THE PUNJAB ACCOUNTANTS ASSOCIATION (REGD.)

Registration No. 304/2019-20
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Date: 11 September 2026

To
The Hon’ble Finance Minister
Government of India
North Block
New Delhi – 110001

Subject: ***Request for extension of due date for furnishing Tax Audit Reports for AY 2026-27***

Respected Madam,

The Punjab Accountants Association (TPAA), being the Punjab-level Apex Body representing Accounts Professionals across the State of Punjab, respectfully submits this representation seeking an appropriate extension in the due date for furnishing Tax Audit Reports for Assessment Year 2026-27.

At the outset, the Association appreciates the Government’s decision to prescribe 31 August 2026 as the due date for filing Income-tax Returns in non-audit cases. This is a welcome and taxpayer-friendly measure, as it provides a separate compliance window and helps distribute the overall compliance workload.

However, under the present compliance calendar, the due date for non-audit Income-tax Returns is 31 August 2026, whereas the Tax Audit Report is required to be furnished by 30 September 2026. Thus, only one month is available between these two important compliance milestones.

In our considered view, this one-month interval is not sufficient for audit cases, particularly considering the nature and extent of work involved in completing a proper tax audit.

1. Tax Audit requires substantial verification and reconciliation

A Tax Audit is not merely a form-filing exercise. Before furnishing the Tax Audit Report, the taxpayer and the tax professional are required to undertake, inter alia:

• Detailed examination of books of account and supporting records;
• Verification of financial information and relevant particulars;
• Reconciliation of accounting records with tax-related information;
• Examination of various statutory and tax disclosures;
• Identification and resolution of discrepancies;
• Preparation and verification of required particulars; and
• Final professional review and authentication before submission.

These processes require adequate time, particularly where the volume and complexity of transactions are substantial.

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2. Increased compliance requirements during the current year

The compliance burden has further increased during the current year owing to enhanced financial-statement and disclosure requirements applicable to non-corporate assessees.

The additional information and disclosures require greater coordination between taxpayers and professionals and necessarily involve additional verification and reconciliation before the final Tax Audit Report can be furnished.

3. Staggered release of ITR forms and online utilities

The practical time available for completing audit-related compliances has also been affected by the staggered release of ITR forms and their corresponding online utilities during the current year.

ITR-3, ITR-5, ITR-7 and ITR-6 were released on different dates, while the corresponding online utilities became available subsequently. This has resulted in a compressed working window for taxpayers and professionals engaged in audit-related compliances.

4. Minimum two-month interval is reasonably required

In view of the above circumstances, the Association respectfully submits that a minimum two-month interval between the non-audit ITR deadline and the Tax Audit Report deadline would provide a more practical and reasonable compliance framework.

Since the Government has already prescribed 31 August 2026 for non-audit returns, the desired two-month interval can appropriately be achieved by extending the Tax Audit Report due date from 30 September 2026 to 31 October 2026.

This would preserve the existing non-audit return deadline while providing audit cases with a more workable compliance period.

5. Extension is sought for proper and accurate statutory compliance

The present request is not intended to seek postponement of tax payment or any undue benefit to taxpayers.

The extension is being requested in the interest of accurate, complete and properly verified statutory compliance. A reasonable additional period would enable taxpayers and professionals to undertake the audit, reconciliation, verification and review process in a systematic manner.

It would also reduce the possibility of inadvertent errors or omissions arising merely because of an unduly compressed compliance timeline.

7. Conclusion

The Association sincerely believes that the requested extension would provide a reasonable and practical compliance window without disturbing the existing 31 August 2026 deadline for non-audit returns.

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We therefore earnestly request your good office to consider the genuine practical difficulties being faced by taxpayers and the accounting fraternity and to issue the necessary notification/circular at the earliest, extending the Tax Audit Report due date to 31 October 2026.

We shall be grateful for your kind and favourable consideration of this genuine request.

Thanking you,

Yours faithfully,

For THE PUNJAB ACCOUNTANTS ASSOCIATION (TPAA)

NARESH CHALOTRA
President

SANJEEV GUPTA
General Secretary

Copy forwarded to:

1. The Hon’ble Prime Minister of India
2. The Hon’ble Minister of State for Finance
3. The Revenue Secretary, Government of India
4. The Chairman, Central Board of Direct Taxes (CBDT)
5. The Chief/Principal/Commissioner of Income Tax (Exemptions)