

From: **Asif Siddiq Kasbati** <asif.s.kasbati@professional-excellence.com>

Date: Mon, Dec 22, 2025 at 6:34 PM

Subject: TLQC3401= FBR delayed its Obligations TY-2026

## 590+ Taxes & Levies Quick Commentary – TLQC 3401

### I. Background (BG)

1. We refer to the related Important TLQC **in trail, blue, italic and double Line (a) 3376 of 5.12.25 about IT Return Form for TY 2026 sought by LTBA** (b) 1224 of 9.11.20 about Stepwise Deadlines for Timely notifying IT Return Forms – SRO 1185

2. We also refer to several Other TLQC including (a) 3386 of 10.12.25 about ITR TY 2025 Return Filing Fake SMS & PTA to investigate (b) 3341 of 12.11.25 about No more Manual return considering SRO 2107 and KC Views (c) 3244 of 24.8.25 about **Delayed** 8 Types / Categories TY 2025 IT Return Forms – SRO 1562 (d) 3243 of 24.8.25 about So-called Simplified & **Delayed** Salaried class (with no business) TY 2025 Form - SRO 1561

### II. Updated Commentary

#### A. General

Further to KQU 3713 of 22.12.25, **being an Important matter**, we would inform you about [PTBA regarding Latter of 20.12.25 Statutory requirements regarding publication notification of form of Income Tax Return for Tax Year-2026 under the Income Tax Ordinance 2001](#) (**Attachment 3401.1**) in the ensuing paragraph, with emphasis in **bold & Underline** and Heading ours for quick reading.

#### B. Delay by FBR

1. Before proceeding to the substantive issues referred to above, it is necessary, in the interest of justice, to place on record the succinct facts of the issue, **particularly the inaction on the part of the Board in discharging its statutory obligation regarding the issuance of the prescribed return forms related to the Tax Year-2026.** These forms are required to be issued for persons obligated to file returns of total income for the relevant tax year u/s 114 of the ITO, 2001

2. **Due to such inaction and/or delayed action on the part of the Board, the situation has not only aggravated but has also become embarrassing for all stakeholders, including tax collectors, taxpayers, and tax practitioners. On the one hand, taxpayers and the tax fraternity are compelled to seek extensions of the due date for filing returns, while on the other hand, tax collectors adopt a rigid stance by initially refusing to grant such extensions. Ultimately, extensions are granted at the eleventh hour, often in a humiliating manner.**

3. Had the Board fulfilled its statutory obligations in a timely manner, there would have been no occasion for taxpayers to apply for extensions of the due date for filing returns.

#### C. Substantive issues

##### 1. Section 114

1.1 Now being representative body of the tax bars operating in whole of the country, PTBA bring on record the statutory provisions, depicting intent of the legislation and rules made thereunder pertaining to scheme of law i.e. u/s 114 of the ITO 2001 and Rules 34 and 34A of the ITR 2002, in the manners as per followings:-

*Return of income.- (1) Subject to this Ordinance, the following persons are required to furnish a return of income for a tax year, namely:-*

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*(2) A return of income -*

*(a) shall be in the prescribed form and shall be accompanied by such annexures, statements or documents as may be prescribed 29[:]*

*[Provided that the Board may prescribe different returns for different classes of income or persons including persons subject to final taxation;]*

*(b) shall fully state all the relevant particulars or information as specified in the form of return, including a declaration of the records kept by the taxpayer;*

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*(e) shall be accompanied with a wealth statement as required under section 116 and*

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1.2 The procedure to furnish return of total income and other documents has been catered in Section 118 of the Income Tax Ordinance 2001, has been provided.

1.3 In cases where the statutory provisions relating to the transmission of returns of total income are not complied with, the Income Tax Ordinance, 2001 has duly addressed such situations under Section 119 thereof.

1.4 This provision assumes extraordinary significance where there is delay or inaction on the part of the Board in discharging its statutory obligation to issue the prescribed form of return of total income.

