
CA FINAL – PAPER 5

IMPORTANT THEORY

QUESTIONS IN IDT FOR

NOV 24 EXAM

Goods and Services Tax

Question 1:

Cases involving cancellation of registration

Cancellation of registration:

Application by registered person (or) suo-moto cancellation by officer:

1. Transfer or discontinuance of business
2. Change in constitution of business
3. Taxable person no longer liable to be registered

Suo-moto cancellation by officer:

1. Contravention of provisions of Act or Rules#
2. Person opting for composition scheme not filed annual return within 3 months after due date
3. Registered person (other than above) has not filed returns for 6 consecutive months or 2 consecutive quarters.
4. Registration obtained by fraud
5. Obtained voluntary registration and not commenced business within 6 months

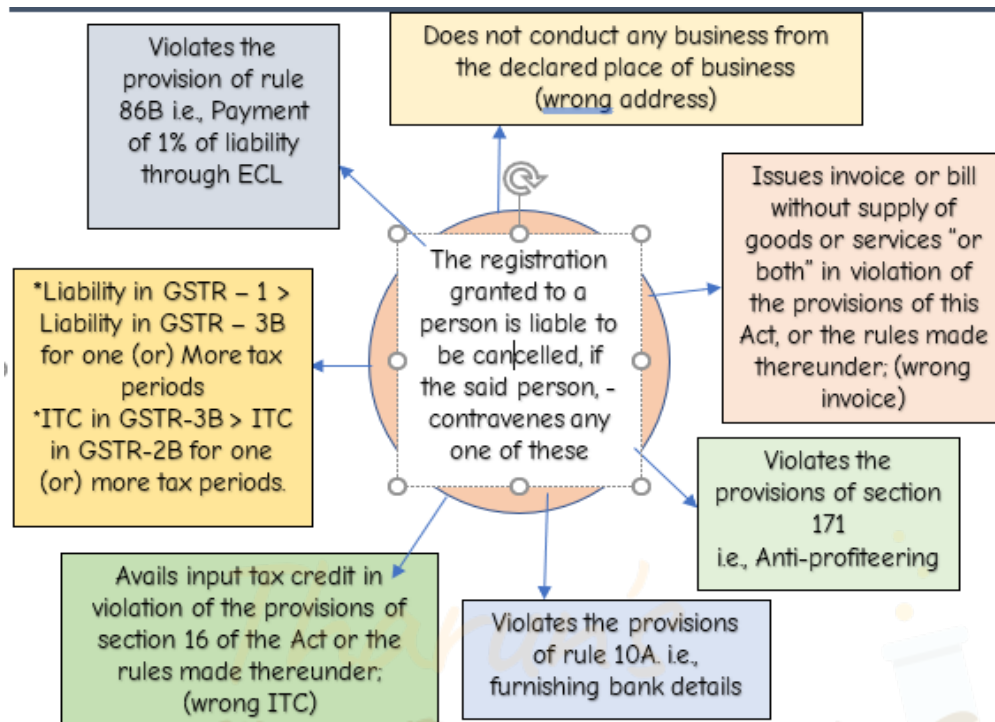
Note:

1. Even, TCS/TDS deductor can make application for cancellation of registration.
2. Aadhar authentication is required in case of application of cancellation of registration

Question 2:

Contravention of provisions resulting in cancellation of registration

#RULE 21 – REGISTRATION TO BE CANCELLED IN CERTAIN CASES



Under section 29, the cancellation of the registration can either be initiated by the Department on their own motion or the registered person can apply for cancellation of their registration. A proviso to section 29(1) has been inserted to provide that once a registered person has applied for cancellation of registration or the proper officer seeks to cancel his registration, the proper

Question 3:

Situation where GSTR-1 is blocked

The blocking of GSTR-1 can occur in specific situations due to non-compliance with GST rules, mainly under Rule 59(6) of the CGST Rules, 2017. Here are the key circumstances under which GSTR-1 is blocked:

1. **Non-filing of Previous Returns:** If a registered taxpayer has not filed GSTR-3B for the previous two tax periods, they are restricted from filing GSTR-1. This rule is aimed at ensuring timely compliance and preventing discrepancies between outward supplies and tax liabilities.
2. **Default in Quarterly Filers:** For taxpayers opting for the QRMP (Quarterly Return Filing and Monthly Payment) scheme, if they fail to file the return for the previous quarter, their GSTR-1 for the subsequent quarter may be blocked.
3. **Rule 88C:** Liability in GSTR-1 > Liability in GSTR-3B for one or more tax periods and intimation is issued in FORM GST DRC 01B and the person has not taken any correction action, such person cannot file GSTR-1 till the time he takes the corrective action by either paying the difference along with interest or providing proper explanation for the difference.
4. **Rule 88D:** ITC in GSTR-3B > ITC in GSTR-2B for one or more tax periods and intimation is issued in FORM GST DRC 01C and the person has not taken any correction action, such person cannot file GSTR-1 till the time he takes the corrective action by either paying the difference along with interest or providing proper explanation for the difference.

