GST ANNUAL RETURN

- **M. RAVITEJA** (ACA)

GST ANNUAL RETURN

It is a type of return applicable to all the "Registered Person's" for a Financial Year as per GST Act.

There are various type of forms for various type of Registered Person's.

Types of GST Annual Return Forms

- GSTR – 9
- GSTR – 9A
- GSTR – 9B
- GSTR – 9C

GSTR - 9

Every Registered Person other than following shall require to furnish an annual return in Form "GSTR – 9"

(Section 44(1) of the CGST Act, 2017 read with rule 80 of the CGST Rules and Notification No. 39/2018 – Central Tax)

- **Input Service Distributor**
- **A Casual Taxable Person**
- **Persons to whom TDS Provisions will apply**
- **A Non-Resident Taxable Person**

GSTR – 9A

A person paying tax under section 10 (i.e. Composition Dealer) shall require to furnish the Annual Return in FORM GSTR-9A

[Rule 80 of the CGST rules and Notification No. 39/2018 – Central Tax]

GSTR – 9B

Every electronic commerce operator required to collect tax at source under section 52 shall furnish annual statement in FORM GSTR -9B.

Note **: as TCS provision is made applicable from 1st October 2018. Hence, for FY 2017-18 Form GSTR-9B is not applicable**

GSTR – 9C

A registered person whose aggregate turnover during a financial year exceeds ₹ 2 crores shall require get his accounts audited by GST auditor to submit a reconciliation statement duly certified, in FORM GSTR-9C.

[Section 44 (2) of the CGST Act, 2017 read with rule 80 of the CGST rules and Notification No. 49/2018 – Central Tax]

Difference b/w Annual Return & GST Audit

Annual Return is nothing but the compilation of data disclosed in GSTR-1, GSTR-3B and GSTR-2A

VS

GST Audit is reconciliation of these compiled data with books of account. GST audit will qualify the difference if any of Annual Return vis-à-vis Books of Account.

While filing of Annual Return and GST Audit for FY 2017-18 the entity is required to consider GSTR-1 and GSTR-3B filed for April 2018 to September 2018 to the extent of amount disclosed pertaining to FY 2017-18. (It is a consolidation of 30 returns filed under GST). It has to note that all the additions , deletions or amendments pertaining to FY 2017-18 is has to be made on or before September 2018.

Applicability of Annual Return : -

SECTION 44 OF THE CGST ACT

Every Registered Person is required to file Annual Return. (Except to the persons mentioned in slide – 4)

It is required to be filed on or before the 31st December of the following the end of such Financial Year.

What information considered for Annual Return: -

Data of

GST Returns for the FY 2017-18.

9 GSTR – 1's & 9 GSTR – 3B's

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Data of

GST Returns for the FY 2018-19 up to September.

6 GSTR – 1's & 6 GSTR – 3B's

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Considered in

Annual Return for the F Y 2017 - 18

Consequences for late filing & Non-filing of Annual Return: -

Late Filing fee:

Which ever is higher (↑)

1) ₹ 100/- per day
2) 0.25 % of turnover

Non - Filing fee:

Notice will be served within 15 days electronically.

Information required to be submitted in Annual Return in GSTR - 9: -

Outward & Inward supplies declared

ITC as declared in returns

Details of tax paid

Transactions of FY 2017-18 declared in returns of April'18 to September'18 or up to annual return whichever is earlier

Other information

A) Details of Outward and inward supplies declared during the Financial Year: -

In this part disclosure of aggregate value of supplies on which GST Liability on outward supplies & inward supplies on which are liable under reverse charge. Along with above supplies where GST is not paid are also to be disclosed. The following are the table's where disclosure to be made:

TABLE - 4

contains transactions where GST is payable (Advances, Inward and Outward)

TABLE - 5

contains transactions where GST is not payable (ZR, Supply to SEZ, Exempt, RCM, Nil rates, Non-GST)

Elaborative information regarding TABLE – 4:

TABLE - 4A	TABLE – 4B	TABLE – 4C	TABLE – 4D	TABLE – 4E
Supplies made to un-registered persons (B2C)	**Supplies made to registered persons (B2B)**	**Zero rated Supplies (Export)**	**Supplies to SEZ on payment of tax**	**Deemed Exports**

TABLE – 4F	TABLE – 4G	TABLE – 4I	TABLE – 4J	TABLE – 4K & 4L
Advance on which tax paid, but invoice not issued	**Inward Supplies on which tax paid in case of RCM**	**Credit Notes for 4B to 4 E above (-)**	**Debit Notes for 4B to 4 E above (+)**	**Supplies/tax declared (+)/ reduced (-) through amendments**

Elaborative information regarding TABLE – 5:

TABLE - 5A	TABLE – 5B	TABLE – 5C	TABLE – 5D	TABLE – 5E
Zero rated supplies (Export) without payment of tax	Supplies to SEZ without payment of tax	Supplies on which tax is paid by recipient in case of RCM	Exempted Supplies	NIL rated supplies
TABLE – 5F	TABLE – 5I	TABLE – 5J	TABLE – 5K	TABLE – 5L
Non-GST Supplies	Credit Notes for 5A to 5F above (-)	Debit Notes for 5A to 5F above (-)	Supplies/ tax declared through amendments (+)	Supplies/ tax reduced through amendments (-)

