



Goods And Services Tax In India: Structure, Evolution, And Challenges For The Manufacturing Sector

Varsha Rajkumar

Research Scholar

Department of Economics and Co-operation

University of Mysore,

Mysuru, India

Abstract: The introduction of the Goods and Services Tax (GST) in India represents one of the most significant indirect tax reforms aimed at creating a unified national market and improving tax efficiency. By subsuming multiple central and state-level indirect taxes into a single tax framework, GST sought to eliminate cascading effects, simplify compliance, and enhance transparency in the taxation system. The manufacturing sector, being a major contributor to India's GDP, employment, and exports, occupies a crucial position in assessing the effectiveness of this reform. This paper provides a conceptual and analytical review of the structure and evolution of GST in India, with specific emphasis on its implications for the manufacturing sector. Using secondary data and an extensive review of existing literature, policy documents, and government reports, the study examines the dual GST model, rate structure, input tax credit mechanism, and institutional framework governing GST. The paper also identifies key challenges faced by the manufacturing sector under the GST regime, including rate complexity, compliance burden, working capital pressures, and transitional issues. The study concludes by highlighting the need for continued policy refinement to ensure that GST achieves its intended objectives of efficiency, competitiveness, and sustainable industrial growth.

Keywords: Goods and Services Tax, Manufacturing Sector, Indirect Tax Reform, GST Structure, India

1. Introduction:

The taxation system plays a vital role in shaping the economic structure and growth trajectory of a country. In India, the indirect tax regime prior to the introduction of the Goods and Services Tax (GST) was characterised by multiple taxes levied by the Central and State governments, resulting in complexity, cascading effects, and distortions in production and distribution decisions. The implementation of GST on 1 July 2017 marked a landmark reform in India's tax history, aimed at rationalising the indirect tax structure and establishing a harmonised tax system across the country.

GST was introduced with the objectives of simplifying tax administration, broadening the tax base, improving compliance, and creating a common national market. By integrating various indirect taxes such as excise duty, service tax, and value-added tax into a unified framework, GST sought to enhance efficiency and transparency in the taxation system. The adoption of a dual GST model, comprising Central GST (CGST), State GST (SGST), and Integrated GST (IGST), reflects India's federal structure while ensuring uniformity in tax implementation.

The manufacturing sector occupies a central position in the Indian economy due to its significant contribution to gross domestic product, employment generation, and export performance. Tax reforms such as GST have direct and indirect implications for manufacturing activities, influencing production costs, pricing decisions, supply chain management, and overall competitiveness. While GST was expected to benefit the manufacturing sector by eliminating tax cascading and facilitating seamless input tax credit, the transition to the new regime has also presented several operational and compliance-related challenges.

In this context, the present paper aims to provide a comprehensive review of the structure and evolution of GST in India and to examine the challenges associated with its implementation from the perspective of the manufacturing sector. The study is based on secondary sources, including government reports, policy documents, and existing academic literature, and seeks to contribute to the broader understanding of GST as a transformative tax reform in India.

1.2. Objectives of the Study:

1. To examine the evolution of the indirect tax system in India leading to the introduction of the Goods and Services Tax.
2. To analyse the structural framework of GST in India, including its dual model and institutional mechanisms.
3. To assess the relevance of GST for the manufacturing sector in India from a conceptual perspective.
4. To identify the major challenges faced by the manufacturing sector under the GST regime.
5. To highlight recent reforms in the GST framework and suggest the way forward for improving its effectiveness.

1.3. Data Sources and Methodology:

The present study is conceptual and descriptive in nature and is based exclusively on secondary sources of data. Relevant information has been collected from published government documents, policy reports, official publications, and existing academic literature related to the Goods and Services Tax in India. Key sources include reports and notifications issued by the Ministry of Finance, Goods and Services Tax Council, Reserve Bank of India, Economic Survey of India, and publications of the Goods and Services Tax Network (GSTN). In addition, scholarly articles, working papers, and reports by reputed research institutions have been reviewed to provide analytical insights.

