



GST 2.0: Charting a New Trajectory for India's Indirect Tax Regime

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ABSTRACT

In a landmark economic decision, India has initiated a profound restructuring of its Goods and Services Tax (GST) regime, a reform widely referred to as GST 2.0, which officially commenced on September 22, 2025. This next-generation tax overhaul represents a paradigm shift from the initial, intricate multi-tiered structure to a streamlined dual-slab system. This research article presents a comprehensive and in-depth analysis of GST 2.0, meticulously examining its architectural nuances, the sophisticated economic philosophy that underpins it, and its anticipated, far-reaching impact on the Indian economy. The article delves into the granular sectoral implications, dissects the multifaceted challenges and informed criticisms accompanying this monumental transition, and evaluates the critical administrative and technological recalibrations essential for its successful implementation. Furthermore, it probes the long-term economic and social ramifications, the evolving dynamics of fiscal federalism in a post-GST 2.0 era, and critically situates India's ambitious reform within the broader, diverse landscape of international value-added tax (VAT) systems, offering a holistic perspective on this transformative fiscal policy.

1. Introduction: The Genesis and Imperative of GST 2.0

The GST is value added tax levied on most goods and services sold for domestic consumption. It was first determined by a German economist in the 18th century. (Sunita, 2024.) The government around the



globe are striving to improve their public finance to meet their public expenditures and for sustainable development of their economies. (Garg, Narwal, and Kumar 2024) Many countries use the Goods and Services Tax (“GST”) system to broaden their tax base for tax revenue collection. (Koh, Yee, and Yeow 2024) The introduction of the Goods and Services Tax on July 1, 2017, was undeniably a watershed moment in India's post-independence fiscal history. It was hailed as a "one nation, one tax" reform, designed to subsume a complex web of central and state indirect taxes—such as excise duty, service tax, VAT, and octroi—to forge a unified national market. The primary objective was to eliminate the cascading effect of taxes, simplify the tax structure, and enhance the ease of doing business. However, the initial framework, a compromise forged in the politically sensitive crucible of the GST Council, emerged with four main slabs (5%, 12%, 18%, and 28%), special rates for precious metals, and a supplementary layer of compensation cess on certain demerit and luxury goods.

The Goods and Services Tax (GST) is implemented to ensure India’s balanced economic development by simplifying the country’s cumbersome indirect tax system, allowing commodities to move freely across state and national borders, cutting tax evasion and ramping up the taxpayers’ base, improving compliance with taxation rules, increasing government revenues and attracting investors by making it easier to do business in India. (Singhal et al. 2022)

Over its eight years of operation, this initial structure, while a marked improvement over the pre-GST era, revealed several inherent complexities. Businesses, particularly Micro, Small, and Medium Enterprises (MSMEs), grappled with significant compliance burdens stemming from the multiple rates and the intricate rules governing Input Tax Credit (ITC). The frequent rate revisions by the GST Council, while responsive to industry demands, created an environment of tax uncertainty. Furthermore, the multi-slab structure led to a plethora of classification disputes, where businesses and tax authorities contested the appropriate slab for specific goods, often resulting in protracted litigation. A critical issue of "inverted duty structure"—where taxes on inputs were higher than those on the final product—plagued several sectors, leading to cash flow problems for businesses due to the slow refund of accumulated ITC. Recognizing these systemic frictions, various expert committees and industry bodies persistently advocated for a rationalization of the rate structure. The political and economic consensus gradually converged on the need for a more fundamental reform, moving beyond incremental changes to a complete overhaul. This growing imperative for a simpler, more efficient, and citizen-centric tax system was the crucible in which GST 2.0 was forged. It is not merely a course correction but a strategic re-envisioning of India's indirect tax policy for the next decade of economic growth.



