



**The Institute of Chartered  
Accountants of India**  
(Set up by An Act of Parliament)



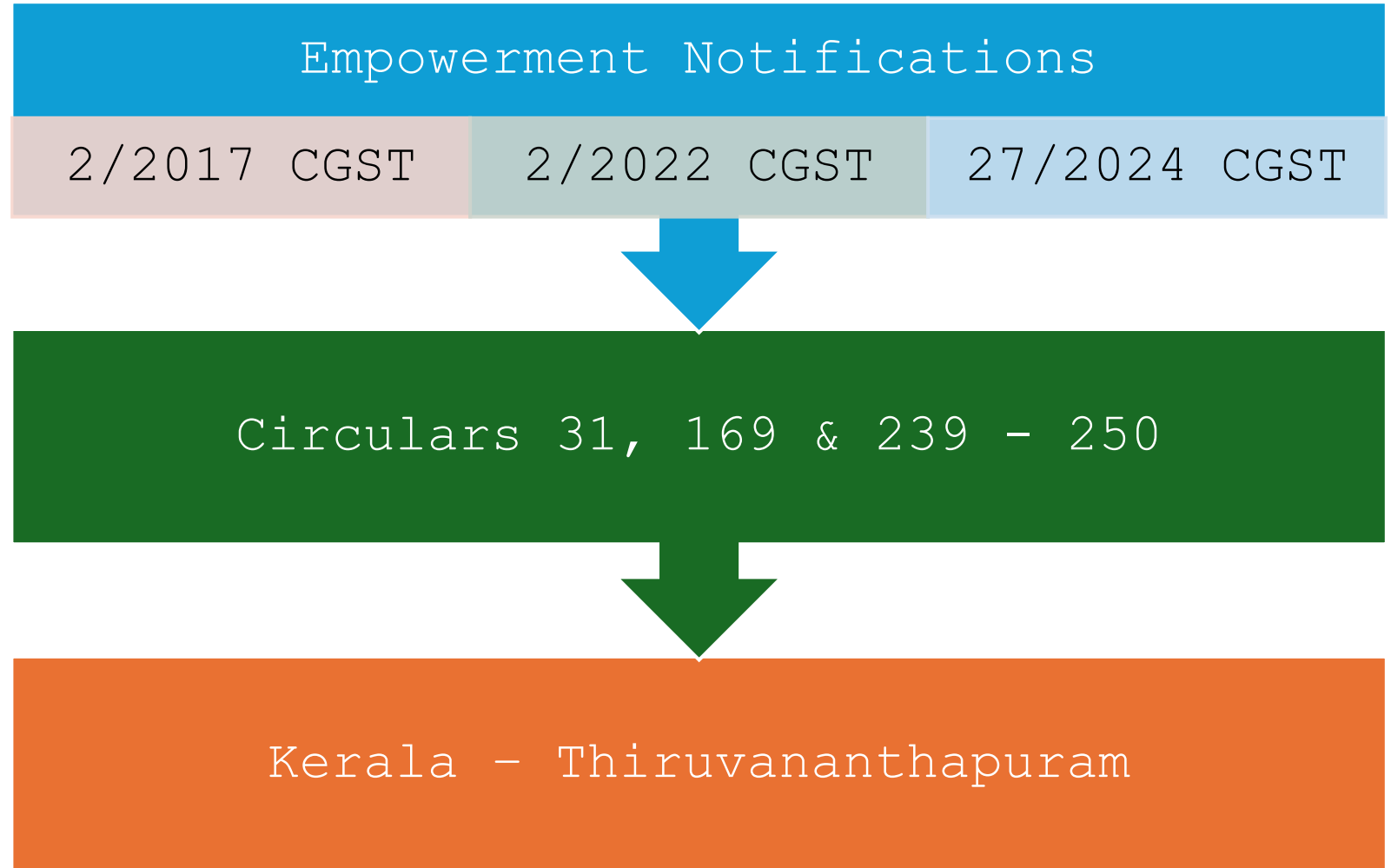
## Two Day National Conference on GST

# GST Latest Amendments & Council Recommendations 2025

**CA Shankara Narayanan V**

GPVS & Associates,  
Chennai & Bengaluru

Multistate  
Adjudication - DGGI



# ITC & ECO

- Circular 240
- ECO u/s 9 (5)
  - Tax on Own Service
  - Tax on Sec 9 (5)
- No ITC for Section 9 (5) output
- No Common ITC reversal for Section 9 (5) output

# ITC on Ex-works

Circular 241

Receipt includes  
Deemed Receipt

EXW - Eligible

Imports ?

