M/s Macro Media Digital Imaging Pvt. Ltd., 55 Canal East Road, Kolkata-700085 (Appellant)

Appellate Authority for Advance Ruling — West Bengal

Appeal Case No. 12/WBAAR/APPEAL/2019 dated 19.09.2019 (order date… Dated **19.09.2019**

Q Questions Before the Authority

- Whether the job of printing content provided by the customer on polyvinyl chloride banners, and supplying such printed trade advertisement material, amounts to a supply of goods.
- If the transaction is a supply of goods, what is the classification of such trade advertisement material under the GST Tariff.

F Facts

The Appellant prints advertising content supplied by its customers onto base material such as PVC cloth or paper, and supplies both the printing ink and the base material. The Appellant contended that the transaction is a composite supply whose principal element is goods, so that it should be classified under heading 4911. The Advance Ruling Authority had treated printing as the predominant element and the printed material as ancillary.

H Ruling

Whether printing customer content on PVC banners and supplying the printed material is a supply of goods	**No. The predominant supply is of service (printing).**	Treated as a composite supply in which the printing service is principal and the printed goods are ancillary. The Appellant's reliance on Circular 11/11/2017-GST para 5 was rejected as the case fell within para 4.
Classification of the trade advertisement material under the GST Tariff, if a supply of goods	**Not decided. The appeal was dismissed on the footing that the supply is a service.**	The Appellant's claimed HSN 4911 (sub-heading 4911 10) was not accepted. The order does not state a classification for the goods.

The Appellate Authority dismissed the appeal and upheld the Advance Ruling Authority's view that the transaction is predominantly a **supply of service** (printing), with the printed PVC material ancillary to it. It found no basis for the Appellant's claim that it supplies goods only. The order does not separately decide the tariff classification, since the premise for it was not accepted.

R Reasoning

The Authority read paras 4 and 5 of Circular No. 11/11/2017-GST dated 20.10.2017 together. Under para 4, where the content owner holds the usage rights and the printer supplies the physical inputs, printing is the principal supply and is a service. Under para 5, the printed articles have a secondary use, such as wallpaper protecting a wall, and goods are the principal supply. The Authority found that PVC advertising sheets have no use other than displaying the content, and that the content is owned exclusively by the client, so the case fell

under para 4. It also relied on the Appellant's own purchase orders and invoices, which describe the work as 'Digital Printing – Outdoor' and 'Printing charges', to conclude that the service is what is actually supplied.

P Provisions Relied On

- Section 97 of the WBGST Act / CGST Act, 2017 (advance ruling application)
- Section 100(1) of the WBGST Act / CGST Act, 2017 (appeal to the Appellate Authority)
- Section 2(52) of the GST Act (definition of goods), as argued by the Appellant
- Section 8 of the GST Act (tax treatment of composite supplies), as argued by the Appellant
- CBIC Circular No. 11/11/2017-GST dated 20.10.2017, paras 4 and 5
- Circular F. No. 332/2/2017-TRU dated December 2017, serial no. 59 (cited by the Appellant)
- Customs Tariff Act, 1975, Chapters 39 and 49, and heading 4911 (as cited)
- Heading 9989 of the scheme of classification of services (as cited in para 4 of the Circular)
- Telangana AAR ruling TSAAR/4/2018 dated 30.05.2018 (cited by the Appellant, not followed)

! For the Practitioner

This order is useful for printers who supply their own base material and print customer artwork on PVC or paper for advertising. It shows that the Appellate Authority will test the contract in substance, using the usage rights in the content, whether the printed article has any use beyond carrying the content, and how the customer's purchase orders describe the work. It does not decide the tariff classification of printed advertising material, and it does not settle the position where the content owner is the printer or where the printed material has a secondary use. The bench also left the Telangana ruling unconsidered on its merits.

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 -> wb_aaar_12_2019_19.09.2019.pdf

Prepared 09-11-2026.

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