

ADVISORY ON IMS DATED 8TH OCTOBER 2025

In a recent clarification, the Goods and Services Tax (GST) Network has confirmed that the auto-population of Input Tax Credit (ITC) from GSTR-2B to GSTR-3B will remain unchanged despite the rollout of the new Invoice Management System (IMS). The system will continue to auto-populate ITC data without manual intervention by taxpayers.

The GSTN further stated that GSTR-2B will continue to be auto-generated on the 14th of every month. The process requires no manual action from taxpayers and functions independently of their activity on the portal. However, taxpayers will retain the ability to take actions in the IMS after the generation of GSTR-2B and up to the filing of GSTR-3B. In such cases, GSTR-2B can be regenerated if necessary.

From the October 2025 tax period onward, significant flexibility will be introduced in the handling of Credit Notes. Recipient taxpayers may keep a Credit Note or related document pending for a specified duration before acceptance. Upon acceptance, taxpayers can manually adjust and reduce ITC only to the extent of its availment by entering the reversal amount as needed.

Source: <https://services.gst.gov.in/services/advisoryand-releases/read/628>

ADVISORY FOR GSTR 9/9C FOR FY 2024-25

The annual return forms GSTR-9 and GSTR-9C for the financial year 2024–25 have been enabled on the GST portal effective October 12, 2025. Taxpayers can now access and prepare their annual returns through the portal's designated tile for GSTR-9/9C.

Before proceeding with the filing of GSTR-9 or GSTR-9C, taxpayers must ensure that all monthly and quarterly returns (GSTR-1 and GSTR-3B) for FY 2024–25 have been properly filed and submitted. The activation of the GSTR-9/9C tile on the dashboard is contingent on the completion of these prerequisite filings.

The FAQs pertaining to the GSTR- 9/9C for FY 2024-25 can be accessed by following the url: https://tutorial.gst.gov.in/downloads/news/faq_on_gstr9_for_24_25_dt_15_oct_25_v6_final.pdf

Source: <https://services.gst.gov.in/services/advisoryand-releases/read/629>

INTRODUCTION OF “PENDING” OPTION FOR CREDIT NOTES AND DECLARATION OF REVERSAL AMOUNT IN IMS

The Goods and Services Tax Network (GSTN) has unveiled a new facility within the Invoice Management System (IMS) on the GST portal, providing greater flexibility for taxpayers in handling credit notes. The new feature allows taxpayers to mark credit notes as “Pending” for one tax period, offering additional time to review and reconcile transactions before taking any final action.

Alongside the new “Pending” feature, the IMS functionality has been enhanced to enable modification of Input Tax Credit (ITC) reversal upon acceptance of credit notes. This update allows taxpayers to adjust and reduce ITC only to the extent of its availment, ensuring more accurate reconciliations. The move is expected to address several recurring business disputes and promote smoother compliance processes.

To assist taxpayers in understanding and using this new facility effectively, Frequently Asked Questions (FAQs) can be accessed at: https://tutorial.gst.gov.in/downloads/news/creative_faq_on_gstr9_for_24_25_dt_15_oct_25_v6_final.pdf.

These FAQs provide clarifications on the operation, benefits, and procedural aspects of managing credit notes within IMS.

Source: <https://services.gst.gov.in/services/advisoryand-releases/read/631>

ADVISORY TO FILE PENDING RETURNS BEFORE EXPIRY OF THREE YEARS

In accordance with the Finance Act, 2023 (No. 8 of 2023) dated March 31, 2023, and implemented from October 1, 2023, through Notification No. 28/2023–Central Tax dated July 31, 2023, taxpayers will no longer be permitted to file their GST returns after three years from the due date of submission.

This restriction applies to returns filed under Section 37 (Outward Supplies), Section 39 (Payment of Liability), Section 44 (Annual Return), and Section 52 (Tax Collected at Source). The affected forms include GSTR-1, GSTR-1A, GSTR-3B, GSTR-4, GSTR-5, GSTR-5A, GSTR-6, GSTR-7, GSTR-8, GSTR-9, and GSTR-9C.

The new rule will be enforced on the GST portal beginning with the November 2025 tax period. Consequently, any pending return whose due date has exceeded three years by that period will be permanently barred from filing.

