

**THE FEDERAL TAX OMBUDSMAN  
ISLAMABAD**

**Complaint No.16190/KHI/ST/2026**

Dated: 07.09.2026 \* R.O. Karachi

**M/s. Stellar Fashion House (Pvt) Ltd,**  
Plot D-10/A, 3<sup>rd</sup> & 4<sup>th</sup> Floor,  
Block-H, North Nazimabad,  
Karachi

.....Complainant

**V e r s u s**

The Secretary,  
Revenue Division,  
Islamabad.

...Respondent

|                             |   |                                        |
|-----------------------------|---|----------------------------------------|
| Dealing Officer             | : | Mr. Badruddin Ahmad Quraishi, Advisor  |
| Authorized Representative   | : | Mr. Shafique Ahmed ITP.                |
| Departmental Representative | : | Mr. Aijaz Ali Channa, SAIR, CTO-II Khi |
| Date of hearings            | : | 24.09.2026 & 08.10.2026                |

**FINDINGS/RECOMMENDATIONS**

The above-mentioned complaint was filed in terms of Section 10(1) of the Federal Tax Ombudsman Ordinance, 2000 (FTO Ordinance) for non-resolution of the issues while filing sales tax returns for the tax periods August 2025 and onwards due to the implementation of SRO 350(I)/2024 dated 07.03.2024.

2. Briefly, the Complainant is engaged in the business of manufacturing leather and related products and is duly registered under the Sales Tax Act, 1990. The Complainant has been unable to file its monthly Sales Tax Returns from August 2025 onwards due to a system-generated error appearing on the FBR IRIS portal, whereby the return filing facility has remained locked and continuously displays the error message

***"Export GDs exist for current month."***

The Complainant has made repeated efforts to have the issue resolved and has approached both the concerned Commissioner



and Pakistan Revenue Automation Limited (PRAL) through written representations, bringing the system error to their attention and requesting necessary rectification. But the system error remains unresolved to date. The error displayed by the system relates to the alleged existence of Export Goods Declarations ("GDs") for the relevant period, the details whereof are as follows:

| Collector | GD Type | GD Number | GD Date     |
|-----------|---------|-----------|-------------|
| KPAE      | EC      | 10074     | 01-Aug-2025 |
| KPAE      | EC      | 14667     | 15-Aug-2025 |
| KPAE      | EC      | 57355     | 05-Jan-2025 |
| KPAE      | EC      | 13528     | 12-Aug-2025 |

The continued failure to resolve the system issue has placed the Complainant in an untenable position whereby it is legally required to file its Sales Tax Returns within the prescribed time, while at the same time the Department's own electronic system prevents it from doing so. The Complainant should not be made to suffer for a technical defect which is entirely beyond its control and which has already been repeatedly brought to the attention of the concerned authorities. The continued non-filing of the returns may further expose the Complainant to penalties, default surcharge, notices and other adverse consequences, despite the Complainant. The Complainant requested to immediately resolve the system-generated error "Export GDs exist for current month," unlock and restore the Sales Tax Return filing facility from August 2025 onwards, and enable the Complainant to file all its pending Sales Tax Returns.



3. The complaint was referred to the Secretary, of Revenue Division for comments in terms of Section 10(4) of the FTO Ordinance read with Section 9(1) of the Federal Ombudsmen Institutional Reforms Act, 2013. In response, the Principal Software Engineer, PRAL, vide letter dated 23.09.2026, has submitted

*"The Sales Tax return of M/s Stellar Fashion House (Pvt) Limited (NTN: 4984169) for the tax period of August 2025 was provisionally submitted on 19-SEP-2025.*

*If export GD exists in the filing month and is not linked with the return, then the return cannot be submitted. Once a return is provisionally submitted, annexures are locked. As per SRO 350, no sales or purchase invoices can be loaded or claimed thereafter.*

*Therefore, for unlocking of the return, explicit directions of the Board are required"*

8/10/2025

4. Arguments heard, and record perused.

5. Evidently, due to the implementation of SRO 350(I)/2024 dated 07.03.2024, the return filed for August 2025 by the complainant became provisional on 19.09.2025 due to non-linking of the export GDs with the return. If an export GD exists in the filing month and is not linked with the return, then the return cannot be submitted. Once a return is provisionally submitted, annexures are locked. As per SRO 350, no sales or purchase invoices can be loaded or claimed thereafter. Due to non-filing of return, the status of the complainant becomes "In Active". Moreover, as per the complaint, these four export GDs, as discussed in para 2, are appearing as pending in the system; but they are not being reflected in Annexure D of the sales tax return.

#### **FINDINGS:**

6. Not changing the provisional status of the sales tax return for the tax period August 2025 in violation of Rule 18(3) of Sales Tax Rules 2006 due to the recent introduction of SRO 350(I)/2024 dated 07.03.2024, tantamount to maladministration under Section 2(3)(i)(b),(ii) of FTO Ordinance.

#### **RECOMMENDATIONS:**

7. FBR to direct-

- i) the Chief Sales Tax (Ops) stationed in Karachi to give explicit approval to unlock the sales tax return of August 2025 and ensure appearance of export GDs in annexure D of the return for further loading as proposed by the PRAL expeditiously



- on merit and in accordance with the law; and
- ii) report compliance within 30 days.



Dated: 14 OCT 2026

**(M. Zafar ul Haq Hijazi)**  
Federal Tax Ombudsman

