

CBIC issues guidelines to streamline the GST registration process

21 April 2025

The Central Board of Indirect Taxes and Customs (CBIC) has issued instructions¹ to standardise and streamline the GST registration process, suppressing its earlier instructions². The revised guidelines aim to prevent registration-related fraud while avoiding undue harassment of genuine applicants.

The key guidelines are as under:

A. Documents standardisation

- To ensure consistency and ease in processing registration applications, officers are advised to strictly rely on the indicative list of documents outlined in FORM GST REG-01. In case any additional document is required, the officer shall seek it only after the approval of the concerned Deputy or Assistant Commissioner.
- Documents in respect of the principal place of business (PPOB) to be sought from the applicant while processing applications:**

Nature of premise	Documents requirement
Owned premises	<ul style="list-style-type: none"> Any one document of the ownership proof, such as an electricity bill, a water bill, a property tax receipt, a municipal khata copy, or any other document prescribed under the state or the local laws, which clearly establishes the ownership of the premises. Physical submission of original documents is not required.
Rented premises	<ul style="list-style-type: none"> In case of a registered rent/lease agreement, the agreement, along with any one proof of the ownership of the lessor, clearly establishing his ownership. PAN/Aadhaar/photo of the lessor in front of/or inside the property is not required. In case of an unregistered rent/lease agreement, the agreement, along with any one ownership document, and a copy of the identity proof of the lessor. In cases where the electricity or water connection is registered in the name of the applicant (tenant), the document evidencing the same, along with the rent agreement, shall be considered sufficient valid proof. In cases where a rent/lease agreement is not available, an affidavit is to be executed on non-judicial stamp paper of minimum value in the presence of a First-Class Judicial Magistrate, an Executive Magistrate or a Notary Public,

¹ Instruction No. 03/2025 dated 17 April 2025

² Instruction No. 03/2023 dated 14 June 2023

	along with any one of the ownership documents in support of the possession of the premises.
For premises where the ownership is with a spouse, relative, etc.	A consent letter on plain paper by the owner of the premises, along with his identity proof and any one of the documents evidencing the ownership.
Shared premises	<p>Rent/lease agreement available</p> <ul style="list-style-type: none"> In case of a registered rent/lease agreement, the agreement, along with one ownership proof of the lessor, which clearly establishes the ownership. In case of an unregistered rent/lease agreement, the agreement, along with any one ownership document and an identity proof of the lessor. <p>Rent/lease agreement not available</p> <ul style="list-style-type: none"> A consent letter in plain paper from the consentor, along with his identity proof and any one of the documents evidencing the ownership.
PPOB in SEZ³ or the applicant as SEZ developer	Necessary documents/certificates issued by the government of India.

- **Documents in respect of the constitution of the business to be sought from the applicant while processing applications:**
 - For partnerships: If the applicant is one of the partners, the Partnership Deed alone is adequate. No further documents, such as an MSME certificate, Udyam certificate, shop establishment certificate, or trade licenses, are required.
 - For societies, trusts, clubs, etc.: A registration certificate or proof of constitution is required.

B. No presumptive queries

The officers handling registration applications should not ask any presumptive queries that are not related to the documents or information submitted by the applicant, such as:

- The residential address of the applicant/managing director/authorised signatory is not in the same state of GST registration,
- The HSN code of goods mentioned by the applicant is banned/prohibited for sale in the state of GST registration,
- The activity mentioned by the applicant cannot be conducted from the premises.

C. Timeline and manner of processing applications

- The proper officer shall scrutinise the documents uploaded by the applicant to ensure that the documents are legible, complete, and relevant. The authenticity of the documents furnished as proof of address may be cross verified from the publicly available sources, such as websites of the concerned authorities⁴.
- In cases where the applicant has not been flagged as risky on the common portal, the officers should approve the application within 7 working days of submission.
- In case of risk-flagged or Aadhaar-not-authenticated cases, the registration shall be granted within 30 days of submission of the application after physical verification of the place of business. Furthermore, in cases where the

³ Special economic zone

⁴ Land registry, electricity distribution companies, municipalities and local bodies etc.

officer deems it fit to carry out physical verification, the approval of the officer not below the rank of Assistant Commissioner will be mandatory.

- The officer must ensure that the physical verification report, along with supporting documents and photographs, is uploaded in FORM GST REG-30 at least 5 days before the 30-day deadline from the date of submission of application.

D. Additional clarifications/documents

- The proper officer may seek clarifications or information, or documents in FORM GST REG-03 in the following cases-
 - Incomplete/illegible documents,
 - A mismatched address or document uploaded does not appear as valid proof, or incomplete/vague addresses.
 - Suspended/cancelled GSTINs linked to the PAN of the applicant.
- The proper officer shall issue a notice electronically in FORM GST REG-03 within 7 working days in cases where the application is flagged non-risky or 30 days in cases where the application is flagged risky.
- The applicant shall furnish a reply in FORM GST REG-04 within 7 working days from the date of receipt of the notice. In case where the proper officer is satisfied, he shall approve the application within 7 working days from the receipt of reply. However, if he is not satisfied or no reply is received, he may reject the application in FORM GST REG-05 within 7 working days, citing recorded reasons.

Our comments

These guidelines reflect a positive shift towards simplifying the GST registration process by providing clear, uniform procedures. It addresses the concerns around inconsistent practices and unnecessary documentation, aiming to create a more transparent and taxpayer-friendly environment.

The overall impact of these measures will depend on their effective ground-level implementation, regular training of officers, and internal oversight.

Additionally, the Aadhaar-based risk profiling mechanism and system-generated flags need to be periodically reviewed to avoid the unintended flagging of genuine businesses.

**Connect
with us on**



@Grant-Thornton-Bharat-LLP



@GrantThorntonIN



@GrantThorntonBharat



@GrantThorntonBharatLLP



@Grantthornton_bharat



GTBharat@in.gt.com

© 2025 Grant Thornton Bharat LLP. All rights reserved.

Grant Thornton Bharat LLP is registered under the Indian Limited Liability Partnership Act (ID No. AAA-7677) with its registered office at L-41 Connaught Circus, New Delhi, 110001, India, and is a member firm of Grant Thornton International Ltd (GTIL), UK.

The member firms of GTIL are not a worldwide partnership. GTIL and each member firm is a separate legal entity. Services are delivered independently by the member firms.

GTIL is a non-practicing entity and does not provide services to clients. GTIL and its member firms are not agents of, and do not obligate, one another and are not liable for one another's acts or omissions.