of Non-GST supplies shall be declared here.
2. As per the instruction, the value of "no supply" shall also be declared here.

The details would be available in table 8 of GSTR-1

Table 5H Credit Notes issued in respect of transactions specified in A to F above (-)

1. Value of credit notes issued during the period from 1st July 2017 to 31st March 2018 has to be reported for the following transactions
 - a) Zero rated supply (Export) without payment of tax
 - b) Supply to SEZs without payment of tax
 - c) Supplies on which tax is to be paid by the recipient on reverse charge basis
 - d) Exempted
 - e) Nil Rated
 - f) Non-GST supply
2. This is a negative item since Credit notes reduce the taxable value and tax amount.
3. Values reported in this section will not have any Tax impact on the registered tax payer.

Table 9B FORM GSTR-1 can be used for filling up these details.

Table 5I Debit Notes issued in respect of transactions specified in A to F above (+)

1. Value of Debit notes issued during the period from 1st July 2017 to 31st March 2018 has to be reported for the following transactions
 - a) Zero rated supply (Export) without payment of tax
 - b) Supply to SEZs without payment of tax
 - c) Supplies on which tax is to be paid by the recipient on reverse charge basis
 - d) Exempted
 - e) Nil Rated
 - f) Non-GST supply
2. Debit notes are also another form of supply; hence this value get added to total turnover.
3. Values reported in this section will not have any Tax impact on the registered tax payer.

Table 9B FORM GSTR-1 can be used for filling up these details.

Table 5J Supplies declared through Amendments (+)

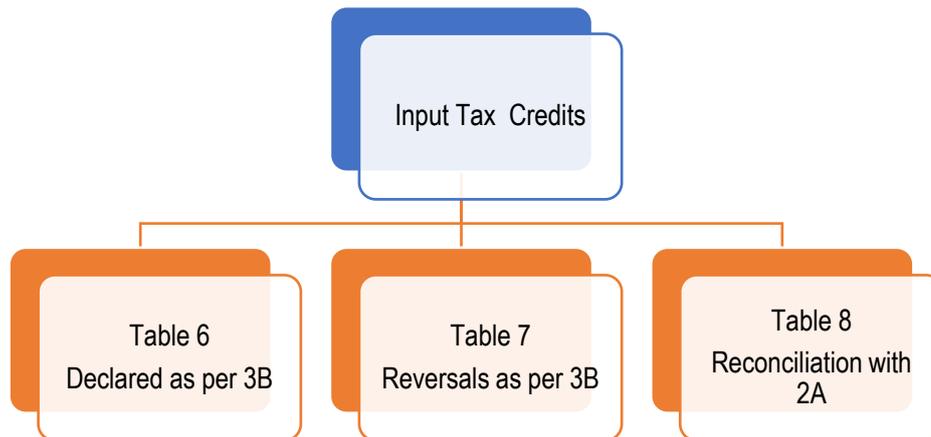
1. This is increase in the value of supply because of amendments.
2. This is applicable for all the above tables in 5, including outward RCM Supplies.
3. If a Value of supply originally reported as Rs. 90 and later changed from Rs. 90 to Rs. 100, then Rs. 90 would reported in earlier tables of 5 and balance Rs.10 would be reported in this table.

Table 5K Supplies reduced through Amendments (-)

1. This is decrease in the value of supply because of amendments.
2. This is applicable for all the above tables in 5, including outward RCM Supplies.

3. If a Value of supply originally reported as Rs. 100 and later changed from Rs. 100 to Rs. 90, then Rs. 100 would reported in earlier tables of 5 and balance Rs.10 would be reported in this table.

Part III: This part deals with the input tax credits availed and reversed by the registered person during the year. In addition, it also includes some other information related to input tax credits. Considering that the registered person must have declared ITC related disclosure in the Form GSTR-3B, let us first understand the relevant tables of GSTR-3B where ITC related disclosures are required to be made.



