

# TAX CONNECT

## Knowledge Partner:



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### TAX CONNECT:

<b>Mumbai</b>	: Unit No. 312, Omega Business Park, Near-Kaamgar Hospital, Road No. 33, Wagle Industrial Estate Thane (West), Maharashtra – 400604
<b>Bengaluru</b>	: 951, 24 <sup>th</sup> Main Road, J P Nagar, Bengaluru, Karnataka – 560078.
<b>Delhi (NCR)</b>	: B-139, 2 <sup>nd</sup> Floor, Transport Nagar, Noida-201301 (U.P)
<b>Kolkata</b>	: 6, Netaji Subhas Road, 3rd Floor, Royal Exchange Building, Kolkata – 700001 - Room No. 119, 1 <sup>st</sup> Floor, “Diamond Arcade” 1/72, Cal Jessore Road, Kolkata – 700055 - Tobacco House, 1, Old Court House St, Radha Bazar, Corner, Kolkata, West Bengal 700001
<b>Dubai</b>	: Azizi Feirouz, 803, 8 <sup>th</sup> Floor, AL Furjan, Opposite Discovery Pavillion, Dubai, UAE
<b>Contact</b>	: <b>+91 7003384915</b>
<b>Website</b>	: <a href="http://www.taxconnect.co.in">www.taxconnect.co.in</a>
<b>Email</b>	: <a href="mailto:info@taxconnect.co.in">info@taxconnect.co.in</a>

## EDITORIAL



### Friends,

The Goods and Services Tax framework has progressively moved towards tighter system controls to ensure that input tax credit (ITC) is availed strictly in accordance with statutory provisions and actual tax incidence. Recent system validations relating to negative balances and excess availment of ITC, including ITC arising under the reverse charge mechanism (RCM), mark a significant shift from post-facto corrections to real-time compliance enforcement.

Under the evolving GST architecture, the system no longer permits the carry forward or utilisation of negative values arising from excess availment of ITC beyond what has been earlier reversed or is currently available. Any attempt to reflect negative balances or to avail ITC in excess of the permissible balance is now automatically restricted. This principle applies equally to regular ITC as well as to ITC pertaining to RCM. Where RCM-related ITC is sought to be availed in excess of the available balance, the system disallows such availment at the return filing stage itself.

A key development in this context is the operationalisation of the Electronic Credit Reversal and Re-claimed Statement (ECRRS). This statement acts as a central reference for tracking excess availment, reversals, and subsequent re-claims of ITC. Where the ECRRS reflects a negative closing balance, taxpayers are mandatorily required to reverse such excess claimed ITC in the current tax period. This reversal must be reported in Table 4(B)(2) of the GSTR-3B for the relevant period. The compliance requirement is uncompromising: if no ITC is available in the current period to effect such reversal, the amount declared in Table 4(B)(2) is automatically added to the taxpayer's output tax liability for that period, thereby necessitating cash payment.

Similar discipline has been introduced for negative balances appearing in the RCM Liability/ITC Statement. In such cases, taxpayers are required to neutralise the negative balance either by paying the additional RCM liability in Table 3.1(d) of GSTR-3B or by correspondingly reducing the ITC claimed under Table

4A(2) or Table 4A(3) in the current return period. This ensures that ITC under RCM is availed only to the extent of tax actually discharged and reflected in the system.

The system has also introduced a filing-level embargo for non-compliance with these requirements. Taxpayers who already have a negative closing balance in the ECRRS or the RCM Liability/ITC Statement are not permitted to file their GSTR-3B unless the prescribed corrective actions are taken. Filing is enabled only after the mandatory reversal of excess ITC is declared in Table 4(B)(2) or the negative RCM balance is regularised through payment or reduction of ITC, as applicable. In situations where current-period ITC is insufficient, the system-driven conversion of such reversal into output liability underscores the cash-flow impact of non-aligned ITC practices.

These measures signal a clear policy intent to eliminate the practice of provisional or excess ITC availment and to enforce strict alignment between returns, statements, and actual tax payments. For taxpayers, this necessitates heightened diligence in monthly reconciliations, particularly between GSTR-3B, ITC statements, ECRRS, and RCM-related data. From a governance perspective, the transition reflects GST's maturation into a compliance ecosystem where system validations play a central role in safeguarding revenue while compelling disciplined tax reporting.

Hence, the disallowance of negative balances and excess ITC availment is not merely a technical adjustment but a structural reform in GST compliance. Taxpayers must adapt by instituting robust internal controls, ensuring timely reversals, and planning cash flows with the understanding that system-driven liabilities can arise where ITC positions are not promptly regularised.

**Just to reiterate, we remain available over telecom or e-mail for any clarifications.**

**Editor:**

**Vivek Jalan**

Partner - Tax Connect Advisory Services LLP

**Co-Editor:**

**Rohit Sharma**

Joint Partner – Tax Connect Advisory Services LLP

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## TAX CALENDAR

Date	Form/Return/Challan	Reporting Period	Description
11th January	<b>GSTR-1</b>	<b>Dec-25</b>	Monthly Statement of Outward Supplies to be furnished by all normal registered taxpayers making outward supplies of goods and services or both and contains details of outward supplies of goods and services.
13th January	<b>GSTR-(IFF)</b>	<b>Dec-25</b>	Details of B2B Supply of a registered person with turnover upto INR 5 Crores during the preceding year and who has opted for quarterly filing of return under QRMP.
13th January	<b>GSTR-1</b>	<b>Oct-Dec 2025</b>	Monthly Statement of Outward Supplies to be furnished by all normal registered taxpayers making outward supplies of goods and services or both and contains details of outward supplies of goods and services.
13th January	<b>GSTR-5</b>	<b>Dec-25</b>	Summary of outward taxable supplies and tax payable by a non-resident taxable person.
13th January	<b>GSTR-6</b>	<b>Dec-25</b>	Details of Input Tax Credit (ITC) received and distributed by an Input Service Distributors (ISD).
14 <sup>th</sup> January	<b>Issue of TDS Certificate</b>	<b>Nov-25</b>	Due date for issue of TDS Certificate for tax deducted under section 194-IA, 194-IB, 194M, 194S in the month of November, 2025
15th January	<b>FORM 24G</b>	<b>Dec-25</b>	Due date for furnishing of Form 24G by an office of the Government where TDS/TCS for the month of December, 2025 has been paid without the production of a challan
15 <sup>th</sup> January	<b>Statement of TCS</b>	<b>Dec-25</b>	Quarterly statement of TCS for the quarter ending December 31, 2025
15 <sup>th</sup> January	<b>FORM 15CC</b>	<b>Oct-Dec2025</b>	Quarterly statement in respect of foreign remittances (to be furnished by authorized dealers) in Form No. 15CC for quarter ending December, 2025
15 <sup>th</sup> January	<b>Form No. 15G/15H</b>	<b>Oct-Dec2025</b>	Due date for uploading declarations received from recipients in Form. 15G/15H during the quarter ending December, 2025
15 <sup>th</sup> January	<b>FORM 49BA</b>	<b>Dec-25</b>	Furnishing of statement in Form No. 49BA under Rule 114AAB (by specified fund) for the quarter ending December 31, 2025

## INCOME TAX

## NOTIFICATION

## CENTRAL GOVERNMENT NOTIFIES THE CORE SETTLEMENT GUARANTEE FUNDS SET UP BY THE AMC REPO CLEARING LIMITED, ASSESSMENT YEAR 2024-25

**OUR COMMENT:** The Central Board of Direct Taxes vide Notification No. 06/2026 dated 08.01.2026 notified that in exercise of the powers conferred by clause (23EE) of section 10 of the Income-tax Act, 1961 (43 of 1961), the Central Government hereby notifies the Core Settlement Guarantee Fund (PAN: AAAJA3150B), set up by AMC Repo Clearing Limited, a recognized clearing corporation, with respect to specified income mentioned in Explanation (iii) of clause (23EE) of section 10 of the Income-tax Act, 1961, for the purpose of the said clause for the assessment year 2024-25 and subsequent assessment years.

