# ANALYSIS OF GSTR 2B AND ITS PRACTICAL IMPLICATIONS

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# **TOPICS**

Background of GSTR 2B

Basic understanding of GSTR 2B

Key features of GSTR 2B

Advantages of GSTR 2B

GSTR 2A vs. GSTR 2B Detailed understanding of each table of GSTR 2B

Food for thoughts

#### BACKGROUND-GSTR 2B

- GST Council, in its 39<sup>th</sup> Meeting held on March 14, 2020, recommended linking the data available in GSTN viz. linking outward supply data in <u>Form GSTR-1</u> and <u>Form GSTR-3B</u> and <u>Input Tax Credit ('ITC') data between Form GSTR-2A and Form GSTR-3B.</u>
- It was also stated that the present return system (<u>GSTR-1</u>, <u>GSTR-2A</u> & <u>GSTR-3B</u>) will be continued until September 2020.
- The Government has issued <u>Press Release</u> on August 29, 2020, and introduced Form GSTR-2B which indicates ITC available to taxpayer for relevant tax period.



## WHAT IS GSTR 2B?

- GSTR-2B is an auto-drafted Input Tax Credit (ITC) statement generated for every recipient(other than composition dealer), on the basis of the information furnished by their suppliers, in their respective
  - Form GSTR-1 (Outward Supply details) &
  - Form GSTR 5 (Non Resident Taxable Person return) &
  - Form GSTR-6 filed by Input Service Distributor.
- It is a static statement and will be made available for each month, on 12<sup>th</sup> day of the succeeding month i.e. for the month of August 2020 the statement will be generated



#### WHAT IS GSTR 2B?

- It consists of all documents filed by suppliers/ISD in their Form GSTR-1, 5 & 6 between 00:00 hours on 12th day of preceding month to 23:59 hours, on 11th day of current month. Thus, statement generated on 12th of September will contain data from 00:00 hours of 12th August to 23:59 hours of 11th September
- The details filed in GSTR-1 & 5 (by supplier) & GSTR-6 (by ISD) would reflect in the next open GSTR-2B of the recipient irrespective of supplier's/ISD's date of filing.
  - ✓ If a supplier files a document INV-1 dt. 15.08.2020 on 11th September, it will get reflected in GSTR-2B of August (generated on 12th September).
  - ✓ If the document is filed on 12th September, 2020 the document will be reflected in GSTR-2B of September (generated on 12<sup>th</sup> October).
- Instances where the return due date is later than the date of generation of GSTR 2B, it is advised to avail ITC on a self- assessment basis.

#### WHY GSTR 2B?

- The insertion of GSTR-2B on the GSTN portal is for assisting the taxpayers in reconciling and matching the Input Tax Credit periodically.
- Taxpayers can now reconcile data generated in Form GSTR-2B, with their own records and books of accounts.
- By this reconciliation, taxpayer have to ensure while filing of GSTR 3B that;
  - ✓ No credit is taken twice,
  - ✓ Credit is reversed as per law &
  - ✓ Tax on reverse charge basis is paid correctly.