2. The Architecture of GST 2.0: A Paradigm of Simplification

The defining characteristic of GST 2.0 is its radical departure from complexity towards a streamlined and intuitive tax architecture. The multi-layered edifice of the original GST has been carefully dismantled and replaced with a two-pronged primary structure, complemented by a distinct rate for demerit goods, aiming to bring clarity, reduce disputes, and ease compliance. Eight years on, **complexity persists**. Four slabs, frequent classification disputes, and a substantial overlay of **compensation cess** (especially on autos and tobacco) have kept **effective rates high** in several categories and **compliance friction** alive for businesses. (GST 2.0 IMPRI INSIGHTS 2025)

- **A 5% Merit Rate:** This foundational slab has been thoughtfully curated to encompass goods and services of mass consumption and social importance. It includes a vast array of essentials such as unpacked food grains, milk, fresh vegetables, and essential medicines, which remain at zero-rated or are kept within this minimal slab. Furthermore, it now consistently covers items like sugar, tea, coffee, edible oils, and most packaged food products. In the services domain, it applies to essential transportation services like economy class air travel and railways, as well as basic healthcare and educational services. The core principle is to insulate the common household's budget from inflationary pressures and ensure the affordability of life's necessities.
- **An 18% Standard Rate:** This rate has become the new fulcrum of the GST system, representing a significant convergence of the previous 12% and 18% slabs, and also pulling in a large number of items from the erstwhile 28% slab. It now applies to a vast spectrum of consumer goods, including electronics like smartphones and televisions, home appliances, and automobiles (specifically two-wheelers and smaller passenger cars). Most services, ranging from telecom and financial services to professional consultancies and branded apparel, also fall under this single standard rate. This harmonization is the single most important step in reducing classification disputes and simplifying the ITC chain for a majority of businesses operating in the Indian economy.
- **A 40% Rate for Sin and Luxury Goods:** Acknowledging the need for progressive taxation and a mechanism to discourage consumption of certain goods, a new, higher tax bracket has been strategically introduced. This 40% rate is applicable to items classified as "sin" goods, such as tobacco products and pan masala, and a curated list of luxury items, including high-end imported automobiles, private jets, and super-yachts. This rate effectively subsumes the previous 28% slab plus the compensation cess for these specific items into a single, transparent rate. This serves the dual purpose of generating substantial revenue, which helps maintain fiscal balance after the rate



cuts elsewhere, and acting as a fiscal deterrent for the consumption of goods with negative externalities.

Crucially, the treatment of items previously outside the GST net, like petroleum products (petrol, diesel, ATF), natural gas, alcohol for human consumption, and electricity, remains a subject of ongoing debate within the GST Council. While GST 2.0 has not brought them into the fold yet, the simplified structure is seen as a stepping stone that makes their eventual inclusion more feasible from a technical and political standpoint.

3. The Economic Rationale and Objectives of GST 2.0

The transition to a dual-slab GST structure is not an arbitrary administrative change; it is a meticulously planned economic strategy grounded in established macroeconomic principles and tailored to India's specific growth objectives.

- **Stimulating Aggregate Demand:** The core economic philosophy is to engineer a consumption-led boost to the economy. By significantly lowering the tax burden on a wide array of goods—from FMCG products to small cars—the reform directly increases the disposable income of households. This is expected to translate into higher discretionary spending, thereby increasing aggregate demand. Economists project a substantial multiplier effect, where the initial increase in consumption leads to higher production, which in turn creates more jobs and income, setting off a virtuous cycle of economic expansion. The government estimates that this tax relief will infuse over ₹2 lakh crore annually into the hands of consumers, providing a powerful demand-side stimulus.
- **Enhancing Ease of Doing Business and Reducing Compliance Costs:** The previous multi-rate system imposed significant compliance costs, especially on MSMEs, which often lack dedicated accounting resources. These costs included maintaining complex records, navigating intricate ITC rules, and dealing with the constant threat of litigation over HSN (Harmonized System of Nomenclature) code classifications. GST 2.0, with its simplified structure, drastically reduces these frictions. A single standard rate for most goods and services eliminates the ambiguity in classification, streamlines invoicing, and simplifies the process of filing returns and claiming ITC. This reduction in the "cost of compliance" directly improves business efficiency and profitability, making the Indian business environment more attractive.