B) Details of Input Tax Credit (ITC) as declared in GST returns during the Financial Year : -

In this part disclosure of aggregate value of ITC availed on all inward supplies except those on which tax paid on basis of RCM and also includes supply services received from SEZ . The following table's where disclosure to be made:

TABLE - 6

ITC Availed

TABLE - 7

ITC Reversed & Ineligible ITC

TABLE - 8

Other ITC

Elaborative information regarding TABLE – 6:

TABLE - 6A	TABLE – 6B	TABLE – 6C	TABLE – 6D	TABLE – 6E
Total amount of input tax credit availed through Form GSTR - 3B	Inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs)	Inward supplies received from unregistered persons liable to reverse charge (other than B) on which tax is paid & ITC availed	Inward supplies received from registered persons liable to reverse charge (other than B) on which tax is paid and ITC availed	Import of goods (including supplies from SEZs)

TABLE – 6F	TABLE – 6G	TABLE – 6H	TABLE – 6K & L	TABLE – 6M
Import of services (excluding inward supplies from SEZs)	Input Tax credit received from ISD	Amount of ITC reclaimed (other than B) under the provisions of the Act	Transition Credit through TRAN – I & TRAN - II	Any other ITC availed but not specified above

Elaborative information regarding TABLE – 7:

TABLE - 7A	TABLE – 7B	TABLE – 7C	TABLE – 7D
Reversal of input tax credit in the case of non-payment of consideration (As per Rule – 37 of GST)	Reversal of input tax credit as per provisions relating to manner of distributing the credit by ISD (As per Rule – 39 of GST)	Reversal of input tax credit as per provisions relating to eligible tax in respect of inputs or input services credit (As per Rule – 42 of GST)	Reversal of input tax credit as per provisions relating to eligible tax in respect of capital goods credit (As per Rule – 43 of GST)

TABLE – 7E	TABLE – 7F	TABLE – 7G	TABLE – 7H
Reversal of input tax credit for which Input tax credit is not allowed (As per Section – 17(5) of GST)	Reversal of TRAN-I credit	Reversal of TRAN-II credit	Other reversals (specify)

Elaborative information regarding TABLE – 8:

TABLE - 8A	TABLE – 8B	TABLE – 8C	TABLE – 8D	TABLE – 8E
ITC as per GSTR-2A	ITC as per sum total of 6(B) and 6(H)	ITC on inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs) received during 17-18 but availed during April to Sep, 18	Difference [8A-(8B+8C)]	ITC available but not availed (out of 8D)
TABLE – 8F	**TABLE – 8G**	**TABLE – 8H**	**TABLE – 8I**	**TABLE – 8J**
ITC available but ineligible (out of 8D)	IGST paid on import of goods (including supplies from SEZ)	IGST credit availed on import of goods (as per 6(E) above)	Difference (8G - 8H)	ITC available but not availed on import of goods

C) Details of GST paid as declared in GST returns during the Financial Year : -

In this part disclosure of aggregate value of GST paid during the year. The following things to be considered while disclosure to be made in Table - 9:

- Total amount paid
- How much amount is used for offset (both cash paid & credit utilised)
- No new scope for extra paid or payable

D) Details of transactions for the Previous Financial Year declared in April to September of current Financial Year or up to filing of Annual Return whichever is earlier : -

In this part disclosure of details of amendments/ additions to any of the supplies or to ITC for goods/ services received of Previous Financial Year that were furnished in GST returns from April to September of Current Financial Year or in return up to filing of annual return whichever is earlier. The following are the table's where disclosure to be made :

TABLE - 10

Supplies / tax declared through Amendments (+) (net of debit notes)

TABLE - 11

Supplies / tax reduced through Amendments (-) (net of credit notes)

TABLE - 12

Reversal of ITC availed during previous financial year

TABLE - 13

ITC availed for the previous financial year

TABLE - 14

Differential tax paid on account of declaration in 10 & 11

D) Other Information: -

All other information that not covered above will be disclosed in this part. In this taxpayer is required to disclose HSN wise summary of outward supplies as well as inward supplies. The following are the table's where disclosure to be made :

TABLE - 15	TABLE - 16	TABLE - 17	TABLE - 18	TABLE - 19
Refund (Claimed, Sanctioned, Rejected) and Demand	Supplies Received from Composition taxpayer, Deemed supply (Job Work), Goods sent on approval	HSN Wise Summary of outward supplies	HSN Wise Summary of Inward supplies	Late fee payable and paid

Challenges at the time of Filing Annual Return

- A Work of Numerous Re-conciliations;
- Validation of HSN of vendor in addition to Outward Supplies and Inward Supplies;
- Splitting Total ITC into input for input goods, capital goods and input services respectively;
- Splitting of total outward supplies into taxable, exempted, Nil rated and Non-GST supplies respectively;