E-invoicing in India!

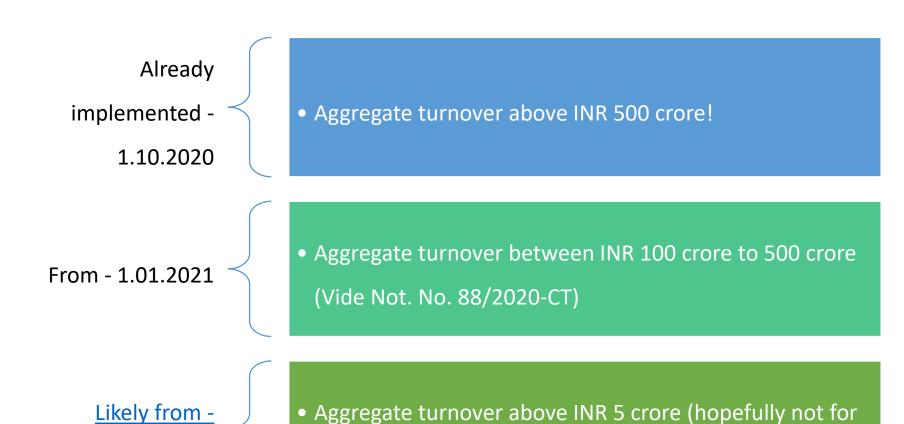
Concept and Challenges!

[11th November 2020]

CA Pritam Mahure and Associates

E-invoicing — Status update!

01.04.2021



below 5 crore taxpayers!)

E-invoicing applicable for above INR 100 crore turnover from 1.01.2021 [Not. No. 88/2020-CT]

[भाग II—खण्ड 3(i)]

भारत का राजपत्र : असाधारण

NOTIFICATION

New Delhi, the 10th November, 2020

No. 88/2020-Central Tax

G.S.R. 704(E).—In exercise of the powers conferred by sub-rule (4) of rule 48 of the Central Goods and Services Tax Rules, 2017, the Government, on the recommendations of the Council, hereby makes the following further amendments in the notification of the Government of India in the Ministry of Finance (Department of Revenue), No. 13/2020 – Central Tax, dated the 21st March, 2020, published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i) vide number G.S.R. 196(E), dated 21st March, 2020, namely:-

In the said notification, in the first paragraph, with effect from the 1st day of January, 2021, for the words "five hundred crore rupees", the words "one hundred crore rupees" shall be substituted.

[F. No. CBEC-20/06/04/2020-GST]

PRAMOD KUMAR, Director

Note: The principal notification No. 13/2020 – Central Tax, dated the 21st March, 2020 was published in the Gazette of India, Extraordinary, vide number G.S.R. 196(E), dated 21st March, 2020 and was last amended vide notification No. 70/2020-Central Tax, dated the 30th September, 2020, published vide number G.S.R. 596(E), dated the 30th September, 2020.

27

E-invoicing – How it has fared?

How e-invoicing has fared in India from 1.10.2020?

4.95 crore e-invoices

Raised by 27,400Taxpayers

8.4 lakhs e-invoices

 Raised on 1.10.2020 i.e. first day itself

35 lakhs e-invoices

• Raised on 31.10.2020

85% of the Taxpayers

 Used API to raise einvoices

15% of the Taxpayers

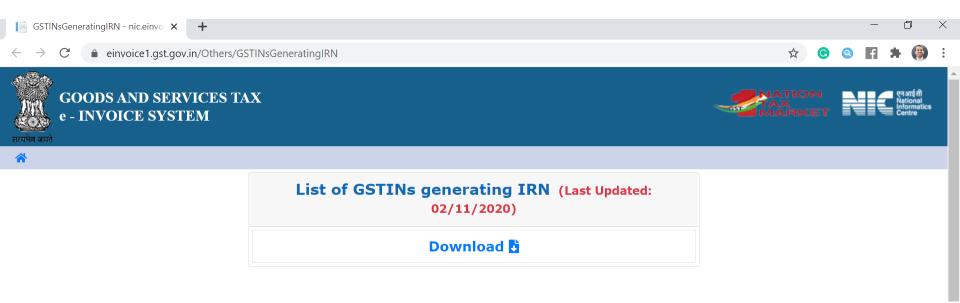
Used offline tool to raise e-invoices

List of e-invoice registered suppliers!

NIC has issued list of GSTINs who have issued #e-invoices.

The list is available at:

https://einvoice1.gst.gov.in/Others/GSTINsGeneratingIRN



E-invoicing – Press Releases and Update!

Press Release dated 2nd Nov. 2020

- 'The Government is planning to reduce the aggregate turnover cut off to Rs

 100 Crores for generation of IRN by the tax payers in coming days. NIC has

 already enabled the API and offline tool based trial sites for these tax payers

 and geared up with the required infrastructure to handle the generation of e
 invoices from these tax payers.
- Keeping requirements of small tax payers in view, who need to prepare 5-10 B2B invoices in a day, NIC is also developing an offline Excel based IRN preparation and IRN printing tool which will allow them to enter the invoice details, prepare the file to upload on NIC IRN portal, download the IRN with QR code and print the e-invoice with QR code.'

Attention - Entities with turnover above 100 crore!

- E-Invoice System is **enabled on Trial sites** (for APIs & Offline tools) for taxpayers with PAN based **turnover more than Rs. 100 Cr.** in a financial year
 - https://einv-apisandbox.nic.in
 - https://einvoice1-trial.nic.in



<u>Tax Payers with Aggregate Turnover of Company less</u> than Rs. 500 Crores - E-invoice API Access Mechanism

- Through GSPs The GSTIN (Tax Payer) generates his own username and password and ties up with GSPs to get the access to API using the Client Id and Client Secret of the GSPs.
- Through ERPs The GSTIN (Tax Payer) generates his own username and password and ties up with ERPs to get the access to API using the Client Id and Client Secret of the ERPs.
- Through Companies having direct Access to APIs' If the tax payer has tie up or using the ERP of the 'Company which has direct access to API, then he/she can use the API through that company. The GSTIN (Tax Payer) generates his own username and password and gets the access to API using the Client Id and Client Secret of the Company, which has access.
- Tax Payers having access to E-Way Bill APIs If the tax payer has direct access to E-Way
 Bill APIs, then he/she can use the same Client Id, Client Secret, username and password to
 get the access to e-Invoice system.

Future e-nspector!

Near future!

- e-Invoicing related exemptions could be withdrawn (for banking, insurance, SEZ unit, ISD etc)
- e-Invoicing for all documents (Bill of Supply, Delivery Challan etc)
- e-Invoicing for B2C

Distinct future!

- e-Purchase Orders / Agreements?
- e-Payments?

E-invoicing – What to do?

E-invoicing – What to do?

As a supplier

Is it applicable?

- If yes, comply!
- If no, keep track of future phases!

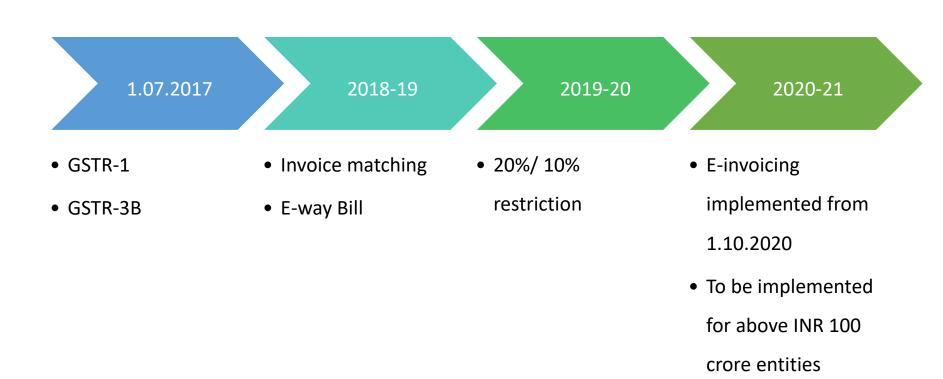
As a recipient

Is it applicable to vendors?

- If yes, make them comply!
- If no, keep track of future phases!

E-invoicing — Evolution!

E-invoicing — Evolution



E-invoicing - Evolution!

1.10.2020

- For above INR 500 crore entities
- Waiver upto 31st October 2020

(refer Not. No. 73/2020)

1.01.2021

• For above INR 100 crore entities

Relaxation from 1st October 2020 to 31st October 2020 [Not. No. 73/2020]

...hereby notifies the registered persons required to prepare the tax invoice in the manner specified under sub-rule (4) of rule 48 of the Central Goods and Services Tax Rules, 2017, who have prepared tax invoice in a manner other than the said manner, as the class of persons who shall, during the period from the 1st day of October, 2020 to the 31st day of October, 2020, follow the special procedure such that the said persons shall **obtain an Invoice Reference Number** (IRN) for such invoice by uploading specified particulars in FORM GST INV-01 on the Common Goods and Services Tax Electronic Portal, within thirty days from the date of such invoice, failing which the same shall not be treated as an invoice.

E-invoicing Press Release dated 30.09.2020!

- 2.2. The same is illustrated with an example: In case a registered person has issued an invoice dated <u>3rdOctober</u>, <u>2020</u> without obtaining IRN but reports the details of such invoice to IRP and obtains the IRN of the invoice <u>on or before 2ndNovember</u>, <u>2020</u> then it shall be deemed that the provisions of rule 48 (5) of the CGST Rules, 2017 are complied with and the penalty imposable under section 122 of the CGST Act, <u>2017</u> shall also stand waived. Relevant notifications would follow.
- 3. It may be noted that **no such relaxation** would be available for the invoices issued **from 1st November 2020** and such invoices issued in violation of rule 48(4) of the CGST Rules

 2017 would not be valid and all the applicable provisions of CGST Act and Rules would apply for the said violation.

E-invoicing — Concept!

E-invoicing

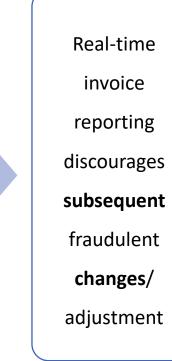
Electronic invoicing (also called **e-invoicing**) is a form of electronic billing.

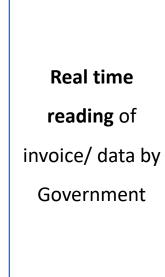
E-invoicing methods are used by trading partners, such as customers and their suppliers, to present and monitor transactional documents between one another and ensure the terms of their trading agreements are being met

https://en.wikipedia.org/wiki/Electronic invoicing

E-invoicing – Why preferred?

E-invoicing is increasingly mandated by Governments across the world, particularly due to GST/VAT evasion





Machines can read e-invoices

E-invoicing — Globally!

E-Invoicing — Globally!

South Korea

- Introduced in 2011
 and mandated for
 most of the
 taxpayers from
 2014
 - Transition Phase -3 years

Germany

- Framework shared in 2017
 - At present,evolving

European Union

• EU is also

recommending e-

invoicing

(EU Directive

2014/55/EU and EN

1693 standard)

Invoices – Globally!

Globally, number of invoices are likely to encompass 550 billion p.a.

In 2019, 55 billion
(approx.) invoices were
exchanged on a paperless
basis (Billentis-Compacer
Study)

Invoicing in India

Invoice - 'Pulse' of business!



Relevant Provisions!

Act

- Section 2 (66)
- Section 31
- Section 16
- Interest, penal provisions etc

Rules

- Rule 46
- Rule 46A (TI-cum-BoS)
- Rule 48 (Manner)
- Rule 49 (BoS)
- Rule 54 (Special cases)
- Rule 138A (E-way bill)

Notifications

- 2019
 - Not. No. 31
 - Not. No. 68 to 72
- 2020
 - Not. No. 2/2020
 - Not. No. 13 and 14
 - Not. No. 60 and 61
 - Not. No. 70 to 73
 - Not. No. 88

Web

- https://einvoice1.gst.gov.in/
- https://einvapisandbox.nic.in
- https://einvoice1trial.nic.in

Invoice in GST - Supplier

Meaning **Supplier** Rules

- Section 2 (66)
 - "Invoice" or "tax invoice" means the tax invoice referred to in section 31 [Sec. 2 (66)]
- Tax invoice includes revised invoice [Sec. 31]
- Section 31 Tax invoice
 - A registered person supplying taxable goods/ taxable services
 shall.. issue tax invoice
 - Provided... by notification... specify... invoice shall be issued,
 within such time and in such manner as may be prescribed
- **46.** Tax invoice <u>Subject to rule 54</u>, a tax invoice referred to in section 31 <u>shall be issued</u> by the registered person <u>containing</u> the following particulars, namely...
- 54. Tax invoice in special cases

Amendments – Not. No. 72/2020 dated 30.09.2020

Rule 46
[Tax Invoice]

• "(r) Quick Response code, having embedded Invoice
Reference Number (IRN) in it, in case invoice has been issued
in the manner prescribed under sub-rule (4) of rule 48."

