



Accounts and Records; E-way Bill

Accounts and Other Records:

I. Who is required to maintain books of accounts and at which place?

Every **regd person** must maintain BOA at their **PPoB** & at any **APoB** mentioned in CoR. Where >1 POB is specified in CoR, accounts relating to each POB shall be kept at such POB i.e. at the **respective locations**.

Note:

- In case of goods like tea, rubber & coffee supplied through **auction**, principal/auctioneer/buyer may declare warehouses, where such goods are stored, **as their APoB** & can maintain BOA for such APoB at their **PPoB** by notifying PO, & principal/auctioneer remain eligible for ITC if other conditions meet.
- If documents, registers, or BOA of a regd. person are found at **premises other** than those mentioned in CoR, they are **presumed** to be **maintained by such regd person**, unless proven otherwise.

II. Which accounts and records are required to be maintained?

A true & correct account of following is to be maintained:

(a) production or manufacture of goods;	(b) inward & outward supply of goods/services/both;
(c) stock of goods;	(d) ITC availed;
(e) output tax payable and paid	(f) such other particulars as may be prescribed

Note:

- Commissioner can require a specific class of taxable persons to maintain additional BOA/ documents. If he believes that a class of taxable persons is unable to maintain accounts as per provisions, he may allow them to maintain BOA in a prescribed manner, with reasons recorded in writing.
- Additional Records to be maintained by Specified Persons: Regd. persons is required to maintain a true & correct account of:
 - Goods/services **imported/exported**.
 - Supplies subject to **RCM** with relevant documents (invoices, BoS, delivery challans, cr.note, dr.note, receipt-payment-refund vouchers).
 - Separate account of **advances** received, paid, and adjustments made thereto.
 - Particulars of **suppliers & recipients** of goods/services, including names and complete addresses.
 - Address & stock details of premises where goods are **stored**, including transit goods stored.
[If taxable goods are stored at place other than those so declared without cover of valid documents, PO will determine tax payable on such goods as if goods were supplied by regd. person]
- A supplier (**except composition suppliers**) must maintain following records:
 - (a) **Stock of Goods**: Accounts of stock for goods received & supplied, incl. opening balance, receipt, supply, goods lost/stolen/destroyed/written off, disposals (e.g., gifts, samples), & balance of stock (RM, FG, scrap, wastage).
 - (b) **Details of Tax**: Account of tax payable (including RCM tax), tax collected and paid, input tax, ITC claimed, & a register of tax invoices, cr. notes, dr. notes, and delivery challans issued or received.
- Records to be maintained by agent: An agent must maintain accounts containing:
 - (a) **Authorization** details received from each principal to receive/supply goods/services on his behalf.
 - (b) Description, value, & qty. (if appl.) of **goods/services received/supplied** on behalf of each principal.
 - (c) Details of **accounts furnished** to each principal.
 - (d) **Tax paid** on receipts/supplies of goods/services on behalf of each principal.

- Records to be additionally maintained by a Manufacturer & Service Provider:

Manufacturer	Monthly production A/cs showing quantitative details of	RM/services used in manufacture &
		goods so manufactured incl. waste & by-products
Service Provider	A/cs showing	quantitative details of goods used in provision of services
		details of input services utilized & services supplied

- Separate records for works contract to be maintained by a person executing works contract:
 - Names & addresses of **persons on whose behalf** contract is executed.
 - Description, value, and qty. (if appl.) of **goods/services received/utilized** for contract execution.
 - Details of **payments received** for each works contract.
 - Names & addresses of **suppliers** from whom goods/services were received.
- A custodian/clearing & forwarding agent must maintain true & correct records of goods handled on behalf of a regd. person for delivery/dispatch, & provide details to PO when required.
- Records by Owner/operator of a warehouse, godown, or transporter: They, whether regd. or not, must maintain **records of consignors, consignees**, and other relevant details of **goods handled**. If not already regd., they must obtain a **unique enrollment number** via GST Common Portal. Such person, once obtained unique enrollment number, shall not be eligible to use any of its GSTIN.
 - Transporter: Must keep records of **goods transported, delivered, & stored in transit**, along with **GSTIN of consignors & consignees**.
 - Owner/Operator of Warehouse/Godown: Must maintain records of **goods stored**, including details of **dispatch, movement, receipt, & disposal**. Goods should be stored in a way that allows **identification item-wise & owner-wise**, and should facilitate physical verification/inspection by PO on demand.

