

"Driving Salamat To Jivan Salamat"

અખિલ  
ગુજરાત ટ્રક  
ટ્રાન્સપોર્ટ એસોસીએશન



Akhil  
Gujarat Truck  
Transport Association

૭૫, સહજાનંદ શોપીંગ સેન્ટર, સ્વામીનારાયણ મંદિર સામે,  
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Ref. No. : AGTTA/2019-2020/15-1

Dt.18-05-2019

Most Urgent

To,  
**Shri Dr. P. D. Vaghela**  
Commissioner SGST  
Ahmadabad, Gujarat

**Subject: Representations from Transport Industry for GST and Eway Bill.**

Respected Sir,

We refer to our various representations and discussions in your office at all the levels but still it needs your immediate attention and positive solution for below mentioned pending issues.

**GST Registration :-**

1. Number of times We have represented that registration for GST is based on PAN Card and there are many proprietors who are having more than one Trade Name to carry out different or same activity are not able to registered more than one Trade Name because of one PAN Card as Proprietor.
2. As discussed earlier most of the Transporters and Vehicle Operator's are not registered under GST as they are under Reverse Charge Mechanism not availing any credit input hence our commercial vehicles, Tube, Tyre and Flaps and some of the Spare parts should be taken to lower Rates. We further like to highlight that more than 75% of such commercial vehicles are owned by single operators/owners.

**EWAY BILL ISSUES**

1. Regarding Consignment lying in Transporter's Godown to have valid Eway Bill, But wherever consignee has not taken the delivery of such consignment for any genuine reason to keep the validity to Eway bill in order due to one day extension facility only, has put lot of administrative burden on such Transporters wherein have to extend every day for all such consignment till it is delivered to the party.
2. We like to bring to your attention that there is no provision in the present system for the transporter to cancel/ reject any Part A or Eway Bill assigned to his enrollment ID by mistake or for which material has not been received by him for further transportation.

Reason: The Part A or Eway Bill assigned to the transporter and material not booked or transported by him will stand in his account and the department may ask to prove that the transporter has not transported the material.

So a system for cancelling or reporting to the authorities, that transportation of material for this Part A or away bill assigned to his transport name or enrollment ID, has not been done by the transporter ,must be introduced in the present away bill system.

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3. There is a problem of expiry of away bill faced by the transporters who transport goods particularly small consignments up to distance of 100 kms as the time limit of 1 day is violated when there are Sundays or public holidays falling on the next day or in certain segments small operators who are operating when feasible number of consignments are accumulated for transport to the nearby station.

For these reasons first 100 km the validity of away should be increased to minimum of 2 days.

4. In many big cities various transporters are having many booking centers in various parts of the city and on daily basis or when ever required they assemble the consignments in main hub where as per present system from one booking centre thru another booking centre or directly to the hub they have to change the vehicle number in PART B at every stage which is not logical or practical looking to the common practices to provide the efficient logistic services which is today's need of the hour.
5. We understand that pincode of Consignor and pincode of Consignee is taken to calculate the distance and validity of Eway Bill. These distances are varying in many cases due to ring Roads mainly used by Commercial Vehicles due to restriction of movement of commercial Vehicles in city limits. As well having choice of to use different routes to approach the destination which is more than the 10% variation allowed, particularly in short distances it causes the concern.
6. After Various representations, the clerical mistake in PART B of valid away bill in regards to Vehicle number was relaxed wide Circular No. 64/38/2018-GST Dated 14-09-18 which is not implemented in goods spirit in genuine cases.

We are sure you will give patient look to above issues and will get us the positive solution for our Trade and Operator's.

Thanking you.

Yours faithfully,

**Mukeshbhai Dave**  
(Executive President)

**Nimishbhai Patel**  
(Chairman-GST Committee)

Copy to : **Shri Dr. Ajaykumar-Sp.Commissioner of Com.Tax, Ahmedabad**