

## Changes and Compliances in GSTR 9 & 9C-FY 2024-25

### Introduction

This article aims to provide clarity on the filing of annual returns (Form GSTR 9) and reconciliation statement (Form GSTR 9C) along with required reconciliations, best practices, advanced issues & solutions and tips as applicable for financial year (FY) 2024-25.

**Due date – 31<sup>st</sup> December 2025.** *The due date is not expected to be extended this year despite the extension for tax audits to 31<sup>st</sup> October 2025.*

Govt. changes w.r.t GSTR 9 & 9C FY 24-25:

- NN 13/2025-CT dated 17<sup>th</sup> September 2025
- Updated Form GSTR 9 & GSTR 9C available in CBIC portal (GST > Forms > Returns)
- FAQ on GSTR 9/9C for the FY 2024-25 by GSTN

### Reconciliations required:

1. Turnover - Audited Financial Statements (AFS/Books) vs Table 5A (consider all GSTINs)
2. Table 5N Vs Table 17 – As table 17 is now mandated, this reconciliation could be an internal check mechanism.
3. Outward taxes – Liability as per Books Vs Liability as per GSTR 3B + DRC-03 (if any) [ensure RCM liability is included]
4. Outward taxes – Rate wise liability as per workings Vs Rate-wise Liability as per books
5. GSTR 1 Vs GSTR 3B (*This will help update GSTR 9 easily*)
6. Inward taxes – Credit as per books Vs Credit as per GSTR 3B to identify excess claim of ITC, if any and missed out ITC to claim before 30<sup>th</sup> November 2025 through October 3B returns.
7. ITC reconciliations as follows (linked to table ITC availed - 4.A; ITC reversed 4.B & Net ITC – 4.C):
  1. ITC of previous year disclosed in current year
  2. ITC of current year disclosed in current year
  3. ITC of current year disclosed in subsequent year  
*Invoice level + reconciliation with GSTR 2B.*
8. Closing balance [Cash + Credit] – Books Vs GST portal (consider all GSTINs)
9. Verify and provide for Spill over transactions of previous FY and maintain tracker for next FY
10. Identify rectification and modifications done beyond 30<sup>th</sup> November timeline. (Revised from 20<sup>th</sup> September).

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### ***Form GSTR 9 – Annual Returns***

1. Table 6 – Segregation of ITC claimed in respect of previous year and ITC pertaining to current year (Table 6A(1) and 6A(2)).
2. Table 6H – Changes in reporting of reclaimed ITC:
  - First time claim to be reported in 6B. Reversal in Table 7 and Reclaim in Table 6H.
  - ITC reversed due to Rule 37 or 37A in earlier years (upto FY 2023-24) and reclaimed in FY 24-25 to be reported in 6H.
  - Any other ITC reversed in earlier year but claimed in current year to be reported in 6A(1).
3. Separate reporting of ITC-02 in Table 6M. Wordings modified, can no longer be used as a residuary ITC cell.
4. Table 7A1 & 7A2 – ITC reversals as per Rule 37 (180 day vendor payment) & Rule 37A (vendor GSTR 3B filing status) disclosures added in annual returns format.
1. Table 7 - All ITC reversals to be disclosed separately. Cannot be consolidated under Table 7H from FY 24-25 onwards.
2. Table 8A will be based on table 6B only from FY 2024-25 onwards. ITC reclaimed will not be reported in Table 8B, delinked from table 6H. Also, this table depicts ITC as per table 3(I) of Form GSTR 2B (from FY 23-24).
3. Table 8H1 introduced – ‘IGST Credit availed on Import of goods in next financial year’ to help bifurcate ITC reconciliation on import of goods in table 8.
4. Table 6J & table 8I – Difference calculations are modified to keep the effect of above changes. Table 6J is suggested to be maintained as zero.
5. Table 9 will now have upfront reporting of the difference between tax payable and tax paid. To ensure clear reasons for positive variance and payment proof for negative variance.
6. Tables 10, 11, 12, and 13 have undergone cosmetic changes, i.e. ‘Particulars of the transactions for the financial year declared in returns of the next financial year till the specified period’.
7. Table 12 & 13 are now mandatory – ITC of FY 24-25, claimed and reversed in GSTR 3B of FY 25-26 (before 30<sup>th</sup> Nov.)
8. Payment of additional tax liability – Form GSTR 9 earlier mentioned to be paid in cash, now allows utilisation of input tax credit. Although, GST portal allowed credit utilisation in line with GST law.

