

### Venu & Vinay Chartered Accountants

Chamrajpet, Bangalore

### Overview

- Basics of returns
- Errors and rectifications in GSTR-3B
- Errors and rectifications in GSTR-1
- Challenges in GSTR-2A Recon
- Challenges in Refunds

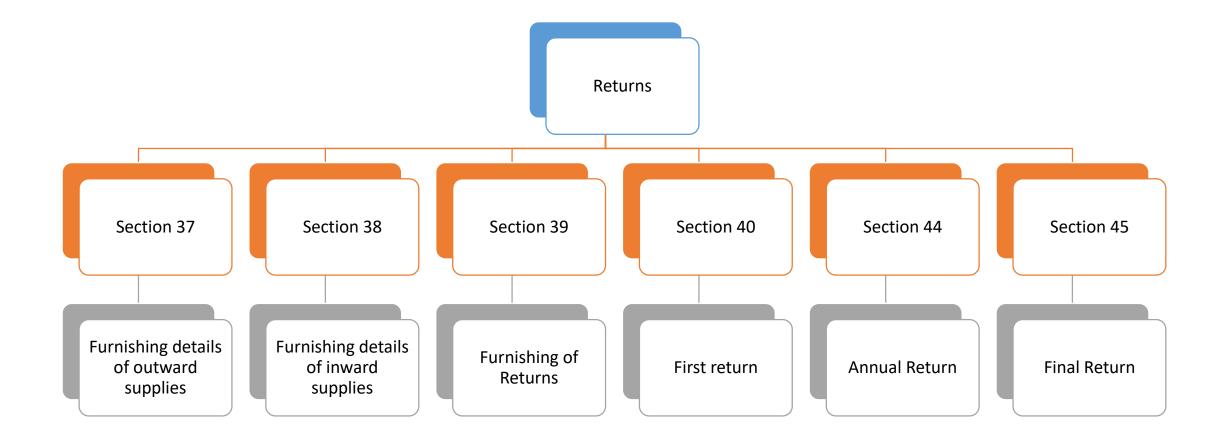
# Basics of Returns

# What is a Return ?

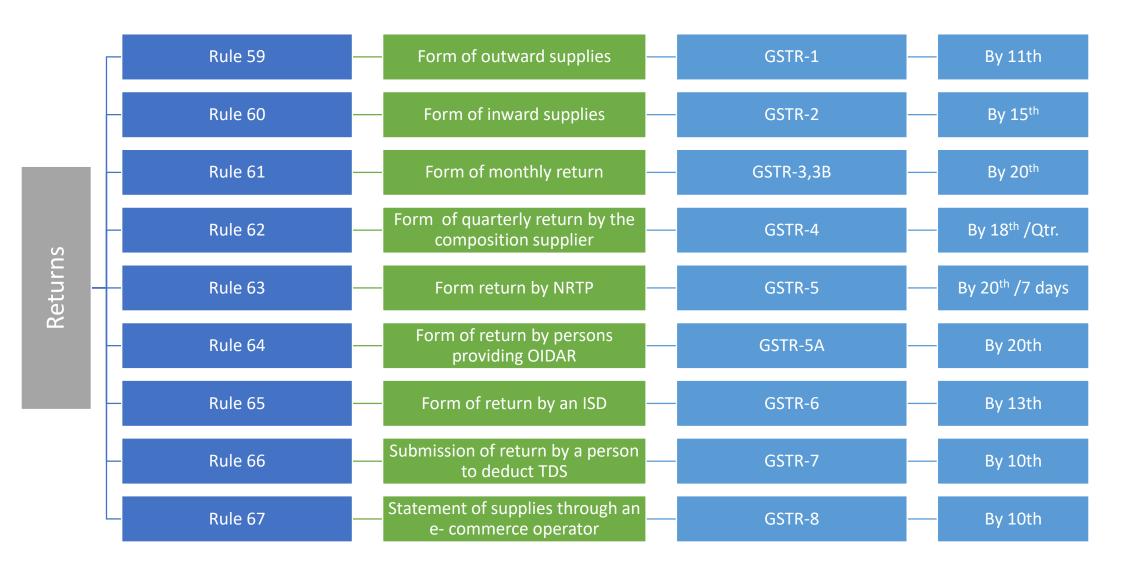
### • The term "return" ordinarily means

- Statement of information (facts)
- Furnished by taxpayer
- To tax administrators
- At regular intervals
- In any law, "filing of returns" constitutes the most important part of compliance procedure which enables
  - Govt./tax administrator to estimate the tax collection for a particular period and
  - Determine the correctness and completeness of tax compliance of taxpayers