Rule 138A
[Documents and devices to be carried by a person-in-charge of a conveyance]

• "(2) In case, invoice is issued in the manner prescribed under sub-rule (4) of rule 48, the Quick Response (QR) code having an embedded Invoice Reference Number (IRN) in it, may be produced electronically, for verification by the proper officer in lieu of the physical copy of such tax invoice.".

Rule 48 - Manner of issuing invoice

...

(4) The invoice shall be prepared by such class of registered persons as may be notified by the Government, on the recommendations of the Council, by including such particulars contained in **FORM GST INV-01** after obtaining an **Invoice Reference Number** by uploading information contained therein on the Common Goods and Services Tax **Electronic Portal** in **such manner** and subject to such conditions and restrictions as may be specified in the notification.

["Provided that the Commissioner may, on the recommendations of the Council, **by notification, exempt** a person or a class of registered persons from issuance of invoice under this sub-rule for a specified period, subject to such conditions and restrictions as may be specified in the said notification.".]* [*vide Not. No. 72/2020-CT]

(5) Every invoice issued by a person to whom sub-rule (4) applies in any manner other than the manner specified in the said sub-rule shall **not be treated as an invoice**

Recipient – Implications!

Section 16 Eligibility and conditions for taking input tax credit.

•••

- (2) Notwithstanding anything contained in this section, **no registered person shall be** entitled to the credit of any input tax in respect of any supply of goods or services or both to him **unless**:
 - (a) he is in possession of a tax invoice or debit note ... (Section 16)

Buyers, beware!

1st October 2020 onwards

Track suppliers for

whom e-invoice is

applicable!

Get the IRN from

supplier at the earliest

(if not issued on real

time basis)!

1st November 2020 onward

For above INR 500

crore entities, get e-

invoices with QR code

on **real time basis**!

Future

For above INR 100

crore entities, get e-

invoices with QR code

from 1.01.2021!

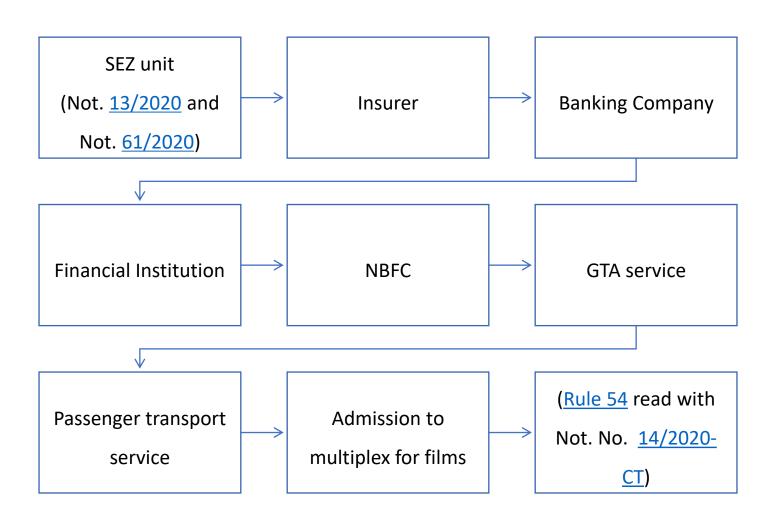
Track future phases for

smaller taxpayers!

E-invoicing

Not applicable to whom?

Exemption from e-invoicing!



Exemption from e-invoicing!

SEZ

 Exclusion is for 'SEZ unit' and not 'SEZ Developer'

Banking etc

Its qua the 'entity' (updated FAQs)

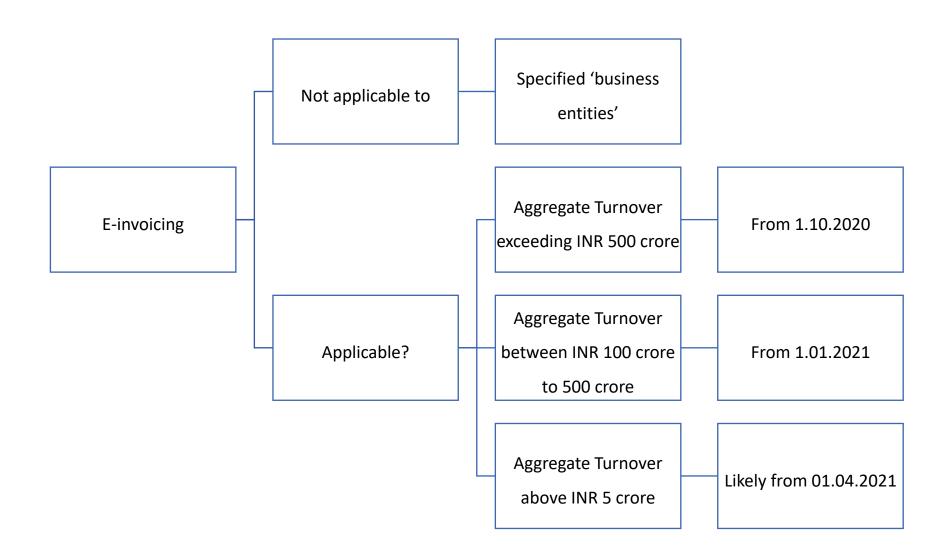
ISD

• Not applicable

E-invoicing

Applicable to whom?

Is it applicable to everyone?



'Aggregate Turnover' - Meaning!

- Section 2(6) of the CGST Act
 - "(6) "aggregate turnover" means the aggregate value of all taxable supplies

 (excluding the value of inward supplies on which tax is payable by a person

 on reverse charge basis), exempt supplies, exports of goods or services or

 both and inter-State supplies of persons having the same Permanent

 Account Number, to be computed on all India basis but excludes central

 tax, State tax, Union territory tax, integrated tax and cess; "

FY and exports! [Not. No. 13/2020 amended vide Not. No. 70/2020

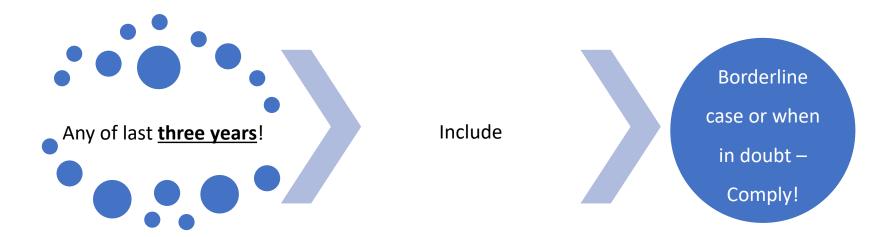
Any FY from FY 2017-18!

 "...aggregate turnover in a financial year any preceding financial year from 2017-18 onwards exceeds..."

Exports to be counted!

"...in respect of supply of goods
 or services or both to a
 registered person or for
 exports"

Aggregate Turnover!



- Exempt supplies
- Exports
- Supply to distinct
 persons (Look beyond
 Financials or GST
 returns!)

Email from GSTN being received!

Dear Taxpayer,

With reference to the Ministry of Finance (Dept of Revenue), Govt of India, CBIC Notifications Number 60/2020 and 61/2020 dated 30th July 2020, it is informed that **your company is having an annual turnover of greater than INR 500 crores*** for the **financial year 2019-2020** and hence is applicable to issue electronic invoices (e-invoice) from 01st October 2020, as per the notified e-invoice schema version 1.1. Your company will be required to issue only electronic invoices for all Business-to-Business (B2B) transactions (as per the notified schema) which will first need to be registered with the Invoice Registration Portal (IRP), so as to be considered as valid business transactions.

This mail is also to inform you that GSTN is providing a **testing environment** (sandbox) where you may test your respective ERP system / invoicing generation systems to practice the registering of your e-invoices on the Invoice Registration Portal (IRP).

^{*} In next phases, similar emails may be received by taxpayers having turnover above INR 100 crores

Email from GSTN being received!

This sandbox for testing has already been provisioned at this link: https://einv-apisandbox.nic.in/
. All technical details can be accessed at this portal as also the concept and the FAQs on the proposed e-invoice mechanism.

GSTN will be **hand-holding and guiding** the industry through meetings / interactive webinars so that all the applicable businesses are enabled and ready to adopt the notified e-invoice for compliance well before the due date of 01st Oct 2020. The details of such interactions will be intimated through various communication channels, which you may attend to be ready to comply with the e-invoice mandate.

(You are requisted to keep checking your junk folder or spam folders for mails from GSTN for the notices on these webinars/meetings). Thanking you,

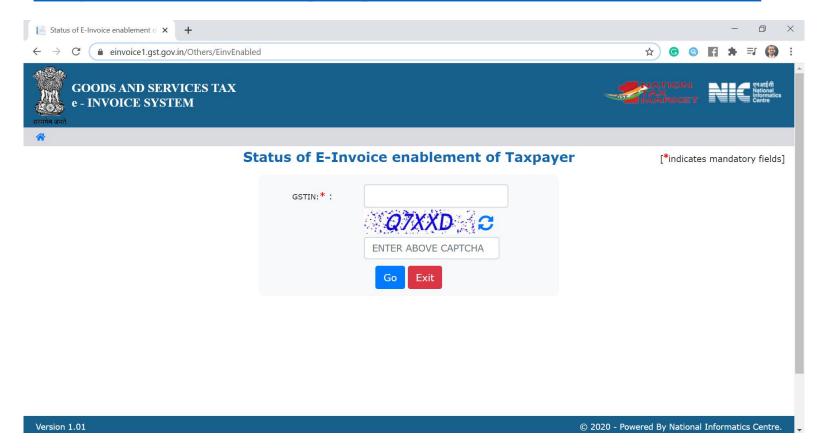
Team GSTN

Clarification on e-invoice!

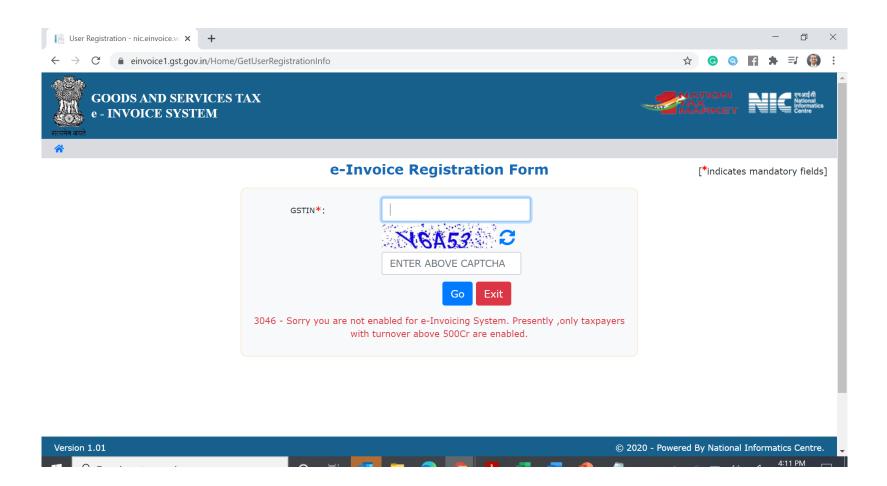
- The tax payer can come to **know** his eligibility for generation IRN by going to the e-invoice portal and selecting 'e-invoice status of Tax Payer' under Search option. On entry of the GSTIN, the system will indicate whether this GSTIN is enabled/notified for the IRN generation
 - https://einvoice1.gst.gov.in/Documents/eInvoice process.pdf

You may check!

https://einvoice1.gst.gov.in/Others/EinvEnabled

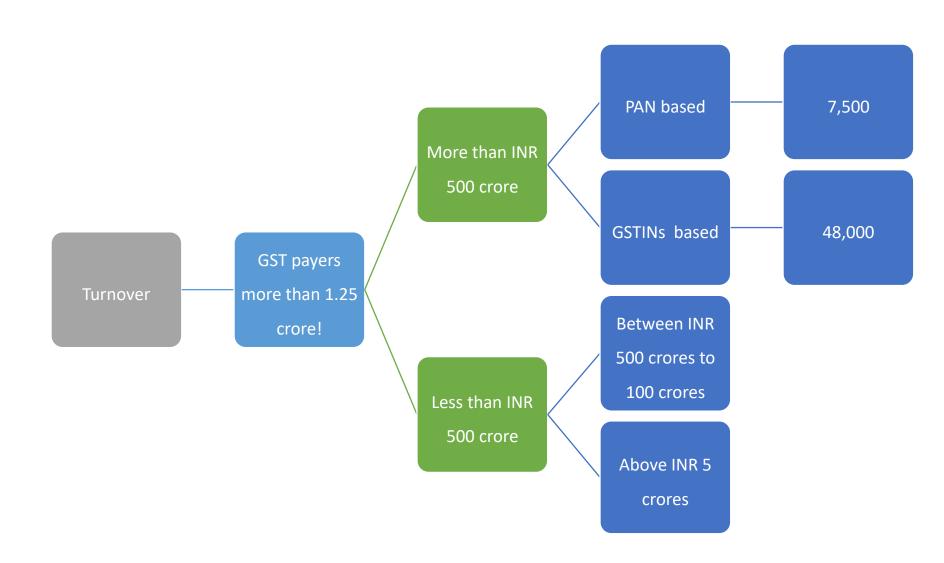


If below threshold!