*The relaxations that remain from the past are as follows:*

9. Table 4 - Amendments, credit notes and debit notes cannot be shown as net figures in B2B, B2C, etc. now. Table 4I to 4L to be disclosed separately from FY 21-22

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10. Table 5 - Exempted & Nil-rated can be consolidated in 'Exempted' column or shown separately. Table 5F - Non-GST to be shown separately from FY 21-22 onwards
11. Table 17 - HSN outward details mandated from FY 2021-22 onwards. (GSTR 1 (table 12) consolidated data can be used for table 17).
12. HSN disclosures to be performed at 6-digit level (when T/o > Rs. 5 crore) and 4-digit level (when T/o < Rs. 5 crore for B2B only)
13. Clarification that disclosures in GSTR 1 tables 9A, 9B & 9C must be disclosed in table 10 & 11 of GSTR 9.
14. Table 5 - Amendments, credit notes and debit notes can be shown as net figures in table 5.
15. Table 6 - ITC bifurcation into 'inputs'/'input services' not mandatory, total value can be consolidated under 'Inputs'. From FY 2019-20 - under 'Inputs' & 'Capital Goods'.
16. Table 6 - May consolidate ITC under RCM from registered and un-registered persons under registered persons' table.
17. Part V - Reversal/Availment of ITC in previous year may not be filled (T12 & T13)
18. Table 15, 16 & 18 - Refund details, Info on inward supplies & deemed supply, HSN inward details remain optional.

Clarification on Outward Supply disclosures:

19. Table 4G1 & 5C1 - E-commerce operator supplies liable under section 9(5) –Source of info - GSTR 1 - table 14(b), 15 & table 3.1.1.ii & i - GSTR 3B [ECO & Supplier respectively].
20. Consider return filing w.r.t GSTR 1A where applicable (along with GSTR 1).
21. HSN Table 17 - advances and schedule III items must not be disclosed here.
22. Outward supply of FY 23-24 disclosed in GSTR 3B of FY 24-25, where shown in GSTR 9 FY 23-24 in table 10 or table 11 – Should not form part of table 4 or 5 of GSTR 9 FY 24-25. *[short/excess taxes paid in 23-24 adj. in 24-25]*
  - Reason – already disclosed and reconciled in GSTR 9 & 9C of FY 23-24
  - Impact – Table 9 of GSTR 9 FY 24-25 would show this positive variance (not compensatory in nature)
23. Credit Note raised in FY 23-24 disclosed in GST returns of FY 24-25, where shown in GSTR 9 table 4 of FY 23-24 – Should not form part of table 4 or 5 of GSTR 9 FY 24-25.
  - Reason – already disclosed and reconciled in GSTR 9 & 9C of FY 23-24
  - Impact – Table 9 of GSTR 9 FY 23-24 (tax payable is <), in FY 24-25 (tax payable is >) would show this variance (compensatory in nature).

ITC disclosure in GSTR 9:

To understand the disclosures appropriately, following tables have been created. The disclosures are dependent on whether the ITC has undergone a temporary reversal or not. The reason for differentiation is due to double disclosure in table 4.A of GSTR 3B leading to double disclosure in table 6A of GSTR 9.

ITC claimed directly in GSTR 3B (no reversals)

| <u>Invoice date</u> | <u>GSTR -2B</u> | <u>GSTR-3B claim</u> | <u>GSTR 9 FY 24-25</u>                                  |
|---------------------|-----------------|----------------------|---|
| FY 24-25            | FY 24-25        | FY 24-25             | <b>table 6B</b>   |
| FY 24-25            | FY 24-25        | FY 25-26             | <b>table 8C &amp; 13, 6A1 of 25-26</b>                  |
| FY 24-25            | FY 25-26        | FY 25-26             | <b>table 8C &amp; 13 only<sup>1</sup>, 6A1 of 25-26</b> |
| FY 23-24            | FY 24-25        | FY 24-25             | <b>table 6A1<sup>2</sup></b>                            |
| FY 23-24            | FY 23-24        | FY 24-25             | <b>table 6A1<sup>3</sup></b>                            |
| FY 25-26*           | FY 24-25        | FY 25-26             | <b>Table 8C<sup>4</sup>, 6A1 of 25-26</b>               |

