

Gorantla Geosynthetics Private Limited

Authority for Advance Ruling — Tamil Nadu

Advance Ruling No.114/AAR/2023 Dated:17.11.2023

Q Questions Before the Authority

- Classification of the services provided by the applicant.
- Whether services provided by the applicant are exempted under Sl.No.3 of Notification No.12/2017 dated 28.07.2017 as amended?
- Whether the service recipient i.e., M/s.Tumkur Smart city Corporation is a "Governmental Authority" as per the definition of Notification No.12/2017 - CT dated 28.06.2017?

F Facts

The applicant is engaged in providing solid waste management services, specifically bio-mining and land reclamation of an existing dump site for the Tumkur City Corporation. The project was awarded following a tender process, and the applicant is responsible for the segregation, treatment, and disposal of legacy waste. The applicant sought an advance ruling to determine the taxability and eligibility for exemption of these services.

H Ruling

Classification of services	SAC 9994, attracting 18% GST (9% CGST + 9% SGST, or 18% IGST)	None
Exemption under Notification No.12/2017	Exempted in terms of Sl.No.3 of the notification	Applicable to services provided to Tumkur City Corporation
Status of Tumkur Smart City Corporation	Not covered under Section 97(2) of the CGST/TNGST Act, 2017	Authority refrained from giving any ruling

The authority ruled that the services provided by the applicant are classified under SAC 9994 and are subject to 18% GST. However, it concluded that these services are exempt from GST when provided to the Tumkur City Corporation, as it qualifies as a local authority performing functions entrusted under the Constitution. The authority declined to rule on the status of Tumkur Smart City Limited, stating it was not a relevant question for the applicant's tax liability.

R Reasoning

The authority determined that the applicant's activities constitute pure services provided to a local authority in relation to functions listed in the Twelfth Schedule of the Constitution, specifically public health and sanitation. It relied on the definition of local authority under Section 2(69) of the CGST Act and the exemption provided under

Sl.No.3 of Notification No.12/2017-Central Tax (Rate). The authority found that the Tumkur City Corporation is a **local authority** and the services qualify as **pure services**. Consequently, the exemption applies to the supply of these services to the corporation.

P Provisions Relied On

Section 98(4) of the CGST Act, 2017

Section 103(1) of the CGST Act, 2017

Section 97(2) of the CGST Act, 2017

Section 2(69) of the CGST Act, 2017

Notification No.12/2017-Central Tax (Rate) dated 28.06.2017

Notification No.11/2017-Central Tax (Rate) dated 28.06.2017

! For the Practitioner

This ruling confirms that bio-mining and site remediation services provided to a municipal corporation qualify for the **GST exemption** for pure services under Notification No.12/2017. It provides a clear precedent for contractors working on municipal solid waste projects. Practitioners should note that the ruling does not extend to entities like Special Purpose Vehicles (SPVs) if they are not considered local authorities.

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 -> 114_gorantla.pdf

Prepared 13-10-2026.

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