

F.No.275/16/2019-IT(B)
Government of India
Ministry of Finance, Department of Revenue
Central Board of Direct Taxes

North Block, New Delhi 2nd September, 2019

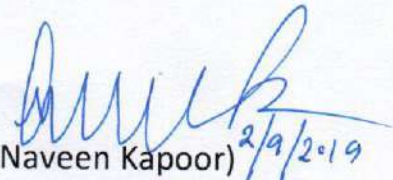
Office Memorandum

Subject: Modification in the new system of approval in respect of application under section 197 of Income Tax Act

Reference may be made to the Board's Instruction No. 7 of 2009 dated 23.12.2009 vide which prior administrative approval of Commissioner of Income-Tax was prescribed for issue of certificate under section 197 of the Income -Tax Act, where the tax forgone exceeded specified thresholds. Various administrative and systematic difficulties related to such amount of revenue forgone under the newly introduced system of online application u/s 195/197 of the I.T. Act 1961 in respect of non-resident taxpayers were brought to the notice of the Board. To address these difficulties, a proposal for raising the threshold of revenue forgone was made so as to balance the needs of supervisory control and expeditious grant of certificate.

2. The above matter has been examined in the Board and it has been decided to raise threshold of revenue effect for issue of certificates under section 197/195 needing approval of the Commissioner of Income Tax (Intl. Taxation) to Rs. 10 Crore. This threshold will be applicable for all stations in respect of all applications of non-resident taxpayers either pending as on date or filed hereafter.

This issues with the approval of the Chairman, CBDT.


(Naveen Kapoor) 2/9/2019

Under Secretary to the Govt. of India
Ph.No. 011-23094182

- 1.All Pr. CCsIT & Pr. DGsIT
- 2.Sr.PPS to Chairman all the Members of CBDT
- 3.Pr. DGIT(System), New Delhi
- 4.All Joint Secretaries and Commissioners of CBDT
- 5.CIT (CPC-TDS) for making necessary changes in TRACES processing rules.