III. How the accounts and records will be maintained?

Records can be maintained in **2 ways**:

1. Manual Records: Each volume of BOA must be **serially numbered**.
2. Electronic Records:
 - Records can be stored electronically **on any device** & must be **authenticated with a digital signature**.
 - **Proper electronic backup** should be maintained to restore information in case of accidental loss.
 - On demand, regd. person **must produce** authenticated records in hard copy/an electronically readable format.
 - Details of **files, passwords, & necessary access** information should be provided when requested, along with a sample print copy.

Additional Requirements:

- **No entry** should be **erased/effaced/overwritten**. Incorrect entries (except clerical errors) must be scored out under attestation & then only correct entry is recorded.
- **A log** must be maintained for any edited/deleted entries in electronic records.
- All accounts, invoices, BoS, cr.-dr. notes, & delivery challans must be preserved for pd. specified in Sec. 36, & if manually maintained, kept at related POB & if maintained digitally, they should be accessible at every related POB.
- Upon demand, regd. person must **produce** all required BOA maintained under any law.

IV. What are the consequences of failure to maintain the accounts?

If a regd. person fails to account for goods/services as required u/s 35(1), PO will **determine tax payable on unaccounted goods/services**, treating them as if they had been supplied by person. Provisions of Sec. 73/74*, as applicable, will then apply to determine tax, with necessary adjustments.

[*Amendment from Nov' 25: Sec.74A reference also added]

Period of Retention of Accounts:

General Case	72 months from due date of furnishing Annual Return for year pertaining to such accounts & records
Where an appeal/ revision/ other proceedings before any Appellate/Revisional Autho. /Appellate Tribunal/Court, or an investigation is going on	LATER of: -1 year after final disposal of such appeal/ revision/proceedings/investigation OR -72 months from due date of furnishing Annual Return for year pertaining to such accounts & records

Electronic Way Bill (E-Way Bill):

A. Meaning of e-way bill and why is it required?

E-way bill is an electronic document generated on the GST portal evidencing movement of goods.

B. What are the benefits of e-way bill?

- (i) Phy. interface leading to digital interface resulting in elimination of state boundary check-posts.
- (ii) It will facilitate faster movement of goods.
- (iii) It will improve turnaround time of trucks & help logistics industry by increasing avg. distances travelled, reducing travel time as well as costs.

C. Registration requirement of the person generating the e-way bill

- Process of generating an e-way bill requires the person (whether supplier, recipient, or transporter) to be a regd. person on GST portal & to use their GSTIN on EWB portal.
- If transporter is not regd. under GST, they must enroll on e-way bill (EWB) portal to obtain a **unique 15-digit Transporter ID (TRANSIN)**. This TRANSIN serves as the unique identifier for unregistered transporters and is used for generating e-way bills.
- For transporters with **multiple GSTINs in different states**, common enrolment process allows them to register for a **unique common enrolment number** using one of their GSTINs. This common number enables transporter to generate e-way bills & update Part-B of e-way bill across all states using same unique no., & then can't use multiple GSTINs for e-way bill generation.

D. When is required to be generated?

E-way Bill is must for movement of goods of **consignment value > Rs. 50,000**. Movement should be:

- (i) in relation to a **supply**; or
- (ii) for reasons **other than supply**; or
- (iii) due to **inward supply** from an **unregd.** person,

Info. is to be furnished **prior to commencement of goods' movement**. Regd. person causing movement of goods shall furnish info. w.r.t. said goods in Part A of **Form GST EWB-01** before commencement of such movement. **Exceptions** to min. consignment value of Rs. 50,000 (i.e. in below cases, mandatory e-way bill generation is required):

-**Inter-State** transfer of goods by **principal to job-worker**

-**Inter-State** transfer of **handicraft goods** by a person exempted from obtaining registration

[Consignment Value = Value determined u/s 15, as declared in invoice/delivery challan, along with appl. taxes/GST, but excludes value of exempt goods if both exempt & taxable goods are included in invoice]

E. Who causes movement of goods?

If supplier is regd. & undertakes to transport goods, movement of goods is caused by supplier. If recipient arranges transport, movement would be caused by him. If goods are supplied by unregd. supplier to regd. recipient, movement shall be caused by such recipient (known at time of commencement of movement of goods).

