



**PERCEPTIONAL ANALYSIS OF TAXPAYERS ON THE AVAILMENT AND
UTILISATION OF INPUT TAX CREDIT UNDER
GOODS AND SERVICE TAX**

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Abstract

The Goods and Services Tax (GST) regime changed the landscape of indirect taxation in India. The Input Tax Credit (ITC) mechanism serves as the backbone of GST. This paper provides a comprehensive analysis of the availment and utilisation processes of ITC under GST. The paper examines the legal framework of the ITC, the procedural aspects of its availment and utilisation, and the challenges associated with it. The study is based on an extensive review of scholarly papers and articles and an analysis of responses from 426 respondents. The study reveals that the overall experience of the respondents in the availment and utilisation of ITC is good. However, significant challenges in availment persist. These include reconciliation mismatches, blocked credit provisions, working capital constraints, and technological infrastructure gaps. It finally concluded with evidence-based recommendations for policy reforms, technological interventions, and procedural simplifications for seamless ITC mechanism to enhance GST efficiency.

Keywords: *Input tax credit (ITC), Cascading effect, VAT, MODVAT, availment and utilisation Input tax credit (ITC)*

1. Introduction

The country witnessed a watershed moment in its fiscal history on 1st July, 2017, when the Goods and Services Tax (GST) was implemented. The implementation of GST results in unifying a fragmented indirect tax system into a single national USD 2 trillion market with 1.3 billion consumers ^[1]. The Input Tax Credit is considered as the heart of the landmark reform, which serves as the backbone of the GST system by ensuring that tax is levied only on the value addition at each stage of the supply chain, thereby eliminating the cascading effect of taxes ^[2].



The ITC mechanism facilitates the registered taxpayers to avail credit of tax paid on inputs, input services, and capital goods which are used in the course or furtherance of the business. The registered person can utilise the ITC availed to offset output tax liability. This principle of seamless credit flow is fundamental in achieving the GST's objectives of simplifying tax administration, reducing tax burden on businesses, and promoting economic efficiency ^[3]. However, the implementation of ITC revealed significant challenges, such as compliance and operational difficulties that need systematic empirical investigation.

2. Literature Review

An extensive review of literature was conducted to understand the concept of availment and utilisation of the input tax credit under the GST law.

Gupta (2016)^[4] has taken a comprehensive review of the various provisions and sub-provisions to underline the basic structure of GST. **Mukherjee et al. (2019)**^[5] investigated that the GST aims to remove the cascading effect of taxes by harmonising the indirect tax structure. It was concluded that it could lead to better fiscal prudence for the country. **Samantara (2018)**^[6] conducted an industry-wise impact analysis of GST and found that removing the cascading effect may increase the overall GST tax base. **Rao et al. (2019)**^[7] studied GST from an administrative and compliance perspective, highlighted various issues and challenges, such as frequent changes in form, and suggested major changes to achieve a positive impact on the Indian economy. **Agarwal (2021)**^[8] investigated the flow of Input Tax Credits under GST and analysed the challenges being faced by taxpayers. The author concluded that there is a negative impact on the taxpayer due to the unavailability of ITC and blocked credits. **Shekhawat (2023)**^[9] conducted a study of ITC from both the taxpayer and revenue perspectives. The author suggested that the flow of ITC needs to be smoothed, and blocked credit and other provisions must be re-examined. **Kanrar (2019)**^[10] studied in detail the provisions of the Input Tax Credit using secondary data. The author concluded that ITC is necessary to eliminate the cascading effect of taxes. The author also highlighted that the smoother the flow of ITC, the higher the revenue generation. **Singhvi & Narwane (2020)**^[11] analysed the provisions of ITC with a special focus on the real estate sector. The author highlighted the impact of higher GST rates on the industry and the non-availability of ITC to stakeholders. **Manjhi (2021)**^[12] provided an overview of the provisions on blocked credit under the GST law and suggested that these provisions need revision. In its present form, it cannot stop revenue fraud but, at the same time, causes issues for genuine taxpayers.



3. Research Gap

The existing literature on the ITC focuses on the conceptual framework of the GST, its implications from economic and revenue perspectives, compliance-related aspects, etc. Input tax credit is the backbone of the GST. Several studies have examined the legal and procedural aspects of the ITC. However, there are limited studies covering the empirical aspects of the ITC examining the end-to-end process of ITC availment to utilisation. Further, limited attention is given to demographic dimensions and ITC mechanisms. In view of that, there exists a clear gap in conducting the empirical analysis about the perception of the taxpayer towards the availment and utilisation of the ITC under GST. The present study seeks to bridge this gap by providing evidence-based insights from the taxpayer's perspective and offering policy-oriented recommendations for strengthening the ITC framework.