2. This notification shall be effective subject to the conditions that Core Settlement Guarantee Fund (PAN: AAAJA3150B) set up by AMC Repo Clearing Limited shall continue to follow conditions mentioned in clause (23EE) of Section 10 including the following-

- shall file return of income in accordance with sub-section (4C) of section 139 of the Income-tax Act, 1961.
- AMC Repo Clearing Limited shall remain recognised as a clearing corporation by SEBI.

[For further details please refer the Notification.]

## NOTIFICATION

## TAX EXEMPTION ON SPECIFIED INCOME OF "GORAKHPUR INDUSTRIAL DEVELOPMENT AUTHORITY" U/S 10(46A) OF INCOME-TAX ACT, 1961

**OUR COMMENT:** The Central Board of Direct Taxes vide Notification No. 05/2026 dated 07.01.2026 notified that in exercise of the powers conferred by sub-clause (b) of clause (46A) of section 10 of the Income-tax Act, 1961 (43 of 1961), (hereinafter referred to as "the Income-tax Act"), the Central Government hereby notifies "Gorakhpur Industrial Development Authority" (PAN: AAALG1185A), (hereinafter referred to as "the assessee"), an authority constituted under the Uttar Pradesh Industrial Area Development Act, 1976 (U.P. Act no.6 of 1976) for the purposes of the said clause.

2. This notification shall be effective from the assessment year 2025-26, subject to the condition that the assessee continues to be an authority constituted under the Uttar Pradesh Industrial Area Development Act, 1976 (U.P. Act no.6 of 1976) with one or more of the purposes specified in sub-clause (a) of clause (46A) of section 10 of the Income-tax Act.

[For further details please refer the Notification.]

## NOTIFICATION

## TAX EXEMPTION ON SPECIFIED INCOME OF "KOTA DEVELOPMENT AUTHORITY" U/S 10(46A) OF INCOME-TAX ACT, 1961

**OUR COMMENT:** The Central Board of Direct Taxes vide Notification No. 04/2026 dated 07.01.2026 notified that in exercise of the powers conferred by sub-clause (b) of clause (46A) of section 10 of the Income-tax Act, 1961 (43 of 1961), (hereinafter referred to as "the Income-tax Act"), the Central Government hereby notifies "Kota Development Authority" (PAN: AAAJK2043D) (hereinafter referred to as "the assessee"), an authority constituted under the Kota Development Authority Act, 2023 (Act No. 31 of 2023) for the purposes of the said clause.

2. This notification shall be effective from the assessment year 2025-26, subject to the condition that the assessee continues to be an authority constituted under the Kota Development Authority Act, 2023 (Act No. 31 of 2023) with one or more of the purposes specified in sub-clause (a) of clause (46A) of section 10 of the Income-tax Act.

[For further details please refer the Notification.]

## NOTIFICATION

## TAX EXEMPTION ON SPECIFIED INCOME OF "MUSSOORIE DEHRADUN DEVELOPMENT AUTHORITY" U/S 10(46A) OF INCOME-TAX ACT, 1961

**OUR COMMENT:** The Central Board of Direct Taxes vide Notification No. 03/2026 dated 06.01.2026 notified that in exercise of the powers conferred by sub-clause (b) of clause (46A) of section 10 of the Income-tax Act, 1961 (43 of 1961), (hereinafter referred to as "the Income-tax Act"), the Central Government hereby notifies "Mussoorie Dehradun Development Authority", (PAN: AAAAM4651Q) (hereinafter referred to as "the assessee"), an authority constituted under the Uttar Pradesh Urban Planning Development Act, 1973 (President's Act 11 of 1973) and as regulated under the Uttarakhand Urban and Country Planning Development (Amendment) Act, 2013, for the purposes of the said clause.

2. This notification shall be effective from the assessment year 2024-25, subject to the condition that the assessee continues to be an authority constituted under the Uttar Pradesh Urban Planning Development Act, 1973 (President's Act 11 of 1973) and as regulated under the Uttarakhand Urban and Country Planning Development (Amendment) Act, 2013 with one or more of the purposes specified in sub-clause (a) of clause (46A) of section 10 of the Income-tax Act.

[For further details please refer the Notification.]

# INCOME TAX

## NOTIFICATION

### TAX EXEMPTION ON SPECIFIED INCOME OF "JOINT ELECTRICITY REGULATORY COMMISSION (FOR THE STATE OF GOA AND UNION TERRITORIES EXCEPT DELHI)" U/S 10(46A) OF INCOME-TAX ACT, 1961

**OUR COMMENT:** The Central Board of Direct Taxes vide Notification No. 02/2026 dated 06.01.2026 notified that in exercise of the powers conferred by sub-clause (b) of clause (46A) of section 10 of the Income-tax Act, 1961 (43 of 1961), (hereinafter referred to as "the Income-tax Act"), the Central Government hereby notifies "Joint Electricity Regulatory Commission (for The State of Goa and Union Territories except Delhi) (PAN: AAAJJ0668D), (hereinafter referred to as "the assessee"), an authority constituted under the Electricity Act, 2003 (No. 36 of 2003) for the purposes of the said clause.

2. This notification shall be effective from the assessment year 2024-25, subject to the condition that the assessee continues to be an authority constituted under the Electricity Act, 2003 (No.36 of 2003) with one or more of the purposes specified in sub-clause (a) of clause (46A) of section 10 of the Income-tax Act.

**[For further details please refer the Notification.]**

## NOTIFICATION

### PENSION FUND, NAMELY, INBAR HOLDING RSC LIMITED SPECIFIED U/S 10(23FE)

**OUR COMMENT:** The Central Board of Direct Taxes vide Notification No. 01/2026 dated 05.01.2026 notified that in exercise of the powers conferred by sub-clause (iv) of clause (c) of the Explanation 1 to clause (23FE) of section 10 of the Income-tax Act, 1961 (43 of 1961) (hereinafter referred to as the "Act"), the Central Government hereby specifies the pension fund, namely, Inbar Holding RSC Limited (PAN: AAGCI2029C), (hereinafter referred to as "the assessee") as the specified person for the purposes of the said clause in respect of the eligible investment made by it in India on or after the date of publication of this notification in the Official Gazette but on or before the 31st day of March, 2030 (hereinafter referred to as "the said investments") subject to the fulfilment of the following conditions, namely:-

- (i) the assessee shall file return of income, for all the relevant previous years falling within the period beginning from the date in which the said investment has been made and ending on the date on which such investment is liquidated, on or before the due date specified for furnishing the return of income under sub-section (1) of section 139 of the Act;
- (ii) the assessee shall intimate the details in respect of each investment made by it in India during the quarter within one month from the end of the quarter in Form No. 10BBB, as per the

provisions of clause (v) of rule 2DB of the Income-tax Rules, 1962;