The methodology adopted in the study involves a qualitative review and synthesis of literature to examine the evolution and structural framework of GST and to analyse its implications for the manufacturing sector. The study does not use any primary data, statistical testing, or econometric analysis. Instead, it relies on analytical interpretation of existing literature and policy developments to identify key challenges and recent reforms in the GST framework. This approach enables a comprehensive understanding of GST as an indirect tax reform and its relevance to the manufacturing sector in India.

2. Evolution of the Indirect Tax System in India:

India's indirect tax system has undergone several phases of reform aimed at improving revenue efficiency, reducing distortions, and simplifying the tax structure. Prior to the introduction of the Goods and Services Tax (GST), the indirect tax regime was characterised by a multiplicity of taxes levied by both the Central and State governments. These included central excise duty, service tax, value-added tax (VAT), central sales tax, entry tax, octroi, and various cesses and surcharges. The existence of multiple taxes at different stages of production and distribution resulted in cascading effects, higher compliance costs, and fragmentation of the domestic market.

The reform process of India's indirect tax system began gradually in the post-independence period, with early efforts focusing on revenue mobilisation to support planned economic development. A significant milestone in indirect tax reform was the introduction of the Modified Value Added Tax (MODVAT) in 1986, which allowed limited credit of excise duty paid on inputs. This marked the first attempt to move towards a value-added taxation system at the manufacturing stage. Subsequently, service tax was introduced in 1994 on a limited number of services, and its scope was expanded steadily over time, reflecting the growing importance of the service sector in the Indian economy.

At the state level, the replacement of sales tax with Value Added Tax (VAT) in 2005 represented a major reform. VAT helped reduce the cascading effect of taxes and improved tax compliance through an input tax credit mechanism. However, the coexistence of central VAT (excise duty), service tax, and state-level VAT continued to create inefficiencies, as input tax credit across taxes was not seamless. Inter-state trade remained subject to central sales tax, which further distorted supply chain decisions.

The idea of a comprehensive Goods and Services Tax was proposed as a solution to these structural weaknesses. The objective was to integrate taxation of goods and services under a unified framework and to create a common national market. After years of deliberation, constitutional amendments, and negotiations between the Centre and the States, GST was finally implemented on 1 July 2017. The introduction of GST marked a paradigm shift in India's indirect tax system by subsuming most indirect taxes into a single tax structure and establishing a destination-based, value-added taxation system.

3. Structure of the Goods and Services Tax in India: Recent Developments

The Goods and Services Tax (GST) in India is structured as a destination-based, value-added tax designed to integrate the taxation of goods and services under a unified framework. India has adopted a concurrent dual GST model, reflecting its federal structure, wherein both the Central and State governments possess the power to levy and collect tax on the same taxable base. Under this model, GST is levied in the form of Central Goods and Services Tax (CGST) and State Goods and Services Tax (SGST) on intra-state transactions, while Integrated Goods and Services Tax (IGST) is imposed on inter-state transactions and imports.

Since its implementation in 2017, the structural framework of GST has undergone several refinements to address operational challenges and improve efficiency. One of the core components of the GST structure is the input tax credit (ITC) mechanism, which allows seamless credit of taxes paid on inputs and input services across the supply chain. The ITC system aims to eliminate cascading effects of taxation and reduce the overall tax burden on manufacturers. Over time, the government has introduced tighter compliance requirements and technological controls to prevent misuse of ITC, thereby strengthening the credibility of the tax system.

The GST rate structure initially comprised multiple tax slabs—0 per cent, 5 per cent, 12 per cent, 18 per cent, and 28 per cent—along with special rates for specific goods such as precious metals. While this multi-rate structure was intended to balance revenue considerations with social equity, it also added complexity for businesses, particularly in the manufacturing sector. In response, the GST Council has periodically rationalised tax rates, shifted items to lower slabs, and reduced the number of goods subject to the highest tax rate. These efforts reflect an ongoing attempt to simplify the rate structure while maintaining revenue neutrality.

