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CA FINAL (Nov 2024)
GROUP II - PAPER 5
INDIRECT TAX LAWS
SUGGESTED ANSWERS
(Series 1)

PART - I (MCQs)

MCQ - 2 marks each														
1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.	13.	14.	15.
D	A	C	D	C	A	B	A	C	C	D	A	C	D	C

PART - II (Descriptive Answers)

1 (1) Computation of ITC credited to Electronic Credit Ledger

Particulars	Value (₹)	CGST (₹)	SGST (₹)	IGST (₹)
GST paid on intra-State inward supplies taxable @ 9%	40,00,000	3,60,000	3,60,000	
GST paid on inter-State inward supplies taxable @ 18%	10,00,000			1,80,000
Inward supplies exempt from GST [Since exempt, no GST is paid.]	5,00,000	--	--	--
Freight paid to GTA for intra-State of taxable goods (Note 1) @ 2.5% [60,000 x 80%] [Since rate of GST on GTA services is 2.5%, tax is payable under reverse charge.]	48,000	1,200	1,200	--
GST on freight paid to GTA for intra-State of exempt goods (Note 2) @ 2.5% under reverse charge [ITC on input services used exclusively in relation to exempt supplies is not available.]	12,000 [60,000 x 20%]	--	--	
GST on telephone expenses (Note 3) @ 9% [ITC of services used in the course or furtherance of business is available.]	30,000	2,700	2,700	
Premium paid on insurance taken on car used for firm's work	8,500	--	--	

[ITC is blocked u/s 17(5) on general insurance services relating to those motor vehicles which are ineligible for ITC.]				
Outdoor catering services [ITC on outdoor catering is blocked u/s 17(5) if the same is not used for making an outward supply of outdoor catering or as an element of a taxable composite/mixed supply.]	40,000	--	--	
GST on monthly rent for premises of sales outlet @ 9% (Note 4) [ITC of services used in the course or furtherance of business is available.]	60,000	5,400	5,400	
ITC credited to the electronic ledger		3,69,300	3,69,300	1,80,000

(2) Computation of common ITC available for apportionment

Particulars	CGST (₹)	SGST (₹)	IGST (₹)
ITC credited to Electronic Credit Ledger	3,69,300	3,69,300	1,80,000
Less: ITC on taxable goods	3,60,000	3,60,000	1,80,000
Less: ITC on freight paid to GTA for transportation of taxable goods	1,200	1,200	
Common credit for apportionment	8,100	8,100	--

(3) Computation of ITC attributable towards exempt supplies

Particulars	CGST (₹)	SGST (₹)	IGST (₹)
ITC attributable towards exempt supplies = Common credit x (Aggregate value of exempt supplies during the tax period/ Total turnover during the tax period)			
[₹ 8,100 x (₹ 6,00,000/₹ 66,00,000)] (Note 5)	736	736	

(4) Computation of ITC available for utilization towards payment of tax in terms of rule 86B

Particulars	CGST (₹)	SGST (₹)	IGST (₹)
Maximum amount of output tax liability that can be discharged from ECrL [99% of Output tax liability]	4,00,950 [45,00,000 x 9% x 99%]	4,00,950 [45,00,000 x 9% x 99%]	2,67,300 [15,00,000 x 18% x 99%]
[Since the value of taxable supply other than exempt supply in December 20XX (₹ 45 lakh + ₹ 15 lakh) exceeds ₹ 50 lakh, amount from electronic credit ledger which it can use to discharge its output tax liability of said month cannot exceed 99% of such tax			

liability in terms of rule 86B of the CGST Rules, 2017.]			
Amount of ITC available for utilization towards payment of tax [Since the ITC available in ECrL after reversal thereof is lower than the aforesaid amount, entire ITC can be utilised towards payment of GST.]	3,68,564 [3,69,300 – 736]	3,68,564 [3,69,300 – 736]	1,80,000

Notes

1. It has been most logically presumed that remaining 80% of the freight has been paid exclusively on transportation of taxable outward supply of goods and GTA providing said services is registered in the State of Gujarat.
2. It has been most logically presumed that freight has been paid on transportation of outward supply of exempt goods. In case it is assumed that freight has been paid on transportation of inward supply of exempt goods, amount of ITC available with regard to the same will change accordingly.
3. Telephone expenses have been considered to be in the nature of input services. Further, it has been assumed that the supplier is registered in the State of Gujarat.
4. It has been assumed that supplier of services of renting of premises is registered in State of Gujarat.
5. Telephone expenses have been considered to be in the nature of input services.

