



# THE INSTITUTE OF CHARTERED ACCOUNTANTS OF INDIA

## GST & INDIRECT TAXES COMMITTEE

Webinar on  
**Invoicing, Credit & Debit Notes: Practical Insights**

Date: 05-08-2025

By **CA Rishabh A Parikh**

**FCA, MCom(F&T), DISA(ICAI), PGD(GST), BCom, Social Auditor**



# Introduction

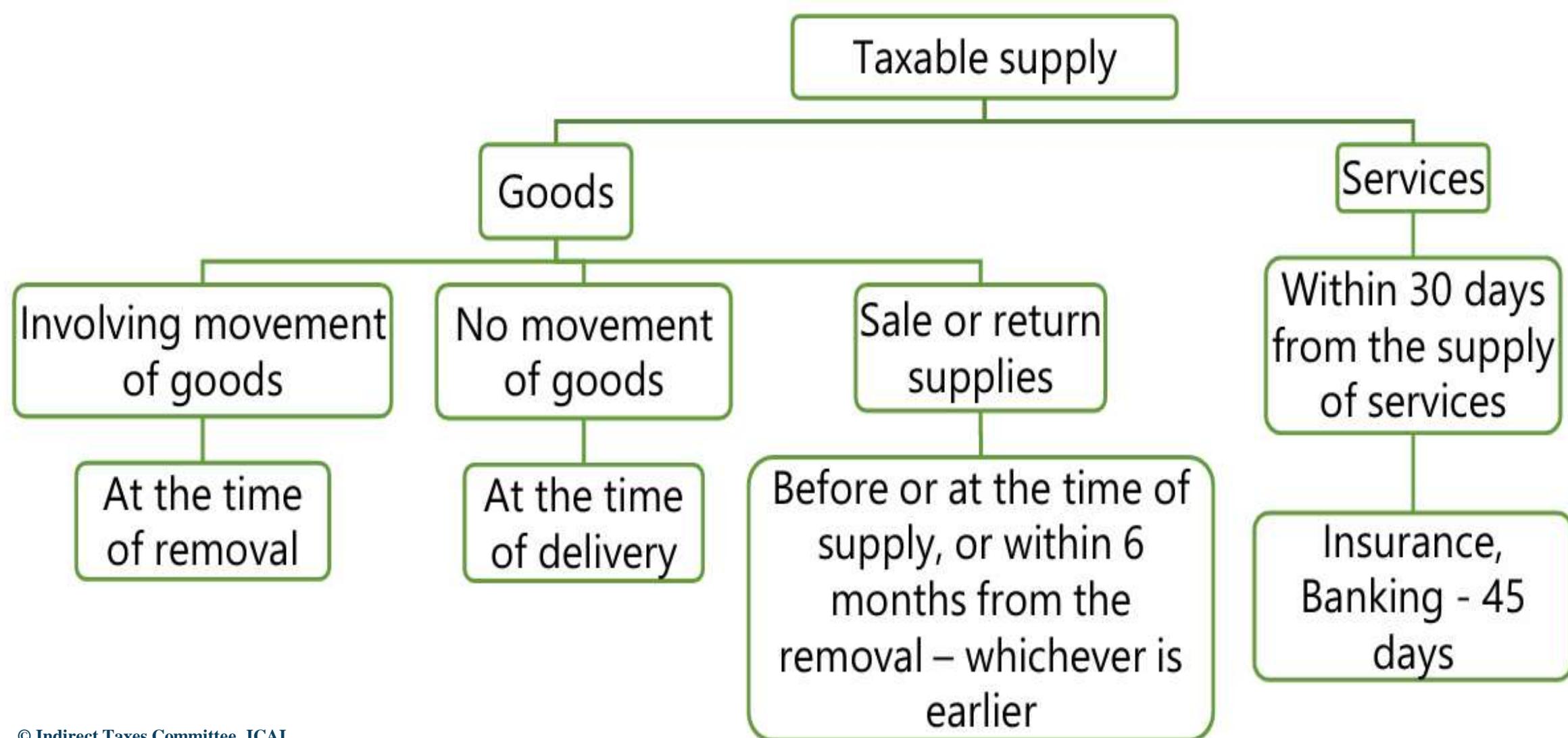


Thank You!

- GST is a **document-based regime**.
- Every transaction should be supported by at least one of the documents specified in GST law.
- In case any supply is done without creating the requisite document, it may lead to penalty & prosecution u/s 122 & 132 respectively of the CGST Act.
- The tax invoice is the basic document for the movement of goods, evidence of supply of taxable goods or services or both and also for claiming of ITC on receipt of relevant goods or services or ITC availed and utilized or claiming of refunds of tax so paid.



