M/s. C.P.R. Mill

Authority for Advance Ruling — Tamil Nadu

ORDER No.8/AAR/2018 Dated **30.08.2018**

Q Questions Before the Authority

- Classification of 'Cattle Feed in Cake Form' and exemption if any

F Facts

The applicant is engaged in the manufacture of 'Cattle Feed in Cake Form' by pulverizing groundnut oil cake along with husked rice, broken rice, black & broken rice, jaggery, salt, and water, followed by mixing, condensing, and steaming into solid cake form. The applicant sought an advance ruling on the appropriate HSN classification for this product and whether it is eligible for GST exemption as animal feed.

H Ruling

Classification and exemption of Cattle Feed in Cake Form	**Classifiable under **HSN 23099010** and **exempted** from GST**	Exempt under Sl. No. 102 of Notification No. 2/2017-Central Tax (Rate) dated 28.06.2017 as amended

The Authority ruled that 'Cattle feed in cake form' manufactured by combining groundnut oil cake with other ingredients is classifiable under **Chapter Heading 23099010** as 'Compounded animal feed'. The product is **exempt from GST** for both intra-state and inter-state supplies pursuant to Sl. No. 102 of Notification No. 2/2017-Central Tax (Rate) and corresponding notifications.

R Reasoning

The Authority noted that Chapter Heading 2305 covers unmixed oil-cakes and solid residues from groundnut oil extraction. Chapter Heading 2309 covers preparations used in animal feeding where raw materials lose their original essential characteristics through processing. Laboratory test reports established that the applicant's product differs substantially in composition (protein, ash, fat, and salt content) from plain groundnut oil cake due to the addition of rice, jaggery, and salt. Applying HSN Explanatory Notes and General Rules for Interpretation of Customs Tariff, the final product is a **compounded animal feed** falling under HSN 23099010, eligible for full **GST exemption** .

P Provisions Relied On

Section 9 of CGST Act, 2017	Section 11 of CGST Act, 2017
Chapter Heading 2305	Chapter Heading 2309 90 10

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

Notification No. 1/2017-Central Tax (Rate)	Notification No. 2/2017-Central Tax (Rate) (Sl. No. 102)
Notification No. II(2)/CTR/532(d-5)/2017 (Sl. No. 102)	Notification No. 2/2017-Integrated Tax (Rate) (Sl. No. 102)

! For the Practitioner

This ruling establishes that mixing oil cakes with food grains, jaggery, and salt creates a distinct **compounded animal feed** classifiable under HSN 2309 90 10 rather than pure oil cake residues under CTH 2305. Manufacturers of processed cattle feed cakes can rely on this precedent to claim complete **GST exemption** under Notification No. 2/2017-Central Tax (Rate). It does not apply to unmixed oil cakes supplied directly without further processing or nutritional compounding.

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 -> tn.8 aar 2018-cprm.pdf

Prepared 23-10-2026.

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