5. **Bank details not furnished:** A person who is required to furnish bank details as per Rule 10A i.e., within 30 days from the date of registration or date of filing first GSTR-1, whichever is earlier, has not furnished bank details.

Question 4:

Who are not required to comply with Aadhar authentication for registration

Aadhaar authentication procedure not applicable in following cases:

1. Not a citizen of India
2. Partners other than authorised or managing partner
3. Members other than karta of HUF
4. Members of any company or body corporate or entity other than authorised signatory
5. CG/SG department
6. Local Authority
7. Statutory Body
8. Public Sector Undertaking (PSU)
9. UIN (Unique identification Number) holder

Question 5:

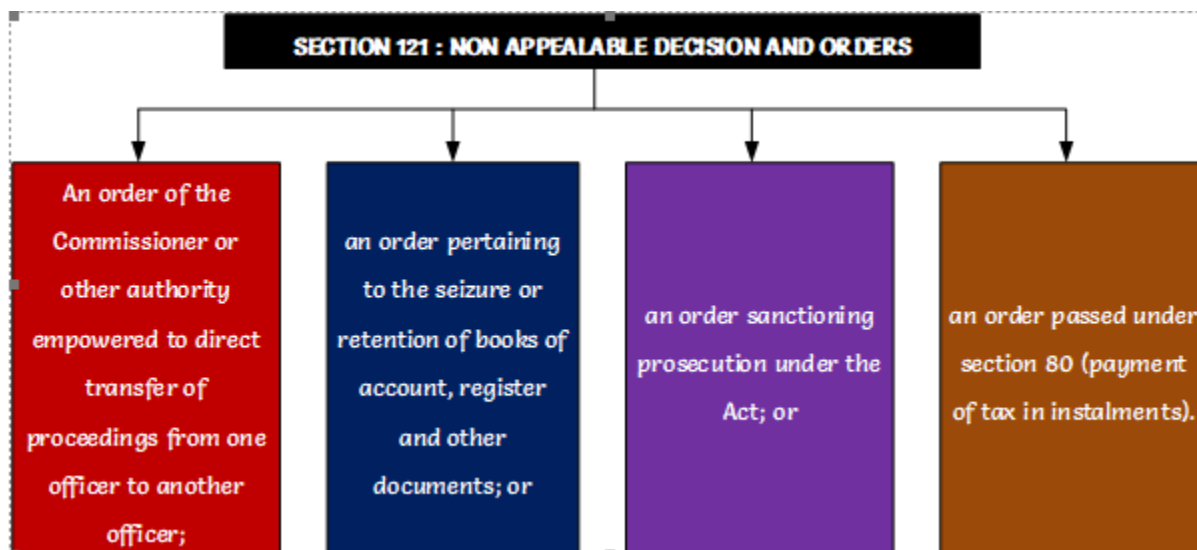
E-Invoice / Dynamic QR Code non-applicability

Exception to mentioning dynamic QR Code in Invoice:

If payment is received before (or) at the time of generating invoice & cross reference of such payment received (In case of cash receipt, the date on which cash is received) is mentioned in invoice

Irrespective of the ATO, E-Invoice not required in case of following suppliers [BIGGEST]	Irrespective of the ATO, QR Code not required in case of following suppliers [BIG TOE]
B = Banking Company/Financial Institution/NBFC	B = Banking Company/Financial Institution/NBFC
I = Insurance Company	I = Insurance Company
G = Goods Transport Agency	G = Goods Transport Agency
G = Government Department & Local Authority	T = Transportation of passengers (Any mode)
E = Exhibition of film in Multiplex Cinema Theatre	O = OIDAR supplier located outside India & making supply to NTOR in India. [QR code not required]
S = SEZ Unit (But SEZ developer is required to issue an E-invoice) [QR code applicable]	E = Exhibition of film in Multiplex Cinema Theatre
T = Transportation of passengers (Any mode)	