ITC claimed directly in GSTR 3B (with temp. reversals)

| <u>Invoice date</u> | <u>GSTR -2B</u> | <u>GSTR-3B claim</u> | <u>GSTR-3B re-claim</u> | <u>Annual returns Disclosures</u>                                       |
|---------------------|-----------------|----------------------|-------------------------|---|
| FY 24-25            | FY 24-25        | FY 24-25             | FY 24-25                | <b>24-25 table 6B, 6H, t7</b>   |
| FY 24-25            | FY 24-25        | FY 24-25             | FY 25-26                | <b>24-25 table 6B &amp; t7<br/>25-26 table 6A1<sup>2</sup></b>          |
| FY 24-25            | FY 25-26        | FY 25-26             | FY 25-26                | <b>24-25 table 8C &amp; t13<sup>1</sup><br/>25-26 table 6B, t6H, t7</b> |
| FY 23-24            | FY 24-25        | FY 24-25             | FY 24-25                | <b>24-25 table 6A1, t6H, t7</b>   |
| FY 23-24            | FY 23-24        | FY 24-25             | FY 24-25                | <b>24-25 table 6A1, t6H, t7</b>   |
| FY 24-25            | FY 25-26*       | FY 24-25             | FY 25-26                | <b>24-25 table 6H &amp; t7<sup>4</sup><br/>25-26 table 6A1</b>          |

*1 - Even though not part of GSTR 2B of FY 24-25, it forms part of table 8A of FY 24-25, GSTN FAQ on GSTR 9 clarifies accordingly.*

*2 - Even though it is part of GSTR 2B of FY 24-25, it will not form part of table 8A of FY 24-25, GSTN FAQ on GSTR 9 clarifies accordingly.*

3 – Annual return has been modified. ITC will be bifurcated between past and current year. Such values may include temporary ITC reversed and reclaimed, but, must not include ITC re-claimed under Rule 37 (180 days) and Rule 37A (vendor 3B filing).

\* - Invoice dated FY 24-25 but accounted in FY 25-26 (books only).

4 – ITC must be claimed based on GSTR 2B. Disclose in table 8C as such entry would not display in GSTR 9 - table 8A of FY 25-26.

#### Note-1: ITC Reversal disclosures –

When temporarily reversed – use table 7H (modify text - ‘temp reversal’)

When temporarily reversed u/R 37, 37A & 38 – use 7A, 7A1 & 7A2 resp.

When permanently reversed – use appropriate table – 7C, 7D, 7E

#### Note-2: Internal check –

- Table 8C of previous year matches to Table 6A1 of next year
- Table 4D(1) of GSTR 3B for FY 24-25 = Table 6H + Table 6A1

#### Open issues:

Previous year ITC re-claimed and reversed in GSTR 3B – This will create a variance in table 7J as the total formula includes table 6O and reversals in table 7, although does not include table 6A1, i.e. ITC re-claimed w.r.t past period.

Table 7J is linked to Form GSTR 9C, where ITC reconciliations with books of accounts also would lead to a mismatch due to incorrect value here. Solutions:

- Type 1) Disclose such re-claim in 6A1 and do not disclose such reversals in table 7 to avoid mismatch in table 7J. *[improper disclosure of t7]*
- Type 2) Disclose such re-claim in 6A1, reversal in table 7 which would lead to a mismatch in table 7J. Raise a ticket (grievance redressal) for apparent mismatch and include reasons for difference in table 13 of GSTR 9C. *[proper disclosure leads to variance]*
- Type 3) - Disclose such re-claim in table 6H instead of 6A1 and disclose the permanent reversal in table 7 (respectively). This will ensure Table 7J net ITC matches table 4C of GSTR 3B and would result in appropriate disclosure in GSTR 9C. *[improper disclosure of t6H]*

#### Table 6M – Balancing / Residuary cell

T6M can no more be utilised as a balancing figure to disclose temporary reversals, supplier credit notes, etc. Only ITC arising out of Form ITC-01, 02, 02A can be disclosed here. *[other*

than thru GSTR 3B]. Where, T6M is disclosed per law, table 7J internal check to table 4C of GSTR 3B would vary to such an extent.