Which entities are likely to be affected?

Likely impacted taxpayers in India!

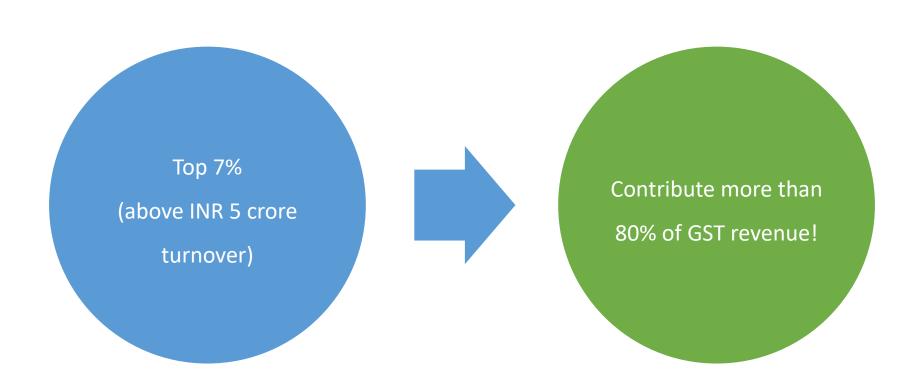


E-invoice registered suppliers - 28K!

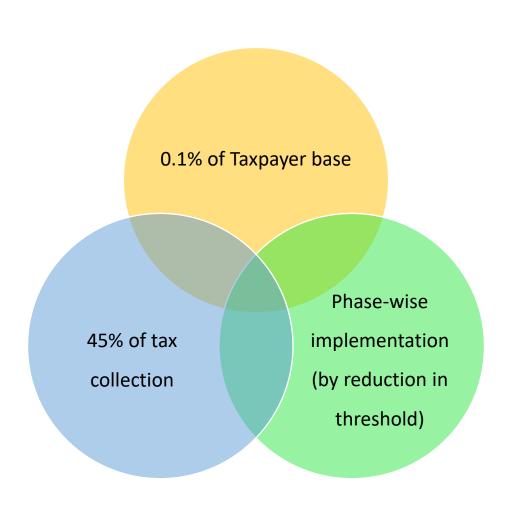
- NIC has issued list of GSTINs who have issued e-invoices (i.e. entities above INR 500 crore turnover)
 - https://lnkd.in/e_pzi5p

- Remaining 20K taxpayers?
 - What if turnover of last three years is considered?

GST Revenue – Pareto analysis!



Likely impacted taxpayers in India!



Impacted entities – Almost everyone!



Types of documents!

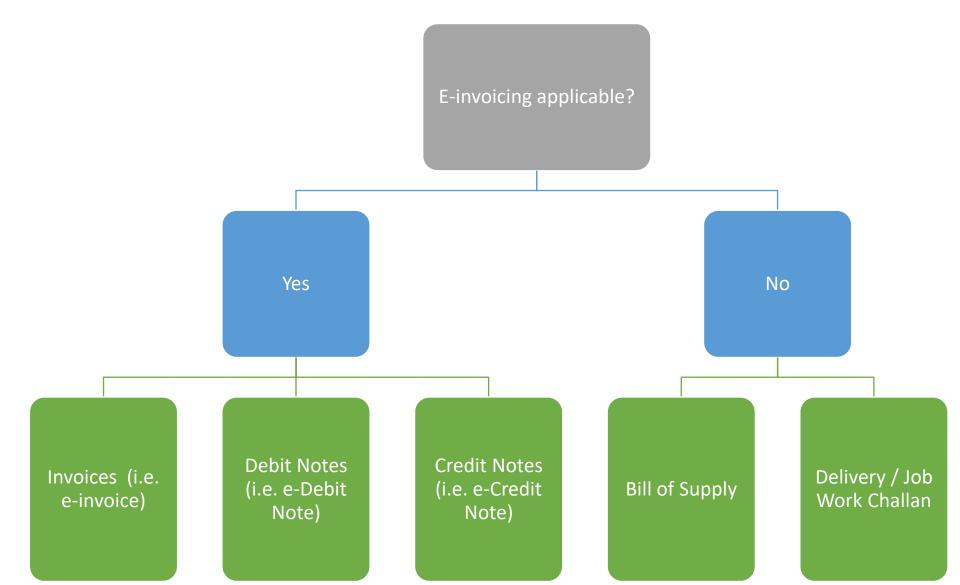
Types of documents!

What types of documents are to be reported to GST System?

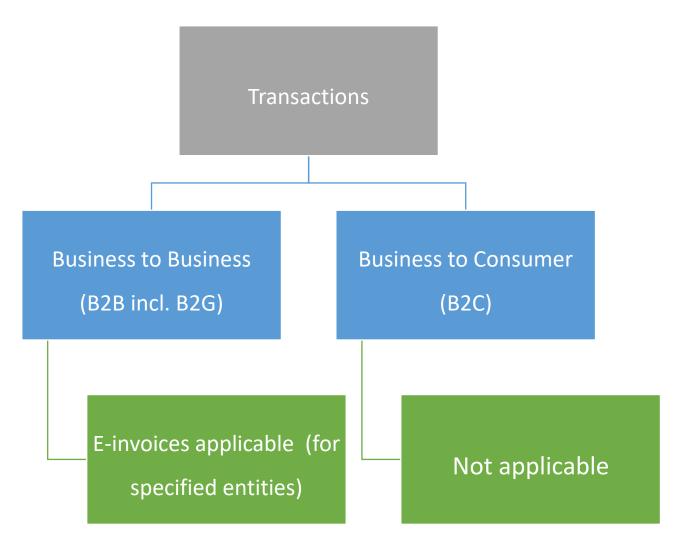
The taxpayers need to report the following documents to the e-invoice system.

- Invoice by Supplier
- Credit Note by Supplier
- Debit Note by Supplier

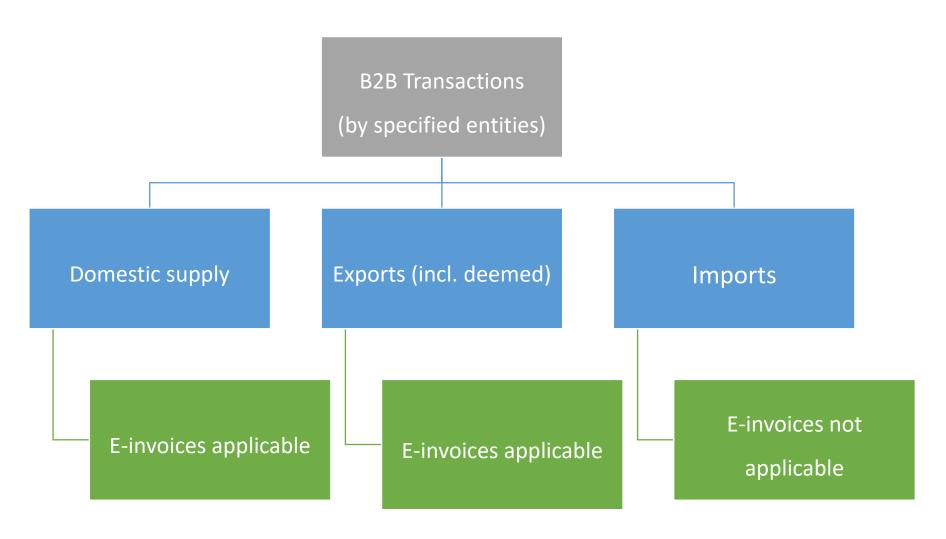
E-Invoicing – Types of Documents



E-Invoicing – Types of Transactions



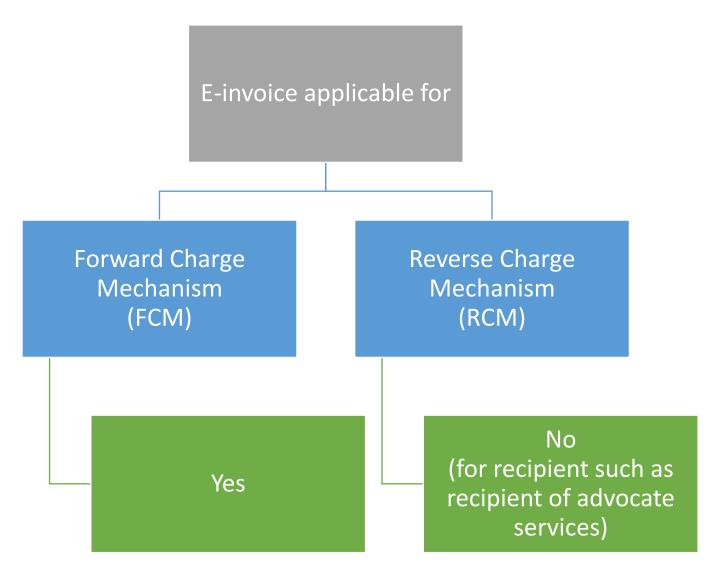
E-Invoicing – Domestic supply and Exports



Exports!

- Please clarify whether exports would require e-invoice compliance.
- Yes, the e-invoice schema also caters to the **export invoices** as well. The e-invoice schema is based on most common standard format and it meets the requirements of the export as well.

E-Invoicing – FCM and RCM



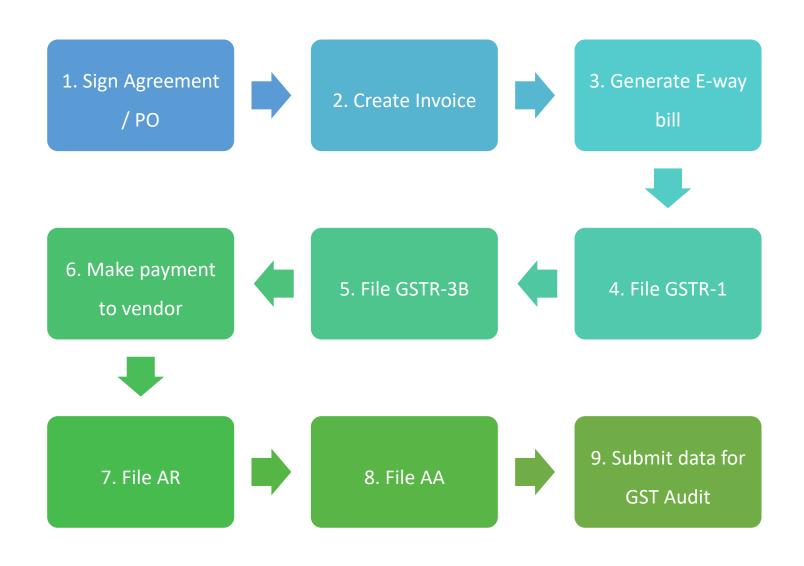
RCM!

- Will e-invoice schema cater to reverse charge mechanism?
- Yes, E-invoice system has a reverse charge mechanism reporting as well

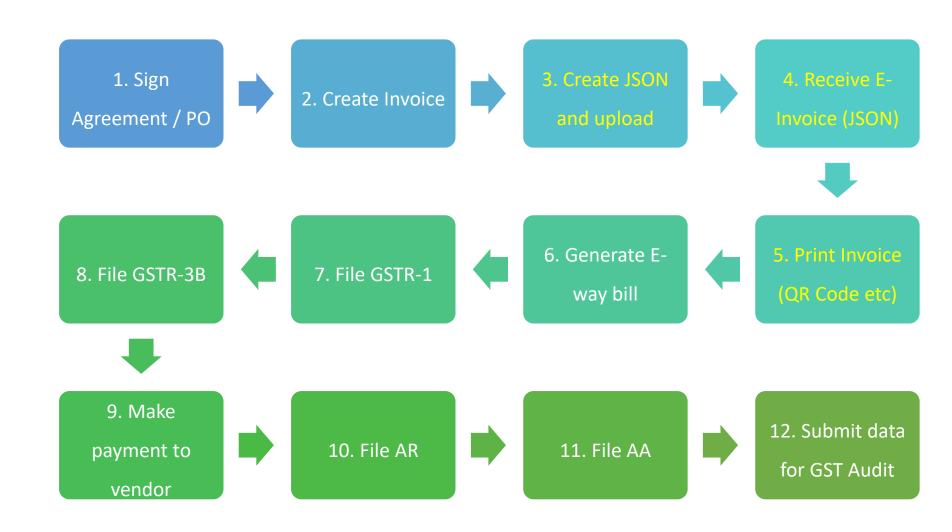
Aforesaid, is for supplier and not recipient!

E-invoicing - Process

Process - Before!



