

GST UPDATES

April 18, 2025



CBIC Instruction for new registration application.

Instruction No. 03/2025-GST dated 17.04.2025

Background

Goods and Services Tax (GST) registration is a mandatory compliance requirement for businesses in India whose aggregate turnover exceeds the prescribed threshold limit or who fall under specific categories as notified by the GST law. Though registration process is entirely online and is administered by the GSTN. It is one of the robust process to prevent registration for fraudulent activities.

Guidelines for processing of application for registration were earlier issued vide instruction No. 03/2023-GST dated 14th June, 2023.

However, as there have been a number of changes in the back office and due to increasing number of registration related complaints, a comprehensive instruction is being issued to take care of the latest developments and to provide clarity to the officers for processing of registration application. Accordingly, in supersession of the aforesaid instruction, Instruction No. 03/2025-GST dated 17.04.2025 is issued.

A. Documents in respect of Principal Place of Business (PPOB)

a. Owned premises by the applicant

- i. latest Property Tax receipt or
- ii. Municipal Khata copy or
- iii. Electricity Bill or
- iv. Water bill or
- v. Any other document prescribed under the State or the local laws which clearly establishes the ownership of the premises.

b. Premises is rented by the Applicant-Appl

licant should upload valid Rent/Lease agreement and Along with agreement, any of below documents of the lessor,

- i. Latest Property Tax receipt or
- ii. Municipal Khata copy or
- iii. Electricity Bill or
- iv. Water bill or
- v. Any other document prescribed under the State or the local laws which clearly establishes the ownership of the premises

No PAN card, Aadhar Card, photograph of the lessor in front of/or inside the property, etc. Shall be demanded by the field officers.

In case Rent/Lease Agreement is not registered, then agreement along with any one of the documents mentioned in the above list and a copy of the identity proof of the lessor should be sufficient.

c. Premises neither rented nor owned by the applicant e g owned by Spouse or relative.

In such case a consent letter in plain paper by the concerned owner of the premises along with a copy of the identity proof of the person granting consent and any document from i to v above would be sufficient.

d. Shared premises with rent agreement: - following documents are required.

- i. Rent agreement.
- ii. Any of the documents from i to v above would be sufficient.
- iii. In case rent agreement is unregistered then ID proof of Lessor is mandatory.

e. In case of rent agreement is not available, the applicant may upload a consent letter in plain paper from the consenter along with his identity proof of the consenter and any of the said documents (i to v above) in support of ownership of the premises of the consenter.

f. In case of rented/leased premises, where rent or lease agreement is not available, an affidavit to that effect along with any document (i to v above) of the lessor would be sufficient.

Note:- Affidavit is to be executed on non-judicial stamp paper of minimum value in the presence of First-Class Judicial Magistrate or Executive Magistrate or Notary Public.

g. If the principal place of business is located in the Special Economic Zone or the applicant is a Special Economic Zone developer, necessary documents/certificates issued by the Government of India are required to be uploaded.

B. Constitution documents for the business: -

| Applicant | Document |
|--|---|
| Partnership firm | Partnership Deed |
| Society, Trust, Club, Gov. Department, AOP, BOI, Local Authority, Statutory Body and Others etc. | Registration Certificate / Proof of Constitution. |

No additional document like Udhyam certificate, MSME certificate, shop establishment certificate, trade license etc, shall be required.

C. Verification and approval process,

a. Document Scrutiny:

Applicants must upload prescribed documents (e.g., photo, business constitution, address proof). Officers must verify completeness, legibility, and authenticity, and cross-verify address proofs through public sources when possible.

- b. **Approval Timeline:**
- i. If not flagged as risky and documents are complete, registration should be approved within **7 working days**.
 - ii. If flagged as risky, Aadhaar not authenticated, or physical verification is deemed necessary, registration must be granted within **30 days** after **physical verification**.
- c. **Physical Verification:** Officers must upload verification reports (Form REG-30) with photos and supporting documents at least **5 days before** the 30-day limit. Verification should confirm the actual existence of the business.
- d. **Clarifications (Form REG-03):** Officers may seek clarifications if:
- i. Documents are illegible/incomplete.
 - ii. Address details are unclear or mismatched.
 - iii. PAN-linked GSTIN is cancelled/suspended.
- e. **Timelines for Notices & Replies:**
- i. REG-03 notice to be issued within **7 working days** (non-risky cases) or **30 days** (risky cases).
 - ii. Applicant must reply in REG-04 within **7 working days**.
 - iii. Officer must approve or reject (via REG-05) within **7 working days** from receipt of reply or expiry of reply period.
- f. **Officer Conduct:** Officers must not seek unnecessary documents or raise queries on minor issues. Deemed approvals due to inaction must be avoided.

- g. **Supervisory Oversight:**
- i. Senior officers must monitor processing, physical verifications, and timelines.
 - ii. Adequate staff must be posted for registration tasks.
 - iii. Trade notices may be issued to clarify acceptable local documentary practices.

Summery

In light of evolving systems and the need to streamline the GST registration process, **Instruction No. 03/2025-GST dated 17.04.2025** provides comprehensive guidance for field officers to ensure uniformity, transparency, and efficiency in handling registration applications. These updated instructions not only address the documentation requirements for different types of business premises and business constitutions but also lay down clear timelines and procedural safeguards for verification, approval, and communication with applicants.

By standardizing the acceptable documents and minimizing discretion at the officer level, this instruction aims **to reduce ambiguity, curb malpractices, and enhance ease of doing business**. It reinforces the need for timely processing, prudent scrutiny, and responsible conduct by tax officers. Moreover, supervisory mechanisms and staffing guidelines have been strengthened to ensure effective implementation of the provisions.

In some of the cases during verification process, some unreasonable information / documents sought by the officer and leading in delay / rejection of application. So, Proper adherence to these instructions will significantly contribute for timely processing of the application and related compliances.