Question 6:
Non appellate orders



Question 7:
Revisional authority u/s 108

1. Revisional authority (RA) is appointed for revision of decisions or orders
2. RA may on its own motion (or) upon information received by it (or) on request from commissioner Call for and examine the record of any proceedings, and
 - If it considers that any decision or order passed is erroneous in so far as it is prejudicial to the interest of revenue, and is illegal or improper, or has not taken into account certain material facts
 - He may, stay such order/decision & after making such further enquiry pass an order giving opportunity of being heard, enhancing (or) modifying (or) annulling the said decision/order.
3. **No revision in certain cases:**
 - a) Order had been subject to an appeal. However, RA may pass an order on any point which has not been raised and decided in an appeal
 - b) Order has already been taken for revision
 - c) Order sought to be revised is a revisional order
4. **Time limit for taking the order for revision:**

Appeal filed → 1 year from the date of order in such appeal (or) 3 years from the date of adjudication order, whichever is later

Appeal not filed → After 6 months from the date of adjudication order and within 3 years from such order
5. **Period to be excluded in computing limitation period of 3 years:**
 - a) When the issuance of a revision order is stayed by the order of a Court or Tribunal, the period of such stay shall be excluded in computing the period of limitation of 3 years
 - b) Time spent in the appeal under similar issue in Tribunal to High Court and High Court to Supreme Court

Question 8:

Procedure for advance ruling u/s 98

Difference of opinion among members	In such situation, application shall be referred to AAAR										
Geographical Scope	State Level Authority [There is no Central AAR]										
When application shall be made	Prior to carrying out any activity (or) In respect of ongoing activity by registered or unregistered person										
Fees	₹5,000 (CGST) + ₹5,000 (SGST)										
Withdrawal of application	No Express provision										
Time limit for ruling	90 days from the date of application										
<table border="1" style="width: 100%;"> <tr> <th colspan="2" style="text-align: center;">Eligible Questions</th> </tr> <tr> <th colspan="2" style="text-align: center;">Ineligible</th> </tr> <tr> <td style="width: 50%; text-align: center;">POS</td> <td style="width: 50%; text-align: center;">Offences, Penalties</td> </tr> <tr> <td style="text-align: center;">Refund</td> <td style="text-align: center;">Audit & Auditor</td> </tr> <tr> <td style="text-align: center;">Returns</td> <td></td> </tr> </table>	Eligible Questions		Ineligible		POS	Offences, Penalties	Refund	Audit & Auditor	Returns		<ol style="list-style-type: none"> 1. Supply → Composite vs. Mixed Supply 2. Tax liability determination (Applicability rate) → Composition Scheme covered 3. Registration 4. Classification 5. Valuation 6. Time of Supply 7. Input Tax Credit 8. Applicability of Notifications (Exemptions)
Eligible Questions											
Ineligible											
POS	Offences, Penalties										
Refund	Audit & Auditor										
Returns											
Rejection of application	If the matter is pending in or decided by any Court or Tribunal										
Difference of opinion among members	It shall be deemed that Advance Ruling is not possible on the issue										
Geographical Scope	State Level Authority (Separate AAAR for each state)										
Time limit for appeal	30 days + 30 days										
Fees	₹10,000 (CGST) + ₹10,000 (SGST)										
Time limit for ruling	90 days from the date of application										

Question 9:

Exceptions to information obtained by public servant should not be disclosed u/s 158

As per Section 158 of the CGST Act, 2017, information obtained by a public servant should not be disclosed except in certain cases. Here are the main exceptions:

1. **Disclosure in the Public Interest:** Information can be disclosed if it serves the public interest. For example, disclosing tax information might be permitted if it's necessary to prevent tax evasion or fraud that could impact the economy or public welfare.
2. **Legal Proceedings:** Information can be disclosed in the course of a legal proceeding. For instance, if required by the court or for any proceedings under the CGST Act, information may be shared as evidence or for judicial scrutiny.
3. **Consent of the Concerned Person:** If the individual or entity to whom the information pertains consents to the disclosure, a public servant may share the information.
4. **Specific Authorization by Law:** In some cases, the law itself may authorize or mandate disclosure. For example, certain statutory requirements or authorized disclosures to government departments are permissible.
5. **Disclosure to Other Tax Authorities:** Information can be shared with other tax authorities, such as customs or state GST authorities, to ensure compliance and enforcement under respective tax laws.

