



## CONFEDERATION OF GST PROFESSIONALS AND INDUSTRIES

Regd.Office: 139, 13<sup>th</sup> Floor, Jolly Maker Chamber 2, Nariman Point, Mum 400 021.

Website: [www.thecgpi.org](http://www.thecgpi.org)

**President**  
CA Sujata Rangnekar

**Secretary**  
Adv. Ishaan Patkar

**Treasurer**  
CA. Nitin Bhuta

Saturday, September 19, 2020

To  
The Hon'ble Finance Minister of India  
Rajpath Marg, E Block,  
Central Secretariat, New Delhi,  
Delhi-110011

Respected Ma'am,

Sub: Request to Extend the Implementation of E – Invoicing from October 1,2020 to April 1,2021 -Regarding CGPI representation on-Extension of the Implementation of E – Invoicing from October 1,2020 to April 1,2021

A brief Introduction about Confederation of GST Professionals and Industries (CGPI):

CGPI is a national alliance of Advocates, Chartered Accountants and other GST Professionals focused exclusively on GST. CGPI's main objects are to organize the indirect tax community into one common body so that a unified body can stand up for the interests of the professional community as well as trade and industry with respect to GST as well as ensuring that quality and timely educational initiatives are taken up, in association with our partner associations in each State and local area, in all areas, including non-metro areas. CGPI will also be allying with trade and industry associations so that their problems can be addressed in a better manner.

CGPI is a national association that will represent the interests of all GST Professionals throughout India. We initially aim to weave a platform of leading knowledgeable GST professionals in each State, city, and local area to bring all these leaders of the community on one platform. The idea is to jointly undertake to reform the law and to solve the many problems and issues that keep on arising in the implementation of the Act. The association has already

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been incorporated, and now we are in the process of creating this broader national-level platform by inviting these leaders to join the association. Currently, the association has dedicated workers across the country, who are toiling away at making this cherished dream a reality.

CGPI is conducting online webinars which covers the niche aspects of GST law which not only benefits trade, industry and commerce but also all the professionals (including all the stakeholders).

Due to Pandemic Covid 19, the Government had imposed PAN India Lockdown under the Disaster Management Act from 19<sup>th</sup> March, 2020 which is still continued.

The Government both State and Central, from time to time, extended deadlines for compliance almost all acts falling due in the period of lockdown either amending the respective act or by issue of notification.

Considering the need of hour, the SC Suo moto by its orders clarified and extended dead line for filing appeal or applications under the various act and held that the period of limitation shall end by issuing separate order in this behalf.

Due to the extended lockdown the most of the business enterprises offices on PAN India basis are not working fully, their staff not working at 100% efficiency, data compilation as well as availability is not easily available as all of them got caught unguarded as none of us ever thought of such a pandemic which would engulf the stakeholders which would not only disrupt the way they are functioning in the business environment So, in the given scenario , in our understanding it won't be possible for all the stakeholders to implement E-

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Invoicing due to following apparent issues faced by most of the stakeholders which are summarized below :-

1. Implementation and beta testing of inhouse software to get synergized with E-Invoicing system of IRN and QR Coding vis-à-vis accounting and supply chain management processes;
2. Conversion of decoded info into QR code (graphical) and printing of dynamic QR for B2C invoices is a major hurdle. Either the portal should provide a ready to use code or some utility to generate QR code from data feed sent by IRP;
3. Limited time to train the personnel to understand the minute and focused aspects of E – Invoicing;
4. FAQs manifesto for all kinds of Business Transactions to be shared so that it can be understood correctly and stakeholders can appreciate the objective of such E Invoicing in the truest manner;
5. Synergising complete supply chain management aspect of any business enterprise can be herculean task of implementation for everyone;
6. Technology platform available for implementation needs to be tested so that it acts as complementary for any business enterprises and it helps as ease of doing business in India and such system really contributes to the growth of economy to reach landmarks in the world canvas of business enterprises.

In case if request for extension is not possible for the implementation, please kindly make it optional for the specified stakeholders so that none of them are levied any kind of fines and penalties due to synchronization issues of supply chain management as all the Registered Tax Persons on PAN India are facing dreadful pandemic situations.

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We are requesting on behalf of all the stakeholders of the country viz. Trade, Commerce, Industry, All Trade Chambers and Associations, Professionals, CAs, CMAs, SME and MSME segments or any advisors etc.to defer the implementation of E- Invoicing at least till April 1 ,2021.

Your Prompt action would be highly appreciated by every stakeholder on PAN India basis.

You are requested to kindly consider the same for providing relief to the businesses in meeting this pandemic situation by providing deferment of above.

Thanking you in anticipation.

For Confederation of GST Professionals and Industries

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**CA Nitin Bhuta**

**Hon.Treasurer**

Authorized Signatory

Mobile No +91 72082 96001/+91 98211 64261/+91 98202 95319

Date: 19/09/2020

Place: Mumbai

CC to:

1. The Honourable Chairman,  
Office of the GST Council Secretariat  
5th Floor, Tower II, Jeevan Bharti Building, Janpath Road,  
Connaught Place, New Delhi-110 001  
E-mail: [contact.gstcouncil@gov.in](mailto:contact.gstcouncil@gov.in)



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