- (iii) the assessee shall furnish along with such return a certificate in Form No.10BBC in respect of compliance to the provisions of clause (23FE) of section 10 of the Act, during the financial year, from an accountant as defined in the Explanation below sub-section (2) of section 288 of the Act, as per the provisions of clause (vi) of rule 2DB of the Income-tax Rules, 1962;
- (iv) the assessee shall maintain a segmented account of income and expenditure in respect of such investment which qualifies for exemption under clause (23FE) of section 10 of the Act;
- (v) the assessee shall continue to be regulated under the laws of the Government of Abu Dhabi, or the Government of the United Arab Emirates, or both;

(vi) the assessee shall be responsible for administering or investing the assets for meeting the statutory obligations and defined contributions of one or more funds or plans established for providing retirement, social security, employment, disability, death benefits or any similar compensation to the participants or beneficiaries of such funds or plans, as the case may be;

- (vii) the earnings and assets of the assessee should be used only for meeting statutory obligations and defined contributions for participants or beneficiaries of funds or plans referred to in clause (vi) and no portion of the earnings or assets of the pension fund inures any benefit to any other private person; barring any payment made to creditors or depositors for loan or borrowing [as defined in sub-clause (b) of clause (ii) of Explanation 2 to clause (23FE) of section 10 of the Act] taken for the purposes other than for making investment in India;
- (viii) the assessee shall not have any loans or borrowings [as defined in sub-clause (b) of clause (ii) of Explanation 2 to clause (23FE) of section 10 of the Act], directly or indirectly, for the purposes of making investment in India; and
- (ix) the assessee shall not participate in the day-to-day operations of investee [as defined in clause (i) of Explanation 2 to clause (23FE) of section 10 of the Act] but the monitoring mechanism to protect the investment with the investee including the right to appoint directors or executive director shall not be considered as participation in the day-to-day operations of the investee.

2. Violation of any of the conditions as stipulated in the said clause (23FE) of section 10 of the Act and this notification shall render the assessee ineligible for the tax exemption.

3. This notification shall come into force from the date of its publication in the Official Gazette.

**[For further details please refer the Notification.]**

# GST

## ADVISORY

### ADVISORY ON FILING OPT-IN DECLARATION FOR SPECIFIED PREMISES, 2025

**OUR COMMENTS:** GSTIN vide advisory dated 04.01.2026 advises that, the relevant declarations issued vide Notification No. 05/2025 – Central Tax (Rate), dated 16th January 2025, are now made available electronically on the GST Portal. These declarations may be opted for and filed by persons who are applying for registration or are already registered and supplying hotel accommodation services by declaring the premises as “specified premises”.

Kindly take note of the following key points:

#### 1. Who may opt and file the declaration

- Regular taxpayers (active and suspended) supplying hotel accommodation service who want to declare their premises to be a "specified premises"
- Applicants for new GST registration who want to declare their premises to be a "Specified Premises"

The facility is not applicable to composition taxpayers, TDS/TCS taxpayers, SEZ units/developers, casual taxpayers, or cancelled registrations.

#### 2. Types of Declarations

The following declarations are made available on the portal:

1. Annexure VII: Opt-In Declaration for Registered Person – For existing registered taxpayers opting to declare premises as specified premises for a succeeding financial year.

2. Annexure VIII: Opt-In Declaration for Person Applying for Registration – For persons applying for new registration, to declare premises as specified premises from the effective date of registration.

(Annexure IX – Opt-Out Declaration will be made available separately in due course of time.)

#### 3. Timeline for Filing Declarations

##### (A) Existing Registered Taxpayers – Annexure VII

- Can be filed for the subsequent financial year during the specified window: 1st January to 31st March of the preceding financial year.
- For FY 2026-27, Annexure VII can be filed from 01.01.2026 to 31.03.2026.

##### (B) New Registration Applicants – Annexure VIII

- Can be filed within 15 days from the date of generation of ARN of the registration application.
- Filing is allowed irrespective of whether GSTIN has been allotted, provided the application is not rejected.
- After the lapse of 15 days, the opt-in declaration can be filed only when the window for Annexure VII is available, i.e., 1st January to 31st March.
- Taxpayers will not be able to file Annexure VIII if the registration application is rejected, irrespective of the fact that the 15 days have lapsed or not.

#### 4. How to File the Declaration on GST Portal

##### 1. Log in to the GST Portal

##### 2. Navigate to: Services -> Registration -> Declaration for Specified Premises

##### 3. Select the appropriate option:

- o Opt-In Declaration for Specified Premises, or
- o Download Annexure Filed

##### 4. Select eligible premises, fill in the declaration, and submit using EVC.

# GST

On successful submission, an ARN will be generated.

## 5. Important Points to Note

- A maximum of 10 premises can be selected in one declaration. Additional declarations may be filed for remaining premises, if any. However, separate PDFs with reference numbers will be generated for each premise.
- If any premises are left for opt-in, the taxpayer may again file Annexure VII for that premise for the same financial year during the eligible window period.
- Suspended taxpayers are allowed to file the declaration. However, cancelled taxpayers are barred from filing such declarations.
- The option exercised will continue for subsequent financial years unless an opt-out declaration (Annexure IX) is filed within the prescribed time.

## 6. Downloading of Filed Declarations

- Filed Annexures (VII / VIII) can be downloaded from:  
Services -> Registration ->Declaration for Specified Premises -> Download
- Separate reference numbers are generated for each declared premise.

## 7. Email and SMS Intimation

- Confirmation via email and SMS will be sent to all authorised signatories upon successful filing of the declaration.

### Note:

1. For the first year, i.e., FY 2025–26, these declarations were filed manually with the jurisdictional authority. However, since an online filing facility has now been made available, it is requested that such taxpayers shall file Annexure VII for the specified premises again electronically for FY 2026–27 from 1st January 2026 to 31st March 2026.

2. Declaring specified premises for the first time: Such taxpayers are required to file Annexure VII for FY 2026–27 from 1st January 2026 to 31st March 2026.

**[For further details please refer the Advisory]**

## FEMA

## CASE LAW

FOREIGN EXCHANGE MANAGEMENT (GUARANTEES)  
REGULATIONS, 2026. - FEMA 8(R)/2026-RB - FOREIGN EXCHANGE MANAGEMENT

**OUR COMMENTS:** The Foreign Exchange Department, RESERVE BANK OF INDIA, issued notification vide F. No. FEMA 8(R)/2026-RB dated 06.01.2026 and notified that in exercise of the powers conferred by sub-section (2) of Section 6 and sub-section (2) of section 47 of the Foreign Exchange Management Act, 1999 (42 of 1999), and in supersession of Notification No. FEMA 8/2000-RB dated May 3, 2000, except as respects things done or omitted to be done before such supersession, the Reserve Bank of India makes the following regulations namely:

## 1. Short title and Commencement.-

(1) These regulations may be called the Foreign Exchange Management (Guarantees) Regulations, 2026.

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

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

(a) "Act" means the Foreign Exchange Management Act, 1999 (42 of 1999);

(b) "Authorised dealer" means a person authorised as an authorised dealer under sub-section (1) of section 10 of the Act;

(c) "Creditor" means a person to whom the guarantee is given;

(d) "Guarantee" including a "counter-guarantee" means a contract, by whatever name called, to perform the promise, or discharge a debt, obligation or other liability (including a portfolio of debts, obligations or other liabilities), in case of default by the principal debtor;

(e) "International Financial Services Centre" or "IFSC" shall have the same meaning as assigned to it in clause (g) of Section 3 of the International Financial Services Centres Authority, 2019 (50 of 2019);

(f) "Principal debtor" means a person in respect of whose default the guarantee is given;

(g) "Surety" means a person who gives a guarantee.