# Budget 2025 Vouchers & GST

- Vouchers - Taxability
- Section 12 (4) & 13 (4) omitted

# Vouchers GST

## P2P Vouchers

- No Supply  
– No GST

## Commission

- Service  
Taxable

## Breakage

- Circular  
178
- No GST

# Food



Restaurant with Rooms < 5%  
Rs. 7,500 No ITC



Option from 1<sup>st</sup> April 2025  
Restaurant @ 18%  
With ITC  
But only for "specified premises"



Standalone Restaurants

# Sponsorship RCM



Recipient

- Any Person



Now -  
Recipient

- Any Person  
Other than a  
Body Corporate



# RCM on Renting

Other than Residential Property

Earlier Recipient Registered - Supplier  
Unregistered RCM Applicable

Now - Recipient

- Registered - Composition person
- NO RCM

As-is-Where-is Regularisation - Circular 245

# GSTR-9C – Late Fee



**2017-18 to 2022-23**



**GSTR-9 filed**

Paying Late Fee  
9C filed within 31<sup>st</sup>  
March 2025  
9C Late Fee waived



**Way forward**



To be or Not  
to be

Plant **or**  
Machinery

Plant **&**

Machinery

Capital  
Goods



Depends on  
Books



Plant &  
Machinery –  
Section 17  
(5) (c)

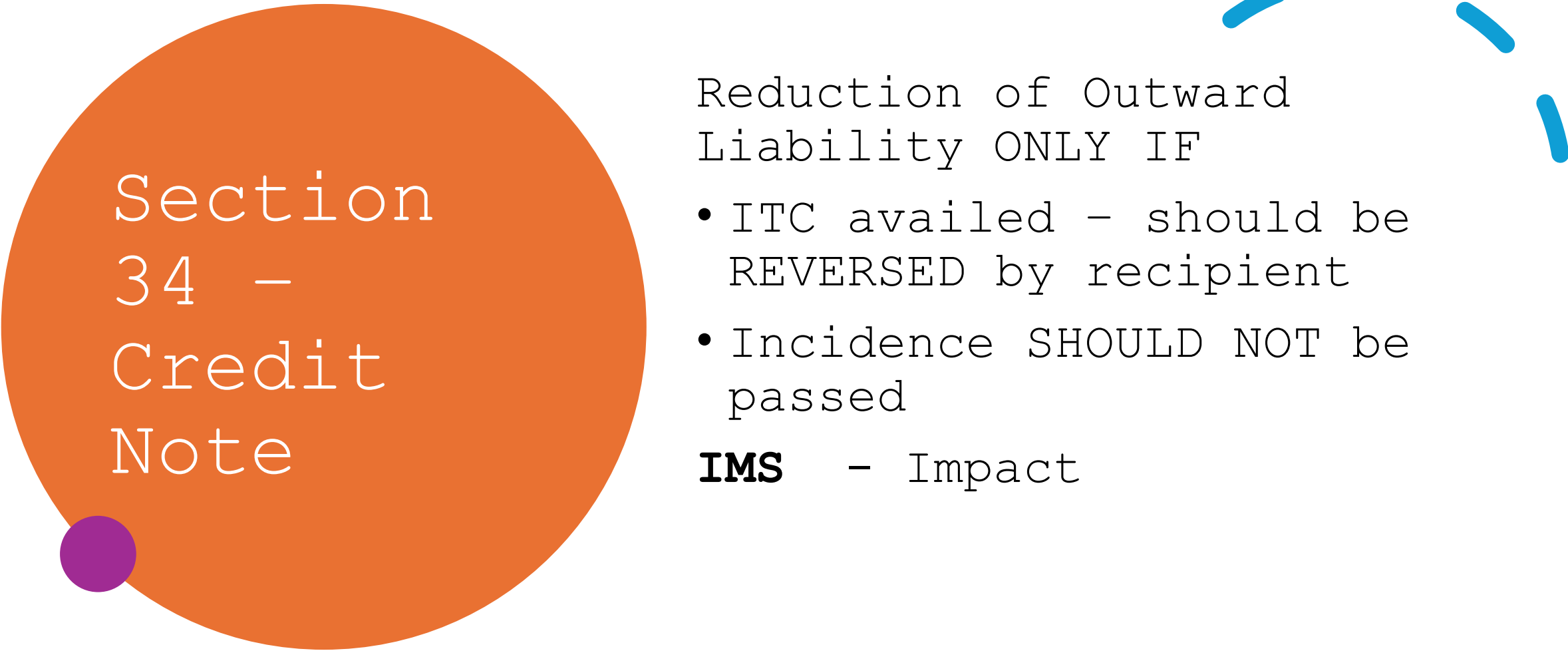


Explanation



Plant or  
Machinery –  
Section 17  
(5) (d)

Explanation 2.--For the purposes of clause (d), it is hereby clarified that **notwithstanding anything to the contrary contained in any judgment, decree or order of any court, tribunal, or other authority, any reference to "plant or machinery"** shall be construed and shall always be deemed to have been construed as a reference to "plant and machinery"