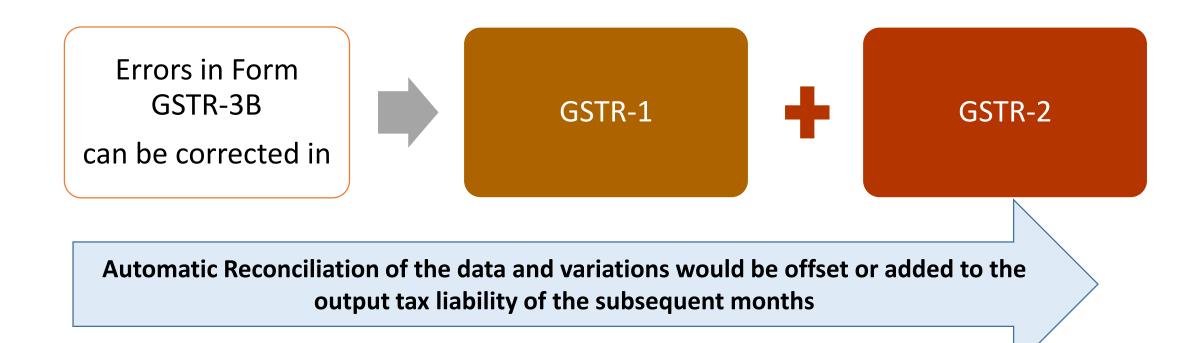


## Returns- Chapter VIII of CGST Act



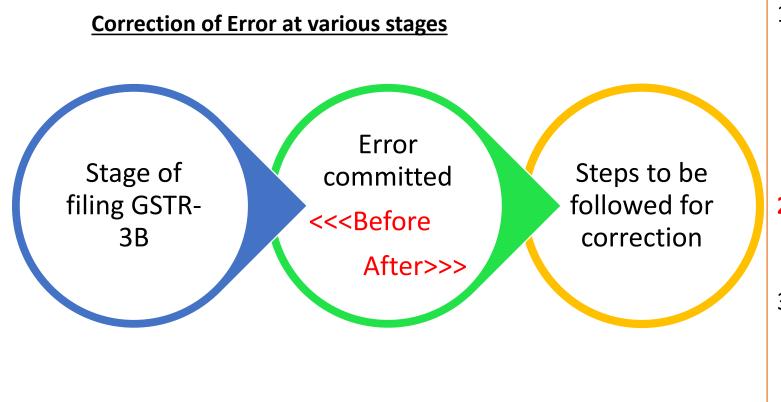
# Rectification of Errors

# Circular No. 7/7/2017-GST – 1st Sept 2017



As the time period for filing GSTR-2 and GSTR-3 has not been notified, the automatic reconciliation mentioned in Circular No.7/7/2017-GST can be operationalised once the above is notified

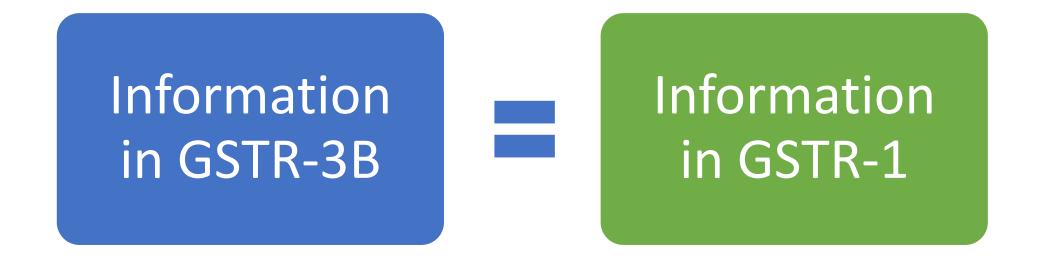
# Circular 26/26/2017 – GST – 29th Dec 2017



#### **Additional Points**

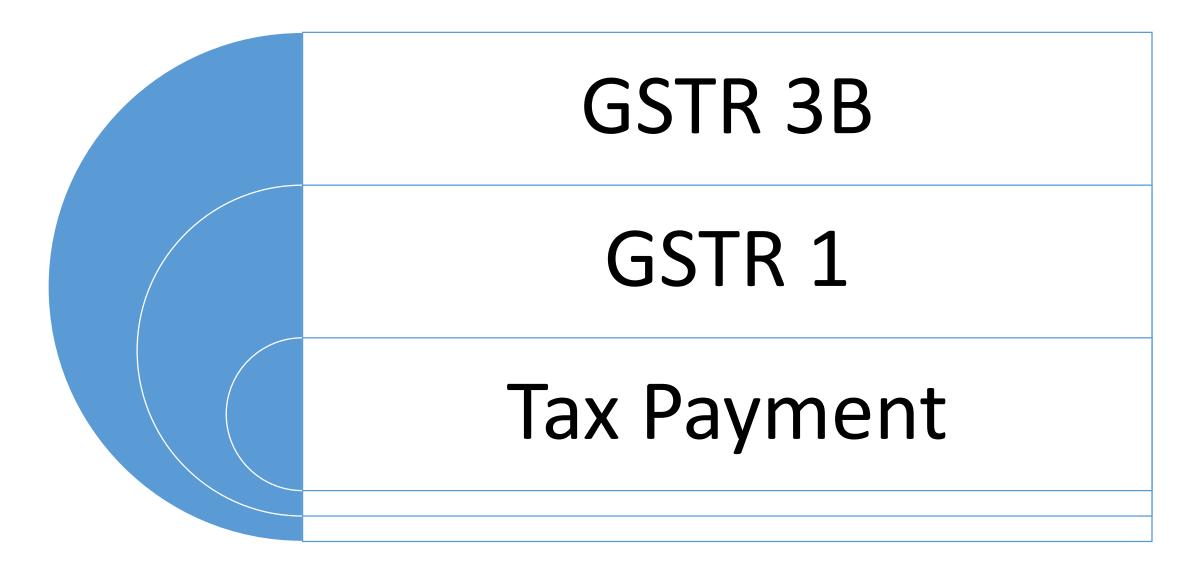
- The Differential figures <u>cannot</u> be reported in GSTR-3B for the previous months, Same shall be reported on a **net basis** with the current month
- 2. There can be no **NEGATIVE** entries in GSTR-3B
- Adjustments made in GSTR-3B, corresponding amendments <u>need to be made</u> in subsequent GSTR-1

