



# QUERY LOG: TAX & REGULATORY

BDO INDIA  
November 2025

Only for EPCES and its members

# Query Log : 1st November 2025 to 30th November 2025

S. No.	Querist Name	Category	Query from member	Response by BDO Team
1	Vishwanath G. Hublikar GM-Exim, H. K. Designs	SEZ	<p>am requesting you for clarity because as an gem and jewelry manufacturing units in SEEPZ - SEZ, we are not allowed to do trading.</p> <p>Also, the rule says “Inter Unit Transfer” and not “Inter Unit Sale” under the Rule 27, 34 Or 38. As per my understanding “Transfer” stand for giving goods to somebody else as it is. Since, Trading is not allowed, I need suggestion can we transfer our RM on same rate ( i.e. same rate in which we procured indigenously or imported ) to other SEZ units.</p>	<p>As per Rule 38, inter-unit transfer is explicitly permitted, even if trading is not mentioned as an authorized operation. Goods or services imported into Special Economic Zone may be transferred to a Unit or Developer within the same SEZ or in another SEZ, subject to the prior written permission of the Specified Officer and such conditions as may be imposed.</p> <p>Therefore, imported raw materials may be transferred to other SEZ units “as is” at the procurement cost. Such transfers are considered internal movement and will not be treated as trading.</p>

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2.	Bharat Kothavale L&T Technology Services Limited Manager - SEZ & STPI Compliances	SEZ	<p>We are writing to seek clarification regarding the import policy and procedural requirements applicable to procurement of goods from one SEZ unit to another SEZ unit, particularly for IT/ITES goods classified under HS Code 8471 (including laptops, desktops, servers, etc.).</p> <p>While we understand that SEZ to SEZ transfers are permitted under the SEZ Rules, we would like to confirm the following in light of recent DGFT notifications and import restrictions:</p> <ol style="list-style-type: none"> <li>1. Is procurement of goods under HS Code 8471 from one SEZ unit to another SEZ unit treated as an “import” under the Foreign Trade Policy, or is it governed solely by SEZ Rules?</li> <li>2. Are such SEZ to SEZ procurements exempt from the import licensing requirements imposed under DGFT Notification No. 23/2023 dated 03.08.2023?</li> <li>3. Are Quality Control Orders (QCOs) or other import-related restrictions applicable to such transactions?</li> </ol> <p>We are planning to procure material from Dell International Services India Private Limited, located at M-4, SIPCOT Hitech SEZ, Kancheepuram, Tamil Nadu. As both our unit and Dell’s office are located within SEZs, we intend to avail customs duty exemption under the SEZ scheme. However, due to the above regulatory concerns, our shipment is currently on hold.</p> <p>We kindly request your guidance and clarification on the above points to facilitate smooth processing of the transaction.</p> <p>Request to clarify that being a SEZ Unit , shall we need to take Import Restricted Goods License for new goods covered under Chapter 8471.</p>	<ul style="list-style-type: none"> <li>As per Section 2(o) of the SEZ Act, 2005, the term import includes the procurement of goods by one SEZ unit or Developer from another SEZ unit or Developer.</li> <li>As clarified under Policy Circular No. 06/2023-24 dated 19.10.2023, issued by the DGFT, the import restrictions for import of IT Hardware notified vide Notification No. 23/2023 do not apply to SEZ, EOU, EHTP, STPI, or BTP units, provided the goods are only for captive consumption of the importing units. As procurement of goods by one SEZ unit from another SEZ unit is treated as import, no restricted import authorisation would be required to be obtained by the recipient SEZ unit provided the goods will be used by the recipient SEZ unit for its captive use only. Further, captive use covers all kinds of goods including capital goods meant for use within the SEZ unit.</li> <li>As per Para 2.03A(iii) of Chapter 2 of FTP 2023, exemption from applicability of mandatory QCOs issued under the BIS Act, 2016 is only provided to SEZ units on import of inputs which are required for export production provided no DTA clearance of such inputs or goods manufactured made out of such inputs is done and an undertaking in this regard is submitted to the concerned Development Commissioner of the SEZ by the SEZ Unit at the time of importation.</li> </ul>