2 (a)

Computation of gross GST liability of Mr. Nagarjun

Particulars	Value (₹)	GST (₹)
Supplies on which Mr. Nagarjun is liable to pay GST under forward charge		
Amount charged for service provided to recognized sports body as selector of national team [Note 1]	50,000	9,000
Commission received as an insurance agent from insurance company [Note 2]	Nil	Nil
Amount charged as business correspondent for services provided to the urban branch of a nationalised bank with respect to savings bank accounts [Note 3]	15,000	2,700
Services provided to foreign diplomatic mission located in India [Note 4]	28,000	5,040
Funeral services [Note 5]	Nil	Nil
Supplies on which Mr. Nagarjun is liable to pay GST under reverse charge		
Services received from GTA [Note 6]	45,000	2,250
GST payable		18,990

Notes:

- (1) Services provided to a recognized sports body by an individual only as a player, referee, umpire, coach or team manager for participation in a sporting event organized by a recognized sports body are exempt from GST vide exemption notification. Thus, service provided as selector of team is **liable to GST**.

- (2) Commission for providing insurance agent's services is liable to GST. However, the tax payable thereon is to be paid by the recipient of service i.e., insurance company, under reverse charge in terms of Notification No. 13/2017 CT (R) dated 28.06.2017. Thus, **Mr. Nagarjun will not be liable to pay GST on such commission.**
- (3) Services provided by business correspondent to a banking company with respect to accounts in its rural area branch are exempt from GST vide exemption notification. Thus, such services provided in respect of urban area branch will be **taxable.**
- (4) While services provided by a foreign diplomatic mission located in India are exempt from GST vide exemption notification, services provided to such mission are **taxable.**
- (5) Funeral services being covered in Schedule III of CGST Act are **not a supply** and thus, are outside the ambit of GST.
- (6) GST on services provided by a GTA (unregistered) to a registered person is payable by the recipient of service i.e., the registered person, under **reverse charge** in terms of Notification No. 13/2017 CT (R) dated 28.06.2017. The turnover of previous year is irrelevant in this case.

2 (b)

Computation of assessable value of product 'Z'

Particulars		Amount
Ex-factory price of the goods		8,500 US\$
Freight from factory of the exporter to load airport (airport in the country of exporter)	250 US \$	
Loading and handling charges at the load airport	250 US \$	
Freight from load airport to the airport of importation in India	4,500 US \$	
Total cost of transport, loading and handling charges associated with the delivery of the imported goods to the place of importation	5,000 US \$	
Cost of transport, loading, unloading and handling charges associated with the delivery of the imported goods to the place of importation (restricted to 20% of FOB value) [Note 1]		1,800 US\$
Insurance (actual)		<u>2,000 US\$</u>
CIF for customs purpose		12,300 US\$
Value for customs purpose		12,300 US\$
Exchange rate as per CBIC [Note 2]		₹ 70 per US\$
		Amount (₹)
Assessable value (₹ 70 x 12,300 US \$)		8,61,000
Add: Basic customs duty @ 10% [Note 3]		86,100
Add: SWS @ 10%		<u>8,610</u>
Value for the purpose of levying integrated tax [Note 4]		9,55,710
Add: Integrated tax @ 12% (rounded off)		1,14,685
Total duty & tax payable (86,100 + 8,610 + 1,14,685)		2,09,395

Notes:

- (1) In the case of goods imported by air, the cost of transport, loading, unloading and handling charges associated with the delivery of the imported goods to the place of

importation shall not exceed 20% of the FOB value of the goods. [Fifth proviso to rule 10(2) of the Customs Valuation (Determination of Value of Imported Goods) Rules, 2007 (CVR)].

FOB value in this case is the ex-factory price of the goods (8,500 US \$) plus the cost of transport from factory to load airport (250 US \$) plus loading and handling charges at the load airport (250 US \$) which is 9,000 US \$.