# Reconciliation of GSTR-1 and GSTR-3B (YTD)



In case of any discrepancies the same shall be dealt in accordance with the provisions of CGST Act 2017

## Outcome from Circular 26/2017 : Errors in



# Errors in GSTR-3B

# GSTR 3B: List of Tables

Table No	Description
1	GSTIN
2	Legal Name of Registered person
3.1	Liability = Outward Supplies + Inward Supplies liable to Reverse Charge
3.2	Interstate supplies to Unregistered, Composition taxable persons and UIN Holders
4	Eligible ITC = Total ITC – (T1+T2+T3) subject to apportionments
5	Exempt, Nil rated and Non-GST inward supplies
6.1	Payment of Tax
6.2	TDS/TCS Credit

# Stages of filing GSTR-3B

# Cash Ledger Updated

# Offset Liability

# **Return Filed**

# Types of Errors

Liability	Liability was over reported
	Liability was under reported
	Liability was wrongly reported
Input Tax	Input Tax Credit was over reported
Credit	Input Tax Credit was under reported
	Input Tax Credit of the wrong tax was taken
Payment	Cash Ledger was wrongly updated

Turnover Wrongly Reported

# Errors in Table 3 of GSTR-3B

### Liability was over reported-GSTR-3B

### **Errors**

- 3.1 (a) Over Reported
  - Reported as Rs.50,000/- instead of 5,000/-
  - Reported Rs.9,600/- instead of 6900/-

- Liability may be adjusted by reducing in the return of subsequent months <u>or</u>
- 2. Refund to be claimed where adjustment is not possible
- 3. There cannot be a NEGATIVE entries in GSTR 3B

## Liability was under reported-GSTR-3B

#### **Errors**

- 3.1 (a) Under Reported
  - Reported Rs 6,895 /- instead of Rs.8,695/-
  - Reported Rs 2,600 /- instead of 6,200/-

- 1. Liability shall be added in return of subsequent months
- 2. To the extent short remitted, interest shall be calculated and paid @18% per annum for the Number of days of the delay.

# Liability was Wrongly reported-GSTR-3B

### **Errors**

### 3.1 (a) Wrongly Reported

- Reported as IGST Rs.100 instead of (C+S) Rs.50/- + Rs. 50/-
- Reported (C+S) Rs.300/- + Rs. 300/-instead of (IGST) Rs.600/-

### **Resolution Options**

- Unreported Liability may be added in the Next month return with interest, If applicable.
- If cannot be adjusted then, adjustment may be made in the subsequent months or
- 3. Refund may be claimed where adjustment is not possible.

# Wrongly updated-GSTR-3B Table No.3.1

#### **Errors**

 Zero rated outward supplies (With Payment of Taxes) Reported in 3.1 (a) instead of 3.1(b)

- While filing their Form GSTR-3B return, subsequent months Net of the between 31.(a) and (b)
- 2. If the turnover cannot be adjusted in 3.1(a), Disclose the full value to 3.1(b) and then report 3.1(a) as NIL and carry forward the difference / unadjusted to subsequent periods

### Not Disclosed

### **Errors**

3.1 (d)Inward supplies (liable to reverse charge) Not disclosed and not paid

3.1 (c) and (e) : Exempt / Non GST Supplies Not disclosed in the returns

### **Resolutions**

1. Disclose in subsequent periods and remit along with Interest.

- a) Add in Subsequent Returns not later than March
- b) Earlier period values can be disclosed in Table 5 of GSTR 9

# Errors in Table 4 of GSTR-3B

# 3B Filing – Table 4- ITC

- (A) ITC Available (whether in full or part)
  - (1) Import of goods
  - (2) Import of services
  - (3) Inward supplies liable to reverse charge (other than 1 & 2 above)
  - (4) Inward supplies from ISD
  - (5) All other ITC

### • (B) ITC Reversed

- (1) As per rules 42 & 43 of CGST Rules
- (2) Others
- (C) Net ITC Available (A) (B)
- (D) Ineligible ITC
  - (1) As per section 17(5)
  - (2) Others

## Input Tax Credit was Over reported-GSTR-3B

### **Errors**

### Table 4 (A)

- 4 (A)(5) In place of Rs.1000/reported as 10,000/-
- 4 (A)(5) In place of Rs.3600/reported as 6,300/-

- 1. Reduce the ITC in 4A of Subsequent month.
- 2. If cannot be reduced then
  - 1. report it under 4B of subsequent month.
  - 2. Pay the liability through cash or balance in Credit Ledger
- Pay interest in subsequent return if reversal creates a liability.

