



REAL ESTATE

# From Construction to Compliance: CG-RERA's New Directive for Promoters Holding Completion Certificates

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## Introduction

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The Chhattisgarh Real Estate Regulatory Authority (CG-RERA) by way of Circular No. 146: RERA/870/2026 dated 02 March 2026, issued binding directions under Section 37 of the Real Estate (Regulation and Development) Act, 2016, mandating compliance by promoters who have obtained a Completion Certificate (CC) on or before 31 March 2024. This circular represents a significant exercise of the Authority's regulatory powers and introduces a structured framework for the post-completion recording and verification of registered real estate projects in the State of Chhattisgarh.

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## Background and Regulatory Context

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The Real Estate (Regulation and Development) Act, 2016 was enacted to bring accountability and transparency to the real estate sector. In furtherance of these objectives, CG-RERA has, from time to time, issued regulatory circulars to ensure that project records remain accurate and reflective of ground realities. Circular No. 146 is a continuation of this regulatory endeavour, specifically targeting promoters whose projects have reached completion but whose post-registration records may not have been duly updated with the Authority.

The circular derives its authority from Section 37 of the Act, which empowers the Authority to issue directions to promoters, allottees or real estate agents as it may deem necessary from time to time. The issuance of such directions is consonant with the Act's overarching mandate to protect the interests of allottees and ensure systemic integrity of the regulatory framework.

## Applicability and Operative Date

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The circular is applicable exclusively to promoters whose projects are duly registered with CG-RERA and who have obtained a valid Completion Certificate from the Competent Authority on or before 31 March 2024. Promoters falling outside this temporal threshold are not governed by this specific circular. The online submission portal through which compliance must be effectuated was made operational with effect from 03 March 2026 and all submissions are required to be made through the official CG-RERA website.

## The Two-Tier Compliance Framework

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One of the most significant aspects of Circular No. 146 is its introduction of a differentiated compliance regime based on the chronological relationship between the date of RERA registration and the date of receipt of the Completion Certificate. This distinction carries material consequences in terms of documentary obligations and penal liability.

In the first category, projects that were registered with CG-RERA after having already obtained the Completion Certificate from the Competent Authority are required to submit only a copy of the said Completion Certificate. Given that such projects were completed prior to registration, the Authority has not imposed any penal liability upon this class of promoters, recognising that the Act's disclosure requirements could not have been violated prospectively.

In the second category, projects that were first registered under the Act and subsequently obtained the Completion Certificate are subject to a more onerous compliance burden. Such promoters are required to submit not only the Completion Certificate but also Annexure-20 along with a duly executed Affidavit cum Consent. Additionally, such promoters are liable to face penalties for violation of Section 11 and Section 4(2)(l)(D) of the Act. These provisions pertain, respectively, to the general obligations of

promoters and the duty to obtain consent of allottees, underscoring the Authority's concern that post-registration project activities may not have been conducted in full conformity with the statutory framework.

Sr. No.	When Completion Certificate (CC) was Obtained	Documents to be Submitted	Penalty Applicability
1	Projects registered <b>after</b> obtaining CC from Competent Authority (CC obtained <b>prior to</b> RERA registration)	Completion Certificate only	<b>Not applicable</b>
2	Registered projects where CC was obtained <b>after</b> RERA registration	Completion Certificate Annexure- 20 Affidavit cum Consent	<b>Applicable</b> – Penalty shall be imposed for violation of Section 11 and Section 42(1)(d) of the Act

Table 1: Two-Tier Compliance Framework under CG-RERA Circular No. 146 dated 02 March 2026

## Documentary Requirements and the Affidavit cum Consent

All submissions under the circular must be made through the prescribed Application Form, duly filled, signed, and sealed by the authorised signatory of the promoter entity. The enclosed Affidavit cum Consent is a critical instrument requiring the promoter to solemnly declare, *inter alia*, that the project stands completed in all respects as per the approved layout plan, that there are no deviations between the registered and the completed structure, and that no further expansion has been undertaken post receipt of the Completion Certificate. Where deviations exist, a brief note with supporting details is mandatorily required.

Notably, clause 8 of the Affidavit requires the promoter to expressly accept the imposition of any penalty without contest and undertake to discharge the same in accordance with the scheme guidelines. This represents a pre-emptive waiver of challenge to the quantum of penalty, which practitioners advising promoters must carefully evaluate before recommending execution of the affidavit.

## Verification Process and Legal Effect of Compliance

Upon receipt of submissions, the Authority shall undertake a verification of the Completion Certificate and ancillary documents. If the Authority is satisfied with the submissions, the concerned project shall be officially classified as a “Completed Project” in the RERA register. This designation carries regulatory significance as it closes the active compliance cycle for a project and updates the public record maintained by the Authority. Conversely, any discrepancy discovered during verification shall expose the promoter to penal action under the applicable provisions of the Act.

## Conclusion and Advisory Note

CG-RERA Circular No. 146 of 2026 is a calibrated regulatory measure aimed at ensuring that post-registration records of completed projects are accurate, transparent and legally conclusive. Promoters to whom this circular applies are strongly advised to ascertain the category under which they fall, compile the requisite documentation without delay. Review the Affidavit cum Consent before execution, particularly in light of the penalty waiver clause therein. Failure to comply within the stipulated timeline may expose promoters to heightened regulatory scrutiny and financial liability under the Act.

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