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EDITORIAL

Friends,

On 3rd September 2025, the GST Council, in its 56th meeting, approved a sweeping rationalization of GST rates, introducing a simpler two-tier structure (standard and merit rates) and abolishing certain slabs, effective 22nd September 2025. The changes, as per the press release, are aimed at simplifying compliance, making life easier for small traders and businesses, boosting affordability for consumers, and supporting production-intensive sectors including health, agriculture, labour-intensive goods, and key services. The GST rate reductions and rationalisations carry with them an implicit—but very real—obligation that the benefits of lowered tax rates must be passed on to end consumers.

Although the statutory anti-profiteering mechanism under Section 171 of the Central Goods and Services Tax Act, 2017 has by earlier notifications ceased to accept new cases or investigations from 1st April 2025, with the National Anti-Profiteering Authority (NAA) being effectively discontinued for new complaints, the government has made clear through multiple channels that industry is expected to abide by principles of fair pricing in light of the rate change.

Now, businesses will need to carefully review pricing of existing inventory, ensure correct revised MRPs, retain original packaging or labelling till stock is cleared, keep documentary records of how the revised MRPs were arrived at, notify all stakeholders (dealers, retailers), and conform to the advertising / notice requirements. Non-compliance could invite consumer complaints, regulatory action under Legal Metrology / Consumer Protection Acts, and reputational risk.

In this context, the Ministry of Consumer Affairs, Food & Public Distribution issued a communication dated 9th September 2025 under the Legal Metrology (Packaged Commodities) Rules, 2011, which provides relief to manufacturers, packers and importers of pre-packaged goods that have unsold stock produced or packaged (or imported) prior to the GST rate revisions. The notification permits such businesses to declare a revised Maximum Retail Price (MRP) on unsold stock to reflect the new tax rate, in addition to the existing MRP. The relief is time-limited: the revised MRP may be used until 31 December 2025 or until the unsold stock is exhausted, whichever is earlier. The Consumer Affairs communication also prescribes conditions for such price revision.

For the pharmaceutical sector also, the National Pharmaceutical Pricing Authority (NPPA)'s role remains relevant, especially for formulations under the Drugs (Prices Control) Order (DPCO). NPPA has, in earlier instances of GST rate changes, issued guidance directing that reductions in the tax component should reflect in the ceiling prices of drugs under its jurisdiction, and that manufacturers revise their MRPs accordingly to ensure that consumers benefit. With the new GST rationalisation, while NPPA's statutory powers under DPCO pertain to ceiling prices rather than the packaging-MRP component per se, the historical precedents and recent communications from NPPA serve as strong signals to industry that non-passing of GST benefits may attract regulatory and consumer scrutiny.

It is also worth noting that various industry stakeholders have raised concerns over transition challenges: unsold stock printed under old GST slabs, input tax credits on raw materials or packaging procured under the earlier rate, cost of restickering or relabelling, and lack of refund for such inputs in certain cases. The government's notifications try to ameliorate some of these challenges through the time window till 31 December 2025, but careful planning will be needed to ensure that costs are managed and consumer-benefit is demonstrably passed on. In particular, tax professionals must help clients quantify the differential, ensure that accounting and inventory systems reflect the changed rates, and ensure that any revision in MRP is supported by corresponding cost / tax differential calculations.

In conclusion, the rate rationalisation announced by the GST Council on 3rd September 2025, in combination with the communication by the Ministry of Consumer Affairs of 9th September 2025, constitutes a strong message to industry: benefit of GST rate reductions must reach the consumer, and existing stocks must be adjusted to reflect new rates within prescribed procedural and time constraints. Although the formal anti-profiteering mechanism may not be active in its original form, the regulatory, legal, and consumer environment now expects compliance. Business needs to ensure that implementation is swift, transparent, documented and defensible.

Just to reiterate that we remain available over telecom or e-mail.

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SYNOPSIS

TAX CALENDAR

Date	Form/Return/Challan	Reporting Period	Description
20th September	GSTR-3B	Aug-25	Summary return of outward supplies and input tax credit claimed, along with payment of tax by a registered person with aggregate turnover exceeding INR 5 Crores during the preceding financial year or any registered person who has opted to file monthly return.
20th September	GSTR-5A	Aug-25	Summary of monthly outward taxable supplies and tax payable by a person supplying OIDAR services.
14th September	Issue of TDS Certificate	Jul-25	Due date for issue of TDS Certificate for tax deducted under section 194-IA, 194-IB, 194M, 194S in the month of July, 2025
15th September	Form 24G	Aug-25	Due date for furnishing of Form 24G by an office of the Government where TDS/TCS for the month of August, 2025 has been paid without the production of a challan
15th September	Advance tax	AY:2025-26	Second instalment of advance tax for the assessment year 2026-2027.
15th September	Form no.3BB	Aug-25	Due date for furnishing statement in Form no. 3BB by a stock exchange in respect of transactions in which client codes been modified after registering in the system for the month of August, 2025

INCOME TAX

CASE LAW

SRI JAHAR MATILAL VERSUS THE COMMISSIONER OF INCOME TAX, KOLKATA – XVIII & ANR: CALCUTTA HIGH COURT

OUR COMMENTS: In the instance case Disallowing the bad debts on the ground that it was only a provision. It has been held that the plain language of Section 36(1)(vii) of the Act the debt cannot be allowed as bad debt and even though the assessee is stated to have committed an inadvertent mistake, the same cannot be gone into as there is no equity in tax matters and therefore held that making a provision is not the same as written off as bad debt irrecoverable. In the preceding paragraph we have noted the factual position and we find the assessee had actually written off the bad debts during the year and this has been vividly reflected in the balance sheet as at 31.3.2005, which has not been properly appreciated by the fact finding authorities.

If an assessee debits an amount of doubtful debt to the profit and loss account and credits the asset account like sundry debtor's account, it would constitute a write off of an actual debt. If an assessee debits provision for doubtful debt to the profit and loss account and makes a corresponding credit to the `current liabilities and provision' on the liabilities side of the balance sheet then it would constitute a provision for doubtful debts.

