

CHAPTER-V

Stamp Duty and Registration Fee

5.1 Tax administration

The State Government exercises control over the registration of instruments through the Inspector General of Registration, who is assisted by the Deputy Commissioners, Tehsildars and Naib-Tehsildars acting as Registrars, Sub-Registrars (SR) and Joint Sub-Registrars (JSRs) respectively. No registration work is however, done in the offices of the Registrars. The Registrar exercises superintendence and control over the SRs and JSRs of the district. For the purpose of levy and collection of stamp duty and registration fee, the State has been divided into four divisions and 20 districts having 20 Registrars, 78 SRs and 76 JSRs. In the year 2000 the National Informatics Centre had developed, a 'Property Registration Information System Module (PRISM)' to automate the major activities of the Sub-Registrar Offices.

The Indian Stamp Act, 1899 provides for levy and adjudication of stamp duty, allowances for stamps in certain cases, revisions, levy of penalties and prosecution in the case of instruments not duly stamped.

The Indian Registration Act, 1908 provides for the compulsory or optional registration of documents and prescribes the time and place for presenting such documents, fee for registration, searches, penalties and prosecutions for offences.

The State Government had framed the Punjab Stamp Rules for tax administration in the State. These Rules govern:

- a) the supply and keeping of stamps;
- b) licencing of vendors and sale and stock of stamps and
- c) inspection and control.

5.2 Trend of receipts

The actual receipts from stamp duty and registration fee during the period 2005-06 to 2009-10 along with the total tax and non-tax receipts during the same period are exhibited in the following table and graph:

(₹ in crore)						
Year	Revised budget estimates	Actual receipts	Variation excess (+)/shortfall (-)	Percentage of variation	Total tax and non-tax receipts of the State	Percentage of actual receipts to the total receipts
2005-06	1,600.50	1,670.50	(+) 70.00	(+) 4.37	13,525.71	12.35
2006-07	2,000.00	1,803.93	(-) 196.07	(-) 9.80	16,761.74	10.76
2007-08	1,700.00	1,567.84	(-) 132.16	(-) 7.77	15,153.14	10.35
2008-09	1,900.00	1,730.29	(-) 169.71	(-) 8.93	16,934.10	10.22
2009-10	2,015.00	1,550.94	(-) 464.06	(-) 23.03	17,692.18	8.77

It can be seen from the above data that there was decline in stamp duty receipts from ₹ 1,670.50 crore in 2005-06 to ₹ 1,550.94 crore in 2009-10 and the collections were far below the budget estimates in 2009-10 by 23 per cent.

The percentage of receipts from stamp duty and registration fee to the total receipts in the State remained more or less stagnant at 10 during the period 2005-10.

The Government stated (August 2010) that the main reasons for decrease in the revenue collection were the less number of registration deeds preferred by the public and the recession.

5.3 Cost of collection

The gross collection in respect of stamp duty and registration fee, expenditure incurred on their collection and the percentage of such expenditure to the gross collection during the years 2005-06 to 2009-10 alongwith the all India average percentage of expenditure on collection are mentioned below:

(₹ in crore)

Head of Revenue	Year	Gross collection	Expenditure on collection	Percentage of expenditure to gross collection	All India average percentage of expenditure to collection
Stamp duty and registration fee	2005-06	1,670.50	20.22	1.21	2.87
	2006-07	1,803.93	30.21	1.67	2.33
	2007-08	1,567.84	18.22	1.16	2.09
	2008-09	1,730.29	23.69	1.37	2.77
	2009-10	1,550.94	12.42	0.80	-

The percentage of expenditure to the total collection of stamp duty and registration fee in the State was lower than the All India average percentage.

5.4 Impact of audit

Revenue impact

During the last five years, audit through its reports had pointed out non/short levy etc., involving revenue implication of ₹ 145.80 crore in 3,467 paragraphs. Of these, the Department/Government had accepted audit observations in 1,192 paragraphs involving ₹ 14.95 crore and had recovered ₹ 2.21 crore. The details are shown in the following table:

(₹ in crore)

Year	Number of units audited	Amount objected		Amount accepted		Amount recovered	
		No. of cases	Amount	No. of cases	Amount	No. of cases	Amount
2004-05	93	865	35.21	524	2.83	101	0.31
2005-06	127	909	7.90	114	3.95	51	0.17
2006-07	99	458	11.05	325	7.41	203	0.92
2007-08	132	919	49.32	205	0.45	121	0.44
2008-09	116	316	42.32	24	0.31	88	0.37
Total	567	3,467	145.80	1,192	14.95	564	2.21

The Government may consider issuing of instructions for recovery of the revenue at least in the accepted cases on priority.

5.5 Results of audit

Test check of the records of 141 units relating to stamp duty and registration fee during 2009-10 revealed irregularities involving ₹ 58.08 crore in 562 cases, which fall under the following categories:

(₹ in crore)

Sl. No.	Categories	Number of cases	Amount
1.	Review of 'Levy and Collection of Stamp Duty and Registration Fee'	1	29.20
2.	Non/short levy of stamp duty and registration fee	303	13.55
3.	Short levy of stamp duty and registration fee on lease deeds	12	0.17
4.	Misclassification of instruments	23	1.69
5.	Other irregularities	223	13.47
Total		562	58.08

During the year 2009-10, the Department accepted the audit observations involving ₹ 32.57 lakh in 23 cases and recovered ₹ 1.78 crore in 272 cases pertaining to the audit findings of the earlier years.

A Performance Audit of 'Levy and collection of stamp duty and registration fee' involving financial impact of ₹ 29.20 crore is described in the following paragraph.

5.6 Performance Audit of Levy and Collection of Stamp Duty and Registration Fee

Highlights

There were evasions of stamp duty and registration fee on sale of immovable property on powers of attorney and due to non-registration of agreements for sale.

(Paragraph 5.6.5)

Misclassification of the instruments as agreements instead of deeds of conveyance resulted in non-levy of stamp duty and registration fee amounting ₹ 1.07 crore.

(Paragraph 5.6.6)

There are no explicit provisions in the General Clauses (GC) Act, 1897 empowering the Government to remit the registration fee.

(Paragraph 5.6.7)

Non-verification of stamp duty resulted in acceptance of fraudulently tempered bank receipts of ₹ 42.60 lakh.

(Paragraph 5.6.8)

Inadmissible remissions of stamp duty and registration fee of ₹ 20.59 crore were noticed on instruments of conveyance, mega projects, subsidiary/ associate companies of the promoter companies, mortgages for securing loan and charitable institutions.