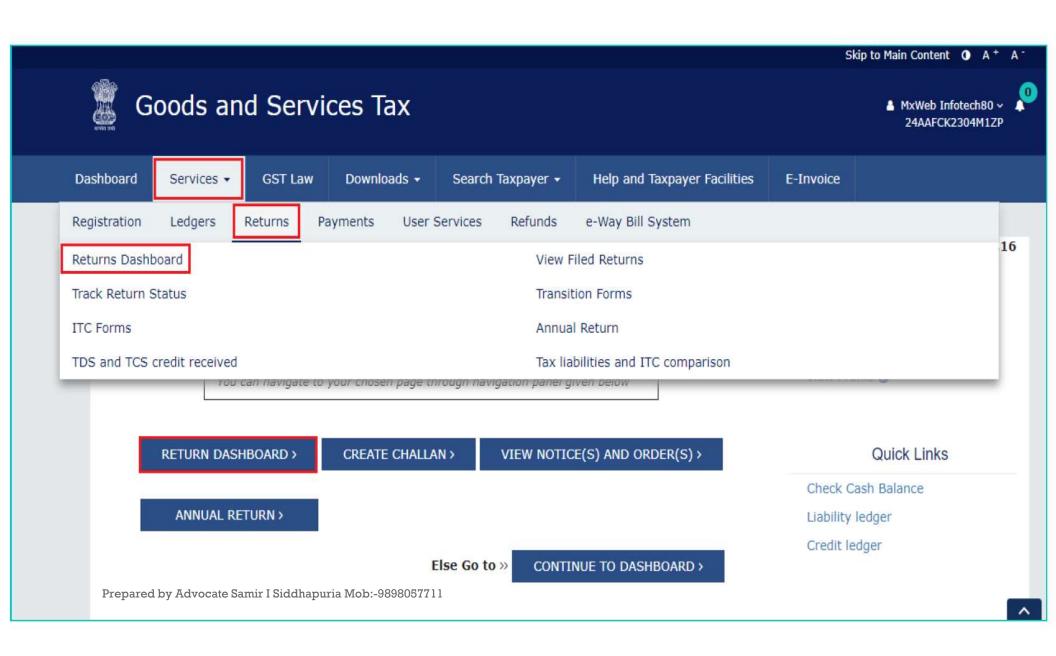


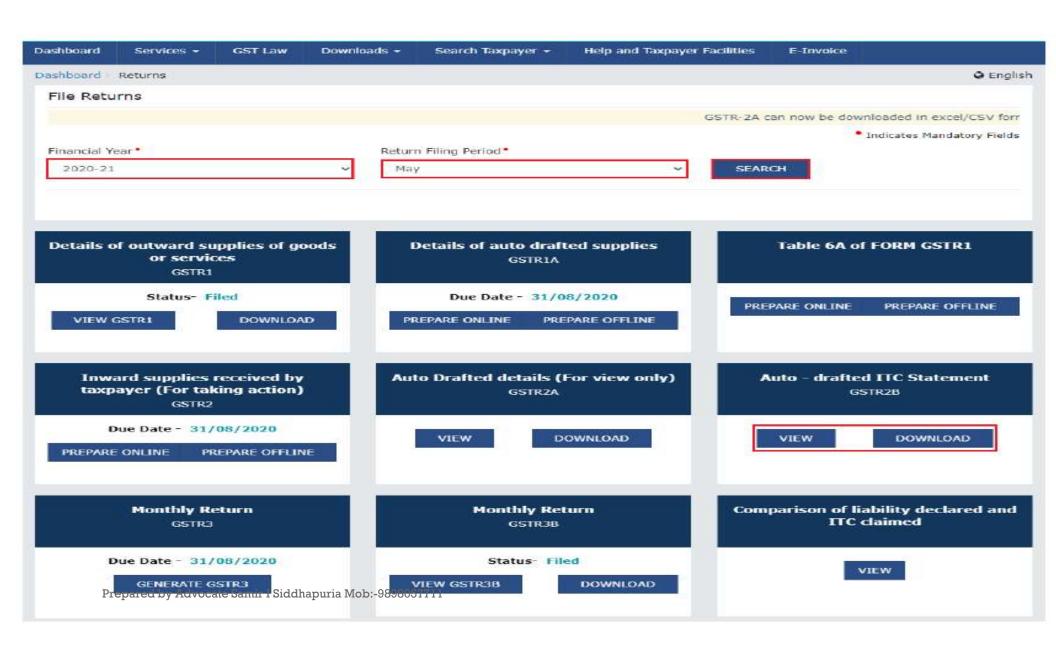
# HOW TO DOWNLOAD GSTR 2B



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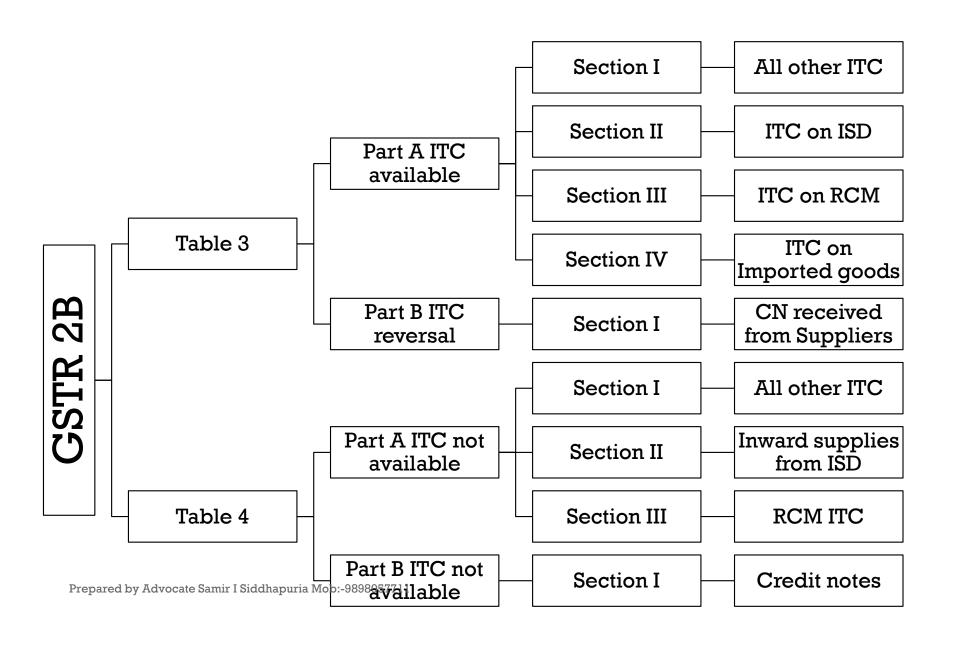




