

FAQS ON E-INVOICE ROLLOUT

<u>TOPIC</u>	<u>QUESTIONS</u>	<u>RESPONSE</u>
Offshore access to IRP	Can a foreign service provider integrate with IRP?	Yes, but only from within the shores of India.
	If yes, where can the integration specifications be found?	The specifications are to be released shortly. They will be available through links on the gst.gov.in website.
	If no, is GSP the right party to integrate against? What are GSP's responsibilities and liabilities in such setup towards the private service provider?	The APIs will be available over internet. GSPs are not the only entities who will be provided the API access. It will be widely made available to businesses of their software service providers.
ASP	We saw a term "Application Service Provider". What is the definition of this and how can one become ASP?	ASPs are software service providers who route their GST traffic through GSPs. Any software provider of financial services in the indirect tax domain can push data to GST system through GSPs. As far as IRP is concerned, access will be provided over internet. No such category of GSP/ASP will be created for access to IRP.
IRP - Bulk e-invoice	Is batch (bulk) submission of e-invoices to IRP allowed? We saw that this will be enabled in API based mode.	APIs will permit upload of JSON payloads. The invoices shall be accepted one at a time, though you may push invoices sequentially. The system shall be designed so as to scale and respond to API requests so as to enable the acceptance of millions of invoices per day, to start with.
IRP	What indicates for the supplier (and respectively) buyer that IRP has approved the e-invoice?	The IRP will respond with a signed IRN to the seller. IRP will also return a QR code, with digital signatures of the IRP. The QR code content will be as published in the FAQs on our website (www.gstn.org/e-invoice).
	The fact that QR code was assigned and IRN signature added?	Yes. As described above and in the FAQs. Disclaimer QR code will not have status of invoice.
	Or will there be another artefact returned?	No.

	Or the only way to ensure the validity of e-invoice is by manually logging into GSTN portal and manually / visually reviewing invoices available in the portal?	No. As described above.
IRP Validations	Can IRP reject the submitted invoice?	IRP will validate for GSTIN existence (of seller and buyer) and de-duplication of the invoice. If non-existent GSTIN and/or a duplicate invoice is found, the invoice will be returned with relevant error codes, without registering it.
	If yes, what will be returned to the supplier?	Error codes.
	What validations will IRP be performing?	IRP will validate for only GSTIN correctness and whether invoice already exists in the GST system. (This validation of existence in GST system will be based on the GSTIN-InvoiceNumber-typeofdocument-FY combination, which also are used for the IRN generation)
Signing of JSON by seller	Is the supplier required to sign JSON before submitting it to the IRP?	It is optional.
IRP	Will the IRP return both signed JSON and signed PDF? Or just JSON?	IRP will return the signed JSON. No PDF will be returned.
	Whose digital certificate will be used to sign the invoice- taxpayer's and or third parties along with the IRP's, total of 1 or 2 signatures?	The signature will be of IRP.
	How can the digital certificate be uploaded into IRP?	The digital certificate is not required (this is kept with the user). The signed (optional) JSON will be received at the IRP.
	What are other technical requirements to e-signature?	No other technical requirements are there. The seller can sign the JSON and upload it with the signature placed in the optional placeholder for the signature.
Mailing by IRP	What will IRP be email distributing to the buyer- JSON or PDF? Or both?	No mailing of the e-invoice will be done by IRP.

	What happens if the email bounces (does not reach the recipient)?	As above.
Business query	Is the supplier allowed to distribute the e-invoice to the buyer?	Yes.
	If yes, what must alt. is allowed to be distributed- the JSON, the PDF or both?	As deemed fit by the seller. However, in order to make use of the e-invoice schema, it should be shared in the JSON format so that it can be read by the ERP of the buyer and straight away visible in the buyer's relevant books.
	Is the supplier allowed to create and distribute business invoice, i.e. file that contains other elements in excess of what is required for clearance with IRP?	The e-invoice schema has mandatory and optional parameters. The optional parameters can also be sent by the seller to the buyer as per the published e-invoice schema and needed by business need.
	Are there any requirements to how non-Tax invoice must be marked up?	The invoice having no tax component is generally known as bill of supply. Thus, challan and bill of supply are not required to obtain IRN.
Changes in law / Rules	There are inconsistencies between content requirements of the published invoice template and the GST law. When and how will this be addressed?	These will be addressed by relevant notifications and rule changes. Relevant provisions of the law will be amended.
IRN	As IRN can be created by the supplier / supplier's vendor directly:	Yes.
	Where can we find detailed specifications for this?	IRN will be generated by IRP only. It is not required to be generated by the business. Just for information, SHA256 is the algorithm that is to be used to generate the IRN using 3 parameters viz: GSTIN of seller, invoice number of seller, financial year.
	Who has to apply for this, the supplier or the technology provider?	As answered above.
Changes in law / Rules	In the current legislation it is required to issue invoice triplicate [two documents marked accordingly] for sale of goods and invoice duplicate [two documents marked accordingly] for sale of services.	

