Assistant Commissioner, Central Tax, Division-IV, CGST, Pune-II Commissionerate (Appellant). Respondent: Lions Club Of Poona Kothrud, GSTIN 27180000726ARI/URD

Appellate Authority for Advance Ruling — Maharashtra

AMENDED ORDER NO. MAH/AAAR/SS-RJ/32A/2018-19, dated 14.08.201… Dated **14.08.2019**

Q Questions Before the Authority

- Whether the entrance fee and annual membership fee collected by the Lions Club from its members is consideration for a supply of services under Section 2(31) of the CGST Act, 2017.
- Whether the Club's activity of organising leadership and skill-development programmes exclusively for Lion members is a service under Section 2(102) of the CGST Act, 2017.
- Whether the Club, by reason of organising such training programmes and workshops for its members, is liable to register under the GST law.

F Facts

Lions Club of Poona Kothrud, a body of individuals, collects an entrance fee and an annual membership fee from its members. It also organises leadership, communication, management and similar skill workshops for members, charging a separate registration fee for each. The original AAAR order dated 23.04.2019 treated the membership fee as consideration for these workshops, and the Club then sought amendment, relying on a Declaration of Body of Individuals dated 27.02.2019 and expenditure heads showing the fee is spent on administration.

H Ruling

Whether the entrance and annual membership fee is consideration for a supply	****No.** Not leviable to GST.**	The original order's contrary finding in paragraph 19 is amended. The conclusion rests on the BOI declaration (clauses 7 to 9) and the expenditure heads for club and cabinet membership fees, which show the fee is not appropriated towards workshops.
Whether the registration fee for leadership and skill workshops is consideration for a supply to members	****Yes.** Leviable to GST.**	Treated as consideration against the supply of workshops to members. The order fixes no rate and no HSN code.
Whether the Club must take GST registration for its workshop activity	**Yes, liable to take registration.**	Stated as an ancillary direction in the operative ORDER paragraph. The order does not decide the turnover threshold, which the Club had raised in its submissions.

The Authority amended paragraph 19 of the original order and held that the membership fee collected from members is not consideration for a supply and is not leviable to GST. It held that the registration fee charged for participation in skill-oriented workshops is consideration for a supply made to members and is leviable to GST. The Club was held liable to take registration for discharging its GST liability on the workshop activity.

Prepared as a reading aid. Where this summary and the original order differ, the order governs.

R Reasoning

The Authority revisited its earlier finding after the Club's submissions of 12.06.2019 and concluded that the earlier treatment of the membership fee as consideration was a mistake apparent on the record. It relied on the definition of consideration in Section 2(31), which requires a payment made in response to or for the inducement of a supply. The membership fee was found to be spent on administrative and meeting expenses under the BOI declaration, and no cogent evidence linked it to the workshops. The separate registration fees, supported by payment receipts and flyers showing fees per programme, were held to be consideration for the workshop services under Section 2(102). The amendment was made under Section 102 of the CGST Act, 2017.

P Provisions Relied On

- Section 2(31) of the CGST Act, 2017 (definition of consideration)
- Section 2(102) of the CGST Act, 2017 (definition of services)
- Section 102 of the CGST Act, 2017 (power to amend an advance ruling order)
- Section 99 of the CGST Act, 2017 (constitution of the Authority), referred to in the heading
- Section 100 of the CGST Act, 2017 (appeal), referred to in the background
- Corresponding provisions of the Maharashtra GST Act, 2017, which the order treats as identical in substance

! For the Practitioner

This order is useful for clubs and bodies of individuals that charge both general membership dues and separate programme fees. It shows that a membership fee spent on administration and supported by a constitutional declaration may fall outside the consideration for taxable services, while separately charged workshop fees are taxable. It does not decide the applicable rate, HSN classification, or the aggregate turnover threshold for registration. It also does not address the position where membership fees are used to fund member benefits.

Source

Summary prepared from the published order, which is a scanned document. It is a reading aid and not the authority: where the two differ, the order governs. Verify every provision against the original before relying on it.

Original order: www.gstcouncil.gov.in -> mah_aaar_32a_2018-19_lc.pdf

Prepared 06-11-2026.

About Patron Accounting LLP

Patron Accounting LLP is a CA and CS-led accounting and compliance firm working with businesses across India since 2019 — bookkeeping, GST, income tax, payroll, company and LLP compliance, audit and the certificates banks and regulators ask for.

Pune (HQ)
RTC Silver, B4-708, Sai Satyam Park, Wagholi, Pune, Maharashtra 412207

Mumbai
104, Rajshila Building, 597 J.S.S. Road, Marine Lines, Mumbai 400002

Delhi
3rd Floor, B-6/154-155, Sector 5, Rohini, Delhi 110085

Gurugram
Pioneer Urban Square, B109, Golf Course Ext Road, Sector 62, Gurugram…

Ahmedabad
Phoenix Tower, 1107, near Commerce Six Road, Drive In Road, Navrangp…

Talk to us: **+91 94594 56700** | sales@patronaccounting.com | patronaccounting.com

Patron Accounting LLP