

## ***CBIC extends compliance due dates in some cases, notifies format of GST audit report and notifies effective date of TDS/ TCS provisions under GST Act***

September 17, 2018

### ***In brief***

CBIC has issued notifications nos. 43-51/2018-Central Tax and circular no. 62/2018-GST. The notifications extend compliance due dates in some cases, notify format of GST audit report and notify the effective date of tax deducted at source (TDS)/ tax collected at source (TCS) provisions under GST. The major amendments/ clarifications are summarised below.

### ***In detail***

#### ***Extension of due dates***

Notification nos. 43/2018 to 48/2018 extend the due dates for various compliances/ filings. The revised due dates are as under:

<b>Sr. No.</b>	<b>Notification</b>	<b>Return/ Form</b>	<b>Period</b>	<b>Due date of submission</b>
1	43/2018	GSTR 1 for assesseees that need to file returns on quarterly basis.	July, 2017 to September, 2018 October, 2018 to December, 2018 January, 2019 to March, 2019	31 October, 2018  31 January, 2019  30 April, 2019  Due date for assesseees in Kerala and assesseees with registered office in Kodagu and Mahe is 15 November, 2018 for the quarter July, 2018 to September, 2018.  For newly migrated assesseees, the due date for the quarters from July, 2017 to September, 2018 is 31 December, 2018.

Sr. No.	Notification	Return/Form	Period	Due date of submission
2	44/2018	GSTR 1 for assesseees that need to file returns on monthly basis.	July, 2017 to September, 2018 October, 2018 to March, 2019	31 October, 2018  Eleventh day of the next month  For newly migrated assesseees, the due date for the months from July, 2017 to November, 2018 is 31 December, 2018.
3	45/2018, 46/2018, 47/2018	GSTR 3B for newly migrated assesseees	July, 2017 to November, 2018	31 December, 2018
4	48/2018	TRAN 1 where registered persons could not submit it by the due date on account of technical difficulties		Commissioner empowered to extend the due date for submission of Form TRAN 1 up to 31 March, 2019 for cases where the registered persons could not submit it by the due date on account of technical difficulties, where the council recommends such extension.  Further, the assesseees covered in the above cases can submit Form TRAN 2 by 30 April, 2019.

### Other important amendments

#### GST Audit format notified

GST rules are amended to notify the GST audit report format and reconciliation statement in Form GSTR 9C, by notification no. 49/2018 dated 13 September, 2018.

#### TDS/ TCS provisions notified

- Provisions of section 51 of the CGST Act, 2017 relating to TDS, are made effective from 1 October, 2018 by notification no. 50/2018 dated 13 September, 2018 for the following **class of persons**:
  - A department or establishment of the Central Government or State Government;
  - Local authority;
  - Governmental agencies;
  - An authority or a board or any other body –

- set up by an Act of Parliament or a State Legislature; or
- established by any Government, with 51% or more participation by way of equity or control, to carry out any function.
- Society established by the Central Government or the State Government or a Local Authority under the Societies Registration Act, 1860 (21 of 1860);
- Public sector undertakings.
- Provisions of section 52 of the CGST Act, 2017 relating to TCS by **e-commerce operators**, are made effective from 1 October, 2018 as per notification no. 51/2018 dated 13 September, 2018.

#### Clarification on levy of GST on PSLC

- Circular no. 62/2018 dated 12

September, 2018 has clarified as under:

- GST on priority section landing certificates (PSLCs) for the period 1 July, 2017 to 27 May, 2018 is payable by the seller bank on forward charge basis.
- A GST rate of 12% will be applicable on supply of PSLCs.