	Will this requirement be abolished for all taxpayers?	The rules are proposed to be changed so as to address these issues.
	Will this requirement be abolished only for those taxpayers issuing invoices via the IRP system? In other words, will there be two parallel invoicing processes?	As above.
	The sub rules mandate signing of invoice by seller. Will this be amended?	Signing of invoice is also based on the business need and relationship between buyer and seller. This need shall continue as per existing business flow. Signing of the json payload to IRP has already been answered to be optional (see response above).
Invoice PDF	Invoice legibility:	
	Under the current regulations, invoice legibility must be ensured and use of PDF is strongly recommended.	QR code will provide the requisite and relevant information about the invoice. PDF will not be returned by IRP. PDF can be generated by the seller using the signed QR code that will be returned by the IRP.
	How does this requirement look under the new regulations?	The machine readability will eliminate the need for printing. Moreover, the QR code will enable to validate the important contents of the invoice as registered by the IRP.
Other Documents	Which documents are exactly included in the scope of the mandate?	
	What are the requirements for other document types, such as credit/ debit note, ISD invoice, Bill of supply, Delivery challan, Receipt voucher, advance receipt, Payment voucher, Self-invoice?	ISD invoice and ISD credit note are the documents issued by input service distributor ; therefore, IRN will also be required on these documents as per provisions of the law.
	What applies to export transactions / invoices?	Exporter has also to issue tax invoice which is required to be reported like any other transaction. It is applicable in export invoices.

	What applies to import transactions / invoices?	Creator of document is required to generate the e-invoice. Hence bill of entry generated by customs on import of goods is not required to obtain IRN.
	The April 1, 2020 mandate, Are there any exceptions, e.g. armed forces, banks, telecom companies?	From Jan 2020, companies with annual turnover > 500 crores will begin using e-invoice. Thereafter, as per notifications of the Govt, companies with lower turnover will also begin to use e-invoice.
Schema	Is it possible to annotate a document type in the schema?	It has been provisioned as per the e-invoice schema.
IRP	Is there any contingency process for when IRP is not accessible / available?	Yes.
	If yes, where can specifications be found?	There will be more than 1 IRP to ensure continuity of business. All IRPs will use a common set of APIs to ensure compatibility and interoperability from businesses.
	If no, how should the supplier issue e-invoices during the time IRP is down?	As above.
Archiving	Will anything change from e-archiving perspective?	This service is not to be provided by IRP.
Exemption for industry	Banks and telecom companies do not use ERPs and they have multiple applications and also generate large number of invoices each month. They may be exempted from the trial for a month and may be brought from 1/2/2010.	From Jan 2020, it is to be rolled out as per the implementation plan of the Government. Exemptions, if any will be as per notifications by the Government.
IRN	IRN is to be generated using GSTIN of seller, Inv number and Date. CN/DN may have the same serial number as the Inv number as they are not generated using the same series. Thus there is need to incorporate Document type in generation of IRN.	The e-invoice schema is capturing the type of document which are addressing the issues raised.

IRN	The writing of hash (64 digit string) on Invoice is not desirable on account of the following	
	Mere writing will not indicate that it has been reported to IRP. The current proposal to allow generation of hash (as IRN) will not serve any purpose.	IRN is necessary to ensure the uniqueness of the invoice across ALL businesses in a particular FY across India. Hence, IRN will be included in the QR code. It is not needed to be generated by the business or printed on the invoice.
	In case it has to be validated, one will have to enter 64 digits to compare the same with generated hash.	This is going to be done by the systems. No human is required to manually calculate, generate, remember or write the IRN (hash).
	Thus, it is better to make digitally signed QR Code as response which will be proof of registration and can be used to read the main contents of Invoice.	QR code will include the IRN.
QR code	Will QR code be required to be printed?	QR code returned by the IRP will be printed by the business, if invoice is being printed.
API specs	In absence of API specifications, development work can't be done by S/W companies.	These are expected to be published shortly.
API specs	Will NIC provide new APIs for e-way bill?	E-way bill will continue to function as it is. No new APIs for e way bill will be published.
Business Query	Large taxpayers (who will be mandated to generate e-invoice and report to IRP) will be selling to smaller ones who will not be required to be on e-invoice. How will small guys get the invoice and ITC?	The large tax payers can convert the signed e-invoice from the IRP into an PDF and send these PDFs or printouts, or as they are conducting their business, to their small buyers.
Schema	Line items in an invoice be increased to 1000 from current limit of 250.	The line items can be 10000 per e-invoice.
Amendments	Can invoice uploaded on IRP be amended? If yes, how will amendment of Invoice data uploaded on IRP be done?	E-invoice reported to IRP will be pushed to the GST System. Any amendments to be made will be done on the GST system only and not on the IRP. However, if the business wants to cancel an already reported invoice, he may do so by uploading the IRN or by uploading the following: - GSTIN