(Paragraph 5.6.9)

Internal Control Mechanism prescribed for vendor records was not followed by the Departmental officers. Non-settlement of large number of internal audit objections had rendered the internal audit function ineffective.

(Paragraph 5.6.11)

There were sale of fake stamps of ₹ 85.45 lakh not found entered in the vendor records.

(Paragraph 5.6.11.2)

The NIC maintained software for registration activities PRISM, had several general and applications control deficiencies, resulting in manual intervention.

(Paragraph 5.6.13)

5.6.1 Introduction

Registration of the documents attracts levy of stamp duty and registration fee. The levy of stamp duty on various types of the instruments namely conveyance, exchange, mortgage and lease etc., is governed by the Indian Stamp Act, 1899 (Stamp Act) and the Rules framed thereunder. The duty is paid by the executors of instruments either by using impressed stamps or by affixing stamps (non-judicial) of proper denomination. The levy of registration fee on the instruments presented for registration is regulated by the Indian Registration Act, 1908 (Registration Act) and the Rules framed thereunder. In the context of large number of deficiencies in the registration process reported repeatedly in the Inspection Reports by us and computerisation of some of the

activities in the Sub-Registrar offices, we considered it necessary to undertake Performance Audit of the levy and collection of stamp duty and registration fee in the State.

5.6.2 Audit objectives

The Performance Audit was conducted with a view to ascertain:

- the compliance of the prescribed rules and procedures while registering the documents;
- the efficiency and effectiveness of the system and procedures relating to the levy and collection of the stamp duty and registration fee;
- the adequacy and effectiveness of the internal control system for timely detection of deficiencies for initiating suitable remedial measures; and
- the utilisation and effectiveness of the PRISM.

5.6.3 Scope and methodology of audit

A mention was made in paragraph 4.2 of the Report of the Comptroller and Auditor General of India for the year ended 31 March 2005 (Revenue Receipts) Government of Punjab, highlighting the shortcomings during the years 1999-2000 to 2003-04 regarding the levy and collection of stamp duty and registration fee. With a view to ascertain the present functioning of the Department in ensuring correctness of the levy and collection of stamp duty and registration fee, test check of the relevant records for the years from 2004-05 to 2008-09 was conducted during August 2009 and March 2010. We conducted the audit in 38¹ out of the 154 Registering offices in the State.

Computerisation of the registration activities in the State of Punjab was also examined as an integral part of the Performance Audit, by examining the records in Seven SRs². The SQL³ database maintained in the Sub Registrar Offices at Ludhiana (November 2008 to March 2009) and Sangrur (2008-09) was analysed to assess the controls for completeness, authenticity and reliability. An Interactive Data Extraction and Analysis (IDEA) tool was used in audit for analysing the data.

5.6.4 Acknowledgement

The Indian Audit and Accounts Department acknowledges the cooperation of the Revenue Department for providing information and records for audit. An entry conference was held with the Inspector General of Registration, Punjab at Jalandhar on 14 September 2009. During the conference, the objective, scope and methodology of audit was explained. The Department informed about shortage of staff, need for State level ready reckoner for valuation of

¹ Amritsar-I, Ajnala, Amlah, Bholath, Barnala, Bathinda, Baghapurana, Faridkot, Gurdaspur, Gidderbaha, Jalandhar-I, Jagraon, Kapurthala, Khanna, Ludhiana(East), Mansa, Moga, Mohali, Mukerian, Nakodar, Nawanshahr, Patti, Patran, Payal, Phagwara, Phillaur, Ropar, Raikot, Sangrur, Samrala, Sultanpur Lodhi, Samana,Zira,, Banga, Goraya, Kartarpur, Machhiwara and Mullanpur Dakha.

² Jalandhar-I, Jalandhar-II, Ludhiana (Central), Ludhiana (East), Ludhiana (West), Patiala and Sangrur.

³ Structured Query Language.

properties for the purpose of levy of stamp duty, need for early completion of computerisation of the registration process and training of the officers and staff. An exit conference with the Secretary Revenue, Government of Punjab was held on 31 August 2010 in which important audit findings and recommendations were discussed.

The draft review was forwarded to the Department and the Government in June 2010. The replies received during the exit conference and at other point of times have been incorporated.

The Performance Audit revealed many systems and compliance deficiencies in the levy and collection of stamp duty and registration fee. These are discussed in the subsequent paragraphs.

System deficiencies

5.6.5 Possible evasion of stamp duty and registration fee on Power of Attorney for sale of immovable property

❖ As per Articles 48 (f) and (ff) of Schedule I-A (for Punjab) of the Indian Stamp Act, on instruments of power of attorney wherein the power when given for consideration and authorising the attorney to sell any immovable property or when given for consideration and/or for authorising possession of the immovable property, the same duty is leviable as applicable to the deeds of conveyance

❖ The Government of Punjab, communicated to all registering authorities in the State (December 2007) that it was in their knowledge that instruments of Power of Attorney were being executed in a large number to sell immovable property to evade stamp duty. The ROs were directed that the persons executing the power of attorney authorising to sell immovable property should specifically state in the instrument as to whether

(a) the possession of the property had been handed over or not, and

(b) the power of attorney was granted for consideration or not.

Failure to check the above conditions would invite administrative action against them.

We noticed in 16 SR/JSR⁴ offices that 1, 35,123 instruments of general power of attorney were registered during the years 2004-05 to 2008-09. Of these, 4,994 instruments were test checked and in 1,463 instruments of power of attorney registered during the year 2008-09, the power to sell and transfer the immovable properties and to hand over the possession thereof in favour of the third persons other than the blood related⁵ had been granted with a view to evade the levy of stamp duty and registration fee. The instruments of power of attorney attract nominal stamp duty of ₹ 300 and registration fee of ₹ 50 in comparison to the deeds of conveyance whereupon the stamp duty and registration fee are leviable at the rate of five and one *per cent* of the value of the properties. These instruments i.e. power of attorney were effectively the deeds of conveyance. Since the attorney holders were given the power to sell or transfer and hand over the possession of the properties to the third person, stamp duty and registration fee of ₹ 9.84 crore⁶ could have been levied and collected, had these instruments been registered as deeds of conveyance though passing of consideration was not mentioned.