For ease of reference and better clarity, the latest GST returns that will be barred from filing w.e.f 1st December 2025 are detailed in the table below:

GST Forms	Barred Period (w.e.f. 1st December,2025)
GSTR-1/IFF	October-2022
GSTR-1Q	July-Sep 2022
GSTR-3B/M	October-2022
GSTR-3BQ	July-Sep 2022
GSTR-4	FY 2021-22
GSTR-5	October-2022
GSTR-6	October-2022
GSTR-7	October-2022
GSTR-8	October-2022
GSTR-9/9C	FY 2020-21

Source: <https://services.gst.gov.in/services/advisoryand-releases/read/633>

ADVISORY : INTRODUCTION OF IMPORT OF GOODS DETAILS IN IMS

The Goods and Services Tax (GST) portal's Invoice Management System (IMS), introduced from the October 2024 tax period, enables recipient taxpayers to accept, reject, or keep pending individual records uploaded by suppliers through GSTR-1, GSTR-1A, or IFF.

In a new development aimed at improving taxpayer convenience, the IMS has now been enhanced with a dedicated section for "Import of Goods." Under this feature, Bills of Entry (BoE) filed by taxpayers for import of goods, including those from Special Economic Zones (SEZs), will be made available within the IMS for review and action by recipients. This functionality will come into effect from the October 2025 tax period.

If no action is taken on an individual BoE, it will be treated as deemed accepted. Based on the actions taken, the GST portal will automatically generate the draft GSTR-2B for the recipient on the 14th day of the following month.

The detailed advisory on new changes can be accessed by following the given URL: https://tutorial.gst.gov.in/downloads/news/creative_advisory_on_boe_in_ims_final_30th_october_2025.pdf

Source: <https://services.gst.gov.in/services/advisoryand-releases/read/634>

NOTIFICATION (S) AND CIRCULAR (S)

NOTIFICATION NO.18/2025-CENTRAL TAX DATED 31ST OCTOBER 2025

The CBIC has issued this notification introducing pivotal amendments to the CGST Rules, 2017, effective November 1, 2025. The key feature is the insertion of Rule 9A, which mandates electronic grant of GST registration within three working days upon successful identification through data analysis and risk parameters on the common portal. This applies to normal registration (Rule 8), TCS/TDS registration (Rule 12), and non-resident taxable persons (Rule 17).

Additionally, Rule 14A has been introduced as an optional simplified registration for taxpayers with monthly output tax liabilities below ₹2,50,000, requiring Aadhaar authentication for eligibility. Registered person under this rule cannot obtain multiple registrations under the same PAN in the same State or UT.

These changes aim to expedite the registration process, reduce manual intervention, and provide a streamlined registration experience especially benefiting small taxpayers. Businesses are advised to ensure accurate data and timely compliance with these new rules for smooth GST registration.

Source: <https://taxinformation.cbic.gov.in/view-pdf/1010504/ENG/Notifications>

CIRCULAR NO. 254/11/2025-GST, DATED 27TH OCTOBER 2025

This Circular is issued by the Central Board of Indirect Taxes and Customs (CBIC) to assign "proper officers" for administering enforcement actions under certain key provisions of the CGST Act, 2017. The circular marks a significant administrative clarification and update for GST enforcement from FY 2024-25 onwards.

Section 74A: Pertains to the determination of tax not paid, short paid, erroneously refunded, or Input Tax Credit (ITC) wrongly availed or utilised, effective prospectively from financial year 2024-25.

Section 75(2): Relates to situations where appellate or revisional authorities direct fresh tax determination, specifying that the same adjudicating officer should act if no fraud/suppression is involved.

Section 122: Deals with offences and penalties, clarifying proper officer jurisdiction in penalty proceedings.

Rule 142(1A): Mandates pre-show cause notice communication (FORM GST DRC-01A) before issuing notices under Sections 73, 74, or 74A.

Proper Officer Assignment

The circular assigns roles to Superintendents, Deputy/Assistant Commissioners, and Additional/Joint Commissioners of Central Tax, with function and jurisdiction defined in accompanying tables based on monetary limits of tax and penalty involved.

Proper officer designation is necessary for the validity and enforceability of demand, penalty, and recovery proceedings under the CGST Act.

Source: <https://taxinformation.cbic.gov.in/view-pdf/1003295/ENG/Circulars>

CIRCULAR NO. 253/10/2025-GST, DATED 1ST OCTOBER 2025

The CBIC has issued this Circular withdrawing an earlier circular that mandated additional documentary compliance related to post-supply discounts under GST. This move aims to ease the compliance burden on suppliers and promote uniform implementation of GST provisions across the country.

The withdrawn Circular No. 212/6/2024-GST, issued in June 2024, had required suppliers to furnish evidence such as declarations or certificates proving compliance with Section 15(3)(b)(ii) of the CGST Act. This section governs the exclusion of post-supply discounts from taxable value, provided the discount conditions are agreed upon at or before supply and the recipient reverses the related Input Tax Credit (ITC).

Source: <https://taxinformation.cbic.gov.in/view-pdf/1003292/ENG/Circulars>