



**ALL GUJARAT FEDERATION OF TAX
CONSULTANTS**

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INCOME TAX BAR ASSOCIATION

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Date: 10th July 2025

To,
Smt. Nirmala Sitharaman,
Hon'ble Finance Minister
Government of India
North Block,
New Delhi - 110001
E-mail: fmo@nic.in

Respected Madam,

**Subject: Representation related to early release of ITR Utilities for ITR 2, 3, 5,
6 & 7**

1. About the Associations (AGFTC and ITBA):

The All Gujarat Federation of Tax Consultants (AGFTC), established in 1992, stands as the premier regional body representing Advocates, Chartered Accountants, and Tax Practitioners across the State of Gujarat. With a membership base exceeding 2,000 professionals, and with strong institutional affiliations throughout the state, AGFTC plays a vital role in strengthening the professional tax community of Gujarat.

The Income Tax Bar Association, Ahmedabad (ITBA), founded in 1947, is one of the oldest and most respected professional associations in the region. Comprising Tax Advocates, Chartered Accountants, and other Tax Professionals based in Ahmedabad, the association currently boasts a membership of over 1,100 dedicated professionals.

Both AGFTC and ITBA are committed not only to advancing the interests and professional development of their members but also to serving the public by fostering greater awareness of taxation laws and policies. Through regular organization of seminars, lectures, and knowledge-sharing programs, these

associations act as a bridge between citizens and government authorities, promoting legal literacy and constructive dialogue in the field of taxation.

2. Representation related to early release of ITR Utilities for ITR 2, 3, 5, 6 & 7

(a) Current Status:

We, the Income Tax Bar Association and the All Gujarat Federation of Tax Consultants, extend our respectful salutations and convey our heartfelt gratitude to the Hon'ble Finance Minister and the Ministry of Finance for the timely extension of the ITR filing due date for non-audited assesseees for AY 2025-26 up to 15 September 2025. This extension has indeed alleviated considerable time pressures and facilitated compliance for millions of taxpayers.

However, we wish to bring to your urgent attention the continuing non-availability of the utilities for ITR-2, ITR-3, ITR-5, ITR-6, and ITR-7 for AY 2025-26, even in early July 2025. This delay has had cascading adverse effects on numerous stakeholders, being tax professionals, SMEs, corporations, and other entities, whose compliance obligations are looming or have already commenced.

(b) Timely Availability of TDS & AIS/TIS Data:

The Income Tax Department's infrastructure has performed commendably in timely providing TDS and AIS/TIS data for AY 2025-26. These data-sets are already accessible on the e-filing portal and inform taxpayers' advance tax calculations as well as return preparation exercises.

This availability creates an expectation of parallel readiness for all ITR utilities, especially for complex return forms. The withholding tax infrastructure is in place; accordingly, the ITR-2, 3, 5, 6 & 7 utilities for data entry, validation, and uploading ought to also be readily available. The current non-availability therefore represents a disconnect and causes uncertainty among taxpayers and tax practitioners.

(c) Consequences of Delay in Release of ITR Utilities:

Increased Workload During Tax Audit & Colliding Festival Season

Even as the due date for non-audited assesseees is extended to 15 September, there remains a statutory deadline of 30 September 2025 for furnishing tax audit reports under Section 44AB and the revised Form 3CD. The ITR-utility for audited entities necessarily depends on timely availability of Form 3CD provider components, many of which undergo substantial structural changes annually. Delay in utility release leaves assesseees and professionals unable to complete the audit and ITR filing exercise smoothly.

Further, the mid-October 2025 Diwali festival season sees widespread unavailability of clients, finance teams, chartered accountants, and auditors. The audit and filing window already compresses into a severely tight timeframe. Delay in utility publication forces rushed filings, heightening risk of error or incompleteness, and placing undue stress on tax practitioners and taxpayers alike.

Revised Form 3CD & Tax Audit Complexity

CBDT has introduced significant modifications to Form 3CD, including additional schedule disclosures for multiple new things including newly inserted tax provisions, MSME reporting and various financial transactions.

Without the revised Form 3CD section in the ITR-3/6 utility, auditors cannot complete validations or connect data sections during e-filing. This effectively halts the filing process until the utility is properly updated, which is currently delayed.

Knock-on Delay of ITR Filing by Audited Assesseees

Practically, consultants and tax practitioners below Tier 1 cities cannot handle returns of the audited taxpayers (ITR-3, ITR-6) before due date for non-audited assessee. This impacts companies, professional firms, businesses with international transactions, etc., forcing them to delay their compliance processes until the utilities are released. It will cause a pause that can span longer time.

