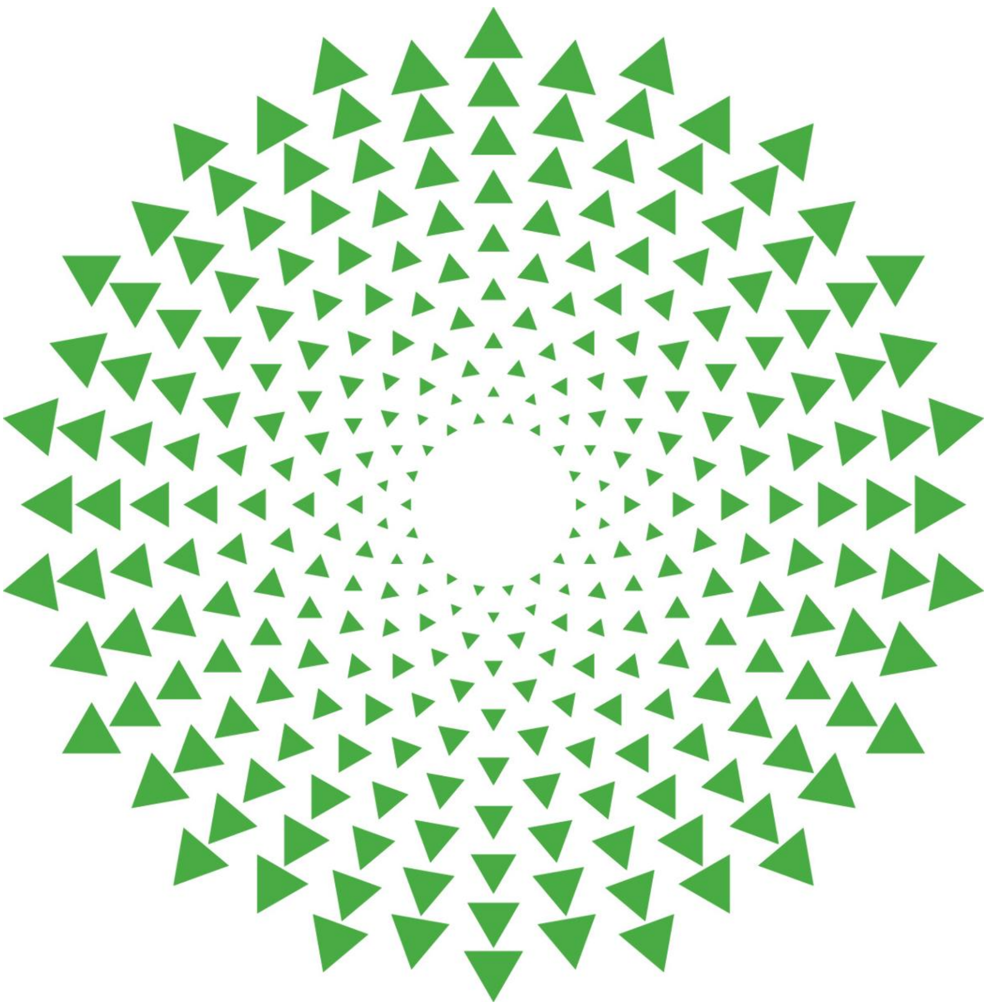

Indirect tax newsletter

Indirect tax updates

May 2026

We are delighted to share a few important judgments/advance rulings passed under the Goods and Services Tax (GST), Central Excise and Service Tax that were available in the public domain for April 2026. This issue also covers some updates from a GST perspective.

GST

M/s Hiveloop Technology Pvt. Ltd. vs. Additional Director, DGGI & Ors. TS-215-HC(KAR)-2026-GST (Karnataka High Court)

The taxpayer (HTPL) operated an e-commerce portal through which B2B transactions for the purchase and sale of goods are undertaken between registered users. It did not collect payments or provide logistics or credit services directly, but empanelled service providers for these optional services. Alternatively, the users could obtain such services from other non-empanelled service providers of their choice. A separate entity, Hiveloop Logistics Private Limited (HLPL), provided logistics and payment services. HLPL entered into agreements with HTPL for licensing technology and empanelment as a service provider. Furthermore, to penetrate the B2B e-commerce market, the taxpayer actively promoted the platform and the services provided therein (i.e., through promotional activities).

