

**BRIEF ANALYSIS OF NOTIFICATIONS ISSUED ON 3<sup>RD</sup> APRIL 2020**

**INTEREST ON DELAY PAYMENT OF TAX PERIOD FOR FEBRUARY, MARCH, APRIL 2020**

*Notification No- 31/2020 dated 03.04.2020*

TABLE

Sl. No.	Class of registered persons	Rate of interest	Tax period	Condition
(1)	(2)	(3)	(4)	(5)
1.	Taxpayers having an aggregate <b>turnover of more than rupees 5 crores</b> in the preceding financial year	<b>Nil for first 15 days</b> from the due date, and 9 per cent thereafter	February, 2020, March 2020, April, 2020	If return in <b>FORM GSTR-3B</b> is furnished on or before the 24 <sup>th</sup> day of June, 2020
2.	Taxpayers having an aggregate <b>turnover of more than rupees 1.5 crores and up to rupees five crores</b> in the preceding financial year	Nil	February, 2020, March, 2020	If return in <b>FORM GSTR-3B</b> is furnished on or before the 29 <sup>th</sup> day of June, 2020
			April, 2020	If return in <b>FORM GSTR-3B</b> is furnished on or before the 30 <sup>th</sup> day of June, 2020
3.	Taxpayers having an aggregate <b>turnover of up to rupees 1.5 crores</b> in the preceding financial year	Nil	February, 2020	If return in <b>FORM GSTR-3B</b> is furnished on or before the 30 <sup>th</sup> day of June, 2020
			March, 2020	If return in <b>FORM GSTR-3B</b> is furnished on or before the 3 <sup>rd</sup> day of July, 2020
			April, 2020	If return in <b>FORM GSTR-3B</b> is furnished on or before the 6 <sup>th</sup> day of July, 2020."

***Our Comments:***

***Turnover above Rs. 5 Crore***

Month	Time Limit without Interest	Time Limit with Interest @ 9%	Interest Rate @ 18%
February 2020	4 <sup>th</sup> April	24.06.2020	Returns filed after 24.06.2020
March 2020	5 <sup>th</sup> May	24.06.2020	Returns filed after 24.06.2020
April 2020	4 <sup>th</sup> June	24.06.2020	Returns filed after 24.06.2020

### LATE FEES ON FILING OF GSTR 3B

*Notification No- 32/2020 dated 03.04.2020*

No Late Fees shall be charged for February 2020, April 2020 and May 2020 provided the conditions as set forth has been complied

Sl. No.	Class of registered persons	Tax period	Condition
(1)	(2)	(3)	(4)
1.	Taxpayers having an aggregate <b>turnover of more than rupees 5 crores</b> in the preceding financial year	February, 2020, March, 2020 and April, 2020	If return in <b>FORM GSTR-3B</b> is furnished on or before the 24th day of June, 2020
2.	Taxpayers having an aggregate turnover of <b>more than rupees 1.5 crores and up to rupees five crores</b> in the preceding financial year	February, 2020 and March, 2020	If return in <b>FORM GSTR-3B</b> is furnished on or before the 29th day of June, 2020
		April, 2020	If return in <b>FORM GSTR-3B</b> is furnished on or before the 30th day of June, 2020
3.	Taxpayers having an aggregate <b>turnover of up to rupees 1.5 crores</b> in the preceding financial year	February, 2020	If return in <b>FORM GSTR-3B</b> is furnished on or before the 30th day of June, 2020
		March, 2020	If return in <b>FORM GSTR-3B</b> is furnished on or before the 3rd day of July, 2020
		April, 2020	If return in <b>FORM GSTR-3B</b> is furnished on or before the 6th day of July, 2020."

