BIKANER TAX CONSULTANTS ASSOCIATION

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Date – 15th September, 2026

To,

The Hon'ble Union Minister of Finance
Ministry of Finance
Government of India
North Block, New Delhi – 110001

Subject: Representation seeking extension of due date for furnishing Tax Audit Reports, Forms 10B/10BB and consequential audited Income-Tax Returns for Assessment Year 2026–27 up to 31 October 2026

Respected Madam/Sir,

We, **Bikaner Tax Consultants Association**, most respectfully submit this representation seeking your kind and urgent intervention for extending the due dates for furnishing Tax Audit Reports in **Form Nos. 3CA/3CB along with Form 3CD**, audit reports in **Form Nos. 10B/10BB**, and the consequential audited Income-Tax Returns for **Assessment Year 2026–27.**

The present due date for furnishing the Tax Audit Report is **30 September 2026**. Considering the practical difficulties being faced by taxpayers, tax professionals and institutions across the country, we respectfully request that the due date for the aforesaid compliances may kindly be extended up to **31 October 2026**.

The representation is being made on behalf of the tax professionals and taxpayers of Bikaner and adjoining areas. The difficulties set out below are genuine, widespread and practical in nature and have materially compressed the effective time available for completion of tax audits and consequential return filing.

1. Shifting of the due date for non-audit cases from 31 July to 31 August

In earlier years, the due date for furnishing returns of income in non-audit cases ordinarily fell on **31 July**. However, for Assessment Year 2026–27, the due date for such cases has been shifted to **31 August 2026**. While the shifting the due date from 31 July to 31 August 2026 is a welcome step but after completion of non-audit return filings on 31 August 2026, tax professionals have been left with practically only one month to complete the entire tax-audit process by **30th September 2026**

Tax professionals are required to organise their work according to the chronological order of statutory deadlines. Therefore, immediately after the return-filing utilities and relevant tax information became properly available, professionals were required to accord priority to salaried taxpayers and non-audit business cases because their statutory due date of 31 August 2026 fell before the tax-audit deadline.

Consequently, almost the entire period up to 31 August 2026 was consumed in preparing, verifying and filing returns of income for salaried taxpayers and non-audit business assesses.

2. Limited effective time available for completion of tax audits

The due date for furnishing Income-Tax Returns in non-audit cases for Assessment Year 2026-27 was **31 August 2026 which in the preceeding years was 31st July.** Consequently, tax professionals have effectively been left with the month of September for completing a substantial volume of tax audits, preparation of audit reports and filing of consequential Income-Tax Returns. The tax-audit process is not merely an exercise of uploading Form 3CA/3CB and Form 3CD. It involves detailed examination and verification of books of account, financial statements, bank statements, GST records, TDS/TCS information, Form 26AS, Annual Information Statement (AIS), Taxpayer Information Summary (TIS), stock records, fixed assets, statutory payments, related-party transactions and numerous other accounting and statutory matters. Each of these matters requires adequate time for examination, reconciliation, obtaining explanations and supporting documents from the assessee and, wherever necessary, carrying out further verification. Completion of these activities within the short period remaining after 31 August 2026 is extremely difficult. The compressed schedule also increases the possibility of inadvertent errors and omissions in audit reports.

3. Dependence upon information and confirmations from third parties

Completion of several audit procedures is dependent upon information being obtained from banks, customers, suppliers, lenders, debtors, creditors and other third parties.

In practice, complete information and explanations are frequently not available with the assessee at one time and are furnished in stages. Differences between books of account and third-party confirmations or portal-generated information may require repeated reconciliation and clarification. The auditor, being responsible for expressing an independent professional opinion and making various factual disclosures in Form 3CD, requires sufficient time to resolve such discrepancies before finalising the audit report. Since audit of other parties are also undergoing in this short span of time third party confirmations are not provided on time and hence witll hamper the audit procdures to be followed by the professionals.

4. Changes and continuing updates in return-filing utilities and schemas

The compliance process for Assessment Year 2026-27 has involved revised forms, schemas, validations and updates to the Income-Tax Department's utilities. The common Income-Tax Return utility was initially released on 20 May 2026, and subsequent versions and updates have continued to be released, including a further version as recently as 2 September 2026.

The Tax Audit Report and the Income-Tax Return are closely interconnected. Several disclosures and figures in the return are dependent upon the finalisation of the audited financial statements and audit report. Changes in utilities, schemas and validations close to the due date necessarily reduce the effective time available for preparation, testing, review and final filing. Tax professionals are required not only to understand such changes but also to test the updated utilities, identify validation issues, reconcile data and, where necessary, revise work already undertaken. During the early months of the financial year, changes in various utilities relating to PAN, TAN, TDS, TCS and tax-payment compliances created significant practical challenges for taxpayers and professionals. The procedural position and functioning of the relevant systems settled only around the first week of July 2026. Furthermore, information appearing in the Annual Information Statement, Taxpayer Information Summary and Form 26AS became properly visible and capable of effective reconciliation only thereafter.

Thus, the period from the beginning of the financial year until the first week of July 2026 could not be effectively utilised for the preparation and filing of returns or for completing the related reconciliation work.

5. Increased work arising from revised financial statement requirements

The implementation of the **ICAI Guidance Note on Financial Statements of Non-Corporate Entities** has also increased the workload in respect of eligible non-corporate entities.

As announced by the Institute of Chartered Accountants of India on 31 March 2026, the first phase of applicability covers accounting periods beginning on or after 1 April 2025 for entities having turnover exceeding ₹5 crore. The revised presentation requirements, formats and disclosures necessitate additional time for finalisation and review of financial statements. Since the Tax Audit Report can ordinarily be finalised only after the underlying financial statements and books of account have been properly completed and reviewed, the additional work has a direct bearing on the time available for completion of tax audits.

