

Analysis of GST Annual Return (Form GSTR-9)

THE CHARTERED ACCOUNTANTS' STUDY CIRCLE, CHENNAI

APRIL 13, 2019

Scope

- ▶ Basic provisions
- ▶ Parts of the Annual Return
 - ▶ Tables
 - ▶ Constituents
- ▶ Treatment for:
 - ▶ Transactions recorded in Jul.17 – Mar.18 GSTRs
 - ▶ Transactions recorded in Apr.18 – Sep.18 GSTRs
 - ▶ Transactions not recorded in GSTRs till date
- ▶ Points to ponder!

Annual Return – Basics

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Who should file?

All regd. persons except:

- ISD;
- Person required to deduct tax at source;
- Person required to collect tax at source;
- Casual Taxable Person;
- NR Taxable Person
- Entities holding UIN, including UN agencies / Embassies

By When?

- 30th Jun. 2019 (for 9M, FY18)
- 31st Dec. of the succeeding FY;

Form:

- All regd. persons – GSTR-9;
- Composition Dealer – GSTR-9A
- E-com operator reqd. to collect tax at source – GSTR-9B

Consequences of non-filing:

- Notice with 15 days' time to file;
- Late fee: Rs.200/day (max. 0.5% of State Turnover)

Filing of Nil GSTR-9 compulsory?

Dealer with cancelled registration?

Dealer who opted in / out of composition scheme during the FY?

GSTR-9 Format – Overview

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Part I: Basic Details

Part II: Details of outward & inward supplies *made during* the FY

Part III: Details of ITC *for* the FY

Part IV: Details of tax paid *as declared* in returns filed *during* the FY

Part V: Particulars of transactions for the previous FY *declared in returns of Apr. to Sep. of current FY* or upto date of filing of annual return of previous FY, whichever is earlier

Part VI: Other Information

Part – II: Outward & Inward supplies *made* during the FY

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Part – II comprises:

Table – 4: Advances, inward & outward supplies – *made* during the FY – on which GST is payable

Table – 5: Outward supplies – *made* during the FY – on which GST is not payable

Should be filled with:

Transactions recorded in GSTR of Jul.17 – Mar.18

Transactions (pertaining to 9M, FY18) missed to be recorded in GSTR till date

Source for filling

Outward supplies:
From GSTR-1 (or) from GL, if missed to be recorded in GSTR-1 till date

Inward supplies:
From GSTR-3B (or) from GL, if missed to be recorded in GSTR-3B till date

Table-4: Inward & outward supplies made during the FY on which GST is payable

Table 4 Constituents:

| 4A | 4B | 4C | 4D | 4E | 4F | 4G | 4I / 4J | 4K / 4L |
|----------------|--------------|--------------|-------------------|----------------|------------------------|----------------------|------------------------|-------------------------|
| B2C supplies # | B2B supplies | Exports WPAY | SEZ supplies WPAY | Deemed Exports | Unadjusted advances ** | Inward supplies –RCM | Credit / Debit Notes # | Amendments (+ / -) ** # |

Fields marked # – Refer next slide for details of aggregation

Fields marked ** – Avoid double-count!

