

M/s. GORANTLA GEOSYNTHETICS LTD.

Authority for Advance Ruling — Tamil Nadu

Advance Ruling No. 15/ARA/2026

Dated **27.02.2026**

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 28.06.2017 as amended?
- Whether the service recipient i.e., M/s. Ariyalur Municipality is a "Governmental Authority" as per the definition of Notification No.12/2017, Central Tax, dated 28.06.2017?

F Facts

The applicant is a service provider engaged in Municipal Solid Waste Management, specifically executing a project for the reclamation of an existing dump yard in Ariyalur Municipality. The project involves the excavation, screening, shredding, and scientific disposal of legacy waste to ensure environmental protection. The applicant sought an advance ruling on the classification of these services and their eligibility for tax exemption.

H Ruling

Classification of services	SAC 9994, attracting GST at 18% (9%-CGST + 9%-SGST, or 18%-IGST)	Covers bio-mining of waste and remediation of site
Exemption under Notification No.12/2017	Exempted under Sl.No.3	Applicable as pure services provided to a local authority
Status of service recipient	Not answered	The authority refrained from ruling as it was not a question regarding the applicant's own supply

The authority ruled that the services provided by the applicant are classified under SAC 9994 and attract GST at 18%. However, it held that these services are exempt from GST under Sl.No.3 of Notification No.12/2017 as they constitute pure services provided to a local authority. The authority declined to rule on the third question regarding the status of the service recipient, as it did not pertain to a supply undertaken by the applicant.

R Reasoning

The authority determined that the applicant's activities constitute 'pure services' related to sanitation and solid waste management, which are functions entrusted to a municipality under Article 243W of the Constitution. Relying on the definition of 'local authority' under Section 2(69) of the CGST Act, 2017, it concluded that the services provided to the Ariyalur Municipality qualify for the exemption under Sl.No.3 of Notification No.12/2017. The classification under SAC 9994 was based on the nature of the work involving waste treatment and

remediation services. The authority declined to rule on the third question, noting that an advance ruling must relate to a supply undertaken by the applicant.

P Provisions Relied On

Section 98(4) 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, dated 28.06.2017
Notification No.11/2017 Central Tax (Rate), dated 28.06.2017	
Article 243W of the Constitution	

! For the Practitioner

This ruling confirms that **bio-mining and site remediation services** provided to a municipality qualify as exempt 'pure services' under Notification No.12/2017. It provides a favorable precedent for contractors engaged in similar **Swachh Bharat Mission** projects. Practitioners should note that the authority will not entertain questions regarding the legal status of a service recipient if that question does not directly impact the applicant's own tax liability.

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 -> 5-gorantla_ariyalur_aar_order_1.pdf

Prepared 12-10-2026.

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