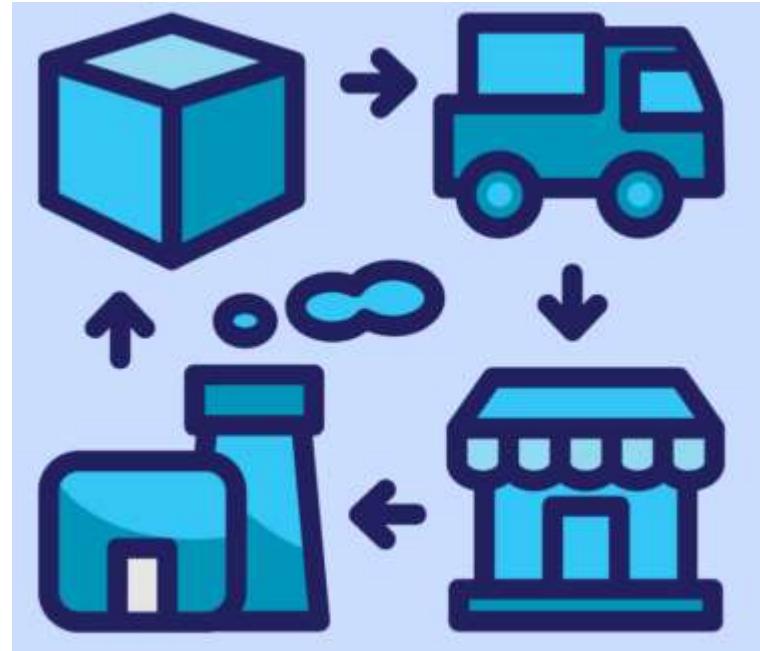
# Tax Invoice – Section 31





# Continuous Supply of Goods

4



As per section 2(32), 'continuous supply of goods' means

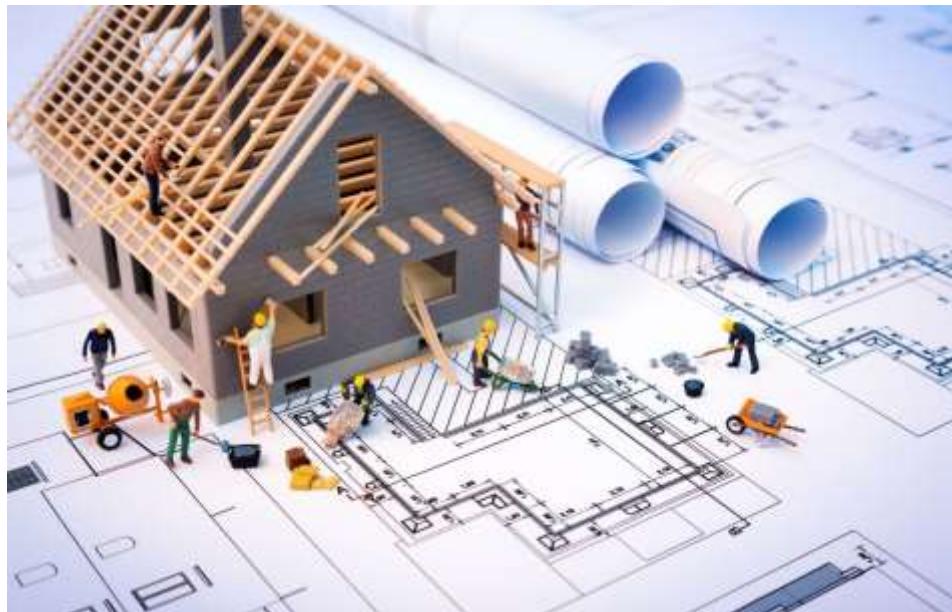
- supply of goods which is provided or agreed to be provided:
- continuously or on recurrent basis;
- **under a contract;**
- it may or may not be by means of a wire, cable, pipeline or other conduit;
- the supplier sends invoice to the recipient on regular or a periodic basis as notified.

In case of  
continuous supply of goods

- before/at the time each successive statements of accounts is issued or each successive payment is received



# Continuous Supply of Services



In case  
continuous  
supply  
services  
of  
of

As per section 2(33), “Continuous supply of services” means –

- Supply of services which is provided or agreed to be provided continuously or on recurrent basis; **under a Contract**;
- **for a period exceeding 3 months**;
- with periodic payment obligations as mentioned in the contract;
- and includes other supply of services as notified.

due date of payment is ascertainable from the contract	on/before due date of payment
not so ascertainable	before/at the time of receipt of payment
payment is linked to the completion of an event	on/before the date of completion of that event



# Hybrid Annuity Model Contracts

6

**Circular No. 221/15/2024 GST dated 26.06.24**



- A HAM contract is a single contract for construction as well as operation and maintenance of the highway which generally, covers a period of 15-17 years and the payment is spread over the years.
- Payment terms for the construction portion as well as the O&M portion of the contract are provided in the agreement between NHAI and the contractor.
- The same appears to be covered under the ‘Continuous supply of services’ as defined under section 2(33) of the CGST Act.
- As the installments/annuity payable by NHAI to the concessionaire also includes some interest component, the amount of such interest shall also be includable in the taxable value for the purpose of payment of tax on the said annuity/installment in view of the provisions of section 15(2)(d) of the CGST Act, 2017.



# Special Cases



- In a case where the supply of services ceases under a contract before the completion of the supply, **the invoice shall be issued at the time when the supply ceases and such invoice shall be issued to the extent of the supply made before such cessation.**

An insurer or a banking company or a financial institution, including NBFC, or a telecom operator, or any other class of supplier of services as may be notified by the Government, making taxable supplies of services between distinct persons as specified in section 25



may issue the invoice

**before or at the time such supplier records the same in his books of account or before the expiry of the quarter during which the supply was made**



# Contents of Invoice – Rule 46

Name, address & GSTIN of supplier	Consecutive Serial Number & date of issue	Name, address & GSTIN of recipient, if registered	Name & address of recipient alongwith delivery address , name & State code, if not registered
HSN	Description of goods or services	Quantity in case of goods	Total Value of supply
Taxable Value of supply	Tax rate – Central tax & State tax or Integrated tax, cess	Amount of tax charged	Place of supply
Address of delivery where different than place of supply	Tax payable on reverse charge basis	Signature of supplier or authorised signatory - not req. if e-invoice issued as per IT Act, 2000	QR code having embedded IRN in it - in case if e-invoice issued



## Notification No. 78/2020 – CT dated 15th October, 2020

Table-12 of GSTR-1

<b>Annual Turnover (AT) in the preceding FY</b>	<b>Number of Digits of HSN Code</b>
AT $\leq$ ₹ 5 crores	For B2B supply - 4 For B2C supply – 4 (optional)*
AT $>$ ₹ 5 crores	For B2B supply and B2C supply – 6



# Manner of issuing the invoice – Rule 48

10

## **Supply of Goods**

### **TriPLICATE**

Original copy for recipient  
Duplicate copy for transporter; and  
TriPLICATE copy for supplier

## **Supply of services**

### **Duplicate**

Original copy for recipient; and  
Duplicate copy for supplier

The serial number of invoices issued during a month / quarter shall be furnished electronically in FORM GSTR-1.

Where e-invoicing is applicable



No need of issuing invoice copies  
in triplicate/duplicate



# E-Invoice –Applicability & Exemption

11

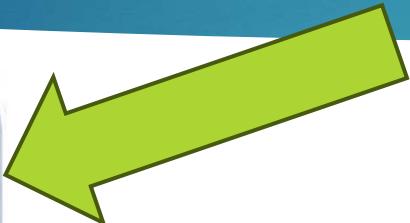
All registered businesses



with an aggregate turnover (based on PAN) greater than ₹ 5 crore



in any preceding financial year from 2017-18 onwards



Required to issue E-invoice



Special Economic Zone units

Insurer/banking company/financial institution including NBFC

GTA supplying services in relation to transportation of goods by road in a goods carriage

Supplier of passenger transportation service

Person supplying services by way of admission to exhibition of cinematograph films in multiplex screens

Government Department and local authority



# Clarification on applicability of e-invoicing w.r.t an entity

12

## **Circular No. 186/18/2022-GST**

Whether the exemption from mandatory generation of e-invoices in terms of Notification No. 13/2020-Central Tax, dated 21<sup>st</sup> March, 2020, as amended, is available for the entity as whole, or whether the same is available only in respect of certain supplies made by the said entity?

In terms of Notification No. 13/2020-Central Tax dated 21<sup>st</sup> March, 2020, as amended, certain entities/sectors have been exempted from mandatory generation of e-invoices as per sub-rule (4) of rule 48 of Central Goods and Services Tax Rules, 2017. It is hereby clarified that the said exemption from generation of e-invoices is for the entity as a whole and is not restricted by the nature of supply being made by the said entity.