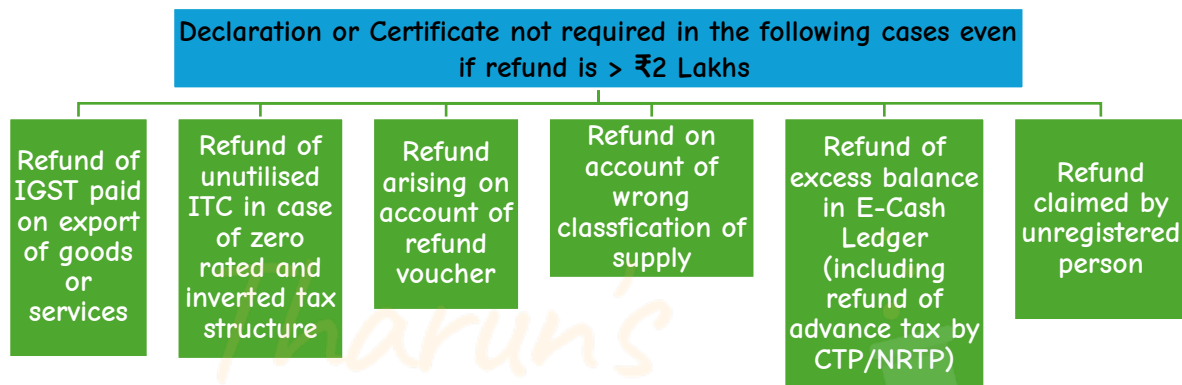
Question 10:

Exceptions to doctrine of unjust enrichment in case of refund under GST

- ▶ Refund subject to condition that there is no unjust enrichment = Refund shall not be granted, if registered person fails to prove that burden is not transferred to recipient.
- ▶ To establish that there is no unjust enrichment, a declaration by registered person required if the amount of refund \leq ₹2,00,000 and if the amount of refund $>$ ₹2,00,000 a certificate from a CA/CMA required to be filed.

Note:

If declaration or certificate not Submitted, refund application cannot be filed and such amount shall be credited to consumer welfare fund.



Question 11:

Situations where TDS is not applicable

- If the Supplier is unregistered
- If location of supplier and place of supply in the same state, but the deductor is in another state.
- Supply to a person other than notified recipient.
- Supply is exempted or Non-Taxable.
- Supply comes under RCM in hands of notified recipient.
- Supply between notified recipients

Question 12:

Situations where TCS is not applicable

- If the supplier is unregistered
- If payment is not collected by ECO from recipient
- If ECO is liable to pay GST u/s 9(5)
- Sales returns
- Supply is exempted or Non-taxable

Question 13:

Areas where CA has to ensure ethics under GST

ADVISORY ↓	COMPLIANCE ↓	LITIGATION ↓
S – Structuring the transactions U – Understanding clients operations R = Registration A = Assess the impact on supply chain, pricing strategies & financial reporting.	T = TDS/TCS R = Returns A = Anti-profiteering C = Certifications E = E-Way Bill R = Records	Appear before ➤ GST Officer (or) ➤ Appellate authority (or) ➤ GSTAT

Question 14:

Rule 88C & Rule 88D – procedure to be followed of GSTR – 1 liability > GSTR-3B liability (or) ITC in GSTR-3B > ITC in GSTR-2B

Criteria	88C	88D
Trigger Point	Difference in Outward Supply – Liability declared in form GSTR 1 exceeds the tax payable in form GSTR 3B by such amount and such percentage	Difference In ITC claimed - Credit availed in form GSTR 3B exceeds the credit as per auto generated statement in Form GSTR 2B
Communication by Department	Part A- GST DRC – 01B	Part A - GST DRC - 01C
Communication by	Upload on the Portal + E-Mail	Upload on the Portal + E-Mail
Response Time	7 Days	7 Days
Response to be filed in	Part B -GST DRC -01B	Part B - GST DRC – 01C
Options available	1. Pay the Difference 2. Explain the difference 3. Partial payment and explain the balance	1. Pay the Difference 2. Explain the difference 3. Partial payment and explain the balance
If no response / unsatisfactory response	Recovery of Tax under Section 79 + liability posted in Electronic liability ledger	SCN under Section 73/74
Impact on Filing of Returns / Access to GST Portal	1. Not allowed in file returns in Form GSTR 1 2. Rule 59 - Once GSTR 1 not filed. GSTR 3B filing gets blocked 3. Rule 138E – If GSTR 1 not filed for two consecutive tax periods, E-Way Bill facility gets blocked 4. Rule 21A – Suspension of registration	1. Not allowed in file returns in Form GSTR 1 2. Rule 59 - Once GSTR 1 not filed. GSTR 3B filing gets blocked 3. Rule 138E – If GSTR 1 not filed for two consecutive tax periods, E-Way Bill facility gets blocked 4. Rule 21A – Suspension of registration