#### Table 6H utility – FY 24-25 onwards

- To disclose ITC re-claimed in the same FY (once in 6B and once in 6H)
- To disclose ITC re-claimed of past periods under Rule 37 & 37A
- To disclose ITC claimed and temporarily reversed but not reclaimed within prescribed timelines. (Appearing in GSTR 2B but not in books)
  - Avoiding a disclosure in table 6B, would help bring out a difference in table 8, leading to disclosure in table 8E/8F – ITC available but not availed/ineligible.

#### Supplier Credit Notes in GSTR 9 -

The following situations may arise:

- Supplier credit note raised to cancel out invoice – net impact in GSTR 2B – Nil.
- Supplier credit note raised, acceptable to recipient – ITC would be reversed in GSTR 3B. Net value may be disclosed in table 6B. Avoid T7 disclosure to ensure table 8 (2B reco) is more accurate.
- {Open issue} - Supplier credit note raised, not acceptable to recipient – Do not consider disclosure in table 6, reconciliation difference would arise in table 8 (2B reco). Ensure appropriate documentation is maintained for the same.

#### Changes in Table 8

##### Table 8A details –

- Contains - ITC of invoices pertaining to FY 2024-25 appearing in GSTR 2B of FY 2024-25
- Contains - ITC of invoices pertaining to FY 2024-25 appearing in GSTR 2B of FY 2025-26
- Does not contain - ITC of invoices pertaining to FY 2023-24 appearing in GSTR 2B of FY 2024-25

*Note – Therefore, table 8A would static (unchanged) as on 1<sup>st</sup> December 2025. Ensure Annual returns are filed post such date only.*

#### Domestic ITC –

Table 8C , i.e. GSTR 2B credit of current year claimed in the next year – due to implementation of table 6A1 the utility of this table is reduced. Better understood by way of an illustration:

ITC of FY 24-25 (2B) re-claimed in FY 25-26 (3B)

Such credit was claimed, temporarily reversed in FY 24-25 and finally re-claimed in FY 25-26 (within time limit)

*Disclosure in GSTR 9 FY 24-25: Table 6B, Table 6H & Table 7H (temp rev.)*

*Disclosure in GSTR 9 FY 25-26: Table 6A1*

#### Imported Goods –

Additional table 8H1 has been introduced to disclose ITC w.r.t imported goods disclosed in GSTR 2B of current year but claimed in the next financial year.

Previously, the ITC disclosure was matched to GSTR 2B irrespective of actual credit claimed to avoid possible dispute of ITC on import of goods.

*Note – Time limit u/s 16(4) disputable on 'bill of entry' document. Applies to 'invoice and debit note' only.*

#### Important information:

- ❖ Taxpayers need not file annual return in FORM GSTR-9/9A for FY 2024-25 if their aggregate annual turnover is up to Rs. 2 crores. (If 9 not filed, 9C not required)
- ❖ Taxpayers having turnover more than Rs. 5 crores are required to file GSTR 9C. Therefore, those persons between Rs. 2 crore & Rs. 5 crores need not file Form GSTR 9C but require filing GSTR 9.
- ❖ Liability as per table 4 (incl. Adjustments in table 10 & 11) must be considered as final liability (as per books) irrespective of liability disclosed in GSTR 3B + Form DRC-03 during the FY.
- ❖ Time period for transactions of previous year disclosed in next financial year until specified period means details disclosed for FY 2024-25 up to 30<sup>th</sup> November 2025.
- ❖ Rule 42 - Annual re-computation of ITC reversal for the FY - deadline is September month, i.e. where GSTR 3B is due by 20<sup>th</sup> October.
- ❖ Payments to be made through Form DRC-03. Utilization of ITC is now allowed.
- ❖ As ITC claim and matching of credit is being checked via GSTR 2B Vs GSTR 3B vide Form DRC-01C, any notices raised based on table 8 disclosure of GSTR 9 would not seem relevant and appropriate anymore.
- ❖ Late fees for annual returns incl. reconciliation statement are applicable only once, i.e. if both returns or either GSTR 9 or GSTR 9C are delayed beyond the due date, late fees would be collected only once. Relevant changes in GST portal are expected in this regard. Waiver of late fee based on turnover is provided in NN 07/2023-CT dtd 31.3.23.

