

# GSTR 9 & 9C

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Venue: ACAE

Date: 21/01/2020

# Importance of Annual Return

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- Data scattered over multiple periods
- Final picture of 2017–18
- Voluntary corrections
  - Liability corrections
  - ITC corrections – no ITC can be availed, ITC cannot be reversed

# Reconciliation

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- Liability reconciliation
  - GSTR3B vs GSTR1 vs Books
- RCM reconciliation
- ITC reconciliation
  - GSTR3B vs GSTR2A vs. Books

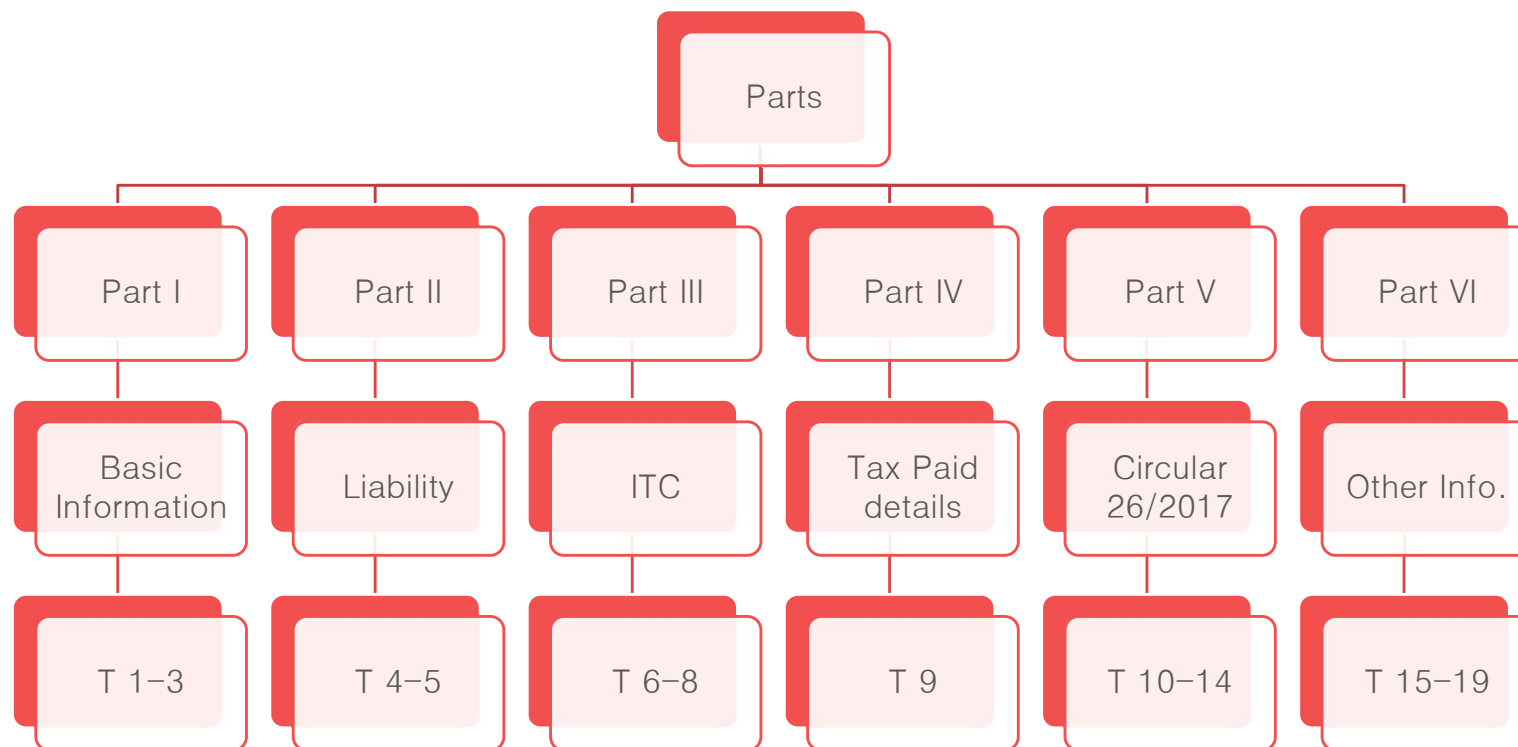
# Few Pointers for GSTR9

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- GSTR9 to be filed GSTIN wise
- Nil return to be filed if all criteria for a nil return is met
- If the status of person in last date of FY is not registered, even then return to be filed
- All GSTR 1 and GSTR 3B to be filed before GSTR 9
- Due date for FY 18–19 is 31/03/2020
- Per Section 47(2) of CGST Act, a person will be fined a penalty of INR 100 per day (CGST) + INR 100 per day (SGST), amounting to a total of INR 200 per day if he/she fails to file GSTR–9 before the due date

# GSTR 9: 6 Parts, 19 Tables

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# Tables at a glance

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- Turnover:  $4 + 5 + 10 - 11$
- Tax paid as per books: 9 & 14
- ITC as per books:  $6 - 7 - 12 + 13$
- Refund: 15
- Informative tables: 1, 2, 3, 8, 16, 17, 18
- Late Fee: 19

# Practical Issues – Outward Liability

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Liability discharged in 2017–18

- Respective month (perfect scenario)
- Later months

Liability discharged partly in 2017–18 and partly in 2018–19

Part of liability not discharged at all

Paid excess liability

Discharged under wrong heads

# Practical Issues – ITC

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Availed in 2017–18

- Respective months (perfect scenario)
- Later months

Availed and Reversed partly in 2017–18 and partly in 2018–19

Reversed in 2018–19

Missed credits not availed till now

Unreversed credits, i.e. not reversed till now



# Optional Filing of Annual Return

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- N 47/2019-CT dated 09/10/2019
- Aggregate turnover in FY does not exceed Rs. 2 crores