The revenue is alleged as follows:

- HTPL failed to collect tax deducted at source ('TCS') at 1% of the net value of taxable supplies made through its platform by other suppliers.
- There is a failure to do Input Tax Credit (ITC) reversal under Section 17(2) of the Central Goods and Services Tax Act, 2017 (CGST Act) for free supplies of "marketing services" (promotional activities) as they are "exempt supplies."
- Section 74 of the CGST Act was invoked as there was fraud, willful misstatement or suppression of facts to evade tax.

The Karnataka High Court held that Section 52 of the CGST Act applies only when the e-commerce operator collects payment for supplies made through its platform. Since the taxpayer did not collect consideration, Section 52 was held inapplicable. The assumption that HLPL's services are attributable to HTPL was deemed erroneous, as HLPL was a separate legal entity. Reference was also made to the Central Board of Indirect Taxes and Customs (CBIC) Circular No.194/06/2023-GST dated 17.07.2023, wherein it has been specifically stated that Section 52 applies only in cases where e-commerce operators collect payment.

The Karnataka High Court further held that HTPL's promotional activities to enhance its platform's usage were not free supplies or exempt supplies. These activities primarily benefited HTPL itself and did not fall under the purview of Section 17(2). Activities undertaken without consideration (and not covered under Schedule I) do not qualify as "supply", and hence, ITC reversal under Section 17(2) is not warranted.

Regarding the invocation of Section 74, it was observed that it could not be invoked, as fraud or willful suppression of facts was not established. It was also observed that the transactions were not supplies of the taxpayer but of independent sellers liable to discharge GST. As the taxpayer was not "the person chargeable with tax", Section 74 could not be invoked. It was noted that the CGST Act does not contain any provision to treat an e-commerce operator as an "assessee in default" for failure to collect TCS, unlike Section 201 of the Income Tax Act, 1968.

Accordingly, the Karnataka High Court quashed the impugned show cause notice and all consequential proceedings.

Tvl. Platinum Marketing vs. Assistant Commissioner (ST) FAC, Chennai (2026) 40 Centax 362 (Mad.) (Madras High Court)

The case involves a taxpayer challenging the imposition of a general penalty under Section 125 of the CGST Act for the delayed filing of annual returns (GSTR-9/GSTR-9C). In the instant case, the taxpayer had already paid a concessional late fee under Notification No. 7/2023-Central Tax, as amended by Notification No. 25/2023-Central Tax, which provided a waiver of the late fee applicable to the delay in filing of annual returns, as prescribed.

The Madras High Court, relying on its earlier decision in the case of Kandan Hardware Mart v. Asstt. Commissioner (ST) (FAC)(2026) 38 Centax 332 (Mad.), held that since the late fee is penal in nature, the imposition of an additional general penalty under Section 125 for the same default is impermissible. Consequently, the Madras High Court quashed the general penalty imposed on the taxpayer.

Golden Traders & Ors. vs. State of Andhra Pradesh & Ors.
TS-205-HC(AP)-2026-GST (Andhra Pradesh High Court)

In this case, the Andhra Pradesh High Court addressed a batch of writ petitions concerning the jurisdiction and powers of officers to intercept, detain and confiscate goods in transit under Sections 129 and 130 of the CGST Act. The reasons for detention included alleged undervaluation, discrepancies in the description/ quantum of goods and absence of invoices or e-way bills in some cases.

The primary issues revolved around the jurisdiction of Andhra Pradesh (AP) state officers to act under the CGST and Integrated Goods and Services Tax (IGST) Acts, particularly for goods in interstate transit that originate and terminate outside AP. Secondly, whether the question of valuation can be taken up for interception, detention and confiscation of goods in transit under Section 129 and 130.

The Andhra Pradesh High Court held that state authorities cannot exercise powers under Sections 129 and 130 in respect of inter-state movement of goods which neither originate nor terminate within the State. It further held that valuation disputes cannot be a ground for detention or confiscation, as such issues must be examined through proper assessment proceedings.

