

GST Trail

April 2025

Key Highlights GST Notifications and Clarification Circulars



www.nexdigm.com



Notification Updates

Instruction No. 03/2025-GST dated 17 April 2025

CBIC issues detailed guidelines for GST registration processing – safeguards for taxpayers clarified.

CBIC has issued Instruction No. 03/2025-GST superseding Instruction No. 03/2023-GST to streamline the processing of applications for GST registration filed in FORM GST REG-01. The move comes in light of multiple complaints regarding delays and arbitrary document demands by field formations, often resulting in the rejection of genuine applications. The instruction outlines uniform guidelines and imposes restrictions on the discretionary practices followed by officers.

Key highlights relevant to taxpayers:

Strict adherence to document list in FORM GST REG-01

Officers are instructed to request only the documents prescribed in FORM GST REG-01. For proof of Principal Place of Business, only one document from the indicative list (e.g., electricity bill, property tax receipt) will suffice. No original physical copies are to be demanded.

April 2025

Clear conditions for rented/shared premises

For rented premises, a valid rent/lease agreement along with any one ownership proof document of the lessor is sufficient. If the agreement is registered, no identity proof of the lessor is required. For shared or consent-based premises, a consent letter with the consenter's identity proof and one ownership document is acceptable. In absence of lease agreements, an affidavit along with possession proof (e.g., electricity bill in applicant's name) is permissible.

No presumptive or irrelevant objections

Officers are directed not to raise presumptive queries such as mismatched business and residential address, prohibited nature of goods in a State, or impracticality of activities from the declared premises. Only queries based on actual deficiencies in the application are allowed.

GST Trail



Defined processing timelines

Applications not flagged as "risky" must be processed within 7 working days. In cases requiring physical verification (due to Aadhaar non-authentication or risk flags), registration is to be granted within 30 days, and the verification report must be uploaded at least 5 days prior to expiry.

Conditions for seeking clarifications (FORM GST REG-03)

Clarification can be sought only for incomplete, illegible, or mismatched documents, or if linked GSTINs have been suspended/cancelled. Officers must obtain approval from a Deputy/Assistant Commissioner before requesting documents not specified in FORM GST REG-01.

Restrictions on application rejections

Applications can be rejected via FORM GST REG-05 only after due examination of replies filed in FORM GST REG-04. Inaction by officers shall not lead to deemed approvals. Grounds for rejection must be recorded in writing.

Oversight and accountability

Supervisory officers are instructed to monitor application processing, prevent deemed approvals, and take strict action against non-compliance with these directions.

Taxpayers facing arbitrary document requests or procedural delays may now seek redressal and contest the same basis said Instruction.



Technical Updates Gross and Net GST revenue collection report for the month of March 2025

The GSTN team has released Gross and Net GST revenue collections for the month of March 2025. Detailed report may be viewed <u>here</u>.

Advisory for Biometric-Based Aadhaar Authentication and Document Verification for GST Registration Applicants of Assam

In accordance with the amended Rule 8 of the CGST Rules, 2017, which provides that an applicant can be identified on the common portal, based on data analysis and risk parameters for Biometric-based Aadhaar Authentication and also provides for taking a photograph of the applicant along with the verification of the original copy of the documents uploaded with the application, the GSTN has developed said functionality . The said functionality has been rolled out in Assam on 1 April 2025. The advisory also outlines the detailed procedure for the document verification and appointment booking process.

Advisory on Case Insensitivity in IRN Generation

The Team GSTN has announced that with effect from 1 June 2025, the IRP (Invoice Reporting Portal) would treat invoice/document numbers as case-insensitive for the purpose of IRN generation. To ensure consistency and avoid duplication, invoice numbers reported in any format (e.g., "abc", "ABC", or "Abc") would be automatically converted to uppercase before IRN generation. This change aligns with the treatment of invoice numbers in GSTR-1, which already treats them as case-insensitive.

Advisory on reporting values in Table 3.2 of GSTR-3B

The Team GSTN has announced that with effect from the April 2025 tax period, Table 3.2 of GSTR-3B (inter-state supplies to unregistered persons, composition taxpayers, and UIN holders) will be auto-populated and non-editable. Any corrections must be made through GSTR-1, GSTR-1A (before filing GSTR-3B), or IFF in subsequent periods. Taxpayers are advised to ensure accurate reporting in these forms to avoid discrepancies in GSTR-3B.



About Nexdigm

Nexdigm is a privately held, independent global organization that helps companies across geographies meet the needs of a dynamic business environment. Our focus on problem-solving, supported by our multifunctional expertise, enables us to deliver customized solutions tailored for our clients.

We provide integrated, digitally-driven solutions encompassing Business and Professional Services across industries, helping companies address challenges at all stages of their business lifecycle. Through our direct operations in the USA, Poland, the UAE, and India, we serve a diverse range of client base, spanning multinationals, listed companies, privately-owned companies, and family-owned businesses from over 50 countries. By combining strategic insight with hands-on execution, we help businesses not only develop and optimize strategies but also implement them effectively. Our collaborative approach ensures that we work alongside our clients as partners, translating plans into tangible outcomes that drive growth and efficiency.

At Nexdigm, quality, data privacy, and confidentiality are fundamental to everything we do. We are ISO/IEC 27001 certified for information security and ISO 9001 certified for quality management. Additionally, we comply with GDPR and uphold stringent data protection standards through our Personal Information Management System, implemented under the BS 10012:2017 Standard.

We have been recognized over the years by global organizations, including the Everest Group Peak Matrix® Assessment, International Tax Review, World Commerce and Contracting, ISG Provider Lens [®] Quadrant Report, International Accounting Bulletin, Avasant RadarView [®] Market Assessment, and Global Sourcing Association (GSA) UK.

Nexdigm resonates with our plunge into a new paradigm of business; it is our commitment to *Think Next*.

Follow us on



USA • Canada • Poland • UAE • India • Japan



www.nexdigm.com

Reach out to us at ThinkNext@nexdigm.com

Disclaimer

This alert contains general information which is provided on an "as is" basis without warranties of any kind, express or implied and is not intended to address any particular situation. The information contained herein June not be comprehensive and should not be construed as specific advice or opinion. This alert should not be substituted for any professional advice or service, and it should not be acted or relied upon or used as a basis for any decision or action that June affect you or your business. It is also expressly clarified that this alert is not intended to be a form of solicitation or invitation or advertisement to create any adviser-client relationship.

Whilst every effort has been made to ensure the accuracy of the information contained in this alert, the same cannot be guaranteed. We accept no liability or responsibility to any person for any loss or damage incurred by relying on the information contained in this alert.

© 2025 Nexdigm. All rights reserved.