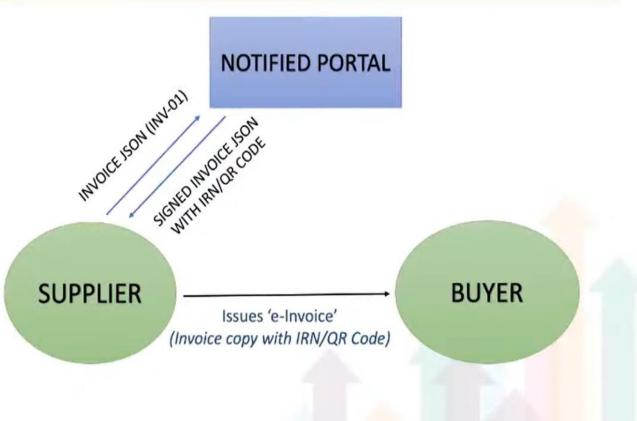
Process - After!



What will change!

Issuing invoice in e-invoicing scenario



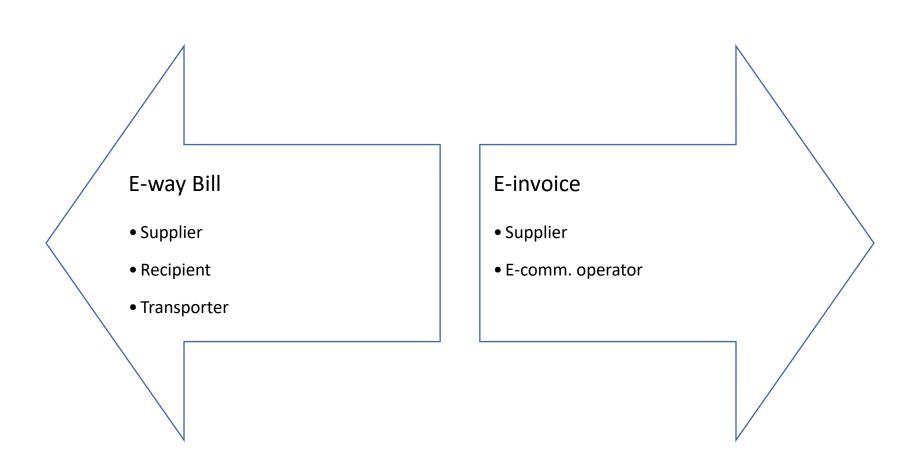


Prepare or intimate!

- <u>Will businesses now be required to generate e-invoices on the GST portal</u> or the e-invoice portal?
- No. The tax payer will first prepare and generate his invoice using his ERP/accounting system or manual system and then upload these invoice details to IRP and get the unique reference number, known as IRN. It is clarified again that the e-invoice means **NOT preparation or generation** of tax payer's invoice on government portal. It is **only intimating** the government portal that invoice has been issued to the buyer, by registering that invoice on the government portal.

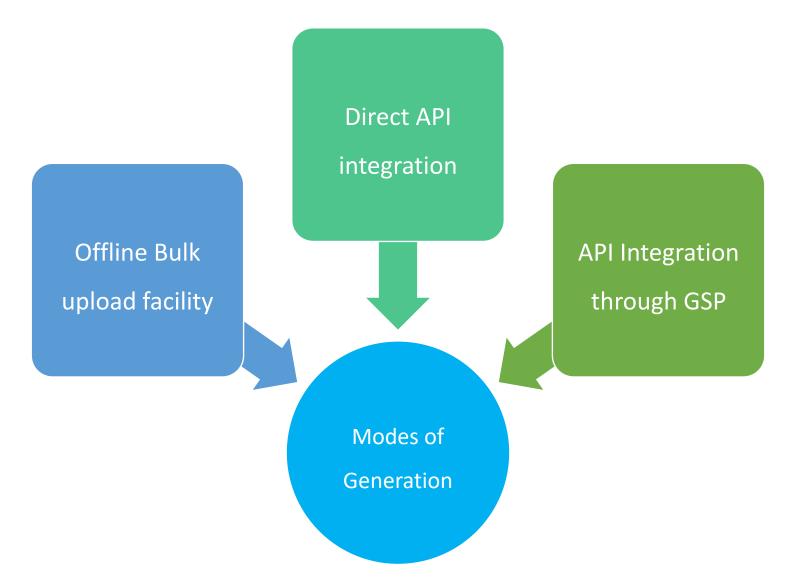
Who will generate?

Who to generate!



How to prepare E-invoicing?

Modes of generation!



E-invoicing —

Step Plan for Suppliers!

Step Plan for Suppliers! [Using Bulk IRN Generation Tool]

- 1. Preparing the data sheet (refer Bulk IRN Generation tool):
- Supply of goods B2B [Intra-State or Inter-State], Supply to SEZ (with or without payment), deemed export, export (with or without payment), etc
- Supply of services B2B [Intra-State or Inter-State], Supply to SEZ (with or without payment), deemed export, export (with or without payment), etc

2. Ideally, aforesaid data/details should be available in ERP/accounting system. Thus, after retrieving data, these details should be added in Bulk IRN generation tool (this is applicable if API integration is not done!)

Step Plan for Suppliers! [Using Bulk IRN Generation Tool]

3. Login into the e-invoice portal

(https://einvoice1.gst.gov.in/). Login to e-invoicing portal

can be done with e-way bill credentials.

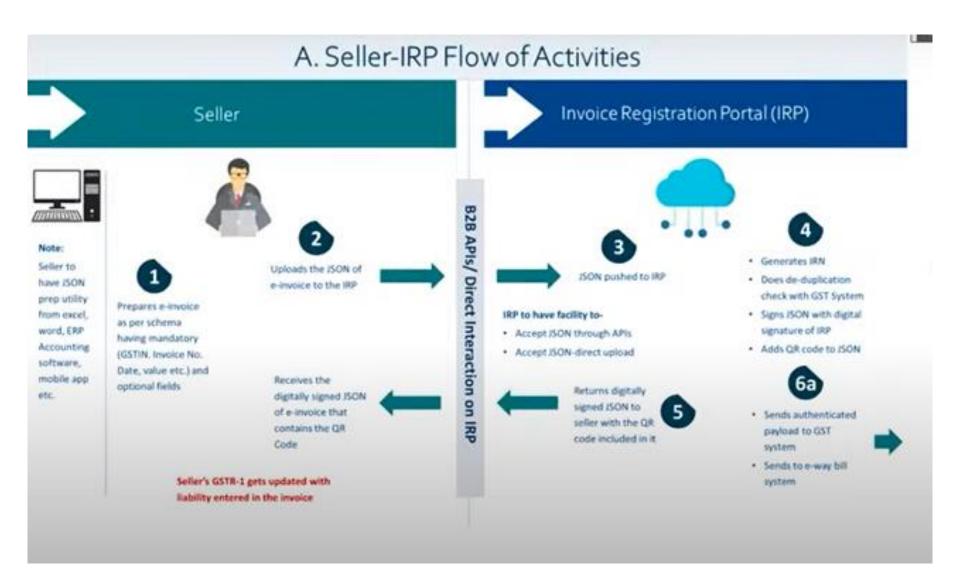
4. Upload the JSON file. After this, JSON with QR/IRN will be received from the e-invoice portal.

Step Plan for Suppliers! [Using Bulk IRN Generation Tool]

5. Subsequently, after adding QR code, the tax invoice can shared with customers. Before adding the QR code in the invoice, QR code should be converted into a picture. If required, IRN or Ack. no. can also be added in the invoice.

6. Then the final sample invoice and layout would be reviewed (one each for all sample transaction types). After taking print, QR code should be legible and QR code should be on the first page of invoice.

Process –Seller IRP Flow of Activities



IRN and QR code

IRN and QR Code

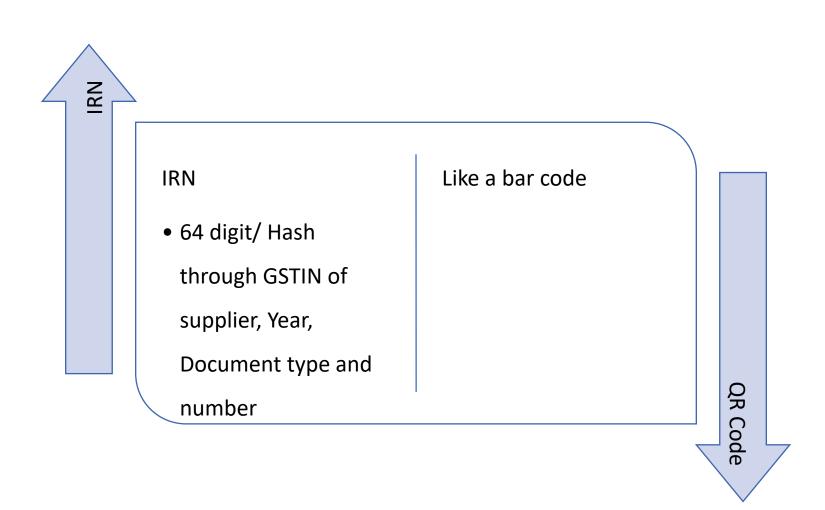
After uploading JSON, validation by IRP various parameters like

GSTIN of Supplier and Recipient

Invoice Number (Duplication Check)

After validation, IRN and QR Code generated

IRN and QR Code



IRN

IRN - Relevance!

Unique for this year for India

Not only
Government, transporter, or buyer but also banking etc

Without IRN goods or services cannot move

QR code

QR Code

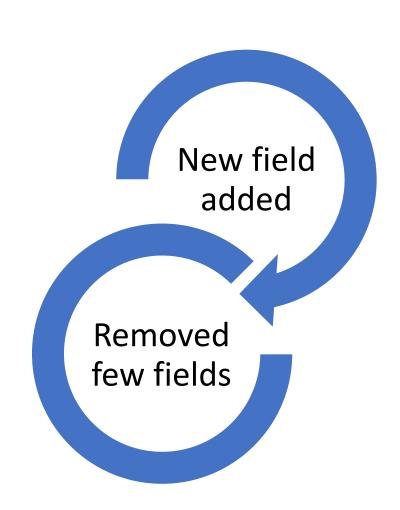
- Through QR code, following particulars will be available:
 - 1. GSTIN of supplier
 - 2. GSTIN of Recipient
 - 3. Invoice number as given by Supplier
 - 4. Date of generation of invoice
 - 5. Invoice value (taxable value and gross tax)
 - 6. Number of line items.
 - 7. HSN Code of main item (the line item having highest taxable value)
 - 8. Unique Invoice Reference Number (hash)

24 hrs!

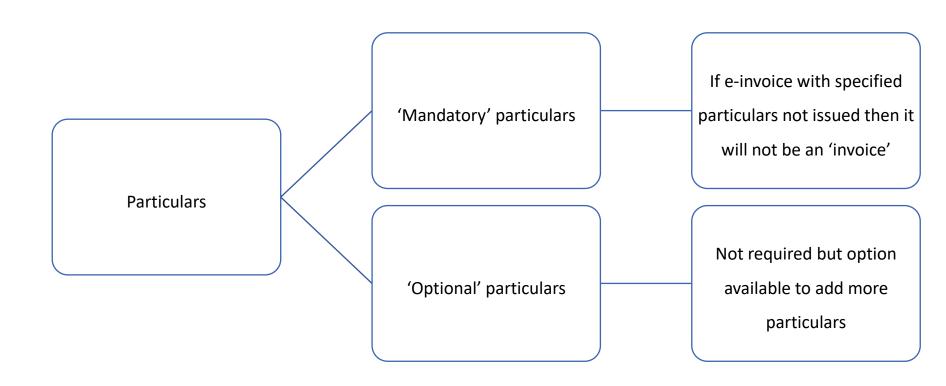
- How long will the generated e-invoice be available in the government portal?
- Once the e-invoice system has validated and registered an IRN, it will be made available to the taxpayer for reference on e-invoice system for only 24 hours.

Invoice contents

Schema of E-Invoice [Not. No 60/2020- CT)



E-Invoice Schema contents!



INV-01



New/ revised fileds!