In GST Returns 3B was reported in Table 4 as presented below:

(A) ITC Available (whether in full or part)

- (1) Import of Goods
- (2) Import of Services
- (3) Inward supplies liable to reverse charge (other than 1 & 2 above)
- (4) Inward supplies from ISD
- (5) All other ITC

(B) ITC Reversed

- (1) As per rules 42 & 43 of CGST Rules
- (2) Others

(C) Net ITC Available (A) – (B)

(D) Ineligible ITC

- (1) As per section 17(5)
- (2) Others

Understanding Table 6

Table	Description	GSTR 3B
6A	Total amount of input tax credit availed through FORM GSTR-3B (sum total of Table 4A of FORM GSTR-3B)	AUTO

6B	Inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs)	4A5
6C	Inward supplies received from unregistered persons liable to reverse charge (other than B above) on which tax is paid & ITC availed	4A3
6D	Inward supplies received from registered persons liable to reverse charge (other than B above) on which tax is paid and ITC availed	4A3 / Table 4 of GSTR2A
6E	Import of goods (including supplies from SEZs)	4A1
6F	Import of services (excluding inward supplies from SEZs)	4A2
6G	Input tax credit from received from ISD	4A4
6H	Amount of ITC reclaimed (other than B above) under the provisions of the Act	
6I	Sub-Total (B to H above)	

The above data would further be bifurcated into

1. Input
2. Capital Goods
3. Input Service

Segregated between

1. CGST
2. SGST
3. IGST
4. Cess

Since details of input tax credits are required to be provided at Table 6, it would be important to note that transactions on which credits have NOT been availed will not form Part of disclosures. In GSTR 3B the credits reported under 4D would not participate in the electronic credit ledgers, similarly only those credited added to electronic credit ledgers would be reported in Table 6.

Table 6A: Total amount of input tax credit availed through FORM GSTR-3B

(sum total of Table 4A of FORM GSTR-3B)

1. Auto Populated from Form GSTR 3B – Table 4(A) which includes Credit availed on import of goods, import of services, Inward Supplies liable to Reverse Charge, Inward Supplies from ISD and Others
2. The credit availed in the GSTR 3B for the period July 2017 to March 2018 will get auto-populated here
3. The credits reversed in Form GSTR 3B – Table 4(B) will not get auto populated nor will such credits be reduced from the credits mentioned at Table 4(A).
4. Credit Reversals form part of SI No 7

Table 6B to 6H : requires data relating to input tax credit availed by the tax payer to be classified and reported in different heads.

We have in the below table, summarised the same for ease for understanding

<u>Classification of Credits</u>	<u>Reporting Table</u>	
	<u>Goods</u>	<u>Services</u>
<u>Input Tax Credit</u>		
Imports	6E*	6F
Inward Supplies from SEZ		
Bill of Entry filed by Recipient	6E*	6B
Bill of Entry filed by SEZ	6B*	NA
Paid under RCM – Registered Supplier	6D*	6D
Paid under RCM – Unregistered Supplier	6C*	6C
Composition Dealer	Not Applicable	Not Applicable
Domestic Inward Supplies	6B*	6B
Input Service Distributor	Not Applicable	6G

* To be bifurcated into Capital Goods and Inputs

Common Notes

1. Bifurcation between Goods and Services could be difficult in the absence of such information being accounted at the time of recording the transaction. The ledger heads where the expenses are booked can be taken as a base to bifurcate the expenses. Eg. Credits related to purchase accounts are most likely to be Goods whereas credits related to Professional Services are most likely to be Services;
2. This issue of bifurcation can be compounded if in the same ledger, there can be both goods and services. For instance, printing and stationery may include both stationery (which are goods) and printing expenses (which are services)
3. Bifurcation of credits between Inputs and Capital Goods will be relatively simpler. Credit related to transactions which are capitalized are to be treated as capital goods. All other goods shown as part of PL account will be classified as inputs
4. Capital Goods does not include services and hence services capitalized will form part service credits only and not capital goods
5. Credits availed under RCM cannot exceed the tax liability discharged under RCM
6. Credits under Imports – goods should be based on the bill of entry filed by the recipient in his name;
7. Credits referred under Table 6B to 6H should be before effecting any reversals. Details of reversals are required to be given at Table 7 to arrive at Net Credit
8. Credits which were reversed for non-payment of consideration to the vendor within 180 days, but which have been re-availed on payment to vendor – These credits are required to be disclosed at Table 6H

Table 6K : Transition Credit through TRAN-I (including revisions if any)

1. Transition Credits claimed under various categories (carry forward, excise on stock etc) are required to be reported here after giving effect to the revisions to such data.
2. Electronic Credit Ledger can be referred to arrive at this value.
3. Credit linked with Trans II though reported in Trans 1 shall not be reported here.