### The takeaways

The extension of compliance due dates is a welcome step, allowing the businesses an opportunity to fulfil their pending filing obligations without any penal consequences. The release of GST Audit report format was much awaited and would now enable businesses to commence the audit process. The information sought for and the audit report has to be provided GSTIN-wise, and multi-location entities have to quickly collate the various information sought

for GSTIN-wise considering the timeline for submission of the report by 31 December (this date is not extended as of now). The industry was hoping for introduction of TDS and TCS

from the beginning of the next financial year, so as to avoid overlap, reduce mid-year transitions and also complete other pending compliance obligations.

***Let's talk***

For a deeper discussion of how this issue might affect your business, please contact your local PwC advisor

## Our Offices

### Ahmedabad

1701, 17th Floor, Shapath V,  
Opp. Karnavati Club,  
S G Highway,  
Ahmedabad – 380051  
Gujarat  
+91-79 3091 7000

### Hyderabad

Plot no. 77/A, 8-2-624/A/1, 4th  
Floor, Road No. 10, Banjara Hills,  
Hyderabad – 500034  
Telangana  
+91-40 44246000

### Gurgaon

Building No. 10, Tower - C  
17th & 18th Floor,  
DLF Cyber City,  
Gurgaon – 122002  
Haryana  
+91-124 330 6000

### Bengaluru

6th Floor  
Millenia Tower 'D'  
1 & 2, Murphy Road, Ulsoor,  
Bengaluru – 560 008  
Karnataka  
+91-80 4079 7000

### Kolkata

56 & 57, Block DN.  
Ground Floor, A- Wing  
Sector - V, Salt Lake  
Kolkata – 700 091  
West Bengal  
+91-033 2357 9101/  
4400 1111

### Pune

7th Floor, Tower A - Wing 1,  
Business Bay, Airport Road,  
Yerwada, Pune – 411 006  
Maharashtra  
+91-20 4100 4444

### Chennai

8th Floor  
Prestige Palladium Bayan  
129-140 Greams Road  
Chennai – 600 006  
Tamil Nadu  
+91 44 4228 5000

### Mumbai

PwC House  
Plot No. 18A,  
Guru Nanak Road (Station Road),  
Bandra (West), Mumbai – 400 050  
Maharashtra  
+91-22 6689 1000

### For more information

Contact us at  
[pwctr.knowledgemanagement@in.pwc.com](mailto:pwctr.knowledgemanagement@in.pwc.com)

## About PwC

At PwC, our purpose is to build trust in society and solve important problems. We're a network of firms in 158 countries with more than 236,000 people who are committed to delivering quality in assurance, advisory and tax services. Find out more and tell us what matters to you by visiting us at [www.pwc.com](http://www.pwc.com)

In India, PwC has offices in these cities: Ahmedabad, Bangalore, Chennai, Delhi NCR, Hyderabad, Jamshedpur, Kolkata, Mumbai and Pune. For more information about PwC India's service offerings, visit [www.pwc.com/in](http://www.pwc.com/in)

PwC refers to the PwC International network and/or one or more of its member firms, each of which is a separate, independent and distinct legal entity. Please see [www.pwc.com/structure](http://www.pwc.com/structure) for further details.

©2018 PwC. All rights reserved

## Follow us on:



For private circulation only

This publication has been prepared for general guidance on matters of interest only, and does not constitute professional advice. You should not act upon the information contained in this publication without obtaining specific professional advice. No representation or warranty (express or implied) is given as to the accuracy or completeness of the information contained in this publication, and, to the extent permitted by law, PwCPL, its members, employees and agents accept no liability, and disclaim all responsibility, for the consequences of you or anyone else acting, or refraining to act, in reliance on the information contained in this publication or for any decision based on it. Without prior permission of PwCPL, this publication may not be quoted in whole or in part or otherwise referred to in any documents.

© 2018 PricewaterhouseCoopers Private Limited. All rights reserved. In this document, "PwC" refers to PricewaterhouseCoopers Private Limited (a limited liability company in India having Corporate Identity Number or CIN : U74140WB1983PTC036093), which is a member firm of PricewaterhouseCoopers International Limited (PwCIL), each member firm of which is a separate legal entity.