



# NAGPUR CHAMBER OF COMMERCE LTD

73, Central Avenue, Seva Sadan Square, Nagpur-440018. Ph. : 2720164 Email : nccIngp@gmail.com

To,

■ PRESIDENT  
**VISHNUKUMAR PACHERIWALA**  
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(M) 9371115471

■ I.P.P.  
**KAILASH JOGANI**  
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■ SR. VICE PRESIDENT  
**PRADEEP JAJOO**  
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■ VICE PRESIDENT  
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■ TREASURER  
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■ JOINT SECRETARY  
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■ JOINT SECRETARY  
**NITINN BANSAL**  
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1) **Smt. Nirmala Sitharaman**  
**Hon'ble Union Minister of Finance & Corporate Affairs**  
Government of India, North Block,  
New Delhi-110001

2) **The Chairman**  
**The Central Board of Direct Taxes,**  
North Block,  
New Delhi-110001

Sub.: Request for Extension of due date for filing of Tax Audit reports,  
Transfer Pricing Audits and Income-tax returns – AY 2020-21 till  
31st March 2021.

Hon'ble Madam / Sir,

Our Chamber, Nagpur Chamber of Commerce Limited, was formed almost 70 yrs back and is one of the oldest organization of the traders & business fraternity not only of Nagpur but of entire Vidarbha Region. The Chamber is member of FICCI and serving to almost 5000 traders & business entities.

We would like to address the concern of the members, being business & traders fraternity which are of utmost importance and need to be addressed by your good office on utmost priority. There is sufficient cause and need for extension of last date of filing Income tax Returns for a reasonable period not less than 31st March 2021.

As you are aware that all assesseees who are liable to audit either under Income Tax Act, 1961 or under any other law for the time being in force are required to file their return of income by 30th November of the Assessment year 2020-21.

The business / traders are also supposed to file tax audit report by 31st October, 2020.

Due to the following reasons a case is made out for extension of above date.

### The Covid-19 Pandemic

At the outset, we commend the Government for efficient tackling of the pandemic using lockdown and staggered unlock as a tool. We also appreciate that the government suo motu provided extension for tax audit and income tax return filing up to 31st October, 2020 and 30th November, 2020 respectively.

The country is being unlocked gradually and as your goodself may be aware that the spread and severity of the Corona virus has just started to decline. Amidst this, several restrictions are still in place in the States and movement is still restricted. Commuting via public buses and/or other public transport is restricted and not fully operational. Given the increasing numbers of reported cases of COVID-19 there is a fear among the people of getting infected due to which they prefer not travelling at all or restrict it to the vicinity of their homes for their necessity. Due to this, several business units, industries and private offices have still not resumed functioning at all or fully. This also includes the offices of the Chartered Accountants, their staff and audit assistants.



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*Even, Hon'ble PM in his address to the nation yesterday i.e. on 20th October 2020 specifically stated that the war against Covid is still going on. The number of cases are decreasing but the same is not over, the public should still continue to take utmost care and follow the self imposed restrictions.*

Due to this, the details required for carrying on tax audit and filing the return of income are not being compiled and send promptly and thus there are hurdles in completion of audits. Also travelling to the place of audit by the Chartered Accountants and their staff are very difficult or travel by the traders / business person's staff to the office of Chartered Accountants are also very difficult.

Several Chartered Accountants and Tax Practitioners themselves have also been infected and have not been able to work for minimum of 21 days. Also, visiting any audit place exposes them to the virus making them prone infection. Further, the senior citizens including senior professionals and senior assesseees are advised to stay at home

These hindrances are making it very difficult for the assesseees, the Chartered Accountants and the Tax Practitioners to comply with even the extended due dates.

### Release of utility for Revised Form 3CD (Tax Audit Report)

On 01st October 2020 vide notification there is revision in form 3CD i.e. tax Audit for which the revised schema / utility is not yet released, this is creating a situation of confusion and unrest among the business & Trade fraternity.

### Extension of due date for assessment year 2019-20

Recently, on the 30th day of September, 2020 the CBDT has extended the date for filing belated and revised return of income for Assessment Year 2019-20. Date was extended from 30th September, 2020 to 30th November, 2020, that too suo motu. We appreciate the step taken by CBDT in the interest of taxpayer community.

### Extension of last date of AGM

Ministry of Company Affairs has extended the last date of holding AGM for corporates to 31st December, 2020 only due to pandemic. Based on this, the statutory audit can be concluded even beyond 30th November, 2020.

Madam, you may please note that the tax audit can be conducted only post completion of statutory audit, post which only the income tax return can be filed by the Company. In a case where the Transfer Pricing audit is also applicable, the return shall be filed only after the filing of Transfer Pricing Report in Form No. 3CEB. Therefore, complying with the tax audit and Transfer Pricing Report due date of 31st October, 2020, and return filing due date of 30th November, 2020 seems very improbable.

Our Chamber is of the belief that in a democratic country, the People of the country are the supreme authority and it is confident that the Government will not suppress the concerns of its People. We understand that the Govt. is well aware of the above facts and will definitely consider the above representation of date extension. Also we are rather confident that the Government will suo moto extend the dates and that too well before last date.



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We would be thankful if your goodself judiciously extend the date well in advance which will keep the trade fraternity as well as professionals relieved from stress and movement in this current pandemic situation and would be effective and meaningful.

Regards

For Nagpur Chamber of Commerce Limited

■ PRESIDENT

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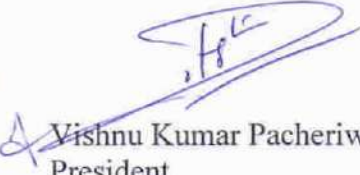
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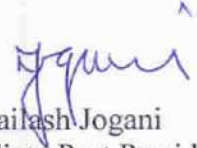
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Vishnu Kumar Pachariwala  
President

  
CA. Kailash Jogani  
Immediate Past President

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Cc. : The Hon'ble Prime Minister's Office, New Delhi

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