⁴ Amritsar-I, Barnala, Banga, Bathinda, Jalandhar-I, Kapurthala, Kharar, Ludhiana (East), Mohali, Mansa, Moga, Nakodar, Payal, Phagwara, Patran and Ropar.

⁵ Two persons are said to be related to each other by full blood, when they are descendents from a common ancestor by the same wife {Section 3 (e) of the Hindu succession Act, 1956}.

⁶ Calculated by applying the Collector rates prescribed from time to time.

In an illustrative case of SR Moga, we found while scrutinising the records of deed writers that one person made an agreement of sale of land measuring 68 kanal 10 Marla on 26 February 2008 with a coloniser for a consideration of ₹ 5.99 crore and received the full consideration. This instrument i.e. agreement for sale was not got registered with the registering authority though the same was required to be registered under Article 5 (cc) of Schedule 1A (for Punjab) of the Indian Stamp Act, 1899. The seller instead executed and got registered another instrument of power of attorney on the same day (26 February 2008) authorising the purchaser to develop the land for all purposes or sell to any other person for consideration and get the land (in full or part) registered as deeds of conveyance.

The instrument of power of attorney was not stamped as required under Article 48(f) *ibid*, though it contained both the averments specified therein. Further, the deed writer did not submit or report to the registering authority about the instrument of agreement to sell as required under Article 5(cc) *ibid* as this instrument was evidencing the delivery of possession of the immovable property agreed to be sold and the receipt of full consideration. This instrument was compulsorily registerable.

In the above mentioned instrument of power of attorney, the attorney holder was given absolute powers to do all acts as an owner can do. It was specifically stated by the owner in the instrument that no sale transaction with the attorney holder had been done nor any consideration had been received. When we cross linked these instruments, it was proved beyond doubt that provisions related to the power of attorney were being misused resulting in loss of revenue to the State Government. We further observed that the attorney holder subsequently sold this property to other persons by undervaluing the property viz. the value of the property mentioned in the sale agreement was higher than the value disclosed in the sale deeds.

We found yet in another case of SR Moga that similar method had been adopted to evade the payment of stamp duty and registration fee.

Non-registration of the agreement to sell and registration of power of attorney in these two cases had resulted in short levy of stamp duty and registration fee of ₹ 1.06 crore.

The Government stated that the Power of Attorney Act is a Central Government Act, which does not provide issuance of any order or instructions to the effect as required by Audit and further stated that instructions already issued in December 2007 had been reiterated in August 2010. The reply is not acceptable to the extent that the Government has power to amend schedule 1-A (for Punjab) of the Indian Stamp Act to consider levy of stamp duty in cases of power of attorney, where the attorney holders were given powers to sell, receive consideration and hand over the possession of the immovable property.

In the context of large scale misuse of the provisions of power of attorney through this *modus operandi*, where the consideration received or possession handed over or both are not being mentioned in the instruments of power of attorney, it is recommended that such Powers of Attorney where power of sale of the immovable property is given to an Attorney Holder, other than a blood

relative, be treated as conveyance deeds for stamp duty purposes, by amendment to the Act/Rules governing stamp duty in the State. Such provisions have already been made in other States such as Rajasthan (Section 44 EE of Rajasthan Stamp Act). Further a nominal appropriate stamp duty may also be considered for such Powers of Attorney given to blood relatives.

5.6.6 Misclassification of sale instruments

Under Section 2 (10) of the Indian Stamp Act, 1899, 'Conveyance' includes a conveyance on sale and every instrument by which property, whether movable or immovable, is transferred is chargeable to duty as specified under Article 23 of the Schedule 1-A. The essence of conveyance is the transfer of property or interest therein, whether moveable or immoveable and the transfer is inferred from the language of the documents which may be in the form and guise of agreement or memorandum of agreement.

(a) We noticed that in three instruments of agreements registered in three SRs/JSRs⁷, the owners of the land entered into agreements with the developers to develop and construct residential/commercial buildings on the owner's land. In return, the owners were to receive sale proceeds of developed property as agreed. The developers were given the possession of the land through Irrevocable Power of Attorneys to develop and sell/lease/rent out the developed properties under the terms of agreements. The agreements contained all the ingredients of conveyance and thus were required to be stamped as per Article 23 of the Schedule 1-A. But the registering authorities classified these instruments as memorandum of agreements instead of the deeds of conveyance.

These mistakes of misclassification of the instruments as agreements instead of deeds of conveyance resulted in non-levy of stamp duty and registration fee amounting ₹ 1.07 crore.

The Government stated in respect of the SR Mohali that action would be taken as per decision of the collector, whereas in respect of SR Amritsar, the concerned SR had been directed to refer the matter to the competent authority.

(b) In five SR⁸ offices we noticed that nine instruments were executed for securing loans/cash credit limit from the scheduled banks as 'Memorandum of deposit of title deeds' and 'Power of Attorneys' against the security of immoveable properties.

⁷ Amritsar-I, Dera Bassi and Mohali.

⁸ Bathinda, Bholath, Kapurthala, Khanna and Phagwara.

❖ A 'mortgage deed' includes every instrument whereby, for the purpose of securing money advanced by way of loan, or an existing or future debt, one person transfers or creates in favour of another a right over or in respect of specified property

❖ For availing cash credit facility or taking loan from the Commercial and Banking Institutions, the instrument is required to be stamped as mortgage under Article 40 of Schedule-I-A of the Act.

These instruments were required to be classified as mortgage deeds without possession. Thus, the misclassification of these instruments resulted in short levy of stamp duty of ₹ 31.90 lakh.

When we pointed out the above mentioned mistakes, most of the registering authorities either stated that the documents were registered as per provision of the Act or the matter would be referred under section 47-A/48 for adjudication.

The Government stated that the concerned registering officers had been directed to effect recoveries under Section 48 of the Act.

5.6.7 Absence of provision for remission of the registration fee

❖ As per Section 78 of the Registration Act, 1908, registration fee is to be fixed by the State Government for the purposes enumerated in clauses (a) to (i). In case the State Government wants to remit the fees payable in respect of any of the matters enumerated in clauses (a) to (i), provision for the same is required to be made under Section 78 by an Act.

❖ In this context, the States of Kerala, Tamil Nadu and many others had inserted Section 78-A or 78-B or sub section 2 below sub section 1 of Section 78 providing for remission of fee.

The State Government had issued (June 2001) notification for remission of the registration fee leviable on instruments of mortgage for securing loan for agricultural purposes or purposes allied to it including machinery and building which is not used for commercial purposes.