Table-4: B2C, Cr./Dr. Notes & Amendments – Source of Information

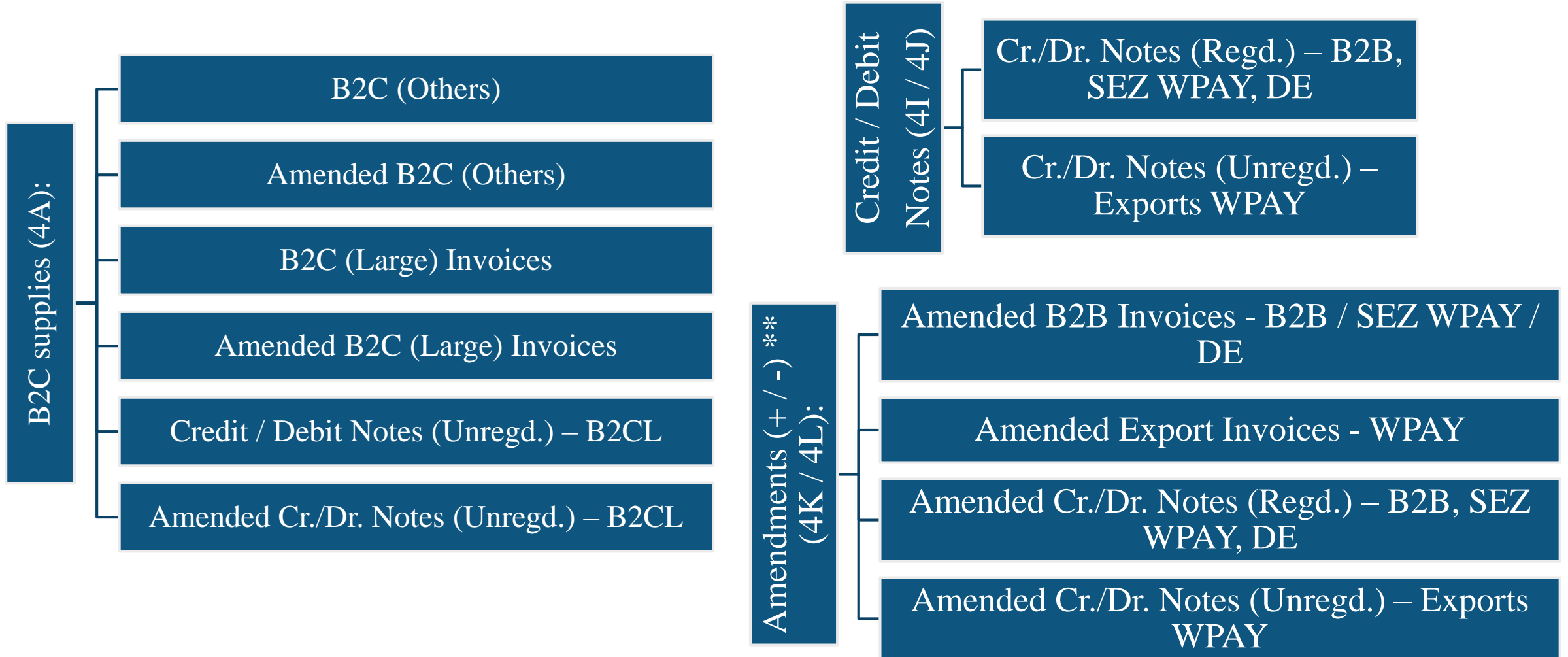
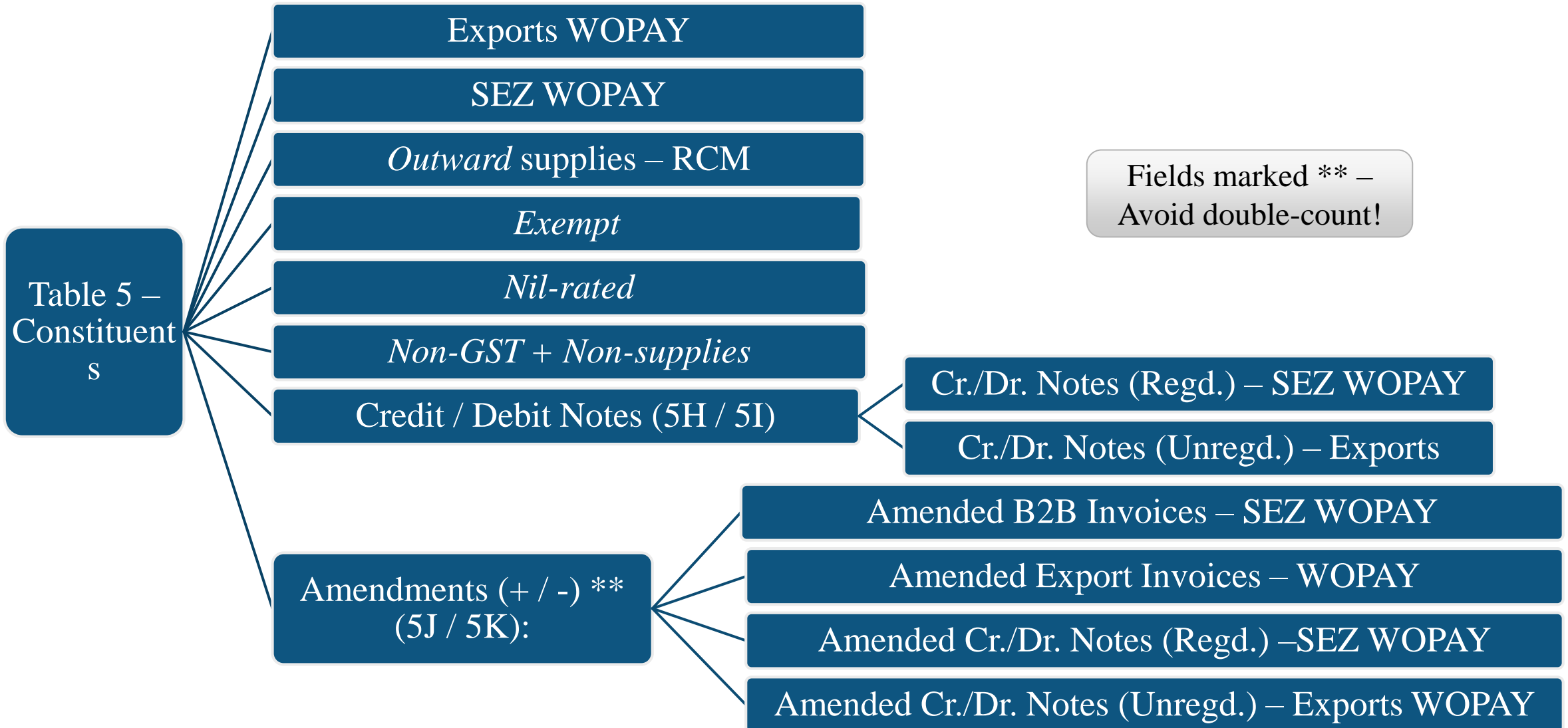