# Applicability of e-invoices

13

Supply of goods and/or services to a registered person by notified person [B2B supplies]

•Applicable

Exports by notified persons

•Applicable

B2C supplies by notified persons

•Not applicable

Invoices issued by Input Service Distributor

•Not applicable

Supplies made by notified person, tax on which is payable under reverse charge under section 9(3)

•Applicable

Where specified category of supplies are received by notified persons from unregistered persons [attracting reverse charge under section 9(4)] or through import of services

•Not applicable

Import of goods (Bills of Entry)

•Not applicable



# Clarifications

14

## **Circular No. 160/16/2021 GST dated 20.09.2021**

**There is no requirement to carry the physical copy of tax invoice in cases where e-invoice has been generated by the supplier.**

Whenever e-invoice has been generated, production of the Quick Reference (QR) code having an embedded Invoice Reference Number (IRN) electronically, for verification by the proper officer, would suffice.

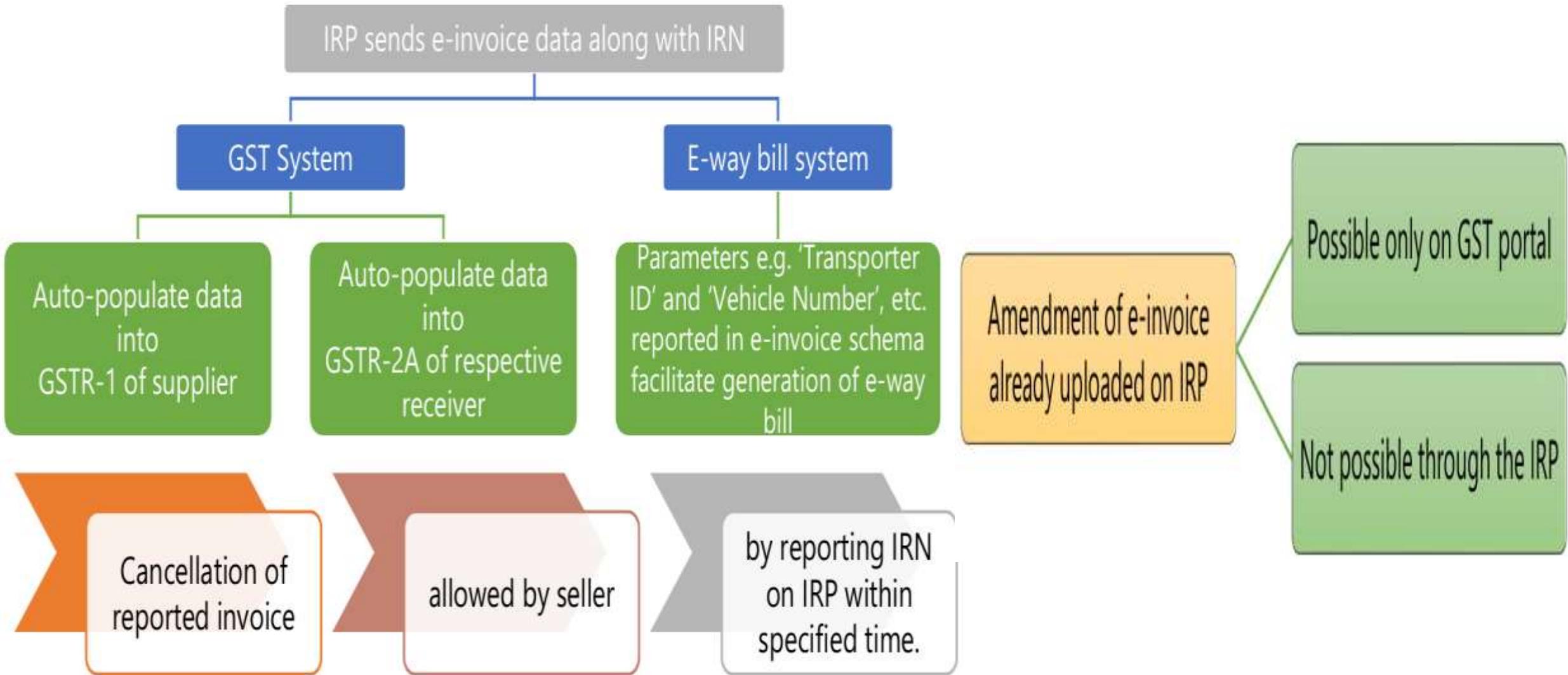
## **Circular No. 198/10/2023 GST dated 17.07.2023**

Registered person whose turnover exceeds 5 Crore, is required to issue e-invoices for the supplies made **TO** such Government Departments or establishments/ Government agencies/ local authorities/ PSUs, etc. under rule 48(4) **even if they are registered solely for the purpose of deduction of TDS as per provisions of section 51.**



# Amendment and Cancellation

15





# Consolidated Tax Invoice

16

## Consolidated Tax Invoice



However, this option **IS NOT AVAILABLE** to a supplier engaged in making supply of services by way of admission to exhibition of cinematograph films in **multiplex screens**.

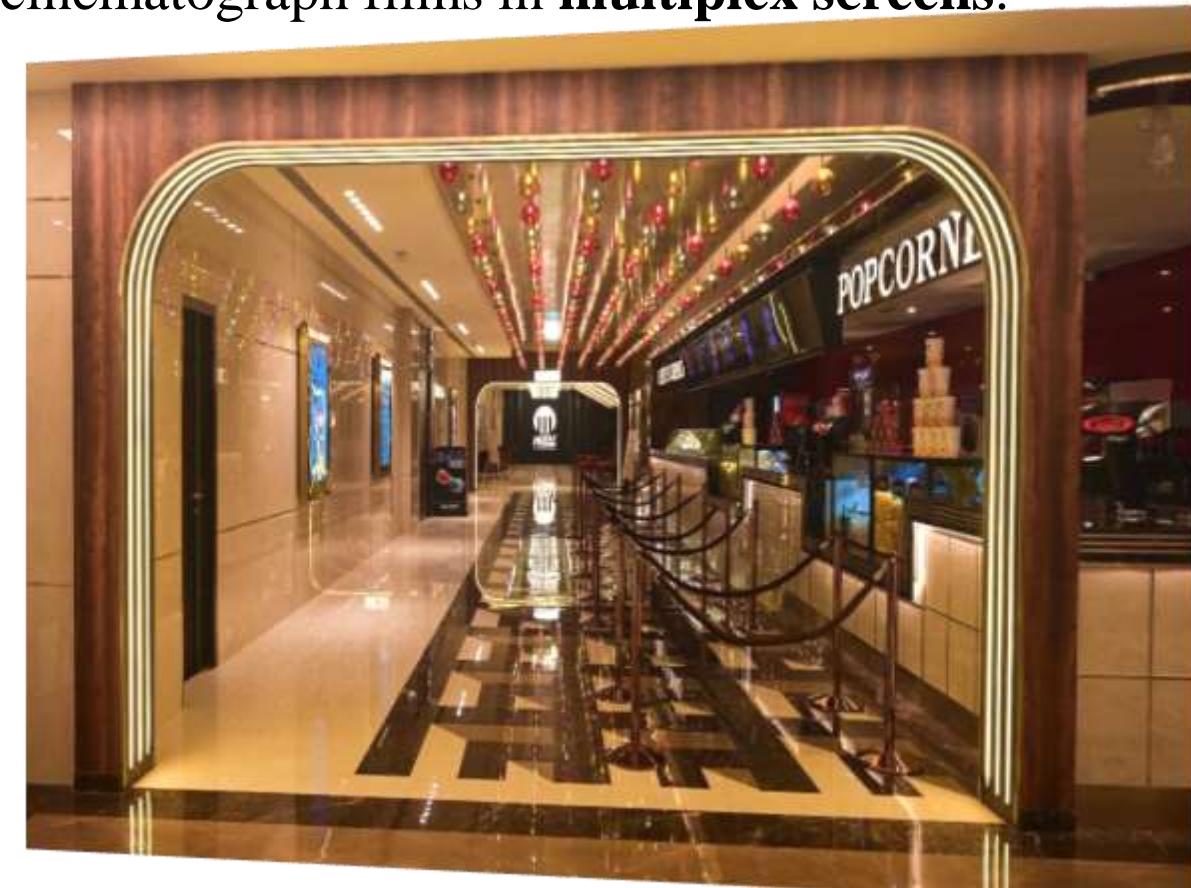
Tax invoice is not required to be issued