1.5 For would appreciate that the obligations under the aforementioned provisions of law are interdependent between the tax collector and the taxpayer. The Board is required to discharge its obligation by issuing/uploading the prescribed form of return in a timely manner, while the taxpayer is obligated to transmit the return within the prescribed timeline as provided in the Ordinance.

## **2. Rule 34A (TLQC 1224 of 9.11.20 in trail refers)**

2.1 In this context, it would not be out of place to draw your kind attention to Rule 34A of the Income Tax Rules, 2002, inserted through Notification No. SRO 1185(I)/2020 dated 06.11.2020, which prescribe specific timelines for the various steps involved in notifying the prescribed form of return of total income

2.2 As per Rule 34A of the Income Tax Rules, 2002, it is provided that the return form specified in sub-rule (2) of Rule 34 shall be notified for suggestions from all stakeholders likely to be affected thereby, on or before the 1st day of December of the financial year to which the return relates, by observing the following timelines:

*"(a) Inland Revenue Policy Wing shall identify the legal amendments to be incorporated in income tax return forms by thirty-first day of August of the financial year to which the return relates;*

*(b) preparation of change request form (CRF) shall be finalized by Inland Revenue Policy Wing and Information Technology Wing, in consultation with PRAL, by fifteenth day of September of the financial year to which the return relates;*

*(c) analysis and scrutiny of change request form (CRF) by Chief Income Tax Policy and Chief Business Domain Team shall be conducted by sixteenth day of September of the financial year to which the return relates and the same shall be submitted to Member Inland Revenue Policy for approval on the same day;*

*(d) PRAL shall complete configuration and development of the approved CRF by thirty first day of October of financial year to which the return relates; and*

*(e) User Acceptance Test (UAT) of the amended return forms on testing environment shall be finalized by Inland Revenue Policy Wing and Information Technology Wing, in consultation with PRAL, by fifteenth day of November of financial year to which the return relates and the same shall be submitted to Member Inland Revenue Policy for approval on the same day.*

*(3) The Return Form shall remain available on the portal for suggestions till seventh day of January of financial year to which the return relates.*

*(4) The final return form shall be notified on or before the thirty first day of January of financial year to which the return relates by observing following timelines:-*

*(a) Inland Revenue Policy Wing and Information Technology Wing shall review the suggestions received from stakeholders by twelfth day of January of financial year to which the return relates;*

*(b) a new Change Request Form (CRF), if required, shall be finalized by Inland Revenue Policy Wing and Information Technology Wing, in consultation with PRAL, by 15th day of January of the financial year to which the return relates and the same shall be approved by Member Inland Revenue;*

*(c) PRAL shall complete configuration and development of the approved CRF by 20th day of January of the financial year to which the return relates;*

*(d) User Acceptance Test (UAT) of the final Returnforms on testing environment shall be finalized by Inland Revenue Policy Wing and Information Technology Wing, in consultation with PRAL, by 25th day of January of the financial year to 751 Ch.-VIII, Returns Rule 36(2) which the return relates and the same shall be submitted to Member Inland Revenue Policy for approval;*

*(e) final income tax return forms shall be available on IRIS by the thirty first day of January of financial year to which the return relates;*

*(f) in case, any further amendments are made in the financial year to which the return relates that have an impact on the finally notified income tax return forms referred to at clause (e), such amendments shall also be incorporated accordingly; and*

*(g) notwithstanding anything contained in this rule, the time so specified may, if requested by the Member Inland Revenue Policy, be extended by the Board to such extent and subject to such conditions and limitations as it may deem proper."*

2.3 In light of the submissions supra, your good self is requested to kindly look into the matter personally and issue appropriate directions to the relevant authorities to ensure the fulfillment of their legal obligations as mandated under the law, so as to avoid any untoward situation that has been recurring for many decades, particularly at the time of filing of returns.