- Circular 124/43/2019-GST dated 18/11/2019
- Should this option be exercised?
- Can DRC03 be filed?

# Simplification of Annual Return / Reconciliation Statement

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- N 56/2019-CT dated 14/11/2019
- Applicable for FY 17-18 & 18-19

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# Simplification/Relaxation in GSTR 9

## Option to fill Table-4B to Table-4E (related to supplies on which tax is payable) net of Credit Notes/ Debit Notes/ Amendments

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- No Separate details of Credit notes/ Debit Notes required in Table-4I & 4J. Details of Credit notes/ Debit Notes can be merged with details given in Table-4B to Table-4E
- No Separate details of Supplies or tax declared/ reduced through amendments required in Table-4K & 4L. These details can be merged with details given in Table-4B to Table-4E
- Details of B2C supplies in Table-4A is already required as net of Credit notes/ Debit Notes

# Table 4 (T4)

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- T 4I to T 4L – now optional
- Debit / credit notes & amendments to be reported in T 4B to T 4E
- If not reported in the respective tables – can be reported in T 4B to T 4E after taking net effect

## Option to fill Table-5A to Table-5F (related to supplies on which tax is not payable) net of Credit Notes/ Debit Notes/ Amendments

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- No Separate details of Credit notes/ Debit Notes required in Table-5H & 5I. Details of Credit notes/ Debit Notes can be merged with details given in Table-5A to Table-5F
- No Separate details of Supplies declared/ reduced through amendments required in Table-5J & 5K. These details can be merged with details given in Table-5A to Table-5F
- Option to report Exempted, Nil rated and Non GST Supplies (Table-5D to 5F) on consolidated basis in the “exempted” row only i.e. in Table-5D

# Table 5 (T5)

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- T 5D, 5E & 5F (Exempt, nil rated, non GST)
- Breakup optional
- Consolidated information may be given in T 5D
- T 5H to 5K now optional
- If not reported in 5H to 5K, it can be reported in T 5A to 5F after taking new effect

## In Table–6B to 6E, Option to report ITC on Inputs, Capital Goods and Input Services on consolidated basis under “Inputs” row only