## CONTENTS OF GSTR 2B

- Summary statement showing ITC available and non-available for every section.
- Advisory for every section that clarifies the kind of action that taxpayer must take in <u>GSTR-3B</u>.
- Document-wise details such as invoices, credit notes, debit notes, etc. to view and download.
- Cut-off dates and advisory for generating and using GSTR-2B.
- Input tax credit on Import of goods and import from SEZ units/developers (available from GSTR 2B of August 2020 onwards).





## WHAT DETAILS ARE AVAILABLE IN PART A?

- The PART-A of ITC Available contains details of inward supplies (invoices, debit notes and amendments related to invoices and debit notes) and import of goods received from suppliers, in the following manner:
- All Other ITC Supplies from registered persons
  - B2B Invoices
  - B2B Debit notes
  - B2B Invoices (Amendment)
  - B2B Debit Notes (Amendment)
- Inward Supplies from Input Service Distributor/ISD
  - ISD Invoices
  - ISD Invoices (Amendment)

- Inward Supplies liable for reverse charge
  - B2B Invoices
  - B2B Debit notes
  - B2B Invoices (Amendment)
  - B2B Debit Notes (Amendment)
- Import of Goods
  - IMPG Import of goods from overseas
  - IMPG (Amendment)
  - IMPGSEZ Import of goods from SF7
  - IMPGSEZ (Amendment)

# DETAILED UNDERSTANDING PART A GSTR2B

Sr No	Table	Particulars	GSTR 3B	Remarks
1	Section	Invoice and DN including amendment filed by supplier in form GSTR 1 & 5	4(A)(5)	1.Negative value to be report in 4(B)(2) due to amendment 2.RCM not covered
2	Section II	ISD invoices including amendment	4(A)(4)	Negative value to be report in 4(B)(2) due to amendment
3	Section III	RCM liability from RP suppliers	3.1(d) & 4(A)(3)	Not covered RCM on Importation of service and RCM On URP
4	Section IV	IGST on importation of goods and SEZ based on BE including amendment	4(A)(1)	1.Available after august 2020 2. Import through courier not covered 3.Difference between bill of entry date and ICEGATE refence date provided

# WHAT DETAILS ARE AVAILABLE IN PART B ITC AVAILABLE?

- The PART-B of ITC Reversal contains details of credit notes and amendments thereof issued by the suppliers or ISD, in the following manner:
  - B2B Credit Notes
  - B2B Credit notes (Amendment)
  - B2B Credit Notes (Reverse charge)
  - B2B Credit notes (Reverse charge) (Amendment)
  - ISD Credit notes
  - ISD Amendment Credit notes

Sr No	Table	Particulars	GSTR 3B	Remarks
5		CN received including amendment by GSTR 1,5 & 6	4(B)(2)	Negative value- reclaim with subject to reversal made earlier



## WHAT IS NOT AVAILABLE ITC IN GSTR 2B?

- "ITC Not available" in Table 4, Part A covers the following scenarios only:
  - I. Invoice or debit note for supply of goods or services or both where the recipient is not entitled to input tax credit as per the provisions of subsection (4) of Section 16 of CGST Act, 2017.
  - II. Invoice or debit note where the Supplier (GSTIN) and place of supply are in the same State while recipient is in another State.
- However, there may be other scenarios for which input tax credit may not be available to the taxpayers and the same has not been generated by the system.
- Taxpayers, are advised to self-assess and reverse such credit in their FORM GSTR-3B.