Note: In "**Bill To Ship To**" model, where A orders B to ship goods to C, **two** tax invoices are issued: one from B to A, & another from A to C. But **only 1 e-way bill** is required for movement of goods from B to C, & either A or B can generate it.

F. Information to be furnished in e-way bill

- Part A [comprising GSTIN of supplier & recipient, place of delivery (PIN Code also), document (Tax invoice/ BoS/Delivery Challan/Bill of Entry) no. & date, value of goods, HSN code, & reason for transport, etc.]: To be furnished by regd. person who is causing movement of goods. However, info. in Part-A may be furnished by transporter if authorised by regd. person or by ECO/courier agency, if authorised from consignor, where goods are supplied through them.
- Part B (transport details) [Transporter document no. (Goods Receipt No./Railway Receipt No./Airway Bill No./Bill of Lading No.) and Vehicle No., for transport by road]: To be furnished by transporter.

After filling Part-A, a Part-A slip with a temporary no. is generated. This slip can be used later to fill Part-B when transportation details are available. E-way bill can only be generated after completing Part-B with transportation details.

G. Who is mandatorily required to generate e-way bill?

Scenario	Who Generates E-Way Bill	Additional Notes
Own/Hired Conveyance or Transport by Road	Consignor or Consignee	Furnish info. in Part B on common portal
Transport by Road via Transporter	Transporter (if consignor/consignee doesn't generate)	Required if consignment value > ₹50,000.
Transport by Rail, Air, or Vessel	Regd. Person (Supplier/Recipient)	To be generated either before/after commencement of movement. Transport details (e.g., GRN, Railway Receipt No., Airway Bill, Bill of Lading) must be furnished in Part-B. [For Railways transport, railways need to carry invoice/delivery challan; e-way bill is to be produced at delivery]
Optional for Low-Value Consignment(< ₹50000)	Consignor, Consignee, or Transporter	E-way bill generation is optional but permissible.
Unregd. Person causing movement in own conveyance/hired one/ via transporter	Unregd. Person/Transporter	E-way bill generation is optional.
Supply by unregd. supplier to regd. recipient	Regd. Recipient	Movement is deemed caused by recipient if known at commencement.

H. When is it not mandatory to furnish the details of conveyance in Part-B?

E-way bill is valid for movement of goods by road only when info. in Part-B is furnished. However, Part-B details are not required when goods are transported for 50 km within State/UT:

- from **consignor's POB to transporter's POB** for further transportation.
- from **transporter's POB to consignee's POB**.

I. Unique E-way Bill number (EBN): Upon generation of e-way bill on common portal, a unique **e-way bill no. (EBN)** is made available to supplier, recipient & transporter on common portal.

J. Transfer of goods from 1 conveyance to another: When goods are transferred b/w conveyances or transported via multiple modes, consignor/recipient/transporter **must update Part B** (transport details) of EWB before further movement. Updates can be made **multiple times within validity period** to reflect changes in transportation mode/vehicle details. Once Part B is updated by transporter, consignor/recipient cannot reassign e-way bill to another transporter.

K. Consolidated E-way bill:

- Consolidated EWB (**Form GST EWB-02**) is generated when **multiple consignments, each with its own EWB**, are transported in a **single vehicle**.
- It serves as a single document **summarizing** details of all EWBs for various consignments.

- It simplifies transport documentation, but it does **not have an independent validity period**; each individual e-way bill's validity applies to its respective consignment.
- Transporters can generate this consolidated bill on portal before movement, but its use is optional.

L. Using Info. of EWB for filing GST Returns: Details provided in Part A are automatically made available to regd. supplier on GST portal & can be used for filing GSTR-1. If info. is submitted by unregd. supplier/recipient, he will be electronically notified, provided his mobile no./email available.

M. Cancellation of EWB: EWB can be cancelled electronically on portal **within 24 hours of generation** if goods not transported/incorrect details furnished. Cancellation is not allowed if EWB has already been verified in transit. Also, EWB number remains valid **for 15 days from updating Part B details**.