## Input Tax Credit Under reported-GSTR-3B

### **Errors**

### Table 4 (A)(5)

- Reported as Rs.100/- instead of Rs.1000/-
- Reported Rs.4,500/- instead of Rs.5,400/-

### Resolutions

 Input tax credit which was not reported may be availed while filing subsequent month return

## Input Tax Credit was wrong reported-GSTR-3B

### **Errors**

In table 4 (A)

- In place of (C+S) Rs.50/- + 50/credit reported under IGST as Rs.100/-
- In place of (C+S) Rs-50/- + 50/-IGST Rs-100/-

- 1. Pay (through cash)/Reverse any wrongly reported input tax credit in return of subsequent months.
- For under reported input tax credit, the same may be availed in return of subsequent months
- 3. Interest need not be paid
  - 1. Sec 77(2) of CGST Act
  - 2. Sec 19(2) of IGST Act

# ITC under wrong table -GSTR-3B Table No.4

### **Errors**

Wrong reporting under Table 4A

- 4(A)(1) IGST paid on import, but ITC claimed in table 4A(5).
- ISD Credit instead of reporting under 4A(4) reported in 4A(5)

Or vice versa

- Rectify While filing Form GSTR-3B in subsequent months by reducing 4(A) (5) add in respective months
- 2. If adjustment is not possible, report in the correct head and reverse in Table 4B the earlier month credit.
- 3. IF NO such action is taken sum of Table 4A to be properly corrected and reported in Table 6 of GSTR9

### ITC Not reversed

### **Errors**

- Reporting of the Credit
  - Eligible in 4A
  - In eligible in 4D
- Eligible but attract reversal,
  - Gross Value to report in 4A
  - Reversal to report in 4B
- Error in Reversal
  - 4D reported in 4A
  - 4B reversal not made

- Rectify While filing Form GSTR-3B in subsequent months by reporting it in Table 4B
- 2. Values can be reported even if table 4A is NIL
- 3. Liability can be Paid through cash
- 4. Can be paid through opening balance in Credit
- 5. Interest applicable if reversal results in short payment of taxes.

# Errors in Payment of Tax

# Cash Ledger was wrongly updated-GSTR-3B

### **Errors**

- 6.1 In place of (IGST) Rs-100/-(C+S) Rs – 50/- + 50/-
- Taxes to be remitted is C+S but in Payment challan they are remitted in IGST

- 1. Right taxes to be remitted again under correct head.
- 2. Adjustment of Double payment
  - 1. Short payment in subsequent month
  - Excess balance in Electronic
     Cash Ledger can be claimed as Refund

# Other disclosure errors

### No Disclosure in GSTR-3B

### **Non Reporting**

Non Reporting

- 3.1(b) Zero-rated transactions under LUT (Discrepancies during ITC refund Process)
- 3.1(c) Outward Exempted,
- 3.1(e) Non GST Supplies

- Can be reported in Subsequent month GSTR 3B till March
- Post March report it in Table 5 of GSTR 9

### No Disclosure in GSTR-3B

### **Non Reporting**

- Disclosure of Table no.3.2 Inter state supply to
  - URD,
  - Composition and
  - UIN

### Resolutions

 Can be reported in Subsequent month GSTR 3B till March on YTD Basis

# Other Common Errors

### 1. Non Disclosures

- Ineligible ITC u/s 17(5)- Table 4D Even though the credits are not availed in GSTR 3B Table 4A, they are not disclosed. Eg: 17(5) Blocked Credits: Food, Rent a CAB etc.
- 2. Table 5 : To report
  - 1. Disclosure Inward Exempt, Nil-rated
  - 2. Purchases from Composition Dealer
  - 3. Non-GST.

Advantages of Reporting

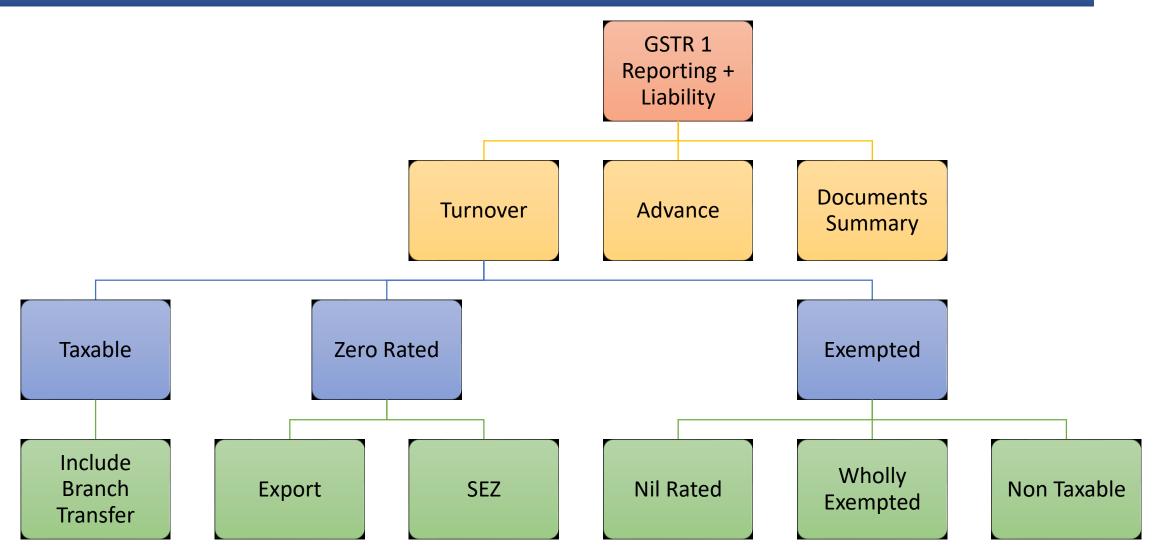
- 1. Reconciliation with P&LD debits, like Interest Expenditure, Depreciation
- 2. Verification of missed out credits
- 3. Early detection of applicable RCM Liabilities
- 4. Avoidance of Interest payments.

