

MINISTRY OF FINANCE
(Department of Revenue)
(CENTRAL BOARD OF DIRECT TAXES)
NOTIFICATION

New Delhi, the 15th December, 2025

S.O. 5779(E).— In exercise of the powers conferred by clause (46) of section 10 of the Income-tax Act, 1961 (43 of 1961), the Central Government hereby notifies for the purposes of the said clause, ‘New Okhla Industrial Development Authority’ (PAN- AAALN0120A), an authority constituted by the State Government of Uttar Pradesh, in respect of the following specified income arising to that Commission, namely:-

- i) Grants received from the State Government;
- ii) Money received from the disposal of land, building, and other properties, movable and immovable;
- iii) Money received by the way of renting the building, and other properties, movable and immovable;
- iv) The amount of interest and dividend earned; and
- v) All fees, tolls and charges received by the authority under the Uttar Pradesh Industrial Area Development Act, 1976;

2. This notification shall be effective subject to the conditions that ‘New Okhla Industrial Development Authority,-

- (a) shall not engage in any commercial activity;
- (b) activities and the nature of the specified income shall remain unchanged throughout the financial years; and
- (c) Shall file return of income in accordance with the provision of clause (g) of sub-section (4C) of section 139 of the Income-tax Act, 1961.

3. This notification shall be deemed to have been applied for the period of assessment years 2012-2013, 2013-2014, 2014-2015, 2015-2016 and shall apply with respect to the financial years 2011-2012, 2012-2013, 2013-2014 and 2014-2015.

[Notification No. 171 /2025/F. No. 196/83/2024-ITA-I]

HARDEV SINGH, Under Secy.

Explanatory Memorandum

It is certified that no person is being adversely affected by giving retrospective effect to this notification. The notification in compliance of decision dated 11.07.2024 of Hon'ble Delhi High Court in W.P.(C) No. 4711/2021.