The Andhra Pradesh High Court further held that:

- State officers can act as “proper officers” under the CGST/IGST Act, only where the taxpayer is administratively assigned to them. Furthermore, the officer should have been designated as the “proper officer” by the chief commissioner. The same principle applies vice versa for central officers.
- A “proper officer” appointed under the Andhra Pradesh Goods and Service Tax (‘APGST’) Act, and assigned the functions, under Section 129 and/or 130, of the APGST Act, can discharge such functions, under the CGST Act also, in relation to intra-state sales. However, for inter-state sales, state officers can only act if AP is entitled to a share of the tax under Section 17 of the IGST Act.
- In the event of any discrepancies found in any inter-state movement, it would be open to the state officer to forward the said discrepancies to the proper officer of the consignee, as well as the consignor, to take further action.

- If it is found that the consignment is not accompanied by necessary waybills, it would be open to the state officer to presume that the consignment is an intra-state supply, unless that presumption is rebutted.

Accordingly, the Andhra Pradesh High Court set aside the detention and confiscation proceedings, permitting authorities to forward the matter to the appropriate jurisdictional officers.

Emerson Process Management (India) Pvt Ltd vs Union of India (2026) 41 Centax 207 (Guj.) (Gujarat High Court)

A company amalgamated with the taxpayer company was approved by the National Company Law Tribunal (NCLT). The taxpayer sought to transfer unutilised CGST credit from the transferor company to itself using Form GST ITC-02. However, the GST portal denied the transfer, citing a restriction that both entities must be located in the same state or union territory. The department endorsed this restriction on the ITC-02 form, effectively rejecting the transfer request.

The Gujarat High Court ruled in favour of the taxpayer, holding that neither the CGST Act nor the Central Goods and Services Tax Rules, 2017 (CGST Rules) prohibit the transfer of ITC between entities located in different states, after the scheme of amalgamation has been approved by the NCLT. It was observed that the department cannot incorporate something in a statutory form ITC-02 on the GST Portal that is absent from the statutory provisions.

In reaching its conclusion, the Gujarat High Court relied on the decision of the Bombay High Court in Umicore Autocat India (P.). Ltd. v. UOI (2025) 32 Centax 416 (Bom.), which had allowed inter-state transfer of CGST and IGST in the context of amalgamation scenarios.

The department was directed to accept and process the ITC-02 form manually until the GST portal is updated to accommodate such transfers. In this case, as the transfer was restricted to CGST only, the transfer of ITC under other GST enactments was not addressed in the judgment.

Rollmet LLP vs. Union of India
2026-VIL-377-BOM (Bombay High Court)

The Bombay High Court dealt with a batch of writ petitions challenging the validity of the issuance of a single consolidated show cause notice under Sections 73/74 of the CGST Act by clubbing multiple financial years.

The Bombay High Court noted that although it would be bound by the decision of the coordinate bench in Milroc Good Earth Developers v. UOI 2025-VIL-1081-Bom, significant legal issues raised by the Department require due consideration by a larger bench.

It noted that the provisions do not explicitly restrict the issuance of consolidated notices. The issuance of notice and passing of an order are two independent statutory concepts, and a limitation to pass any order cannot be a limitation on the issuance of a show cause notice. The Bombay High Court noted a divergence in judicial opinions across High Courts. While Milroc's case (supra) and similar cases invalidated consolidated notices, Mathur Polymers v. UOI 2025-VIL-909-DEL and Ambika Traders v. Commr. 2025-VIL-806-DEL upheld their validity.

The Court referred the matter to a larger bench to resolve the following legal questions:

- Whether the operation of Sections 73(1)/74(1) and 73(3)/74(3) is controlled by Sections 73(10)/74(10), thereby prohibiting consolidated notices.
- Whether Sections 73(10)/74(10) explicitly bar consolidated notices for multiple financial years.
- What is the effect of Section 160 of the CGST Act on the proceedings initiated by the proper officer under Section(s) 73/74 of the CGST Act by issuance of a consolidated show cause notice for different periods
- Whether the Milroc decision (supra) correctly interprets the law.
- What is the legal position brought about in the Supreme Court's order in the Mathur Polymers case (supra).

Sona Enterprises vs. State of Andhra Pradesh & Ors. 2026-VIL-415-AP (Andhra Pradesh High Court)

The taxpayer had purchased scrap from Indian Railways, where GST was payable under the Reverse Charge Mechanism (RCM). During the audit for the period 2017–18 and 2018–19, it was found that the taxpayer deposited the GST liability in cash into their Electronic Cash Ledger (ECL) but failed to make the necessary debit entries to appropriate the amounts to the government account. Despite this, the taxpayer availed ITC on the amounts deposited.