4. Research Objectives: The Study pursues the following objectives:

1. To comprehend the legal and regulatory framework of availment and utilisation of ITC under GST.
2. To brief insight into the procedural aspects, technological and compliance ecosystem of the availment and utilisation of the ITC under GST.
3. To analyze and interpreted the perception of the taxpayers about the availment and utilisation of the ITC.
4. To evidence-based means and measures for boosting seamless ITC mechanism to enhance GST efficiency.

5. Significance of the Study

On the backdrop of 8 years of the implementation of GST, it is important to understand the ground reality of the ITC availment and utilisation process, as it involves interaction of multiple stakeholders and the ITC has the potential impact on the businesses, including challenges in ITC management that directly impact working capital, cash flow, and operational costs^[13]. Even for the tax administrator, the present study is important, as it will help in understanding and streamlining ITC by enhancing compliance, reducing disputes, and improving revenue collection. The study is also necessary for policymakers to identify the key challenges faced by taxpayers in the availment and utilisation of ITC, and to assess the achievement of the intended objectives of the GST^[3].

This study contributes to the existing literature by providing a comprehensive, integrated analysis of the ITC mechanism, synthesising legal frameworks, operational procedures, and empirical evidence to offer a holistic understanding of this critical component of India's GST regime.



6. Research Methodology

The present study is an empirical study based on the experiences of the taxpayer on availment and utilisation of the ITC. The primary data was collected using a structured questionnaire issued to 426 sample respondents selected by random sampling who are located in the Nashik District under the jurisdiction of the GST Commissionerate, Nashik. The data gathered from the respondents was analysed using Microsoft Excel 365 and IBM SPSS software in order to have results for descriptive and inferential statistics to test the hypotheses framed for the study.

7. Hypotheses of the study

In order to assess the perception of the taxpayer towards availment and utilisation of ITC, the following null and alternative hypotheses are being developed on the basis of the research problem identified through the literature review:

H₀ : There is no significant difference in the perception of the taxpayer towards the availment and utilisation of the ITC under GST.

H₁ : There is a difference in the perception of the taxpayer towards the availment and utilisation of the ITC under GST.

8. Background and Theoretical framework of the study:

India had a multilayer indirect tax structure, such as Central Excise, Service Tax, Value Added Tax (VAT), Sales Tax, etc., before the introduction of the GST, which resulted in tax cascading ^[13]. The primary objective of the GST law was to reduce the cascading effect ^[15]. The system of ITC was introduced in the Central Excise in the year 1986 by way of the introduction of the concept of MODVAT at the manufacturing level from 1st March 1986 ^[16]. The MODVAT was further streamlined in the Union Budget of 2000–2001. The new single rate scheme called CENVAT was introduced by Former Finance Minister Yashwant Sinha ^[17]. The concept of input tax credit existed under the pre-GST regime, particularly under the VAT and CENVAT systems. VAT was introduced in 2005, wherein the full input tax credit was generally available. The Cenvat credit system allowed manufacturers and service providers to claim credit for duties and taxes paid on inputs, input services and capital goods for payment of excise duty, service tax and State VAT for payment State VAT. However, utilisation of Central Tax with State Tax was not allowed.

8.1 Conceptual Framework of ITC under GST

The GST law was introduced to ensure a seamless flow of ITC across the entire supply chain, from manufacturer to retailer. The fundamental principle behind the allowance of the ITC is only to the extent of value addition and not on the entire value of their inputs ^[18]. This principle serves multiple objectives:

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- **Elimination of Cascading Effect:** By allowing credit for taxes paid at previous stages, GST prevents tax-on-tax, reducing the overall tax burden ^[19]
 - **Neutrality:** ITC ensures that the tax system does not distort business decisions regarding production methods, input sourcing, or organisational structure
 - **Efficiency:** Seamless credit flow reduces compliance costs and administrative burden
 - **Transparency:** The electronic credit ledger system provides real-time visibility of credit availability and utilization ^[20]

8.2 Constitutional and Legislative Provisions

The GST is established through constitutional amendments and comprehensive legislation. The Constitution (One Hundred and First Amendment) Act, 2016^[15], provided the constitutional basis for GST implementation, enabling both the Centre and States to levy GST on the supply of goods and services or both simultaneously. The legislative framework comprises the CGST Act, SGST Acts, IGST Act, and Union Territory GST Act, along with associated rules and notifications ^[3].