Institutional support plays a crucial role in the functioning of the GST system. The Goods and Services Tax Council, a constitutional body, serves as the apex decision-making authority responsible for recommending tax rates, exemptions, procedural rules, and policy reforms. Over the years, the Council has played a key role in addressing stakeholder concerns and introducing reforms aimed at easing compliance, especially for small and medium manufacturing units. In addition, the Goods and Services Tax Network (GSTN) provides the technological backbone for GST administration, enabling return filing, tax payments, invoice matching, and data analytics. Continuous upgrades to the GSTN platform have improved system stability and enhanced ease of doing business.

Recent reforms in the GST framework have focused on improving compliance, enhancing transparency, and strengthening revenue mobilisation. Measures such as the introduction of e-invoicing for larger businesses, simplification of return filing procedures, and increased use of data analytics for monitoring compliance indicate a shift towards a more technology-driven tax administration. These structural adjustments signify the evolving nature of GST in India and its gradual transition from an initial implementation phase to a more mature and stabilised tax regime.

4. Goods and Services Tax and the Manufacturing Sector in India:

The manufacturing sector occupies a pivotal position in the Indian economy due to its contribution to gross domestic product, employment generation, and export performance. Tax reforms such as the Goods and Services Tax (GST) have a direct bearing on manufacturing activities, as taxes influence production costs, pricing decisions, supply chain structures, and overall competitiveness. The introduction of GST was expected to create a more neutral and efficient tax environment for manufacturing firms by eliminating cascading taxes and enabling seamless flow of input tax credit across the value chain.

One of the primary anticipated benefits of GST for the manufacturing sector was the removal of multiple indirect taxes that were previously levied at different stages of production and distribution. Under the pre-GST regime, manufacturers faced tax-on-tax due to the limited availability of cross-credit between excise duty, service tax, and value-added tax. GST addressed this issue by integrating taxes on goods and services, thereby allowing manufacturers to claim credit for taxes paid on both inputs and input services. This was expected to reduce production costs and improve price competitiveness in both domestic and international markets.

GST has also influenced the organisation of supply chains in the manufacturing sector. Prior to GST, firms often structured their warehouses and distribution networks based on tax considerations rather than operational efficiency, particularly to avoid inter-state taxes such as the central sales tax. With the introduction of IGST and the removal of inter-state tax barriers, manufacturers gained greater flexibility to optimise logistics and warehouse locations based on cost efficiency and market access. This structural change has the potential to enhance economies of scale and improve overall productivity in the manufacturing sector.

From a policy perspective, GST was envisaged as a reform that would support the growth of the manufacturing sector by promoting transparency and formalisation. The requirement for invoice-based reporting and digital compliance has encouraged greater disclosure of transactions, thereby integrating more firms into the formal tax system. While this has improved tax compliance, it has also increased the compliance responsibilities of manufacturing units, particularly during the initial years of implementation.

In recent years, policy efforts have focused on balancing compliance requirements with ease of doing business for manufacturers. Measures such as simplified return filing procedures, threshold-based exemptions, and technology-driven compliance mechanisms have been introduced to reduce administrative burden. These

initiatives indicate an ongoing effort to align the GST framework with the operational realities of the manufacturing sector, while ensuring revenue stability and tax discipline.

5. Challenges of the Goods and Services Tax for the Manufacturing Sector:

Despite its intended objectives of simplification and efficiency, the implementation of the Goods and Services Tax has posed several challenges for the manufacturing sector in India. Many of these challenges are transitional in nature, while others stem from structural and operational aspects of the GST framework. Understanding these issues is essential for evaluating the effectiveness of GST as an instrument of industrial development.

One of the major challenges faced by manufacturing firms is the complexity associated with the GST rate structure. Although efforts have been made to rationalise tax slabs, the existence of multiple rates continues to create classification issues and compliance difficulties. Manufacturers producing diversified product lines often face challenges in correctly classifying goods under appropriate tax slabs, leading to uncertainty and disputes. Frequent rate revisions and changes in notifications further add to compliance costs and operational uncertainty.