The issue for consideration was whether such tax was said to have been paid in time, whether the availment of ITC, on the ground that such tax had been paid, was correct, and the consequences thereupon.

The Andhra Pradesh High Court stated that:

- Mere deposit of cash into the ledger does not constitute payment of tax under the GST framework. Payment occurs only when the amount is appropriated to the government through debit entries. As the taxpayer made the necessary debit entries later, the GST liability was cleared, but interest for the delay was applicable.
- In coming to the above conclusion, the Andhra Pradesh High Court relied upon the judgment of the Jharkhand High Court in the case of RSB Transmission (India) Limited vs. Union of India [2022-VIL-745-JHR], where it was held that mere deposit of cash into the electronic ledger of the taxpayer does not constitute payment of tax. Payment of tax occurs only when the necessary amount is appropriated to the government exchequer through debit entries.
- The taxpayer could not have availed ITC before appropriating the amounts to the government account. However, since the amounts were later debited, the recovery of ITC was not justified.
- Whether it was an inadvertent omission or a case of suppression of fact with the intention of evading tax is a question of fact and needs to be considered by the primary authority, considering the objections of the taxpayer.
- The composite order covering two separate tax periods was defective.

The Andhra Pradesh Court set aside the impugned order and remanded the matter back to the original adjudicating authority for determining whether the delay in debiting the ECL was an inadvertent omission or an act with an intention to evade tax and to pass two separate orders for two tax periods.

Kanika Exports vs. Union of India & Ors.
2026-VIL-379-DEL (Delhi High Court)

The taxpayers had filed refund applications claiming a refund of unutilised ITC on account of export of goods without payment of tax, and a refund of ITC accumulated due to the inverted duty structure. The refunds were rejected by the adjudicating and appellate authorities on the grounds that they were time-barred.

The issue before the Delhi High Court was what would be the "relevant date" from which the two-year period under Section 54 of the CGST Act, which is the limitation period for filing of refund application, is to be calculated. In addition, whether the amendment to Explanation 2(e) under Section 54 of the CGST Act, brought into effect from 1 February 2019, would apply to refund claims pertaining to a period prior to the said amendment but filed after 1 February 2019.

Before the amendment, the relevant date was the end of the financial year in which the refund claim for unutilised ITC arose in both the above cases, per Explanation 2(e) under section 54. Post amendment, i.e., 1 February 2019 onwards, the respective entry was amended and specified the relevant date only in case of inverted duty cases. It provided that the relevant date would be the due date for furnishing the return under Section 39 of the CGST Act for the period in which the claim for refund arises.

The Delhi High Court held that the expression "relevant date" is required to be construed with reference to the category under which the refund claim falls, and in cases of refund of unutilised ITC, the relevant date would be governed by Explanation 2(e). For claims pertaining to the period prior to 1 February 2019, the relevant date would be the end of the financial year in which such a claim for refund arises. The Delhi High Court further held that the amendment to Explanation 2(e) cannot operate retrospectively to take away vested rights and is therefore prospective in nature.

The Delhi High Court set aside the rejection of refund as time-barred and directed processing of the claims on merits in accordance with law.

M/s Karnataka Vikas Grameena Bank vs. Deputy Commissioner of Commercial Taxes & Ors.
2026-VIL-333-KAR (Karnataka High Court)

The taxpayer bank engaged pigmy agents to collect small deposits from customers. The Department issued show-cause notices, alleging that such agents are “business facilitators” and that GST is payable under the reverse charge mechanism on the commissions paid to them. The taxpayer contended that pigmy agents are its employees and the services rendered by them are covered under Section 7(2)(a) read with Schedule III of the CGST Act, which excludes services rendered by an employee to an employer in the course of employment from the definition of “supply.”