Section 16 of the CGST Act, 2017, provides for the eligibility conditions, time limits, and documentation requirements for claiming ITC. Section 16(1) of the CGST Act states that a registered person is entitled to take credit of input tax charged on any supply of goods or services used or intended to be used in the course or furtherance of business, subject to prescribed conditions.

8.2.1. Conditions for availment of ITC: The credit under the GST law is conditional ^[21]. The conditions must be satisfied by a taxpayer in order to claim the ITC to claim ITC. The following conditions are laid down to avail the ITC under GST-

- **Possession of Tax paying document:** The taxpayer must possess a valid tax invoice or debit note issued by a registered supplier or documents as prescribed under Rule 36 of the CGST Rules.
- **Reporting and communication of ITC:** The details of document of such tax paid are furnished in GSTR-1 by the supplier and communicated to the recipient in GSTR-2B.
- **Receipt of Goods or Services:** The goods or services must have been received by the taxpayer.
- **Not restricted under Section 38:** The details of ITC related to the supply have not been restricted and have been communicated to the registered person. Sec 38.
- **Tax Payment by Supplier:** The tax charged must have been actually paid to the government by the supplier through ITC or in cash.
- **Return Filing:** The taxpayer must have furnished the return under Section 39 of the CGST Act



The law also prescribes the additional conditions of payment on inward supplies within 180 days from the date of the invoice. If payment is not made within this period, the ITC claimed must be reversed along with interest. Further, the law also restricts to avail the ITC and depreciation on the ITC components simultaneously.

8.2.2. Time Limits for Claiming ITC: The GST law prescribes the time limits within which ITC must be claimed by the registered person. ITC must be claimed by the due date of filing the return for September, following the end of the financial year to which the invoice pertains, or the date of filing the annual return, whichever is earlier. The time limit of September was further amended to 30th November of the next year. These time limits create compliance pressure on businesses to maintain accurate records, reconcile invoices promptly, and file returns within prescribed deadlines to avoid losing eligible credit ^[13].

8.2.3. Restrictions and Blocked Credit: Even if the GST law was introduced with the intention of removing the cascading effect of taxes. However, the credit is restricted or blocked ^[23] in certain cases for certain supplies.

8.2.3-1: Restrictions on availment of ITC: The law allows the taxpayer to avail the proportionate ITC to the extent used for the business, where the supply is used for both business and non-business use or to the extent of provision of taxable supply, where the supply is used in both exempt and taxable supplies.

8.2.3-2: Blocked credit: Credit on the following supplies is restricted

- Passenger motor vehicle having an approved seating capacity up to 13 persons, including the driver. However, credit is available when used for further supply of such a motor vehicle or for carrying passengers or teaching the driving of such a motor vehicle.
- Vessels and aircraft. However, credit is eligible when used for further supply of such vessels or aircraft, or carrying of passengers, or providing training on navigating such vessels or flying such aircraft or for shipping of goods.
- General insurance services, servicing, repairs and maintenance related to motor vehicles, vessels and aircraft, subject to allowance in certain circumstances.
- Food and beverages, outdoor catering, beauty treatment, health services, cosmetic and plastic surgery, leasing, renting or hiring of motor vehicles, vessels or aircraft, life insurance and health insurance.

However, credit is available when they are used for providing similar services membership of a club, health and fitness centre and travel benefits extended to employees on vacation. Credit can be claimed if an employer is legally required to provide such supplies to its employees.



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- Works contract services when supplied for construction of an immovable property subject to allowance in certain circumstances.
 - Goods or services or both received by a taxable person for construction of an immovable property.
 - Tax paid on supplies under the composition scheme.
 - Supplies received by a NRI taxable person except on goods imported by him.
 - CSR expenses under section 135 of the Companies Act, 2013.
 - Supplies used for personal consumption.
 - Goods lost, stolen, destroyed, w/f /disposed of by way of gift or free samples;
 - Any tax paid under sections 74(frauds) 129 and 130.