Section  
34 –  
Credit  
Note

Reduction of Outward  
Liability ONLY IF

- ITC availed – should be REVERSED by recipient
- Incidence SHOULD NOT be passed

**IMS** – Impact

Section  
107 –  
Silent yet  
Violent

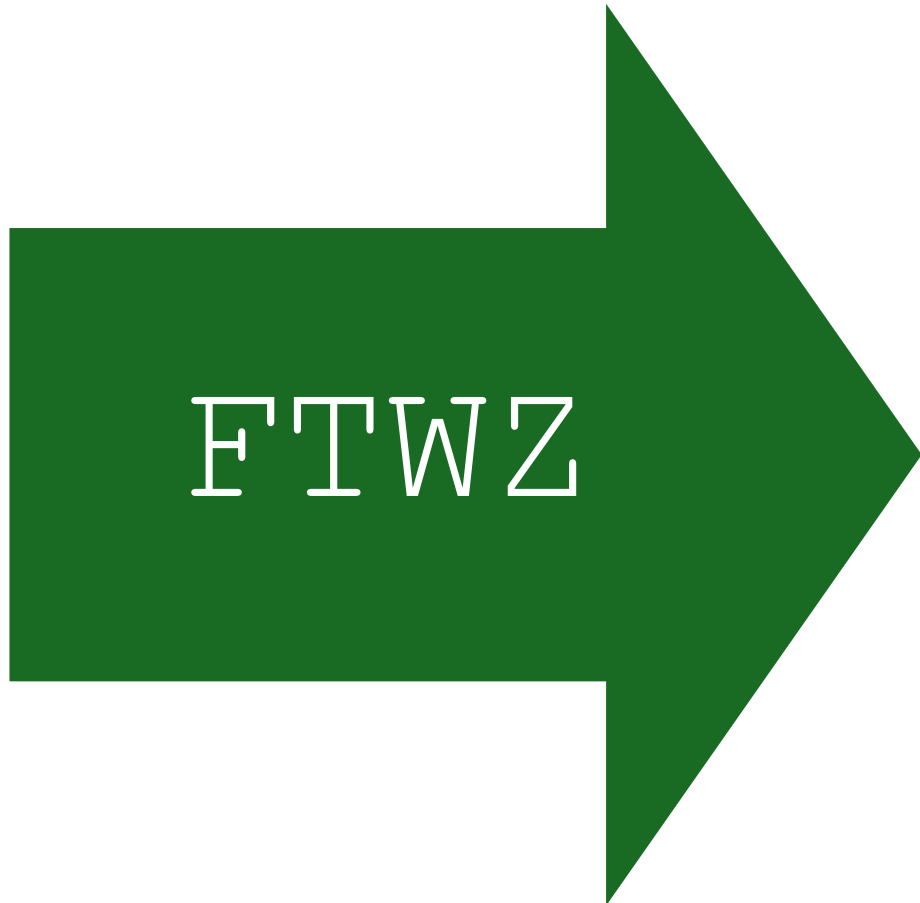
- Appeal
- Penalty only Order
- ANY ORDER
- 10% pre-deposit
- Section 112 (8) –  
similar 10%  
(additional)

# Section 148A – Track & Trace

- Provide System for affixation of UIM
  - E-Storage and access of such Data
  - Prescribe UIM and info to be recorded
  - Persons to be Notified
- Such Notified persons must;
    - Affix
    - Furnish info with time
    - Furnish Machinery details



# Schedule III - Retrospective Amendment



# Section 128A Waiver

Tax paid  
before 1<sup>st</sup>  
November  
2024 thru  
GSTR-3B

- Payment prior to Notice
- Eligible for Waiver

Order  
covering  
Multiple  
Period

- Part of Order eligible for waiver

Self  
Assessed  
Tax - ??

# Merchant Export



Procurement @ 0.1% -  
Notification 40/2017  
CGST



Benefit  
extended to  
Compensation  
Cess 0.1%

12% to 18%



Motor Vehicles



Notification 8/2018



All vehicles MARGIN now  
taxable 18%

ISD -  
Issues

## RCM Payment

- For or on behalf of distinct persons

## HO Kerala

- Multiple Branches TN, KA, GJ & AP
- RCM paid by HO
  - for KA
  - for Kerala

# ISD - Issues

50% ITC -  
Section 17 (4)

Reversal in  
RESPECTIVE State

Distribution in  
full for

- Normal &
- RCM



Thank  
you



## CA Shankara Narayanan V

Partner, GPVS & Associates  
Chennai & Bengaluru

Mobile: +91 96000 89209

E- Mail : shankar@gpvs.co.in



*Disclaimer: The author of this presentation makes no warrant, and expressly disclaim any obligation, that; (a) the information contained therein will be complete, accurate, or up to date; (b) the results obtained from the use of such information will be accurate or reliable; (c) the quality of such information will meet the users expectation's. The author is not responsible or liable for any loss, claim, delay or damages of any kind that may arise out of or in connected with use of such information. The author expressly disclaims for any act or omission, or any consequences of any act or omission by any user relying on information provided in this document or interpretation thereof. © 2025 CA Shankara Narayanan V*