

New GSTN Advisory: GST E-Invoice within 30 days from 1st Nov 2023



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Why the new Advisory for GST E-Invoice within 30 days

A case in point is where it is understood that some unscrupulous element –

1. Had taken fake ITC and when asked about the invoice generated a back dated tax invoice through a different entity
2. paid the tax with interest vide DRC-03
3. On the current date generated an IRN, thus regularizing the transaction and getting away scot free.

Earlier The GSTN had released advisory in April by which It had prescribed that that taxpayers with an Aggregate Turnover of Rs.100 Crs or more must report invoices and credit-debit notes on the Invoice Registration Portal (IRP) within 7 days

Now they have revised the time limit from 7 days to 30 days, which shall be applicable on and from 1st November 2023. Hence incase if an invoice has a date of Nov. 1, 2023, it cannot be reported after Nov. 30, 2023.

Issues & Pointers : GST E-Invoice within 30 days

The following Issues and points in this regard must be noted –

1. Applicability to - Tax Invoice/Credit / Debit note; Export Invoice/ CN/ DN; SEZ Invoice/ CN/DN/ & Deemed Export Invoice/CN/DN will be covered under this Advisory.
2. Even incase the IRN date of a document is due, yet incase the GSTR-1 or GSTR-3B Date has fallen due, the tax has to be paid. For Eg. incase if an invoice has a date of Nov. 25 IRN due date is Dec. 24, 2023; however, the invoice has to be reported in GSTR-1/ 3B to be filed on 11th December and 20th December respectively; IRN regarding this invoice can be generated on 24th December 2023. It must be noted that as per rule 48 of The CGST Rules, the recipient can take the ITC of the Invoice only in December 2023 after the IRN is generated.
3. In certain cases it was seen that the credit notes were prepared at the end of the month. However, sometimes certain changes were made post preparation of the credit notes but before filing GSTR-1, i.e. within a span of 10 days. Hence the time limit of 7 days was an issue. Now with the time limit of generation of IRN becoming 30 days, this issue is resolved.

THANK YOU



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