# Errors in GSTR-1

# Outward Supply – GSTR – 1 – Section 37

- Every registered taxable person other than
  - an ISD
  - a NR taxable person and
  - a person paying tax under the provisions of COT or TDS or TCS,
  - shall furnish, electronically, the details of outward supplies of goods or services effected during a tax period
  - on or before the 11th of the month succeeding the said tax period or such extended time and
  - such details shall be communicated to the recipient of the said supplies within the time and in the manner as may be prescribed (Section 37).
- Details of Outward supply means details of invoices, debit notes, credit notes and revised invoices issued.

# Details to be furnished in GSTR-1



# Level of Reporting

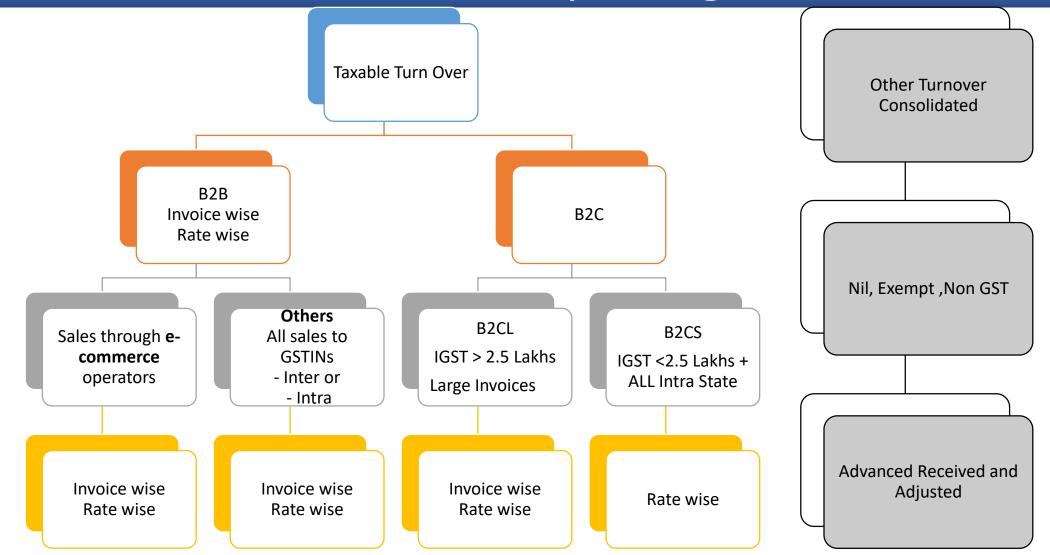


Table No	Parts	GSTR 1
1-3		Basic Information
4	A,B & C	B2B Invoices including RCM & E-commerce
5	A & B	Supplies to unregistered persons (Inter - state) Large Invoices > 2.5 Lacs
6	A, B & C	Zero rated supplies and deemed exports
7		B2C (Net of debit and credit notes) other than supplies covered in Table 5
8	A,B,C & D	Nil rated, Exempted and Non GST outward supplies*
9	A,B & C	Amendments in Table 4, 5 and 6 for earlier tax periods
10	A & B	Amendments in Table 7 for earlier tax periods
11A	1&2	Tax Liability (Advances received)
11B	1&2	Adjustment of advances
11A		Amended tax liability (Advance received)
11B		Amendment of Adjustment of advances
12		HSN-wise summary of outward supplies
13		Documents issued during Tax period.

### **Errors**

- Wrong Data Entry
  - GSTIN
  - Invoice Number
  - Date
  - Place of Supply
  - Others

- Amendment to be made in the subsequent months,
- in Table No.9A
- Select old Invoice Number
- Retrieve Data
- Amend necessary particulars

#### **Errors**

### B2B reported as B2C

 Transaction relating to an unregistered person shown as transaction from a registered person

### Resolutions

- Add it in Table 4 of GSTR 1 of Subsequent month
- Amend B2C of previous month in GSTR 10

Note : If an Invoice is originally issued as B2C it cannot be amended as B2B later.

It is applicable only for wrong reporting

### **Errors**

- A Transaction of 4A erroneously reported in 4B
- i.e not attracting RCM, marked as supplies attracting RCM.
  - Supply attract Reverse Charge

### Resolutions

- Amendment to be made in the subsequent months, Table No.9
- Retrieve the old invoice
- Unmark Supply attracting reverse charge

Supply attract Reverse Charge

### **Errors**

- Missed out reporting
- B2B Transaction not disclosure in the GSTR-1

- Add not disclosure of transaction subsequent month returns in the regular Table i.e 4A
- Earlier For FY 2017-18, this restriction was there till Sept 2018, by ROD 2/2019 this is now extended till March 2019.
- Any missed out transactions of 17-18 can now be reported.

### **Errors**

- Error in the Value reported
  - Reported with a Higher Value,
  - Reported with a Lower Value,
  - Reported with a Higher Tax,
  - Reported with a Lower Tax,

- 1. Amendment to be made in the subsequent months,
- 2. in Table No.9A
- 3. Select old Invoice Number
- 4. Retrieve Data
- 5. Amend necessary particulars

### **Errors**

 B2B Transaction disclosed as a Deemed Exports

- Amendment to be made in the subsequent months,
- in Table No.9A
- Select old Invoice Number
- Retrieve Data
- Uncheck the line item Deemed Exports

#### **Errors**

• B2B Transaction disclosed as Sales from Bonded WH

- Amendment to be made in the subsequent months,
- in Table No.9A
- Select old Invoice Number
- Retrieve Data
- Uncheck the line item Sales from Bonded WH

#### **Errors**

- Wrong Disclosure of Export to SEZ / Exports
- Originally made under LUT but marked in GSTR 1as With payment of Taxes (WPA)
- Sold with payment of taxes, paid taxes in 3B, however in GSTR 1 reported as WOPAY.