- (2) Rate of exchange determined by CBIC is to be considered [Clause (a) of the explanation to section 14 of the Customs Act, 1962].
- (3) Section 15 of the Customs Act, 1962 provides that rate of duty shall be the rate in force on the date of presentation of bill of entry or the rate in force on the date of arrival of aircraft, whichever is later.
- (4) Integrated tax is levied on the sum total of the assessable value of the imported goods and customs duties [Section 3(8) of the Customs Tariff Act, 1962]. SWS leviable on integrated tax have been exempted.

3 (a) Case I

As per section 12(3), **where both the service provider and the service recipient are located in India, the place of supply of services directly in relation to an immovable property, including services provided by interior decorators is the location of the immovable property. However, if the immovable property is located outside India, the place of supply is the location of the recipient.**

Since in the given case, both the service provider (Mr. Mahendra Goyal) and the service recipient (Mr. Harish Jain) are located in India and the **immovable property is located outside India** (New York), the place of supply will be the **location of recipient, i.e. Maharashtra.**

Case II

As per section 13(4), **where either the service provider or the service recipient is located outside India, the place of supply of services directly in relation to an immovable property including services of interior decorators is the location of the immovable property.**

Since in the given case, service provider (Mr. Mahendra Goyal) is located in India and service recipient (Mr. Harish Jain) is located outside India (New York), the place of supply will be the location of immovable property, **i.e. Paris (France).**

- 3 (b)** As per section 10(3), the option availed by a registered person to pay tax under composition scheme under sub-sections (1) and (2) of section 10 shall **lapse with effect from the day on which his aggregate turnover during a financial year exceeds ₹ 1.5 crore** [₹ 75 lakh in case of Special Category States except Assam, Himachal Pradesh and Jammu and Kashmir].

As per section 2(6), **aggregate turnover means the aggregate value of all taxable supplies** (excluding the value of inward supplies on which tax is payable by a person on reverse charge basis), **exempt supplies, exports** of goods or services or both and inter-State supplies of persons having the same PAN, to be computed on all India basis **but excludes CGST, SGST/UTGST, IGST and GST Compensation Cess.**

In the given case, firm is registered under composition scheme in the State of Maharashtra. The aggregate turnover of firm exceeds ₹ 1.5 crore on 3rd October [aggregate of both taxable

and exempt turnover from 1st April to 3rd October, i.e. ₹ 1,50,05,000 (1,44,65,000 + ₹ 2,03,000 + ₹ 1,38,250 + ₹ 1,06,250 + ₹92,500)]

The inward supplies of goods transportation services in respect of which the firm has to pay tax under reverse charge have not been included in the aggregate turnover in terms of section 2(6). The tax is payable under reverse charge on such services as the GTA has not opted to pay tax under forward charge.

Thus, the firm will have to pay tax under regular scheme (Section 9) from 3rd October.

Output tax liability of B & D Company under composition scheme

During the period when the firm pays tax under composition scheme, i.e. from 1st April to 2nd October, tax will be payable on quarterly basis and no ITC will be available [Section 10(4) read with sub-sections (2) and (7) of section 39]. Further, since the firm is trading in goods, tax will be payable @ 1% (½% CGST + ½% SGST) of the turnover of taxable supplies of goods and services (i.e. 'P') in the State [Section 10(1) read with rule 7].

The tax liability for the quarters ended June, September and December under composition scheme will be computed as under

Particulars	Quarter ended 30 th June (₹)	Quarter ended 30 th September (₹)	Quarter ended 31 st December (₹)
Turnover of 'P' (Taxable supplies)	60,00,000	50,00,000	4,03,000 [2,00,000 + 1,36,000 + 67,000]
CGST @ 0.5% [A1]	30,000	25,000	2,015
SGST @ 0.5% [B1]	30,000	25,000	2,015
CGST @ 2.5% [A2]	1,500	1,500	-
SGST @ 2.5% [B2]	1,500	1,500	-
Total CGST [A1 + A2]	31,500	26,500	2,015
Total SGST [B1 + B2]	31,500	26,500	2,015
Total CGST liability for the period from 1st April to 2nd October	60,015 [31,500 + 26,500 + 2015]		
Total SGST liability for the period from 1st April to 2nd October	60,015 [31,500 + 26,500 + 2015]		

- 3 (c) In the given case, since Product XYZ is being imported into the country in increased quantity, Central Government should consider levying safeguard Duty and not anti-dumping duty.