# EXAMPLE OF ITC AVAILABLE AS PER SEC.16(4)

Sr No	Invoice Date	Reported in GSTR 1 for the month	Date of filing of GSTR 1	CESTR NR	ITC available or not as per GSTR 2B
1	22-08-2020	Aug-20	11-09-2020	Aug-20	ITC available
2	22-08-2020	Aug-20	11-10-2020	Sep-20	ITC available
3	15-12-2019	Sep-20	11-10-2020	Sep-20	ITC available
4	15-12-2019	Sep-20	20-10-2020	Oct-20	???
5	15-12-2019	Sep-20	12-11-2020	Nov-20	ITC not available

Proviso to Sec 37(3) & Sec.39(9) speaks that rectification in GSTR 1 is permissible till filing of September Return or annual return. Sec.16(4) also speaks that ITC for previous FY can be taken before filing of annual return or September return of the said FY. However, PSTR-2B shows the same in ITC NOT AVAILABLE.



### EXAMPLE OF ITC AVAILABLE ON THE BASIS OF POS

Sr No	Supplier Place of Recipient Tax Charged Supply		ITC available or not		
1	Gujarat	Gujarat	Gujarat	CGST & SGST	ITC available
2	Gujarat	Gujarat	MP	CGST & SGST	ITC not available
3	Gujarat	MP	MP	IGST	ITC available
4	Gujarat	MP	Gujarat	IGST	ITC available



# WHAT DETAILS ARE AVAILABLE IN PART A OF ITC NOT AVAILABLE?

- The PART-A of ITC Not Available contains details of inward supplies (invoices, debit notes and amendments related to invoices and debit notes) received from suppliers, in the following manner:
  - 1.All Other ITC Supplies from registered persons
    - B2B Invoices
    - B2B Debit notes
    - B2B Invoices (Amendment)
    - B2B Debit Notes (Amendment)
  - 2.Inward Supplies from Input Service Distributor/ISD
    - ISD Invoices
    - ISD Invoices (Amendment)
  - 3. Inward Supplies liable for reverse charge
    - B2B Invoices
    - B2B Debit notes
    - B2B Invoices (Amendment)

Prepared by AdB2BsamDebitaNotes: (Amendment)



# WHAT DETAILS ARE AVAILABLE IN PART BOUT ITC NOT AVAILABLE?

- The PART-B of ITC Not Available contains details of credit notes and amendments thereof issued by the suppliers or ISD, in the following manner:
  - B2B Credit Notes
  - B2B Credit notes (Amendment)
  - B2B Credit Notes (Reverse charge)
  - B2B Credit notes (Reverse charge) (Amendment)
  - ISD Credit notes
  - ISD Amendment Credit notes



# LEGAL VALIDITY OF GSTR 2B

GSTR 2B is not backed by any provision of GST Act and Rule.
It is started on trial basis from July 2020.
GST Council and Portal has inserted the GSTR 2B by using excessive powers.
To function of the same effectively for subsequent period GST law is required to be amended.

## ADVANTAGES OF GSTR 2B

- GSTR 2B summary reports helps to give overview for the month to the taxpayer based on ITC available and not available statement.
- A clear picture of ITC to be availed for the period.
- To comply with rule 36(4) reconciliation of ITC ledger and invoice details uploaded in GSTR 1 by the supplier
- Find out missing invoice or bill of entry available on ICEGATE and not in records
- Rule 36(4) reconciliation would not be required to be performed on year to date basis every month as the GSTR 2B report is static.
- GSTR 2B data not required to be <u>downloaded repetitively</u> like GSTR 2A.
- To identify vendors are compliant or non complaints.

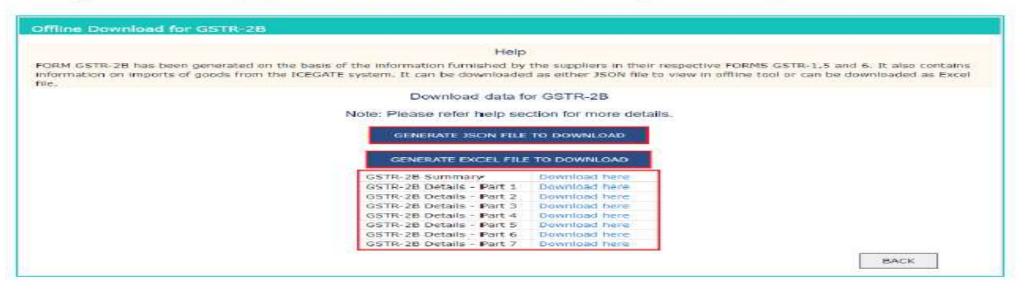


- Documents in all table exceeds 1000 counts:
  - ✓ Taxpayers may download the EXCEL/JSON from the GSTR-2B download page, by using the link given in the information message below the summary table.
  - √The download button will be disabled in view mode in case documents are
    more than 1000 in all table.
  - ✓ However, specific document can view if GSTIN number, Invoice Number, and Invoice Date is entered.(in Return Dashboard>Select Tax Period>GSTR 2B View> Summary/ALL Tables).