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3.	Rohit Singh	SEZ	<p>We are a SEZ unit and we intend to sell our capital goods (computer, motor vehicles etc) to a unit in DTA for a certain consideration. These goods have been put to use for more than 10 years.</p> <p>We understand that as per Rule 49 of the sez rules, duties and IGST shall be paid on the depreciated value of the capital goods. Since the goods have been put to use for more than 10 years the value becomes NIL and consequently, in our view no duty and IGST should be paid.</p> <p>However, we will collect a consideration from the dta unit for such sale, which would be higher than the depreciated value.</p> <p>In this regard, please suggest how to proceed. Should duties be paid on the transaction value?</p> <p>please also clarify if bill of entry is to be filed in such cases? And if yes, please specify the procedure to file for NIL duty.</p> <p>Also, specify if the response to any query will change if the capital goods were procured on payment of duty?</p>	<p>As per Rule 48 of the SEZ Rules, 2006, if goods are supplied back to the Domestic Tariff Area (DTA) as such (without being used or processed), and no export benefits were availed at the time of their procurement, such goods may be cleared to the DTA on the basis of an invoice only, without the requirement to file a Bill of Entry.</p> <p>In all other cases, including where capital goods are cleared after use, filing of a Bill of Entry is mandatory. Accordingly, in the present case, the DTA buyer (or the SEZ unit on behalf of the buyer) should file a Bill of Entry for home consumption. The Bill of Entry should indicate that the clearance is under Rule 49(1) of the SEZ Rules, 2006, with duty computed on the depreciated value.</p> <p>Since the capital goods have been in use for more than 10 years, their depreciated value is effectively NIL, and therefore no customs duty or IGST is payable. This position remains the same even if the goods were originally procured on payment of duty, as Rule 49(1) mandates computation of duty for capital goods based solely on the depreciated value at the time of DTA clearance.</p>

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4.	R. Ravichandran. Larsen & Toubro Limited	SEZ	<p>We seek your guidance on the applicability of Tax Deduction at Source (TDS) under CGST Act, 2017 in respect of scrap sales by our SEZ unit to Domestic Tariff Area (DTA) buyers.</p> <p>As per the proviso to Section 51(1) of the CGST Act:</p> <p>“No deduction shall be made if the location of the supplier and the place of supply is in a State or Union territory which is different from the State or Union territory of registration of the recipient.”</p> <p>Since SEZ transactions are treated as inter-State, and the place of supply is different from the recipient’s registration.</p> <p>We request EPCES to kindly confirm whether GST-TDS is applicable on scrap sales by SEZ units to DTA buyers.</p>	<p>As per Section 7(5)(b) of the IGST Act, 2017, any supply of goods or services by an SEZ unit to a DTA buyer is treated as an inter-State supply. Further, the proviso to Section 51(1) of the CGST Act, 2017 provides that no TDS shall be deducted if the location of the supplier and the place of supply are in a State or Union Territory different from that of the recipient’s registration.</p> <p>Accordingly, since SEZ to DTA transactions are inter-State supplies, the condition specified in the proviso to Section 51(1) stands satisfied, and TDS under GST is not applicable on such transactions. Hence, no TDS under GST is deductible on scrap sales made by SEZ units to DTA buyers.</p>