Question 15:

Restrictions where ITC not available even though reflected in GSTR-2B u/s 38

ITC may not available to the recipient as per GSTR – 2B even though invoice furnished in Suppliers GSTR-1 in the following cases.

- I. Suppliers is a newly registered business under GST.
- II. Suppliers has filed GSTR-1 by not GSTR-3B
- III. Suppliers liability in GSTR-1 is greater than GSTR-3B
- IV. Suppliers ITC in GSTR-3B is greater than GSTR-2B
- V. Supplier has received demand notice & defaulted in the payment of tax (default continues)
- VI. Supplier has not fulfill the conditions of Rule 86B

Question 16:

Situations where ITC cannot be utilised under Rule 86A

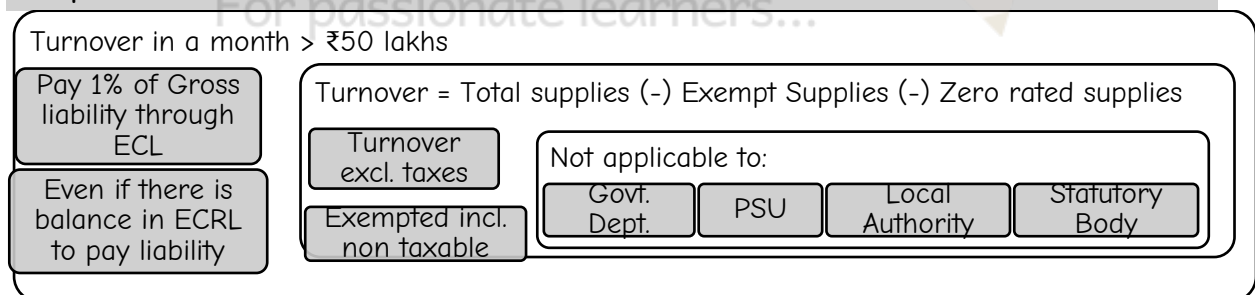
As per Rule 86A of CGST Rules, 2017 GST officer has power to disallow the setoff of provisional credit against GST payable, **for a maximum period of 1 year**, if he is of the opinion that –

- ITC availed against an invoice issued by a supplier, who is not in existence (or) not doing business from the place where supplier has obtained registration.
- ITC availed by a recipient who is not in existence (or) not doing business from the place where recipient has obtained registration.
- ITC availed without receipt of goods
- ITC availed against an invoice, for which supplier has not paid tax to Government.
- Invoice or Debit note against which ITC availed is not in existence.

Note: Upon expiry of 1 year from the date of restriction, the registered person shall be able to debit input tax credit so disallowed, subject to any other action that may be taken against such person.

Question 17:

Exceptions to Rule 86B



The above Rule is not applicable also in the following cases:

1. Such person (or) proprietor (or) Karta (or) M.D (or) any of its 2 partners Deposited income tax of > ₹1 lakh in each of the last 2 years.
2. Received a refund of > ₹1 lakh in preceding FY (Refund of unutilized ITC)
3. Paid > 1% of the total output tax liabilities through cash ledger calculated cumulatively upto the month in the financial year

Question 18:

Access to business premises u/s 71

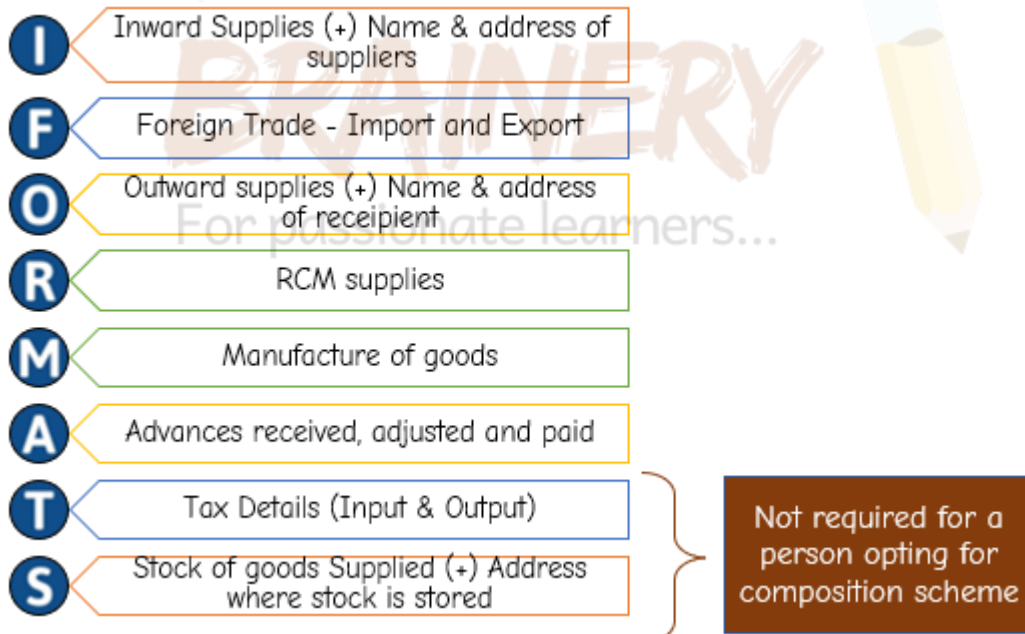
Under Section 71 of the CGST Act, 2017, tax authorities have specific rights regarding the access to business premises. This section allows the officer to inspect business premises to ensure compliance with GST provisions, especially for records, documents, and stock verification.

1. **Authorized Officer Access:** An officer authorized by the government may have access to any place of business of a registered person to inspect books of accounts, documents, computers, or any relevant records.
2. **Scope of Inspection:** The inspection can involve examining goods, services, or stocks to verify their compliance with the GST Act, including for inventory checks or to validate the records being maintained.
3. **Duration and Timing:** The authorized officer can conduct such access and inspection during business hours. However, in special circumstances, access may be allowed at other times if deemed necessary by the authorities.
4. **Purpose of Inspection:** The primary purpose is to ensure the correctness of tax liability, detect tax evasion, verify input tax credit, and confirm compliance with GST provisions.
5. **Requirement of Notice:** Generally, a notice may be issued in advance, informing the taxpayer of the proposed inspection. However, in cases where immediate access is needed, prior notice may not be required.
6. **Consequences of Non-compliance:** If the taxpayer does not comply with requests for access or inspection under Section 71, it can lead to penalties or further investigations.

Question 19:

Various accounts & records to be maintained

Sec. 35 - Under GST, every registered person is required to maintain correct accounts of the following details at the principal place of business and additional place of business (relating to that place) specified in the registration certificate



Question 20:

Situations where composition scheme is not applicable
(The Following supplies should not be made during CY)

- S** Service providers (Whether taxable or exempted) other than (a) restaurant service providers; (b) Services upto a limit allowed
- N** Non resident taxable Person (NRTP)
- I** Interstate supplier of goods or services (Whether taxable or exempted)
- N** Non Taxable Supplies (i.e. Alcoholics Liquor for human consumption & petroleum products)
- E** Supplier of Goods or Services through E Commerce Operator
- R** Purchases from Unregistered Supplier held in stock on the date of opting for composition scheme on which GST not paid under RCM u/s 9(4)
- C** Casual Taxable Person
- M** Manufacturer of certain notified goods - Icecream, Edible ice, Pan masala, Tobacco & Tobacco products, Aerated Waters, bricks & roofing tiles

Note: Person making supply of goods through an E-Commerce Operator can opt for Composition Scheme u/s 10(1) or 10(2A).

For passionate learners...

CUSTOMS & FTP

Question 1:

Advance authorisation for annual requirement

ADVANCE AUTHORIZATION FOR ANNUAL REQUIREMENT AND ELIGIBILITY CONDITIONS:

- Advance Authorization for Annual Requirement shall only be issued for items notified in SION and it shall not be available in case of adhoc norms under Self-Declared
- Authorizations where SION does not exist.
- Advance Authorization for Annual Requirement shall also not be available in respect of SION where input is notified.
- Exporters having past export performance (in at least preceding two financial years) shall be entitled for Advance Authorization for Annual requirement.
- Entitlement in terms of CIF value of imports shall be upto 300% of the FOB value of physical export and / or FOR value of deemed export in preceding financial year or Rs 1 Crore, whichever is higher.

