

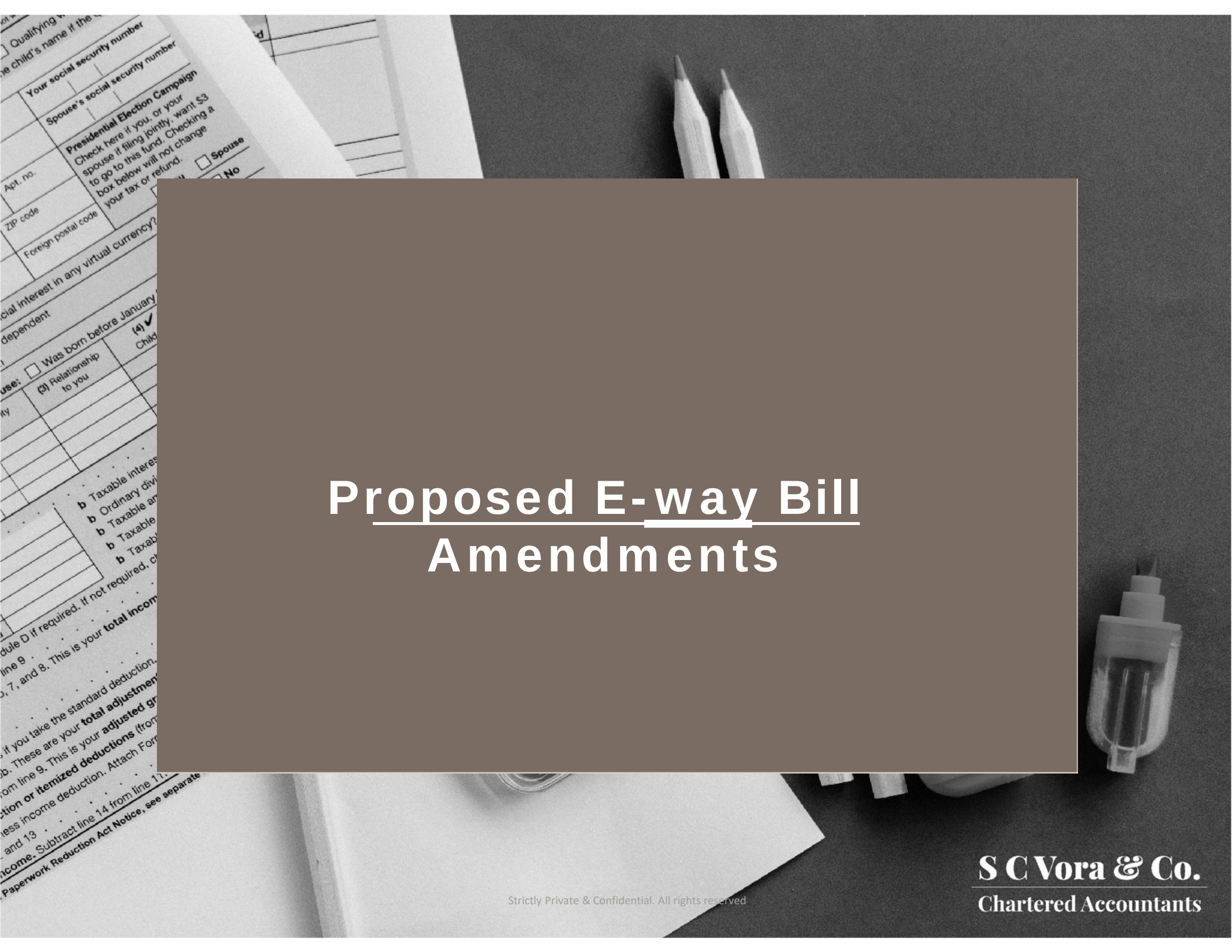


Proposed E-way Bill Amendments kept on hold



GSTN Advisory Update dated 29/07/26

- GSTN has earlier issued advisories dated 09/06/2026 and 17/06/2026 regarding certain proposed changes to the E-way bill system with the scheduled date of implementation as on **01/08/2026**.
- GSTN vide captioned advisory has kept the implementation of such changes on hold until further notice.
- The said proposed changes in the E-way bill were as under:
 - Mandatory quoting of 'GSTIN' in Ship to field
 - Voluntary closure of E-way Bills
- The summary of the same was provided vide our previous update and the same is further reiterated in subsequent slides.