We found that in the office of the 32 SRs/JSRs⁹ instruments of mortgage executed during the years 2007-08 and 2008-09 by the agriculturists were registered for securing loans from the banks/banking institutions. These instruments were registered without the levy of registration fee of ₹ 33.80 crore under the above mentioned notification. Remission of the fee under the notification was inappropriate as it was not governed by any provision in the Act.

When we pointed out in July 2010, the Government intimated in August 2010 that Section 21 of the General Clauses Act, 1897 (GC Act) empowered the State Government to add, amend, vary or rescind the table of fees.

⁹ Amritsar-I, Ajnala, Amlon, Bholath, Barnala, Baghapurana, Faridkot, Gurdaspur, Gidderbaha, Jalandhar-I, Khanna, Ludhiana (East), Moga, Mohali, Mukerian, Mullanpur, Nakodar, Nawanshahr, Patti, Patran, Payal, Phagwara, Phillaur, Ropar, Raikot, Sangrur, Samrala, Sultanpur Lodhi, Samana, Banga, Goraya and Kartarpur.

But we observed further that the Government had issued the notification remitting the levy of registration fee under Section 78 of the Registration Act which did not empower the Government to remit or exempt or reduce the fee. Moreover, there are no explicit provisions in the GC Act empowering the Government to remit the fee. Therefore, the Government may consider appropriate amendment in the Act providing for remission of fee, as has been done in some other States.

5.6.8 Non-verification of payment of stamp duty with the banks

With a view to curb the loss of revenue due to fraud and defalcation etc., the Government issued instructions (October 2005) for depositing of stamp duty of ₹ 20,000 or more involved in a single transaction at the authorised branches of State Bank of India. The scheme also provided for installation of internet connections between the banks and the registration offices for verification of the deposits on-line by the registration offices. The registering authorities were required to verify the deposits of stamp duty in the banks before release of the documents to the executants.

We found that no internet connection was installed in any of the 38 registering offices test checked and as such no verification of the deposits was done by the registering officers before the release of document to the executants. The registering authorities also failed to verify the payment details with the bank by other method and the routine method of reconciliation of remittances with the treasury. We observed that in the office of the SR, Hoshiarpur the non-verification of the deposits of stamp duty before the release of documents to the executants had led to acceptance of fraudulently tampered bank receipts resulting in loss of revenue of ₹ 42.60 lakh in 30 cases during the year 2008-09. The fraud was detected by the Department (August 2009). In all the 30 cases, the executants of instruments tampered the bank receipts in the following manners.

- by adding the digits one or two before the amount of duty actually deposited in the bank, or
- altering the digit of one as four in lakh position in the bank receipts.

Though the fraud was detected by the Department, yet no remedial measures were taken to provide internet facility in the registration offices for online verification of the stamp duty deposited in the banks. During the exit conference held on 31 August 2010, the Secretary Revenue stated that instructions were being issued for speedy installation of internet facility.

Government may, after examining the economical aspect, provide internet connection between the bank and the registering office to monitor the deposits of stamp duty in the bank before releasing the documents to the executants. Alternatively, the registering officers be instructed to release the documents only after they verify the deposits of stamp duty from the bank scrolls.

Compliance deficiencies

5.6.9 Remission of stamp duty and registration fee on incomplete documents

A few illustrations of inadmissible remission of stamp duty and registration fee of ₹ 20.59 crore are discussed below:

The Government of Punjab vide notification (June 2008) allowed remission of the stamp duty and registration fee on the instrument of conveyance that were to be executed or had already been executed by those whose land in the State had been acquired for the public purpose. The remission was to be limited to the amount which the owner of the land had received as compensation awarded by the Collector for the acquisition of the land.

(i) In 11 SRs/JSRs¹⁰, we noticed that the remission of ₹ 1.91 crore of stamp duty and registration fee was granted on 54 instruments executed by the beneficiaries on the basis of land acquisition notification etc. without obtaining the land acquisition certificates and details of compensation awarded by the Collectors. Thus, the document used for grant of remission in the above mentioned instruments was incomplete.

In the case of SRs Fatehgarh Sahib and Bagha Purana, we noticed that the remission of ₹ 9.22 lakh on three instruments was granted to the persons who were not covered under the land compensation awards as their land was not acquired for public purposes.

The Stamp Act provides that stamp duty is leviable at the prescribed rate on every instrument unless it is otherwise remitted by the State Government. Under the Industrial Policy on Mega Projects, the State Government on the recommendations of the Empowered Committee on Mega Projects grants exemption from levy of duty and issues specific notification in this regard.

(ii) In the office of three SRs¹¹, we noticed that the remissions of stamp duty and registration fee of ₹ 5.83 crore were granted to three beneficiaries who executed the instruments of conveyance for Mega Projects in anticipation of the exemption notifications. But no such notifications have so far been issued by the State Government.

The Government intimated (August 2010) that explanation had been called for from the registering authorities as to how they had allowed remissions without proper notifications.

¹⁰ Ajnala, Amlah, Fatehgarh Sahib, Giddarbaha, Kapurthala, Mansa, Mohali, Patti, Payal, Samana and Samrala.

¹¹ Barnala, Ludhiana (West) and Talwandi Sabo.

The Punjab Government (September 2006 and February 2007) remitted the stamp duty in respect of instruments of conveyance executed by the owners of Subsidiary Companies and Associate Companies in favour of their Promoter Companies dealing in Mega Housing Projects. The registering officers were to ensure that the factum of relation between the Promoter Companies and the Subsidiary/ Associate Companies was fully described in the instruments.

As per the Indian Stamp Act, 1899 (Schedule 1-A), a mortgage deed in respect of a specified property for securing loan, when possession is neither given nor agreed to be given, is chargeable to stamp duty at the rate of two *per cent* of the amount secured.

Government remitted (February 1981) stamp duty and registration fee chargeable on instruments of conveyance by sale or gift in favour of the charitable institutions for charitable purposes.

(iii) We noticed in three SRs¹² that the remission of stamp duty was granted on 48 instruments of conveyance executed by the companies claiming as Subsidiary/Associate Companies in favour of their Promoter Companies, but the factum of relationship between the Promoter Company and the Subsidiary/ Associate Company had not been described in the conveyance deeds. Thus, the remission of the stamp duty of ₹ 10.48 crore was granted without satisfying the condition prescribed in the notification.