3.2. Click the GENERATE JSON FILE TO DOWNLOAD button to generate data in the JSON format to view in Offline Matching Tool or click the GENERATE EXCEL FILE TO DOWNLOAD button to generate data in the excel format.



- 4. View GSTR-2B
- 4.1. In the Form GSTR-2B tile, click the VIEW button.

Note: If nymber of documents across all tables of Torm GSTR-2B is less than 1000, then you can view the document details directly on GST Portal.

- Data can be filter by using filter option:
  - ✓ The filter option available at document wise view option.
  - It can be used to filter based on the following criteria.
  - Data can be downloaded after filter also.
    - Invoice/Note/ISD Document date/Bill of entry Date,
    - Note Type: Credit note and Debit note
    - Invoice type/Note Supply type Regular, Deemed Exports, SEZ Supplies (with or without payment of tax), and Intrastate supplies attracting IGST.
    - ISD Document type
    - Supply attract reverse charge Yes/ No,
    - GSTR 1/5 filing date,
    - ITC availability Yes / No,
    - Applicable % of Tax rate .



- Availability of various types of data: Summary level data, invoice level data and vendor level data would be available for view on the portal and download in excel too.
- Viewing documents per page –Maximum100 or < 100 documents can be viewed at once by user.
- Display/Hide column in view mode: A specific column can be hidden or displayed on the portal which could be helpful for further analysis.
- Expand/Collapse:
  - 1. All sections are in collapse mode by default.
  - 2. In view mode all sections can expand or collapse.
  - 3. User can reach to invoice level data after selection option of expanding sections and subsections.
- Date of filing by supplier: It is possible with the GSTR 2B that recipient can view the filing date of GSTR 1 filed by the supplier of goods and services or both.

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#### Search:

User can search any documents by using search functionality. Alphanumeric as well as some special character i.e. /, ',., are allowed.

#### GSTR 3B table reference:-

Summary of each table in view mode as well as downloaded in excel form is giving reference of GSTR 3B table whereby user can identify that ITC can be availed or not particular Invoice

#### View /Download:-

GSTR 2B can view or download on single click without waiting period of 20 mins





#### 4.2. The Form GSTR-2B – AUTO DRAFTED ITC STATEMENT page is displayed. Form GSTR-2B has two tabs as SUMMARY and ALL TABLES.



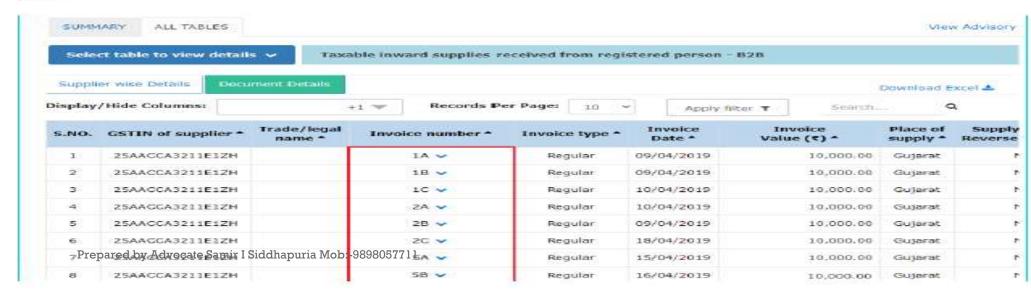
Supplies from/type	Criteria		
Normal taxpayer filing at monthly frequency	All GSTR-1 filed between 12-May-2020 to 11-Jun-2020		
Normal taxpayer filing at quarterly frequency	All GSTR-1 filed between 14-May-2020 to 13-Jun-2020		
Non Resident Taxpayer	All GSTR-5 filed between 14-May-2020 to 13-Jun-2020		
Input service distributor	All GSTR-6 filed between 14-May-2020 to 13-Jun-2020		
Import from overseas	NA		
Import from SEZ	NA		

4.4. On click of the hyperlinks provided in the headings column of Form GSTR-2B summary, you can navigate in details in the GSTR-2B table and view pre-filtered document details.