Value of supply < ₹200

Recipient is unregistered

Recipient does not require such invoice

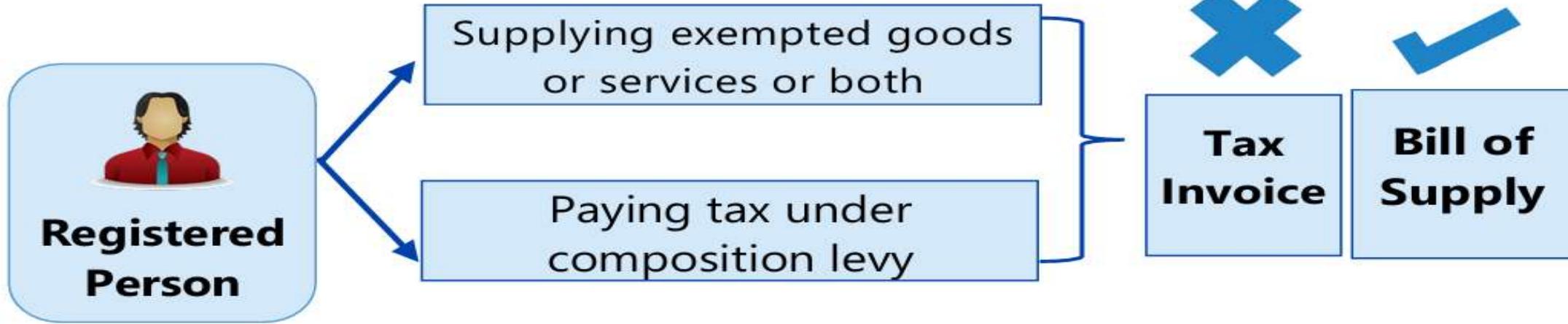
**Consolidated Tax Invoice** shall be issued for such supplies at the close of each day in respect of all such supplies





# Bill of Supply & Receipt Voucher

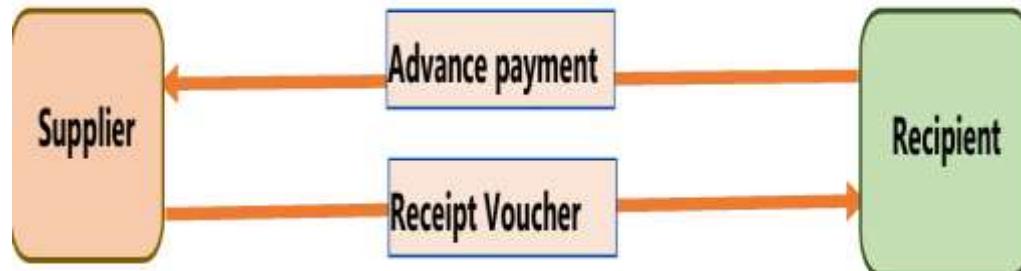
17



## Invoice-cum-bill of supply [Rule 46A]

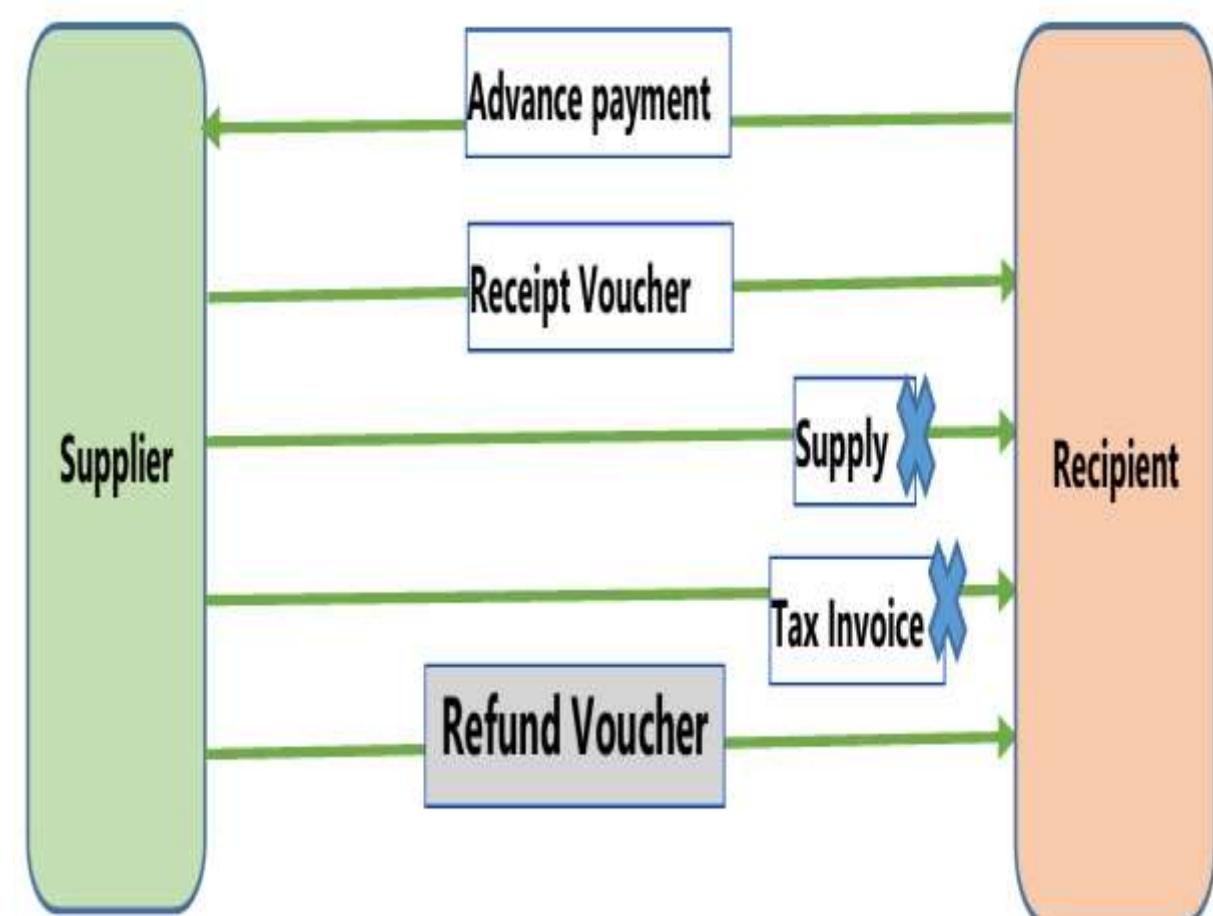
Where a registered person is supplying taxable as well as exempted goods or services or both to an unregistered person, a single “invoice-cum-bill of supply” may be issued for all such supplies.