Proposed E-way Bill Amendments

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GSTN Advisory on e-Way Bill dated 20/05/26

1. Mandatory GSTIN of “Ship to” party

- The GSTN has introduced a mandatory update for “Bill-To/Ship-To” transactions. Vide this update, in cases of “Bill to Ship to” transactions, GSTIN of “Ship to” person must now be captured as a mandatory data element
- This is done with the aim of improving the traceability of goods movement.
- In case where the actual recipient (i.e. Ship to person) of the goods is an unregistered person, taxpayers are required to enter “URP” in Ship to GSTIN field.
- Please note that the above change will be effective on GST E-way bill portal wef 15/06/2026



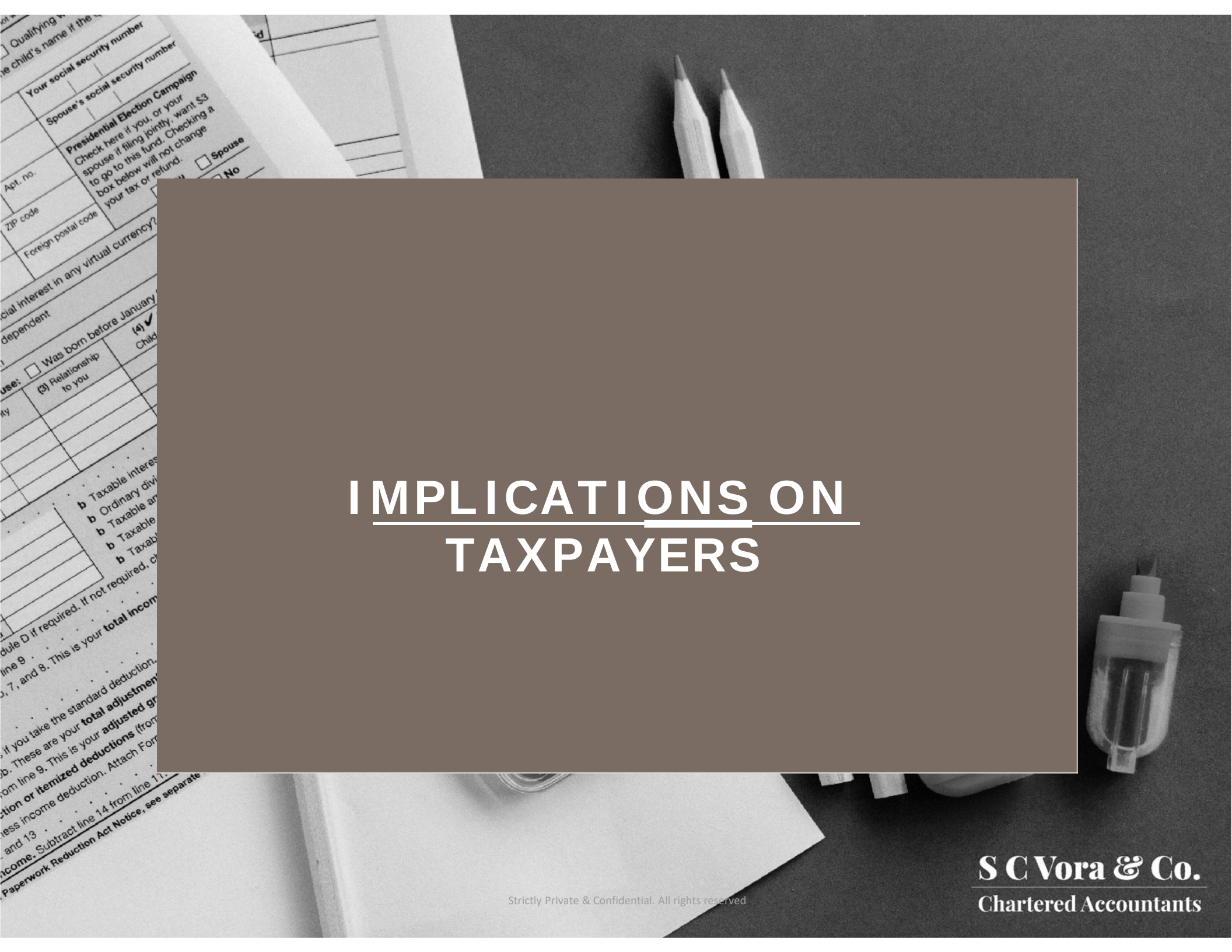
2. Voluntary closure of E-way Bill

- The e-Way Bill system now offers a voluntary closure facility allowing the supplier, recipient, transporter or an authorized person (driver) to mark an EWB as delivered once goods reach their destination.
- Closures can be performed by logged-in users via the e-Way Bill section (either EWB-wise or date-wise), or by a driver using a mobile number + OTP through the “Closing the Ewaybills” page;
- For integrators and system users who prefer automation, an API endpoint has been provided; closure requests must transmit the e-Way Bill number, Closure date and Remarks.
- Please note that the above change will be effective on GST E-way bill portal wef 15/06/2026



Our Comments

- E-way bill closure is a welcome step in order to close the E-way bill and attain finality.
- Introduction of mandatory disclosure of “Ship To” GSTIN may enhance traceability and improve departmental verification of movement of goods.
- However, this may result in disclosure of customer and supply chain information to the original supplier and may potentially impact confidentiality.
- It may also increase the possibility of suppliers directly approaching end customers, thereby affecting intermediary business arrangements.
- The implications are summarized in subsequent slides.

