

Newsflash: Action points before filing the GST returns for the month of September 2021





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1.0 Overview:

Under Goods and Services Tax (GST) law, filing of return for the month of September is considered crucial for reconciliations and input tax credit perspective. This return is considered as the last opportunity for reporting any outward supply or making any correction in outward supply already reported or to make a claim of an input tax credit of inward supply pertaining to the preceding year. In light of this, we have enumerated few action points which taxpayers may consider before finalising and filing of GST return for the month of September 2021.

2.0 Issuance of credit notes and their adjustment pertaining to FY 2020-21

A credit note issued shall be declared in the returns filed for the month during which such credit note is issued but not later than the month of September of the following year in which the corresponding supply was made. The tax liability against such credit notes issued pertaining to the preceding year shall also be adjusted before the said time period. [Section 34 of Central GST Act, 2017]

Therefore, it is advisable that necessary steps may be taken to identify and account for the credit notes which are pertaining to FY 2020-21 and the same may be reported latest in the GSTR-1 for the month of September 2021.

3.0 Reporting of fresh outward supply or correction therein pertaining to FY 2020-21

Any tax invoice which is missed to report in GSTR-1 or reported but with incorrect particulars in GSTR-1 can be reported or corrected not later than the month of September of the following year to which such tax invoice pertains. [Section 37 of Central GST Act, 2017]

Therefore, it is advisable that necessary steps may be taken to reconcile the reporting made in GSTR-1 for FY 2020-21 with books of account and identify the discrepancies, if any and same may be reported or corrected latest in the GSTR-1 for the month of September 2021.

4.0 Claim of input tax credit pertaining to FY 2020-21

Input tax credit with respect to any tax invoice or debit notes can be claimed in the month of receipt of supply and date of invoice or debit note, subject to fulfilment of other conditions. However, no input tax credit can be claimed after the due date of furnishing GSTR-3B for the month of September of the following year to which such tax invoice or debit notes pertains. **[Section 16 of Central GST Act, 2017]**

Therefore, it is advisable that necessary steps may be taken to reconcile the input tax credits claimed in GSTR-3B for FY 2020-21 with books of account and identify the unclaimed input tax credit, if any and the same may be claimed latest in the GSTR-3B for the month of September 2021.



5.0 Correction of input tax credit for FY 2020-21 not appearing in GSTR-2A

An input tax credit can be availed in respect to invoices or debit notes which are appearing in GSTR-2A. However, at times due to any reason, some invoices or debit notes may not be appearing or appearing but with incorrect particulars and in such cases input tax credit must have remained unclaimed. As stated in the earlier paragraph, no input tax credit can be claimed after the due date of furnishing GSTR-3B for the month of September of the following year. [Section 16 of Central GST Act, 2017 read with Rule 36 of Central GST Rules, 2017]

Therefore, it is advisable that necessary steps may be taken to reconcile the input tax credit of books with GSTR-2A to identify unclaimed input tax credit or discrepancies, if any and accordingly, suitable communication may be made with the respective supplier (vendor) informing such discrepancies with a request to correct the same on or before filing the GSTR-1 for the month of September 2021 and thereafter such input tax credits may be claimed latest in GSTR-3B for the month of September 2021.

This may be considered as a last opportunity to report or rectify the reporting for claiming the input tax credit pertaining to FY 2020-21.

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This newsflash summarizes the action points which taxpayers need to consider below finalising and filing of GST return for the month of September 2021. It may be noted that nothing contained in this newsflash should be regarded as our opinion and facts of each case will need to be analyzed to ascertain applicability or otherwise of the said judgement and appropriate professional advice should be sought for applicability of legal provisions based on specific facts. We are not responsible for any liability arising from any statements or errors contained in this newsflash.

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