## Receipt Voucher



- ▶ A registered person shall, on **receipt of advance payment** with respect to any supply of goods or services or both, issue a Receipt Voucher evidencing receipt of such payment.
- ▶ Where at the time of receipt of advance, rate of tax/ nature of supply is **NOT** determinable, **tax shall be paid at the rate of 18%** and same shall be treated as **INTER-STATE SUPPLY**

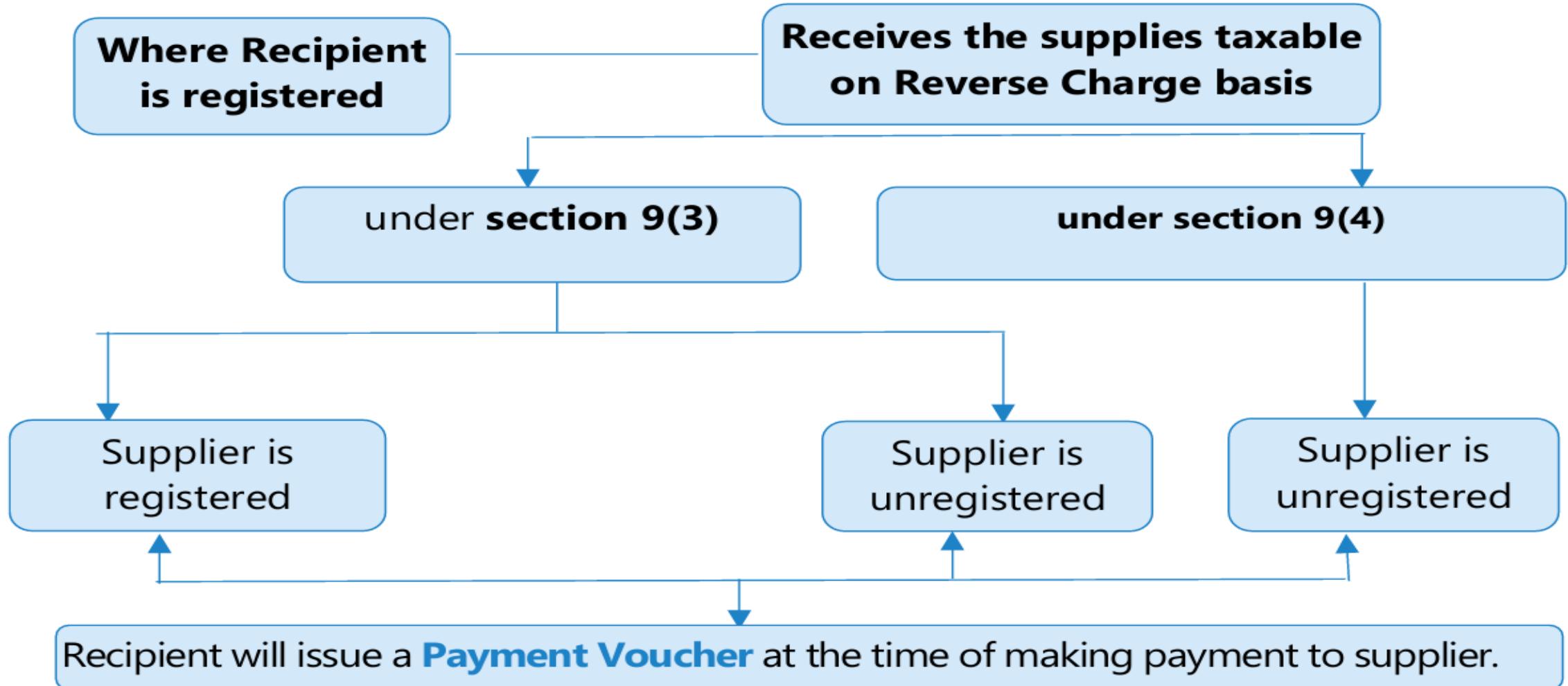
## Refund Voucher





# Payment Voucher

19

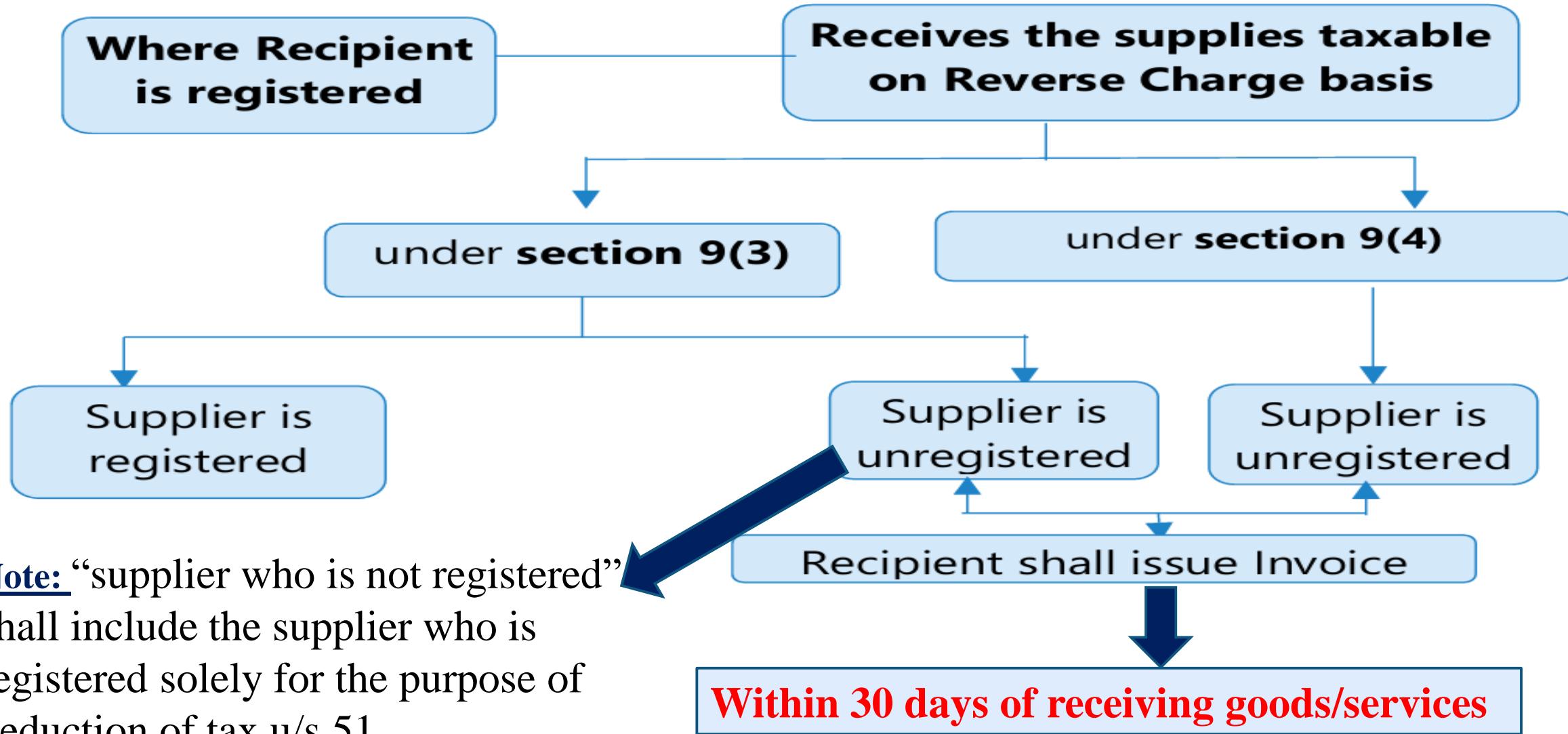




# Self Generated Invoice

## Section 31(3)(f) r/w Rule 47A

20





## Clarification on time limit u/s 16(4) of the CGST Act in respect of RCM supplies received from unregistered person

[Circular No. 211/5/2024 GST dated 26.06.2024]



- The relevant FY for calculation of time limit for availment of ITC u/s 16(4) of the CGST Act will be the FY in which the invoice has been issued by the recipient u/s 31(3)(f) of CGST Act, subject to payment of tax on the said supply by the recipient and fulfilment of other conditions and restrictions of section 16 and 17.
- In case, the recipient issues the invoice after the time of supply of the said supply and pays tax accordingly, he will be required to pay interest on such delayed payment of tax.
- Further, in cases of such delayed issuance of invoice by the recipient, he may also be liable to penal action u/s 122 of the CGST Act.



# Declaration on Invoice for Exports

22



## On Payment of IGST



- Supply meant for export / Supply to SEZ unit/ developer for authorized operations on payment of IGST



## Without Payment of IGST

- Supply meant for export / Supply to SEZ unit/ developer for authorized operations under bond or letter of undertaking without payment of IGST



# Reporting

23

[Dashboard](#) > [Returns](#) > [GSTR-3B](#) > [Outward and Reverse Charge Inward](#)[English](#)

## 3.1 Details of Outward Supplies and inward supplies liable to reverse charge (other than those covered by Table 3.1.1)

[Help](#)

Table 3.1(a), (b), (c) and (e) are auto-drafted based on values provided in GSTR-1. Whereas Table 3.1(d) is auto-drafted based on GSTR-2B.



Nature of Supplies	Total Taxable value (₹)	Integrated Tax (₹)	Central Tax (₹)	State/UT Tax (₹)	CESS (₹)
<b>(a) Outward taxable supplies (other than zero rated, nil rated and exempted)</b>	1,21,650.00	5,679.00	8,364.00	8,364.00	0.00
<b>(b) Outward taxable supplies (zero rated )</b>	0.00	0.00			0.00
<b>(c) Other outward supplies (Nil rated, exempted)</b>	0.00				
<b>(d) Inward supplies (liable to reverse charge)</b>	0.00	0.00	0.00	0.00	0.00
<b>(e) Non-GST outward supplies</b>	0.00				

[CANCEL](#)[CONFIRM](#)



# Invoicing in case of 9(5) -ECO

24

- The Govt may, on the recommendations of the GST Council, notify specific categories of **services** the tax on supplies of which **shall be paid by the ECO** if such services are supplied through it.