Revised INV -01 revised Schema

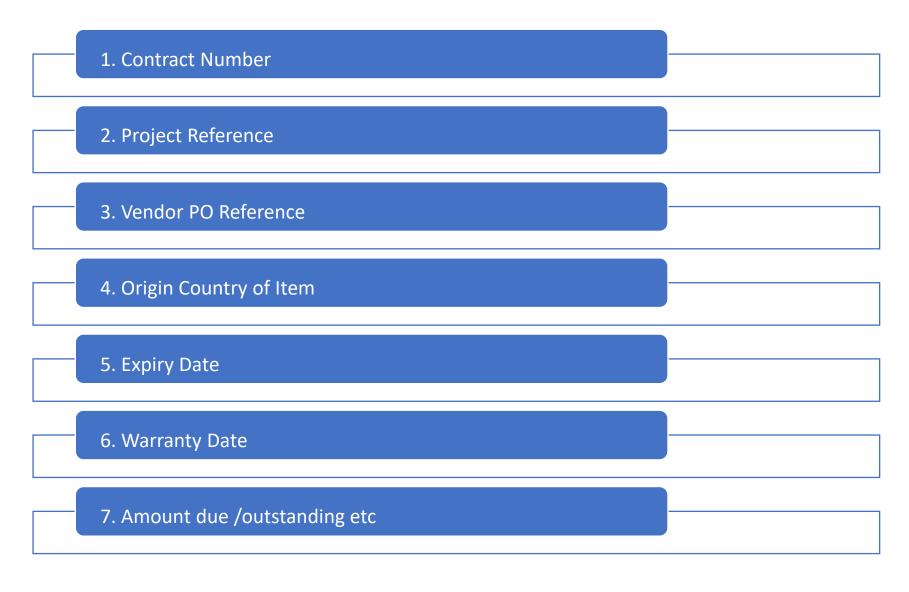
New fields added

- 'Discount' earlier at item level and now at invoice level also
- 'Other charges' earlier at item level and now at invoice level also
- 'Export duty' in extra information
- From State names to State codes
- Country **codes** to be published by Customs

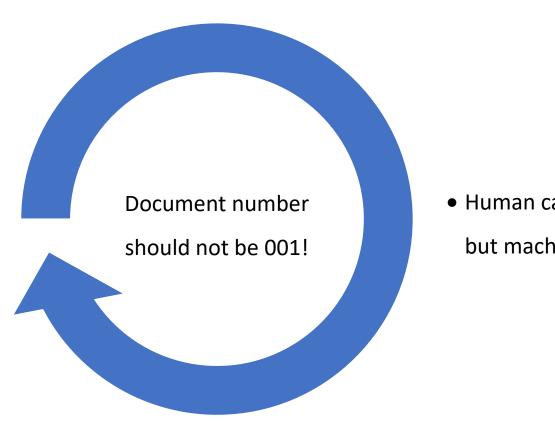
Few Key Invoice Contents – 'Mandatory'



Few Invoice Contents – 'Optional'



Invoice Contents – Formats



Human can understand but machines cannot!

One schema, to serve them all!

- Will there be separate invoice formats required for Traders, Medical Shops,
 Professionals and Contractors?
- There will not be any separate invoice formats required for Traders, Medical Shops, Professionals and Contractors. Same e-invoice schema will be used by all kinds of businesses. The schema has mandatory and non-mandatory fields.

 Mandatory field has to be filled by all taxpayers. Non-mandatory field is for the business to choose. It covers all most all business needs and specific sectors of business may choose to use that non-mandatory field which are needed by them or their eco-system.

Transporter details!

- Will it be possible to add transporter details as well?
- No, the transporter details must be entered in the **E-Way bill** system only.

E-Invoice to have IRN!

- Would the Supplier be allowed to issue his own invoice and if yes, will the Invoice number and IRN be required to be mentioned?
- Yes, the supplier will issue his own system's invoice, in the standard einvoice schema that has been published. IRN will be generated and returned by the IRP as per the process described in the concept and flow.
- Invoice will be valid only if it has IRN.

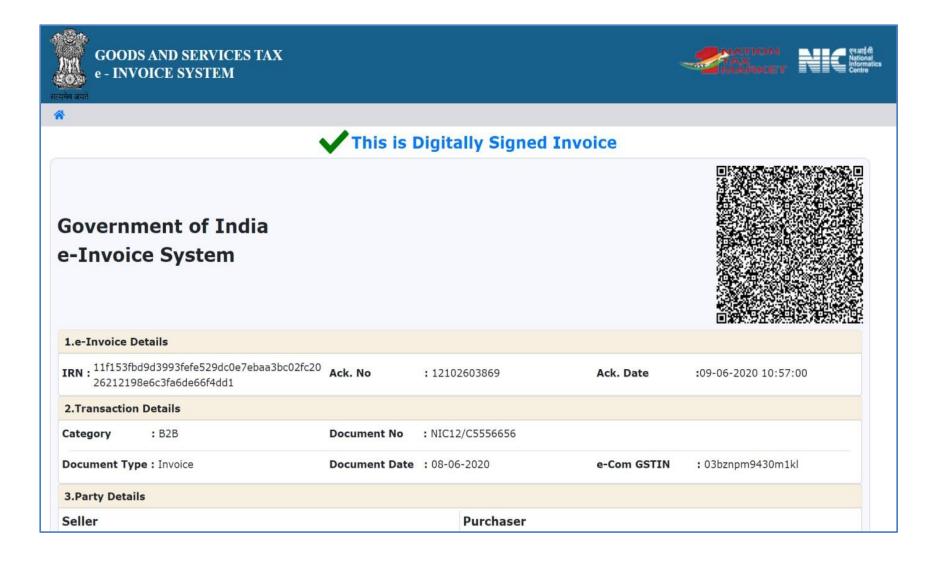
Printing e-invoice!

- Will it be possible to print the e-invoice?
- · Yes.
- It will be possible for **both** the seller as well as the buyer to print the invoice, **using the signed JSON payload** returned by the Invoice Registration Portal (IRP).
- The **QR code** will not be an image sent by the IRP but string, which the accounting/billing software or the ERP will read and **convert** into QR Code.
- Seller must place the QR Code on the print of the invoice. This will enable its validation.

How to print e-invoice!

- How to Print an E-Invoice?
- Here are the steps to follow:
 - Step 1: Login on the e-invoice portal using the username password and entering the captcha code.
 - Step 2: Select 'Print' under 'E-Invoice' appearing on the left-hand side of the dashboard.
 - Step 3: Enter the ACK No. or 64 character length invoice reference number and click 'Go'

Digitally Signed Invoice



Invoice copies

Invoice copies

Normal invoice copies

Goods [Rule 48 (1)]

- Original for recipient
- Duplicate for transporter
- Triplicate For Supplier

Services [Rule 48 (2)]

- Original for recipient
- Triplicate For Supplier

E-invoice

Rule 48 (1) and (2) not applicable to e-invoice [refer Rule 48 (6)]

Documents to be carried!

Rule 138A. Documents and devices to be carried by a person-in-charge of a conveyance

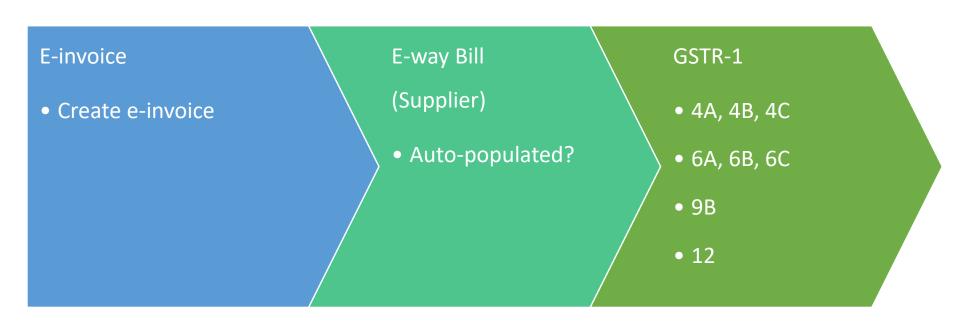
- (1) The person in charge of a conveyance shall carry—
 - (a) the invoice or bill of supply or delivery challan, as the case may be; and
 - (b) a copy of the e-way bill in physical form or the e-way bill number in electronic form or mapped to a Radio Frequency Identification Device embedded on to the conveyance in such manner as may be notified by the Commissioner

•••

(2) In case, <u>invoice</u> is issued in the manner prescribed under sub-rule (4) of rule 48, the Quick Reference (QR) code having an embedded Invoice Reference Number (IRN) in it, may be produced <u>electronically</u>, for verification by the proper officer <u>in lieu of the physical copy</u> of such tax invoice [Not. No. 72/2020]

What happens after e-invoice is generated?

E-invoices – What happens afterwards?



GSTR 1 – Auto-population!

| Table | Description |
|-------|--|
| 4 | Taxable outward supplies made to registered persons (including UIN-holders)other |
| | than supplies covered by Table 6 |
| | |
| 4A | Supplies other than those |
| | (i) attracting reverse charge and |
| | (ii) supplies made through e-commerce operator |
| 4B | Supplies attracting tax on reverse charge basis |
| 4C | Supplies made through e-commerce operator attracting TCS (operator wise, rate |
| | wise) |

GSTR 1 – Auto-population!

| Table | Description |
|-------|---|
| 6 | Zero rated supplies and Deemed Exports |
| 6A | Exports |
| 6B | Supplies made to SEZ unit or SEZ Developer |
| 6C | Deemed exports |
| 9 | Amendments to taxable outward supply details furnished in returns for earlier tax |
| | periods in Table 4, 5 and 6 [including debit notes, credit notes, refund vouchers |
| | issued during current period and amendments thereof] |
| | Debit Notes/Credit Notes/Refund voucher (Registered) |
| 9B | |
| 12 | HSN-wise summary of outward supplies |

Cancellation of E-invoice

No deletion / modification but cancellation!

Can IRN be deleted or cancelled?

The IRN once generated cannot be
modified or deleted. However, if IRN is
generated with wrong information, it
can be cancelled. Once it is cancelled,
the IRN cannot be generated on the
same invoice. The cancellation is
required to be done within twenty-four
hours from the time of generation.

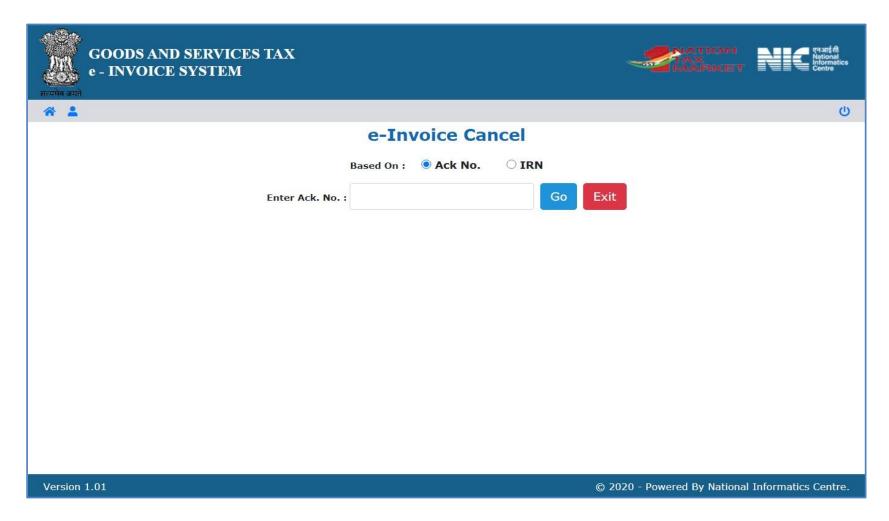
If there is a mistake or wrong entry in generated IRN, what has to be done?

• If there is a mistake, incorrect or wrong entry in the already generated IRN, then it cannot be edited or corrected. Only option is cancellation of e-invoice and generation of a new one with the new invoice. Once it is cancelled, the IRN cannot be generated on the same invoice.

Clarification on e-invoice!

- There is a facility to the user to cancel the IRN, if active e-way bill is not there. That is, the eway bill is **not generated** or the e-way bill **generated** and later cancelled, then the user is allowed to cancel the IRN.
 - https://einvoice1.gst.gov.in/Documents/elnvoice process.pdf

Cancellation!



•

Cancellation!

If e-way bill not there

If e-way bill is there

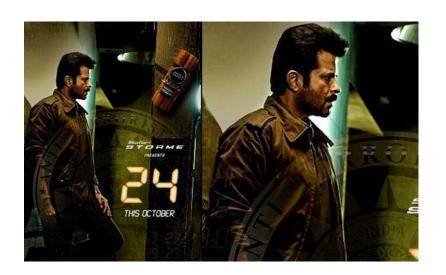
Then can be cancelled within 24 hours

Then cannot be cancelled

Will be deleted from GSTR-1

-

Once cancelled then IRN cannot be generated on same invoice number

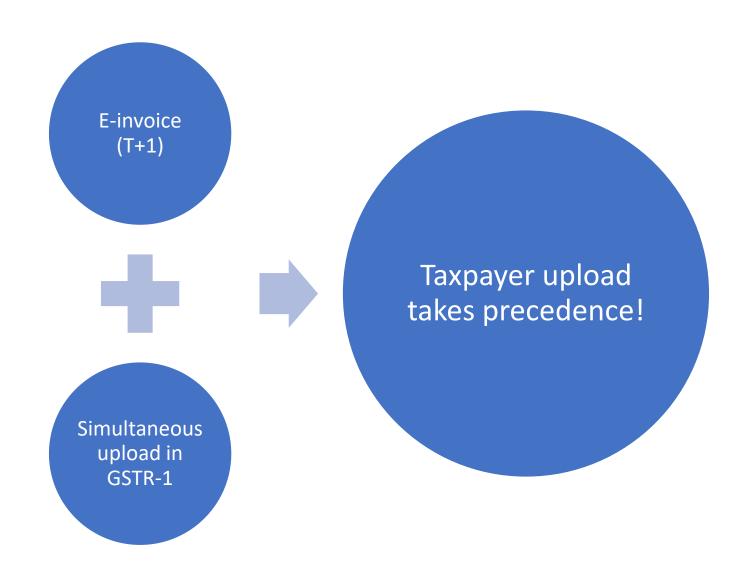


E-invoice - Corrections?

