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# The Malad Chamber of Tax Consultants

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**Date: 24 September 2026**

To,
**The Chairman**
**Central Board of Direct Taxes**
Department of Revenue
Ministry of Finance
North Block
New Delhi - 110001

**Respected Sir,**

**Sub.: Representation for extension of due date for furnishing Tax Audit Reports and other audit reports from 30 September 2026 to 31 October 2026 and consequential extension of due date for filing Income-tax Returns for Assessment Year 2026-27**

The **Malad Chamber of Tax Consultants (MCTC)** is a premier professional association established in the year 1978 with the primary object of spreading and enhancing knowledge in the field of taxation and allied laws amongst its members and the public at large. The Chamber is registered under the Societies Registration Act, 1860 and the Bombay Public Trusts Act, 1950. MCTC presently has a membership strength of over 1,400 professionals comprising Chartered Accountants, Advocates, Company Secretaries, Cost Accountants and Tax Practitioners who are engaged in diverse areas of tax and regulatory practice.

On behalf of our members and the larger taxpayer community served by them, we respectfully submit this representation seeking extension of the due date for furnishing Tax Audit Reports under section 44AB of the Income-tax Act, 1961 and other audit reports due on 30 September 2026 to **31 October 2026**, along with a consequential extension of the due date for filing Income-tax Returns in audit cases from 31 October 2026 to **30 November 2026**.

We submit that the present compliance season has witnessed an extraordinary convergence of circumstances which have substantially reduced the effective time available for completion of tax audits and have made adherence to the present deadline extremely onerous without compromising audit quality.

1. **Severely Compressed Effective Audit Window**
   The most significant factor warranting extension is the substantial compression of the effective audit period. The due date for filing Income-tax Returns of non-audit cases fell on **31 August 2026**, and the same pool of tax professionals, staff and infrastructure is


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responsible for handling both non-audit and audit compliances. Consequently, meaningful tax audit work could effectively commence only after the completion of the non-audit filing season.

In practical terms, the profession has been left with barely one month to complete tax audits that ordinarily require extensive verification and review work. The statutory framework contemplates that tax audits should be conducted with sufficient time and professional diligence. The effective reduction of the audit season to a single month defeats the very objective of a quality audit and places undue pressure upon taxpayers and professionals alike.

2. **Tax Audit is Not Merely an Uploading Exercise**

A tax audit involves considerably more than the mere furnishing of Form 3CD. Before an audit report can be issued, books of account are required to be finalised, scrutinised and reconciled with multiple statutory records and compliance filings.

The auditor is expected to examine and reconcile, amongst others:

- Financial statements and books of account;
- GST returns and turnover disclosures;
- TDS returns and Form 26AS data;
- Information reported in AIS and TIS;
- Statutory dues such as PF and ESI compliances;
- MSME disclosures and outstanding liabilities;
- Related-party transactions and specified reporting requirements;
- Depreciation schedules and tax adjustments;
- Loan and deposit transactions;
- Various disclosures required under Form 3CD.

The reconciliation process itself consumes substantial professional time and requires continuous interaction with taxpayers, accountants and management personnel. A hurried audit inevitably increases the possibility of reporting errors, notices, rectifications and avoidable litigation.



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3. **Repeated Revisions in ITR Utilities and Reporting Requirements**

   The compliance burden has been further aggravated due to delayed availability and repeated revisions of ITR schemas, return utilities and validation rules. Several utilities were released much later than in previous years and underwent revisions during the very period when audit work was required to be completed. For instance, ITR-6 (Companies) came on 4 August (schema/Excel) and 20 August (offline utility) – 41 days before the audit deadline. ITR-3 and ITR-5 utilities were revised again on 1 September, the day after the non-audit deadline.

   Each revision necessitated corresponding software updates, data validation and reconciliation exercises. Since figures reported in tax audit reports are required to match the corresponding disclosures in the Income-tax Returns, professionals have repeatedly been required to revisit previously completed work, resulting in significant loss of productive time.

4. **Multiple Time-Barring and Statutory Deadlines During September 2026**

   September 2026 has witnessed an unprecedented concentration of statutory due dates under various laws.

   Apart from Income-tax compliances, tax professionals have simultaneously been required to attend to:

   - GST returns and reconciliations;
   - TDS and TCS compliances;
   - Advance tax obligations;
   - EPF and ESI compliances;
   - MCA and company law filings;
   - Annual General Meeting related compliances;
   - Various audit reports and certification requirements under the Income-tax Act.

   In addition, **30 September 2026 is also the last date for issuance of notices under Section 73 of the CGST Act for Financial Year 2022-23.** Consequently, taxpayers and tax professionals are required to devote substantial time and resources towards responding to GST proceedings, departmental notices, reconciliations and audit-related matters having the same deadline.



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Further MCA Scheme CCFS-2026 was extended to 15 September 2026 (General Circular 04/2026 of 31 August 2026, after the 5 June MCA data-centre fire). Pending MGT-7/7A, AOC-4, ADT-1 and other forms of many family-owned companies had to be prepared and certified by the same CAs in the first half of September. This overlap has further reduced the effective time available for conducting tax audits and preparing accurate tax audit reports.

5. **Festivals Resulting in Reduced Working Days**

   The month of September 2026 has also witnessed several major religious and cultural festivals observed across different parts of the country.

   The period included celebrations relating to **Ganesh Chaturthi and the subsequent Ganesh festival**, during which numerous business establishments and offices function with reduced capacity. The month also witnessed **Paryushan and Das Lakshan Parva**, which are amongst the most significant religious observances for the Jain community.

   These festivals naturally result in reduced availability of taxpayers, key managerial personnel, accountants and supporting staff for finalisation of accounts, confirmations and audit-related discussions. Consequently, the number of effective working days available for completing audits has been considerably lower than the nominal calendar days available during the month.

6. **No Adverse Impact on Revenue Collection**

   The extension sought would not prejudice revenue collection in any manner. Taxes continue to be collected through advance tax, TDS and self-assessment tax mechanisms. On the contrary, granting reasonable additional time would facilitate accurate and complete reporting, leading to improved quality of compliance, reduction in inadvertent errors and minimisation of future disputes and litigation.

**Prayer**

In view of the foregoing facts and circumstances, we respectfully request the Central Board of Direct Taxes to:

1. Extend the due date for furnishing Tax Audit Reports under section 44AB and all other audit reports falling due on **30 September 2026 to 31 October 2026**;
2. Consequently, extend the due date for filing Income-tax Returns for audit cases falling due on 31 October 2026 by a corresponding period;



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3. Announce the extension at the earliest possible opportunity so that taxpayers and professionals are able to plan and execute their compliance responsibilities in an orderly and efficient manner.

We sincerely believe that the above relief would not only address the genuine hardships faced by taxpayers and professionals but would also promote the larger objective of ensuring high-quality audits, accurate reporting and effective tax administration.

We trust that the Board will kindly consider this representation favorably in the interest of the taxpayer community, the profession and the administration alike.

**Thanking You,**

Yours faithfully,

**For Malad Chamber of Tax Consultants (MCTC)**

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|---|---|
| **President** | **Chairman Law and Representation Committee** |
| **Bhavin Mehta** | **CA Atul Ruparelia** |



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