### **III. Further Details & Services**

Should you require any clarification or explanations in respect of the above or otherwise, or require Income Tax, Federal & Provincial Sales Tax or Withholding Tax Statement, Advisory, Return Filing or Review services, please feel free to email Mr Amsal at [amsal@kasbati.co](mailto:amsal@kasbati.co) with CC to [info.kasbati@professional-excellence.com](mailto:info.kasbati@professional-excellence.com), [asif.s.kasbati@professional-excellence.com](mailto:asif.s.kasbati@professional-excellence.com).

Best regards for Here & Hereafter  
Asif S Kasbati (FCA, FCMA & LLB)

**Managing Partner**

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From: **Asif Siddiq Kasbati** <[asif.s.kasbati@professional-excellence.com](mailto:asif.s.kasbati@professional-excellence.com)>  
Date: Fri, Dec 5, 2025 at 6:18 PM  
Subject: TLQC3376= IT Return Form for TY 2026 sought small — LTBA  
To: Amsal Mob 1111 (KC Director) <[amsal@kasbati.co](mailto:amsal@kasbati.co)>

## **A. Background (BG)**

1. We refer to the related Important TLQC **in trail, blue, italic and double Line** (a) 3341 of 12.11.25 about No more Manual return considering SRO 2107 and KC Views (b) 1224 of 9.11.25 about Stepwise Deadlines for Timely notifying IT Return Forms - SRO 1185
2. We also refer to several Other TLQC including (a) 3244 of 24.8.25 about **Delayed** 8 Types / Categories TY 2025 IT Return Forms – SRO 1562 (b) 3243 of 24.8.25 about So-called Simplified & **Delayed** Salaried class (with no business) TY 2025 Form - SRO 1561

## **B. Updated Commentary**

1. Further to KQU 3680 of 2.12.25, **being an important matter**, we would inform you as to Publication/notification of Income Tax Return form for Tax Year 2026 under rule 34A of the Income Tax Rules, 2002 dated 1.12.25 - LTBA (Attachment 3376.1).
2. On behalf of the members of the Lahore Tax Bar Association, we respectfully draw your attention to the statutory requirement under Rule 34A of the Income Tax Rules, 2002, which mandates that the prescribed Income Tax Return Form for each tax year be published on or before the first day of December of the relevant financial year.
3. In this regard, we earnestly request the Federal Board of Revenue to fulfill this legal obligation and issue the Income Tax Return Form for Tax Year 2026 without further delay. The timely publication of return forms is vital for ensuring smooth and orderly tax compliance, and for upholding taxpayers' confidence in the regulatory framework and administrative processes of the FBR.
4. The Lahore Tax Bar Association remains available to extend any assistance or participate in any consultative process that may facilitate the timely issuance of the return form.

## **C. Rule 34A**

For ready reference Rule 34A matters are covered with explanation / examples in TLQC 1224 of 9.11.25 in trial.

## **D. Return Forms Final Deadlines missed by FBR & PRAL for TY 2025**

1. Considering Rule 34A(2)(e), (3) & (4) - TLQC 1224 in trail refers - the **FBR was supposed to issue the Final return Forms SRO by 1.1.25 but late by over 6 months, as evident from below:**
2. Delayed 8 types of categories of Electronic (TLQC 3244 of 24.8.25 refers) which were issued vide SRO 1562 dated 18.8.25.
3. As evident from TLQC 3243 of 24.8.25, So-Called Simplified Electronic IT Return Forms for Salaried Individual, etc (not having business income) was issued vide SRO 1561 of 18.8.25.
4. No manual tax return forms / paper return form: FBR faces criticism for its persistent failure (Attachment 3307.3) but then changed the Rule, as to its non-applicability (TLQC3341 of 12.11.25 in trail refers).