After generation of E-invoice:

- Subsequent changes can be done in GSTR-1!
- Audit trail will be available for Authorities

What if!



FAQ

Digitally signed E-invoice

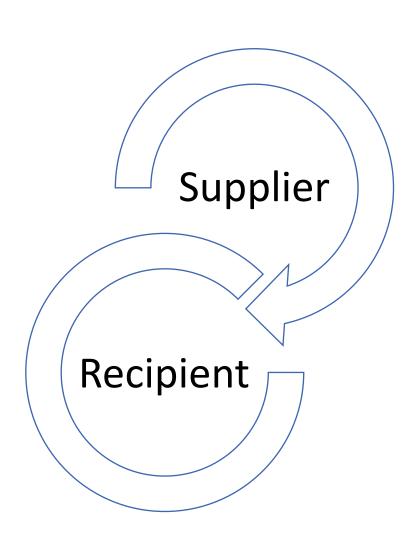
- What is the meaning of Digitally signed E-Invoice?
 - The digitally signed invoice is one which has been digitally or electronically signed by the IRP after receiving the invoice upload from the supplier. That is, the government is authenticating the genuineness of the invoice submitted/registered by the tax payer.

Export E-invoices

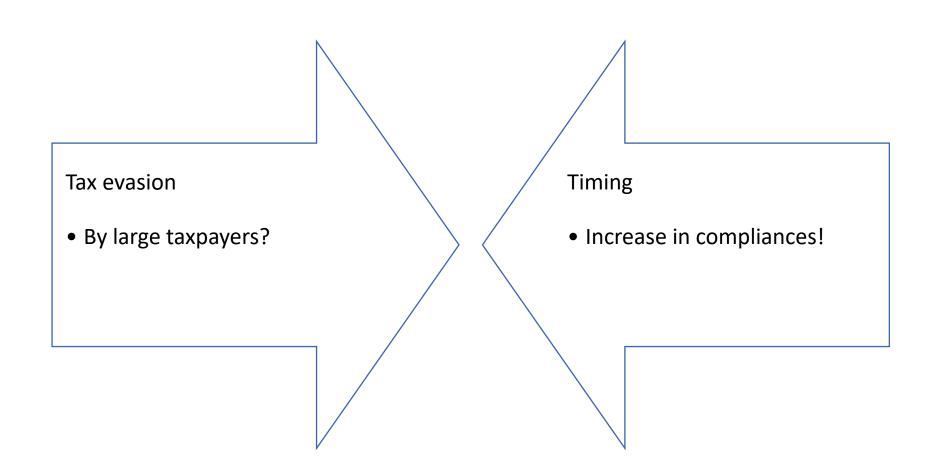
- Does the e-Invoice allow the declaration of export invoices/ zero rated supplies (Goods on what GST is not Applicable or Free from Tax)
 - Yes, it allows the declaration of export invoices / zero rated supplies.

E-invoicing – Challenges for Suppliers!

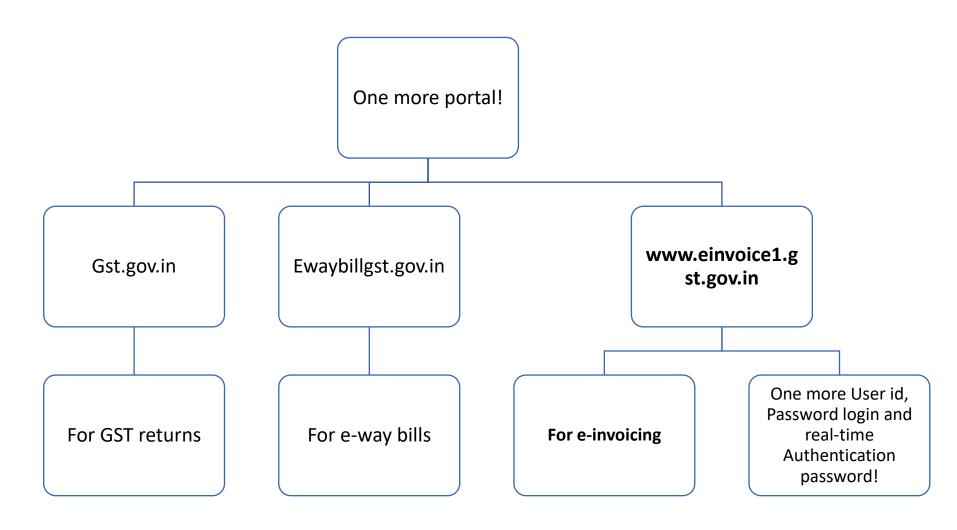
Challenges – Recipient



E-invoicing — For?



Challenges – One more portal!



Challenges – One more compliance!

Login and check whether valid e-invoice generated

Login and check whether details auto populated in e-way bill

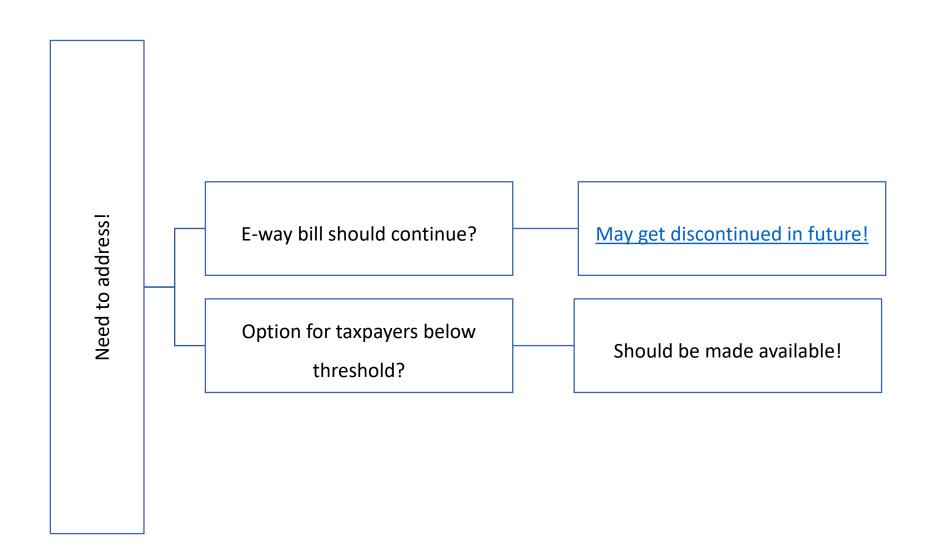
Login and check whether details auto populated in GSTR-

1

Call/ email and check whether details auto-populated in

GSTR -2A of buyer

Challenges – Others!

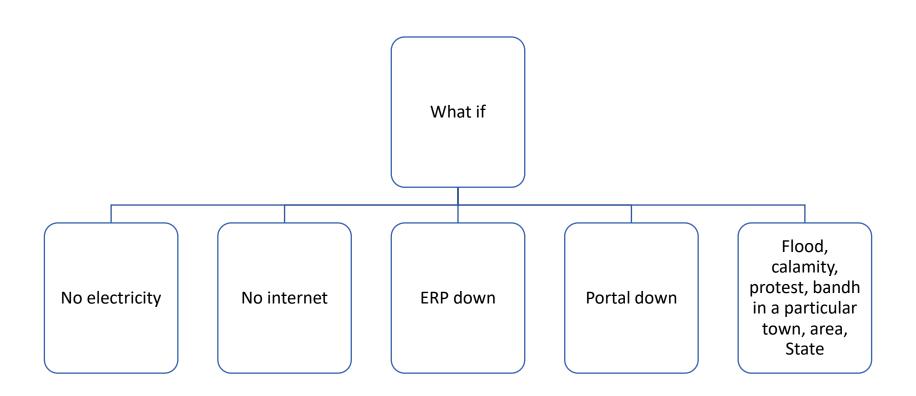


Challenges – Re-conciliations!

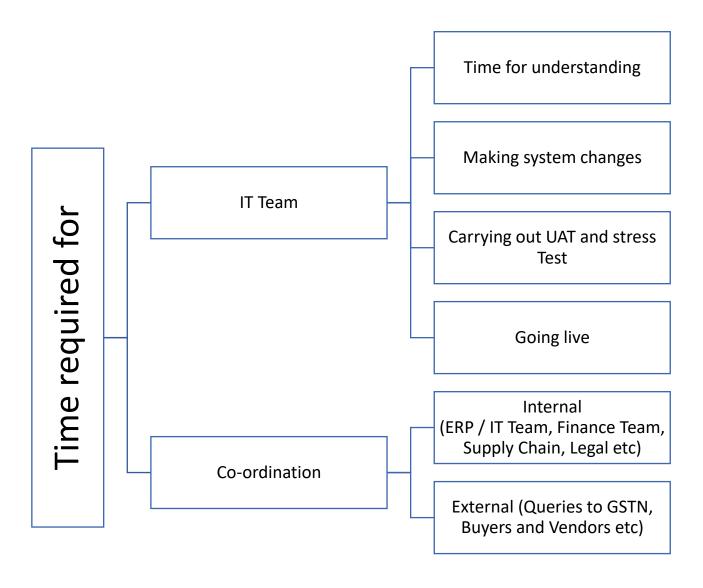
Few more re-conciliations!

- E-invoices (B2B) and normal invoices (B2C) vis-à-vis GSTR-1
- E-invoices and normal invoices received vis-à-vis GSTR 2A
- E-invoices vis-à-vis IRN generated
- E-invoices vis-à-vis E-way Bill

Challenges – What if?



Challenges – Paucity of time!



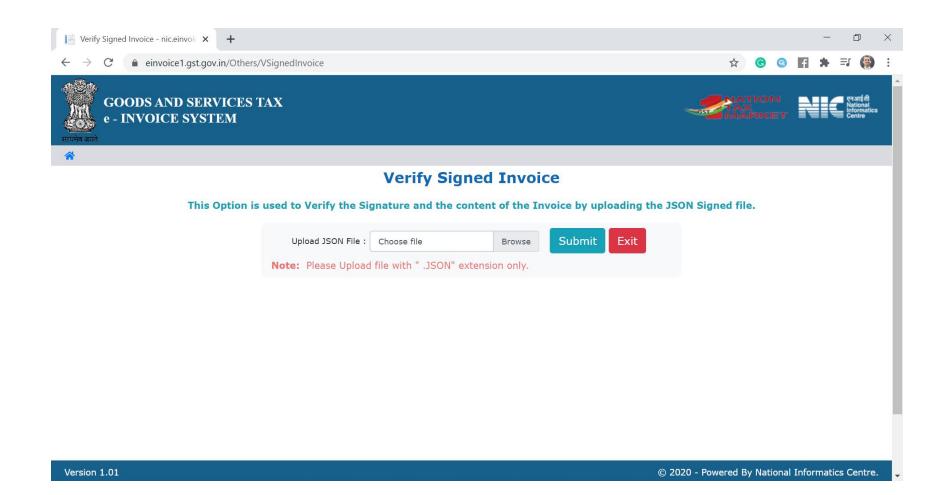
E-invoicing – Challenges to Recipient

How to verify e-invoice!

How to verify e-invoice!

- How can anyone verify the authenticity or the correctness of e-invoice?
- Anyone can verify the authenticity or the correctness of e-invoice by uploading the signed JSON file or Signed QR Code into e-invoice system. The option 'Verify Signed Invoice' under Search option can be selected and the signed JSON file can be uploaded and verified. Similarly, the QR Code Verify app may be downloaded and used to verify the QR Code printed on the Invoice.

Verify!



Challenges – Expenses

Particulars

- Tax Invoice / BoS
- QR Code, if applicable
- E-way bill, if applicable

Goods

- Yes
- Yes
- Yes

Service

- Yes
- Yes
- NA

E-invoicing —

Step Plan for Recipient!

Step Plan for Recipients!

1. Initiate **discussion** with the vendor about applicability of E-Invoice and/or turnover confirmation!

2. Appropriate clause to be included in the Agreement and/or PO to cover the risk of ITC on account of Non-compliance by vendor!

Step Plan for Recipients!

3. From 1st October 2020 to 31st October 2020 – From the vendors to whom e-invoicing is applicable, receive IRN (either on real-time basis or within 30 days from date of invoice) for Tax invoices, Credit Notes, Debit Notes issued after 1st October 2020!

4. From 1st November 2020 – From the vendors to whom e-invoicing is applicable, receive IRN on real-time basis!

Step Plan for Recipients!

5. Expenses with e-invoice and without e-invoice could be accounted **separately** to trace valid Tax Invoice. Also, try to add IRN No./ Ack. No. in the data / master field for ease in tracking e-invoices.

> 6. Track Phase-wise implementation of einvoicing and take steps as e-invoicing becomes applicable for above 100 crore from 1.01.2021!

Way Forward

Way Forward

Start early!