- **Boosting Manufacturing Competitiveness and 'Make in India':** The rationalization of tax rates is a strategic intervention to bolster the domestic manufacturing sector. By ensuring that most raw materials and intermediate goods fall under the 18% standard rate, the reform helps to resolve the persistent issue of inverted duty structures. This ensures a seamless and efficient flow of ITC throughout the value chain, preventing the blockage of working capital for manufacturers. A more predictable and lower tax environment on inputs makes Indian manufactured goods more competitive, both in the domestic market against imports and in global export markets, thereby providing a significant impetus to the 'Make in India' initiative.
- **Taming Inflation and Improving Affordability:** The direct impact of placing a majority of essential and mass-market goods in the 5% slab is a tangible reduction in their final prices. This move is expected to have a significant disinflationary effect, particularly on the Consumer Price Index (CPI) basket, providing direct relief to households, especially those in the lower and middle-income brackets. This helps in managing inflation expectations and ensuring macroeconomic stability.
- **Improving Tax Buoyancy and Long-Term Revenue Collection:** While the immediate aftermath of the rate cuts might lead to a temporary dip in revenue, the long-term objective is to enhance tax buoyancy—the responsiveness of tax revenue to changes in GDP. Economic theory suggests that lower, simpler tax rates lead to higher voluntary compliance and discourage tax evasion. By bringing more businesses into the formal net and stimulating economic activity, the government anticipates that the expansion of the overall tax base will, in the medium to long term, lead to more robust and sustainable revenue growth than the previous high-rate, complex structure.

4. Sectoral Impact Analysis: A Deep Dive

The seismic shift in the GST structure is set to reconfigure the economic landscape for virtually every sector. The implications are profound, extending beyond mere price changes to affect supply chain dynamics, investment decisions, and consumer behavior. Overall, the effectiveness of the GST amendments can be seen in the improved tax compliance, increased economic growth and reduced tax burden on the common man. (Dubey and Sinha 2024)

- **Fast-Moving Consumer Goods (FMCG):** This sector is arguably the most significant beneficiary. A vast range of daily-use items—soaps, toothpaste, hair oil, detergents, and most packaged foods—have seen their tax rates fall, in many cases from 18% to 5%. This has a dual



positive effect: it allows companies to either reduce prices to drive volume growth or reinvest the margin in marketing and distribution to expand their reach, particularly in semi-urban and rural markets where price sensitivity is high. The simplified ITC chain for raw materials and packaging also improves operational efficiency for FMCG manufacturers.

- **Automotive Sector:** The industry receives a much-needed stimulus. The reduction of GST on two-wheelers, small passenger cars, and utility vehicles from 28% to the standard 18% rate translates into a substantial on-road price reduction. This is expected to revive sluggish demand, especially in the entry-level and mid-range segments, which form the bulk of the market. For the commercial vehicle segment, the uniform 18% rate on inputs and final products streamlines the entire manufacturing process, enhancing the sector's health, which is often seen as a barometer of the broader economy.
- **Real Estate and Construction:** This vital, employment-intensive sector gets a significant boost. The reduction of GST on key construction materials like cement, steel, and paints to 18% directly lowers the cost of construction for developers. This benefit, if passed on, can make housing more affordable for end-users and improve the viability of affordable housing projects. This reform, coupled with the existing lower GST rates on affordable housing units, is expected to stimulate construction activity across the country.
- **Hospitality, Tourism, and Aviation:** The rationalization of GST rates for hotel accommodation and restaurant services to a uniform 18% (with full ITC benefits) simplifies operations and improves affordability for consumers. This makes dining out and travel more attractive, providing a fillip to a sector that is a major contributor to foreign exchange earnings and employment. Similarly, the lower tax on economy air travel makes flying more accessible, boosting regional connectivity and tourism.
- **Textiles and Apparels:** This sector, which has traditionally struggled with a complex duty structure, benefits immensely from the streamlined rates. A more uniform GST across the entire value chain—from fiber to finished garments—resolves the issue of inverted duty structures and ensures a seamless flow of credit. This enhances the competitiveness of Indian textiles in the global market.
- **MSMEs:** Beyond any single sector, MSMEs are the universal beneficiaries. For them, the biggest impact is the drastic reduction in the complexity of compliance. With fewer rates to worry about,



the scope for errors in filing returns reduces, and the need for expensive tax consultancy diminishes. A simplified and transparent system empowers small entrepreneurs to focus on innovation, quality, and business expansion rather than navigating a labyrinthine tax code.

