



THE INSTITUTE OF
Company Secretaries of India

भारतीय कम्पनी सचिव संस्थान

IN PURSUIT OF PROFESSIONAL EXCELLENCE

Statutory body under an Act of Parliament

(Under the jurisdiction of Ministry of Corporate Affairs)

G/C

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July 19, 2024

Shri Manoj Govil, IAS
Secretary
Ministry of Corporate Affairs
Government of India
Shastri Bhawan
New Delhi -110001

**Subject: Functioning of MCA- 21 V3 Portal – Issues and Challenges facing stakeholders
– Reg.**

Respected Sir,

This has reference to the transition of the compliance operations of the Ministry of Corporate Affairs from MCA-21 V2 to MCA-21 V3 platform in an attempt to embrace digital transformation and furtherance of the agenda of the Government of India's efforts to promote Ease of Doing Business (EODB) for the India Inc. An integral part of this transition has been the alteration in the filling, filing and processing of e-forms filed under the Companies Act, 2013 and the Limited Liability Partnership Act, 2008.

At the outset, as we commend the efforts of the Ministry to make the transition as smooth as possible – all in a phased manner; akin to every new initiative, issues and challenges are bound to creep in. We at the Institute of Company Secretaries of India are happy to partner with the Ministry in sharing these issues of the stakeholders as well as providing support wherever possible.

In this regard, we wish to bring to your kind notice that certain issues are being faced by the stakeholders while engaging with the MCA21-V3 platform for the purpose of filing of forms for their companies and clients. Some of these issues/concerns/ technical glitches are placed below for your kind consideration and timely resolution:

SPECIFIC FORM RELATED ISSUES

Form	Purpose	Issues / Challenges
DIR-3 KYC and DIR-3 Web KYC	Verify Director's KYC details	Difficulty in generating OTPs in case of foreign nationals leading to non-compliance
PAS-3	Return of Allotment of Securities	<ul style="list-style-type: none">Incorrect Prefilled data: During the filling of form users are facing issue where details are incorrect in prefilled data and even the amount of authorized capital being shown is incorrect.

Vision

"To be a global leader in promoting good corporate governance"

Motto

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Mission

"To develop high calibre professionals facilitating good corporate governance"

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		<ul style="list-style-type: none"> • Unable to Save and Submit: Users are unable to complete the filing process when at the last moment error occurs: "Validation Error: Submission Restricted". • Master Data not updated on Approval: After processing and submission of Form PAS-3, even where the Forms are approved, the same is not reflected in the MCA master data.
INC-24	Application for approval of Central Government for change of name	<ul style="list-style-type: none"> • Unable to save and submit the Form: MCA System is not allowing to proceed further to save Form and affix DSC. Error occurs during 'Save and Submit'. • Incorrect prefilled data: Upon inserting SRN of approved RUN form - data of some other company is being pre-filled or is incorrect. • Error during re-submission: Users are unable to process and resubmit the Form as error occurs for "RUN SRN has expired (name validity)" despite filing the form within the given Timeline.
CHG-1	Application for registration of creation, modification (other than those related to debentures) including particulars of modification of charge by Asset Reconstruction Company in terms of SARFAESI, 2002	<p>Unable to Recognise Registered DSC: Even while DSC is well registered with the particular DIN, upon submission of the Form after affixing the DSC following error is occurring :</p> <ul style="list-style-type: none"> • "DSC is not registered with particular DIN on MCA Portal"

COMMON ISSUES AND CHALLENGES

Login Issue:	<ul style="list-style-type: none"> • Unable to reset password: Taking the route of 'Forgot Password' where a user tries to continue by clicking on "Proceed Button" the following error message appears : "Something went wrong. Please try again later". • Profile not updated: Wherein professionals are adding their current role in the User profile the same is not updated and old role is visible in the user ID.
Unmasking/unhiding particulars of form till it is filed and submitted:	<ul style="list-style-type: none"> • In forms like DIR-12, DIR-3, DIR-3 KYC etc., few details in forms are filled and become masked/or hidden during the submission process itself • This makes it impossible to verify the said particulars before filling. • Acceptance and Confirmation is being asked for users' details which have been marked with asterisks • It is requested to mask/hide details only after filling or submission of the form.



Time bound Approval of Forms	<ul style="list-style-type: none">• For the purpose of compliance of certain provisions and filling of forms appurtenant thereto, prior approvals of other forms is required. Such forms may not be approved even after 30 days which is usually the period within which the next form is required to be filed.• It is requested to kindly advise upon time bound approval of Forms.
Minimise use of Captcha	<ul style="list-style-type: none">• In order to view basic company Master Data on MCA portal, captcha is required to be provided 4 times, which takes unnecessary time of the user.• It is suggested to minimise the use of captcha while using the MCA website.
Option to Save data of Forms may be provided	<ul style="list-style-type: none">• Various E-forms may not be completed in one go and require multiple revisits for filling of information.• In such a situation, it becomes difficult for the professional to go back and forth with the directors or promoters of the Company to take OTP sent to them.• It is suggested to make provisions to save the data on the first OTP compliance and to process further without having to re-fill same details in the Form.
Resubmission date to be made available	<ul style="list-style-type: none">• In case of forms requiring resubmission, the date of resubmission may be mentioned in the remark column.• Also, issues have been faced where Resubmission remarks are not visible.

In light of the ultimate goal of simplifying procedural requirements and make the nation business ready, we request you to kindly consider the aforesaid practical difficulties and provide for their early resolution.

We shall be pleased to provide any further information or clarification in this regard on hearing from your good self.

Thanking You,

Yours faithfully

(CS B. Narasimhan)

President

The Institute of Company Secretaries of India