When we pointed out, the Government issued instructions to the registering authorities to obtain the necessary certificates.

(iv) In the office of nine SRs/JSRs¹³, we noticed that the remission of stamp duty and registration fee of ₹ 14.48 lakh was granted on 26 instruments of mortgage executed in favour of the General Manager, District Industries Centers for securing subsidy by creating charge on the specified properties, when no notification for remission was issued by the Government.

(v) In the office of 13 SRs/JSRs¹⁴, we noticed that the remission of stamp duty and registration fee of ₹ 73.77 lakh was granted on 21 instruments of conveyance executed in favour of the charitable institutions, despite the fact that these institutions were not established under the Charitable Endowment Act, 1890. The Government instructions (August 2009)

directing the registering officers to ensure the charitable status of the institutions before the grant of remission of stamp duty and registration fee under the Act were not complied with.

¹² Bathinda, Jagraon and Mohali

¹³ Baghapurana, Bathinda, Faridkot, Kartarpur, Ludhiana (East), Moga, Payal, Samrala and Sangrur.

¹⁴ Barnala, Faridkot, Ferozepur, Giddarbaha, Jalandhar-I, Kapurthala, Khamano, Ludhiana, Majari, Mansa, Moga, Patiala and Sangrur.

Indian Stamp Act, 1899 provides that stamp duty and registration fee is leviable in respect of instruments of transfer of property in favour of Corporations/Boards/Bodies.

The Government (June 2001), exempted stamp duty and registration fee leviable on instruments executed by a person for securing loan from a bank, co-operative society or banking institution to meet the expenditure on any of the items specified in connection with agricultural purpose or purposes allied to it.

The Government (December 2001) remitted duty chargeable in case of transfer by an owner of agricultural and residential property to his class-I heirs. When class-I heir is alive, then stamp duty and registration fee is leviable in the case of transfer of property to class-II heirs.

As per the Indian Stamp Act 1899 (Section 3-C), additional stamp duty and registration fee is leviable in respect of instruments of transfer of properties located within the Municipality/outer limit of five kilometres of class-1 municipality and Municipal Corporation, as specified in Schedule 1 B.

(vi) We noticed in two SRs and JSRs¹⁵ that the remission of stamp duty and registration fee of ₹ 23.55 lakh was granted on two instruments of conveyance executed in favour of a Corporation of the Central Government despite the fact that no specific notification of such remissions was notified by the Government.

(vii) In the office of 22 SRs and JSRs¹⁶, we noticed that the remission of stamp duty and registration fee of ₹ 89.73 lakh was granted on 116 instruments of 'mortgage without possession' executed by individuals in order to secure loans from the Commercial/Banking institutions for the purpose of non farming activities or for purposes other than the items specified in the Government notification of June 2001.

(viii) We noticed in SR Ludhiana (East) and SR Sunam that the remission of stamp duty of ₹ 5.50 lakh was granted on instruments of transfer of property executed in favour of class-II heirs, when the class-I heirs were alive.

(ix) In the offices of four SRs¹⁷, we noticed that the remission of additional stamp duty of ₹ 20.78 lakh was granted erroneously on four instruments of transfer of properties located within the Municipality.

In respect of sub paragraphs 5.6.13(iv) to (ix), the Government agreed to take action under Section 47A/48.

¹⁵ Banga and Malerkotla.

¹⁶ Adampur, Ajnala, Amritsar, Banga, Barnala, Bathinda, Derabassi, Fazilka, Goindwal, Gurdaspur, Khamano, Kapurthala, Kartarpur, Ludhiana, Macchiwara, Mullanpur Dakhan, Nakodar, Phillaur, Samrala, Sangrur, Sultanpurlodhi, and Zira.

¹⁷ Bholath, Jalandhar-II, Mukerian and Samrala

5.6.10 Short levy of stamp duty

A few instances of short levy of duty of ₹ 4.37 crore due to non-adoption of the appropriate collector rates are discussed below:

Under the Punjab Stamp (Dealing of Under-valued instruments) Rules, 1983 as amended in 2002, the Collector of a district in consultation with the Committee of Experts as defined thereunder, fixes the minimum market value of land/properties locality wise and category wise in the district for the purpose of levying stamp duty.

(a) In all the 38 selected offices, we noticed that the immovable properties were misclassified in 60 instruments of transfer of properties registered during the years 2007-08 and 2008-09 as agricultural land instead of *ghair mumkin*¹⁸ residential and commercial or *ghair mumkin* residential instead of *ghair mumkin* commercial etc. as described in the *Jamabandi (ferds)*, *Khasra list* and *Khatauni*. The Collector's rates as applicable to those properties were not applied for levy of stamp duty. This omission resulted in short levy of stamp duty of ₹ 3.30 crore.

(b) In eight registering offices¹⁹, we noticed that the Collector's rates of valuation of the land as applicable to *ghair mumkin* land were not applied in 10 instruments for transfer of land upto two kanals/three kanals for levy of stamp duty and registration fee. This omission resulted in short levy of stamp duty and registration fee of ₹ 22.88 lakh.

(c) In the office of five SRs²⁰, we noticed that the Collector's rates of valuation of the land as applicable for those properties like *ghair mumkin*, commercial etc were not applied in six instruments of conveyance. These mistakes resulted in short levy of stamp duty and registration fee amounting to ₹ 37.95 lakh.

(d) In the office of SRs Gurdaspur and Sangrur, we noticed that the stamp duty on two instruments of transfer of immovable properties bought in auction held by the Punjab Urban Development Authority/Punjab Financial Corporation, was levied on the transaction value equivalent to the auction price of the land instead of the value to be worked out as per Collector's rates as applicable to those properties. These mistakes resulted in short levy of stamp duty and registration fee of ₹ 46.66 lakh.

5.6.11 Internal Control Mechanism

5.6.11.1 Internal audit

The system of internal audit was introduced in 1985 in the Revenue Department. The Internal Audit organisation (IAO) under the control of the Finance Department conducted audit up to April 2003 and thereafter discontinued. However, the Department in December 2008 decided to restart the internal audit

¹⁸ Ghair mumkin : land which has for any reason become uncultivable, or which is barren sand, or ravines.

¹⁹ Amritsar-I and II, Ludhiana (East), Mahilpur, Moga, Nawanshahr, Rajpura and Samrala.

