



Since 1957

KARNATAKA STATE CHARTERED ACCOUNTANTS ASSOCIATION (R.)



CA. RAGHAVENDRA SHETTY
President

CA. JIGAJINNI KUMAR S.
Secretary

To,

Date: 1st December 2018

Shri. Arun Jaitleyji
Hon. Union Minister of Finance and
Corporate Affairs
Government of India
North Block
New Delhi - 110001

Hon'ble Sir,

SUBJECT: REPRESENTATION ON EXTENSION OF DUE DATE FOR FILING OF ANNUAL RETURN IN FORM GSTR-9 AND AUDIT REPORT IN FORM GSTR-9C

The Karnataka State Chartered Accountants Association (R) (in short '**KSCAA**') is an association of Chartered Accountants, registered under the Karnataka Societies Registration Act, in the year 1957. KSCAA is primarily formed for the welfare of Chartered Accountants and represents before various regulatory authorities to resolve the professional problems faced by chartered accountants and business community.

We have written to your good selves many a times populating issues and possible solutions. Herein, we are presenting before your good selves the difficulties and hardship faced by the trade, consultants and companies at large due to delay in enabling GST Annual & Audit related returns, requirement to file state-wise Audit and GST reconciliations for large corporates.

There is sufficient cause and need for the extension of filing of Annual Forms GSTR-9, 9A, 9B and 9C for a reasonable period of time to give justice to the correctness of returns considering the need for reconciliations state-wise. The reasons for the request are as outlined below:

- GST has been a bold and epic reform of the Government, which introduction had taken a decade to reach a logical end. Naturally, this introduction had its fair share of issues on trade and companies due to capacity constraints of GSTN IT infrastructure and various other issues, which required incessant changes of forms, dilution etc. Since, it was unable to introduce in lucid form, it has tumultuous impact on reconciliation of accounts for corporates and other bodies. This has continuously percolated and intruded into time required for GST as well as other compliances and has continued a chain reaction of effects.
- Income Tax returns filing due date for individuals, corporates were regularly extended due to aforesaid and other factors. The frequent changes in e-schema, due date for filing income tax returns and introduction of mandatory late fees along the normal interest not helping the cause either.
- GST Annual Returns and audit are expected to be completed before Dec 31st, 2018 and October 20th being the legitimate date for claiming of lost/ unclaimed Input Tax Credit, and



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inconsistencies along with the follow-ups thereto had been engaging considerable time and effort of the stakeholders.

- To make matters worse, the GSTR Annual forms mentioned above have a considerable delay in being enabled for filing. Further, since the forms are being filed pan India, dealers may have to face considerable difficulties to achieve this herculean task within the next four weeks or so.
- Also, unless proper reconciliation is effected, it could be a matter for extended litigation later-on to the unreconciled returns and/or qualified Audit Reports by auditors if proceeded as it were. The reconciliation element possibly arises partly due to the niggling issues in GST and loose ends therein pursuant to delayed corrections / submissions from suppliers of goods and services for genuine reasons, onslaught of financial difficulties having cumulative bearing on compliances.
- Without proper reconciliation and audit reports, even Revenue would face its fair share of difficulties to rely upon the inputs thrown from audit and it may lead to prolonged litigation, which could be mitigated by an appropriate extension.
- The ground realities mentioned above emerge from the communications received by the professionals from the entities, companies, managements and other stakeholders and the same being sought herein for redressal through your august office.

We hereby appeal your good selves to consider the issues faced by the corporates and consultants and provide a reasonable extension for filing of annual forms GSTR-9 to 9C.

This write-up is on the back of representation received from corporates, trade bodies and practitioners who are in the thick of things and their request for seeking redressal to issues faced.

We would be highly thankful if you could extend the due date well in advance, which would be very useful in planning the filings for the corporates and practitioners meaningfully.

Thanking you,

Yours sincerely,

For **Karnataka State Chartered Accountants Association ®**

CA. Raghavendra Shetty
President

CA. Kumar Jigajinni
Secretary

CA. Vijay Sagar Shenoy
Chairman, Representation
Committee

CC To: O/O the GST Council Secretariat, Connaught Place, New Delhi – 110 001