- Amendment to be made in the subsequent months,
- in Table No.9A
- Select old Invoice Number
- Retrieve Data
- Alter (WOPAY / WPA) accordingly.

### **Errors**

- Export details not filled or wrongly filled
  - Non Disclosure of Export Sales Port code and Shipping Bill No/Bill of Export no

- Amendment to be made in Next month
- If error not corrected the refund would not get processed.
- Proper reconciliation to be made between 3B and GSTR 1

### **Errors**

- Tax mismatch in Exports
  - Export Invoice disclosed with a different rate of tax,
  - Either Higher or Lower

- Data as per shipping Bill to match with GSTR 1
- Forex conversion in books is of no relevance for GSTR 1
- In Exports Assessable value to be adopted based on Shipping
- All particulars to be matched based on SBN
- Amendment to be made in the subsequent months, Table No.9A

#### **Errors**

 Disclosure of B2C sales Included B2B

- Amendment to be made in the subsequent months,
- Table No.10 (Change only particular rate of tax and add in the B2B sales )
- Special care to be taken for NOT deleting or marking of ZERO to other rates of taxes

#### **Errors**

• Disclosure of place of supply (Sate Code 37 to 29)

Revised/Original State Code (Place of Supply)\*

29-Karnataka

v

### Resolutions

• Amendment to be made in the subsequent months, Table No.10

Revised/Original State Code (Place of Suppl

37-Andhra Pradesh

#### **Errors**

• Non disclosure of Nil, Exempt and Non-GST supplies

- Add in table no.8 of subsequent months.
- Bifurcation based on Interstate ,Intra state, registered and unregistered
- No Addition to be made after March
- Missing data to be reported in GSTR 9 Table 5

#### **Errors**

- How to move B2B to B2c.
- How many times an invoice can be amended?
- Can GSTIN to be amended?
- Can Original Invoice Number amend?

- Make B2b sales "Zero"
- Only once, B2b can be amended

- Yes GSTIN can be amended
- Invoice number cannot be amended. You can add Correct Invoice Number.

# Errors in Table No.10 of GSTR-1

#### **Errors**

- How to move B2c to B2b.
- How many times an invoice can be amended?
- Can GSTIN to be amended?
- Can Original Invoice Number amend?

- Can reduce the B2c sale and add B2b sale current months with last month date.
- B2c sales can amended only once
- GSIN Not applicable for B2C
- Invoice number is not reported for B2C

# Errors in Table No.11 of GSTR-1

#### **Errors**

### Resolutions

• Non disclosure of GST paid on Advance in GSTR-1

• In Subsequent months to be add (+) in GSTR-1 Table no.11A

# Errors in Table No.11 of GSTR-1

#### **Errors**

- Advance Adjusted in the GSTR-3B when invoice is raised , and not disclosed in the GSTR-1
- In subsequent months to be add (+) in GSTR-1 Table no.11B

# Errors in Table No.12 of GSTR-1

### **Errors**

• GST on Advance added in the HSN summary

### Resolutions

 Subsequent month to be reduced (-) in GSTR-1 Table no.12

# Errors in Table No.12 of GSTR-1

#### **Errors**

• HSN summary disclosed including CN and DN

### Resolutions

• Subsequent months to be Net off in table no.12

# Non Disclosure for Outward Supply GSTR-1

### • Wrong disclosure of B2C Sales

- Including DN and CN
- Ecommerce/ other than ecommerce
- State and Rate Wise
- Non-Disclosure of Exempted supply
  - State wise Inter-state and Intra-state Registered and un-Registered
- HSN Not updated in the table no 12
  - 0 to 1.5 crores- No HSN
  - 1.5 to 5 crores- 2digit
  - More than 5 crores- 4digit
- Quantity in HSN not disclosed
- Table 13: Document numbers not disclosed

# Errors Beyond Circular 26/2017

- HSN Summary
- Wrong reporting / non-reporting of exempted supply
- Document number details (invoice, DN, CN and Self invoice)
- HSN Code along with Advance paid liability?
- HSN Code No duplicates