5. Challenges, Criticisms, and the Uncharted Path Ahead

While GST 2.0 is being hailed as a transformative reform, its implementation journey is fraught with significant challenges and has invited valid criticisms from various quarters. A balanced assessment requires a clear-eyed view of these potential hurdles.

- **Revenue Implications and Fiscal Prudence:** The most pressing concern is the potential for a significant short-term revenue shortfall for both the central and state governments. **Revenue Loss:** Government may face **₹85,000 crore annual loss** due to reduced rates. (GST 2.0: SBI 2025)
- The exchequer will face a direct hit from the drastic rate cuts. While the government's models project that increased consumption and improved compliance will create a V-shaped recovery in revenues, this outcome is not guaranteed. A prolonged period of lower-than-expected collections could strain public finances, potentially impacting capital expenditure and fiscal deficit targets. The government's contingency plans and fiscal buffers will be severely tested in the initial one to two years.
- **Fiscal Federalism and State Autonomy:** The GST regime is a cornerstone of India's fiscal federalism, and any major change impacts the delicate balance of power between the Centre and the states. States have sacrificed a significant portion of their fiscal autonomy by subsuming their taxes into the GST. A key concern is how the new structure will affect the revenue of individual states, particularly manufacturing-heavy states versus consumption-heavy states. The mechanism for compensating states for any revenue loss, and the future of the compensation cess itself, will be critical points of negotiation and potential friction within the GST Council.
- **Transitional Hurdles for Industry:** The transition to a new tax structure, however simplified, is a massive undertaking for businesses. It necessitates immediate changes to Enterprise Resource Planning (ERP) systems, accounting software, and invoicing protocols. There is a risk of initial confusion, leading to errors in compliance. Businesses will also need to manage their inventory and pricing strategies carefully during the transition to avoid both windfall profits and undue losses, which will be monitored by anti-profiteering authorities.



- **The Specter of Inflationary Stickiness and Market Behaviour:** A crucial assumption of the reform is that businesses will pass on the full benefit of the tax cuts to the end consumers. However, in markets with imperfect competition, businesses might choose to absorb a portion of the tax cut to bolster their margins. If this happens on a large scale, the anticipated disinflationary impact and the consumption boost could be diluted. Effective monitoring by price watchdogs and anti-profiteering bodies will be essential to ensure the intended benefits reach the public.
- **Classification Conundrums and the Grey Market:** While simplification is the goal, the new 40% slab for luxury goods could create fresh classification disputes. The line between a standard product and a luxury product can be subjective, potentially leading to new avenues for litigation. Furthermore, an exceptionally high tax rate on certain goods like tobacco creates a powerful economic incentive for tax evasion and could lead to the growth of a parallel illicit or grey market, which would undermine both the revenue and public health objectives of the high tax rate.

6. Administrative and Technological Preparedness: The Digital Bedrock

The success of GST 2.0 is inextricably linked to the robustness and agility of its underlying administrative and technological infrastructure. The Goods and Services Tax Network (GSTN), the digital backbone of the system, must undergo a seamless evolution to support the new framework.

- **Upgrading the GSTN Portal and E-Infrastructure:** The immediate technical challenge is the comprehensive overhaul of the GSTN portal. This involves updating the core software to recognize the new rate structure, modifying the return filing forms (like GSTR-1 and GSTR-3B), and ensuring that the automated ITC matching and settlement processes function flawlessly under the new regime. The e-invoicing and e-way bill systems must also be recalibrated to align with the revised rates to ensure uninterrupted movement of goods and real-time data capture.
- **Leveraging AI and Data Analytics for Tax Administration:** GST 2.0 provides a unique opportunity to enhance the use of advanced data analytics and artificial intelligence (AI) in tax administration. With a simpler data structure, it becomes easier for authorities to analyze consumption patterns, detect anomalies, and identify potential tax evasion with greater accuracy. AI-powered risk assessment models can be deployed to target audits more effectively, moving towards a non-intrusive, data-driven compliance environment. This "smart administration" is key to realizing the goal of improved tax buoyancy.