N. Validity period of EWB: [ODC/MS= Over Dimensional Cargo or multimodal shipment]

Distance within Country	Validity Period from Relevant Date
Up to 200 km	1 day (other than ODC/MS involving transport by ship)
For every 200 km or part thereof thereafter	1 add'l day (other than ODC/MS involving transport by ship)
Up to 20 km	1 day (in case of ODC/MS involving transport by ship)
For every 20 km or part thereof thereafter	1 add'l day (in case of ODC/MS involving transport by ship)

- Relevant date is date on which EWB generated, & validity period is counted from that time, with each day ending at midnight of following day. Example:
 - If EWB is generated at 00:04 hrs. on 14th March, 1st day's validity ends at 12:00 midnight on 15-16 March, 2nd day's validity ends at 12:00 midnight on 16-17 March, and so on.
 - If an e-way bill is generated at 23:58 hrs. on 14th March, 1st day's validity ends at 12:00 midnight on 15-16 March, 2nd day's validity ends at 12:00 midnight on 16-17 March, and so on.
- **Validity starts from 1st entry in Part-B**; subsequent updates to Part-B do not affect validity pd.

O. Extension of validity period: Validity of EWB generally **cannot** be extended, but **exceptions** exist:

- **Commissioner** may extend EWB validity for certain goods, based on Council's recommendations.
- In **exceptional circumstances** (transshipment/delays), transporter can extend EWB's validity. In such cases, transporter must update Part B & provide a detailed explanation for extension. Validity of EWB can be extended **within 8 hours** from the time it expires.

P. Acceptance of EWB:

- EWB details are made available to supplier (if regd.), where Part A info. furnished by recipient/transporter and vice-versa.
- Supplier/recipient must communicate acceptance/rejection of EWB details on common portal.
- Response time is **72 hrs or delivery time, whichever is earlier**. After this, it's deemed accepted.

Q. Situations where e-way bill is not required to be generated

1. Goods Exempted from E-way Bill:

- **LPG** for supply to households & Non-Domestic Exempted Category (NDEC) customers
- **Kerosene** oil sold under PDS
- **Postal** baggage transported by Dept. of Posts
- Natural/cultured **pearls**, precious/semi-**precious stones**, precious metals, or metals clad with precious metal
- **Jewellery**, goldsmiths' and silversmiths' wares, and other articles (except imitation jewellery)
- **Currency**
- Used **personal & household** effects
- **Coral** (unworked and worked)

2. Transported by **Non-Motorised Conveyance**

3. Goods transported from customs port/airport/air cargo complex/land customs station **to ICD/CFS** (inland container depots/container freight stations)