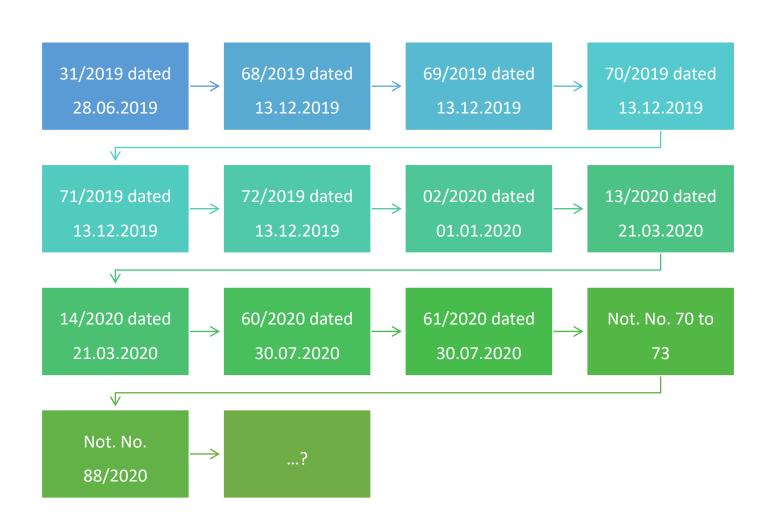
For e-invoicing implementation, work closely with:

- IT /ERP Team
- Finance Team
- Procurement Team
- Sales Team, Logistics Team etc

E-invoicing

Official Documents and Details

Notification – Chronology!



Official documents/ links on E-invoicing

| No. | Notification | Remark | Amended later by |
|-----|--------------|------------------------------|----------------------------------|
| 1. | 31/2019-CT | Enabling power for QR code | <u>60/2020-CT</u> |
| | | on invoice | |
| 2. | 68/2019-CT | Sub-rule (4), (5) and (6) | _ |
| | | introduced in Rule 48 | |
| 3. | 69/2019-CT | http://www.einvoice1.gst.go | _ |
| | | v.in/ portals notified | |
| 4. | 70/2019-CT | E-invoice date for INR 100 | <u>13/2020-CT</u> and 88/2020-CT |
| | | crore notified as 01.04.2020 | |
| 5. | 71/2019-CT | Date for QR code notified as | - |
| | | 1.04.2020 | |

Official documents/links on E-invoicing

| No. | Notification | Remark | Amended later by |
|-----|-------------------|------------------------------|---|
| 6. | 72/2019-CT | QR code for B2C from | 14/2020-CT |
| | | 1.04.2020 | |
| 7. | <u>02/2020-CT</u> | Format INV-01 introduced | 60/2020-CT |
| 8. | 13/2020-CT | Applicable for INR 100 crore | <u>61/2020-CT</u> , <u>70/2020-CT</u> and |
| | | from 1.04.2020 | 88/2020-CT |
| 9. | 14/2020-CT | Dynamic QR Code from | 71/2020-CT (from 1 st December 2020) |
| | | 1.10.2020 | |
| 10. | 60/2020-CT | INV-01 substituted | - |

Official documents/links on E-invoicing

| No. | Notification | Remark | Amended later by |
|-----|--------------|------------------------------|------------------|
| 11. | 61/2020-CT | Turnover increased to INR | - |
| | | 500 crore and SEZ excluded | |
| 12. | 72/2020-CT | Rule 46, Rule 48 and 138A | - |
| | | amended | |
| 13. | 73/2020-CT | Relaxation for the month of | - |
| | | October 2020 | |
| 14. | 88/2020-CT | E-invoicing applicable from | - |
| | | 01.01.2021 for taxpayers | |
| | | (other than SEZ unit) whose | |
| | | aggregate turnover in any of | |
| | | FY from 17-18 exceeds INR | |
| | | 100 Crores | |

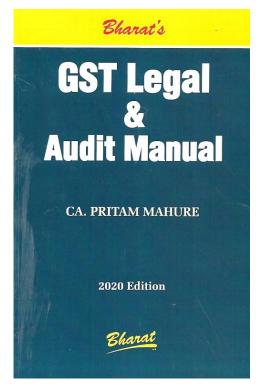
Official documents/ links on E-invoicing

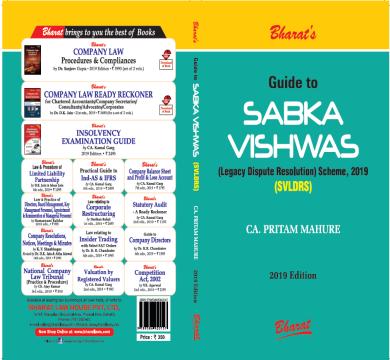
| No. | Link to Other Documents | | |
|-----|---|--|--|
| 1. | Webinar on E-invoicing with ZOHO (in English) | | |
| 2. | Webinar on E-invoicing with ZOHO (in Marathi) | | |
| 3. | Rule 48 of CGST Rules | | |
| 4. | Format of INV-01 | | |
| 5. | <u>User Manual –Web System</u> | | |
| 6. | User Manual –Bulk Uploading | | |
| 7. | Computer Based Training | | |
| 8. | FAQ | | |
| 9. | FAQ on QR Code | | |
| 10. | E-Invoice System | | |
| 11. | Webinar on e-invoice by GSTN -20 September 2020 | | |

Feedback!

- Say line items is more than 1,000
 - <u>Support.einv.api@gov.in</u>

Our Books





Bharat's

GST on

REAL ESTATE

Law & Procedure

With amendments as applicable from 1st April, 2019

[including Not. No. 11/2017-CT(R), as amended by

Not. No. 3/2019-CT(R), w.e.f. 1-4-2019]

CA. PRITAM MAHURE

2019 Edition

Thank you!

CA Pritam Mahure and Associates

Happy to Discuss

For suggestions: <u>info@lawgical.in</u> / +91 9920644648 / 020-27293425

E-books on GST

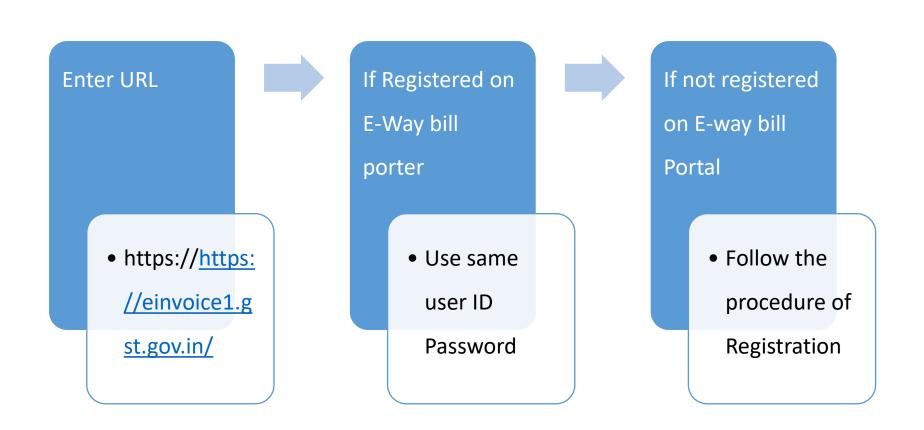
E-books on How to be Future Proof

Smile please ©

Annexures

Registration to E-Invoice System

Registration for e-invoice system



Registration for e-invoice system



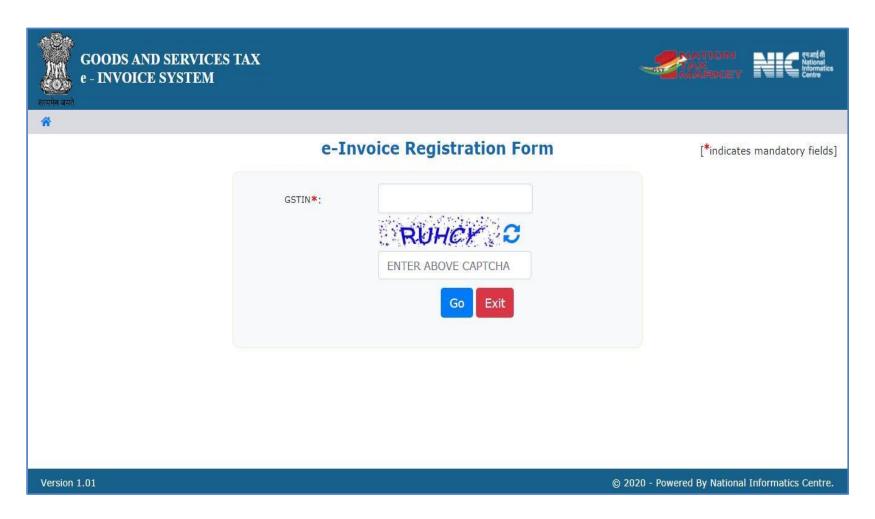
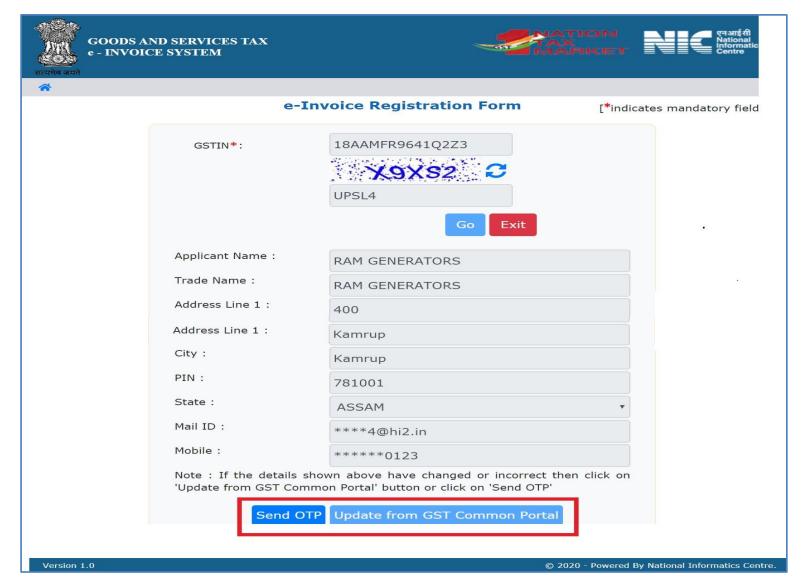


Figure 2: -in Registration form 1.

vo ic







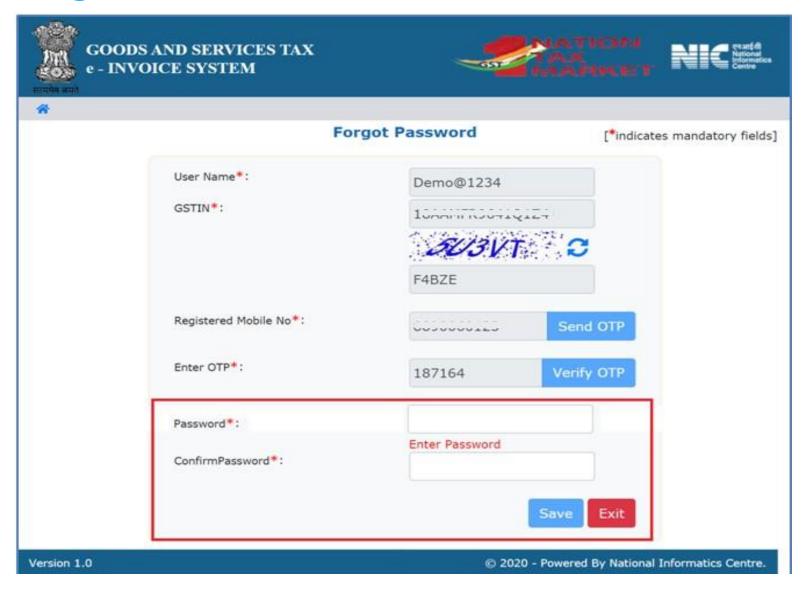


1

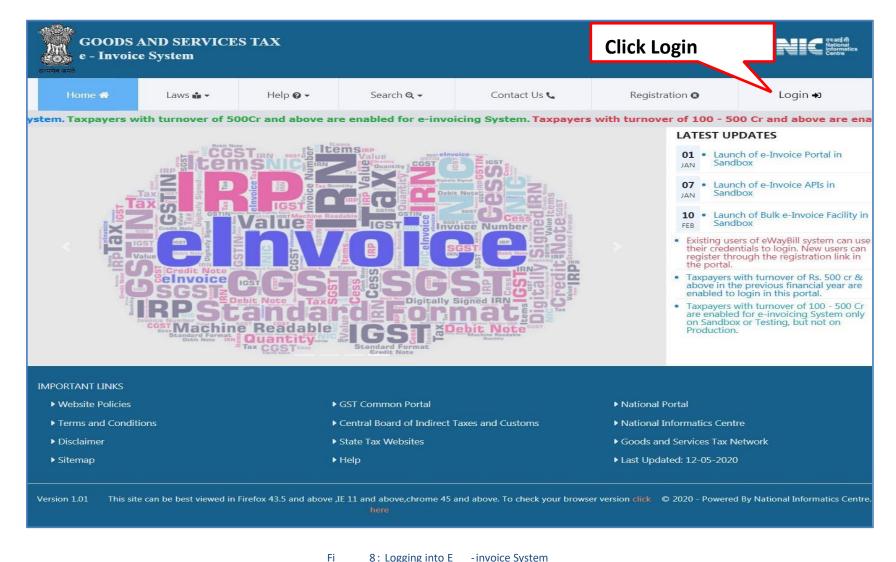
e-Invoice Registration Form

[*indicates mandatory fields]