- All the provisions of the GST shall apply to such ECO **AS IF HE IS THE SUPPLIER** liable for paying the tax in relation to the supply of such notified services.
- **Example: The INVOICE in respect of restaurant service supplied through ECO u/s 9(5) will be issued by ECO.**
- Liability to pay GST on supplies **OTHER THAN** ‘restaurant service’ through the ECO, and other compliances under the CGST Act, **including issuance of invoice** to customer, **continues to lie with the respective suppliers** (and ECOs being liable only to collect TCS on such supplies), it is advisable that **ECO raises separate bill** on restaurant service in such cases where ECO provides other supplies to a customer under the same order





# Reporting

25

## 3.1.1 Details of supplies notified under section 9(5) of the CGST Act, 2017 and corresponding provision in IGST/UTGST/SGST Acts

Help ?

Description	Total Taxable Value(₹)	Integrated Tax (₹)	Central Tax (₹)	State/UT Tax (₹)	CESS (₹)
(i) Taxable supplies on which electronic commerce operator pays tax u/s 9(5) [to be furnished by electronic commerce operator]	0.00	0.00	0.00	0.00	0.00
(ii) Taxable supplies made by registered person through electronic commerce operator, on which electronic commerce operator is required to pay tax u/s 9(5) [to be furnished by registered person making supplies through electronic commerce operator]	0.00				

CANCEL

CONFIRM



# Invoicing in case of Bill to Ship Model

26



- Where the place of supply is deemed to be the principal place of business of the person on whose direction the goods are dispatched to another person (as specified in section 10(1)(b) of the IGST Act, 2017), **the transaction would have 2 supplies**.
- While **one supply** would be from the supplier to the person to whom the invoice is addressed, **another supply** would be **deemed** to be effected by the said addressee to the person who receives the goods.
- In such a case, the addressee may consider the date of making available of the goods to the ultimate recipient, as the date on which the tax invoice is liable to be issued by him.
- The reason being that in case of supply of goods, invoice is to be issued on or before removal of goods as per section 31(1) and the term removal of goods as defined in section 2(96) of the CGST Act also mean collection of the goods by the recipient thereof or by any other person acting on behalf of such recipient.

## Section 32 –

### Prohibition of Unauthorized Collection of Tax

- ▶ A person who is not a registered person shall not collect in respect of any supply of goods or services or both any amount by way of tax under this Act.
- ▶ No registered person shall collect tax except in accordance with the provisions of this Act or the rules made thereunder.