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5.	Dashrath Walkoli	EOU	<p>Dear sir, our company is operating two units – one as an Export Oriented Unit (EOU) functioning under Chapter 6 of the Foreign Trade Policy (FTP), 2023 read with Notification No. 52/2003-Customs, and another as a Domestic Tariff Area (DTA) unit. The EOU has executed a Bond amounting to ₹10 crore for the import of duty-free raw materials required for the manufacture of final products. Subsequently, certain quantities of duty-free imported raw materials were transferred from the EOU to the DTA unit through delivery challans, as they were required for production purposes at the DTA unit. While transferring the said materials, the applicable Customs duties (Basic Customs Duty and Social Welfare Surcharge) were duly reversed and paid through TR-6 challan. However, the Integrated GST (IGST) component exempted at the time of import was not reversed, as payment through TR-6 challan does not qualify as a valid document for availing Input Tax Credit (ITC) in terms of Rule 36 of the CGST Rules, 2017. In view of the above, your kind clarification is requested on the following points:</p> <ol style="list-style-type: none"> <li>Whether the IGST component, initially exempted at the time of import under Notification No. 52/2003-Customs, is required to be reversed when such duty-free goods are transferred from the EOU to its DTA unit; and</li> <li>If such reversal is required, what is the prescribed procedure for effecting the reversal and for subsequently claiming ITC on the same.</li> </ol>	<p>When duty-free goods imported under Notification No. 52/2003-Customs are transferred from an EOU to its DTA unit, such clearance is treated as import into India in terms of Para 6.14 of the Foreign Trade Policy (FTP), 2023, and accordingly, all applicable duties including IGST under Section 3(7) of the Customs Tariff Act, 1975 become payable. Hence, the IGST component exempted at import must also be reversed.</p> <p>The correct procedure is to file a Bill of Entry for home consumption under Section 68 of the Customs Act, 1962, showing payment of BCD, SWS, and IGST. The DTA unit may thereafter avail Input Tax Credit (ITC) of the IGST paid on the strength of the Bill of Entry, as prescribed under Rule 36(1)(d) of the CGST Rules, 2017.</p>
6.	Jaydev Kag Deputy Manager	SEZ	<p>We are having some scrap in our SEZ unit like MS Scrap, Aluminium Scrap and some Copper Scrap. We like to know that whether buyer is required State pollution Control board registration for buying scrap. If yes then under which rule and if no then under which exemption please help to clarify the same.</p>	<p>As per the Hazardous and Other Wastes (Management &amp; Transboundary Movement) (HWM) Rules, 2016 and the guidance issued by various State Pollution Control Boards (SPCBs), wastes listed under Part D of Schedule III includes MS scrap, aluminium scrap, and copper scrap.</p> <p>For traders or buyers of such scrap, a one-time authorisation from the concerned State Pollution Control Board is required. Actual users (who process the scrap within their own unit) must hold valid consents under the Air and Water Acts and the relevant authorisations under the HWM Rules, including import licence (where applicable), duly filed form 6, pre-shipment inspection certificate, chemical analysis report of the waste being imported and an acknowledged copy of the annual return filed with concerned State Pollution Control Board for import in the previous financial year. These documents ensure compliance with the HWM Rules for handling and importing metal scrap.</p> <p>Attaching herewith HWM Rules for your reference.</p>

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7.	Dashrath Walkoli	EOU	<p>Thank you for your kind clarification regarding the query on the applicability of IGST reversal and the procedure to be followed when duty-free goods imported under Notification No. 52/2003-Customs are transferred from our EOU to our DTA unit.</p> <p>We, however, wish to seek further clarification on the procedural aspect mentioned in your response – specifically, the filing of a Bill of Entry for home consumption under Section 68 of the Customs Act, 1962.</p> <p>In our understanding, the said procedure is not practically applicable in our case, as an EOU is not a bonded warehouse licensed under Section 58 or Section 65 of the Customs Act, 1962. An EOU operates under a special scheme governed by Chapter 6 of the Foreign Trade Policy (FTP), 2023, read with Notification No. 52/2003-Customs, and functions outside the main framework of Chapter IX (Sections 57-73) of the Customs Act relating to warehousing.</p> <p>Therefore, Section 68, which specifically governs clearance of warehoused goods for home consumption, may not directly apply to EOUs that are not operating as bonded warehouses.</p> <p>We shall be grateful if you could kindly clarify the appropriate procedural mechanism that may be followed by an EOU (not operating as a bonded warehouse) for:</p> <ol style="list-style-type: none"> <li>1. Payment of applicable duties including IGST at the time of transfer of duty-free goods to its DTA unit; and</li> <li>2. Enabling the DTA unit to avail Input Tax Credit (ITC) of the IGST so paid, in the absence of a Bill of Entry.</li> </ol>	<p>Rule 36(1) of the CGST Rules, 2017 prescribes valid documents for claiming of Input Tax Credit (ITC) by registered person. TR-6 challan (vide which IGST is paid at the time of transfer of goods from EOU to the DTA unit), is not specifically prescribed as a valid document for availing ITC.</p> <p>However, in terms of Rule 36(1)(d) of the CGST Rules 2017, ITC can be availed on the basis of ‘a bill of entry or any similar document prescribed under the Customs Act, 1962 or rules made thereunder for the assessment of integrated tax on imports’.</p> <p>Accordingly, the Company may avail ITC of IGST paid vide TR-6 challan considering the same as any similar document prescribed under the Customs Act, 1962 or rules made thereunder for the assessment of integrated tax on imports. However, the same may be subject to litigation.</p>