Anti-dumping duty is imposed when any article is exported from any country to India at less than its normal value, which is not the case here.

However, **safeguard duty can be imposed only** when Central Government is satisfied that such **increased importation is causing/threatening to cause serious injury to the domestic industry.**

Exemptions/reliefs:

- (a) Safeguard duty shall **not be imposed** on articles originating from **developing country** if the share of **imports of that article from that country** \leq **3% of the total imports** of that article into India.

- (b) Safeguard duty shall **not be imposed** on articles originating from more than one developing country if the **aggregate of imports from developing countries** each with less than 3% import share taken together **≤ 9% of the total imports of that article** into India.
- (c) Safeguard duty **shall not be applicable** on articles imported by a **100% EOU/ SEZ unit** unless specifically made applicable;
- (d) Safeguard duty shall not be applicable on articles imported by a 100% EOU/ SEZ unit **unless the article imported is either cleared as such/used in the manufacture of any goods that are cleared, into DTA.**
- (e) Central Government may exempt notified quantity of any article, when imported from any country into India, from whole/part of the safeguard duty.

- 4 (a)** As per section 51 of the CGST Act, 2017, Government departments, agencies, local authority and notified persons are **required to deduct tax @ 2%** (1% CGST + 1% SGST/UTGST) or IGST @ 2% from payment made to the supplier of taxable goods and/or services where the total value of such supply [excluding tax and compensation cess indicated in the invoice], **under a contract, exceeds ₹ 2,50,000.**

Since in given case, Yash Shoppe is supplying goods and services exclusively to Government departments, agencies, local authority and persons notified u/s 51 of CGST Act, 2017, applicability of TDS provisions on its various receivables is examined in accordance with the above-mentioned provisions as under:

S.N.	Particulars	Total contract value due to be received [excluding GST] (₹)	Tax to be deducted		
			CGST @ 1% (₹)	SGST @ 1% (₹)	IGST @2% (₹)
1	Supply of computer stationery to PSU in Mumbai [Since the total value of supply under the contract [excluding IGST (being inter-State supply)] does not exceed ₹ 2,50,000, tax is not required to be deducted.]	2,42,857 [2,72,000 × 100/112]	-	-	-
2	Supply of air conditioner to GST Department in Delhi [Since the total value of supply under the contract [excluding IGST (being inter-State supply)] exceeds ₹ 2,50,000, tax is required to be deducted.]	2,55,000	-	-	5,100
3	Supply of a generator renting service to Municipal Corporation of Jaipur [Since the total value of supply under the contract [excluding CGST and SGST (being intra-State supply)] exceeds ₹ 2,50,000, tax is required to be deducted.]	3,12,500 [3,50,000 × 100/112]	3,125	3,125	-
	Total		3,125	3,125	5,100

- 4 (b)** If owner of the goods does not come forward for payment of such penalty, the amount of penalty to be paid for release of goods detained or seized under section 129 of the CGST Act, 2017 is equal to 50% of the value of the goods or 200% of the tax payable on such goods, whichever is higher.

Therefore, in the given case, the amount payable

(a) ₹ 30,00,000 × 50% = ₹ **15,00,000**

or

(b) ₹ 5,40,000 × 200% = ₹ **10,80,000**

whichever is higher

Thus, the amount of penalty that can be imposed is ₹ **15,00,000**.

However, **in case of exempted goods**, amount to be paid for release of goods detained is equal to 5% of the value of goods or ₹ 25,000, whichever is less.

= 5% of ₹ 30,00,000 or ₹ 25,000, whichever is less

= ₹ **1,50,000 or ₹ 25,000, whichever is less**

= ₹ **25,000**

4 (c) Computation of import duty payable by Vipul

Particulars	Amount (US \$)
Assessable value	1,00,000
Value in Indian currency (US \$ 1,00,000 x ₹ 65.20) [Note 1]	65,20,000
Customs duty @ 10% [Note 2]	6,52,000
Add: Social welfare surcharge @ 10% on ₹ 6,52,000	65,200
Total customs duty payable	7,17,200

Notes:

- As per third proviso to section 14(1) of the Customs Act, 1962, assessable value has to be calculated with reference to the rate of exchange prevalent on the date on which the into bond bill of entry is presented for warehousing under section 46 of the Customs Act, 1962.
- Goods which are **not removed within the permissible period** are **deemed to be improperly removed** in terms of section 72 of the Customs Act, 1962 **on the day they should have been removed** [Kesoram Rayon v. CC 1996 (86) ELT 464 (SC)]. The applicable **rate of duty** in such a case is the rate of duty **prevalent on the last date on which the goods should have been removed**.