# Technical issues in filing returns

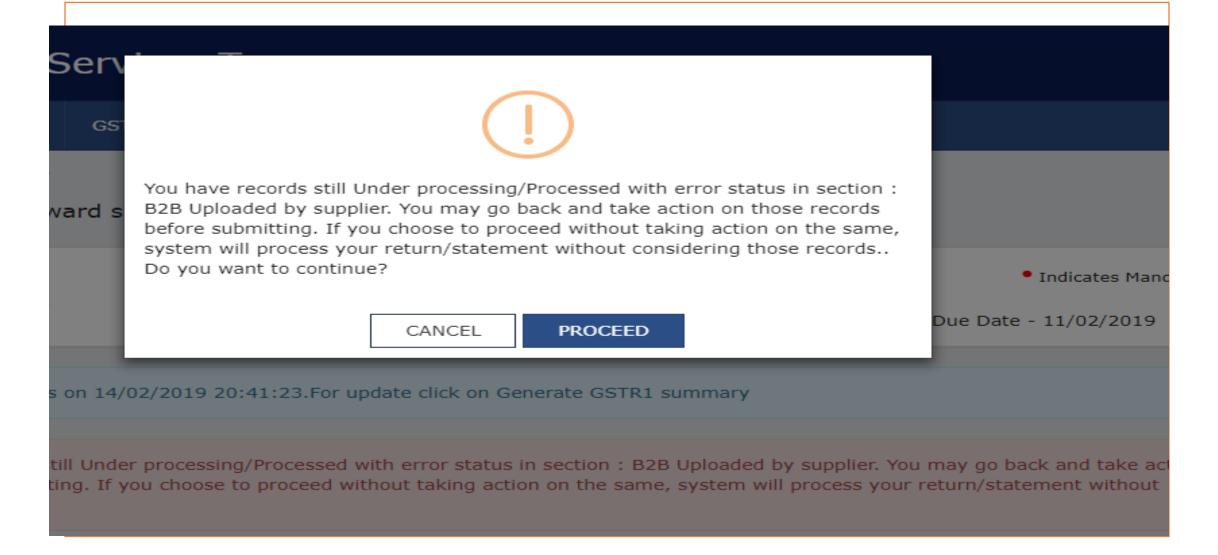
# Refresh Issue while filing GSTR-1 and 3B

- While filing GSTR-1 Error is "Summary for filing is not available at the time of submitting the return".
  - While filing through online ,issue prevails "please try again later " in table no..wise i.e...
    - Table no 7 B2c not updated
    - Table no 9 and 10 Amendment still process
    - HSN code not updated...
    - Document not updated...

# Refresh Issue in GSTR-1 and 3B

Dashboard	Services -	GST Law	Search Taxpayer 👻	Help 🗸	e-Way Bill System	
ashboard > Ret	turns > File					🛛 English
<b>0</b> Error! Su	mmary for Filing	g is not Genera	ated or is not available a	t this time. I	Please try again later	
					•	Indicates Mandatory Fields
GSTIN - 29A	AACO2467Q1ZS	5	Legal Name - ORION LIMITED	PRECAST PR	IVATE Return Type -	GSTR1
FY - 2018-1	9		Return Period - Janua	ry	Status - Subm	litted
						Refresh
Returns F	iling for GST	GSTR1				2
			that the information given concealed therefrom		oove is true and correct	to the best of my/our
				BACK	FILE WITH DSC	FILE WITH EVC

# Refresh Issue in GSTR-1 and 3B



# Issues in GSTR-2A Recon

# **GSTR-2A Recon**

- GSTR-2A is dynamic
- Invoice number mismatch with the books and GSTR-2A
- Consolidated GSTR-2A not available at once
- Vendors uploaded in subsequent months with invoice date of the previous month. Data would reflect in GSTR-2A of the month in which it is filed
  - For example: Invoice date 20-07-2018, filed in Aug'18. Entry would appear in GSTR-2A of Aug'18.

# Issues in Refund

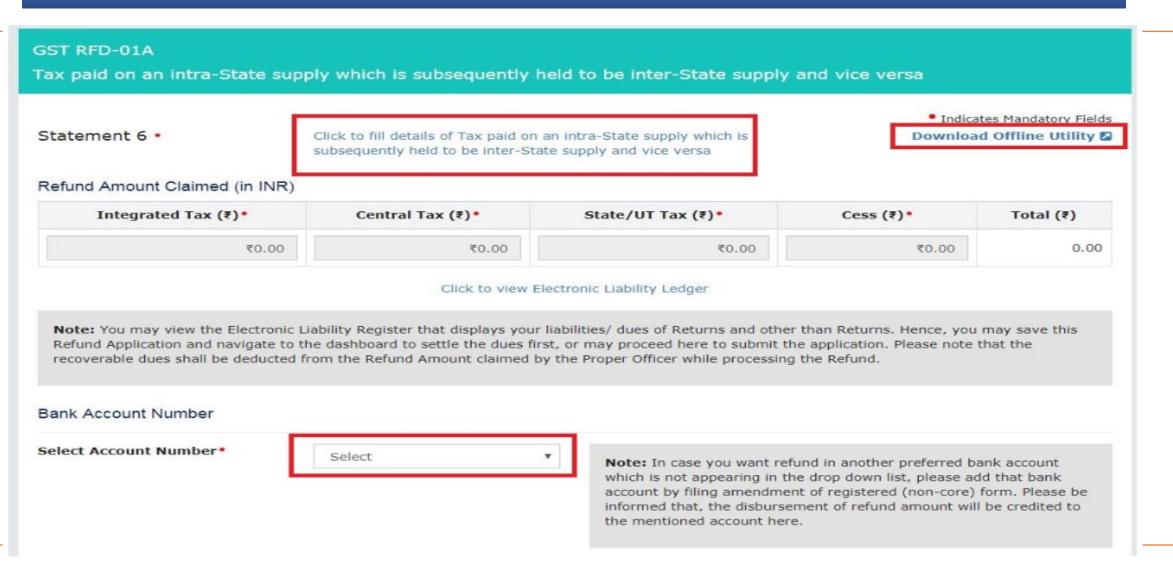
# **Technical Glitches for Refund**

- Circular 37/2018:
- Wrong updation of Port Code or SBN use Table 9 of GSTR-1
- Mismatch between values reported in GSTR-1 vis-à-vis 3B
- Wrong reporting of Zero-Rated to in 3B, properly reported in GSTR-1 overwriting the Validation check