Table 6L : Transition Credit through TRAN-II

1. Transition Credits related to stocks (where excise invoices are not available) are required to be reported here.
2. Electronic Credit Ledger can be referred to arrive at this value

Table 6M : Any other ITC availed but not specified above

1. Any other credits finding no specific classification can be mentioned here.
2. This can include, Credits claimed through
 - a. ITC 01
 - b. ITC 02
 - c. Trans III etc

The sum total of all the credits reflected from 6B to 6M would be considered as credits availed during the period 2017-18.

Table 7 of GSTR 9: Details of reversed and ineligible ITC as declared in returns filed during the financial year

Table 7 at a Glance, part of GSTR 3B – Table 4B

Table	Description	Reference
7A	As per Rule 37	Section 16(2) – payment to supplier not made – 180 days
7B	As per Rule 39	ISD – apportioned is in negative because of CR Note by the ISD
7C	As per Rule 42	Proportionate reversal of credit on common input tax and other than business purpose input tax (D1+D2)
7D	As per Rule 43	Proportionate reversal of credit on common Capital Goods
7E	As per section 17(5)	Blocked Credits
7G	Reversal of TRAN-I credit	Ineligible credits reversed
7H	Reversal of TRAN-II credit	Ineligible credits reversed

Table 7 A: As per Rule 37

1. Apart from fulfilling other conditions as prescribed under Section 16(2) for eligibility of ITC, a registered person must ensure that the value of supply along with the tax charged by the supplier is paid to him within 180 days from the date of the invoice. In case either full or part of the consideration along with tax is not paid within such time, the registered person is required to reverse ITC fully or proportionate to the value not paid within 180 days.

2. Subsequently whenever the same is paid to the supplier, the ITC can be reclaimed by the registered person, such reversal of ITC for non-payment of value to the supplier is required to be disclosed under this para.
3. Following are the exceptions not requiring reversal of ITC:
 - a. Supplies which are listed in Schedule I of CGST Act, 2017 which were made taxable in the hands of the supplier even though the same were without consideration. (related party/distinct person transactions, principal-agent transactions etc.,)
 - b. Amount incurred by the recipient which was the liability of the supplier which is added to the value of supply for taxability purpose under Section 15(2)(b).
4. The above amounts are required to be reported from GSTR 3B filed for the year 2017-18.

Table 7 B: As per Rule 39

1. In this Table, the ITC reversed on account of distribution of credit note by the input service distributor is required to be disclosed.
2. It could be on account of Credit notes issued by ISD. Credits notes could also arise on account of wrong adjustment of Turnover apportioned or with regard to supplier side credit notes etc.
3. This detail would be available from GSTR-3B Table 4(B)(2) along with Workings made thereunder.

Table 7C as per Rule 42

1. A widely spoken rule in ITC Reversal, where in a registered person has both taxable as well as exempt supply during any month/year as the case may be then he is required to identify common Input & Input services credits and reverse the same as reversal under Rule 42:
2. This could be summation of monthly reversals extracted from GSTR 3B Workings.
3. Though, the reversal under Rule 42 is required to be computed and reversed on a month to month basis based on the proportionate formula prescribed in Rule 42., a final computation for every financial year is also required to be calculated. Any excess or short reversal has to be claimed back or reversed respectively before filing the return for September of next year.
4. Reclaimed of excess reversal would be reported in Table 6M
5. Please note, Interest liability arises in case of short reversal from April 1 of next financial year to the date of such reversal.
6. This detail would be available from GSTR-3B Table 4(B)(2) along with Workings made there under.

Table 7D as per Rule 43

1. The above discussion of reversal of ITC under Rule 42 equally applies except for the below:
2. Rule 43 is applicable only in case of capital goods
3. Reversal is every month. A final computation for the financial year is not required to be done
4. Interest has to be computed if there is short reversal for the respective month

5. This test has to be done every month for every capital goods considering the useful life to be 60 months.
6. For the purpose of Rule 42 and 43 interest income is not considered as exempt supply.
7. This detail would be available from GSTR-3B Table 4(B)(2) along with Workings made there under.

Table 7E As per Section 17(5)

1. Items are required to be reported here only if the same are not reduced in table 4A of GSTR 3B for respective month and the ITC amounts are shown at gross level before reduction of ineligible credits under Section 17(5).
2. If the ITC amount disclosed in table 4A of GSTR 3B is after reducing ineligible ITC under Section 17(5), then the same should not be reported here again as it results in reduction twice.
3. Every ineligible item which are not eligible to be claimed as ITC in the hands of the registered person on the goods and services listed under Section 17(5) should be reported here.
4. Every ineligible item reported here does not get tested for reversal under Rule 42/43 as discussed earlier.