Hon'ble Supreme Court in Southern Technologies [2010] - SUPREME COURT] has pointed that Section 41(4) of the Act lays down that, where a deduction has been allowed in respect of a bad debt or a part thereof u/s 36(1)(vii) of the Act, then, if the amount subsequently recovered on any such debt is greater than the difference between the debt and amount so allowed, the excess shall be deemed to be profit and gains of business and accordingly, chargeable to income tax as income of the previous year in which it was recovered and therefore, AO is sufficiently empowered to tax such subsequent repayments u/s 41(4) of the Act.

We find from the profit and loss account for the year ended 31.3.2005, the assesse has shown the bad debts which were written off and subsequently recovered which was greater than the debt payable and on the said component tax has been paid by the assessee.

Tribunal committed an error in affirming the orders passed by the AO as well as the CIT(A). Appeal is allowed.

[For further details please refer the Case Law.]

CIRCULAR

CLARIFICATION ON VARIOUS DOUBTS RELATED TO TREATMENT OF SECONDARY OR POST-SALE DISCOUNTS UNDER GST

OUR COMMENTS: GST Policy Wing of Central Board of Indirect Taxes and Customs has issued Circular No. 251/08/2025-GST dated 12.09.2025 to issue Clarification on various doubts related to treatment of secondary or post-sale discounts under GST. Representations have been received seeking clarifications in respect of tax treatment in cases of secondary discounts or post-sale discount.

2. The matter has been examined. In order to ensure uniformity in the implementation of the law across the field formations, the Board, in exercise of its powers conferred under sub-section (1) of section 168 of the Central Goods and Services Tax Act, 2017 (hereinafter referred to as "the CGST Act") clarifies the issues as under.

S. No.	Issue	Clarification
1.	Whether the full input tax credit is available to the recipient of supply when the recipients make discounted payments to the supplier of goods on account of financial/ commercial credit notes issued by the said supplier?	1. Section 16 (1) of the CGST Act, 2017 provides that every registered person shall be entitled to take credit of input tax charged on any supply of goods or services or both, which are used or intended to be used in the course or furtherance of his business. 2. It has been clarified vide circular No. 92/11/2019-GST dated 7th March 2019 that the supplier of goods can issue financial/ commercial credit notes and in such cases, he will not be eligible to reduce his original tax liability. As the transaction value is not allowed to be reduced on account of issuance of financial/ commercial credit note, accordingly the tax charged from the recipient would also not get reduced. 3. Thus, it is clarified that the recipient will not be required to reverse the Input Tax Credit attributed to the discount provided on the basis of financial/ commercial Credit notes issued by the supplier, as there is no reduction in the original transaction value of the supply and accordingly the corresponding tax liability would also not get reduced.
2.	Whether a post-sale discount offered by a manufacturer to its dealer/ distributor, would be treated as a consideration paid by the manufacturer for the dealer's supply of the same goods to the end customer as a monetary value of the inducement to supply of goods manufactured by him to the end customer?	1. Section 2 (31) of the CGST Act, 2017 defines consideration as to include the monetary value of any act for the inducement of the supply of goods or services, whether by the recipient or by any other person. 2. In cases where there is no agreement between the manufacturer and the end customer, there are two independent sale transactions, one from the manufacturer to the dealer and the other from the dealer to the end customer. The essence of the matter is that in a contract of sale, the sale is completed on the transfer of title to the goods to the buyer. Once this happens, the buyer becomes the owner of the goods, and the seller has no vestige of the title or claims therein. The dealer takes ownership of the goods

		purchased from the manufacturer and subsequently sells them to the end customer and transaction between the manufacturers to dealer operates on a principal-to-principal basis. These discounts are simply given for competitive pricing to push sales and merely reduce the sale price of the goods and are not linked to any independent activity rendered to the manufacturer. Therefore, it is clarified that such a discount cannot be included in consideration as the monetary value of the inducement of further supply of these goods. 3. However, in cases where the manufacturer has some agreement with an end customer to supply goods at a discounted price, the manufacturer may issue commercial or financial credit notes to the dealer, enabling such dealer to provide the goods at the agreed discounted rate to the end consumer. Therefore, it is clarified that such a post-sale discount, given by the manufacturer to the dealer for supplying goods to the end customer at a discounted rate, should be included in the overall consideration as it is an inducement towards the supply of goods by the dealer to the end customer.	3.	Whether a post-sale discount extended by the manufacturer to the dealer can be treated as a consideration in lieu of the activities performed to promote the sale of the goods?	1. The matter has been examined. When dealers receive such post-sale discounts, they may engage in promotional activities to boost sales. However, these activities ultimately enhance the sale of goods that the dealers themselves own, thereby increasing their own revenue. In this context, the discount merely reduces the sale price of the goods and is not linked to any independent service rendered to the manufacturer. Therefore, it is clarified that post-sale discounts offered by manufacturers to dealers in such cases shall not be treated as consideration for a separate transaction of supply of services. 2. However, GST would be leviable in cases where a dealer undertakes specific sales promotional activities, such as advertising campaigns, co-branding, customization services, special sales drives, exhibition arrangements, or customer support services, etc., only when such services are explicitly stated in the agreement with a clearly defined consideration payable for such a supply. In such cases, the dealer provides a distinct service to the supplier, and accordingly, GST would be chargeable.

3. It is requested that suitable trade notices may be issued to publicize the contents of this circular.

4. Difficulty if any, in the implementation of this circular may be brought to the notice of the Board.

[For further details please refer the Circular]

ADVISORY

ADVISORY TO FILE PENDING RETURNS BEFORE EXPIRY OF THREE YEARS

OUR COMMENTS: GSTIN vide advisory dated 28.08.2025 advises that, as per the Finance Act,2023 (8 of 2023), dt. 31-03-2023, implemented w.e.f 01-10-2023 vide Notification No. 28/2023 – Central Tax dated 31th July, 2023, the taxpayers shall not be allowed file their GST returns after the expiry of a period of three years from the due date of furnishing the said return under Section 37 (Outward Supply), Section 39 (payment of liability), Section 44 (Annual Return) and Section 52 (Tax Collected at Source). These Sections cover GSTR-1, GSR-1A, GSTR 3B, GSTR-4, GSTR-5, GSTR-5A, GSTR-6, GSTR 7, GSTR 8 and GSTR 9 or 9C.