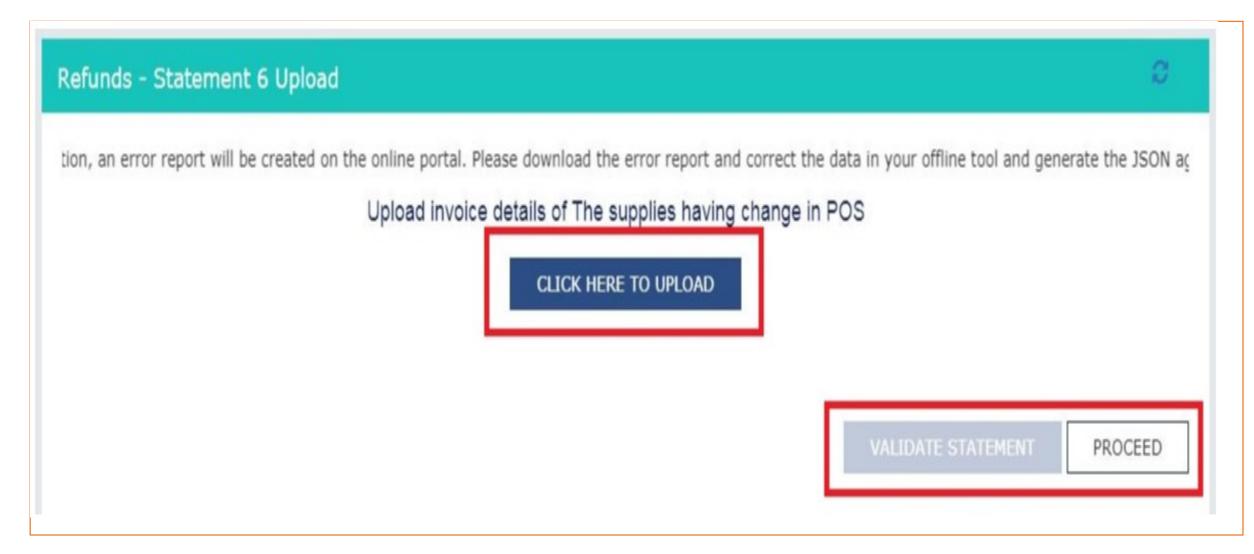
# **Technical Glitches for Refund**

۲	Tax paid on an intra-State supply which is subsequently held to be inter-State supply and vice versa	CREATE
0	On account of Refund by Supplier of deemed export	CREATE
0	Any other (specify)	CREATE
0	Excess payment of tax	CREATE
0	On Account of Assessment/Provisional Assessment/Appeal/Any other order	CREATE

### GST RFD-01A



# Refund statement 6



Important Message	
Important Message	
<ol> <li>Once you fill the details in relevant Tables, Please save the form to proceed to Submit. Please <u>correct an</u> proceeding to submit.</li> <li>Application can be saved at any stage of completion for a maximum time period of 15 days. If the same is date of form creation, the saved draft will be purged from the GST database.</li> </ol>	
Upload Supporting Documents	
Enter Document Description	Only PDF file format is allowed.
	Maximum file size for upload is 5MB.
Choose File I lo file chosen	Maximum 4 supporting documents can be attached in the application. The remaining documents can be handed over in hard copy during personal hearing.
Note: Please make sure you have a validated statment and all the data filled to enable submit button	
BACK	SAVE PREVIEW SUBMIT

# Excess payment

0	Any other (specify)					CREATE	
۲	Excess payment of tax					CREATE	
0	On Account of Assessment/Pr	ovisional Assessment/	'Appeal/Any other	order		CREATE	
Tax F O Plea	se select Tax period for whic Period ase select months starting from cial Year •			e in month dropd	own.		
Sel	ect 🔻	Select	T				

# Details of excess payment

Tax	Type of	ARN of return	Date of filing		Tax Paid in	Excess (₹)	
Period	return		return	Integrated Tax (₹)•	Central Tax (₹) •	State/UT Tax (₹) •	Cess (₹)•
July 2017	GSTR3B	AA290717448932K	25-08-2017	₹0.00	₹0.00	₹0.00	₹0.00
	Re	fund Claimed (in ₹)		0.00	0.00	0.00	0.0
Refund Ap dues shall	plication and na be deducted fro	Electronic Liability Regis wigate to the dashboard om the gross amount to rocessing the Refund.	ter that displays your I to settle the dues firs	st, or may proceed her	irns and other than e to file the applicat	ion. Please note that th	ne recoverable
Refund Ap dues shall Processing	plication and na be deducted fro	vigate to the dashboard om the gross amount to	ter that displays your I to settle the dues firs	liabilities/ dues of Retu st, or may proceed her	irns and other than e to file the applicat	ion. Please note that th	ne recoverable
Refund Ap dues shall Processing Bank Acco	plication and na be deducted fro Officer while p	vigate to the dashboard om the gross amount to	ter that displays your I to settle the dues firs	liabilities/ dues of Retu st, or may proceed her and Amount claimed in	irns and other than e to file the applicat the refund applicati	ion. Please note that th	ne recovera



For Clarifications, mail to venu@vnv.ca