- ❖ GST portal has enabled Form GSTR 9 & Form GSTR 9C for FY 24-25 in the GST portal, table 8A vs GSTR 2B check may be warranted. If T8A is NIL in the portal, raise a grievance for the same, alternatively, it may reflect as on 1<sup>st</sup> December 2025 only.

### ***Form GSTR 9C – Reconciliation Statements –:***

1. Table 7D1 introduced – Supplies on which tax is to be paid by ECO as per s9(5) [Supplier to report], as it would not form part of taxable turnover.
2. Table 9K2 introduced - Supplies on which tax is to be paid by ECO as per s9(5) [ECO to report]
3. Table 5B – Turnover reconciliation – Unbilled Revenue at the beginning of the year can be merged and disclosed in table 5O.
4. Other Turnover reconciliations from table 5C to 5N – Must be disclosed separately and cannot be clubbed under Table 5O. Earlier, relaxation was available till FY 2021-22 as single disclosure in table 5O.
5. Table 12B & 12C – No more optional, mandated to disclose such ITC details from FY 2023-24 onwards.
6. Table 14 – Remains optional to fill expense wise ITC claim details (this may also be available from disclosure in clause 44 of Tax Audit Form 3CD).

*Note-1: Pre-requirement to 9&9C – all GSTR 1 & GSTR 3B for FY 2024-25 must be filed*

*Note-2: Form GSTR 9 & GSTR 9C – once filed cannot be revised. (suggested to file together)*

### ***Advanced Issues & Solutions***

1. **IMS – impact in GSTR 9** – IMS although introduced from November 2024 in the GST portal, was brought into GST law only from October 2025.
  - a. Credit note rejection – This would lead to additional liability and possible manual correction in GST returns in case such rejection was improper. (similarly, would apply to B2BA/CAN downward amendment and CN upward amendment)
  - b. Credit note in 2B but not in books – ITC was not reduced in GSTR 3B. This would lead to table 8 mismatches. Reasons for variance to be clearly documented.
  - c. Credit note in books but not in 2B – ITC was reduced in GSTR 3B. Such a disclosure is appropriate, table 8 would show a higher 2B value. Reasons for variance to be documented.
  - d. Pending ITC unclaimed – Such ITC would be time barred u/s 16(4) unless claimed within 30<sup>th</sup> November in GSTR 3B. Keeping ITC pending in IMS does not overcome time limit.

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2. **Rule 37A compliance** – Ensuring vendors’ file their GSTR 1 correctly is not sufficient anymore, vendors’ must also file their GSTR 3B to ensure ITC is eligible to the recipient (rule 37A introduced in Dec ’22 r/w s 16(2)(c)), GSTR-2A provides the status of vendor 3B filing status. ITC reversed under this rule can be claimed once vendor files the GSTR 3B. It can be disclosed under table 7A1. Such reversals practically are rare due to implementation of GSTR 1 filing only after GSTR 3B filing and automated form DRC-01B.
3. **Credit Note disclosures** – The wordings in table 4 of GSTR 9 is confusing as the heading is transactions for the year, whereas, CN raised against invoices above leads to an interpretation where CNs raised in the next financial year (within timelines) could be considered. In our view, CNs raised in next financial years must be disclosed in such period as it is not a transaction of the previous financial year.
4. **Tackling Deferred ITC ledgers** – After the restriction on ITC claim based on GSTR 2B reflection, many eligible ITC may not have been claimed and maintained in deferred ledgers. The disclosures for the same must be considered in Table 13 of GSTR 9 to the extent claimed in 1<sup>st</sup> Apr- 30<sup>th</sup> Nov 25 period. In GSTR 9C - Table 12A to include entire ITC as per books, table 12C can be matched with GSTR 9 table 13 figures. Similarly additional disclosures in the next financial year would be in table 6A1, 6B and 6H of GSTR 9, and Table 12B of GSTR 9C.
5. **Table 8C Vs Table 13 in GSTR 9** - The reasons for differences would be:
  - a. Table 13 consists of ITC on imports & inward supplies liable to reverse charge which must not be disclosed in 8C.
  - b. Goods/services in transit would need to be disclosed in table 8C but not in table 13. (those invoiced in current FY, but goods/services received and accounted in next FY)
  - c. Invoices accounted for the current FY, but appeared in GSTR 2B and claimed in GSTR 3B in the next FY. This would be disclosed in table 13 only.
6. **Table 8K – Lapsed ITC - analysis** – ITC to be lapsed does not specifically mean that such ITC will be reduced from electronic credit ledger directly. This is only an indication to the dept. for settlement purposes. (clarified in July 2019 press release). Although, with recent changes in ITC tables in FY 24-25, it may indicate revitalized utilization of table 8K.
7. **Negative ITC in table 4C of GSTR 3B** – The negative ITC (meaning tax liability) in table 4C of Form GSTR 3B will ensure in table 9-GSTR 9 such amount is considered in tax paid although such values would not reflect automatically. To this end, reasons for variance in table 9 can be maintained without any such adjustments.  
Alternatively, where manual addition is done in table 9 (tax payable) to ensure reconciliation, it would also impact similar disclosures in table 9 of GSTR 9C.