Table 7F Reversal of TRAN-I credit

1. In case of wrong avilment of transitional ITC in TRAN-1, the same reversed needs to be reported under this table
2. Reasons for reversal could be many, some of it could be:
 - a. Claiming ITC on inputs or input services which are ineligible under GST
 - b. Claiming full ITC without having duty/tax paid invoice
 - c. Cenvat/ITC as per last return filed not matching to TRAN-1 credits filed etc.,
3. This detail would be available from GSTR-3B Table 4(B)(2) along with Workings made there under.

Table 7G Reversal of TRAN-II credit

1. One of the conditions for claiming TRAN-II credits is that the benefit of ITC is passed on to the customer in the same supply made under GST. If the benefit is not passed on, the registered person is ineligible to claim ITC. This could be the reason for reversal of TRAN-II credits wrongly claimed
2. Another reason could also be that TRAN-II credits are claimed without supplying such stocks within 6 months from July 1, 2018
3. This detail would be available from GSTR-3B Table 4(B)(2) along with Workings made there under.

Table 7H Other reversals (pl. specify)

1. Any other type of reversals apart from those that are discussed above should be reported here

2. Rule 38 : 50% Claim of credit by a banking company or a financial institution
3. Rule 44 : 18(4) Reversal, ITC availed on Taxable Goods becoming exempted or ITC reversal on a dealer opting out of Composition Scheme
4. Reversal made by the transferor registered person in case of change in constitution on account of sale/demerger etc.
5. This detail would be available from GSTR-3B Table 4(B)(2) along with Workings made there under.

Table 8 of GSTR 9: Other ITC Related Information

1. This table will assist the registered person and the department authority to understand the amount of input tax credit availed and lapsed.
2. The amount of input tax credit availed is directly linked with the supplier's compliance under the GST law.
3. In case the supplier has uploaded the details of Invoices on which the recipient has availed the credit then such recipient is given the privilege of enjoying the input tax credit
4. The Government has delegated the responsibility on the recipient to follow up with the supplier for availing of the input tax credit.
5. This table has segregated the input tax credit pertaining to Inward supplies and Imports of goods separately.
6. In the Normal Course Inputs availed would be matching with outputs declared by the supplier

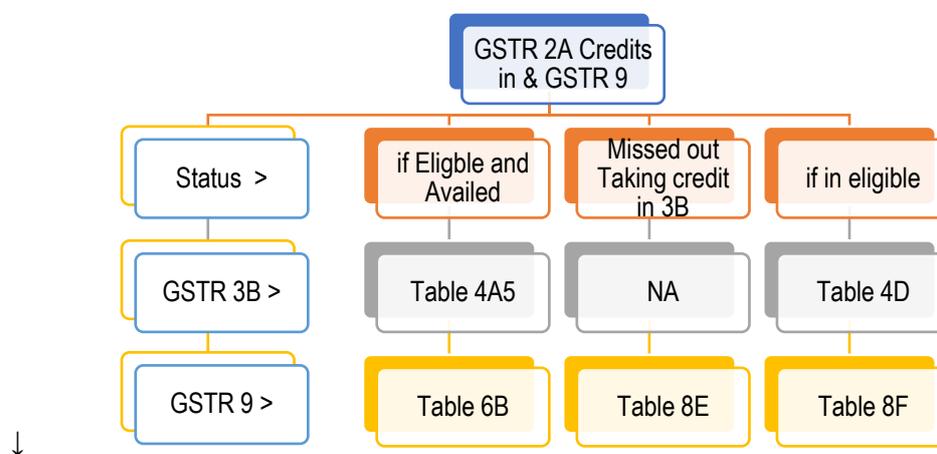


Table 8A : (ITC as per GSTR-2A (Table 3 and Table 5 thereof)):

1. This is an auto populated information of GSTR 2A from Table 3 and Table 5
 - a. Table 3 of GSTR 2A pertains to inward supplies received from a registered person other than supplies attracting reverse charge.
 - b. Table 5 of GSTR 2A pertains to Debit/Credit Notes received during the current period.
2. This would be the aggregate of all the input tax credit that has been declared by the corresponding suppliers in their Form GSTR-1 filed for Financial year 2017-18

Table 8B (Input Tax credit as per sum total of 6(B) and 6(H) of Form 9)

1. This is auto populated from the Annual Return for comparison.
2. This is equivalent to Table 4(a)(5) of GSTR 3B
3. The data auto populated is pertaining to the input tax credit availed on inward supplies including services received from SEZ but excluding Imports and inward supplies liable for reverse charge.
4. This would not have Input tax credits of earlier years reclaimed, since the same would not be available in current year GSTR 2A.