8.2.4 ITC Availment and Utilisation Process: The ITC availment and utilisation process involves multiple steps. The process is essential in order to manage the input tax credit effectively and ensure compliance with regulatory requirements. The ITC can be availed only through FORM GSTR-3B. However, it involves multiple validations that are conceptualized as a sequential workflow:

1. Business purchases goods or services from a registered supplier
2. The supplies are received by the recipient on a tax invoice
3. The recipient records the invoice in their books of accounts
4. Supplier reports the outward supply in their GSTR-1 and communicates to the recipient in FORM GSTR-2B.
5. The recipient reconciles their purchase records with GSTR-2B, and if the records match the GSTR-2B details. The recipient claims ITC in Table 4A of FORM GSTR-3B. After filing the return, the credit shall be credited to the electronic credit ledger.

8.2.5 Electronic Credit Ledger: The GST regime introduced an electronic credit ledger system ^[24] that maintains a real-time record of ITC available to each registered taxpayer ^[20]. This allows electronic maintenance of the ITC availment and utilisation, which represents a significant advancement over the manual credit system that existed in the pre-GST regime. The ledger maintains separate balances for each tax head, i.e., CGST, SGST, UTGST, and IGST. This allows taxpayers to monitor the ITC balance on a real-time basis.

8.2.6 Manner of Utilisation: The ITC available in the Electronic Credit Ledger may be used for the payment of output tax liability. GST law prescribes the manner of utilisation of the ITC ^[2]. The ITC shall be utilised in the following manner:

8.2.6-1 IGST Credit: IGST credit shall be utilised first for payment of IGST liability, then for CGST liability or SGST/UTGST liability in any order.



8.2.6-2 CGST Credit: CGST credit shall be utilised for payment of CGST liability and then for payment of IGST liability. However, the IGST balance needs to be zero before utilisation of the CGST credit.

8.2.6-3 SGST/UTGST Credit: SGST/UTGST credit shall be utilised only against SGST/UTGST liability and then for payment of IGST liability. However, SGST can be utilised for IGST payment only when the CGST balance is zero. Cross-utilisation between CGST and SGST/UTGST is not allowed.

8.2.7. Practical Challenges in Availment: Despite the strong theoretical framework of ITC with the technological backbone of GSTN, the businesses often face several challenges in the utilisation process ^{[13], [22]}:

8.2.7-1. Extensive Documentation: Technology is the backbone of the GST. However, the ITC is available only when the taxpayer has the right tax document.

8.2.7-2. Stringent provisions for availment of ITC: The GST law was supposed to simplify the provisions of the availment of ITC. However, the stringent conditions are incorporated in the law to avail the ITC.

8.2.7-3. Supplier Compliance Dependency: The ITC is available to the recipient only when the invoice is reported by the supplier in GSTR-1, and tax is paid to the Government. This creates the burden on the recipient for the compliance of the buyer.

8.2.7-4. Complex Reconciliation: ITC is available to the recipient, subject to the matching of purchase records with GSTR-2B. The matching of data requires significant time and resources.

8.3.5-5. Technological glitch: Technical glitches often restrict the taxpayer from the availment of ITC in the stipulated time period.

8.2.7-6. Divergent judicial pronouncement: The judiciary has given divergent decisions that create uncertainty in ITC.

8.2.7-7 Time Pressure: The time limit for claiming ITC creates pressure to complete reconciliation and filing within deadlines

These challenges are particularly acute for MSMEs, which often lack the resources and expertise to manage complex compliance requirements ^{[2], [22]}.

9. Analysis and Interpretation of Data

The study examines the perception of the taxpayer (dependent variable) towards the availment and utilisation process of the ITC (independent variable) under GST by administering a well-structured questionnaire with a 5-point Likert scale from excellent to very poor. The data collected through the questionnaire were analysed and interpreted as follows:

Table 1: Descriptive statistics of demographic information

Descriptive Statistics



	N	Minimum	Maximum	Mean	Std. Deviation
Age	426	1.00	5.00	3.3920	.833
Gender	426	1.00	2.00	1.1408	.348
Education	426	1.00	4.00	2.7207	.728
Experience	426	1.00	4.00	2.8286	.815
Constitution of business	426	1.00	10.00	2.3333	1.646
Category of business	426	1.00	5.00	1.9695	1.058
Valid N (listwise)	426				

(Source: Survey data)

The table above shows descriptive statistics for the respondents. The mean gender score is 1.14, indicating that the majority of respondents are male, with a small proportion of females. The respondents have moderate education levels (around category 3), indicating a postgraduate level. The average experience is close to category 3, indicating that most respondents have 10-20 years of experience, suggesting a mature understanding of the subject. Most businesses fall into the partnership category. The wide range and higher deviation show diversity in business structures. Most businesses fall under the trader category. The following hypothesis was tested to understand the difference in perception of the taxpayer using Pearson's Chi-Square Test at 5% level of significance.

