Government of Pakistan
Revenue Division
Federal Board of Revenue
***

Islamabad, the 18th November, 2026.

NOTIFICATION

S.R.O. 2134 (I)/2026.— In exercise of the powers conferred by sub-section (1) of section 50 of the Sales Tax Act, 1990 (III of 1990), read with sections 30AA, 32C, 45B, 45C, 50A and 56 thereof, and sub-section (1) of section 40 of the Federal Excise Act, 2005, read with section 33 and 7A thereof, the Federal Board of Revenue is pleased to direct that the following further amendments shall be made in the Sales Tax Rules, 2006, namely:—

In the aforesaid Rules, after Chapter XIV-C, the following new Chapter XIV-CA shall be inserted, namely:—

"CHAPTER XIV-CA

FACELESS APPEALS

150ZZGB. Application and commencement.— (1) The provisions of this Chapter shall apply to appeals under section 45B of the Sales Tax Act, 1990 hereinafter referred to as the "said Act" and under section 33 of the Federal Excise Act, 2005, which are processed through the National faceless centre hereinafter referred to as the "Centre" under section 45C of the said Act, namely:—

(a) appeals against orders passed by an officer of Inland Revenue appointed in the Centre; and

(b) appeals against orders passed by any other officer of Inland Revenue in respect of such persons, classes of persons, orders or classes of orders as the Board may, by notification in the official Gazette, specify.

(2) This Chapter shall come into force on such date as the Board may, by notification in the official Gazette, specify, and different dates may be specified for different classes of appeals.

(3) An appeal pending before a Commissioner (Appeals) on the date on which this Chapter becomes applicable to it shall continue to be heard and decided by that Commissioner (Appeals), unless the Board, by order, directs its transfer to the Centre, in which case the record shall be transferred electronically and the proceedings shall continue from the stage at which they stood on the date of transfer.

(4) Nothing in this Chapter shall affect the option of a registered person under the second proviso to sub-section (1) of section 45B of the said Act or the corresponding provision of

section 33 of the Federal Excise Act, 2005, as the case may be, to file an appeal directly before the Appellate Tribunal.

150ZZGC. Definitions.— (1) In this Chapter, unless there is anything repugnant in the subject or context,—

(a) "Appellate Unit" means a unit of the Appeals Wing of the Centre in the charge of a Commissioner Inland Revenue (Appeals) appointed in the Centre under sub-section (2) of section 32C of the said Act;

(b) "e-portal" or "system" means the Iris web portal or any designated automated system maintained by the Board for electronic filing, communication, and processing of faceless appeals;

(c) "National Faceless Centre" means the faceless centre established under section 32C of the said Act; and

(d) "respondent" means the Commissioner specified in rule 150ZZGG and includes the officer designated by him under that rule.

(2) In relation to federal excise, a reference in this Chapter to a provision of the said Act shall be construed as a reference to the corresponding provision of the Federal Excise Act, 2005.

150ZZGD. Appeals Wing.— (1) There shall be an Appeals Wing in the Centre comprising as many Appellate Units as the Board may deem fit, and each Appellate Unit shall be in the charge of a Commissioner Inland Revenue (Appeals).

(2) The Appeals Wing shall work under the administrative control of the Member (Legal) Inland Revenue of the Board. The Director General, the Chief Commissioner or any other officer of the Centre shall not exercise any control over, or give any direction to, a Commissioner (Appeals) in respect of the hearing or decision of an appeal.

(3) An appeal shall be heard and decided by the Commissioner (Appeals) in charge of the Appellate Unit to which it is allocated.

(4) No officer who has performed the audit, assessment or quality control function in a case, or who has passed the order appealed against, shall hear or decide the appeal against that order.

(5) An order passed under this Chapter shall not be subject to quality control review under Chapter VIAC.

(6) Where a Commissioner (Appeals) has any personal or financial interest in, or connection with, the appellant or the case allocated to him, he shall record a declaration to that effect in the system and shall not hear the appeal, and the appeal shall be re-allocated under rule 150ZZGF.

150ZZGE. Electronic Filing and Allocation of Appeals.— (1) An appeal under section 45B shall be filed electronically through the Board's e-portal.

(2) Upon successful electronic filing, the system or the Centre shall automatically assign a unique appeal number and allocate the appeal to an Appellate Unit or Commissioner (Appeals) on a random, dynamic, and automated allocation basis through an algorithm designed by the Board under sub-section (3) of section 32C of the Act, and every allocation shall be logged in the system.

(3) The identity of the Appellate Unit and of the Commissioner (Appeals) handling the appeal shall remain anonymous and recorded in the system but shall not be disclosed to the appellant, his authorized representative and the respondent at any stage, including in the order passed in appeal, as provided under sub-section (5) of section 30AA of the said Act.

(4) The appeal shall be transmitted electronically to the respondent through the system upon its allocation.

150ZZGF. Re-allocation and Transfer of Appeals.— (1) The Board or the Centre may, through the algorithm referred to in sub-rule (2) of rule 150ZZGE, transfer or re-allocate any pending appeal from one Appellate Unit to another to ensure optimal workload distribution, efficiency, and impartiality, or where sub-rule (6) of rule 150ZZGD applies:

Provided that after the hearing of an appeal has commenced, it shall not be transferred or re-allocated except for reasons to be recorded in writing, and where it is so transferred or re-allocated, the appellant shall, on request, be heard afresh.

(2) Every transfer or re-allocation shall be logged in the system with reasons, and shall not affect the computation of the periods specified in the provisos to sub-section (2) of section 45B of the said Act.