²⁰ Bhikhiwind, Goraya, Jalandhar-I, Moga and Raikot.

from January 2009 and during the period January to March 2009 the IAO issued 884 audit paragraphs involving stamp duty and registration fee of ₹ 36.77 crore. As on 31 March 2009, 875 paragraphs involving ₹ 36.60 crore were outstanding for settlement by the Department. Non-settlement of the large number of internal audit objections has rendered the internal audit function ineffective and Government may therefore take appropriate steps in the matter.

5.6.11.2 Sale of stamp papers not found entered in vendor records

❖ Rule 35 of the Punjab Stamp Rules provides that every officer not below the rank of a tehsildar and any other Government servant including a stamp auditor may at any time inspect the stock of stamps, the registers, and the accounts of any licensed or specially licensed vendor.

❖ Note (1) below the Rule ibid provides that tehsildar/naib tehsildar shall exercise a general supervision over the stamp vendors in their tehsils, and are required to inspect the register and accounts of stamp vendors at least once in a quarter and generally to collect such information as will be useful to the Collectors in their administration of the stamp Department.

In the offices of three SRs/JSRs²¹, we cross verified the records of the stamp vendors with the records of the treasury officers and found that the prescribed control mechanisms were not performed by the designated officials as stated below:

- Nine stamp vendors had shown excess stock of 2,618 non-judicial stamp papers in their vend registers. The excess stock of stamp papers valued ₹ 45.98 lakh was in denominations of ₹ 100, ₹500, ₹ 1,000, ₹ 5,000, ₹ 10,000, ₹ 15,000, ₹ 20,000 and ₹ 25,000 and had not been issued by the treasury officers. The excess stock of stamp papers was sold by the vendors to the public. The stamps thus sold by the stamp vendors could be fake stamp papers, which needs to be investigated.
- Stamp papers valued ₹ 38.16 lakh purchased from the treasuries were neither found entered in the vend registers as stock in hand nor shown as sold to the public by seven stamp vendors.
- As per the Standing Instructions of the Punjab Government, Deed writers are required to record the details (name of the stamp vendor, serial number and date of issue and denomination and printed serial number) of stamp papers in the deeds.

²¹ Ludhiana, Machhiwara and Bathinda.

Para 5 of the questionnaire for the guidance of officers inspecting the registers and accounts of licensed stamp vendors provides that officers inspecting the registers and accounts of the stamp vendors have to ascertain whether the vendor correctly and truly enters in his register the supply of stamp papers received from the local treasury or sub treasury and strike the monthly balance of stock in hand in the register.

The particulars of stamp papers stated in the deeds are to be cross checked with the stamp vendor's registers to rule out the possibility of recycling of used stamp papers as well as of fake stamp papers. We noticed that in the office of S R Bathinda, details of stamp papers mentioned in eight instruments valuing ₹ 1.31 lakh were not traceable in the stamp vendors' register.

The Government stated (August 2010) that instructions had been issued for prevention of sale of fake stamps in the Punjab State and to check the records of stamp vendors regarding verification of sales by the stamp vendors with the treasuries. It was further stated that IAO was also entrusted in one case of such transactions in Ludhiana district and thus the State Government was seized of the matter. The Government reply does not sustain because despite these instructions, the sale of fake stamps were detected by Audit in the registering offices at Bathinda, Ludhiana and Machhiwara. This evidences that the prescribed control mechanisms were not complied by the designated officials and the sale of stamps by the treasuries were not matched/verified with the stamp vendor registers.

Government need to enforce the prescribed control mechanisms of verification of the stamp papers received by the stamp vendors with the treasury records and reconciliation of stamp papers mentioned in the instruments with the details contained in the vendors' registers.

5.6.11.3 Non-maintenance of the vend register

Under Rule 32 of the Punjab Stamp Rules, 1935, blank vend register in the prescribed form shall be supplied free of charge to the vendor on application to the Collector. Before issuing any blank vend register to the vendor, the Collector shall enter or cause to be entered the particulars such as (a) full name and residence of the vendor, (b) the date on which the register is issued and the pages of such register shall bear printed number, and all the pages of each register shall be printed in a continuous series. The officer in charge of the stamps shall certify under his signature at the beginning of each register the number of pages contained in it, and that they are numbered in a continuous series. To avoid accumulation of the filled or partially filled vend registers at the tehsil offices, they should be transferred at the close of the official year in which they have been deposited, to the district record room where they should be retained for a period of twelve years and then destroyed.

In the office of 36SRs/JSRs²², we noticed that the vend registers were not being supplied to the stamp vendors by the Collectors. Further, in the 36 SRs/JSRs, filled/used vend registers were not collected from the stamp vendors

When we requisitioned the vend registers for audit through the SR Samrala, one of the stamp vendors did not produce the vend registers and instead, submitted a copy of FIR lodged by him against the alleged loss of the registers. Thereafter, we requisitioned the vendor report of this particular stamp vendor for the period 2004-05 to 2008-09 available in the backup data of PRISM. When the data of PRISM given to us in CD was scrutinised, we observed that the data was tempered or was insufficient as evident from the following table.

Year	Total no of deeds registered during the year (Book-I, III & IV)	No of deeds as per information supplied in the CD (Book-I, III & IV)	Deficient information in the CD (Book-I, III & IV)
2007-08	3,706	2,042	1,664
2008-09	3,949	820	3,129

Thus, the data base was incomplete and the stamp vendors records could not be verified with the treasury records. The Department resultantly had failed to ensure correctness/completeness of the data.

²² Amritsar-I, Ajnala, Amlah, Bholath, Barnala, Baghapurana, Faridkot, Gurdaspur, Gidderbaha, Jalandhar-I, Jagraon, Kapurthala, Khanna, Mansa, Moga, Mohali, Mukerian, Nakodar, Nawanshahr, Patti, Patran, Payal, Phagwara, Phillaur, Ropar, Raikot, Sangrur, Samrala, Sultanpur Lodhi, Samana, Zira, Banga, Goraya, Kartarpur, Machhiwara and Mullanpur Dakha.

The Government of Punjab directed (March 2006) that the maximum value of stamp papers for sale by the stamp vendor in each registration case cannot exceed ₹ 50,000. We observed that in four SRs, stamp papers exceeding ₹ 50,000 had been issued by the stamp vendors in 2,111 cases²³ out of 19,806 cases.²⁴ There was no provision in the software (PRISM) to reject/alert the sale of stamp papers exceeding ₹ 50,000 by the stamp vendors.