TIC ov	allable ITC not available					HELP O
s.No.	Heading [Expand All ~]	GSTR-3B table	Integrated Tax (₹)	Central Tax (†)	State/UT Tax (<)	Cess (₹)
Part A	ITC Available - Credit may be daimed in relevant hear	dings in GSTR-3B				
1	All other ITC - Supplies from registered persons .	4(A)(5) 0	33,320.00	0.00	0.00	150.00
	828 - Involces	9,600.00	0:00	0.00	80.0	
	828 - Debit notes		7,200.00	0.00	0.00	67.0
	B2B - Invoices (Amendment)	2,250.00	0.00	0.00	0.0	
	B2B - Debit notes (Amendment)		14,270.00	0.00	0.00	3.0
11	Inward Supplies from ISD 🐱	4(A)(4) 0	0.00	0.00	0.00	0.0
III	Inward Supplies liable for reverse charge. 🗸	3.1(d) -4(A)(3) <b>G</b>	16,225.00	0.00	0.00	85.0
IV	Import of Goods 🕶	4(A)(1) 0	0.00	0.00	0.00	0.0

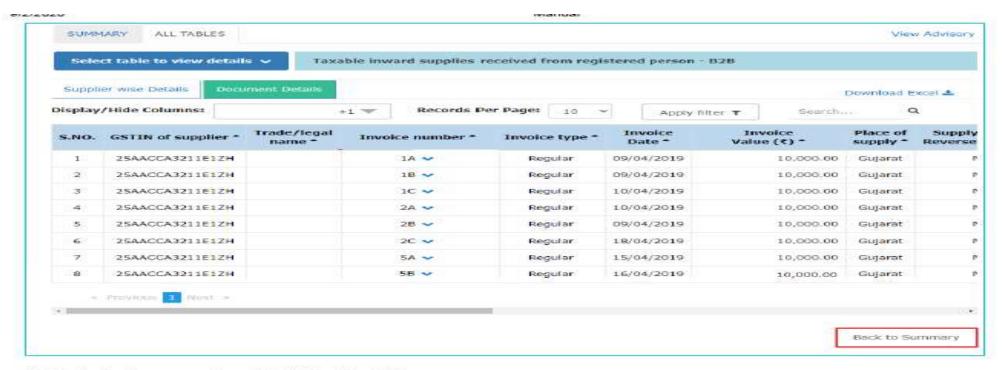
4.6. You will be navigated to Documents Details under ALL TABLES tab for that particular section. You can view pre-filtered document details of inward supplies received from registered persons which is Other than reverse charge and ITC availability is yes.