Hence, above mentioned returns will be barred for filing after expiry of three years. The said restriction will be implemented on the GST portal from September 2025 Tax period. Which means any return for which due date was three years back or more and hasn't been filed till September Tax period will be barred from Filling. In this regard an advisory was already issued by GSTN on 29th October, 2024

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

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

Hence, the taxpayers are once again advised to reconcile their records and file their GST Returns as soon as possible if not filed till now.

[For further details please refer the Advisory.]

FEMA

CASE LAW

M/S HARISH FOREX SERVICES PVT. LIMITED, AND OTHERS VERSUS ASSISTANT DIRECTOR OF ENFORCEMENT, ADJUDICATING AUTHORITY, DIRECTORATE OF ENFORCEMENT, ASSISTANT DIRECTOR OF ENFORCEMENT, COMPLAINANT AND INVESTIGATING AUTHORITY, DIRECTORATE OF ENFORCEMENT: RAJASTHAN HIGH COURT

OUR COMMENTS: In the instance case Power of search and seizure conferred on the Directorate of Enforcement as per FEMA - validity of seizure/confiscation made by the respondents - seeking a direction to return/release the money, currency illegally confiscated/seized –

It has been held that The provisions of Section 132B of the Income Tax Act, 1961 inter alia provides for application of seized and requisitioned assets which provides that the assets seized may be dealt with in the manner provided therein, whereby, the amount of any existing liability and the amount of liability determined on completion of the assessment may be recovered out of such assets, however, such power is, thereafter, governed by two provisos

A bare look at the first proviso would reveal that on an application made for release of the assets while indicating the source of acquisition of such assets, after adjusting the liability, remaining portion of the assets has to be released. The second proviso indicates that such asset or any portion thereof shall be released within a period of 120 days from the date on which the last of the authorizations for search was executed.

The proviso are not without reason inasmuch as the same have been incorporated only with a view that to ensure that determination of liability has to take place expeditiously and in case the same does not take place the assets have to be released.

In the present case, search took place on 14/3/2019 and despite repeated representations made in the year 2019 and 2020, neither the assets have been released nor the representations have been rejected indicating any reason. Further, even when a show cause notice was issued on 16/10/2020 and a response was filed on 19/3/2021, despite passage of over 02 years and 09 months, no determination has taken place.

So far as the source of acquisition is concerned, as required by the first proviso (supra), a specific submission has been made that the books of account have been seized along with currency and everything is recorded therein and, therefore, the source is very much reflected and available with the respondents.

Thus plea raised by respondents pertaining to attempt to challenge the show cause notice is concerned, the adjudication/determination of the show cause notice is well within the powers of the respondents and none prevented them from determining the same expeditiously, however, the respondents have chosen not to make the determination and continue to sit over the various representations made for release of assets, which action cannot be countenanced.

Respondents despite release of the seized currency are free to make the determination of the show cause notice, qua which no relief has been claimed presently.

Action of the respondents in not releasing the seized assets of the petitioners is essentially in violation of Section 132B of the Act, 1961, which is applicable in terms of Section 37(3) of the FEMA, 1999 and, therefore, the inaction of the respondents in this regard cannot be sustained. Petition is partly allowed. The respondents are directed to pass appropriate orders for release of the seized assets pursuant to the search conducted on 14/3/2019 within a period of four weeks from today.

[For further details please refer the Case Law.]

CUSTOMS

NOTIFICATION

CUSTOMS (FINALISATION OF PROVISIONAL ASSESSMENT) REGULATIONS

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Notification No. 55/2025-Customs (NT) dated 12.09.2025 notified that in exercise of the powers conferred by clause (d) of section 157 read with section 18 and clause (ii) of sub-section (2) of section 158 of the Customs Act, 1962 (52 of 1962), and in supersession of the Customs (Finalisation of Provisional Assessment) Regulations, 2018, except as respects things done or omitted to be done before such supersession, the Central Board of Indirect Taxes and Customs hereby makes the following regulations, namely:-

1. Short title and commencement. –

(1) These regulations may be called the Customs (Finalisation of Provisional Assessment) Regulations, 2025.

(2) They shall come into force on the date of their publication in the Official Gazette.

2. Definitions. – (1) In these regulations, unless the context otherwise requires, –

(a) 'Act' means the Customs Act, 1962 (52 of 1962);

(b) 'date of assent of the Finance Act, 2025, shall mean the 29th day of March, of 2025;

(c) 'documents or information' shall include the result of chemical or other test.

(2) Words and expressions used herein and not defined in these regulations but defined in the Act shall have the same meanings respectively assigned to them in the Act.

3. Application. – (1) These regulations shall apply to any provisional assessment -

(a) pending as on the date of enforcement of these regulations; or

(b) assessed provisionally after the enforcement of these regulations.

Explanation.- For the purposes of these regulations, each bill of entry or shipping bill, as the case may be, that has been assessed provisionally shall be treated as a separate case of provisional assessment.

4. Time-limit and manner of submission of documents or information for the purpose of finalisation of provisional assessment. – (1) Where duty leviable on imported or export goods is assessed provisionally by the proper officer for the reasons that, the necessary documents have not been produced or information has not been furnished by the importer or the exporter at the time of provisional assessment, then the proper officer shall within fifteen days from the date of such assessment, inform the importer or the exporter, in writing, the specific details of the information to be furnished or the documents to be produced.

(2) Where any document or information is sought by the proper officer, then such information or documents shall be made available by the importer or the exporter within two months from the date of such requisition by the proper officer.

Provided that the proper officer may, for reasons to be recorded in writing, allow a further period not exceeding two months, on his own or at the request of the importer or the exporter, in case the documents or information are not made available within the specified time of two months.

Provided further that the an officer to whom the proper officer is subordinate, may allow an additional time period as deemed fit, for reasons to be recorded in writing, on request of the importer or the exporter regarding his inability to provide those documents or information as requested by the proper officer.

Provided also that no extension in time under this regulation may be allowed by an officer to whom the proper officer is subordinate beyond fourteen months from the date of provisional assessment.