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8.	Prakash Kalburgi   Finance & Accounts	SEZ	<p>Case : Capital goods (laptops) debonded by filling SEZ BOE for removal under e-waste process and post BOE clearance have paid the applicable duties.</p> <p>Query: Unable to view ITC on “GST portal” in the “GST return of GSTR-2B”, the ITC against the GST paid on said BOE. And so the reason, as ITC not appear in GSTR-2B against said tax payment therefore unable to claim the ITC.</p> <p>Requirement:- Request you to guide how to claim the Input Tax Credit benefit on the tax paid against said SEZ BOE as paid tax amount not appearing in GSTR-2B ?</p>	<p>The GST portal provides the facility to retrieve/fetch Bill of Entry (BOE) data from the ICEGATE portal in cases where the data is not auto transmitted from ICEGATE portal to GST portal due to technical glitches. Please find the below steps to retrieve the data:</p> <p>Steps:</p> <ol style="list-style-type: none"> <li>1. Log in to the GST portal.</li> <li>2. Navigate to the ‘Services’ tab, then select ‘User Services’.</li> <li>3. Click on the ‘Search BOE’ option.</li> <li>4. Enter the required details such as Port Code, BOE number, BOE date and Reference date.</li> <li>5. Click on “search”.</li> <li>6. Click on “Query ICEGATE”.</li> </ol> <p>Upon successful completion of the above steps (provided the data is accurate), the details of BOE will be transmitted from the ICEGATE portal to GST portal.</p>



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9.	Vishal Godambe   Senior Analyst - Tax & Regulatory Services Ernst & Young LLP	EOU	<p>We, Varex Imaging Manufacturing India Private Limited, have been granted Letters of Permission (LOP) for two different EOU unit locations:</p> <p>1. Plot No. PAP-K-11/1, MIDC Phase II, Chakan Industrial Area, Khalumbre, Taluka Khed, District Pune - 410 501, Maharashtra. LOP No. SEEPZ-SEZ/EOU/Varex/07/2025-26/860 Dated 03 October 2025</p> <p>2. C2-154 &amp; C2-155, Andhra Pradesh Med Tech Zone, Survey No. 480/2, Nadupuru Village, Pedagandyada Mandal, Visakhapatnam - 530031, Andhra Pradesh. LOP No. PER/490 EOU/VSEZ/2024/5554 Dated 27 Nov 2024</p> <p>We kindly request your guidance on the following:</p> <ul style="list-style-type: none"> <li>• Should we apply one consolidated application for both EOU unit RCMC application?</li> <li>OR</li> <li>• Should we file separate RCMC applications for each unit?</li> </ul>	As per DGFT guidelines, RCMC is issued on an Export Promotion Council (EPC) basis, and only one RCMC is required per EPC for a given legal entity. There is no need to apply for separate RCMCs for multiple units or locations within the same EPC.
10.	Manimaran Krishnamoorthy	SEZ	I am writing to kindly request your assistance regarding the monthly query log that your esteemed office publishes. As we are eager to stay informed and keep track of the queries answered for SEZ units, could you please provide us with the link to download the complete query log? Your help in this matter would be greatly appreciated.	The monthly query logs, containing all the queries answered is circulated to all members through the designated WhatsApp group. Additionally, all publications relevant to the members can be accessed here: <a href="https://www.epces.in/epces-publications.php">https://www.epces.in/epces-publications.php</a>