4.8. Click the Invoice number hyperlink to view the details of tax. The Tax details are displayed.



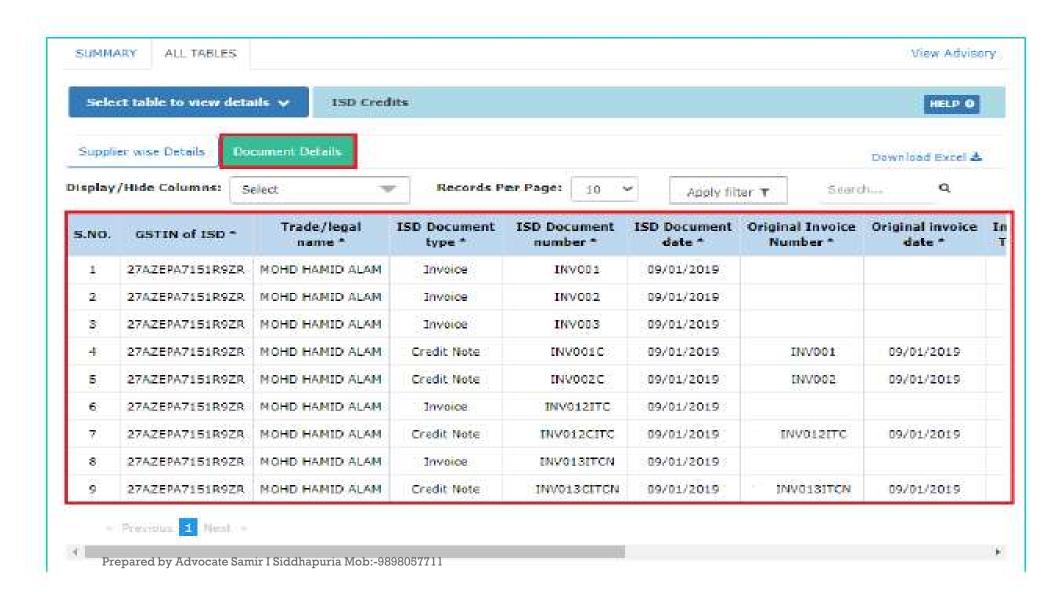


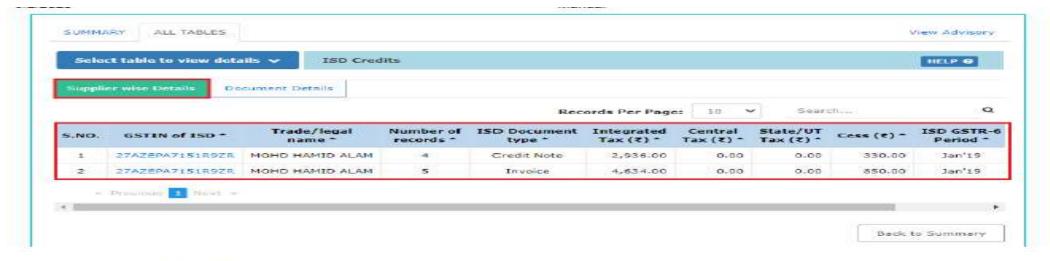
Note: Similarly, you can view details for other tables.

#### ALL TABLES TAB

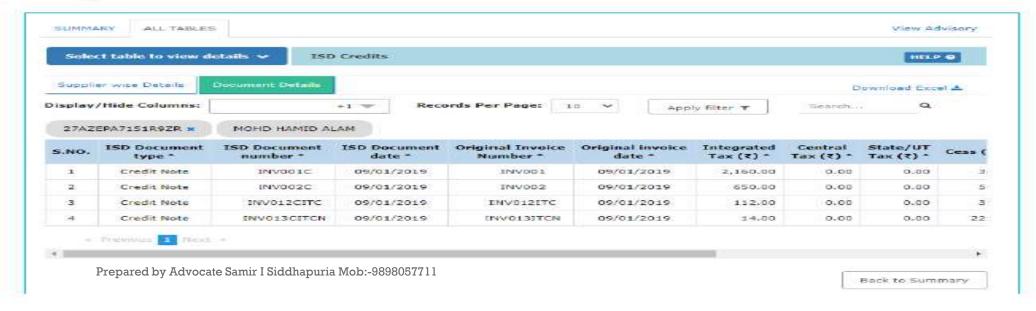
4.10. Click ALL TABLES tab to select an appropriate table from the drop-down list to view details.







4.13. On Click of GSTIN hyperlink, you can navigate to Document details tab and view documents received only from the said supplier.



Points of Comparison	GSTR-2A	GSTR-2B
Nature of Statement	It is dynamic and changing everyday as and when suppliers file GSTR1.	Remains static or constant, as the GSTR-2B for one month cannot change based on future actions of the supplier.
ITC on Import of Goods	Details not available	Information of IGST Paid on imported goods and SEZ units are available from ICEGATE
ITC Reversal	ITC reversal details not contained in GSTR 2A.	GSTR-2B contains the details of ITC required to be reversed only in limited specified cases.
GSTR- 1 / 5 filing date and period	GSTR-2A does not contain the GSTR – 1 / 5 filing date and period against each supplier.	GSTR-2B contains the GSTR – 1 / 5 filing date and period against each supplier.
Supplier wise information	GSTR-2A does not contain the supplier wise information. It provides the information invoice/ document wise only.	GSTR-2B contains the supplier-wise as well invoice/document wise information.
Source	GSTR-1, GSTR-5, GSTR-6, GSTR-7, GSTR-8	GSTR-1, GSTR-5, GSTR-6, ICEGATE system
Auto population of data on submission of return	Data in GSTR-2A get populated merely on submission of GSTR- 1.	Data in GSTR-2B get populated after filing of GSTR-1.
Periodicity  Prepared by Ad	GSTR-2A is a dynamic/ periodic statement which includes data on the basis of date of invoices.	GSTR-2B is a monthly statement which includes data for every return which is filed during a particular period.