Table-5: Outward supplies made during the FY on which GST is not payable



Part – III: Details of ITC *for* the FY

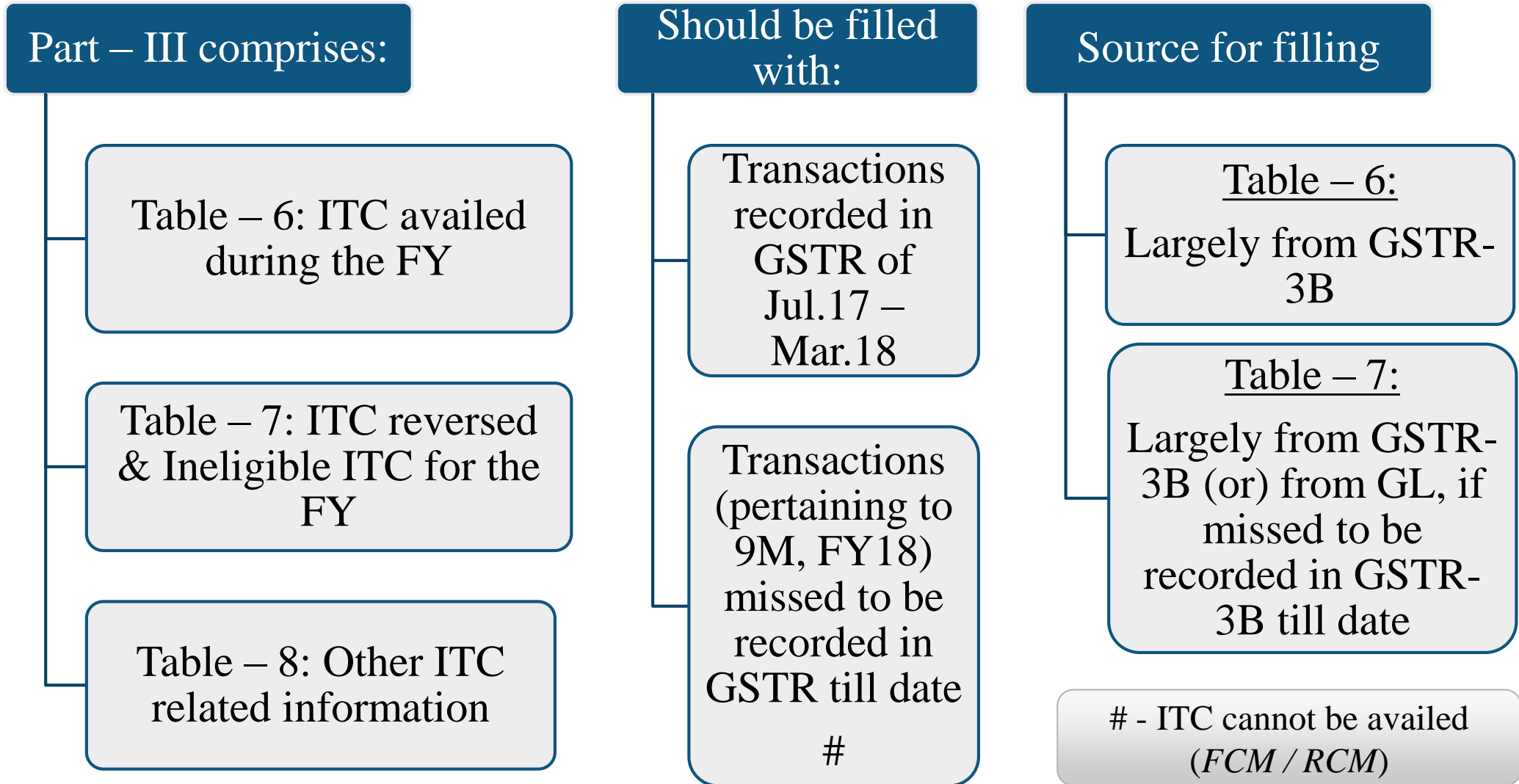


Table – 6: Reconciliation of ITC availed

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ITC availed on forward charge as per GSTR-3B



(+) ITC availed on reverse charge (dealing with unregd. persons) as per GSTR-3B



(+) ITC availed on reverse charge (dealing with regd. persons) as per GSTR-3B



(+) ITC availed on import of goods / services as per GSTR-3B



(+) ITC received from ISD / Re-claimed credit as per GSTR-3B



= Total ITC availed as per GSTR-3B



Table – 7: ITC reversal / Ineligible ITC

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Reversal as per
R.37 – Non-
payment of
consideration
within 6 months

Reversal as per
R.39 – ISD

Reversal as per
R.42 – Inputs /
Input Services

Reversal as per
R.43 – Capital
Goods

Ineligible credit –
S.17(5) *

Reversal of TRAN
credit

* This field should be entered only if the ITC availed figure is grossed up with ineligible credit in GSTR-3B.

Table – 8: Reconciliation of ITC between GSTR-2A v. 3B

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ITC as per GSTR-3B (only related to forward charge; claimed during Jul.17 – Mar.18)



(+) ITC as per GSTR-3B (only related to forward charge; related to Jul.17 – Mar.18 but claimed during *Apr.-Sep.18*)