Question 2:

Exceptions to doctrine of unjust enrichment

EXCEPTIONS TO THE DOCTRINE OF UNJUST ENRICHMENT

- Drawback of duty payable under sections 74 and 75;
- Export duty as specified in section 26;
- Duty and interest on imports made by an individual for his personal use;
- Duty paid in excess by the importer before an order permitting clearance of goods for home consumption is made where:
 - i. such excess payment of duty is evident from the Bill of Entry in the case of Self assessed
 - ii. bill of entry; or
 - iii. the duty actually payable is reflected in the reassessed Bill of Entry in the case of Reassessment.

Question 3:

Circumvention/Absorption of ADD/ASD

Circumvention of ASD & ADD:

Where the Central Government, on such inquiry as it may considers necessary, is of the opinion that circumvention of Anti-Subsidy Duty (or) Anti-Dumping duty has taken place, by either of the following ways: -

- i. by altering the description or name or composition of the article on which such duty has been imposed
 - ii. by import of such article in an unassembled or disassembled form
 - iii. by changing the country of its origin or export or
 - iv. in any other manner, whereby the ASD (or) ADD so imposed is rendered ineffective
- it may extend the ASD (or) ADD to such other article also from such date not earlier than the date of initiation of the inquiry, as the Central Government may, by notification in the Official Gazette, specify.

Absorption of ASD & ADD:

Where the Central Government, on such inquiry as it may consider necessary, is of the opinion that absorption** of ASD (or) ADD has taken place whereby the anti-dumping duty so imposed is rendered ineffective, it may modify such duty to counter the effect of such absorption, from such date, not earlier than the date of initiation of the inquiry, as the Central Government may, by notification in the Official Gazette, specify.

**absorption of anti-dumping duty is said to have taken place, if there is a decrease in the export price of an article without any commensurate change in the cost of production of such article.

Question 4:

RODTEP Scheme

REMISSION OF DUTIES AND TAXES ON EXPORTED PRODUCTS (RODTEP) SCHEME:

- Refund to exporters central, state and local duties/taxes that were so far not being rebated/refunded (Eg: Corporation tax, municipal tax, mandi tax, Local body tax, garbage tax etc.,)
- Refund credited to Electronic Duty Credit ledger through e-Scrip, maintained under Sec. 51B of Customs Act, 1962 which can be used only for payment of Basic Customs Duty on import (or) can be transferred to other importers
- The rebate under the scheme shall not be available in respect of duties and taxes already exempted or remitted or credited.
- Under the scheme, a rebate would be granted to eligible exports at a notified rate as a % of FOB value with a value cap per unit of the exported product, wherever required, on export of items which are categorized under the notified 8 digit HS code. However, for certain export items, a fixed quantum of rebate amount per unit may also be notified.
- The rebate allowed is subject to the receipt of sale proceeds within time allowed under the FEMA, 1999 failing which such rebate shall be deemed never to have been allowed. The rebate would not be dependent on the realization of export proceeds at the time of issue of rebate.
- If the sale proceeds are not realized within the time allowed under FEMA, then the rebate granted shall be recovered from the person to whom the rebate is granted, even if such duty credit is transferred to any person.
- Ineligible supplies/Items/Categories under the scheme:
 - i. Export of imported goods
 - ii. Exports through transshipment
 - iii. Exported goods subject to minimum export price or export duty
 - iv. Restricted goods for export as per ITC (HS)
 - v. Prohibited goods for export as per ITC (HS)
 - vi. Deemed Exports
 - vii. Supplies of products manufactured by DTA units to SEZ/FTZ units
 - viii. Products manufactured by Customs bonded warehouse

Question 5:

Status Holder

Export Performance criteria in terms of FOB/FOR value in \$ - Star Export House (EH)

1 star EH = \$ 3 million

2 star EH= \$ 15 million

3 star EH= \$ 50million

4 star EH= \$ 200 million

5 star EH= \$ 800 million

Benefits to status holders

[WIPES] [Made in India] [Exempted]

Warehouse licence to 2 star and above

Input Output Norms on priority i.e. within 60 days by norms committee

Preferential treatment and priority in handling

Exports free of cost (Except gems & gold jewellery)

Self declaration w.r.to authorization and customs clearances

"Made in India" self certification for 3 star and above

Exempted from furnishing bank guarantee & compulsory negotiation of documents*

Question 6:

Authorised economic operator

Under AEO programme of Indian Customs, a business entity engaged in international trade is granted AEO status if it is approved by Customs as compliant with supply chain security standards based on World Customs Organization's SAFE framework Standards.