		<ul style="list-style-type: none"> - Type of document - document number - document date <p>Once an invoice is cancelled, the same invoice number can not be used again to generate another invoice.</p>
Cancellation	How will one cancel the invoice uploaded on IRP?	As described above.
Applicability	Will there be any exempt sectors from the e-invoice mandate	Government will notify the exemptions, if required.
Schema	Is there any Place of Supply in the schema?	Yes, it is covered in the e-invoice schema.
Mapping of e-invoice to ANXs	Will the e-invoice be mapped to the ANX 1 / 2 by IRP or will the tax payer have to do that?	The IRP will push the data (payload) to the GST System. The GST system will convert the e-invoice received and populate it into the GST ANX 1 and GST ANX 2 of the seller and buyer respectively.
E-Way Bill	Will IRN be a part of the E Way bill?	It will depend upon the notifications by the Government.
	How does the user get the e way bill?	E way bill will continue to be generated as per the current method.
IRN	Is the IRN needed to be printed on the invoice?	The IRN is a mandatory part of the e-invoice and hence has to be a part of the invoice for all formal purposes.
E-Way Bill	Will the e-invoice schema have the transporter id so that e way bill can also be generated using this?	Transporter ID parameter will be created in the e-invoice schema. Part A of the e-way bill will be populated from the e-invoice schema data itself.
E-Commerce	Can e-commerce companies generate invoices for the sellers on their platform?	The matter has been taken up with the Government to allow E-commerce operators, (as approved by the Government from time to time), to generate the invoices on behalf of sellers, provided the sellers explicitly authorize them to do so.
IRP	Will json upload facility be available from Jan 2020?	Yes JSON upload will be enabled from Jan 2020.
ANX 1	What will happen if ANX 1 is updated after the invoice has been pushed into the IRP?	Both the versions will be kept and available in the GST system, as part of the e-invoice registration at the IRP and secondly in the GST system, when being amended.
Schema	When is the section on delivery_or_invoice_period mandatory?	In case of continuous supply of services.

	For “supplier legal name” which name is needed – as per PAN or as per GSTIN?	Legal name of PAN is taken as the input for registration of GSTIN.
	When does the “payee information” become mandatory?	This is optional.
	For “billing_name” the description of the schema says ‘buyer legal name’ but the explanatory notes says ‘trade name of buyer’. PI clarify which is to be used.	Buyer legal name is to be used
	For ‘payer_financial_account’ description says ‘account number of payee’. PI clarify if its for payer or payee.	The same can be changed to Seller
	For ‘modeofpayment’ would a supplier know whether the payment by buyer would be by cash or credit?	Seller may dictate and specify the mode of payment to the buyer.
	For ‘document total’ the section is mentioned as optional but the field is mentioned as mandatory. PI clarify.	The field becomes mandatory only if you choose to use and fill the section A1.3. Else it remains optional.
	For ‘Document Total -> Tax_Total’ there is a conflict with the cardinality. If the max cardinality is 1, how can there be 2 instances of this field? PI clarify.	This is only informative field
	PI explain the mechanism of handling TCS by e-commerce players. Where and how will this be reported?	Invoice is issued by supplier and IRN will also be obtained by the supplier whereas e-commerce operator facilitates such supply and is not required to obtain IRN. Therefore, TCS is not a part of the invoice of e-commerce operator.
Tax Collected at Source	Is the physical copy of invoice needed for movement of goods? The current law provision mandates this. How will it be treated with e-invoice?	Relevant changes will be notified by the Government.
E Way Bill	Is it possible to have > 1 QR code on the invoice?	Yes, the seller is free to use his business flow/process as he is currently doing, by using the e-invoice schema. The IRP’s QR code has to be in the e-invoice, as it validates the invoice. If seller wishes to place more than 1 QR code, then he needs to properly annotate them to clarify which is which.

QR Codes	What parameters will be validated by the IRP	The IRP will check for the GSTIN, invoice number, financial year and also for de-duplication of this unique combination in the GST system.
IRP	How will IRP validate for wrong GSTIN or cancelled GSTINs?	IRP will have the existing and valid GSTINs for validation. Wrong GSTINs, deleted GSTINs, cancelled GSTINs will be rejected by the IRP.
IRP	Taxpayers will be allowed to upload e-invoices created for B2C supplies also.	In long run, this may be allowed.
Business	Taxpayer may sign the e-invoice payload before sharing the same with buyer as well as IRP. This should be allowed.	This is allowed.
	E-commerce operators should be enabled to create Invoices on behalf of the vendors just like transporters are enabled to create e-way bill for their clients.	As described above.
E-commerce	In case of export, the tab of 'with/without payment' should be made mandatory.	It has been made mandatory in the e-invoice schema.
Business	Large business (> 100 crores) also has B2B and B2C door to door delivery. Will he also be required to print QR codes on the invoices?	Yes.