Table 8C (ITC on inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZ) received during 2017-2018 but availed during April to September 2018).

1. This portion is a very crucial information for GSTR 9, to compute any missing credits which would be lapsed.
2. Input tax credit though pertaining to 2017-18 can be availed in 2018-19 till the due date of filing of the GSTR-3B for the month of September 2018.
3. GSTR 2A depicts all such supplies in the year 2017-18.
4. To arrive at credits lapsed, it is critical to consider how much amount of credit pertaining to 2017-18 has been availed in the financial year 2018-19.
5. Table 4(A)(5) of Form GSTR -3B of April 2018 to September 2018 may be used for filing up Table 8C of Form GSTR 9.
6. This data has to be extracted from the Form GSTR 3B of April 2018 – September 2018 which consist of the consolidated details of the respective tax period including the input tax credit pertaining to financial year 2017-2018.
7. Therefore, this will be self-assessed by the registered person to analyze the input tax credit pertaining to previous year with the supporting data and working papers as maintained by the registered person.

Table 8D (Difference (8A-(8B+8C))

Ideally the value in section should be positive, however this may be positive or negative. There can be different scenarios in this table.

1. In case all the transactions are reported in GSTR 2A within the specified time and input tax credit is availed within the specified time then the difference will be positive figure and that amount will pertain to ineligible input tax credit and accordingly it will be lapsed.
2. In case all the transactions are not reported in GSTR 2A within the specified time and the recipient has availed the input tax credit then in such instance it will be negative figure and this amount will be only disclosure in the Annual Return.
3. The sum total of 8E and 8F should be equal to 8D.

Table 8E of Form GSTR 9 (ITC available but not availed):

1. In case the registered person has not availed the credit within the specified time as per GST law then the input tax credit will be lapsed.

2. In other words, in case the input tax credit availed is less than the amount as auto populated in GSTR 2A then the balance input tax credit will be lapsed as input tax credit unavailed.

Table 8F of Form GSTR 9 (ITC available but ineligible):

1. There should be bifurcation of eligible and ineligible input tax credit and accordingly the ineligible credit should be disclosed separately in this table which is reflected in GSTR 2A.
2. These credits were forming part of GSTR 3B Table 4D, which was not part of electronic credit ledger.
3. In an ideal situation values reported in Table 4D would be derived for lapsing the ineligible credits.

Table 8G: IGST paid on Import of goods (including supplies from SEZ):

1. The IGST paid on import of goods including inward supplies from SEZ during the financial year should be declared here. The import of goods is liable for custom duty and IGST.
2. This section will not include any IGST paid on import of services.
3. Even the inward supplies of goods from SEZ liable to IGST. The IGST paid on both inputs and capital goods will be disclosed here.
4. The input tax credit should be reconciled with the information in ICEGATE. This information will be total input tax credit. This amount of credit will be for the period July 2017 to March 2018

Table 8H: IGST credit availed on Import of goods (as per (6E of Annual Return))

1. The aggregate of IGST paid on inputs and capital goods will be aggregated from 6E of Annual Return and will be auto populated in this column.
2. It purely covers import of goods and not import of services.

Table 8I: Difference (G-H)

1. This shows the difference between IGST paid on import of goods and IGST claimed in return. This data is restricted to financial year (July 2017 to March 2018).
2. The difference can be positive or negative. In case the difference is positive then it will be lapsed and will be disclosed in table 8J of Annual Return.

Table 8J: ITC available but not availed on Import of goods (Equal to I)

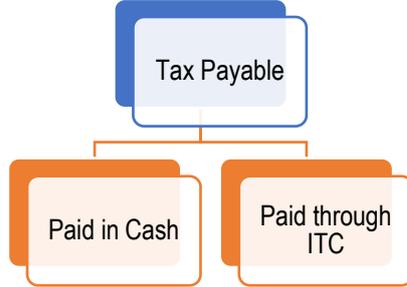
1. This column will be positive figure of 8I of Form GSTR 9.
2. This amount of input tax credit will be equal to **ineligible or unavailed** input tax credit on import or goods. The Input tax credit as disclosed in this table will be lapsed.
3. This value would be equal to 8I.