Such entities are considered as trusted trade partner of Indian customs

Question 7:

Situations where provisional assessment can be restored

1. Importer/Exporter unable to do self-assessment
2. Proper officer deems it necessary to carry out chemical examination or test
3. Necessary documents not produced before CO and such CO wanted to carry out further enquiry
4. Necessary documents produced before CO but such CO wanted to carry out further enquiry

Question 8:

Conditions for concession w.r.to re-importation

If goods are imported into India after exportation therefrom, such goods shall be liable to duty and be subject to all the conditions and restrictions, if any, to which goods of the like kind and values are liable or subject, on importation thereof.

It implies that goods manufactured or produced in India, which are exported and thereafter reimported are treated on par with other goods, which are otherwise imported.

Sec. 12 is the charging section for levy of Customs Duty. It provides for levy of import duty on goods imported into India. It does not make any distinction between import and re-

import. Sec.20 has been drafted to make it clear that CG would like to levy import duty on reimportation also by treating it as FRESH IMPORTATION

Question 9:
Deferred payment of customs duty

Central Government, may by notification permit certain class of importers to make deferred payment of customs duty on imports.

- The eligible importer shall intimate the principal commissioner, their intention to avail the said benefit.
- The principal commissioner shall upon being satisfied with the eligibility, shall allow the importer to pay the duty on deferred basis.
- An eligible importer who fails to pay duty in full by the due date more than once in a period of 3 consecutive months, shall not be permitted to make deferred payment

If any Importer or Exporter or his Authorised Representative or Customs Broker contravenes any provision of these regulations or abets such contravention, or fails to comply with any provision of these regulations, he shall be liable to a penalty which may extend to ₹ 50,000/-

Question 10:
Electronic Cash ledger & electronic duty ledger credit ledger in customs
ELECTRONIC CASH LEDGER (ECL) FOR PAYMENT OF DUTY, INTEREST ETC., [SEC. 51A]

- 1) Every deposit made towards duty, interest, penalty, fee or any other sum payable by a person under the provisions of this Act or under the Customs Tariff Act, 1975 or under any other law for the time being in force or the rules and regulations made thereunder, using authorised mode of payment shall, subject to such conditions and restrictions, be credited to the electronic cash ledger of such person, to be maintained in such manner, as may be prescribed.
- 2) The amount available in the electronic cash ledger may be used for making any payment towards duty, interest, penalty, fees or any other sum payable under the provisions of this Act or under the Customs Tariff Act, 1975 or under any other law for the time being in force or the rules and regulations made thereunder in such manner and subject to such conditions and within such time as may be prescribed.
- 3) The balance in the electronic cash ledger, after payment of duty, interest, penalty, fee or any other amount payable, may be refunded in such manner as may be prescribed.
- 4) Notwithstanding anything contained in this section, if the Board is satisfied that it is necessary or expedient so to do, it may, by notification, exempt the deposits made by such class of persons or with respect to such categories of goods, as may be specified in the notification, from all or any of the provisions of this section

ELECTRONIC DUTY CREDIT LEDGER (EDCL) FOR DUTY CREDIT [SEC. 51B]:

- 1) The Central Government may, by notification in the Official Gazette, specify the manner (Not yet specified) in which it shall issue duty credit,—
 - a) In lieu of remission of any duty or tax or levy, chargeable on any material used in the manufacture or processing of goods or for carrying out any operation on such goods in India that are exported; or
 - b) In lieu of such other financial benefit subject to such conditions and restrictions as may be specified therein.
- 2) The duty credit issued under sub-section (1) shall be maintained in the customs automated system in the form of an electronic duty credit ledger of the person who is the recipient of such duty credit, in such manner as may be prescribed (Not yet prescribed).

- 3) The duty credit available in the electronic duty credit ledger may be used by the person to whom it is issued or the person to whom it is transferred, towards making payment of duties payable under this Act or under the Customs Tariff Act, 1975 in such manner and subject to such conditions and restrictions and within such time as may be prescribed (Not yet prescribed).