As per section 61 of the Customs Act, 1962, if goods (not meant for being used in an 100% EOU, STP unit, EHTP unit) **remain in a warehouse beyond a period of 90 days** from the date on which the order permitting deposit of goods in warehouse under section 60 is made, **interest is payable @ 15% p.a.**, on the amount of duty payable at the time of clearance of the goods, for the period **from the expiry of the said 90 days till the date of payment of duty** on the warehoused goods.

Therefore, **interest payable** will be computed as under:

Period of 90 days commencing from the date of order made under 60	19 th August
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expires on	
No. of days for which interest shall be payable [12 days of August + 30 days of September + 14 days of October]	56 days
Interest payable = ₹ 7,17,200 x 15/100 x 56/365 (rounded off)	₹ 16,505

- 5 (a)** Section 54(3)(ii) allows refund of unutilized input tax credit (ITC) at end of any tax period to a registered person where credit has accumulated on account of inverted duty structure i.e. rate of tax on inputs being higher than rate of tax on output supplies (other than nil rated or fully exempt supplies), except supplies of goods or services or both as may be notified by Government on the recommendations of the Council.

In the given case, the rates of tax on inputs used in Products A and B (18% each) are higher than rates of tax on output supplies of Products A and B (5% each). However, Product B is notified as a product, in respect of which no refund of unutilised ITC shall be allowed under section 54(3)(ii). Therefore, only Product A is eligible for refund under section 54(3)(ii).

Further, rule 89(5) stipulates that in the case of refund on account of inverted duty structure, refund of ITC shall be granted as per the following formula –

$$\text{Maximum Refund Amount} = \frac{\text{Turnover of inverted rated supply of goods and services} \times \text{Net ITC}}{\text{Adjusted Total Turnover}} - \frac{\text{Tax payable on such inverted rate supply of goods and services} \times \text{Net ITC}}{\text{ITC availed on inputs and input servi}}$$

where,-

- A. "Net ITC" means input tax credit availed on inputs during the relevant period;
- B. Adjusted Total Turnover means the sum total of the value of-
- the turnover in a State or a Union territory, as defined under section 2(112), excluding the turnover of services; and
 - the turnover of zero-rated supply of services determined in specified manner and non zero-rated supply of services, excluding-
 - the value of exempt supplies other than zero-rated supplies; and
 - the turnover of supplies in respect of which refund is claimed under rule 89(4A) or rule 89(4B) or both, if any,
- during the relevant period.
- C. Relevant period means the period for which the claim has been filed.

In accordance with the aforesaid provisions, the maximum refund amount which Super Engineering Works is eligible to claim shall be computed as follows:

Tax payable on inverted rated supply of Product A = ₹ 5,00,000 × 5% = **₹ 25,000**

Net ITC = ₹ 1,18,000 (₹ 54,000 + ₹ 54,000 + ₹ 10,000) [Net ITC availed during the relevant period needs to be considered irrespective of whether the ITC pertains to inputs eligible for refund of inverted rated supply of goods or not as clarified vide Circular No. 79/53/2018-GST dated 31.12.2018]

Adjusted Total Turnover = **₹ 9,50,000** (₹ 5,00,000 + ₹ 3,50,000 + ₹ 1,00,000)

Turnover of inverted rated supply of Product A = **₹ 5,00,000**

Maximum refund amount for Super Engineering Works is as follows:

$$= \frac{[(₹ 5,00,000 \times ₹ 1,18,000)]}{₹ 9,50,000} - \frac{[(₹ 25,000 \times ₹ 1,18,000)]}{₹ 1,18,000} = ₹ 37,105$$

- 5 (b) Dynamic Quick Response (QR) code is not applicable to following suppliers when they issue an invoice to an unregistered person:
- (i) **Insurer or banking company or financial institution** including NBFC
 - (ii) **GTA** (Goods transport agency) supplying services in relation to transportation of goods by road in a goods carriage
 - (iii) Supplier of **passenger transportation service**
 - (iv) Person supplying services by way of **admission to exhibition of cinematograph films** in multiplex screens
 - (v) **Supplier of OIDAR** (online information and database access or retrieval) services
 - (vi) In case of **exports**

- 5 (c) The abatement of duty is allowed where it is shown to the satisfaction of the Assistant/Deputy Commissioner of Customs that, inter alia, any imported goods, other than warehoused goods, had been damaged at any time after the unloading thereof in India but before their examination, on account of any accident not due to any wilful act, negligence or default of the importer.