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11.	RD CSEZ	DTA	<p>We request your kind guidance regarding the GST procedures applicable for supply of goods from a Domestic Tariff Area (DTA) unit to our Export Oriented Unit (EOU) located in Industrial Development Area, Edayar.</p> <p>As per the recent notifications and provisions governing EOUs, we would like to understand the following points clearly:</p> <ol style="list-style-type: none"> <li>Whether it is practically permissible for a DTA supplier to issue a without IGST invoice when supplying goods to an EOU unit, subject to submission of the required prescribed documents. If so, what are the prescribed documents?</li> <li>If IGST is charged by the DTA supplier, kindly clarify ; Whether the EOU is eligible to claim refund of IGST paid on inward supplies. The procedure and documentation required for filing such IGST refund claims and the relevant forms, timelines, and portal process for submitting the refund application</li> </ol>	<p>Notification No. 48/2017-Central Tax dated 18.10.2017 notifies supplies of goods by a registered person to EOUs / EHTP / STP / BTP units as deemed exports under Section 147 of the CGST Act, 2017. As per second proviso of Rule 89(1) of the CGST Rules, 2017 allows either the supplier or the recipient EOU to claim refund of the tax paid on these supplies.</p> <p>The EOU must issue Form-A (prior intimation), pre-approved by the Development Commissioner to the supplier and both jurisdictional GST officers. After receipt of goods, the EOU must endorse the supplier's invoice and share the endorsed copy with the same authorities. The EOU must also maintain digital records of such procurements in Form-B with audit trail.</p> <p>DTA supplier needs to issue an invoice charging IGST when supplying goods to an EOU unit whereby either the EOU or the supplying unit can claim refund of the IGST paid.</p>

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12.	Sumit Kumar Procurement	Export	We introduce ourselves as a Firearms manufacturer Based In Uttar Pradesh. We want to expand our business so we want to know about the facilities and Benefits currently available for us so that we can participate in growth of State and be independent in the Defence Sector.	<p>UP Aerospace &amp; Defence Policy, 2024 - The Aerospace and Defence Unit and Employment Promotion Policy 2024 is designed to boost the aerospace and defence manufacturing ecosystem. It aims to create a robust infrastructure within the Uttar Pradesh Defence Industrial Corridor (UPDIC).</p> <p>Policy Benefits:</p> <ul style="list-style-type: none"> <li>• Financial Incentives: Front-end subsidies for A&amp;D units, capital subsidies, land allotment at discounted rates, and stamp duty exemptions.</li> <li>• Operational Support: Exemptions on transportation charges and special provisions to encourage women entrepreneurs.</li> <li>• Startups and MSMEs: Common facility centres to enhance skills, capabilities, and innovation, supporting startups and MSMEs alongside large manufacturers.</li> </ul> <p>Investment and Employment Goals: The policy targets Rs 50,000 crore investments over five years and anticipates generating direct employment for around one lakh youth.</p> <p>Strategic Objectives: It seeks to attract large A&amp;D manufacturing projects and Defence Public Sector Undertakings (DPSUs), promote research and innovation, and position Uttar Pradesh as a key contributor to India's defence and aerospace sector.</p> <p>Attaching the policy documents herewith for your reference and detailed information.</p>



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13.	DUBEY Abhinay (CNH)	SEZ	<p>We are an IT/ITeS SEZ unit operating under our approved list of authorized operations, primarily involving IT-enabled services. As part of our upcoming business expansion, we intend to broaden our service portfolio to include the following areas:</p> <ol style="list-style-type: none"> <li>1. Financial Services</li> <li>2. Strategic Sourcing (Purchasing)</li> <li>3. Digital and Information Technology</li> <li>4. Transport Logistics Services</li> <li>5. Product Quality</li> <li>6. Finance and Accounting Services</li> </ol> <p>In this regard, we request your support and guidance on the following points:</p> <p>i) Broader process for inclusion of these services</p> <p>Please advise on the procedure for incorporating the above-mentioned activities into our existing Letter of Approval (LOA), including any documentation or prerequisites required by the Development Commissioner/SEZ authorities.</p>	<p>Broader process for inclusion of these services</p> <p>To include the proposed service lines in the existing LOA, an application in Form G must be submitted to the Development Commissioner, detailing the new activities, their alignment with authorized IT/ITeS operations, and the expected impact on exports, employment, and infrastructure. The submission is typically supported by an updated project report, board resolution, revised service descriptions, and process documents demonstrating that the activities qualify as ITeS. The DC may seek clarifications before issuing an amended LOA incorporating the additional operations.</p> <p>Impact on current business structure (including TP considerations)</p> <p>The addition of these service lines may require updates to intercompany agreements, functional profiles, and transfer pricing policies to ensure the expanded scope is accurately captured. Variations in the nature or complexity of services may influence the FAR analysis, margins, and benchmarking methodology. Arm's-length pricing for each service category must be maintained, and relevant compliance documents, including intercompany contracts and TP files, should be updated accordingly.</p> <p>Accounting requirements</p> <p>SEZ regulations generally do not mandate separate books of account or separate bank accounts for each newly approved activity, provided all SEZ-authorized operations remain clearly identifiable in the unit's financial records. Appropriate cost and revenue segregation should be maintained to support SEZ and tax audit requirements. A dedicated bank account is required only for the SEZ unit as a whole, not for individual service lines.</p>