150ZZGG. Respondent and representation.— (1) In an appeal against an order passed by an officer of Inland Revenue appointed in the Centre, the Commissioner of the Wing in which the order was passed shall be the respondent, and he may designate an officer of that Wing, other than the officer who passed the order, to represent him in the appeal.

(2) In any other appeal, the Commissioner having jurisdiction over the appellant under section 30 of the said Act shall be the respondent.

(3) Where the Commissioner (Appeals) requires parawise comments, the respondent shall upload them through the system within seven days of the requisition or within such other period as the Commissioner (Appeals) may allow.

150ZZGH. Procedure in Faceless Hearing and Submissions.— (1) All notices, requisitions, written submissions, arguments, rejoinders, and evidence shall be issued, served, and filed exclusively in electronic form through the e-portal.

(2) The appellant, the respondent and their authorized representatives shall not appear in person before the Commissioner (Appeals), and the hearing shall be held only through e-hearing under rule 150ZZGJ.

(3) The Commissioner (Appeals) shall examine the grounds of appeal, impugned order, written submissions, and electronic record available on the system.

(4) Where any document is required to be produced in original, it shall be uploaded as a scanned copy verified in the manner specified by the Board, and the Commissioner (Appeals) may, for reasons to be recorded in writing, require the original to be produced before a unit of the Field Operations Wing, which shall verify it and upload its report.

(5) An application for admission of an appeal after the expiry of thirty days under the first proviso to sub-section (1) of section 45B of the said Act, or for admission of documentary material or evidence under sub-section (5) of said section, shall be filed through the e-portal and decided electronically.

(6) Where the Commissioner (Appeals) makes further inquiry under sub-section (3) of section 45B of the said Act, the requisition shall be sent to the respondent through the system, and the respondent shall upload the report within the time specified; and where physical verification is required, it shall be carried out through the Field Operations Wing. Nothing in this sub-rule shall authorise remand of a case for de novo consideration.

150ZZGI. Stay applications.— (1) An application for stay of recovery under sub-section (1C) of section 45B of the said Act shall be filed through the e-portal, and the system shall fix it for e-hearing not later than the second working day after its receipt and notify the respondent at the same time.

(2) The Commissioner (Appeals) shall hear the respondent through e-hearing before deciding the application, and shall decide it electronically within seven working days of its fixation.

(3) An order on a stay application shall be communicated through the system to the appellant, the respondent and the Field Operations Wing on the day it is passed.

150ZZGJ. E-Hearing through Video Conferencing.— (1) In every appeal, notice of the date and time of hearing shall be issued to the appellant and the respondent through the system so as to give both parties an opportunity of being heard under sub-section (2) of section 45B of the said Act, and an e-hearing shall be conducted strictly through video-conferencing facilities provided by the Board or through secure digital communication links:

Provided that the appellant may, through the e-portal, opt to have the appeal decided on the basis of written submissions, in which case the respondent shall be given an opportunity to file written comments and the appellant shall have a right of reply.

(2) During an e-hearing, the face of the Commissioner (Appeals) shall not be shown and his voice shall be modulated so that his identity is not disclosed.

(3) E-hearings shall be conducted through the computerised system provided under section 50A of the said Act, in accordance with the technical standard operating procedures specified by the Board.

(4) Proceedings of all e-hearings shall be recorded and archived digitally in the e-portal and shall form part of the electronic record of the appeal.

(5) An appellant who does not have access to the internet may request, through the e-portal or at a unit of the Field Operations Wing, to attend the e-hearing from the e-hearing room of the nearest unit of the Field Operations Wing, and that unit shall facilitate the appellant on the date and time fixed.

150ZZGK. Digital Authentication and Issuance of Orders.— (1) Every order, decision, direction, or notice issued under this Chapter shall be generated on the Board's computerised system, bear a Digital Identification Number (DIN) and be authenticated electronically through the system without the name, designation or signature of the Commissioner (Appeals).

(2) Upon finalization of the decision, the order passed under section 45B shall be uploaded on the e-portal and communicated electronically to the appellant, the respondent Commissioner, and the Field Operations Wing simultaneously.

(3) An order issued and served under sub-rule (2) shall be treated as properly served if sent to the e-folder of the appellant maintained in the system, which shall be service under clause (d) of sub-section (1) or, as the case may be, clause (d) of sub-section (2) of section 56 of the said Act.

(4) An order passed under this Chapter shall be identified by its appeal number and DIN, which shall be stated in an appeal to the Appellate Tribunal under section 46 of the said Act In place of the name of the Commissioner (Appeals).

(5) A mistake apparent from the record in an order passed under this Chapter shall be rectified under section 57 of the said Act by the Appellate Unit through the system.

150ZZGL. Application of other rules.— Subject to this Chapter, the provisions of Chapter XIV-C and Chapter X of the Federal Excise Rules, 2005, shall apply to appeals to which this Chapter applies, and in case of any inconsistency, the provisions of this Chapter shall prevail.

150ZZGM. Failure of the system.— Where an appeal, application or reply could not be filed within time because the e-portal was not available owing to a technical failure confirmed by the Board, such failure shall be treated as sufficient cause for the purposes of the first proviso to sub-section (1) of section 45B of the said Act.

150ZZGN. Power to issue instructions.— The Board may issue instructions, standard operating procedures and formats for the implementation of this Chapter, not inconsistent with the said Act, the Federal Excise Act, 2005 and these rules."

[C. No. 3(95) ST FE Policy / 2026]

(Izhar Zuberi)
Second Secretary (ST&FE Policy)