### DUE DATE OF FILING OF GSTR 3B FOR MAY 2020

*Notification No- 36/2020 dated 03.04.2020*

Turnover Limit	States	Due Date
More than Rs. 5 Crore	All States	27.06.2020
Less Than Rs. 5 Crore	Chhattisgarh, Madhya Pradesh, Gujarat, Maharashtra, Karnataka, Goa, Kerala, Tamil Nadu, Telangana, Andhra Pradesh, the Union territories of Daman and Diu and Dadra and Nagar Haveli, Puducherry, Andaman and Nicobar Islands or Lakshadweep	12.07.2020

	Himachal Pradesh, Punjab, Uttarakhand, Haryana, Rajasthan, Uttar Pradesh, Bihar, Sikkim, Arunachal Pradesh, Nagaland, Manipur, Mizoram, Tripura, Meghalaya, Assam, West Bengal, Jharkhand or Odisha, the Union territories of Jammu and Kashmir, Ladakh, Chandigarh or Delhi	14.07.2020
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### **LATE FEES ON FILING OF GSTR 1**

*Notification No- 33/2020 dated 03.04.2020*

No Late Fees on filing of GSTR 1 shall be charged for March 2020, April 2020 and May 2020 and for the quarter ending 31<sup>st</sup> March 2020 provided return in Form GSTR 1 has been furnished on or before 30.06.2020

### **LATE FEES ON FILING OF GSTR 4 AND CMP-08**

*Notification No- 34/2020 dated 03.04.2020*

persons shall furnish a statement, containing the details of payment of self-assessed tax in **FORM GST CMP-08** of the Central Goods and Services Tax Rules, 2017, for the quarter ending 31st March, 2020, till the 7th day of July, 2020

persons shall furnish the return in **FORM GSTR-4** of the Central Goods and Services Tax Rules, 2017, for the financial year ending 31st March, 2020, till the 15th day of July, 2020

### **NEW APPLICATION FOR COMPOSITION SCHEME FOR FY 2020-21**

*Notification No- 30/2020 dated 03.04.2020*

Person who opts to pay to tax under composite scheme may make application on or before 30.06.2020

Further such person shall file the declaration in ITC-03 on or before 31.07.2020

### **GENERAL EXTENSION OF TIME LIMIT FOR COMPLIANCE SUBJECT TO CONDITIONS**

*Notification No- 35/2020 dated 03.04.2020*

Any time limit for completion or compliance of any action, by any authority or by any person, has been specified in, or prescribed or notified under the said Act, which falls during the period from the 20th day of March, 2020 to the 29th day of June, 2020, and where completion or compliance of such action has

not been made within such time, then, the time limit for completion or compliance of such action, shall be extended up to the 30th day of June, 2020

(a) completion of any proceeding or **passing of any order** or issuance of any notice, intimation, notification, sanction or approval or such other action, by whatever name called, by any authority, commission or tribunal, by whatever name called, under the provisions of the Acts stated above; or

(b) **filing of any appeal**, reply or application or furnishing of any report, document, return, statement or such other record, by whatever name called, under the provisions of the Acts stated above;

**However above extensions shall not be applicable for**

<b>Compliance Provisions</b>	
<b>Section 10(3)</b>	<b>Lapse of Composition Scheme on Exceeding the Turnover of specified limit</b>
<b>Section 25</b>	<b>Registration</b>
<b>Section 27</b>	<b>Registration of Casual and Non Resident Taxable Person</b>
<b>Section 31</b>	<b>Issue of Invoice</b>
<b>Section 37</b>	<b>Filing of GSTR 1</b>
<b>Section 47</b>	<b>Levy of Late Fees</b>
<b>Section 50</b>	<b>Payment of Interest</b>
<b>Section 69</b>	<b>Power to Arrest</b>
<b>Section 90</b>	<b>Liability of Partners of Firm to Pay Tax</b>
<b>Section 122</b>	<b>Imposition of Penalty</b>
<b>Section 129</b>	<b>Detention, Seizure and Release of Goods/ conveyances in Transit</b>
<b>Except Section 39(4), (3), (5)</b>	<b>Filing of GSTR 6, 7, 8, 3B</b>
<b>Section 68</b>	<b>Inspection of Goods in Movement</b>

E-way bill has been generated under rule 138 of the Central Goods and Services Tax Rules, 2017 and its period of validity expires during the period 20th day of March, 2020 to 15th day of April, 2020, the validity period of such e-way bill shall be deemed to have been extended till the 30th day of April, 2020.

## **CONDITIONS FOR INPUT TAX CREDIT**

*Notification No- 30/2020 dated 03.04.2020*

The conditions prescribed in Rule 36(4) of CGST Rules 2017 for the availment of the credit of Input Tax restricting the credit upto 110% of the Invoices uploaded by the supplier has been relaxed for the tax period February, March, April, May, June, July and August, 2020.

The condition for availing the credit shall apply cumulatively instead of month to month basis