4. Movement within **Specified Areas**: As notified u/R 138(14)(d) of State/UT GST Rules.

5. Goods **exempt** from tax (except de-oiled cake).
 6. **Alcoholic liquor & 5 petroleum products** (petroleum crude, high-speed diesel, petrol, natural gas, ATF)
 7. Goods where supply is treated as no supply under **Schedule III** of the CGST Act.
 8. Goods transported under:
 - **customs bond** from ICD/CFS to a customs port/airport/air cargo complex/land customs stations or b/w custom ports/stations
 - **customs supervision/seal**
 9. Goods being transported are **transit cargo to/from Nepal or Bhutan**.
 10. Goods supplied **by CSD to Unit Run Canteens/authorized customers** or **by Unit Run Canteens to authorized customers**
 11. Supply of heavy water & nuclear fuels **by Dept. of Atomic Energy** to Nuclear Power Corporation of India Ltd. (NPCIL)
 12. Goods moved by **Ministry of Defence**.
 13. Goods transported **by CG/SG/LA by rail**.
 14. **Empty cargo containers** being transported.
 15. Goods moved **within 20 km to/from a weighbridge**, with a delivery challan.
 16. Movement of **empty LPG cylinders** for purposes other than supply.
- R. Documents and devices to be carried by a person-in-charge of Conveyance: He shall carry -
- **Invoice, BoS, or delivery challan** (as the case may be)
 - Copy of **EWB** in physical form/ EWB no. in electronic form or mapped to RFID device on conveyance (except in case of movement by rail, air, or vessel).
 - Copy of Bill of Entry for **imported goods** (also indicate its number and date in Part A of EWB)
- In case of **e-invoice**, IRN embedded in QR code can be presented electronically in lieu of physical tax invoice. When e-invoice is issued, info. in Part A of EWB auto-populates based on e-invoice details.
- In specific cases, Commissioner may permit person-in-charge to carry following instead of EWB:
- Tax invoice, BoS, or bill of entry.
 - Delivery challan (if goods are transported for reasons other than supply).
- Commissioner may require certain transporters to obtain a **unique RFID** & have it embedded on conveyance & map EWB to RFID before movement of goods.
- S. Verification of documents and conveyances:
- Commissioner/authorized officer may direct interception of any conveyance for EWB verification for inter-State/intra-State goods movement.
 - RFID readers will be installed at locations where goods' movement verification is necessary.
 - Verification of vehicles with e-way bills mapped to RFID will be done using RFID readers.
 - Physical verification of conveyances will be carried out by officer authorized by Commissioner.
 - Conveyance suspected of tax evasion can be physically verified by any officer with Commissioner's approval.
- T. Inspection and verification of goods
- **Summary** report of every inspection must be recorded online **within 24 hours in Part A**, & **final** report in **Part B within 3 days (+ 3 days** by Commissioner if sufficient cause)
 - Time for reporting (24 hrs/3 days) is counted from midnight of date the vehicle was intercepted.
 - **No further physical verification** of goods is required in same State/UT once verified, unless specific tax evasion information is made available subsequently.
 - Hard copies of notices/orders issued by tax authority may be shown as proof of initiation of action to another tax authority when required.
 - Only goods and conveyances with violation of GST provisions should be detained or confiscated.

- U. Facility for Uploading Info. regarding Detention of Vehicle: Where a vehicle has been intercepted & detained for a **pd. >30 min.**, transporter may upload said info. in specified form on common portal.
- V. Blocking of e-waybill generation facility: It disables taxpayer's GSTIN from generating EWB **as a supplier**, but can do so as a recipient/transporter. EWB generation is blocked for taxpayer who is:
- **Composition** scheme person fails to furnish self-assessed tax statements for 2 consecutive qtrs.
 - **Regular** scheme person fails to file returns (GSTR-3B) for 2 consecutive tax periods.
 - **Regular** scheme person fails to GSTR-1 (stat. of outward supply) for 2 months or qtrs.
 - Having his GST registration suspended u/R 21A.
- No consignor, consignee, transporter, ECO, or courier agency can furnish Part A of Form GST EWB-01 for outward movement of goods for blocked GSTIN.
 - Jurisdictional Commissioner may **unlock** EWB generation upon receiving application from taxpayer subject to sufficient cause, written reasons, and conditions/restrictions. No rejection order can be issued without providing a reasonable OOBH to taxpayer.
 - Permissions/rejections by State/UT Commissioner are deemed equivalent to those by Central Commissioner.
- W. Consignee/ recipient taxpayer storing goods in the transporter's godown:
- In such case. recipient taxpayer must declare **transporter's godown as an APoB**.
 - Transport from supplier's premises concludes when goods reach transporter's godown (APoB), & validity need not be extended.
 - A **valid EWB** is required for movement from transporter's godown to any other PoB.
 - Requirement of maintaining accounts and records:
 - Transporter: Transporters, as warehouse keepers, must maintain BOA as per Sec. 35 & Rule 58.
 - Recipient: Recipient taxpayers must maintain accounts as per Rules 56 and 57, including goods stored at transporter's godown. They can maintain records of goods stored at transporter's godown (APoB) at their PPoB, avoiding extra compliance for transporters.
- X. Key Points:
- EWB generated in **1 State is valid in another State**.
 - EWB is **invalid without a vehicle no.**
 - Mistakes in EWB **cannot be edited**; it has to be **cancelled and regenerated within 24 hours**.
 - **Vehicle no.** in EWB can be **updated any number of times**.
 - Vehicle no. in EWB **must match the vehicle** carrying the goods during inspection.
 - Multiple invoices require **separate EWBs**, but a consolidated EWB can be generated for 1 vehicle.
 - Expressions like "transported by railways" or "movement of goods by rail" do not include leasing of parcel space by railways.