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- Bifurcation of Normal ITC among Inputs, Capital Goods and Input Services is not required
- Bifurcation of RCM ITC among Inputs, Capital Goods and Input Services is not required
- Bifurcation of Import ITC among Inputs and Capital Goods is not required



## Option to Report RCM ITC on Inward supplies from registered persons (Table-6D) and unregistered person (Table-6C) on consolidated basis in Table-6D

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- Thus there is no need to bifurcate the RCM ITC among supplies received from registered suppliers and unregistered person, as all the supplies can be reported under registered supplier table (Table-6D)
- Thus the entire RCM ITC falling under Input/ Capital Goods and Input Services table of Table-6C & Table-6D may be reported in totality in Input row of Table-6D

# Table 6 (T6)

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- Breakup of ITC now optional
- Entire amount may be reported in Inputs column
- T 6B
- T 6C & 6D (entire amount can be reported in 6D)
- T 6E

## Option to report the entire amount of reversal (From Table-7A to 7E) under Table 7H only

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- An option has been provided to report the consolidated reversal of ITC falling under Table-7A to 7E in Table-7H
- However, reversals on account of TRAN-1 credit (Table 7F) and TRAN-2 (Table 7G) are to be separately reported

# Table 7 (T7)

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- T 7A to 7H
- Entire amount can be reported in 7H along with other reversal
- Reversal of TRAN 1 & TRAN 2 – mandatorily to be reported in T 7F and T 7G respectively

# Others

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- Option to upload the details for the entries in Table 8A to 8D in duly signed PDF format in FORM GSTR-9C (without the CA certification)
- Option to not fill Table-12 (Reversal of ITC availed during preceding year) & Table-13 (ITC Availed for the preceding year) – is it really optional
- Option to not fill Particulars of Demands and Refund (Table- 15A to 15G)
- Option to not provide Information on supplies received from composition taxpayers, deemed supply under section 143 and goods sent on approval basis (Table- 16A to 16C)
- Option to not provide HSN Wise Summary of Outward & Inward supplies (Table-17 & 18)
- Table 9, 10, 11 & 14 no changes

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# Simplification/Relaxation in GSTR 9C

# Table no. 5B to 5N irt Turnover reconciliation

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- Relaxation from providing separate details for adjustment in turnover in Table-5B to 5N, rather the consolidated details may be provided in Table-5O
- After filling T 5A and T 5Q, if difference persists:
- Choice given to either report in various tables
- Or to report in T 5O

# Option to not fill Table-12B & 12C under reconciliation of ITC

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- Details of ITC booked in earlier Financial Years claimed in current Financial Year in Table-12B is not required to be given
- Details of ITC booked in current Financial Year to be claimed in subsequent Financial Years is not required to be given



# Others

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- Reconciliation of ITC declared in Annual Return (GSTR9) with ITC availed on expenses as per audited Annual Financial Statement or books of accounts are not required as filing of Table-14 has been made optional

## Amendment in Part-B OF GSTR-9– Certification (applicable for all financial years)

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- Auditor's comment on Cash Flow Statement is required only when the Cash Flow Statement has been prepared
- Wording of Auditor's opinion has been substituted to "True and Fair" from "True and Correct"

# GSTR 9 to GSTR 9C

Table no. of 9C	Particulars	Table no. of 9
5Q	Turnover as declared in GSTR 9	5N +10 – 11
7F	Taxable turnover as per liability declared in GSTR 9	4N – 4G +10 – 11
9Q	Total amount paid as declared in GSTR 9	9 + 14
12E	ITC claimed in GSTR 9	7J
14S	ITC claimed in GSTR 9	7J

# Some Queries

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- Credit of GST paid under RCM now
- 2A more than 3B, 2A less than 3B, refer section 16
- Should we report as ineligible as available but not availed
- Is 20/10 really a deadline
- How to file DRC 03 – liability payment, ITC reversal (choose voluntary payment)
- Technical issues with DRC

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# THANKYOU!

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