(3) On submission of all the documents or information under sub-regulation (2), the importer or the exporter shall inform the proper officer in writing that he has submitted all the documents or information to be furnished or requisitioned.

Provided that where the documents or information required to be furnished by the importer or the exporter, as the case may be, or requisitioned by the proper officer are not made available within the time allowed under sub-regulation (2), the proper officer shall proceed to finalise the provisional assessment on the basis of documents or information as available on the record.

5. Time-limit to conclude enquiry for the purpose of finalisation of provisional assessment.- (1) Where duty leviable on the imported or export goods is assessed provisionally by the proper officer for the reason that the

proper officer deems it necessary to make further enquiry then the officer of customs shall complete the enquiry and transfer the relevant documents along with the report in writing to the proper officer for finalization of assessment, within fourteen months from the date of provisional assessment.

(2) Where any document or information is required during the enquiry, the proper officer may seek such details within the time prescribed under regulation 2.

6. Time-limit and manner of submission of documents or information for the purpose of finalisation of provisional assessment pending as on the 29th March, 2025.-

Where duty leviable on imported or export goods is assessed provisionally by the proper officer for the reasons as per sub-section (1) of section 18 the Act and is pending for finalisation as on the 29th March, 2025, then time-limit for submission of documents or conclusion of enquiry under regulations 4 or 5, as the case may be, shall be reckoned from such date.

7. Payment of duty of own ascertainment before finalisation of provisional assessment:- Importer or exporter, may pay any amount electronically against the bill of entry or shipping bill, as the case may be, on his own ascertainment, during the pendency of the provisional assessment, which shall be adjusted against the duty finally assessed or reassessed, as the case may be.

Provided that importer or exporter is also liable to pay interest, on the above amount so paid voluntarily, consequent to the final assessment order or re-assessment order under sub-section (2) in terms of sub-section 3 of the section 18 of the Act.

8. Time-limit for finalisation of provisional assessment. – (1) The proper officer shall finalise the duty provisionally assessed, where it is possible to do so, within three months of –

(a) receipt of documents or information from the importer or the exporter or on the expiry of the time for submission in accordance with regulation 4 of these regulations; or

(b) conclusion of enquiry in accordance with regulation 5 of these regulations, where the duty leviable was assessed provisionally for that reason.

Provided that any officer to whom the proper officer is subordinate may allow, for reasons to be recorded in writing, a further time period of two months at a time, in case the proper officer is not able to finalise the provisional assessment within the period of three months as specified in sub-regulation (1).

Provided further that the assessment shall be finalised within two years from the date of the provisional assessment under sub-section (1) of section 18 of the Act.

Provided also that for provisional assessment pending under sub-section (1) of section 18 of the Act, as on the 29th March, 2025, the said period of two years shall be reckoned from such date.

(2) Where the proper officer is unable to assess the duty finally within the time specified under sub-regulation (1), for the reason that –

(a) an information is being sought from an authority outside India through a legal process; or

(b) an appeal in a similar matter of the same person or any other person is pending before the Appellate Tribunal or the High Court or the Supreme Court; or

(c) an interim order of stay has been issued by the Appellate Tribunal or the High Court or the Supreme Court;

or

(d) the Board has, in a similar matter, issued specific direction or order to keep such matter pending; or

(e) the importer or exporter has a pending application before the Settlement Commission or the Interim Board,

the proper officer shall inform the importer or exporter concerned, the reason for non-finalisation of the provisional assessment and in such case, time of two years for finalisation of assessment done provisionally, specified under sub-regulation (1), shall apply not from the date of provisional assessment but from the date when such reason ceases to exist.

9. Manner of finalisation of provisional assessment. – (1) The provisional assessment shall be finalised as provided under of section 18 of the Act.

(2) Where the final assessment is contrary to the provisional assessment, the proper officer shall pass a speaking order following principles of natural justice.

(3) Where the final assessment confirms the provisional assessment, the proper officer shall finalise the same after

ascertaining the acceptance of such finalisation from the importer or the exporter on record and inform the importer or exporter in writing of the date of such finalisation.

(4) Where the importer or exporter is to pay the deficiency of the amount finally assessed or re-assessed, as the case may be, after adjustment of the amount already paid, the bill of entry or the shipping bill may be returned for payment of the amount.

Provided that importer or exporter is also liable to pay interest, on the above amount so paid, consequent to the final assessment order or re-assessment order as provided under sub-section (2), of section 18 of the Act.

10. Manner of closure subsequent to the finalisation of provisional assessment.- (1) On finalisation of Assessment done provisionally under regulation 9, where -

(a) the final assessment has confirmed the provisional assessment; or

(b) the duty along with the interest has been paid in full, in case of home consumption or exportation, where the bill of entry or shipping bill has been returned for payment; or

(c) the importer has executed appropriate bond binding himself in relation to the excess duty, in case of warehoused goods,

the Bond executed at the time of provisional assessment with security, if any, shall be cancelled or recredited, as the case may be, and the security shall also be returned, if there are no pending dues.

(2) Where the duty, interest, fine, penalty or any other sum due has not been paid for more than ninety days, which is due to be paid after the finalisation of the assessment under sub-section (2) of section of 18 of the Act and the sum due has attained finality for recovery, then the sum due which remains unpaid shall be adjusted from the security, if any, obtained at the time of provisional assessment, or shall be recovered as the sum due, including the amount of interest to the Central Government by the proper officer in accordance with the provisions of section 142 of the Act, under intimation to the importer or the exporter.

(3) Where the importer or exporter is entitled to a refund, after the finalisation of provisional assessment, the refund shall be processed in terms of sub-sections (4) and (5) of section 18 of the Act.

11. Extension of time-limit for provisional assessment.- Notwithstanding the time-limit provided in regulations 4, 5, 6 or 7, the Commissioner of Customs may, on sufficient cause being shown and reasons to be recorded in writing, extend the period of two years for finalisation of provisional assessment by an additional time of one year in terms of the first proviso to sub-section 1B of section 18 of the Act.

