



Imp Points under GST to be done before 30th September

Introduction

- The GST law prescribes due date of September month GST return i.e. 20th October as the last date for making several adjustments pertaining to previous F.Y.
- As per Finance Act 2022, the said due date has been proposed to be revised to 30th November. However, it would be worth noting that this amendment has still not been made effective by the GST council.
- Accordingly, the due date remains to be 20th October for making adjustments of F.Y. 2021-22.
- Failure to do above, may result in loss of GST on account of any adjustments of previous year.
- We have herewith summarized important action points advised to be undertaken by each company.



1. Reconciliation of ITC as per books- GSTR 3B- GSTR 2B/ GSTR 2A

- For the period April to December 2021, ITC was allowed to be claimed to the extent of 95% of ITC appearing in GSTR 2A [in terms of Rule 36(4)].
- For the period January to March 2022, ITC was allowed to be claimed only to the extent of ITC appearing in GSTR 2B.
- On account of the above, ITC for many vendors may not have been claimed in GSTR-3B due to shortfall in GSTR 2A/ GSTR 2B.
- The last date to claim such ITC is 30th September. Accordingly, it is advised to undertake reconciliation of ITC as per books and ITC as per GSTR 3B, follow up with the defaulting vendor and claim ITC on the same by end of September.



2. Reconciliation of RCM Liability

- It is advisable to check if GST under reverse charge is paid on all expenses (such as GTA, Security services, legal charges, sponsorship, etc.)
- If RCM is not discharged on any expense, it would be advisable to pay the same by 30th September and claim ITC of the same.
- If payment is done post 30th September, ITC on such RCM paid may not be available.
- The Supreme Court judgement (dated 19.05.2022) of Mohit Minerals may be kept in mind while undertaking RCM reconciliation.
- The SC has upheld that no GST is payable under reverse charge on import ocean freight for import transactions on a CIF basis.



3. Adjustments on account of credit notes

- Credit note pertaining to invoice of F.Y. 2021-22 can be issued latest by 30th September and the effect of the same has to be provided while filing GSTR-1 and GSTR 3B for September month.
- Therefore, if any goods are returned or price is revised post 30th September pertaining to transaction of F.Y. 2021-22, the GST adjustment will not be done and GST on that amount may be lost.
- Accordingly, we request you to undertake necessary accounts adjustment and issue pending credit notes/debit notes for F.Y. 2021-22 by 30th September.



4. Amendment to GSTR-1

- Based on perusal of GSTR 2A and GSTR 2B, it is possible that there may be some vendors who would not have shown sales in GSTR-1.
- It would be advisable to follow up with the vendors and request them to make amendments to invoices by quoting correct GSTIN in GSTR-1 of September.
- Post filing of September GSTR-1, the GSTN system is likely to lock the amendment portal.



5. Rectification by E-commerce operator

- E-commerce operators are liable to collect TCS on amounts on supplies affected through its portal. The details of such TCS has to be furnished in Form GSTR-8 which is available as credit to the supplier.
- If the E-commerce operator has made any omission or furnished incorrect particulars, the last date to rectify such errors is 30th September.
- Accordingly, it would be advisable for all suppliers who effect sales through E-commerce operators, to reconcile TCS collected by E-commerce operator. In case of any discrepancy, intimation may be made to the E-commerce operator in order to rectify the same

THANK YOU



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