The Karnataka High Court referred to the Supreme Court judgement in the case of Indian Banks Association v. Workmen of Syndicate Bank [(2001) 3 SCC 36] wherein it was held that the commission earned by deposit collectors/pigmy agents partakes the character of “wages” under the Industrial Disputes Act, 1947. The Court held that:

- According to the terms of engagement between the bank and the agents, there is complete control over the agents by the bank, maintenance of security deposits, assurance of minimum remuneration, entitlement to benefits such as gratuity, and their disengagement is regulated by notice requirements.
- Their remuneration, though termed as commission, is substantively akin to wages, further evidenced by the deduction of tax at source. In addition, these are not indicators of independent contractor status but hallmarks of employment.
- It is settled that the essence of a relationship is control, supervision and economic dependence, and when these elements coalesce, the relationship assumes the character of employment.
- Furthermore, the court rejected the State’s attempt to classify pigmy agents as “business facilitators” under the Reserve Bank of India (RBI)-regulated business facilitator model.

The Karnataka High Court thus held that the services rendered by pigmy agents are in the course of their employment with the bank and are exempt from GST.

Nivara Infradevelopers LLP vs. Union of India & Ors.
2026-VIL-340-BOM (Bombay High Court)

In this judgement, the Bombay High Court addressed the legality of provisional attachment of bank accounts under Section 83 of the CGST Act, focusing on procedural compliance, abuse of power and the doctrine of proportionality.

In this case, a pre-attachment communication in Form DRC-23 was issued to the taxpayer, and on the same date, a provisional attachment letter in Form DRC-22 was issued to the bankers. The taxpayer submitted a detailed objection to the provisional attachment, outlining the legal requirements and offering alternative security to avoid the attachment. Despite this, the attachment continued to operate. In this background, the taxpayer challenged the attachment orders before the Bombay HC.

The Bombay High Court held that:

- The provisional attachment orders were issued without adherence to the mandatory requirements under Section 83 of the MGST/CGST Act, 2017. No valid opinion was formed by the joint commissioner based on tangible material.
- The pre-intimation notice (Form GST DRC-23) and the attachment orders were issued on the same day, indicating a lack of due process.
- The attachment orders were vague and failed to disclose any opinion or material justifying the necessity of the attachment to protect government revenue.
- The Bombay High Court emphasized that the power to provisionally attach bank accounts is “draconian” and must be exercised strictly in accordance with the law. The failure to follow statutory safeguards rendered the attachment arbitrary and illegal.
- The Bombay High Court granted liberty to the authorities to issue a show cause notice if tangible material exists to justify recovery proceedings.

M/s Yokohama India Private Limited vs. Principal Commissioner of CGST 2026-VIL-645-CESTAT-DEL-ST (Delhi CESTAT)

The taxpayer was audited for a pre-GST period from 1 April 2016 to 30 June 2017 after the implementation of GST. During the audit, it was observed that service tax for the period 2016–17 and 2017–18 (up to June 2017) was either short-paid or unpaid. The taxpayer paid the said amounts along with applicable interest and penalties and thereafter filed a refund application seeking a refund of service tax and Krishi Kalyan Cess paid under RCM under Section 142(3) of the CGST Act, 2017.

Section 142(3) allows cash refund of CENVAT credit, duty, tax, interest or any other amount paid under the existing law for claims filed before or after the appointed day, i.e., 1 July 2017. Such claims shall be disposed of in accordance with the provisions of existing law.

The issue for consideration before the Delhi Tribunal was whether in terms of section 142(3), the taxpayer is eligible for a refund of CENVAT credit of service tax, paid pursuant to audit after the introduction of GST, for the pre-GST period.

The Delhi Tribunal held that the refund claim for CENVAT credit of service tax paid under RCM was allowable under Section 142(3), even if the tax was paid after the introduction of GST. It was observed that merely because the non-payment was identified during an audit and the tax was paid along with penalties did not indicate suppression or fraud. In fact, it reflects the taxpayer's due compliance with the erstwhile provisions. Accordingly, a refund was granted.

M/s Inox Air Products Pvt. Ltd. vs. State Appellate Authority for Advance Ruling (Tamil Nadu)
2026-VIL-13-AAAR (Tamil Nadu AAAR)

The taxpayer acquired leasehold rights for land with existing superstructures from M/s. India Pistons Limited (IPL) for 72 years to set up an Air Separation Unit (ASU) for manufacturing medical and industrial gases. It sought an advance ruling on whether ITC on GST paid for this transaction was admissible. The original ruling by the AAR and a subsequent appeal to the Appellate Authority for Advance Ruling (AAAR) denied ITC, citing restrictions under Section 17(5)(d) of the CGST Act, 2017, as the transaction was for the construction of immovable property on the taxpayer's own account. The Madras High Court remanded the case for reconsideration, focusing on whether the ASU is movable or immovable property and whether it qualifies as plant and machinery.