Thus, in view of the above-mentioned provisions, the stand taken by the proper officer of **refusing the claim for abatement is not valid** in law.

The **duty to be charged on the damaged goods** shall be reduced in proportion to the reduction in the value of goods on account of damage.

Thus, in the given case, the amount of **total duty payable**

$$= [\text{₹ } 1,50,000 / \text{₹ } 7,50,000] \times \text{₹ } 1,50,000 = \text{₹ } 30,000$$

The abatement of duty is allowed in case of deterioration only if such deterioration occurs before or during the unloading of goods. **Since in this case, imported goods have deteriorated before clearance for home consumption but after unloading, abatement of duty will not be allowed and full duty will have to be paid.**

- 6 (a) The written submissions in reply to SCN issued to Rajul Associates are as follows:
- i. The show cause notice (SCN) issued for normal period of limitation under section 73(1) is **not sustainable**.
 - ii. The **SCN** under section 73(1) **can be issued at least 3 months prior to the time limit specified for issuance of order** under section 73(10). The adjudication **order** under section 73(10) has to be issued **within 3 years from the due date for furnishing of annual return** for the financial year to which the short-paid tax relates to.

The due date for furnishing annual return for a financial year is on or before the 31st day of December following the end of such financial year [Section 44]. Thus, SCN under section 73(1) can be issued within 2 years and 9 months from the due date for furnishing of annual return for the financial year to which the short-paid tax relates to.
 - iii. The SCN has been issued for the period between 01.07.2019 to 31.12.2019 which falls in the financial year (FY) **2019-20**. **Due date for furnishing annual return** for the FY 2019-20 is **31.12.2020 and 3 years'** period from due date of filing annual return

lapses on 31.12.2023. Thus, SCN under section 73(1) ought to have been issued latest by 30.09.2023.

- iv. Since the **notice has been issued after 30.09.2023**, the **entire proceeding is barred by limitation and deemed to be concluded** under section 75(10).

6 (b) If proper explanation is not furnished for the discrepancy detected in return filed, while conducting scrutiny of returns under section 61 of the CGST Act, 2017 of a registered person, **proper officer may:**

- (i) **conduct audit** of the registered person; or
- (ii) **direct the registered person to get his records** including books of account examined and **audited by a Chartered Accountant or a Cost Accountant** nominated for this purpose by the Commissioner; or.
- (iii) exercise the powers of **inspection, search and seizure** with respect to the registered person, or
- (iv) **proceed to determine the tax** and other dues of the registered person **under Sections 73 or 74** of the Act.

6 (c) In both DFIA and Advance Authorization schemes, **import of inputs, oil and catalyst** which are consumed/utilised in the process of production of export product are **permitted without payment of customs duty. Validity period** for both the schemes is **12 months** from the date of issue.

Key **differences between DFIA and Advance Authorisation** schemes are as follows -

- (i) **'Advance Authorisation' is not transferable. DFIA is transferable** after export obligation is fulfilled.
- (ii) **Advance Authorisation** scheme requires **15% value addition, while** in case of **DFIA, minimum 20% value addition** is required.
- (iii) Advance Authorisation and/or material imported under **Advance Authorisation is subject to 'Actual User' condition. No DFIA** shall be issued for an input which is subject to pre-import condition or **where SION prescribes 'Actual User' condition** or certain other specified inputs with pre import condition.
- (iv) DFIA cannot be issued where SION (Standard Input Output Norms) prescribes actual user condition [as the material is transferable after fulfilment of export obligation]. **Advance Authorisation can be issued even if SION for that product is not fixed. DFIA can be issued only if SION has been fixed** for that product to be exported.
- (v) **IGST** has been **exempted** on imports **under Advance Authorisation** scheme but there is **no such exemption available** if imports are under **DFIA** scheme.