12. Penalty. - The importer or exporter or his authorised representative or Customs Broker who contravenes any of the provisions of these regulations or abets such contravention, or fails to comply with any provisions of these regulations, shall be liable to a penalty to an extent of the amount provided under clause (ii) of sub-section (2) of section 158 of the Act, without prejudice to any other action which may be taken under the Act, rules or regulations made thereunder or under any other law for the time being in force.

[For further details please refer the Notification.]

NOTIFICATION

Amendment in Notification No. 12/97-Customs (N.T.) dated the 2nd April, 1997

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Notification No. 54/2025-Customs (NT) dated 10.09.2025 notified that in exercise of the powers conferred by clause (aa) of sub-section (1) read with sub-section (2) of section 7 of the Customs Act, 1962 (52 of 1962), the Central Board of Indirect Taxes and Customs hereby makes the following further amendment in the notification of the Government of India in the Ministry of Finance (Department of Revenue) No. 12/97-Customs (N.T.) dated the 2nd April, 1997, published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i) vide number G.S.R. 193 (E), dated the 2nd April, 1997, namely:-

In the said notification in the Table, against serial number 12 relating to the State of Uttar Pradesh, in column (3) and (4), after item (xiv) in column (3) and the entries relating thereto in column (4), the following item and entries shall be inserted, namely: -

(1)	(2)	(3)	(4)
		"(xv) Dalpatpur, Moradabad	Unloading of imported goods and the loading of export goods or any class of such goods."

[For further details please refer the Notification.]

CUSTOMS

NOTIFICATION

Fixation of Tariff Value of Edible Oils, Brass Scrap, Areca Nut, Gold and Silver

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Notification No. 53/2025-Customs (NT) dated 08.09.2025 notified that in exercise of the powers conferred by sub-section (2) of section 14 of the Customs Act, 1962 (52 of 1962), the Central Board of Indirect Taxes & Customs, being satisfied that it is necessary and expedient to do so, hereby makes the following amendments in the notification of the Government of India in the Ministry of Finance (Department of Revenue), No. 36/2001-Customs (N.T.), dated the 3rd August, 2001, published in the Gazette of India, Extraordinary, Part-II, Section-3, Sub-section (ii), vide number S. O. 748 (E), dated the 3rd August, 2001, namely:-

In the said notification, for TABLE-1, TABLE-2, and TABLE-3 the following Tables shall be substituted, namely: -

"TABLE-1

Sl. No.	Chapter/ heading/ subheading/tariff item	Description of goods	Tariff value (US $Per Metric Tonne)
(1)	(2)	(3)	(4)
1	1511 10 00	Crude Palm Oil	1060 (i.e., no change)
2	1511 90 10	RBD Palm Oil	1066 (i.e., no change)
3	1511 90 90	Others – Palm Oil	1063 (i.e., no change)
4	1511 10 00	Crude Palmolein	1079 (i.e., no change)
5	1511 90 20	RBD Palmolein	1082 (i.e., no change)
6	1511 90 90	Others – Palmolein	1081 (i.e., no change)
7	1507 10 00	Crude Soya bean Oil	1146 (i.e., no change)
8	7404 00 22	Brass Scrap (all grades)	5555 (i.e., no

TABLE-2

Sl. No.	Chapter/ heading/ subheading/tariff item	Description of goods	Tariff value (US $)
(1)	(2)	(3)	(4)
1.	71 or 98	Gold, in any form, in respect of which the benefit of entries at serial number 356 of the Notification No. 50/2017-Customs dated 30.06.2017 is availed	1157 per 10 grams
2.	71 or 98	Silver, in any form, in respect of which the benefit of entries at serial number 357 of the Notification No. 50/2017-Customs dated 30.06.2017 is availed	1257 per kilogram (i.e., no change)
3.	71	(i) Silver, in any form, other than medallions and silver coins having silver content not below 99.9% or semi-manufactured forms of silver falling under sub-heading 7106 92; (ii) Medallions and silver coins having silver content not below 99.9% or semi-manufactured forms of silver falling under sub-heading 7106 92, other than imports of such goods through post, courier or baggage. Explanation. - For the purposes of this entry, silver in any form shall not include foreign currency coins, jewellery made of	1257 per kilogram (i.e., no change)

		silver or articles made of silver.	
4.	71	(i) Gold bars, other than tola bars, bearing manufacturer's or refiner's engraved serial number and weight expressed in metric units; (ii) Gold coins having gold content not below 99.5% and gold findings, other than imports of such goods through post, courier or baggage. Explanation. - For the purposes of this entry, "gold findings" means a small component such as hook, clasp, clamp, pin, catch, screw back used to hold the whole or a part of a piece of Jewellery in place.	1157 per 10 grams

TABLE-3

Sl. No.	Chapter/ heading/ sub-heading/tariff item	Description of goods	Tariff value (US $ Per Metric Ton)
(1)	(2)	(3)	(4)
1	080280	Areca nuts	7463 (i.e., no change)"

2. This notification shall come into force with effect from the 09th day of September, 2025.

[For further details please refer the Notification.]

INSTRUCTION

EXEMPTION FROM QUALITY CONTROL ORDER (QCO) ON IMPORT OF AEROSPACE GRADE HYDROGEN PEROXIDE FOR NON-COMMERCIAL R&D APPLICATION

OUR COMMENTS: The Ministry of Finance, Department of Revenue vide Instruction No. 29/2025-Customs (NT) dated 12.09.2025 notified that in Reference is invited to the O.M. dated 04.09.2025, issued from file No. C-I-43/3/2024-PCPIR-CPC, by the Deputy Secretary (Chemicals), Ministry of Chemicals and Fertilizers, on the above subject (Copy enclosed).

2. It has been informed by the Ministry of Chemicals and Fertilizers that the Indian Standard does not include any categorization or specification for Aerospace Grade Hydrogen Peroxide for space R&D. Accordingly, it has been decided to grant exemption on the import of Aerospace Grade hydrogen for non- commercial R&D applications from Hydrogen Peroxide (Quality Control) Order, 2022.

3. In view of the above, it is requested that necessary action may be taken to sensitize officers under your jurisdiction regarding the said matter.

4. The difficulties, if any, may be brought to the notice of the Board.

[For further details please refer the Instruction.]