This delay not only tightens timelines but puts immense pressure on stakeholders and adds to the backlog as the audit season ramps up.

Delay in Processing and Refunds

Non-availability of utilities stalls e-filing and submission, which in turn delays the Income Tax Department's processing of returns and issuance of refunds. Many taxpayers, including SMEs and small proprietorships, depend on prompt refunds to address working capital or investment shortfalls. A deferred utility release means refunds are processed with delay, potentially by January-February 2026 rather quite early in mid or end of 2025.

This triggers a monetary setback and erodes taxpayer confidence in prompt delivery of entitled benefits.

Interests under Sections 234B & 234C

The automatic extension of due dates does not reduce interest on tax liabilities accruing due to delayed filings.

These interest charges accrue based on statutory cut-off dates. The procedural delays caused by late utility issuance inadvertently push taxpayers into technical defaults and incurring interest liability through no fault of theirs, diminishing the relief intended by due date extensions.

Impact on GSTR-9 / 9C and GST Compliance

Many taxpayers, particularly those subject to audit and return filing under GST, prepare their annual returns GSTR-9/GSTR-9C in December. These returns require audited ITR figures to reconcile turnover, taxes paid, ITC matching, etc. Delay in ITR filing therefore cascades into the GST compliance cycle, potentially causing Inaccuracy in GST audit statements, Delay in submission or need for revisions & Penalties or notices due to missed filings.

This further tightens the compliance cycle for taxpayers who have to deliver multiple filings across tax regimes.

Adverse Effect on SMEs & Dependent Businesses

Small and medium enterprises typically rely heavily on their tax consultants and auditors for compliance. The compounded delays in audit reports, ITR filings, and refunds convey an uncertain operating environment, affecting:

- Timely loan renewals from banks, which require certified financials and tax filings as preconditions
- Credit rating assessments that depend on up-to-date statutory filings
- The ability to bid on tenders or contracts which require recent audited accounts and tax clearances

Consequently, many SMEs may defer expansions or rollouts pending completion of their statutory compliances which is contrary to the Government's stated objective of fostering growth in Micro, Small & Medium Enterprises.

(d)Representation & Request:

1. The Income Tax Department and technology partner shall come with error free and properly valid utilities of all the ITR and Tax Audit reports as early as possible to ensure the filing is smoothly completed.
2. Given that the 30 September 2025 deadline for tax audit reports is imminent and that the utilities for Form 3CD and audited ITRs remain unavailable, we respectfully propose the Extension of the due date for furnishing tax audit reports (currently 30 September 2025) by 60 days to 30 November 2025. This will allow sufficient time for auditors to prepare revised Form 3CD, integrate it with the ITR utility, and file returns without haste. It would avoid system penalties and interest on account of literal deadline defaults, which are otherwise unfair given the systemic delays.
3. Consequent extension of related compliance due dates, including:
 - Furnishing of ITR-3 / ITR-6 (audited returns) to 31 December 2025.
 - Transfer pricing documentation and international transaction disclosures by the same date.

These ensure holistic resolution of filing tasks in one coherent window.

4. Request

We humbly request you to consider the representation made by AGFTC & ITBA and oblige.

We sincerely hope that the Government under the dynamic leadership of Hon'ble PM Shri Narendra Modi and Hon'ble FM Smt. Nirmala Sitharaman would provide the requisite relief to the taxpayers at the earliest.

Yours sincerely,

For and behalf of

ALL GUJARAT FEDERATION OF TAX CONSULTANTS



Adv. Ashutosh R.
Thakkar
President

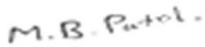


CA Parth Doshi
Hon. Secretary



Adv. Dhires T.
Shah
Chairman:
Representation
Committee &
Direct Tax
Committee

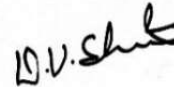
INCOME TAX BAR ASSOCIATION



CA Maulik Patel
President



CA Shivam Bhavsar
Hon. Secretary



Adv. (Dr.) Dhruven Shah
Chairman: Representation
Committee

CC to:

1. Hon'ble Revenue Secretary,
Ministry of Finance,
North Block, New Delhi - 110001
2. Hon'ble Chairman,
Central Board of Direct Taxes,
New Delhi. 110001
3. Hon'ble Pr. Chief Commissioner of Income Tax, Gujarat
Aaykar Bhavan, Income Tax, Navrangpura, Ahmedabad-380009