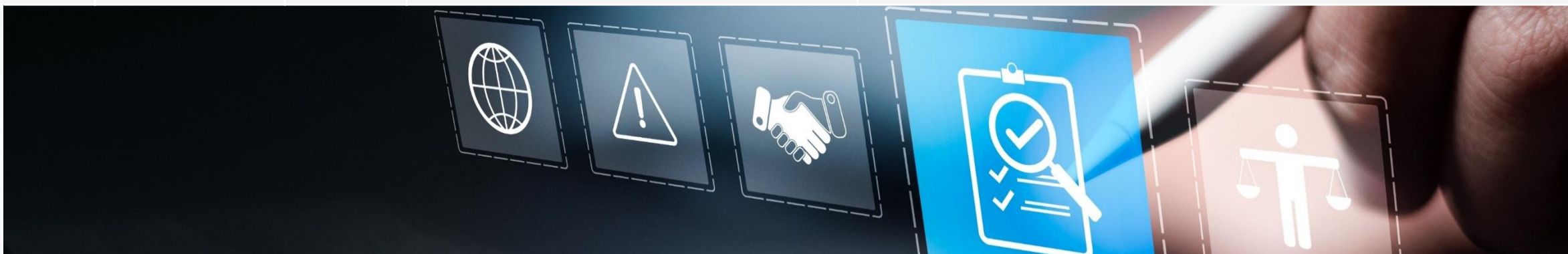
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13.			<p>ii) Impact on current business structure (including TP considerations) Request your review on how the proposed additions may impact our existing business model, particularly from a transfer pricing standpoint, intercompany contracting, and any related compliance implications.</p> <p>iii) Accounting requirements Please confirm whether the addition of these new services would necessitate:</p> <ul style="list-style-type: none"> <li>• maintaining separate books of accounts,</li> <li>• opening a separate bank account, or</li> <li>• keeping any additional statutory or operational records under SEZ regulations.</li> </ul> <p>We look forward to your guidance so that we may proceed with the required regulatory and internal steps accordingly.</p>	

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14.	Namdeo Shelke Manager - Materials	EOU	<p>We are 100% EOU unit located in Pune since 2002 and having positive NFE.</p> <p>Normally, we import duty free Moulds (Capital Goods) from Germany as FOC under IGCR. But, now Germany has developed one mould maker in Pune / Nasik, who will make the mould (on behalf of Germany) and supply the same to us in Pune. In such case, the payment of the mould will be done by Germany, directly to the supplier of the mould. We are not involved in this transaction. However, we will be receiving the mould on behalf of Germany and will do the production for export product. The property of the mould will remain with Germany.</p> <p>In such transaction, is mould maker allowed to deliver the Mould to us under Deemed Export benefit under Notification No. 48/2017 - Central Tax dated 18.10.2017? The supplier will NOT be charging the GST to Germany on the Invoice. Is he allowed to issue the invoice without GST, as the supply is at Pune. Is there any liability of GST to our German Counterpart under this notification at later stage?</p>	<p>Notification No. 48/2017-Central Tax dated 18.10.2017 notifies supplies of goods by a registered person to EOUs / EHTP / STP / BTP units as deemed exports under Section 147 of the CGST Act, 2017. As per second proviso of Rule 89(1) of the CGST Rules, 2017 allows either the supplier or the recipient EOU to claim refund of the tax paid on these supplies.</p> <p>The EOU must issue Form-A (prior intimation), pre-approved by the Development Commissioner to the supplier and both jurisdictional GST officers. After receipt of goods, the EOU must endorse the supplier's invoice and share the endorsed copy with the same authorities. The EOU must also maintain digital records of such procurements in Form-B with audit trail.</p> <p>Accordingly, the DTA supplier needs to issue an invoice charging IGST when supplying goods to an EOU unit whereby either the EOU or the supplying unit can claim refund of the IGST paid.</p>

