

M/s. LINK UP TEXTILES PRIVATE LIMITED

Appellate Authority for Advance Ruling — Tamil Nadu

Order-in-Appeal No. AAAR/ 03/2026 (AR) Dated: 09.03.2026

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Q Questions Before the Authority

- What is the applicable GST rate on such men's Pyjama sets which are packed in 2 sets as per their buyers instruction and such packed Pyjama sets costs more than Rs. 1000

F Facts

The appellant is engaged in exporting men's nightwear Pyjama sets, each consisting of a top and a bottom. They pack two such sets together in a single pack per buyer instructions, with the total price of the pack being Rs. 1,371. The appellant contended that the pack should be treated as a single retail unit, making the value per unit exceed Rs. 1,000 and thus subject to a higher GST rate.

H Ruling

Applicable GST rate for 2-set pack

5% (CGST-2.5% +
SGST-2.5%)

Classified under Schedule I, S.No. 223 of Notification No. 1/2017-Central Tax (Rate) as the value per set is less than Rs. 1,000

The Appellate Authority upheld the original ruling, determining that the 'piece' for tax classification refers to an individual pyjama set. Since the price of one pyjama set within the two-set pack is only Rs. 686, it falls below the Rs. 1,000 threshold. Consequently, the goods are subject to the lower GST rate applicable to items not exceeding Rs. 1,000.

R Reasoning

The authority reasoned that the determination of tax is based on the 'cost per piece', and a 'piece' is defined as a single, independently usable apparel item. It rejected the appellant's argument that the entire two-set pack constitutes a single retail unit for valuation purposes. The ruling relied on the interpretation of Notification No. 1/2017-Central Tax (Rate) dated 28.06.2017, which distinguishes tax rates based on whether the sale value per piece exceeds Rs. 1,000. It further noted that the price of one pyjama set is Rs. 686, which is below the threshold.

P Provisions Relied On

Section 100(1) of the Tamil Nadu Goods & Services Tax Act 2017

Notification No. 1/2017-Central Tax (Rate) dated 28.06.2017

Notification No. 9/2025-Central Tax (Rate) dated 17.09.2025



For the Practitioner

This ruling clarifies that for multi-pack apparel, the **tax threshold is applied to the individual unit** rather than the total pack value. It settles that packing multiple items together does not automatically convert them into a single 'piece' for GST valuation. Practitioners should note that this decision reinforces the **strict interpretation of 'per piece' valuation** for apparel under the relevant notifications.

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 -> [link up textiles pvt ltd aaar order.pdf](#)

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