DGFT

NOTIFICATION

AMENDMENT IN EXPORT POLICY OF ANIMAL BY-PRODUCTS - 29/2025-26 - FOREIGN TRADE POLICY

OUR COMMENTS: The Ministry of Commerce and Industry vide Public notice No. 29/2025-26 dated 08.09.2025 notified that in exercise of the H powers conferred by Section 3 read with section 5 of Foreign Trade (Development & Regulation) Act, 1992, read with paragraph 1.02 and 2.01 of the Foreign Trade Policy, 2023, as amended from time to time, the Central Government hereby amends export policy for specific ITC (HS) codes under Chapter 23 of Schedule-II (Export Policy), ITC(HS) 2022, with immediate effect, as follows-

1. Policy condition 2 under Chapter 23 of the Schedule-II (Export Policy), ITC(HS) 2022 is inserted as follows -

> Meat, Offal, Guts, Bladders, Stomach, Intestines, Pizzle, Bones, Horn, Hooves, Glands, Hides and other organs (Chapter 02, 05 & 41) used as raw material in the preparation of pet food products (not intended for human consumption) sourced from APEDA registered integrated abattoirs/Municipal Slaughterhouses which have been subjected to post-mortem inspection and segregation to ensure the suitability of the raw material for such purpose by the designated veterinary authority of the state where the meat processing plant is located shall issue the certificate on the basis of inspections carried out by Veterinarians duly registered under Indian Veterinary Council Act, 1984 employed by the slaughtering unit and supervised by the designed veterinary authority of the state/UT.

2. Export Policy of the following ITC(HS) Codes are amended accordingly:

2. Export Policy of the following ITC(HS) Codes are amended accordingly:

ITC(HS) Codes & Description	Existing Export Policy Condition	Revised Export Policy Condition
23091000 --- Dog or cat food, put up for retail sale	Subject to Policy Condition 1 of this Chapter.	Subject to Policy Condition 1 and 2 of this Chapter.
23099010 --- Compounded Animal Feed		
23099020 --- Concentrates for compound animal feed		

Effect of this Notification: Export policy of certain Animal by-products has been revised in line with specific EU Regulations.

[For further details please refer the Notification.]

PUBLIC NOTICE

AMENDMENTS IN PARA 4.53 OF THE HANDBOOK OF PROCEDURES, 2023.

OUR COMMENTS: The Ministry of Commerce and Industry vide Public Notice no. 22/2025-26 dated 09.09.2025 notified that in exercise of powers conferred under Paragraph 1.03 and 2.04 of the Foreign Trade Policy, 2023, as amended from time to time, the Director General of Foreign Trade hereby inserts an additional para as Para 4.53 (e) of the Handbook of Procedures 2023 for the purpose of ease of doing business by providing the correction facility in the online system:

4.53 (e) "An application for such amendments in unutilized and un-transferred DFIAs, which are system-related and corrective in nature, shall be filed in ANF 4G. Any such amendment would require approval of Head of Office."

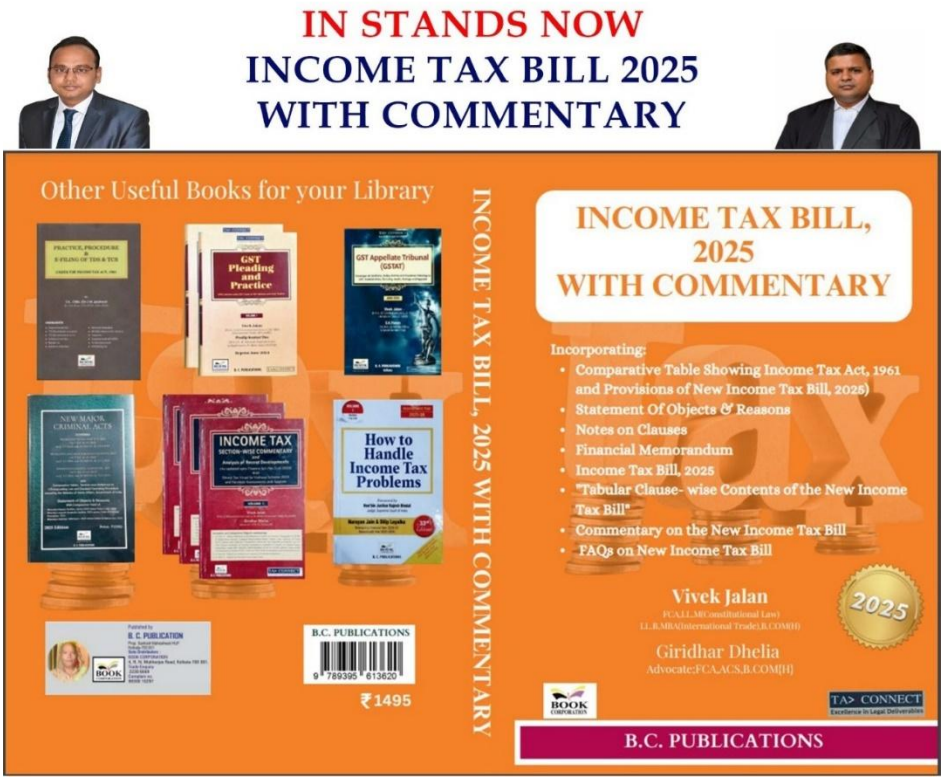
Effect of the Public Notice: Certain amendments are allowed to DFIAs, for ease of doing business. Few illustrative examples are given below:

a) Correction in Unit of Measurement

b) Correction in ITC HS code of import item

c) Correction in value of the import item

[For further details please refer the Public Notice.]