Table 8K: Total ITC to be lapsed in current Financial Year (E+F+J)

1. This table is auto populated by aggregating of 8E, 8F and 8J of Annual return.
2. This is reporting mechanism for the Registered Person to disclose the total input tax credit lapsed.

PART IV: DETAILS OF TAX PAID

This table captures the Total Taxes payable and paid as per GSTR 3B of 2017-18



This would be auto populated from offset Table 6.1 of Form GSTR-3B filed

PART V: Particulars of the transactions for the previous FY declared in returns of April to September of current FY or up to date of filing of annual return of previous FY whichever is earlier:

Any errors or omissions made in the return for any financial year can be corrected in the subsequent month's returns. However, this is allowed only upto April to September of current FY of date of filing of the annual return for the previous FY whichever is earlier. The mechanism of such corrections have been described in detail in Circular no. 26/26/2017 dated 29th December 2017.

Table 10: Supplies / tax declared through Amendments (+) (net of debit notes)

1. In this table, both additions and amendment reported in 2018-19 for the supplies which happened in 2017-18 are to be considered.
2. This table creates additional liability over and above reported in Table 9
 - a. Eg: Invoice raised during February 2018, however the same is considered and reported in GSTR 1 for June 2018,
 - b. This additional value is to be considered in this column.
3. This would also capture Amendments made in the value of supplies / tax paid against invoices reported in previous financial year which has upward value correction.
4. Amendments made in table 9A, 9B and 9C of Form GSTR 1 are to be considered for reporting in Table 10.

Table 11: Supplies / tax declared through Amendments (-) (net of credit notes)

1. In this table, both reduction and amendment reported in 2018-19 for the supplies happened in 2017-18 are to be considered.
2. This table reduces the Tax liability from the value reported in Table 9
 - a. Eg: Invoice raised during February 2018 which was erroneously considered at a higher value in Form GSTR 1
 - b. The same can be corrected in and reduced in GSTR 1 for June 2018,
 - c. This reduction in value to be considered in this Table.
3. This would also capture other Amendments made in the value of supplies / tax paid against invoices reported in previous financial year which has downward value corrections.

4. Amendments made in table 9A, 9B and 9C of Form GSTR 1 are to be considered for reporting in Table 11.

Table 12: Reversal of ITC availed during previous financial year

1. This table attempts to capture
 - a. Aggregate value of reversal of ITC which was availed in the previous financial year
 - b. but reversed in returns filed for the months of April to September of the current financial year or
 - c. date of filing of Annual Return for previous financial Year, whichever is earlier
2. Data reported in this table is only for information and not used in any part of calculation or reversal of ITC elsewhere.
3. Eg: Credit was availed in January 2018 which was later found to be ineligible. This credit is thereby reversed in Sept 2018. This Value of reversal is to be reported under this table..
4. This can be extracted from the workings made for the reversal in Table 4B of GSTR 3B of 2018-19 which pertain to the year 2017-18
5. In simple words this is the credit reversal pertaining to Table 7, but it has been reversed in 2018-19 and not in 2017-18.

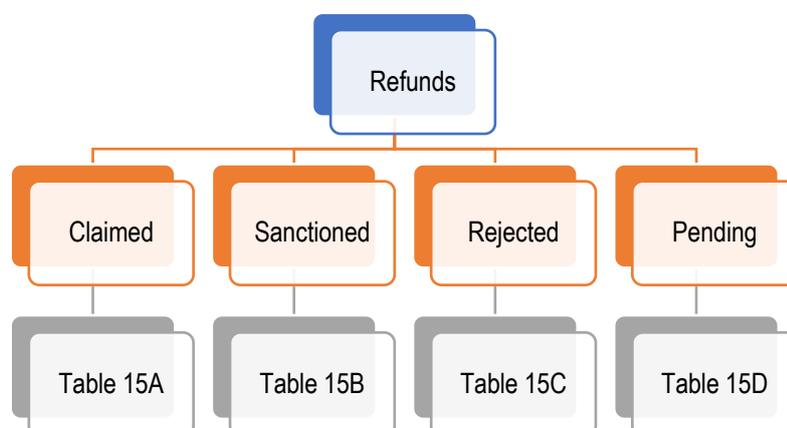
Table 13: ITC availed for the previous financial year