Compliance requirements under GST have also emerged as a significant concern for the manufacturing sector. The shift towards a technology-driven tax system requires regular filing of returns, invoice matching, reconciliation of input tax credit, and adherence to strict timelines. While larger manufacturing firms are better equipped to handle these requirements, small and medium manufacturing units often face capacity constraints in terms of technical knowledge and administrative resources. As a result, compliance costs have increased, particularly during the initial years of GST implementation.

Working capital management has been another critical challenge for manufacturers under GST. Delays in the refund of input tax credit, especially for exporters and firms engaged in zero-rated supplies, have affected liquidity positions. The requirement to pay tax at the time of supply, even before receiving payment from buyers, has placed additional pressure on working capital, particularly for manufacturing units operating on thin margins.

The transition to GST also involved adjustment challenges related to legacy issues, such as migration of existing tax credits, changes in pricing strategies, and renegotiation of contracts. Although many of these transitional issues have been addressed over time, their impact was more pronounced in the manufacturing sector due to its complex supply chains and multi-stage production processes. These challenges highlight the need for continuous policy review and administrative support to ensure that GST functions as an enabler rather than a constraint for manufacturing growth.

6. Recent Reforms in GST and the Way Forward:

Since its introduction, the Goods and Services Tax framework in India has evolved through a series of reforms aimed at addressing implementation challenges and improving the effectiveness of the tax system. Recognising the concerns raised by various stakeholders, including the manufacturing sector, the government

and the GST Council have undertaken several measures to simplify procedures, enhance compliance efficiency, and strengthen revenue administration.

One of the key areas of reform has been the rationalisation of GST rates. Over successive GST Council meetings, several goods have been shifted from higher tax slabs to lower ones, and the number of items attracting the highest rate has been gradually reduced. These changes reflect an effort to strike a balance between revenue considerations and the need to reduce the tax burden on producers and consumers. For the manufacturing sector, rate rationalisation has helped reduce pricing distortions and improve market competitiveness.

Another significant area of reform relates to compliance simplification. The government has introduced measures such as quarterly return filing for eligible taxpayers, simplified return formats, and threshold-based exemptions to ease the compliance burden, particularly for small and medium manufacturing units. The introduction of e-invoicing for larger businesses and the increased use of data analytics have enhanced transparency and reduced tax evasion, while also contributing to a more robust and credible tax administration system.

Technology-driven reforms have played a central role in strengthening the GST framework. Continuous upgrades to the Goods and Services Tax Network (GSTN) have improved system stability and user experience. Enhanced integration between tax authorities and digital platforms has facilitated better monitoring of transactions and more efficient enforcement. These developments indicate a gradual transition of GST from a reform-in-progress to a more mature tax system.

Looking ahead, further simplification of the rate structure, faster processing of refunds, and greater clarity in tax provisions are essential to maximise the benefits of GST for the manufacturing sector. Continued dialogue between policymakers and industry stakeholders will be crucial in ensuring that GST supports industrial growth, promotes ease of doing business, and contributes to long-term economic development.

7. Findings of the Study

Based on the conceptual analysis of existing literature, policy documents, and secondary sources, the study brings out the following key findings:

1. The introduction of the Goods and Services Tax represents a significant structural reform in India's indirect tax system by subsuming multiple central and state taxes into a unified framework.
2. The dual GST model adopted in India reflects the federal structure of the country and enables concurrent taxation by the Centre and the States, while facilitating a common national market.
3. The input tax credit mechanism under GST has the potential to reduce cascading effects of taxation and improve cost efficiency for manufacturing firms.
4. Despite its intended benefits, the GST framework continues to pose challenges for the manufacturing sector in terms of rate complexity, compliance requirements, and working capital management.

5. Recent reforms focusing on rate rationalisation, compliance simplification, and technology-driven administration indicate a gradual stabilisation of the GST system and a policy shift towards ease of doing business.