The authorised stamp vendors are allotted registration numbers by the Deputy Commissioner of respective district for sale of stamp papers within the monetary limit fixed by the Government of Punjab. In order to identify the authorised stamp vendors, there is a provision in the software to input the code and details of the stamp vendor selling the stamp papers. In 14,173 cases²⁵ out of 14,691 cases²⁶, we found that the stamp vendor code was input as '099'/'others', thereby rendering the data incorrect/incomplete.

The Government (August 2010) agreed to the audit observations and issued instructions reiterating their earlier direction regarding maintenance of vendor register and inspection thereof.

5.6.12 Inadmissible refund of stamps

Under section 49 of the Indian Stamp Act, 1899, the Collector may on application made within the period prescribed, make allowances for stamp duty in certain laid down circumstances.

No provision has been made for allowances of stamp duty in cases of documents fully executed by the concerned parties. Further Section 53 (c) of the Act provides that the collector may at his discretion permit allowances for spoiled and misused stamps of the same value in money, deducting ten naye paisa for each rupee or fraction of a rupee of the stamp value.

We noticed that:

(a) Refund Registers were not maintained in the prescribed Form SR-I in all the SRs/JSRs test checked by Audit.

(b) In 27 SRs/JSRs²⁷ refunds of ₹ 1.32 crore were allowed in respect of 366 executed instruments duly signed by both the parties. The refunds were allowed on the ground and report of the registering authorities that the instruments were not registered under the Registration Act. Since the instruments were duly executed by both the parties, the refunds were not admissible and needed to be recovered.

²³ Ludhiana-East:727, Ludhiana-West:916, Ludhiana-Central:452 & Sangrur:16.

²⁴ Ludhiana-East:6275, Ludhiana-West:4501, Ludhiana-Central:3915 & Sangrur:5115.

²⁵ Ludhiana Central:3748, Ludhiana East:6116, Ludhiana West:4309.

²⁶ Ludhiana Central:3915, Ludhiana East:6275, Ludhiana West:4501.

²⁷ Ajnala, Baghapurana, Barnala, Bathinda, Faridkot, Gidderbaha, Gurdaspur, Jagraon, Jalandhar-I, Kapurthala, Khanna, Ludhiana (East), Ludhiana(West), Mansa, Moga, Nakodar, Nawanshahr, Patran, Patti, Payal, Phillaur, Raikot, Roper, Samrala, Sultanpur Lodhi, and Zira.

(c) In the SR Amloh refund of the stamps was made without deducting ten naye paisa per rupee of the stamp value in contravention of the Act. This resulted in excess refund of ₹ 1.50 lakh.

(d) In three collectorates²⁸ the records relating to the applications seeking refunds, reports of the stamp vendors and the registering authorities, sanction orders and refund vouchers were destroyed along with the spoiled stamps before completion of the prescribed preservation period of one complete financial year following the one in which they were sanctioned.

The Government agreed (August 2010) to furnish a detailed reply. But the same is awaited (October 2010)

5.6.13 Computerisation of the registration activities

The NIC maintained the software (PRISM) by providing technical support to the Department, but the same was withdrawn in August 2009 as the Department entrusted the work of development, implementation and integration of computerisation of land records with property registration to the Punjab Land Records Society (PLRS).

We noticed that the PRISM application was run by the Department as technical support from NIC was withdrawn since August 2009. No documented procedure for effective changes in the software was formulated and different versions of the software were being used including non-secured version in MS-Access. No IT policy, Back up policy and Password policy was formulated by the Department. These deficiencies were noticed as part

of transaction audit in seven SRs/JSRs²⁹, as the software was not reviewed by us in totality because it was a rudimentary type. Computerisation of registration integrating with the land records was being done by PLRS.

Some of the system deficiencies noticed in the computerisation (PRISM) of the registration activities are discussed below:

(a) Change management procedures

Though the software PRISM was developed by the NIC in 2000, the Department had not prepared a documented procedure to control changes in the software and impact analysis of changes. There were no documentation relating to testing of the changes made in the software from time to time. In the absence of any documentation for change control, it was not possible to ascertain the effectiveness of any procedures.

²⁸ Amritsar, Phagwara and Samana.

²⁹ Jalandhar-I, Jalandhar-II, Ludhiana (Central), Ludhiana (East), Ludhiana (West) Patiala and Sangrur.

(b) Failure to use the new version of PRISM

NIC, emphasising the security concerns, released new version of the PRISM 3.0 containing Relational Database Management System (RDBMS) in SQL in October 2001.

We noticed in three SRs³⁰ that the older version of the PRISM software in MS-Access database was continued to be in use in a standalone PC lacking adequate security features. In reply, the SRs Jalandhar-I and Jalandhar-II admitted (March 2010) that the new version PRISM 3.0 was not installed in their offices, whereas the SR Patiala stated (April 2010) that the matter would be brought to the notice of Deputy Commissioner.

(c) Results of analysis of data applications

We imported and analysed the PRISM data of four SRs³¹ and the analysis was carried out by using IDEA, a Computer Assited Audit Technique and cross verified with the manual records. The results thereof are given below:

SR, Patiala

The Government of Punjab notified in February 1981 that no fee shall be chargeable on instrument of sale or gift executed in favour of a charitable institution established for charitable purpose within the meaning of the Charitable Endowment Act, 1890 (Central Act of 1890).

(i) We observed that the provision to regulate the registration of instrument of transfer of immovable property in favour of charitable trust was not mapped in the software and resultantly the SR had to resort manually. In the instant case, though the beneficiary, Kartar Foundation, Mohali (a society registered under Societies Registration Act, 1860) did not qualify for such an exemption, the SR had wrongly allowed

exemption of stamp duty and registration fee of ₹ 4.10 lakh on the registration of the conveyance deed of a land valued at ₹ 50 lakh.

SRs, Ludhiana (East and West)

Stamp duty is charged on the instrument of lease on the basis of period of lease, amount of average annual rent reserved and on the value of fine, premium or money advanced in addition to rent reserved.

(ii) When analysed the data base, we observed that the provision to regulate the registration of instrument of lease on the basis of period of lease, amount of average annual rent reserved and the premium or money advanced in addition to the rent reserved was not mapped in the software leading to wrong calculation of stamp duty and registration fee in five

instruments. These mistakes resulted in short levy of ₹ 0.26 lakh and ₹ 0.18 lakh. Manual intervention had to be made to rectify these mistakes.

³⁰ Jalandhar-I, Jalandhar-II and Patiala.