6. Overlapping statutory and professional compliances

Tax professionals and taxpayers are simultaneously required to attend to numerous other statutory and professional obligations during this period, including:

- GST returns and GST reconciliations;
- TDS and TCS compliances;
- MCA and other corporate filings;
- statutory audits;
- finalisation of financial statements;
- bank and financial institution reporting;
- internal audits;
- departmental compliances; and
- other regulatory and professional assignments.

The period from July to October is therefore already characterised by a substantial concentration of statutory compliance requirements. The overlapping deadlines have resulted in significant pressure on both taxpayers and professionals.

7. Ongoing Local Body and Ward Panchayat Elections

A further practical difficulty during the current period is the ongoing **local municipal and Ward Panchayat elections in Rajasthan**, which are scheduled to be conducted in phases on **9th, 11th, 14th, 21st and 23rd September 2026**. The election process has a direct and indirect impact on the availability of taxpayers, business owners, employees, accountants, tax professionals and other persons associated with the audit and compliance process.

During the election period, a considerable number of persons are directly engaged in election-related duties, campaigning, polling arrangements, administrative responsibilities or other election-related activities, while others are indirectly affected due to movement restrictions, local administrative engagements and reduced availability of business personnel. In smaller towns and local business communities in particular, such activities have a substantial impact on the normal functioning of businesses and professional establishments.

The fact that the elections are being conducted on multiple dates throughout September further reduces the number of effective working days available during the already compressed period for completion of tax audits and consequential return filing. This is particularly significant for small and medium-sized businesses where the availability of the proprietor, partners, key employees, accountants and other persons having knowledge of the financial records is essential for resolving audit queries and providing explanations and supporting documents.

Accordingly, the ongoing election-related engagements constitute an additional and genuine practical difficulty in completing the statutory audit and return-filing obligations within the existing deadline of **30 September 2026**. Granting an extension up to **31 October 2026** would provide reasonable additional time to complete the audit process without compromising the quality and accuracy of statutory compliance.

8. Tax audit is a substantive professional responsibility

Tax audit is a substantive statutory and professional responsibility and cannot appropriately be treated as a mere procedural formality.

Form 3CD contains numerous factual, accounting and statutory disclosures, many of which have significant implications for the taxpayer as well as the Revenue. Similarly, Forms 10B and 10BB require appropriate examination and verification of the accounts and other relevant records of eligible entities.

Adequate time is therefore essential to ensure that the reports are accurate, complete and based upon properly verified information.

An unduly compressed timeline may increase the risk of inadvertent errors, omissions or incorrect disclosures, which may subsequently result in notices, rectification proceedings, unnecessary correspondence and avoidable litigation.

9. Extension would improve the quality of compliance

Since as already mentioned that the due date of non audit cases was 31 st August 2026 Hence only one month effective audit period remain with the business houses as well as professionals and therefore the extention is being sought for. The extension sought by us is not intended to defer or avoid statutory compliance. Rather, it would facilitate **more accurate, complete and properly verified compliance**.

An extension up to 31 October 2026 would provide taxpayers and professionals with reasonable time to:

1. complete the audit of books and financial statements;
2. obtain and verify supporting documents and confirmations;

3. reconcile books with GST, TDS/TCS and Income-Tax portal information;
4. incorporate the applicable disclosures in the prescribed audit reports;
5. address validation and technical issues in the utilities;
6. complete review and quality-control procedures; and
7. file the consequential Income-Tax Returns accurately and within the extended timeline.

Such an extension would ultimately serve the interests of the Revenue by improving the reliability and quality of information furnished to the Income-Tax Department.

10. Relief sought

In view of the facts and circumstances stated above, we most respectfully request that the competent authority may kindly consider the following reliefs:

(a) The due date for furnishing Tax Audit Reports in **Form Nos. 3CA/3CB along with Form 3CD** for Assessment Year 2026–27 may kindly be extended from **30 September 2026 to 31 October 2026.**

(b) The due date for furnishing audit reports in **Form Nos. 10B and 10BB**, wherever applicable, may kindly be extended up to **31 October 2026.**

(c) The due date for filing the **consequential audited Income-Tax Returns** may suitably be aligned with the extended due date so that taxpayers are not placed under an artificially compressed period between completion of the audit report and filing of the return.

(d) Appropriate consequential relief may also kindly be granted in respect of **interest, late-filing consequences, penalties and other adverse implications**, to the extent arising solely on account of the existing compressed compliance timeline.

11. Prayer

In view of the genuine, widespread and practical difficulties explained hereinabove, we earnestly request the Hon'ble Finance Minister, the Central Board of Direct Taxes and the concerned authorities to consider this representation sympathetically and issue the necessary notification, circular or appropriate directions at the earliest.

Since the existing due date of **30 September 2026 is fast approaching**, we respectfully request that the proposed extension up to **31 October 2026** may kindly be granted on an urgent basis.

We reiterate that the relief sought is intended not to dilute statutory compliance but to ensure that the compliance is undertaken **accurately, completely and after proper audit and verification**. A reasonable extension would reduce avoidable errors and litigation, facilitate orderly filing and enable the Revenue to receive more reliable and properly verified information.

We trust that the Government will take a sympathetic and practical view of the genuine difficulties faced by taxpayers and tax professionals and grant the requested extension in the interest of fairness, accurate reporting and efficient tax administration.

We shall be highly obliged for your kind and favourable consideration of this genuine representation.

Thanking you,

Yours faithfully,

For Bikaner Tax Consultants Association

Name: DEEPAK VYAS ADVOCATE
PRESIDENT

CA MAN MOHAN MODI
SECRETARY

Place: Bikaner, Rajasthan
Date: 15 September 2026