H₀: There is no significant difference in the perception of the taxpayer towards the availment and utilisation of the ITC under GST.

H₁: There is a difference in the perception of the taxpayer towards the availment and utilisation of the ITC under GST.

Table 2: Results of Chi-Square Test

Chi-Square Tests			
	Value	df.	Asy. Sig. (2-tails)
Pearson Chi-Square	32.604 ^a	12	.001
Likelihood Ratio	34.626	12	<.001
Linear-by-Linear Association	12.378	1	<.001
N of Valid Cases	426		
a. 9 cells (45.0%) have expected count less than 5 and the minimum expected count is .01.			



Table 2 above shows the test results of a chi-square test on the perception of the taxpayer towards the availment and utilisation of the ITC under GST. The p-value is 0.001, which is less than the acceptable level of 0.05. Hence, it rejects the null hypothesis and accepts the alternative hypothesis. Therefore, there is a difference in the perception of the taxpayer towards the availment and utilisation of the ITC under GST and the underlying factors such as age, education, experience and category of the business.

10. Findings and suggestions: By the entire presentation and analysis of data, the present study reports the findings and suggestions as under:

10.1. Findings: Based on the conceptual framework of ITC, a review of relevant literature and the testing of responses of the respondents, the following outcomes were drawn:

1. It is revealed that demographic factors such as experience, age, and education have a significant influence on the availment and utilisation of ITC. This also draws attention towards the awareness of the ITC provisions.
2. It is discovered that the taxpayer still faces challenges in availing the ITC in FORM GSTR-3B due to factors such as restrictive conditions, an increase in restrictions in the availment of ITC, dependency on the supplier for compliance.
3. It is found that the restrictions in utilisation of ITC, such as the order of utilisation or restriction on utilisation, such as Rule 88B, adversely affect the working capital management and accumulation of ITC in various heads.
4. GST is a techno-based tax and compliance made through the GST common portal. However it encountered many glitches which affecting the availment and utilisation of ITC.
5. Blocking of ITC on business-related expenses is another grey area that is underscored by the respondents during the personal conversation.

10.2. Suggestions:

On the basis of analysis and interpretation and findings drawn, the following suggestions put forth before the lawmakers, Governments and the GST Council for improvements and amendments-

1. There is a need for simplification of the legislative framework of ITC. The excessive and unreasonable conditions and procedures must be done away with to achieve the primary objective of seamless credit under the GST law.
2. The mechanism should be introduced to safeguard the recipient due to non-compliance by the supplier, specifically, where the recipient fulfils all the statutory obligations.



3. The ITC utilisation should be rationalised in order to avoid credit accumulation and working capital issues.
4. Technological infrastructure must be further strengthened by minimising technical glitches on the GST common portal, and utilities for reconciliation of ITC must be made available on the common portal.
5. In light of the evolving position of the law, more awareness programmes must be arranged to enhance the understanding of the taxpayer about the GST.
6. The balanced approach must be adopted by the administration in order to focus on compliance with the provisions of the GST law rather than punitive action.

11. Conclusion:

Based on the responses of the 426 respondents, the study concludes that there exists a difference between the perception of the taxpayers towards the availment and utilisation of the ITC as evidenced by the acceptance of the alternative hypothesis. The findings indicate that targeted reforms are required to align the present ITC mechanism with the economic substance. Simplification and rationalisation of provisions of ITC availment, reduction in the dependency of the supplier, and enhancement of the GST system are needed to achieve the desired objective of seamless ITC. Overall, the study found that the gap between the legislative intent of a seamless credit and the practical implementation of ITC availment and utilisation.

12. Limitations of the study:

The study restricted with following major limitations:

1. It is based on primary data collected from 426 respondents located in Nashik District, which may not be fully representative of all categories of taxpayers across India.
2. It is about the perception of the taxpayer, which may be influenced by several factors such as personal experience, interpretation of law, etc.
3. It focuses on the perceptual analysis of availment and utilisation of ITC and does not verify the factual compliance of the respondents' ITC practices.
4. The hypothesis testing examines the association between variables and does not measure the strength or direction of such relationships.
5. The perceptions may be changed due to subsequent amendments in the GST law.
6. It excludes external factors such as industry-specific challenges in availment and utilisation of ITC, administrative practices in each state, and the impact due to professional assistance, which may also influence taxpayer perception.

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