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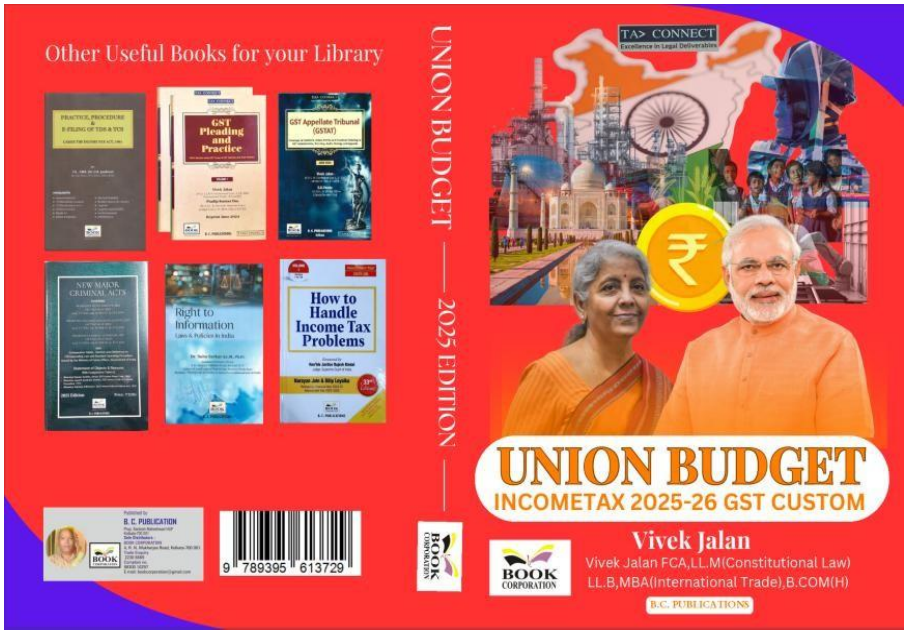

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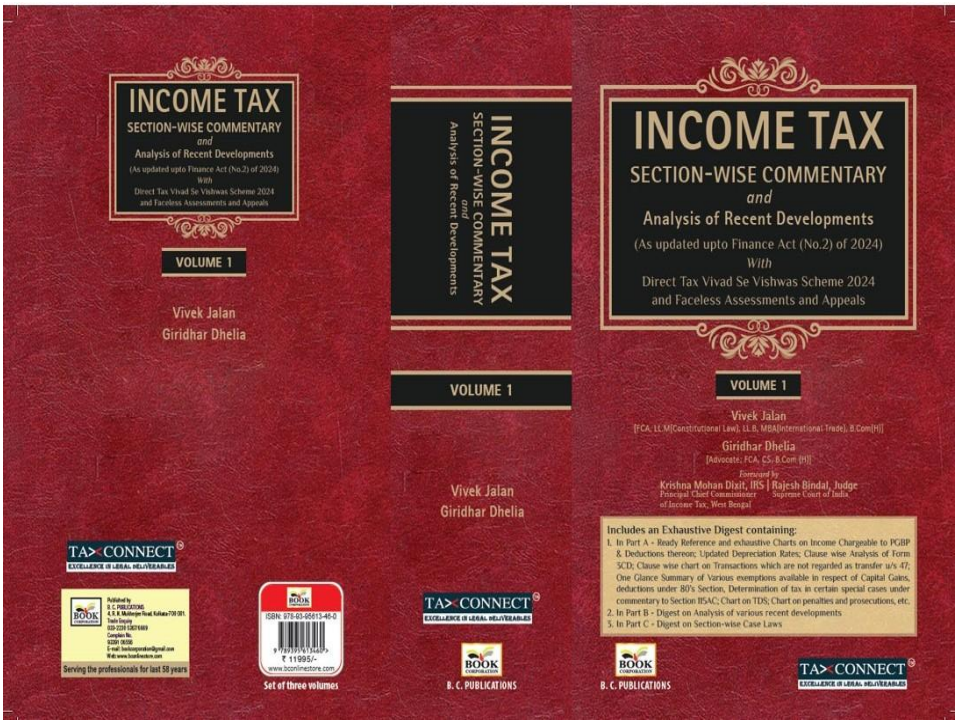

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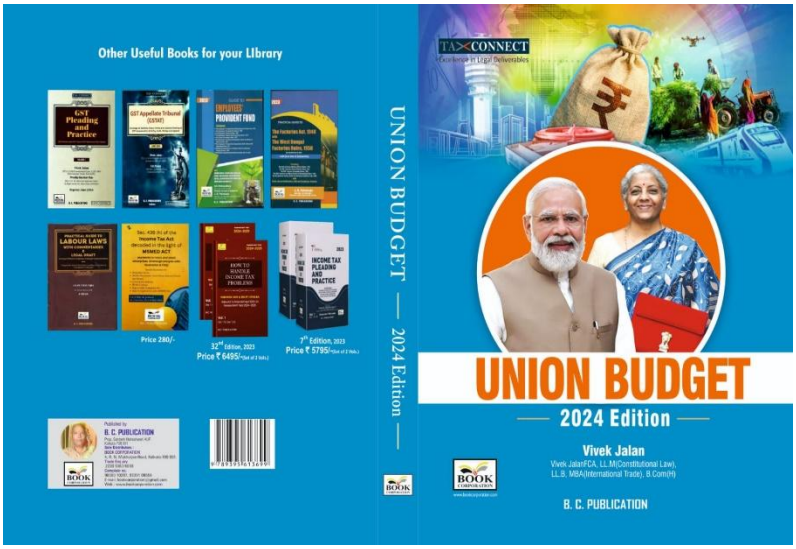

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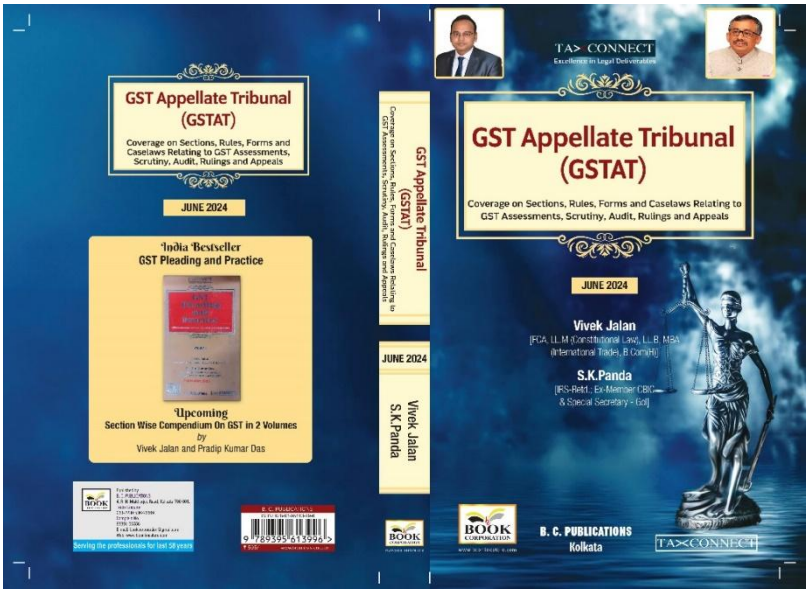

