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Recently, the Hon'ble High Court of Gujarat in the case of Filatex India Ltd. v. Union of India, [2025] 174 taxmann.com 79 (Gujarat) has held where assessee has filed refund application claiming accumulated ITC due to inverted duty structure, Authority cannot restrict "Net ITC" to ITC availed on inputs alone, thereby excluding input services for purposes of the formula under Rule 89(5). Benefit of amended Rule 89(5) as per Notification No.14/2022 dated 05.07.2022 is applicable to all refund claims filed before or after 05.07.2022 Facts of the case The Petitioner, inter alia, is in the business of manufacturing and supplying various categories of yarns. In the course of its manufacturing activity, the Petitioner procures various inputs and raw materials, including Purified Terephthalic Acid (PTA) and Mono Ethylene Glycol (MEG), both of which are essential for the production of textile yarns. The Petitioner has also availed v.....