(2) The words and expressions used but not defined in these regulations shall have the same meanings respectively assigned to them in the Act or rules or regulations made thereunder.

3. Prohibition.- Save as otherwise provided in the Act or rules or regulations or directions issued under the Act or with the general or special permission of the Reserve Bank of India, no person resident in India shall, except in accordance with these regulations, be a party (principal debtor, surety or a creditor) to a guarantee where any of the other parties to the guarantee is a person resident outside India.

4. Exemptions.- Nothing contained in these Regulations shall apply to the following:

a. a guarantee undertaken by a branch of an authorised dealer bank outside India or in an IFSC, unless any of the other parties to the guarantee is a person resident in India.

b. an Irrevocable Payment Commitment (IPC) issued by an authorised dealer in its capacity of a custodian bank, where the principal debtor is a registered Foreign Portfolio Investor and the creditor is an authorised central counterparty in India.

c. a guarantee given in accordance with the Foreign Exchange Management (Overseas Investment) Regulations, 2022.

5. Permission to act as a surety or a principal debtor.- A person resident in India may act as a surety or a principal debtor for a guarantee, subject to conditions that –

(a) the underlying transaction for which the guarantee is being given or arranged is not prohibited under the Act or rules or regulations or directions issued under the Act; and

(b) the surety and the principal debtor are eligible to lend to and borrow from each other, respectively, under the Foreign Exchange Management (Borrowing and Lending) Regulations, 2018, as amended from time to time:

Provided that clause (b) shall not apply to a guarantee –

## FEMA

(i) given by an authorised dealer bank and covered by a counter-guarantee or issued against 100% collateral in the form of a deposit, from a person resident outside India; or

(ii) given by an agent in India of a shipping or airline company incorporated outside India on behalf of such company in connection with its obligation or liability owed to any statutory or Government authority in India; or

(iii) where both the surety and the principal debtor are persons resident in India.

6. Permission to obtain a guarantee as a creditor.- A person resident in India being a creditor may arrange or obtain a guarantee in its favour, subject to the condition that where the principal debtor and surety both are persons resident outside India, the creditor shall ensure that the underlying transaction is not prohibited under the Act, or rules or regulations or directions issued under the Act.

7. Reporting requirements.- (1) Guarantees covered under these regulations shall be reported –

(a) by the surety where he is a person resident in India; or

(b) by the principal debtor who has arranged the guarantee and where the surety is a person resident outside India; or

(c) by the creditor where the surety and the principal debtor both are persons resident outside India or where the creditor has arranged the guarantee.

(2) The person having the obligation to report the guarantee shall report, (a) issuance of guarantee, (b) any subsequent change in guarantee terms, namely - guarantee amount, extension of period or pre-closure, and (c) invocation of guarantee, if any, in the format provided at Annex to these regulations.

(3) Reporting, as provided in sub-regulations (1) and (2), shall be made to an authorised dealer bank on a quarterly basis within fifteen calendar days from the end of the respective quarter for onward submission to the Reserve Bank of India.

(4) An authorised dealer bank shall submit the returns received under this regulation to the Reserve Bank of India in the manner

and format advised for this purpose within thirty calendar days from the end of the respective quarter.

8. Late Submission Fee for delayed reporting.- (1) A person resident in India who does not meet its reporting obligations, as specified under sub-regulation (3) of regulation 7, may do such reporting along with Late Submission Fee or make payment of Late Submission Fee where such reporting has been done with a delay.

(2) The Late Submission Fee shall be ₹ 7500 + 0.025% x A x n, rounded upwards to the nearest hundred, where,

(a) "n" is the number of years of delay in submission, rounded upwards to the nearest month and expressed up to 2 decimal points; and

(b) "A" is the amount involved in the delayed reporting in INR.

Format of Form – GRN can be referred in the notification.

**[For further details please refer the Notification]**

## CUSTOMS

## NOTIFICATION

## SEEKS TO AMEND NOTIFICATION NO. 21/2021-CUSTOMS (ADD), DATED THE 12TH APRIL 2021

**OUR COMMENTS:** The Central Board of Indirect Taxes and Customs, Ministry of Finance, Department of Revenue vide Notification No. 02/2026 Customs(ADD) dated 08.01.2026 Notified that Whereas, the designated authority vide initiation Notification No. 7/16/2025-DGTR dated the 27th September 2025, published in the Gazette of India, Extraordinary, Part I, Section 1, dated the 27th September 2025, has initiated review in terms of sub-section (5) of section 9A of the Customs Tariff Act, 1975 (51 of 1975) (hereinafter referred to as the Customs Tariff Act) read with rule 23 of the Customs Tariff (Identification, Assessment and Collection of Anti-dumping Duty on Dumped Articles and for Determination of Injury) Rules, 1995 (hereinafter referred to as the said rules), in the matter of continuation of anti-dumping duty on imports of "Normal Butanol or NButyl Alcohol" falling under tariff item 2905 13 00 of the First Schedule to the Customs Tariff Act, originating in or exported from European Union, Malaysia, Singapore, South Africa and United States of America, imposed vide notification of the Government of India, in the Ministry of Finance (Department of Revenue) No. 21/2021-Customs (ADD), dated the 12th April 2021, published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i), vide number G.S.R. 260(E), dated the 12th April 2021, and has requested for extension of the said anti-dumping duty in terms of sub-section (5) of section 9A of the Customs Tariff Act.

Now, therefore, in exercise of the powers conferred by sub-sections (1) and (5) of section 9A of the Customs Tariff Act, read with rules 18 and 23 of the said rules, the Central Government hereby makes the following further amendment in the notification of the Government of India, in the Ministry of Finance (Department of Revenue) No. 21/2021-Customs (ADD), dated the 12th April 2021, published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i), vide number G.S.R. 260(E), dated the 12th April 2021, namely:-

In the said notification, after paragraph 2 and before the Explanation, the following paragraph shall be inserted, namely:-

"3. Notwithstanding anything contained in paragraph 2, the anti-dumping duty shall remain in force up to and inclusive of the 12th July, 2026, unless revoked, superseded or amended earlier.".

**[For further details please refer the Notification.]**

## NOTIFICATION

## SEEKS TO CONTINUE IMPOSITION OF ANTI DUMPING DUTY ON IMPORTS OF "FLEXIBLE SLABSTOCK POLYOL OF MOLECULAR WEIGHT 3000-4000" ORIGINATING IN OR EXPORTED FROM SAUDI ARABIA AND UAE

**OUR COMMENTS:** The Central Board of Indirect Taxes and Customs, Ministry of Finance, Department of Revenue vide Notification No. 01/2026 Customs(ADD) dated 02.01.2026 Notified that Whereas, the designated authority vide initiation Notification No. 7/03/2025-DGTR dated 18th March 2025, published in the Gazette of India, Extraordinary, Part I, Section 1, dated the 18th March 2025, has initiated review in terms of sub-section (5) of section 9A of the Customs Tariff Act, 1975 (51 of 1975) (hereinafter referred to as the Customs Tariff Act) read with rule 23 of the Customs Tariff (Identification, Assessment and Collection of Anti-dumping Duty on Dumped Articles and for Determination of Injury) Rules, 1995 (hereinafter referred to as the said rules), in the matter of continuation of anti-dumping duty on imports of "Flexible

Slabstock Polyol of molecular weight 3000-4000" falling under tariff sub heading 3907 29 of the First Schedule to the Customs Tariff Act, originating in or exported from Saudi Arabia and United Arab Emirates, imposed vide notification of the Government of India, in the Ministry of Finance (Department of Revenue) No. 20/2021-Customs (ADD), dated the 5th April 2021, published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i), vide number G.S.R. 251(E), dated the 5th April 2021, and has requested for extension of the said anti-dumping duty in terms of sub-section (5) of section 9A of the Customs Tariff Act.