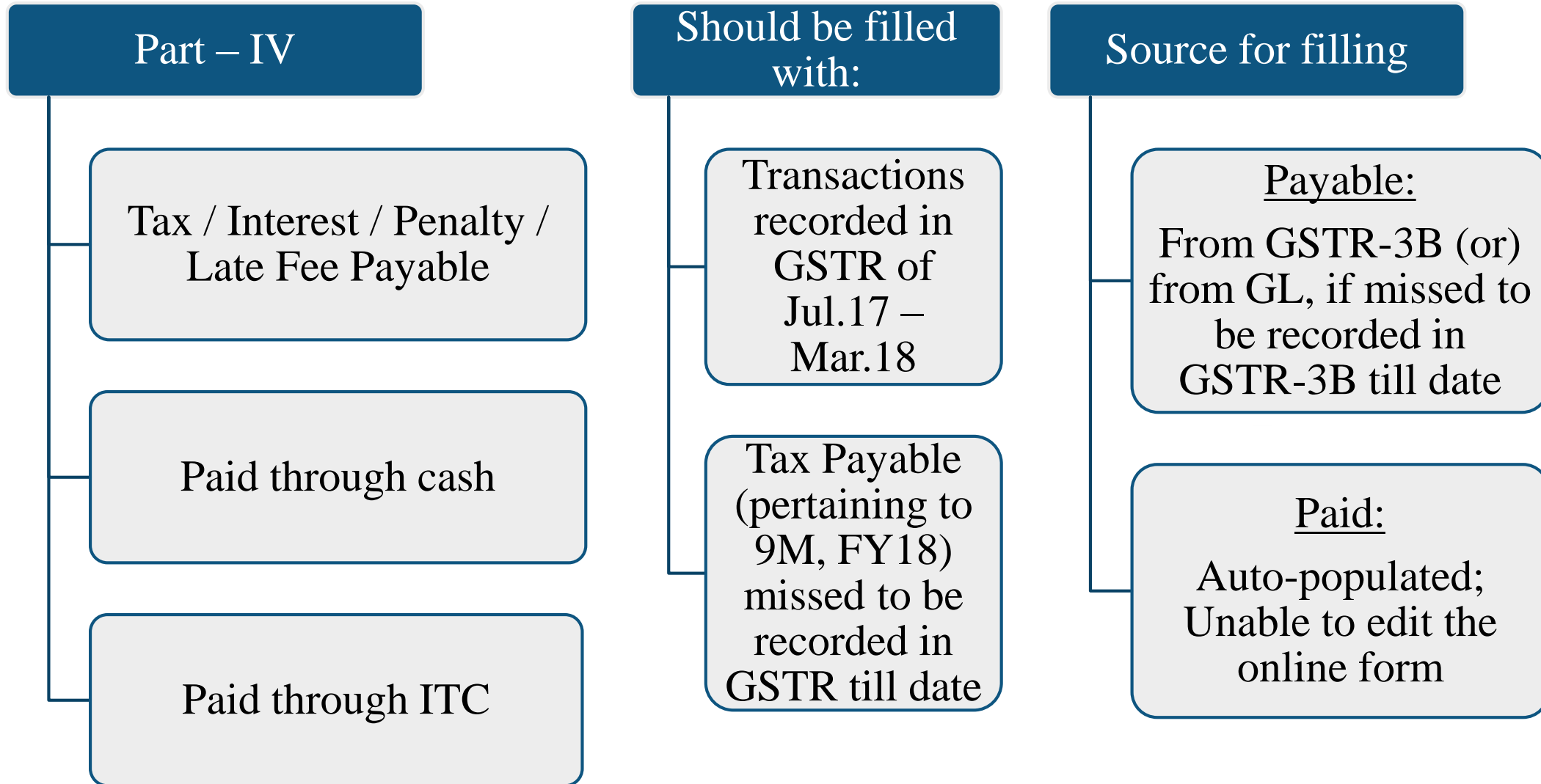


= ITC as per GSTR-2A (only related to forward charge)?

- If ITC as per GSTR-2A is higher compared to GSTR-3B, assessee should fill: (i) ITC available but not availed; (ii) ITC available but ineligible.
- If ITC as per GSTR-3B is higher compared to GSTR-2A???
- Should the above info consider ITC availed during Oct.18 – Mar.19?
- The above table also captures the total ITC lapsed during the FY.

Part – IV: Details of tax paid as declared during the FY

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Part – V: Transactions for previous FY declared in Apr.-Sep.18

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Part – V

Tables 10 & 11: Supplies / tax declared / reduced through amendments (net of debit / credit notes)

Table 12: Reversal of ITC availed during the previous FY

Table 13: ITC availed for the previous FY

Table 14: Differential tax paid / payable

Should be filled with:

Transactions (pertaining to 9M, FY18) recorded in GSTR of *Apr.-Sep.18*

Should outward supply & *ITC availed* info (recorded in GSTR of Oct.18–Mar.19) be recorded here?

Source for filling

Outward supplies:
From GSTR-1

ITC related information:
From GSTR-3B

Part VI: Other Information

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Demands (paid / pending)

Refunds (claimed / sanctioned / rejected / pending)

Supplies from composition dealer

Deemed supply – related to job work

Goods sent on approval but not returned within 180 days

HSN-wise summary of outward supplies

HSN-wise summary of inward supplies #

Late fee payable / paid

– If the individual component is > 10% of total value of inward supplies

– Denominator to exclude value of non-supplies (e.g., salaries)!

A Few Key Points

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Can GSTR-9 be revised?

No

How to pay *additional liabilities*?

Form GST
DRC-03

Mode of payment of additional liabilities?

Only from e-cash ledger!

Thank You

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