³¹ Ludhiana (Central), Ludhiana (East), Ludhiana (West) and Sangrur.

SR, Ludhiana Central

(iii) We noticed that in 28 of the 36 instruments of lease registered between November 2008 and March 2009, the transaction value ranged between ₹ one and ₹ 53, whereas the corresponding stamp duty collected ranged between ₹ 242 and ₹ 2,65,918, implying data inaccuracy.

SR, Ludhiana West

- ❖ The additional stamp duty is leviable at the rate of three *per cent* of the transaction value. There is no concessional rate of additional stamp duty for females.
- ❖ The additional stamp duty is depositable in Social Security Fund maintained under the head 'Stamps and Registratio'.

(iv) When analysed the data base, we observed that the provision to regulate the registration of instrument of transfer of residential property registered in the name of females was not correctly mapped in the software and resultantly additional stamp duty was calculated by the software at the rate of two *per cent* instead of three *per cent* of the transaction value.

Due to these deficiencies, manual intervention had to be resorted to consolidate and reconcile the collection of additional stamp duty.

SRs, Jalandhar-I and II

The stamp duty is leviable at different rates of the transaction value for male, females and certain other categories.

for male, female and certain other categories. Manual intervention had to be resorted to rectify the mistakes.

A check has been designed in the software to ensure that the transaction value of the sale of property in the instrument is not less than its minimum market value fixed by the respective Collector of the district. In case, the transaction value mentioned in the instrument is less than the minimum market value, the system will alert for impounding and processing of the instrument under Section 47 A of the Act.

(v) We observed that the stamp duty was calculated by the software at a single rate for all instruments of transfer of immovable property instead of different rates of stamp duty prescribed

(vi) In three SR³² offices, we observed that in 32 of 15,598 instruments of sale of land, the transaction value therein was shown at the rate of 10 *per cent* of the minimum market value by the software as it had surpassed the designed check due to bugs in the software.

In an illustrative case of SR Ludhiana (West), we detected that stamp duty of ₹ 1.34 lakh was short levied in one instrument on account of this deficiency.

³² Ludhiana (East):13, Ludhiana (West):17 and Sangrur:2.

(d) Deployment of man power

We collected Information from the selected SRs/JSRs and observed that there was no rationale behind the deployment of staff viz-a-viz the number of instruments registered in a registering office. For instance, a very small number of instruments (2,700) were registered during the year 2008-09 by the SR Amloh as compared to those (29,095) by the SR Ludhiana (East). Similar scenario existed in the other registering offices too as can be seen below:

SRs where instruments less than 4,000 registered			
Sr. No.	Name of SR	Year	Total no. of instruments registered
1	SR Amloh	2008-09	2,700
2	SR Phillaur	-do-	3,176
3	SR Bholath	-do-	3,191
4	SR Samana	-do-	3,494
5	SR Payal	-do-	3,866
6	SR Samrala	-do-	3,949
7	SR Mukerian	-do-	3,990

SRs where instruments more than 20,000 registered			
Sr. No.	Name of SR	Year	Total no. of instruments registered
1	SR Ludhiana (East)	2008-09	29,095
2	SR Bathinda	-do-	20,141
3	SR Jalandhar I	-do-	28,261

We observed that the number of registering officials posted in the registering offices was the same irrespective of the number of the instruments registered during the year.

This had led to the mistakes/deficiencies like registration of undervalued instruments and remissions of stamp duty and registration fee in contravention of the Act, Rules and Government notifications/instructions. The audit had detected 3,161 cases of short levy of stamp duty and registration fee due to misclassification of the instruments and remissions, resulting in loss of revenue of ₹ 139.47 crore, as pointed out in the Reports of the Comptroller and Auditor General of India for the years ended 31 March 2006, 2007, 2008 and 2009 Revenue Receipts, Government of Punjab.

The Government may consider deployment of staff in accordance with the workload to ensure proper scrutiny of the instruments at the time of registration, after proper study on manpower planning.

(e) General controls deficiencies

The Department had not formulated and documented any policy on

- Security for IT assets, software and data security even after nine years of implementation of the PRISM. Further, no fire extinguishers were in place to keep the IT system safe in the event of fire. This endangers the security of IT assets and data base.
- Physical and logical access controls, business continuity and disaster management.

We observed in the SRs, Ludhiana (East) and Sangrur that as a result of general controls deficiencies, the entry of unauthorised persons in the server room was not restricted. Further, in all the selected registering offices, no arrangements for compulsory changing of password after a specified period was made in the software and the backups of data base were not also taken at uniform intervals.

The Government stated (August 2010) that the software PRISM was being disbanded and a new software was being developed. The use of new software would be started shortly.

5.6.14 Conclusion

Due to non-compliance of statutory provisions and Government instructions and lack of control over the registration activities, there were many cases of sale of fake stamps, inadmissible remissions of stamp duty and registration fee and evasion of duty through the instruments of general power of attorney, which resulted in loss of stamp duty and registration fee. Non-verification of payment of duty with banks in violation of Government instructions resulted in a fraud in Hoshiarpur district in 2008-09 involving loss of revenue of ₹ 42.60 lakh, detected by the Department. Internal Control Mechanism prescribed for vendor records was not followed by the Departmental officers. Non-settlement of large number of internal audit objections had rendered the internal audit function ineffective.

The NIC maintained software for registration activities, PRISM, had several general and applications control deficiencies, resulting in manual intervention.

5.6.15 Recommendations

Government may consider to:

- *Amendment to the Stamp Duty Act/Rules to prevent the misuse of power of attorney given for sale of immovable property, in line with provisions made by other states;*
- *provide internet facility between the banks and registering offices to prevent the sale of fake stamps, tampering etc.;*
- *enforce the system of verification of the stamp papers received by the vendors with the treasury records and reconciliation of the stamp papers mentioned in the instruments submitted for registration with the vendors accounts;*
- *amend the Section 78 of the Indian Registration Act, 1908 for inserting provision empowering the State to remit the stamp duty;*

- *expedite computerisation of the registration linking with the land records and replace the existing application of PRISM, which is rudimentary, insecure and incomplete in its coverage and utility; and*
- *deployment of staff in accordance with the workload to ensure proper scrutiny of the instruments at the time of registration, after proper study on manpower planning.*

Chandigarh:
The

(S.MURUGIAH)
Principal Accountant General (Audit), Punjab

Countersigned

New Delhi:
The

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Comptroller and Auditor General of India