Now, therefore, in exercise of the powers conferred by sub-sections (1) and (5) of section 9A of the Customs Tariff Act, read with rules 18 and 23 of the said rules, the Central Government hereby makes the following further amendment in the notification of the Government of India, in the Ministry of Finance (Department of Revenue) No. 20/2021-Customs (ADD), dated the 5th April 2021, published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i), vide number G.S.R. 251(E), dated the 5th April 2021, namely:-

In the said notification, after paragraph 2 and before the Explanation, the following paragraph shall be inserted, namely:-

"3. Notwithstanding anything contained in paragraph 2, the anti-dumping duty shall remain in force up to and inclusive of the 17th June, 2026, unless revoked, superseded or amended earlier.".

**[For further details please refer the Notification.]**

# CUSTOMS

## PUBLIC NOTICE

### IMPLEMENTATION OF REVISED STANDARD OPERATING PROCEDURE (SOP) FOR USE OF BODY WORN CAMERAS (BWCs) BY CUSTOMS OFFICERS ENGAGED IN BAGGAGE CLEARANCE AT NSCBI AIRPORT, KOLKATA

**OUR COMMENTS:** The Central Board of Indirect Taxes and Customs, Ministry of Finance, Department of Revenue vide Public Notice No. 01/2026 dated 06.01.2026 Notified that it is hereby brought to the notice of all concerned that, in order to enhance transparency, accountability and professionalism in passenger interface and baggage clearance functions at Netaji Subhas Chandra Bose International Airport, Kolkata, a Revised Standard Operating Procedure (Standing Order No. 01/2026 Dated 06.01.2025) for use of Body Worn Cameras (BWCs) has been prescribed for Customs officers engaged in baggage clearance duties.

i. The officers of Airport Customs are entrusted with enforcement of the provisions of the Customs Act, 1962, Baggage Rules, 2016 (as amended) and other allied Acts. In line with international best practices, technology-driven reforms of Ease of Doing Business (EoDB) initiatives by Government of India and in compliance with CBIC Instruction No. 34/2025-Customs dated 30.12.2025, it has been decided to mandate the use of Body Worn Cameras with audio-video recording facility for uniformed officers having direct passenger interface at NSCBI Airport, Kolkata.

ii. The Revised SOP lays down detailed guidelines regarding deployment, handling, usage, storage, access, monitoring, retention and retrieval of BWC recordings while ensuring protection of privacy and data security. The SOP also prescribes supervisory controls, accountability mechanisms and data retention norms.

iii. As per the SOP, officers deputed for baggage clearance duties shall activate the BWC during passenger interaction and baggage examination proceedings and continue recording until completion of such interaction. The officers shall courteously inform passengers that the interaction is being recorded as part of transparency measures.

iv. The SOP further provides for secure transfer, encrypted storage and controlled access of the recorded data with defined roles for supervisory and vigilance authorities. Tampering, deletion or unauthorized access to BWC recordings is strictly prohibited.

v. In circumstances where BWCs cannot be used due to operational exigencies such as equipment malfunction or

safety concerns, the reasons shall be duly recorded and verified by the supervisory officer in accordance with the SOP.

vi. The Revised SOP shall come into force with immediate effect and shall be followed strictly by all concerned officers. Any operational issues or difficulties faced during implementation shall be reported through proper channel as prescribed.

vii. This Public Notice is issued for information, guidance and strict compliance by all concerned.

This issues with the approval of competent authority.

**[For further details please refer the Public Notice.]**

## PUBLIC NOTICE

### CAUTIONING ADVISORY TO TRADE CONCERNING ALLEGED DEMANDS OF ILLEGAL GRATIFICATION IN THE NAME OF CUSTOMS OFFICERS

**OUR COMMENTS:** The Central Board of Indirect Taxes and Customs, Ministry of Finance, Department of Revenue vide Public Notice No. 01/2026 dated 06.01.2026 Notified that it has been brought to the notice of this office that in certain instances, some Customs Brokers (CHA) and other intermediaries seem to be demanding money from importers/exporters over and above their legitimate service charges, citing alleged demands by Customs Officers for facilitating clearance of goods. Such malpractices not only cause harassment to the trade but also tarnish the image of the Customs Department and impede the Government's efforts towards encouraging voluntary compliance, as this department is striving to uphold its core values such as integrity, judiciousness, impartiality, fairness, objectivity, transparency, uprightness, conscientiousness, promptness and efficiency towards facilitating genuine and transparent trade.

2. All importers, exporters and other members of the trade are hereby informed that Customs Officers are strictly prohibited from demanding or accepting any illegal gratification or favours in any form whatsoever for discharge of their official duties. The Customs Department is committed to providing efficient, transparent and corruption-free services to all stakeholders. Any demand of money by Customs Officers for clearance of goods or for performance of any official function is against the CCS (Conduct) Rules, 1964 and the said act is illegal and punishable under the Prevention of Corruption Act, 1988.

3. The trade is hereby advised not to encourage such corrupt practices by making any payments to Customs Brokers or any intermediaries citing demands by Customs Officers or in the

# CUSTOMS

name of Customs handling charges to any one. Succumbing to such demands not only perpetuates corruption but may also lead to penal consequences for the persons making such payments under the Prevention of Corruption Act, 1988. Importers and exporters are expected to cooperate with the Department in maintaining integrity and transparency in customs clearance processes.

4. Members of the trade are strongly advised not to fall prey to any demands or illegal gratification made by Customs Brokers, intermediaries or any other persons in the name of Customs Officers or in the name of Customs handling charges. Customs Department collect only the statutory duties/cess/fine/penalty/interest etc., as applicable as mandated by the due provisions and only by online mode through Icegate portal.

5. In case any Customs Broker or any other intermediary seek money citing demands by Customs Officers or in the name of Customs handling charges, any demand from Customs officers directly or if any importer/exporter faces any harassment or undue delay in clearance of goods at any Container Freight Station/Port examination areas (with respect to Import/Export examination and clearances) or for performance of any official function in the jurisdiction of Chennai IV (Export) Commissionerate, the same may be immediately reported, along with proper evidence if any, through the email commr4-cuschn@gov.in or through written complaint addressed to the Commissioner of Customs (Export), Custom House, 60 Rajaji Salai, Chennai – 600001. All such complaints will be treated with utmost confidentiality and will be enquired into promptly or will be referred to the relevant Commissionerate of this zone or to the concerned authority for necessary immediate action.

6. This Public Notice is issued in public interest to caution the trade to be more vigil and to ensure transparency, prevent corruption and facilitate legitimate trade. The trade is requested to take note of the above and extend their fullest cooperation in maintaining integrity in customs operations.

