



DISTRICT TAX CONSULTANT'S ASSOCIATION CHITTORGARH (RAJ.)

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Dated : 23.12.2021

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To,
Smt. Nirmala Sitaraman
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To,
Shri Tarun Bajaj
Hon'ble Revenue Secretary,
Office of the Secretary (Revenue),
North Block, NEW DELHI - 110 001
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Sub : Request for extension of various due dates under
Income-tax Act, 1961 for AY 2021- 22 and
for filing the Annual Reconciliation Statement
(GSTR9C) along with the annual return (GSTR9) for
financial years 2020-21

Respected Madam/Sir,

We wish to bring in your kind attention about the problems being
faced by taxpayers /tax professionals to meet the up-coming
various return compliances.

You are well aware that beside the technical and practical glitches
in income tax portal, though many return are still pending but the
return filling count as on 22.12.2021 was 4,09,33,362 **and it is
only due to continuous hard working of all tax consultants in
a challenging environment, This effort must be appreciated
and it is need of time to extend the various due dates for true
and correct compliances instate of increasing figures.**

The tax compliances are badly effected on lurching of new income
tax portal due to following reasons :

1. Unexpected Delay : The Income Tax Department launched its
new e-filing Portal on June 7, 2021 with objectives of ease of
tax compliance speedy, but the working, glitches and
improvement of service is still under process and it is not
working smoothly after passing of more than 5 months



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2. Delay and error in various utility :)

It is expected that The utilities for ITR-1, ITR-2, ITR-3, ITR-4, ITR-6, ITR-7 shall be available on 01.04.2021, but these were released in a phase manner and unexpectedly very late, moreover these are error prone and further improvement are still in process.

Tax Audit form are provided in working condition in first week of December, offline utility of form 10B and 29B is still not available.

There are still technical issues regarding form 10-IC, 10-IE and uploading and accepting tax audit reports.

3. Huge Pending Returns :

Though about 4.09 cror return has been filed in last three month but still more than 3.25 cror returns have to be filed in next 7 days which is just an impossible job.

It is humble request that the reasons for pendency shall be analyzed and it is very easy to understand it,

The departments attitude to keep the discipline among tax payers in compliances is good approach, but first the tax payers shall be provided a proper infrastructure for all these.

4. Huge Pending Tax Audit :

The count of filling of tax audit Reports are very poor due to delay in providing utilities. About more than 70% Tax audits are till pending and auditor must be given proper time for quality work.

5. Introduction of AIS and TIS :

It is very welcome step that department has provided first time various information in AIS and TIS by which tax payers can easily reconcile their transactions.

This is first time that such information are provided but there are some error of data mismatch in these reports so it is taking more time to reconcile and recheck all such transactions.



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6. Annual Return and reconciliation statement in GST :

It is mandatory for a dealer having turnover of more than 2.00 Cror to file annual return in form GST-9 and dealers having turnover more than 5.00 cror a reconciliation statement in 9C with annual return up to 31.12.2021 and pendency of such compliances are about 90%

All such dealers are required to compulsory audit under Income Tax Act, till date there is delay in these compliances as narrated above, and in this situation it is not possible for dealers to file these return up to 31.12.2021.

In view of the above mentioned genuine difficulties faced by tax payers and professional it is humble request to extent the last date of followings :

Particulars	Requested extension
Last date for income tax return of non audit case	31.01.2021
Last date for Tax Audit.	28.02.2021
Last date for income tax return of Audited case	31.03.2021
Last date for GST Return GSTR-9 and 9C.	31.03.2021

It is requested to extend these extension may be announced at earliest for true and correct compliances.

We hope that you honor will give kind consideration on our representation and take appropriate action at earliest.

Thanking You !

Yours' Faithfully

FOR : DISTRICT TAX CONSULTANTS ASSOCIATION

(CA Gopal K. Mundra)

President