8. Suggestions for Future Studies:

The present study is conceptual in nature and is based on secondary data. Future research can build upon the findings of this paper in several ways:

1. Empirical studies using primary data may be undertaken to assess the impact of GST on specific aspects of the manufacturing sector such as production cost, profitability, employment, and supply chain efficiency.
2. Sector-specific studies can be conducted to examine variations in the impact of GST across different manufacturing industries and firm sizes.
3. Comparative studies across states or regions may provide insights into the differential implementation and performance of GST at the sub-national level.
4. Longitudinal studies may be useful in analysing the long-term impact of GST reforms on industrial growth and competitiveness.
5. Future research may also focus on recent and emerging GST reforms to evaluate their effectiveness in addressing compliance and administrative challenges.

9. Conclusion:

The introduction of the Goods and Services Tax represents a landmark reform in India's indirect tax system, aimed at simplifying taxation, eliminating cascading effects, and creating a unified national market. By integrating multiple central and state-level taxes into a single framework, GST has fundamentally altered the tax environment in which manufacturing firms operate. The adoption of a destination-based, value-added tax system has enhanced transparency and improved the potential for tax efficiency across the production and distribution chain.

From the perspective of the manufacturing sector, GST has offered several structural advantages, including seamless input tax credit, greater flexibility in supply chain management, and improved formalisation of business activities. At the same time, the transition to GST has been accompanied by challenges related to rate complexity, compliance burden, and working capital management. These issues have been particularly significant for small and medium manufacturing units, highlighting the need for supportive policy interventions.

The evolving nature of the GST framework demonstrates the government's responsiveness to stakeholder concerns. Recent reforms focusing on rate rationalisation, compliance simplification, and technology-driven administration indicate a gradual movement towards a more stable and efficient tax regime. While GST is

still undergoing refinement, its long-term success depends on continuous policy review, administrative clarity, and effective engagement with industry participants.

Overall, GST has laid the foundation for a more coherent and efficient indirect tax system in India. With sustained reforms and adaptive governance, the GST framework has the potential to strengthen the competitiveness of the manufacturing sector and contribute meaningfully to India's broader economic growth and industrial development.

References:

1. Government of India. (2016). *The Constitution (One Hundred and First Amendment) Act, 2016*. Ministry of Law and Justice, New Delhi.
2. Government of India. (2017). *Central Goods and Services Tax Act, 2017*. Ministry of Finance, New Delhi.
3. Government of India. (2017). *Integrated Goods and Services Tax Act, 2017*. Ministry of Finance, New Delhi.
4. Government of India. (2017). *State Goods and Services Tax Acts*. Respective State Governments.
5. Goods and Services Tax Council. (Various years). *GST Council Meeting Press Releases*. Government of India.
6. Goods and Services Tax Network (GSTN). (Various years). *GST System Reports and Updates*. <https://www.gstn.org.in>
7. Ministry of Finance. (2017). *GST: Concepts and Status*. Department of Revenue, Government of India.
8. Ministry of Finance. (2022). *GST Revenue Trends and Compliance Measures*. Department of Revenue, Government of India.
9. Reserve Bank of India. (2021). *State Finances: A Study of Budgets*. RBI, Mumbai.
10. Reserve Bank of India. (2022). *Handbook of Statistics on Indian Economy*. RBI, Mumbai.
11. Economic Survey of India. (Various years). *Ministry of Finance, Government of India*.
12. KPMG. (2018). *Impact of GST on the Manufacturing Sector in India*. KPMG India.
13. EY. (2019). *GST and the Indian Manufacturing Sector: Challenges and Opportunities*. Ernst & Young India.
14. OECD. (2018). *Consumption Tax Trends*. Organisation for Economic Co-operation and Development, Paris.

15. Poddar, S., & Ahmad, E. (2009). *GST Reforms and Intergovernmental Considerations in India*. National Institute of Public Finance and Policy (NIPFP), New Delhi.
16. Rao, R. K., & Rao, M. G. (2010). *GST in India: Challenges and Opportunities*. Economic and Political Weekly, 45(17), 63–72.