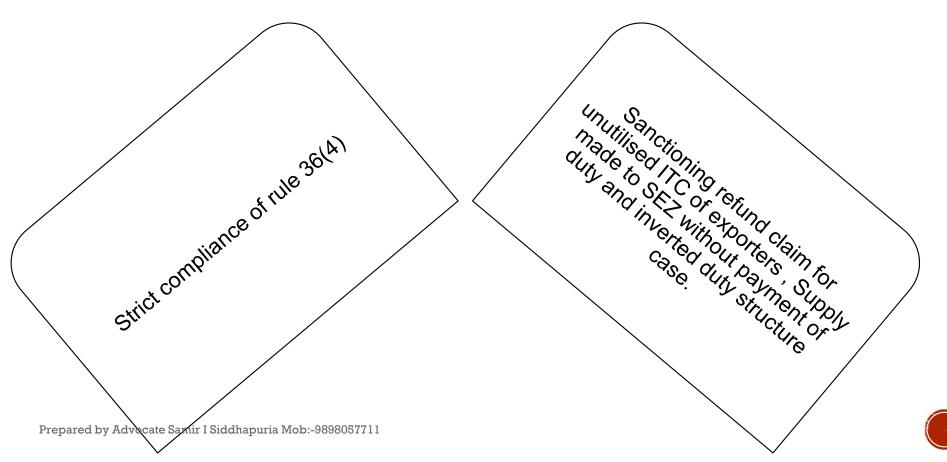
# EXAMPLE OF GSTR 2A VS GSTR 2B

Sr No	Invoice Date	Reporting in GSTR 1 for the month	Date of filing of GSTR 1	GSTR 2A	GSTR 2B
1	22-08-2020	Aug-20	11-09-2020	Aug-20	Aug-20
2	22-08-2020	Sep-20	11-10-2020	Sep-20	Sep-20*
3	22-08-2020	Aug-20	11-10-2020	Aug-20	Sep-20*

\*ITC deferred due to late reporting and filing of GSTR 1



#### GSTR 2B FROM DEPARTMENTAL PERSPECTIVE



## FOOD FOR THOUGHT

- Do Taxpayer needs file GSTR 2B?
  - ✓ No Taxpayer needs not to file GSTR 2B as it auto drafted form.
- Whether data uploaded but not submitted would appear in GSTR 2B?
  - ✓ GSTR 2B captured data of GSTR 1,5 & 6 filed by suppliers and therefore data uploaded but not submitted would not appear in GSTR 2B.
- When ITC can be availed on the invoices or debits issued by the supplier who is filing GSTR 1 on quarterly basis?
  - ✓GSTR 2B is bifurcating ITC available and not available based on GSTR1 filed by suppliers and hence it is blocking ITC on the invoice issued by supplier who are filing GSTR 1 on quarterly basis.
- Whether tax payer can amend GSTR 2B or not?
  - ✓No taxpayer cannot make any change in GSTR 2B for the documents of any error or omission made by supplier.

# CLARIFICATIONS REQUIRED

Whether GST Act is amended to enact GSTR 2B in the statue?

If GST Act is not amended then department will issue notices for reversal of ITC on the basis of GSTR 2B?

Tax payers needs to strictly follow GSTR 2B or not?

## CHALLENGES

#### Reconciliations issues continued and increased

- ✓ GSTR-2B vs ITC as per Books of Accounts,
- ✓ GSTR-2A vs GSTR-2B,
- ✓ GSTR-2A vs ITC as per Books of Accounts,
- ✓ITC as per GSTR-2B Vs ITC as per GSTR-3B

#### Blockage of ITC

✓ GSTR 2B is reflecting entry of GSTR 1 timely filed and therefore blocking ITC in the hands
of recipient for late filing of GSTR1 and quarterly filing of GSTR 1.

#### Ineligible ITC

✓ Ineligible ITC captured only with limited criteria and therefore taxpayer have to check other criteria prescribe in sec.17(5) which are blocking ITC.

#### RCM on inward supplies from URP

✓ GSTR 2B only showing RCM liability from RP and not showing URP

#### 10% capping of ITC as per rule36(4)

✓ The Government will continue to allow claim ITC of 10% which are not appearing in GSTR Pre-2B after enactment of provision for GSTR 2B. Let's wait...





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#### **Speaker**:-

Advocate Samir I Siddhapuria has authored many books-

- **❖Gujarat VAT Act,2003**
- **❖Gujarat VAT And Works Contract-**
- **❖Multistate Works contract-**
- ❖VAT Diary 2007
- Has delivered various lecture before Trade and Industries and at various professionals Association.
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