## Section 33 –

### Amount of Tax to be Indicated in Tax Invoice & Other Documents

- ▶ Notwithstanding anything contained in this Act or any other law for the time being in force, where any supply is made for a consideration, every person who is liable to pay tax for such supply shall **prominently indicate in all documents** relating to assessment, tax invoice and other like documents, **THE AMOUNT OF TAX** which shall form part of the price at which such supply is made.



# Credit Notes in GST – Section 34

28

Where one or more tax invoices have issued for supply of any goods or services or both

Taxable value in invoice  
➢ Taxable value in respect of such supply

Tax charged in invoice  
➢ Tax payable in respect of such supply

OR

where the goods supplied are returned by the recipient

OR

where goods or services or both supplied are found to be deficient

**Registered Supplier of goods or services or both**

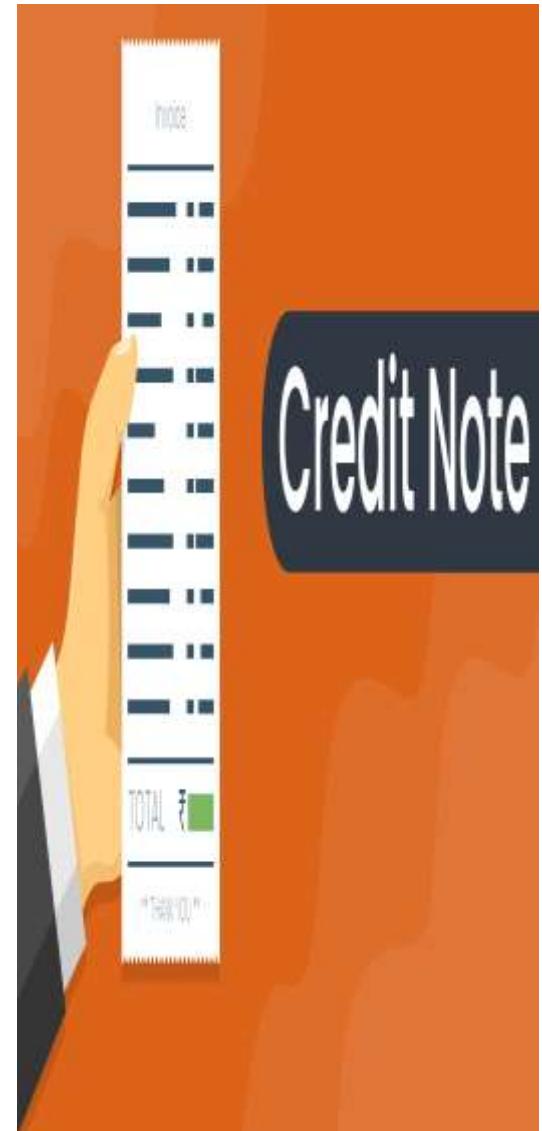
may issue one or more credit notes for supplies made in a FY

**Recipient of goods or services or both**



# Credit Note

- No reduction in output tax liability of the supplier shall be permitted, if the incidence of tax and interest on such supply has been passed on to any other person.
- Registered person is allowed to issue a **consolidated credit note** against the multiple invoices issued in the **same FY**.
- There **cannot be a bunching of two FY's** for issue of a credit note. So, for a tax invoice issued in March 2025 and another issued in June, 2025, a single credit note **cannot** be issued against both the invoices.
- In case of a credit note issued for a **discount**, the discount must be provided in terms of an agreement entered into before or at the time of supply, as provided in clause (i) of section 15(3) (b) of the CGST Act.





# Credit Note

30

- As given in Circular 92/11/2019 GST dated 07.03.19, Credit note(s) are **NOT PERMITTED** to be issued in case **SECONDARY DISCOUNTS** are allowed by the supplier since the tax liability of the supplier does not get reduced in such case.
- However, supplier can issue **financial/ commercial credit note**(s) to reduce the value of supply payable by the recipient to the supplier
- Any registered person who issues a credit note shall **declare the details** of such credit note in the return for the month during which such credit note has been issued but not later than:
  - (i) 30th November following the end of the FY in which such supply was made, or
  - (ii) The date of furnishing of the relevant annual return, **whichever is earlier**.



# Procedure in respect of return of time expired medicines

## Circular 72/46/2018 dated 26.10.2018

**Option 1:** Return of time expired medicines by a **registered person** (Other than a composition taxpayer) **may be treated as fresh supply** and accordingly, **a tax invoice** may be issued for such return supply.

- It is also clarified that a wholesaler accepting the time expired medicines from retailer is entitled to claim the ITC of GST (subject to section 17(5)) mentioned on the tax invoice issued by the registered person returning such goods;
- In case if the person returning time expired drugs / medicines **is a composition taxpayer**, he may issue a **bill of supply** and pay the tax applicable to a composition tax payer.
- In such a scenario, there does not arise a question to claim input tax credit by the wholesaler;
- In case of **unregistered persons**, time expired medicines can be returned by way of issuing any **commercial document** without charging any tax on the same.



# Procedure in respect of return of time expired medicines

32

**Circular 72/46/2018 dated 26.10.2018**

## Option 2:

- The goods may be returned by issuing a delivery challan and the supplier may declare (and thereby issue) the details of a **credit note** against such return supply under section 34(1) up to

30th November following the end of FY in which such supply was made **OR**

the date of furnishing the relevant annual return, **whichever is earlier.**

- If this time has lapsed, he may issue a **financial credit note**.

There is no requirement to declare such financial credit note on the common portal as tax liability cannot be adjusted in this case.





# Reporting

## 4. Eligible ITC

[Help ?](#)

Tables 4(A)(1), (3), (4), (5) and 4(B)(2) are auto-drafted based on the values in GSTR-2B.