8. **Table 7E vs Table 9 of GSTR 9C** – Although this is not a mandated reconciliation, this check ensures that the taxable value as per books (considered rate wise) matches to the taxable value as reconciled in the previous tables. Verifies taxes calculated as per books is appropriate. Ensure that table 9 of GSTR 9C is filled only as per books irrespective of disclosure in GSTR 3B or GSTR 9.
9. **Additional liability disclosures**
- Outward & RCM liability – this may be disclosed for the first time in table 4 of GSTR 9, which would display in table 9 which should be supported by a DRC-03. Alternatively, where accounted but missed, may be disclosed directly in GSTR 9C table 9 – mismatch with reasons having DRC-03 reference.
  - ITC reversal/excess claim – this may be disclosed in table 7 of GSTR 9. Manual addition to tax payable in table 9 of GSTR 9 may not be required where it forms part of mismatch in table 12F of GSTR 9C. Reasons for difference may be supported with DRC-03 reference.
  - Alternate option – Use Pt V of GSTR 9C – ‘Additional liability due to non-reconciliation’.

### **Best Practices & Tips:**

- Maintain 9 & 9C workings with links to all the relevant data. Avoid keyed-in workings.
- Perform invoice level reconciliations - A very beneficial exercise to taxpayers, which will help not only in the process of filing the annual returns but also to identify the errors and provide info to department in the future.
- Maintain separate details of ITC claimed, reversed, and re-claimed if the taxpayer fulfils the conditions mentioned u/s 16.
- In case of amendments, outward register to be maintained with original values, so that it will be helpful while table 4 & 5 of GSTR 9.
- Invoice level GSTR 2B Vs ITC as per books reconciliation is to be performed for Table 8 disclosure in GSTR-9.
- Credits as per books – unclaimed due to non-matching with GSTR 2B. Pass as expense in books of accounts of FY 2024-25 and verify option of recovery from continuing vendors.
- Providing an “Annual GST - Management Report” which may consist of the following:
  - ❖ Folder with final workings and filed Form GSTR 1, 3B, GSTR 9 & 9C for the FY.
  - ❖ Reconciliations for the FY – Outward, Inward & RCM – birds eye view
  - ❖ Reasons for variances and action taken (summarily)
  - ❖ Where additional liability was noticed – summary details + payment documentation
  - ❖ Suggestions on internal accounting/processes/reporting going forward

**Conclusion**

The activity of filing Form GSTR 9 & 9C with the recent changes has become even more complex although it is expected to show the final values (with corrections if any) for a financial year appropriately. The department is also using this as a document for scrutiny. Therefore, using tools/software and procedures to ensure accurate data is extrapolated is imperative. Availing the services of expert professionals may help resolve various non-compliances made inadvertently and gain insights into data documentation and availability.

*I acknowledge CA Mahadev's contribution to this article.*

*Revised version (v2).*

*Views expressed in this article are personal, not to be construed as legal opinion.*