## **E. Further Details & Services**

Should you require any clarification or explanations in respect of the above or otherwise, or require Income Tax, Federal & Provincial Sales Tax or Withholding Tax Statement, Advisory, Return Filing or Review services, please feel free to email Mr

Best regards for Here & Hereafter  
Asif S Kasbati (FCA, FCMA & LLB)

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From: **Asif S Kasbati** <[asifskasbati@tax-excellence.com](mailto:asifskasbati@tax-excellence.com)>

Date: Mon, Nov 9, 2020 at 6:11 PM

Subject: TLQC1224 - Stepwise Deadlines for Timely notifying IT Return Forms - SRO 1185

### Background:

This refers to our TLQC 1207 dated 24.10.20 (in trail, in blue, in italic and after double line) whereby we were informed about **Draft** for Stepwise Deadlines for Timely notifying IT Return Forms vide SRO 1041 dated 13.10.2020.

### Updated Status:

We also refer to our KQU # 722 dated 6.10.2020 (evening) whereby we shared the link of “Rules in respect of prescribing time limit for notifying Income Tax Return forms - SRO 1185 dated 6.11.20” alongwith several other important updates and now give our Commentary thereon in ensuing paragraphs.

2. The FBR has issued time limits for notifying the Income Tax Return Form vide SRO 1185 dated 6.11.20 (**Attachment 1224.1**) **finally adding a New Rule 34A** in Income Tax Rules, 2002 for setting timelines in respect of various steps involved in notifying income tax return forms for a tax year on a timely basis by 31 January (example added by KC for TY 2021 considering Finance Act 2020 by 31 January 2021 - assuming that FBR has already started work).

3. The changes between Draft and Final one are marked in ~~Track~~ and **Bold** for your convenience:

Sub-Rule	Task	
2	The return form specified in sub-rule (2) shall be notified for suggestion from all persons <b>considering 2(a) to 2(e)</b>	11
2(a)	Inland Revenue ( <b>IR</b> ) Policy Wing shall identify the legal amendments (due to Finance Act) to be incorporated in income tax return forms	31
2(b)	Preparation of Change Request Form ( <b>CRF</b> ) shall be finalized by IR Policy Wing and Information Technology Wing, in consultation with PRAL	15
2(c)	Analysis and scrutiny of <b>CRF</b> by Chief Income Tax Policy and Chief Business Domain Team shall be conducted and the same shall be submitted to Member IR Policy for approval on the same day.	16
2(d)	PRAL shall complete configuration and development of the approved CRF	10
2(e)	User Acceptance Test ( <b>UAT</b> ) of the amended return forms on testing environment shall be finalized by IR Policy Wing and Information Technology Wing, in consultation with PRAL and the same shall be submitted to Member IR Policy for approval on the same day.	15
3	The Return Form shall remain available on the portal for suggestions	7
4	The final return form shall be notified	31
4(a)	IR Policy Wing and Information Technology Wing shall review the suggestions received from stakeholders	12 Ja

4(b)	<i>a new CRF, if required, shall be finalized by IR Policy Wing and Information Technology Wing, in consultation with PRAL approved by Member IR</i>	<i>40 15</i>
4(c)	<i>PRAL shall complete configuration and development of the approved CRF</i>	<i>45 20</i>
4(d)	<i>User Acceptance Test (UAT) of the final Return forms on testing environment shall be finalized by IR Policy Wing and Information Technology Wing, in consultation with PRAL</i>	<i>48 25</i>
4(e)	<i>Final income tax return forms shall be available on IRIS</i>	<i>31</i>
4(f)	<i>in case, any further amendments are introduced in Finance Act (i.e. through Supplementary Finance Act) that have an impact on the finally notified income tax return forms referred to at clause (e), such amendments shall be incorporated <del>accordingly</del>; <b>by seventh day of July of the Financial year next following; and</b></i>	<i>7</i>

3. *If requested by the Member IR Policy, the above timeline be extended by the FBR to such extent and subject to such conditions and limitations as it may deem proper.*

4. *We expect that the above process will avoid extension of time for filing the return, as we see every year and as seen for Tax Year 2020 too till 8.12.2020 till owing delayed SRO 822 dated 8.9.20 about Return Form (TLQC 1185 in trail, in blue, in italic and after double line refers).*

*Best regards*  
*Asif S Kasbati (FCA, FCMA & LLB)*