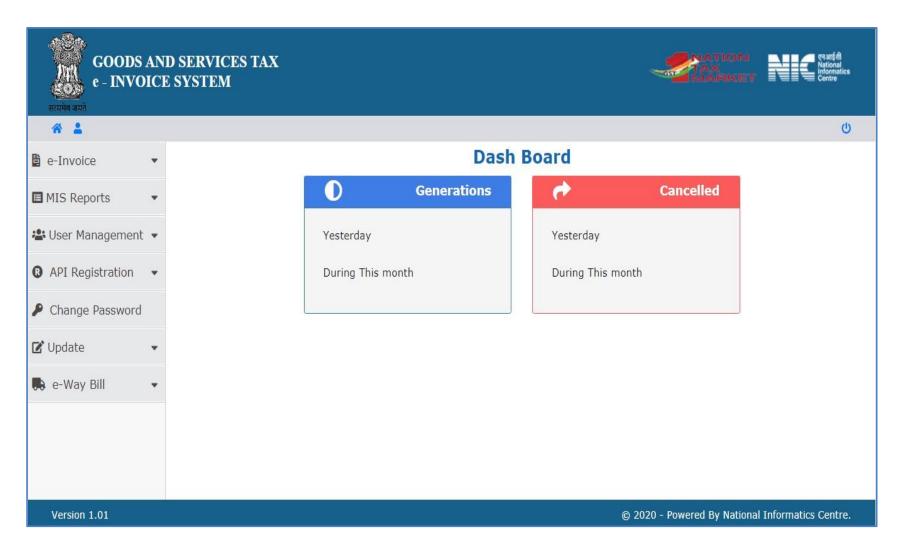
| GSTIN * ∶ | 18AAMFR9641Q2Z3 |
|------------------|---|
| | 4XBPD € |
| | E2Z5N |
| | Go Exit |
| Applicant Name : | RAM GENERATORS |
| Trade Name : | RAM GENERATORS |
| Address Line 1: | 400 |
| Address Line 2: | GUWAHATI |
| City: | Kamrup |
| PIN: | 781001 |
| State : | ASSAM ▼ |
| Mail ID : | ****4@hi2.in |
| Mobile : | *****0123 |
| | s shown above have changed or incorrect then n GST Common Portal' button or click on 'Send |
| Send O | TP Update from GST Common Portal |
| Enter OTP: | Verify OTP |



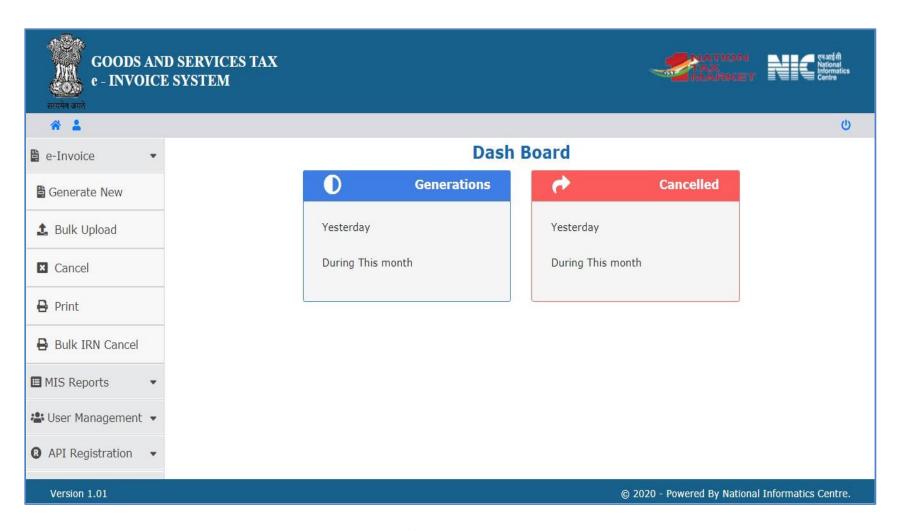
Logging into E-invoice System



Main Menu

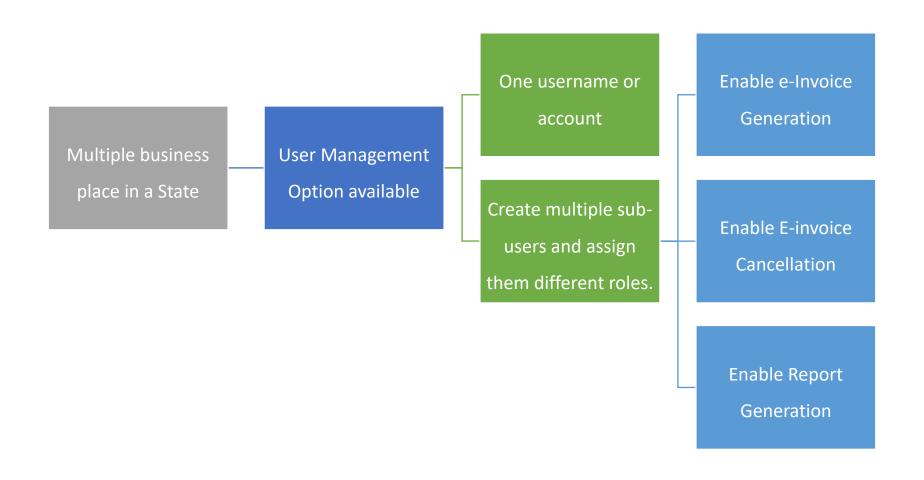


Options under E-invoice



Other Key Aspect!

How many persons can generate E-way bill!



Maximum Number of sub-users!

- How many sub user can be created?
 - For every **principal/additional place of business**, user can create **maximum of 10 sub-users**. That is, if tax payer has only (one) principal business place (and no additional place of business), he can create 10 sub-users. If tax payer has 3 additional places and one principal place of business (ie 4 places), then he can create 40 (4 X 10) sub users...

Useful features at https://einvoice1.gst.gov.in/

Taxpayer Search

• GSTIN No.

Pin code Search

Verify Signed Invoice

E-invoice status of

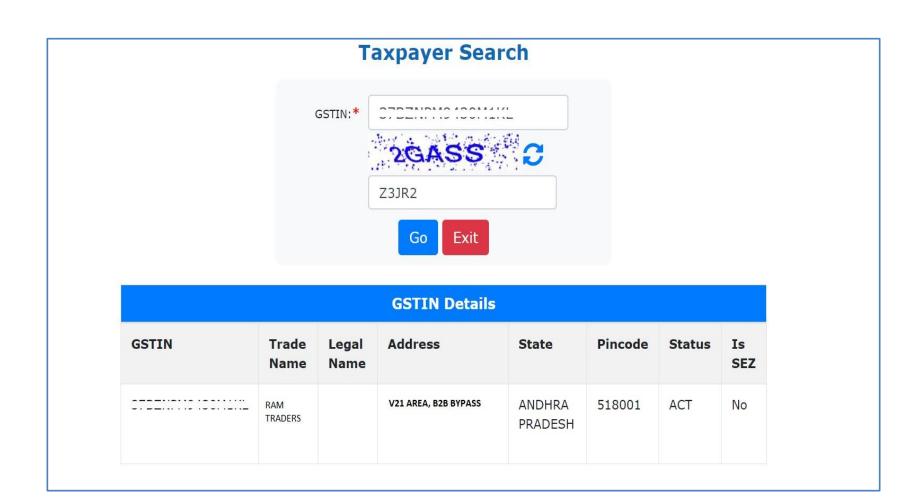
Taxpayer

Master Codes

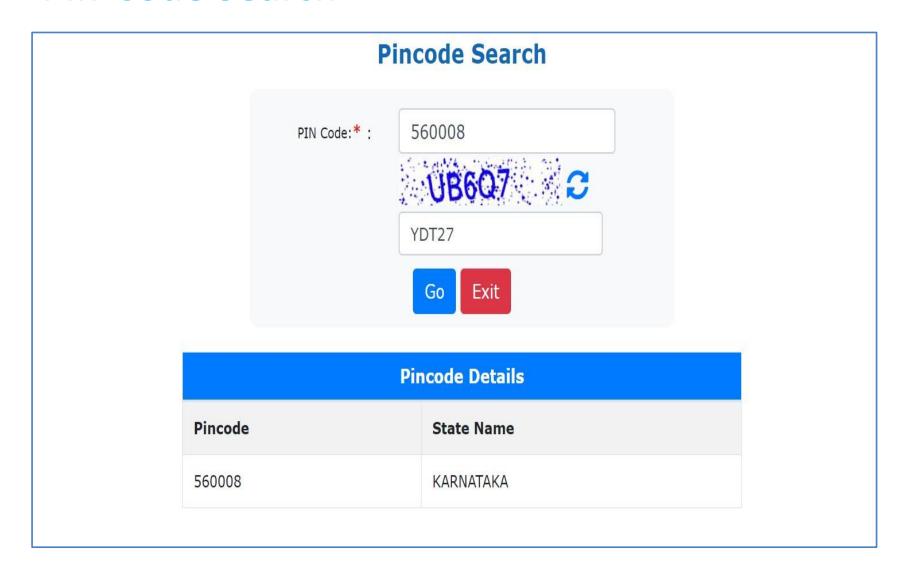
QR Code Verify App

Sandbox Testing

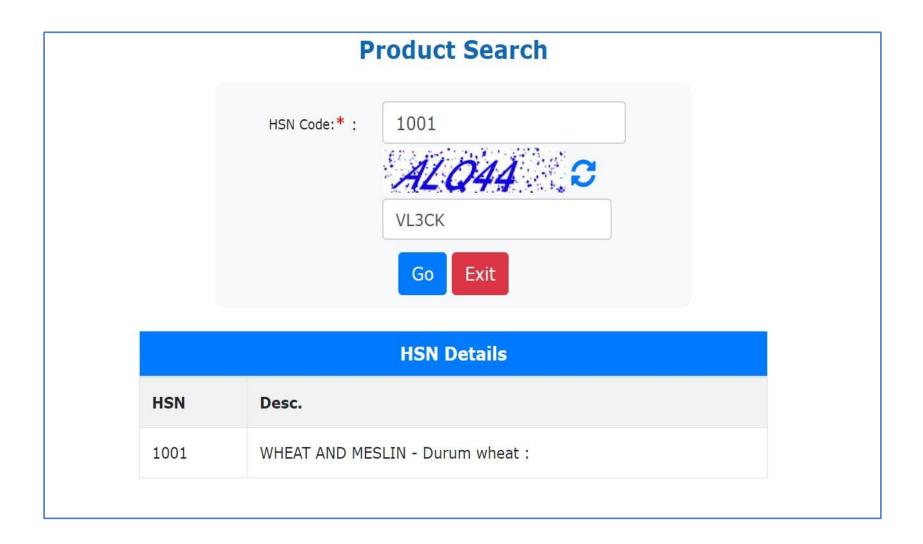
Taxpayer Search



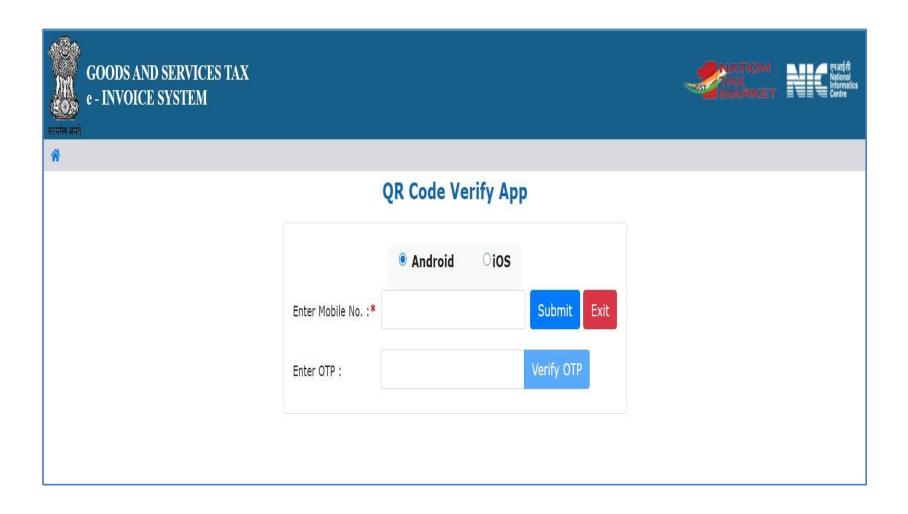
Pin-Code Search



Product Search



QR Code Verify Application



Its over (for the time being!) ©

Next rush begins on or after 1.01.2021 (i.e. once taxpayers below INR 500 crore get covered)!