1. This table attempts to capture
 - a. Aggregate value of ITC pertaining to the previous financial year
 - b. but availed in returns filed for the months of April to September of the current financial year or
 - c. date of filing of Annual Return for previous financial Year, whichever is earlier
2. This can be extracted from the workings made for the reversal in Table 4A of GSTR 3B of 2018-19 which pertain to the year 2017-18

Table 14: Differential tax paid on account of declaration in 10 & 11 above

1. This table captures the details of Taxes paid on account of Table 10 and 11 above
2. In case if there is a downward revision, this information is not captured as negative.
3. This is only Net of Table 10 and Table 11, the tax payable and taxes paid there on is reported here.
4. Bifurcation of this payment by cash and credit are not to be mentioned separately.

PART VI: Other Information

**Table 15A: Total Refund claimed**

1. The aggregate value of refund of taxes claimed (CGST, SGST/UTGST, IGST and Cess to be disclosed separately) under the GST Law during July 2017 to March 2018 have to be reported here.
2. Refund could be of -
 - a. taxes paid in excess and balance in the cash ledger after payment of taxes
 - b. in case of zero-rated supplies of goods/ services
 - i. unutilised input tax credit when supply made without payment of taxes
 - ii. taxes paid when supply made with payment of taxes
 - c. taxes paid on account of deemed exports (where refund is claimed as supplier)
 - d. taxes paid on account of deemed exports (where refund is claimed as recipient)
 - e. unutilised input tax credit on account of inverted duty structure.
 - f. pre-deposits made
 - g. taxes paid where the transactions considered as intra-state supplies, but which is subsequently held as inter-state supplies.
3. Note: Non-GST refund claims (i.e. refund claimed under erstwhile law) should not be reported here.

Table 15B: Total Refund sanctioned

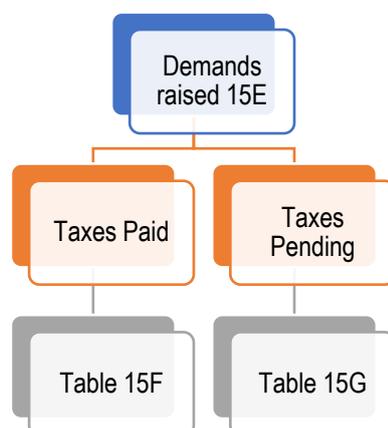
1. The aggregate value of refund of taxes (CGST, SGST/UTGST, IGST and Cess) **sanctioned till the filing of annual return**, out of the total refund applied in financial year shall be considered here.
2. Receipt of refund is not a criteria, issue of Refund order is a sufficient base for reporting the value under this head.

Table 15C: Total Refund Rejected

1. The aggregate value of refund of taxes (CGST, SGST/UTGST, IGST and Cess) **rejected** out of the total refund applied in financial year.
2. If a Deficiency memo is issued or an SCN raised shall not be considered as rejected.

Table 15D: Total Refund Pending

1. The aggregate value of refund of taxes (CGST, SGST/UTGST, IGST and Cess) **pending** out of the total refund applied in financial year.
2. Value of pending refunds only to be reported.
3. Pre-GST refunds are not to be reported in this Table.

**Table 15E: Total Demand of Taxes**

1. The aggregate value of demands of taxes (CGST, SGST/UTGST, IGST and Cess) along with interest, penalty and late fee for which an order confirming the demand has been issued by the adjudicating authority has to be reported under this head.
2. Demand raised through show cause notices are not to be reported under this table as it is not confirmed demand.

Table 15F: Total Taxes paid in respect of 15E

1. The aggregate value of Taxes paid against the demands raised shall be reported here.
2. In the scenario where the order has been passed in GST RFD-07 by way of adjustment of the amount of refund against the outstanding demand under the GST, then, the amount of such refund adjusted will form part of reporting under this head

Table 15G: Total demands pending out of the aforesaid demand of taxes

1. The aggregate value of Taxes NOT paid against the demands raised shall be reported here.
2. Even in the cases where appeal is made, the values are to be reported in this section.