**[For further details please refer the Public Notice.]**

## PUBLIC NOTICE

**TRANSSHIPMENT PERMISSION TO M/S FEDEX EXPRESS  
TRANSPORTATION AND SUPPLY CHAIN SERVICES INDIA  
PRIVATE LIMITED,**

**OUR COMMENTS:** The Central Board of Indirect Taxes and Customs, Ministry of Finance, Department of Revenue vide Public Notice No. 26/2025 dated 01.01.2026 Notified that it is notified for information to all concerned that M/s FedEx Express Transportation and Supply Chain Services India Private

Limited, New Courier Terminal, Near IGI Airport, New Delhi - 110037 have sought fresh transhipment permission for transhipment of import goods from New Courier Terminal, Delhi to Air Cargo Ports namely Delhi Cargo, Mumbai, Chennai, Bengaluru, Hyderabad, Ahmedabad, Coimbatore, Jaipur, Trivandrum, Cochin and Kolkata through M/s Air India Limited.

2. Appropriate Transhipment Bond of Rs. 50,00,00,000/- (Rupees Fifty Crore only) executed by M/s Air India Ltd which is valid up to 21.12.2028. An appropriate Transhipment Bond of Rs 20,00,00,000/- (Rupees Twenty Crores only) valid up to 31.12.2028, has been executed by M/s FedEx Express Transportation and Supply Chain Services India Private Limited for compliance of law and procedure relating to transhipment prescribed in Chapter-VIII of Customs Act, 1962, Circular no. 06/2007-Cus dated 02.01.2007, Circular No. 69/99-Cus dated 06.10.1999 and any other Rules, Regulations, Notifications and Instructions issued on the subject from time to time. M/s FedEx Express Transportation and Supply Chain Services India Private Limited has been granted waiver from furnishing Bank Guarantee in terms of Circular No. 33/2016-Cus dated 22.07.2016.

3. The request of M/s FedEx Express Transportation and Supply Chain Services India Private Limited for the said transhipment permission through M/s Air India Ltd has been examined and is granted upto 20.12.2028 as the expiry date of its Bond of carrier M/s Air India Ltd is 21.12.2028, subject to compliance of procedures and conditions stipulated below.

i. The goods sought to be transhipped shall be specifically mentioned in the import manifest or the import report, as the case may be, for transhipment to any customs station. Transhipment of goods not specifically manifested as for transhipment will not be permitted.

ii. On arrival of cargo, the transhipment cargo is to be segregated at custodian's premises.

iii. After unloading of the imported goods under the custom supervision, a segregation report shall be prepared duly signed by the representative of M/s FedEx Express Transportation and Supply Chain Services India Private Limited.

iv. The goods meant for transhipment shall be transferred to the TP godown and a transfer advice as prescribed shall be prepared duly signed by the representative of M/s FedEx Express Transportation and Supply Chain Services India Private Limited.

## CUSTOMS

v. TP godown shall be safely and adequately secured and shall be operated under the supervision of the custom official only and shall be secured with a double lock.

vi. For transshipment of courier shipment, the carrier/console agent is required to file an application for transshipment of courier shipments, consigned to another airport as indicated in HAWB, cargo transfer manifest (CTM) prepared by the carrier/console agent, as the case may be, may itself be treated as application for trans-shipment. Separate CTMs may be prepared destination wise. Such Transshipment should be approved by the proper officer.

vii. Transshipment of goods not specifically manifested for transshipment will not be permitted. The cargo mentioned in the CTM needs to be escorted by the preventive officer from the warehouse of the custodian to the warehouse of receiving carrier/transporter which acknowledges the same. The concerned carrier/transporter warehouse should have double locking arrangements, one Key of which will be with the carrier/transporter and the other with customs, for storage of trans-shipment cargo. No physical examination needs to be conducted, except on specific intelligence, for following trans-shipment and only marks and number of cargo need to be verified.

viii. These transshipment goods shall be X-rayed by an authorized representative in the presence of Customs official.

ix. The receiving carrier/transporter should prepare its cargo manifest and transshipment be allowed under Customs supervision. The value of transshipped cargo should be debited from the transshipment Bond.

x. Customs at destination airport will acknowledge the receipt of the cargo and send back the acknowledgement manifest through the carrier/transporter. The carrier/transporter should produce such acknowledgement at the originating airport within 10 days of trans-shipment. On the basis of such acknowledgement the Trans- shipment Bond would be re-credited.

xi. The bag containing the imported goods to be transshipped should be durable. These packages or individual packages as the case may be, shall be sealed with the custom department seals by the proper officer and in the presence of an accredited representative of the carrier/transporter and M/s FedEx Express Transportation and Supply Chain Services India Private Limited. The bags required for locking and material required for sealing shall be provided by M/s FedEx Express Transportation and Supply Chain Services India Private Limited.

xii. M/s FedEx Express Transportation and Supply Chain Services India Private Limited shall maintain records and registers in respect of transshipment of goods and shall submit them for inspection as and when directed by the proper officer.

xiii. It shall be ensured that import general manifest (containing the details of import goods so carried) duly attested and sealed by the customs shall be carried by carrier/transporter carrying the said goods and handed over to the proper customs authorities at the customs station of destination in India.

xiv. The said goods in safe and intact condition shall be produced to the proper customs authorities at the said customs station and a certificate to that effect issued by the customs authorities shall be submitted to the proper officer, within 15 days or within such extended period as such officer may allow. On production of said certificate, the bond shall stand discharged. In case of failure to produce the certificate, an amount equal to the value, or as the case may be of the market price of imported goods in respect of which the said certificate is not produced shall be paid by custodian.

xv. M/s FedEx Express Transportation and Supply Chain Services India Private Limited and the carrier shall carry out the instructions issued from time to time by the proper officer to ensure safe custody and transportation of imported goods to be transshipped, due arrival of such imported goods at their respective destination and to receive acknowledgements of the proper officer at those destination.

xvi. The permission can be renewed on satisfactory fulfilment of conditions. The permission is liable to be withdrawn at any time.

**[For further details please refer the Public Notice.]**

# DGFT

## NOTIFICATION

### AMENDMENT IN IMPORT POLICY & POLICY CONDITION OF LOW ASH METALLURGICAL COKE UNDER CHAPTER 27 OF ITC (HS), 2022, SCHEDULE-I (IMPORT POLICY)

**OUR COMMENTS:** : The Ministry of Commerce and Industry vide Notification No. 54/2025-26 dated 03.01.2026 notified that in exercise of the powers conferred by Section 3 and Section 5 of the Foreign Trade (Development & Regulation) Act, 1992, read with paragraphs 1.02 and 2.01 of the Foreign Trade Policy, 2023, as amended from time to time, the Central Government hereby amends the Import Policy of Low Ash Metallurgical Coke under Chapter 27 of ITC (HS), 2022, Schedule-I (Import Policy), as under:

2. The Policy Condition No. 8 of Chapter 27 stands deleted.

ITC (HS) Code	Item Description	Existing Import Policy	Existing Policy Condition	Revised Import Policy	Revised Policy Condition
270400 20	Coke and semi-coke of lignite or of peat	Restricted	Subject to Policy Condition No. 08 of Chapter 27.	Free	-
270400 30	Hard coke of coal				
270400 40	Soft coke of coal				
270400 90	Other				

## Effect of this Notification:

Import of Low Ash Metallurgical Coke (having ash content below 18%), including coke fines/coke breeze and ultra-low phosphorous metallurgical coke, falling under ITC (HS) Codes 27040020, 27040030, 27040040 and 27040090, is "Free".

This is issued with the approval of the Minister of Commerce & Industry.