- **Capacity Building and Stakeholder Education:** A massive, nationwide campaign for capacity building is indispensable. This involves intensive training programs for tax officials at both central and state levels to ensure uniform interpretation and application of the new laws. Simultaneously, extensive outreach programs, webinars, and workshops are required for businesses, trade associations, and tax practitioners to educate them about the procedural changes. Clear, concise FAQs and user-friendly guides are essential to facilitate a smooth transition for millions of taxpayers.

7. Long-Term Economic and Social Implications: Reshaping the Nation

The true impact of GST 2.0 will unfold over the coming decade, potentially reshaping the fundamental contours of India's economic and social landscape.

- **Propelling GDP Growth and Attracting Investment:** Beyond the immediate consumption boost, the reform is expected to have a structural impact on economic growth. The enhanced ease of doing business, improved manufacturing competitiveness, and a more transparent tax environment are powerful signals to both domestic and foreign investors. A simpler GST regime can improve India's ranking on global competitiveness indices, potentially attracting higher flows of Foreign Direct Investment (FDI) into the manufacturing and service sectors, thereby lifting the country's potential GDP growth rate.
- **Accelerating the Formalization of the Economy:** A simple tax system with low rates is one of the most effective instruments for encouraging formalization. For many small businesses operating in the informal sector, the high cost and complexity of compliance were major deterrents. By lowering this entry barrier, GST 2.0 incentivizes them to join the formal economy. This has profound long-term benefits: it widens the tax base, improves access to formal credit for small businesses, and brings more workers under the protection of social security nets.
- **Enhancing Social Equity and Distributional Impact:** The reform has significant distributional implications. By substantially reducing the tax burden on essential goods and services that form a large part of the consumption basket for lower-income households, GST 2.0 is inherently progressive in its impact. It effectively increases the real income of the poor and the lower-middle class, contributing to greater social equity. This can lead to improved nutritional outcomes, better access to essential services, and a higher standard of living for the most vulnerable sections of society.



8. India's GST 2.0 in the Global Context: A Unique Federal Model

Placing India's reform in an international context reveals the uniqueness and ambition of its approach. Most developed economies, like those in the European Union or Australia, have adopted a single standard VAT rate with very few exemptions. While this is the epitome of simplicity, it may not be suitable for a diverse developing country like India with significant income disparities.

India's dual-rate model under GST 2.0 is a pragmatic middle path. It borrows the simplicity of fewer rates but retains the progressivity of having a lower rate for essential goods, a feature common in many emerging economies. The approach can be contrasted with a complex federal system like Brazil's, which has multiple overlapping indirect taxes at federal and state levels, leading to significant compliance burdens. India's model, managed through a coordinating body like the GST Council, offers a unique framework for cooperative federalism in tax policy. The lessons learned from India's large-scale transition to a simpler structure will be closely watched by other federal countries and developing economies considering similar VAT reforms.

9. Conclusion: A Transformative Leap Towards a 'Good and Simple' Tax

GST 2.0 is unequivocally more than an incremental policy tweak; it is a bold and transformative leap in the evolution of India's economic governance. By decisively choosing simplicity over complexity, and prioritizing the welfare of citizens and the efficiency of businesses, this reform has the potential to unleash a new wave of economic dynamism. It aims to rectify the structural flaws of its predecessor and create a tax system that is truly a "Good and Simple Tax."

The journey ahead will not be without its share of turbulence. Managing the fiscal implications, ensuring a seamless transition for millions of businesses, and maintaining the delicate consensus of fiscal federalism will require deft political and administrative handling. The long-term success of this monumental reform will be contingent on its flawless implementation, the responsible behaviour of market players in passing on benefits, and the continuous agility of the GST Council to respond to emerging challenges. If these conditions are met, GST 2.0 will not just be remembered as a tax reform; it will be chronicled as a pivotal economic event that helped chart a course for a more prosperous, competitive, and equitable India in the 21st century.



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