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14.			<p>The supplier has given the following conditions to us (as an EOU) to avail the deemed export benefit by them :-</p> <ul style="list-style-type: none"> <li>• Recipient EOU must give prior intimation in Form A (we do not have format for this form A).</li> <li>• Supplier must deliver goods at EOU premises - The supplier will do this.</li> <li>• Recipient must not take ITC. We will NOT take the ITC as we are not making any payments of this mould to supplier.</li> <li>• Either supplier or recipient may claim refund - NO GST/IGST is charged and hence no question of refund.</li> </ul> <p>The supplier is asking to submit the following documents :-</p> <ol style="list-style-type: none"> <li>1. Prior intimation (Form A).</li> <li>2. Declaration that ITC has not been availed.</li> <li>3. Approval Letter from Development Commissioner.</li> </ol> <p>Our German counterpart need to make clarification of this transaction before releasing the PO on the supplier in Pune / Nasik. We therefore, request you to confirm, whether this transaction is allowed without charging IGST by the Pune/Nasik based supplier under Notification No. 48/2017 - Central Tax dated 18.10.2017</p>	



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15.	Rangaswamy KH (Customs)	EOU	<p>We, M/s. Hical Technologies Private Limited, operating as a 100% Export Oriented Unit (EOU), are engaged in the manufacturing and export of Electromechanical, Mechanical and Electronic products for Aerospace and Defence applications. Which includes components and assemblies.</p> <p>We have procuring duty free goods from Ex-bond Bill of Entry to EOUs for home consumption under the IGCR Bond, duty forgone amount will be debited in the IGCR Bond in ICEGATE online. Now 1st September 2025 CHAs insisting us to give the manual transfer bond (warehouse to warehouse) for Ex-bond Bill of Entry, attached bond format for reference, CHAs while Bill of Entry filing getting error code of 146. As per advisory filing of Ex-bond bill of entry from warehouse to EOUs the both IEC to be mapped in the ICEGATE via executing general bond in the system for movement of goods for inter sale activities.</p> <p>We request to kindly advise the it is applicable for EOUs.</p>	<p>As per the ICEGATE advisory effective 1 September 2025, Ex-bond BoE filings from a warehouse to an EOU require IEC mapping of both entities through execution of a General Bond in the system. In the absence of this mapping, the system throws Error Code 146, which is why CHAs are insisting on a manual warehouse-to-warehouse transfer bond. Once the General Bond is executed and IECs are mapped, the Ex-bond filing will proceed without needing manual documentation.</p> <p>Kinly note- ICEGATE advisory for Ex-bond BoE filing is fully applicable to EOU units, and EOUs must comply with IEC mapping and General Bond execution for warehouse-to-EOU movements.</p>



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16.	Praveen Purohit AGM-Finance and Account	SEZ	<p>I am writing to seek your expert opinion regarding the calculation of the depreciated value of a capital asset that we plan to sell to a Domestic Tariff Area (DTA) unit. Our unit is a garment manufacturer located in an SEZ, and our main products is jackets and formal trousers. Due to a lack of export orders over the last 6-8 months, we are planning to sell some of our capital assets (sewing machines) to a DTA unit.</p> <p>For the purpose of duty calculation, we initially took depreciation up to the date of filing the Bill of Entry. However, the Customs Officer has reassessed our Bill of Entry, stating that our unit is not eligible to claim depreciation for this 6-month period because the machinery was not in use and no products were exported during this time.</p> <p>My query is this: Can the department deny the depreciation for this "idle" period where we did not have any export orders? As per Rule 34, a unit can claim depreciation from the date the asset was first put to use for manufacturing up to the date of filing the Bill of Entry for DTA clearance.</p> <p>Could you please advise if the department's contention is legally correct in this specific scenario?</p>	<p>Under Rule 49(1)(a) of the SEZ Rules, 2006, a unit may remove capital goods to DTA after their use in a Special Economic Zone, upon payment of IGST on the depreciated value of such goods and at the rate in force on the date of removal of the goods. Further, Rule 49(1)(b) of the SEZ Rules 2006, provides that depreciation in value shall be allowed for the period from the date of commencement of production or where such capital goods have been received in the unit after such commencement of production from the date such goods have been put to use for production till the date of presentation of Bill of Entry for home consumption.</p> <p>Accordingly, in line with these provisions, depreciation should be calculated up to the date of filing the Bill of Entry, and not merely until the period the goods were in use.</p>

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