**[For further details please refer the Notification]**

## TRADE NOTICE

### LAUNCH OF COLLATERAL SUPPORT FOR EXPORT CREDIT UNDER EXPORT PROMOTION MISSION (EPM) – NIRYAT PROTSAHAN

**OUR COMMENTS:** The Ministry of Commerce and Industry vide Trade Notice No. 21/2025-26 dated 02.01.2026 notified that The Collateral Support for Export Credit component under the Export Promotion Mission (EPM) – NIRYAT PROTSAHAN is hereby launched with immediate effect. The intervention aims to improve access to formal export credit for Micro, Small and Medium Enterprises (MSMEs), particularly exporters facing constraints in providing collateral security. Under this component, eligible MSME exporters may avail credit guarantee support for export-related working capital loans extended by member lending institutions, in accordance with the notified ceilings and coverage parameters.

## 2. Implementation Framework and Key Benefits for Exporters

# DGFT

The intervention is being operationalised through the Credit Guarantee Fund Trust for Micro and Small Enterprises (CGTMSE) on a pilot basis.

Salient features for exporters include:

- i. Credit guarantee coverage of up to **85% for Micro and Small exporters and 65% for Medium exporters**, subject to notified ceilings;
- ii. Maximum guarantee limit of ₹10 crore per exporter for FY 2025–26;
- iii. Coverage limited to export-linked **working capital credit**;
- iv. Applicability to MSME exporters engaged in merchandise exports under the notified positive list of HSN six-digit tariff lines.

3. The detailed Guidelines for Collateral Support for Export Credit are enclosed at Annexure-I. The positive list of eligible HSN six-digit tariff lines is enclosed at Annexure-II. The list of eligible Member Lending Institutions through which exporters may avail the collateral guarantee support is provided at Annexure-III. The procedure for online filing of intent by eligible MSME exporters on the DGFT portal, including step-by-step application requirements, is enclosed at AnnexureIV.

#### 4. Pilot Roll-out and Stakeholder Consultation

The component is being implemented on a pilot basis to enable early access for exporters and to facilitate stakeholder feedback. In terms of paragraph 1.07A of the Foreign Trade Policy (FTP) 2023, the enclosed Guidelines are also being issued for stakeholder consultation.

Accordingly, all concerned stakeholders are invited to submit comments and suggestions on the draft Guidelines within 30 days from the date of issuance of this Trade Notice at [epmdgft@gov.in](mailto:epmdgft@gov.in).

5. The consultation process shall run concurrently with the pilot implementation. Feedback received from stakeholders, along with operational learnings from the pilot phase, shall be examined in a structured manner. Based on the same, the Guidelines shall be suitably refined and thereafter formalised through appropriate notifications under the FTP/HBP framework.

This Trade Notice is issued with the approval of the Competent Authority.

**[For further details please refer the Trade Notice]**

#### TRADE NOTICE

#### LAUNCH OF INTEREST SUBVENTION FOR PRE- AND POST-SHIPMENT EXPORT CREDIT UNDER EXPORT PROMOTION MISSION – NIRYAT PROTHSAHAN

**OUR COMMENTS:** : The Ministry of Commerce and Industry vide Trade Notice No. 20/2025-26 dated 02.01.2026 notified that “**Launch of Interest Subvention for Pre- and Post-Shipment Export Credit under EXPORT PROMOTION MISSION – NIRYAT PROTHSAHAN** – regarding “

**The Interest Subvention for Pre- and Post- Shipment Export Credit intervention under the EXPORT PROMOTION MISSION – NIRYAT PROTHSAHAN** is hereby launched with immediate effect to facilitate improved access to pre- and post-shipment rupee export credit for MSME exporters by reducing the cost of such credit and provide a rules-based and transparent interest-relief mechanism aimed at enhancing

# DGFT

liquidity for MSME exporters and enabling them to meet working-capital requirements efficiently.

The detailed Guidelines for implementation of Interest Subvention for Pre- and Post- Shipment Export Credit are enclosed in the Annexure-I.

## **2. Implementation Framework and Key Benefits for Exporters**

The intervention is being operationalised through the Reserve Bank of India on a pilot basis.

Salient features for exporters include:

- i. The rate of interest subvention @ 2.75 % per annum will be available on Pre Shipment Rupee Export Credit and Post Shipment Rupee Export Credit for Micro, Small Enterprises, and Medium Enterprises;
- ii. An MSME exporter may receive a maximum subvention benefit of Rs 50 lakh per financial year.
- iii. Support limited to export credit extended by lending institutions in accordance with the Reserve Bank of India's Master Directions on Pre- and Post-Shipment Export Credit;
- iv. Applicability to MSME manufacturer exporters and merchant exporters under the notified positive list of HSN six-digit tariff lines.

3. The detailed Guidelines for Interest Subvention for Pre- and Post- Shipment Export Credit are enclosed at Annexure-I. The positive list of eligible HSN six-digit tariff lines is enclosed at Annexure-II. The procedure for online filing of intent by eligible MSME exporters on the DGFT portal, including step-by-step application requirements, is enclosed at Annexure-III.

## **4. Pilot Roll-out and Stakeholder Consultation**

The component is being implemented on a pilot basis to enable early access for exporters and to facilitate stakeholder feedback. In terms of paragraph 1.07A of the Foreign Trade Policy (FTP) 2023, the enclosed Guidelines are also being issued for stakeholder consultation.

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This Trade Notice is issued with the approval of the Competent Authority.

**[For further details please refer the Trade Notice]**

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#### Author:

**Vivek Jalan**

*[FCA, LL.M (Constitutional Law), LL.B, MBA(International Trade), B.Com(H)]*

**S. K. Panda**

*[IRS-Retd.; Ex-Member CBIC & Special Secretary - GoI]*

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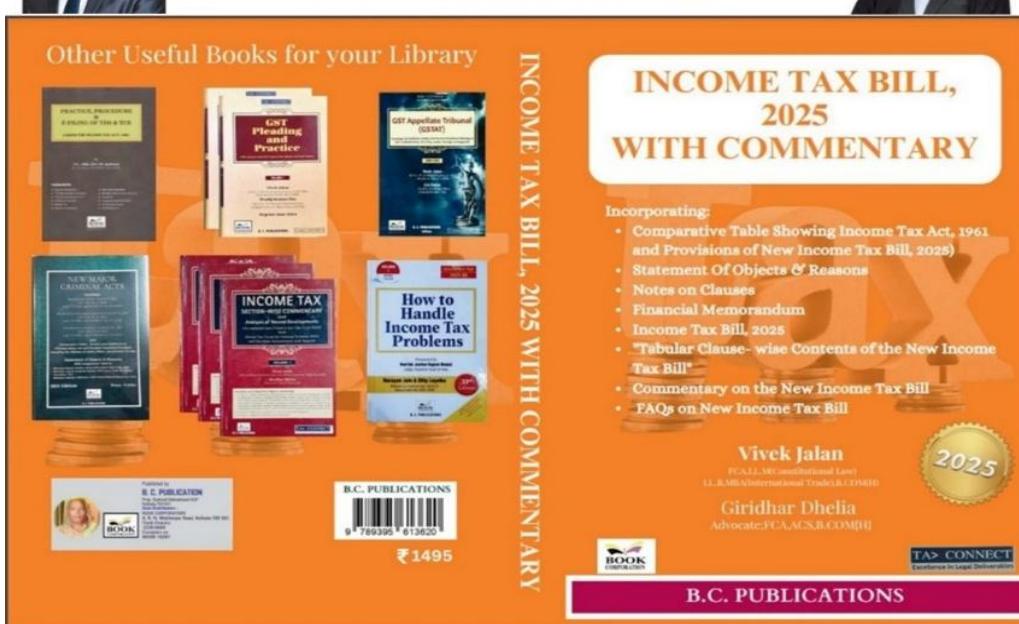
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**Author:**

