

Divisional Forest Officer, Dehradun

Authority for Advance Ruling — Uttarakhand

Ruling No: 01/2018-19, 20th of April, 2018

Dated **20.03.2018**

Q Questions Before the Authority

- Whether GST is leviable on the 'Marg Sudharan Shulk' charged by Forest Division Dehradun from the non government, private and commercial vehicles engaged in mining work in lieu of use of forest road.
- Whether GST is leviable on the 'Abhivahan Shulk' charged by Forest Division Dehradun from the non government, private and commercial vehicles engaged in mining work in lieu of use of forest road.

F Facts

The applicant, a Forest Division, collects 'Marg Sudharan Shulk' (road maintenance charges) and 'Abhivahan Shulk' (transit fees) from private and commercial vehicles engaged in mining activities within their jurisdiction. These charges are collected for the use of forest roads and for the transit of forest produce, respectively. The applicant sought an advance ruling on the taxability of these two specific levies under the GST regime.

H Ruling

Marg Sudharan Shulk	No GST is leviable	Treated as toll charges for access to a road
Abhivahan Shulk	Liable to pay GST @ 18%	Classified under Service Code 9997 as other services

The Authority ruled that 'Marg Sudharan Shulk' is in the nature of toll charges for the use of roads and is therefore exempt from GST. Conversely, 'Abhivahan Shulk' is considered a consideration for services provided by the forest department in relation to the transit of forest produce and is subject to GST at the rate of 18%.

R Reasoning

The Authority determined that 'Marg Sudharan Shulk' qualifies as a toll charge, which is included in the list of exempted services under GST. Regarding 'Abhivahan Shulk', the Authority found it to be a consideration for services rendered by the department for the transit of forest produce, rather than a tax. Since these services are not specifically exempted under Chapter 99 of the GST Tariff, 2017, they are taxable. The decision relies on the definition of services under Section 2(102) of the CGST Act, 2017.

P Provisions Relied On

Section 97(1) of the CGST Act, 2017

Section 97(2)(e) of the CGST Act, 2017

Section 2(102) of the CGST Act, 2017

Chapter 99 of GST Tariff, 2017



For the Practitioner

This ruling clarifies the tax treatment of forest department levies, distinguishing between **exempt toll-like charges** and **taxable service considerations**. It provides a precedent for other forest divisions to categorize their various fees based on whether they constitute a toll for road access or a fee for administrative services. Practitioners should note that the classification depends heavily on the underlying purpose of the fee as defined by local transit rules.

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 -> 01-2018-19_dtd_20-04-18_uttrakhand-df.pdf

Prepared 15-10-2026.

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