The core issues for determination in this case and the AAAR findings are as follows:

Sr. no.	Issue	Date AAAR ruling
1	Whether the leasing of land can be said to be a service used 'for construction' under Section 17(5)(d)?	The service received for acquiring leasehold rights was for "construction undertaken 'on own account'" of the ASU, as it enabled the setup of the manufacturing facility. The cost of acquiring leasehold rights was capitalised as part of the ASU.
2	Whether ASU qualifies as movable or immovable property?	The AAAR applied tests of annexation, object, intendment and marketability to determine whether ASP was movable or immovable property. The ASU was deemed immovable property because it was permanently attached to the land for the beneficial enjoyment of the property. The AAAR rejected taxpayer's argument that the ASU was movable, citing its permanent installation and lack of marketability as a standalone unit.

Sr. no.	Issue	Date AAAR ruling
3	Whether the construction is on the taxpayer's own account	The construction was held to be on taxpayer's own account.
4	Whether the ASP can be classified as 'plant and machinery' under the Explanation to Section 17, which would allow ITC despite the restriction	The AAAR held that ASP, as a comprehensive manufacturing facility, did not qualify as "plant and machinery" because the definition covers only apparatus, equipment or machinery fixed to earth by foundation or structural support and used for making outward supplies. The ASP was not an individual apparatus or equipment but a complete manufacturing facility. The AAAR emphasized that the definition excludes land, buildings and civil structures, which were integral to the ASU's setup.

The AAAR distinguished the taxpayer's case from precedents such as Bharti Airtel Ltd. v. CCE [2024-VIL-49-SC-CE and CCE vs. Solid and Correct Engineering Works & Ors. [2010-VIL-24-SC-CE], noting that those cases involved different facts and statutory contexts.

Accordingly, the AAAR upheld that ITC of GST paid on acquisition of leasehold rights is blocked under Section 17(5)(d) of the CGST Act, if such transaction is considered a supply.

Prestige North West Country Owners Associations
2026-VIL-85-AAR (Karnataka AAR)

In this case, the taxpayer, a housing society, collected water charges separately from its members, in addition to maintenance charges. The said charges covered the supply of unprocessed water to its members from borewells, as well as the supply of water procured from third-party vendors. Charges were collected separately based on actual consumption, as determined by monthly individual water-meter readings, and such charges, if added to maintenance charges, would result in certain members exceeding the INR7,500/- per month threshold.

The issue for consideration was regarding the taxability of the separately invoiced water-cost reimbursements.

The authority held that:

- The taxpayer was not selling water as goods but merely recovering the actual cost, which is integrally linked to the service of maintaining the residential complex and its common facilities. Accordingly, Entry 99 of Notification No. 2/2017-CT (Rate) that prescribes a Nil rate for 'water (subject to exceptions)' was not applicable.
- Even if separately invoiced and collected on an actual basis, it forms part of the composite supply of maintenance and related services provided by the taxpayer.
- It must be aggregated with maintenance charges for determining the exemption available for INR7,500/- vide entry 77 of the exemption Notification No. 12/2017-CT (Rate).
- The plea of pure reimbursement was rejected as the applicant does not satisfy the conditions of a "pure agent" under Rule 33 of the CGST Rules.
- The services were classifiable under SAC 999598 (Membership organisation services, including services of Resident Welfare Associations/Home Owner's Associations) and GST would be applicable subject to entry 77 (supra) of the exemption notification.

John Distilleries Pvt. Ltd.
2026-VIL-80-AAR (Karnataka AAR)

The taxpayer, a liquor manufacturer (an activity taxable under the Karnataka Excise Act), sought an advance ruling on whether rebates received from its bank for payment of excise duty through a corporate card are liable to GST. The taxpayer argued that such rebates are financial adjustments and do not constitute consideration for any supply of goods or services.