**Vivek Jalan**

*[FCA, LL.M (Constitutional Law), LL.B, MBA(International Trade), B.Com(H)]*

**Giridhar Dhelia**

*Advocate, FCA, ACS, B.COM(H)*

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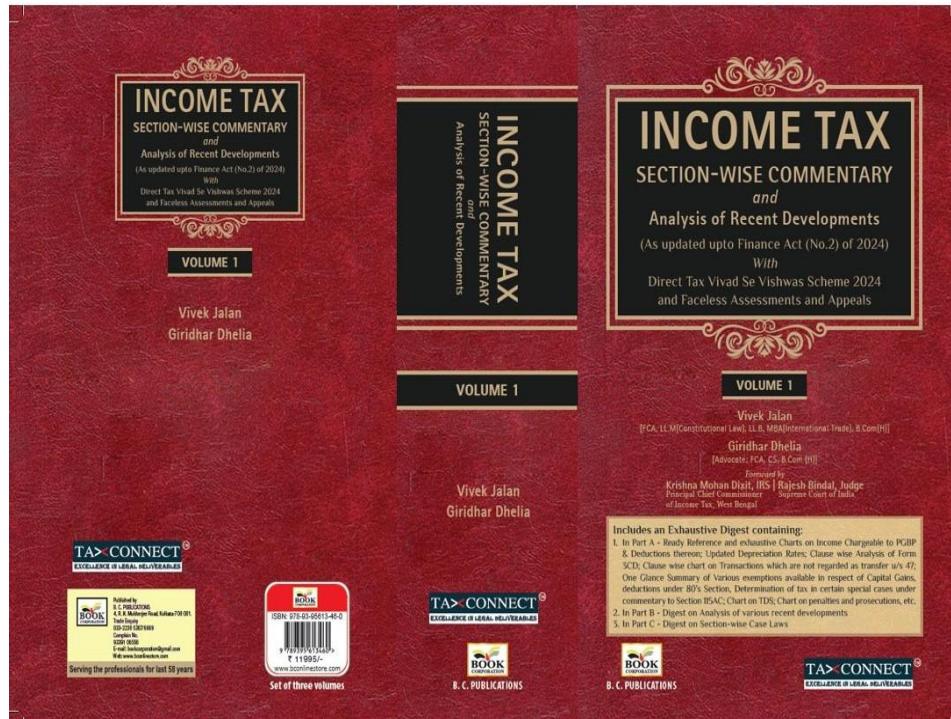
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#### Authors:

**Vivek Jalan**

[FCA, LL.M (Constitutional Law), LL.B, B.Com(H)]

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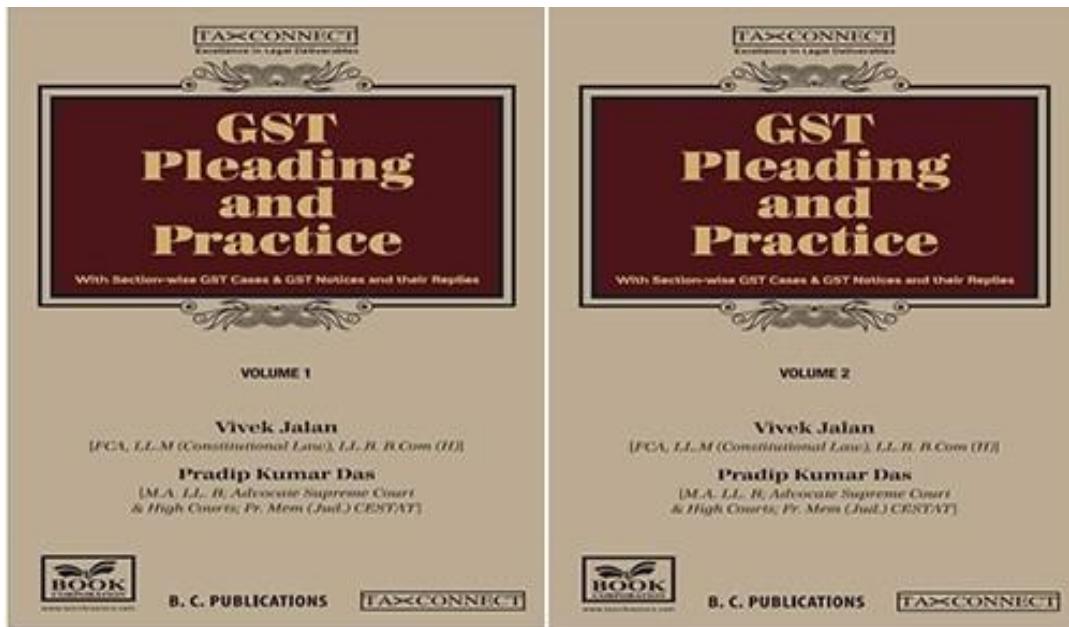
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#### Author:

**Vivek Jalan**

*[FCA, LL.M (Constitutional Law), LL.B, MBA(International Trade), B.Com(H)]*

**Pradip Kumar Das**

*[M.A. LL. B; Advocate Supreme Court & High Courts; Fr. Mem (Jud.) CESTAT]*

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### OUR OFFICES:

#### **MUMBAI**

Unit No. 312, Omega Business Park, Near Kaamgar Hospital, Road No. 33, Wagle Industrial Estate, Thane West, Maharashtra- 400604

**Contact Person:** Prashant Jha

**Email:**[prashant.jha@taxconnect.co.in](mailto:prashant.jha@taxconnect.co.in)

#### **BENGALURU**

951, 24<sup>th</sup> Main Road, J P Nagar, Bengaluru, Karnataka – 560078.

**Contact Person:** Anil Pal

**Email:**[anil.pal@taxconnectdelhi.co.in](mailto:anil.pal@taxconnectdelhi.co.in)

#### **DELHI (NCR)**

B-139, 2nd Floor, Transport Nagar, Noida-201301 (U.P)

**Contact Person:** Poonam Khemka

**Email:**[poonam.khemka@taxconnect.co.in](mailto:poonam.khemka@taxconnect.co.in)

#### **KOLKATA**

6, Netaji Subhas Road, 3<sup>rd</sup> Floor, Royal Exchange Building, Kolkata - 700001

**Contact Person:** Sandeep Mandal

**Email:**[sandeep.mandal@taxconnect.co.in](mailto:sandeep.mandal@taxconnect.co.in)

#### **KOLKATA**

R No 119; 1st Floor; Diamond Arcade; 1/72, Cal Jessore Road, Kolkata – 700055

**Contact Person:** Uttam Kumar Singh

**Email:**[uttam.singh@taxconnect.co.in](mailto:uttam.singh@taxconnect.co.in)

#### **DUBAI**

Azizi Feirooz, 803, 8th Floor, AL Furjan, Opposite Discovery Pavillion, Dubai, UAE

**Contact Person:** Rohit Sharma

**Email:**[rohit.sharma@taxconnect.co.in](mailto:rohit.sharma@taxconnect.co.in)

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