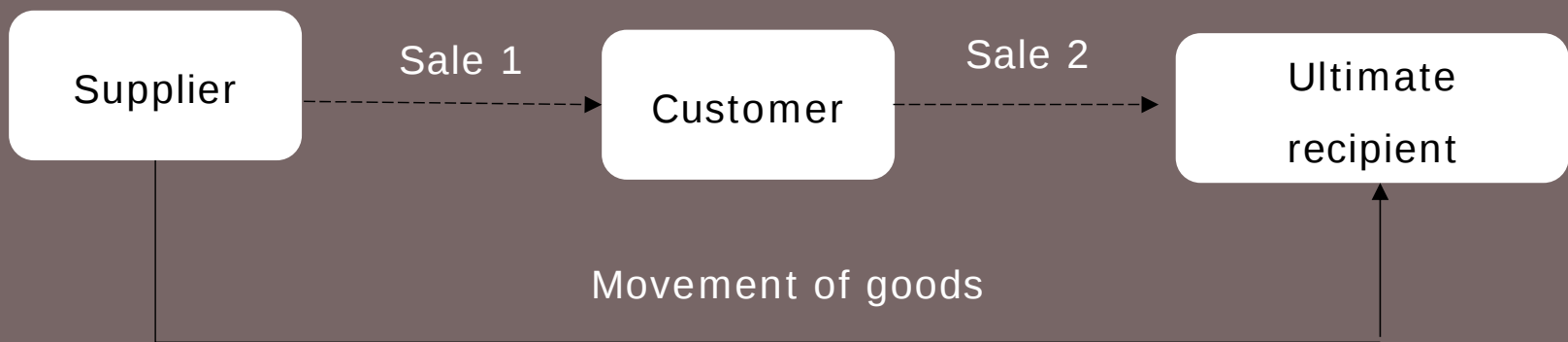


IMPLICATIONS ON TAXPAYERS

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- A Bill-to Ship-to transaction generally involves three parties- Original Supplier | Customer/Intermediary (Bill To Party) |Ultimate Recipient (Ship To Party)
- Under this model, goods are physically delivered by the supplier directly to the ultimate recipient, while the invoice is raised on the intermediary customer.
- This structure is widely used in merchant trading, contract manufacturing, stockless trading models, and supply chain optimization arrangements.



UNDERSTANDING 'BILL TO SHIP TO' MODEL



Position prior to amendment:

- Under the existing E-Way Bill framework, there was no mandatory requirement to mention the GSTIN of the ultimate "Ship To" party in many Bill-to Ship-to scenarios.
- The E-way bill was prepared by any 1 person based on following 4 fields:
 - **Bill from:** GSTIN & Address
 - **Bill to:** GSTIN & Address
 - **Dispatch from:** Address(no GSTIN mandatory)
 - **Ship to: Address** (no GSTIN mandatory)
- As a result of the above, the identity of the ultimate customer remained confidential. However, the tax authorities faced challenges in tracking the exact destination, consumption point and end recipient of goods



Position from 15/06/2026 :

- GSTN has now made it mandatory to capture the **"Ship To GSTIN"** in Bill-to Ship-to transactions during E-Way Bill generation.
- The practical consequences of this amendment may be that the GSTIN of the ultimate recipient will now become visible in the E-Way Bill ecosystem.
- Commercial confidentiality available under the earlier system may significantly reduce.
- Accordingly, businesses operating through multi-layer trading structures may need to re-evaluate their existing supply chain documentation and E-Way Bill processes.



POSSIBLE PRACTICAL SOLUTIONS

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A. Where tax payer is purchasing goods on 'Bill to Ship to' model

- Scenario I: Tax-payer is willing to disclose GSTIN of its customer to the supplier:

Taxpayer may communicate the GSTIN of supplier and supplier may prepare E-way bill accordingly.

- Scenario II: Tax-payer is **not** willing to disclosed GSTIN of its customer to the supplier:

Request the supplier not to generate the EWB and instead taxpayer may generate EWB as under

- **Bill From:** Taxpayer's GSTIN and address
- **Dispatch From:** Supplier's address (GSTIN not mandatory)
- **Bill To:** Customer GSTIN and address
- **Ship To:** Customer GSTIN and address



B. Where tax payer is selling goods on 'Bill to Ship to' model

- Scenario I: Customer is willing to disclose ultimate recipient GSTIN :

Taxpayer may obtain all details of ultimate recipient of goods and prepare EWB as under:

- **Bill From:** Taxpayer's GSTIN and address
- **Dispatch From:** taxpayer's address (GSTIN not mandatory)
- **Bill To:** Customer GSTIN and address
- **Ship To:** Ultimate recipient GSTIN and address

- Scenario II: Customer is **not** willing to disclose ultimate recipient GSTIN :

Practical alternative may be for the customer itself to generate the EWB instead of the taxpayer generating it.



Action Points:

Given the significant commercial implications of mandatory disclosure of Ship To GSTIN, businesses may need to revisit their existing procurement and distribution models and establish appropriate internal controls before the amendment becomes operational.

Suggested action points are as under:

1. Review all existing Bill-to Ship-to arrangements.
2. Evaluate whether customer confidentiality may be impacted.
3. Discuss revised compliance requirements with key suppliers and customers.
4. Update ERP and E-Way Bill generation processes before 15 June 2026.
5. Conduct trial testing wherever E-Way Bills are generated through automated ERP/API integrations.



THANK YOU



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