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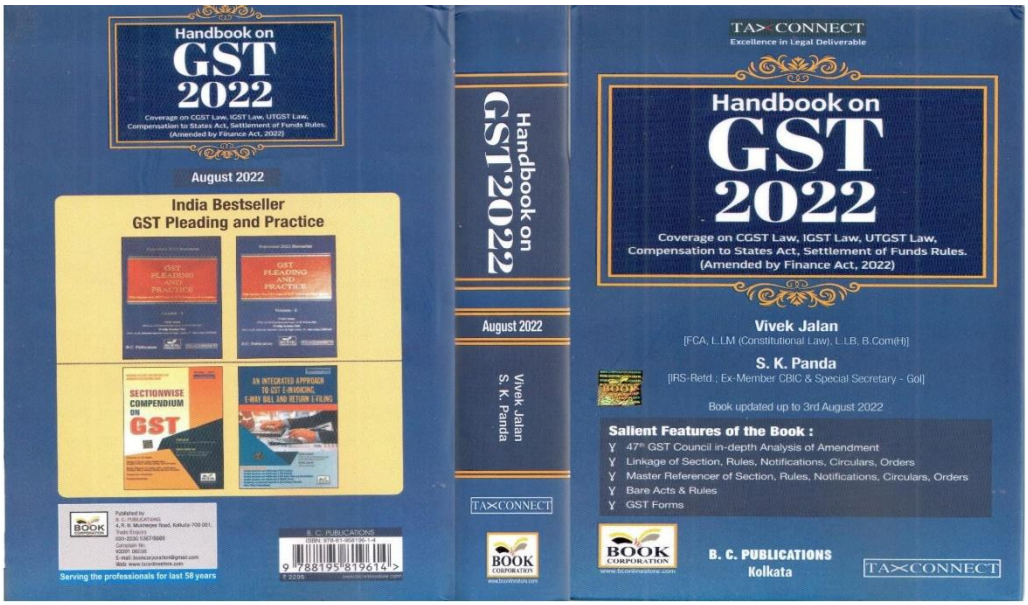

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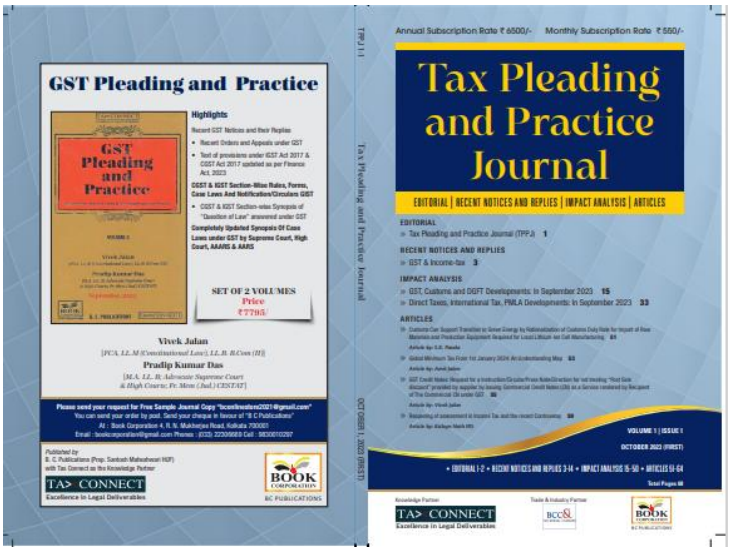

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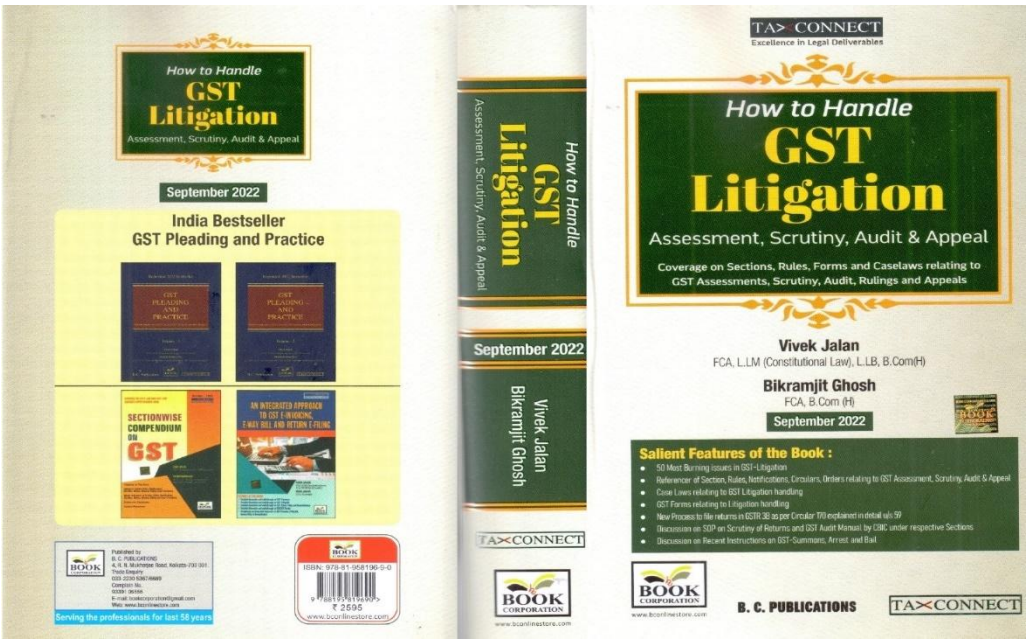

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