Details	Integrated Tax (₹)	Central Tax (₹)	State/UT Tax (₹)	CESS (₹)
<b>(A) ITC Available (whether in full or part)</b>				
(1) Import of goods	0.00			0.00
(2) Import of services	0.00			0.00
(3) Inward supplies liable to reverse charge (other than 1 & 2 above)	0.00	0.00	0.00	0.00
(4) Inward supplies from ISD	0.00	0.00	0.00	0.00
(5) All other ITC	0.00	25,380.02	25,380.02	0.00
<b>(B) ITC Reversed</b>				
(1) As per rules 38,42 & 43 of CGST Rules and section 17(5)	0.00	0.00	0.00	0.00
(2) Others	0.00	0.00	0.00	0.00
<b>(C) Net ITC Available (A) - (B)</b>				
	0.00	25,380.02	25,380.02	0.00
<b>(D) Other Details</b>				
(1) ITC reclaimed which was reversed under Table 4(B)(2) in earlier tax period	0.00	0.00	0.00	0.00
(2) Ineligible ITC under section 16(4) & ITC restricted due to PoS rules	0.00	0.00	0.00	0.00

[CANCEL](#)
[CONFIRM](#)



# Debit Notes in GST – Section 34

34

Where one or more tax invoices have been issued for supply of any goods or services or both



Taxable value in invoice < Taxable value in respect of such supply

Tax charged in invoice < Tax payable in respect of such supply



**Registered Supplier  
of goods or services  
or both**

may issue one or more  
debit notes for supplies  
made in a FY

**Recipient of goods or  
services or both**



# Tax Invoices in cases of outward supply of special services – Rule 54

35

Sl No	Class of supplier of taxable services	Nature of document	Optional	Mandatory
1	Insurer, Banking Company, Financial Institution and NBFC- Rule 54(2)	Consolidated Tax Invoice or any other similar document at the end of the month for services supplied during the month.	a. Serial no. b. Address of the recipient of services	All particulars as specified in rule 46 other than that specified in 'Optional' column. Signature or digital signature of supplier or his auth. representative not required
2	Goods transport agency (GTA) transporting goods by road- Rule 54(3)	Tax Invoice or any other similar document	None	In addition to those cited in Rule 46; a. Gross weight of consignment; b. Name of the Consignor, Consignee; c. Regn. No. of Vehicle; d. Details of goods transported; e. Details of place of Origin and destination; f. GSTIN of person liable to pay tax whether as consignor / consignee / GTA.



# Tax Invoices in cases of outward supply of special services – Rule 54

36

Sl No	Class of supplier of taxable services	Nature of document	Optional	Mandatory
3	Passenger transport agency- Rule 54(4)	Tax invoice or ticket	<ul style="list-style-type: none"><li>a. Serial no.</li><li>b. Address of the recipient of services</li></ul>	<p>All particulars as specified in rule 46 other than that specified in 'Optional' column</p> <p>Signature or digital signature of supplier or his authorized representative not required.</p>
4	Exhibitor of cinematographic films in multiplex screens- Rule 54(4A)	Electronic ticket	Details of the recipient of service	<p>All particulars as specified in Rule 46 other than that specified in 'Optional' column.</p> <p>Issue of electronic ticket optional for Supplier of such service in a screen <b>other than multiplex screen</b></p>



# Delivery challan – Rule 55

37



Rule 55 specifies the cases where at the time of removal of goods for transportation, goods can be removed on delivery challan and invoice may be issued after delivery.

The delivery challan shall be prepared in **TRIPPLICATE**  
**Cases where Delivery Challan is required to be issued are:**

- Supply of liquid gas where the quantity at the time of removal from the place of business of the supplier is not known,
- Transportation of goods sent for job work
- Transportation of goods for reasons other than by way of supply, or
- Such other supplies as may be notified by the Board



# Transportation of goods without issue of invoice

38

- The consigner may issue a **delivery challan**, serially numbered not exceeding 16 characters, in one or multiple series, in lieu of invoice at the time of removal of goods for transportation, containing the following details, namely:-
  - i. Date and number of the delivery challan;
  - ii. Name, address and GSTIN of the consigner, if registered;
  - iii. Name, address and GSTIN or Unique Identity Number of the consignee, if registered;
  - iv. HSN code and description of goods;
  - v. Quantity (provisional, where the exact quantity being supplied is not known);
  - vi. Taxable value;
  - vii. Tax rate and tax amount – central tax, State tax, integrated tax, Union territory tax or cess, where the transportation is for supply to the consignee;
  - viii. Place of supply, in case of inter-State movement; and
  - ix. Signature.



Where inputs or capital goods have been sent to the job worker for the purposes of job work, and have **neither been returned nor been directly dispatched for supply** from the place of the job worker within the timelines specified in section 19, **it shall be deemed that such goods** (other than moulds and dies, jigs and fixtures, or tools) **have been supplied by the Principal to the job worker as on the date of dispatch of such goods to the job worker** (or the date of receipt of goods by the job worker where the goods were sent to the job worker's premises without being first received at the place of business of the Principal).





# Goods transported in SKD/CKD condition or in batches or lots

40



- Where the goods are being transported in a semi knocked down or completely knocked down condition or in batches or lots,
  - (a) The supplier shall issue the complete invoice before dispatch of the **first consignment**;
  - (b) The supplier shall issue a **delivery challan for each of the subsequent consignments**, giving reference of the invoice;
  - (c) Copies of the corresponding delivery challan shall accompany each consignment along with a duly certified copy of the invoice; and
  - (d) **The original copy** of the invoice shall be sent along with the **last** consignment.





## MCQ 1

42

If goods have been sent on approval basis, and no acceptance or rejection confirmation have been received, Invoice u/s 31 shall ..

- (a) be issued within 6 months of removal of goods
- (b) be issued within time limit agreed under contract
- (c) be issued within 3 months of removal of goods
- (d) Not be issued



## MCQ 2

43

CA providing audit services to Bank shall raise the invoice under Rule 47 .....

- (a) At time of completion of service
- (b) within 45 days of completion of service
- (c) At time of receipt of payment
- (d) within 30 days of completion of service



## MCQ 3

44

Mr A, a registered person in GST has procured certain goods or services which are liable to tax under reverse charge u/s 9(3) or 9(4) from an Unregistered person.

As per Rule 47A, Mr A shall .....

- (a) be required to issue invoice within 30 days from the date of receipt of the said supply of goods or services
- (b) be required to issue invoice within 60 days from the date of receipt of the said supply of goods or services
- (c) Not be required to issue any invoice as it is an inward supply
- (d) be required to issue invoice on the date of receipt of the said supply of goods or services



## MCQ 4

45

Delivery challan under rule 55 in normal cases are to be issued in ...

- (a) Single copy
- (b) Dual Copy
- (c) Triplicate Copy
- (d) None of the above



## MCQ 5

46

At the time of receipt of advance for services, if nature of supply and tax rate are not determinable...

- (a) Tax need not be paid
- (b) Nature of supply shall be **Intra** state and tax rate to be taken as 9% CGST and SGST each
- (c) Nature of supply shall be **Inter** state and tax rate to be taken as 18% IGST
- (d) Nature of supply shall be **Inter** state and tax rate to be taken as 5% IGST



## MCQ 6

47

“Continuous supply of **services** means supply of services which is provided, or agreed to be provided, continuously or on recurrent basis continuously under a contract .....with periodic payment obligations

- (a) for a period exceeding 3 months
- (b) for a period exceeding 6 months
- (c) for a period exceeding 1 month
- (d) for a period exceeding 9 months



# Thank You

Presented by:

**CA Rishabh A Parikh,**

FCA, M.Com (F&T), DISA (ICAI), PGD(GST), B.Com, Social Auditor

Email id: [carishabhparikh@gmail.com](mailto:carishabhparikh@gmail.com)

Mobile: +91-8547165943