Table 16 provides for Information on supplies received from composition taxpayers, deemed supply under section 143 and goods sent on approval basis

Table 16A: Supplies received from Composition taxpayers

1. Inward supplies received from composition taxpayers need to be disclosed.
2. This detail would be available in Form GSTR-3B Table 5
3. Bill of Supply is a document issued by composition supplier, however the same document is issued for exempted supplies, hence due care to be taken in Non-reporting of NIL-rated, exempted, non-GST etc.

Table 16B: Deemed supply under section 143

1. Section 143 (3) and (4) of the CGST Act deals with payment of tax on deemed supply when inputs or capital goods are not returned by the recipient (job-worker) within one year or three years respectively from the date of being sent out.
2. Details of goods sent / returned, shall be filed in ITC -04, which could be the source of compilation.
3. First year of Annual returns this value would NIL since 1-year time not lapsed from 1st July 2017.

Table 16C: Goods sent on approval basis but not returned

1. Sec 31(7) of the Act allows for sending goods on sale or approval basis but to return within 6 months (180 days). When such goods not returned it would be a deemed supply, the value of the same shall be reported here in under this table.
2. **Sec 142(12) Goods sent on approval prior to GST regime:** Where goods are not returned by the recipient within 6 months from July 01, 2017 in respect of goods sent on approval basis prior to GST regime (sent on approval basis between Jan 1, 2017 to Jun 30, 2017), such details need to be reported in this filed which may be missed out.

Table 17: HSN Wise Summary of outward supplies.

Summary of supplies effected against a particular HSN code are to be reported in table 17.

HSN	Annual Turnover during the preceding year
Optional	upto ₹ 1.50 Cr
Two digits	above ₹ 1.50 Cr but upto ₹ 5.00 Cr
Four digits	above ₹ 5.00 Cr

1. UQC details to be furnished only for supply of goods.
2. If cess is applicable for any HSN, then same to be reported.
3. Quantity and taxable supplies to be reported net of returns.
4. Table 12 of FORM GSTR-1 may be used for filling up details in Table 17.
5. Taxable supplies should be net of credit note & debit note.
6. Advance received and adjusted should not be considered.

Table 18: HSN Wise Summary of Inward supplies.

Summary of supplies effected against a particular HSN code are to be reported in table 18 as follows:

HSN	Annual Turnover during the preceding year
Optional	upto ₹ 1.50 Cr
Two digits	above ₹ 1.50 Cr but upto ₹ 5.00 Cr
Four digits	above ₹ 5.00 Cr

1. UQC details are to be furnished only for supply of goods.
2. Quantity and taxable supplies to be reported net of returns.
3. Taxable supplies should be net of credit note & debit note.
4. Advance received and adjusted should not be considered.
5. This includes
 - a. Inward supplies from registered suppliers.
 - b. Inward supplies from unregistered suppliers.
 - c. Inward supplies from composition suppliers.

Table 18: Late Fee Payable

1. This is an Auto calculated table
2. Tax payments to be made for late fees in GSTR 9 itself. Only after making such payments, Annual return can be filed.
3. Late fees:
 - a. Minimum: Rs. 100/- per day per Act (CGST +SGST)
 - b. Maximum: (0.25%CGST + 0.25% SGST) of the turnover in the State or Union Territory.

Verification part

The verification part of the Annual Return is very crucial which requires ensuring the following by the registered person filing the Annual Return:

- a. Information given in the Annual Return is 'true' and 'correct'. It is important to note that word used is 'correct' which indicates absolute assurance as to the correctness of details furnished.
- b. The disclosure made as above should be to the 'best of knowledge and belief' of the registered person. This clause is safeguards for the bonafide registered persons.
- c. Nothing has been concealed from disclosure by the registered person. This indicates that the registered person has onus to disclose every thing which is required to be disclosed. If any thing is concealed, this could lead to serious consequences in future.
- d. In case of reduction in output tax liability, the benefit thereof has been or will be passed on the recipient of the supply. This part is intended to ensure compliance with the anti profiteering provision. Here, it would be relevant to note that the anti profiteering is triggered in case of (i) decrease in rate of tax (ii) increase in credit. However, the verification in the annual return is only for the decrease in the tax rate,

Conclusion: Annual Return is very comprehensive disclosure requirement which cast responsibility on the registered person to disclose all such things which are required to be disclosed therein by understanding each of the columns mentioned above. The readers could use the above discussion for filing their GSTR-9.

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- Indirect Taxes Committee