The Karnataka Authority of Advance Ruling (AAR) held that the rebate granted by HSBC Bank is a post-transaction financial adjustment linked to the use of the corporate card. It merely reduces the applicant's outstanding monetary liability and is not attributable to any independent or identifiable supply of goods or services by the taxpayer to the bank. It qualified as a "transaction in money" outside the scope of "supply" under the GST Law.

It agreed with the taxpayer's reliance placed on the principle laid down by the Supreme Court in the case of Union of India v. Intercontinental Consultants and Technocrats Pvt. Ltd. [2018-VIL-11-SC-ST] that only amounts constituting consideration for a supply can be subjected to tax.

It was also observed that the corporate card arrangement facilitates short-term credit for payment of excise duty, and the rebate operates akin to a discount in respect of such facility, which is otherwise covered under the exemption relating to interest or discount on loans or advances.

Accordingly, it was held that the rebates received from the bank do not constitute consideration for any supply and are merely transactions in money. Therefore, GST would not be applicable.

Notifications/circulars/instructions/advisory

Advisory on difficulty in filing appeals on the GST portal in cases where adjudication orders reflect "NIL" demand due to prior voluntary payment

The Goods and Services Tax Network (GSTN) has issued an advisory addressing issues faced by taxpayers when filing appeals on the GST portal, where adjudication orders reflect "NIL" demand despite an underlying dispute on tax liability.

This situation arises when taxpayers would have made payments at the SCN issuance stage without admitting liability, and the adjudicating authority subsequently issues a demand order treating the payment as a full discharge of the demand without explicitly determining and recording the liability.

As a result, the GST portal records zero liability in the Demand and Collection Register (DCR), restricting the filing of appeals (APL-01) due to errors such as "Disputed amount cannot be more than the demand amount itself."

It is clarified that a payment made during the SCN stage, without an explicit admission of liability, does not constitute acceptance of the demand, and the taxpayer retains the right to file an appeal under Section 107 of the CGST Act. Taxpayers are advised to seek a rectification order reflecting the correct demand amount from the adjudicating authority through the GST portal. Thereafter, the appeal may be filed within the prescribed timelines.

(GST advisory dated 3 April 2026)

Advisory on pre-deposit percentage in the GST portal

The GSTN has issued an advisory on the pre-deposit percentage to be paid while filing appeals in Form APL-01 on the GST portal.

Earlier, the pre-deposit was auto-populated as 10 percent under Section 107(6) of the CGST Act and was non-editable, causing difficulties in cases where pre-deposit had already been made through other means or where the demand amount was incorrectly reflected under the appropriate head. With effect from 6 April 2026, the field has been made editable, allowing taxpayers to modify and pay, as applicable, in their specific case. The correctness of the pre-deposit amount and mode of payment will be verified by the appellate authority during adjudication.
(GST advisory dated 10 April 2026)

Notifications/circulars/instructions/advisory

Advisory on re-computation of interest under Table 5.1 of GSTR-3B

The GSTN has issued an advisory regarding the technical glitch of incorrect computation of interest on the portal for the February 2026 period, without the benefit of the minimum cash balance available in the ECL as per the proviso to Rule 88B(1) of the CGST Rules, which has auto-populated in Table 5.1 of March 2026 GSTR-3B. It highlights that if a taxpayer observes a discrepancy in the system-calculated interest, they can recompute it on the GST Portal.

In such cases, taxpayers may use the “RE-COMPUTE INTEREST” option in Table 5.1, upon which the system recalculates interest based on the latest and updated parameters available in the system and the revised interest amount will then be reflected in the updated system-generated GSTR-3B PDF. Taxpayers should refer to the updated PDF and manually edit the interest in Table 5.1, ensuring that the amount is not less than the recomputed interest appearing in the system-generated GSTR-3B pdf.

(GST advisory dated 16 April 2026)

Advisory on introduction of IMS Offline Tool

The GSTN has issued an advisory on the introduction of an offline Invoice Management System (IMS) tool to facilitate ease of compliance for taxpayers.

The IMS, introduced from the October 2024 tax period, enables taxpayers to take actions on invoices uploaded by suppliers through GSTR-1, GSTR-1A, or IFF, including accept, reject or keep pending. To enhance convenience, an IMF offline tool based on MS Excel has now been introduced, allowing taxpayers to undertake actions on individual and bulk invoices efficiently.

(GST advisory dated 21 April 2026)

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