TAX BAR ASSOCIATION BHILWARA

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Ref No. TBA/CBDT/REP/2026-27/01 Date: 14.09.2026

To,

The Hon'ble Chairperson,

Central Board of Direct Taxes (CBDT),

Department of Revenue, Ministry of Finance,

Government of India,

North Block, New Delhi – 110001

Subject: Representation for extension of due date for furnishing Tax Audit Reports and Forms 10B/10BB for AY 2026-27 from 30 September 2026 to 31 October 2026

Respected Sir,

The **Tax Bar Association, Bhilwara, Rajasthan**, representing approximately 250 members, respectfully submits this representation seeking extension of the due date for furnishing Tax Audit Reports in **Form Nos. 3CA/3CB along with Form 3CD** and applicable audit reports in **Forms 10B/10BB** for **Assessment Year 2026-27** from **30 September 2026 to 31 October 2026**.

We place the following genuine and practical difficulties being faced by taxpayers and tax professionals across the country:

1. Progressive availability and subsequent updating of relevant ITR utilities

Tax audit and income tax return of audited person are interdependent and cannot be completed as a separate work and for tax-audit cases, the relevant Income-tax Returns principally include **ITR-3, ITR-5 and ITR-6**. As reflected in the Income Tax Department's utility records for AY 2026-27, these utilities became available progressively and, in certain cases, were subsequently updated:

Excel Utility	Initial availability	Subsequent/latest update	Time available to audit
ITR-3	18 June 2026	01 September 2026	30 days
ITR-5	07 July 2026	01 September 2026	30 days
ITR-6	04 August 2026	04 August 2026	57 days

Thus, although the Tax Audit utility was made available relatively early, the complete ecosystem required for finalisation of tax-audit cases became available only progressively thereafter.

The electronic filing process involves preparation of data, schema-based validations, utility validations, digital signatures, uploading and subsequent approval by the assessee.

The Income Tax Department's utility records themselves reflect subsequent releases and updates during the compliance period. Every material change in the utility, schema or validation framework can require professionals to revisit information already prepared and, wherever necessary, make consequential modifications. This further reduces the effective period available for accurate and error-free completion of audits.

This has materially reduced the effective time available to tax professionals for reconciliation, review and error-free completion and finalization of audit assignments.

2. Revised ICAI requirements for financial statements of non-corporate entities

The Institute of Chartered Accountants of India has revised its **Guidance Note on Financial Statements of Non-Corporate Entities**.

As per ICAI's announcement dated 31 March 2026, the revised Guidance Note is applicable in a phased manner, with **Phase I applicable to entities whose turnover exceeds ₹5 crore for accounting periods beginning on or after 1 April 2025**.

The revised presentation, classification and disclosure requirements have increased the extent of work involved in preparation, finalisation and review of financial statements for applicable entities.

These requirements consequently have a direct bearing on the time required for completion of the related Tax Audit.

3. Reduction in effective Tax Audit time due to change in the due date for business-income returns.

A further and significant practical difficulty arises from the change in the due date for filing returns of income in non-audit business/profession cases for AY 2026-27 from 31 July 2026 to 31 August 2026. While explaining the rationale for this legislative change, it was stated that the revised due date was introduced specifically to provide more time to non-audit business cases to prepare their returns. The amendment is applicable to AY 2026-27.

While this extension is undoubtedly a welcome and taxpayer-friendly measure, it has, as a matter of practical reality, correspondingly compressed the effective working period available to the same fraternity of Chartered Accountants for completing Tax Audit assignments, particularly during the crucial months of August and September.

The taxpayers requiring tax audit and those not requiring tax audit substantially overlaps in terms of the professional ecosystem handling their accounts, financial statements, tax computations, GST/TDS reconciliations and income-tax compliances. Consequently, the additional month granted to non-audit business taxpayers has necessarily resulted in a concentration of professional work relating to audit cases into a shorter residual period immediately preceding 30 September 2026.

It is respectfully submitted that where the legislature has consciously recognized, for non-audit business cases, the need for an additional month to enable proper preparation of accounts and compliance, there is an even stronger case for providing a corresponding reasonable extension in audit cases, where the statutory responsibility involves an additional layer of independent professional verification, certification and reporting.

4. Extensive verification and reconciliation involved in Tax Audit

Tax Audit is not merely an exercise of uploading Form 3CD. It involves detailed examination, verification and reconciliation of numerous financial and statutory records, including, inter alia:

- books of account and financial statements;
- GST returns and turnover reconciliation;
- TDS/TCS records;
- AIS/TIS and other information available with the Department;
- fixed assets and depreciation;
- statutory payments and their due dates;
- loans, advances and investments;
- related-party transactions; and
- numerous other disclosures and particulars required under Form 3CD.

Discrepancies arising during these reconciliations frequently require further examination, explanations, documentary evidence and clarification from the assessee.

The process therefore requires adequate time for a meaningful and professionally responsible audit.

5. Quality of Tax Audit and professional responsibility

Tax Audit is a substantive statutory and professional responsibility.

The Tax Auditor is required to exercise professional judgment and make several factual, accounting and statutory disclosures. The correctness and reliability of these disclosures are relevant not only to the assessee but also to the Revenue. An excessively compressed timeline may increase the possibility of inadvertent errors and omissions.

Adequate time is therefore essential to enable Chartered Accountants to undertake proper verification, reconciliation, discussion with assessees, review and professional evaluation before furnishing the audit report.

6. Forms 10B/10BB

The audit reports in **Forms 10B/10BB** also involve detailed reporting and certification requirements in respect of eligible charitable or religious trusts and institutions and other specified entities.

The prescribed forms require compilation and verification of substantial financial, application-of-income and other statutory information. The Income Tax Department recognises Forms 10B and 10BB as prescribed audit reports under the Income-tax Act, 1961.

Accordingly, the same practical considerations relating to adequate time for verification, reconciliation, documentation and professional review are equally relevant to these forms.

Prayer

In view of the facts and circumstances stated above, we most respectfully request that the appropriate powers under **Section 119 of the Income-tax Act, 1961** may kindly be exercised to:

(a) extend the due date for furnishing Tax Audit Reports in **Forms 3CA/3CB along with Form 3CD** for AY 2026-27 from **30 September 2026 to 31 October 2026**;

(b) extend the due date for furnishing applicable audit reports in **Forms 10B/10BB** for AY 2026-27 to **31 October 2026**; and

(c) suitably align or clarify the consequential compliance requirements, wherever considered necessary, so that taxpayers and tax professionals are not placed at a disadvantage merely on account of the compressed compliance timeline.

We respectfully submit that the requested extension is not sought to dilute statutory compliance, but to **facilitate accurate, complete and properly verified compliance**.

Granting the extension would enable Chartered Accountants and taxpayers to undertake the required audit and reporting responsibilities with due professional care, reduce the possibility of inadvertent errors and omissions, and ultimately ensure better-quality information for the Revenue.

We sincerely hope that the genuine and widespread practical difficulties being faced by taxpayers and tax professionals will receive your kind, urgent and sympathetic consideration.

Thanking you,

Yours faithfully,

For Tax Bar Association, Bhilwara

CA Amit Seth
President

CA Ashish Singhvi
Secretary

Copy to

01. The Hon'ble Finance Minister, Ministry of Finance, Government of India,

Room No. 15075, Kartavya Bhawan - I, New Delhi