

M/s Jivraj Tea International Pvt. Ltd.

Authority for Advance Ruling — Gujarat

GUJ/GAAR/R/2025/60

Dated **04.12.2025**

Q Questions Before the Authority

- Whether the supply of Jivvij Samaara Masala Instant Premix Tea sachets with Jivvij Samaara Black Tea Leaf 5 kg Pouch being the principal supply will be considered as the Composite Supply or Mixed Supply? What will be the rate of tax for the above?
- Whether the supply of Jivvij Samaara Masala Instant Premix Tea sachets with Samaara Premium Ctc Leaf Black Tea 250 gms Jar, 500 gms Jar & 900 gms Jar being the principal supply will be considered as the Composite Supply or Mixed Supply? What will be the rate of tax for the above?
- Whether the supply of Jivvij Samaara Masala Instant Premix Tea sachets with Premium Lemon, Jasmine and Mint Green Tea being the principal supply will be considered as the Composite Supply or Mixed Supply? What will be the rate of tax for the above?
- Whether the supply of Jivvij Samaara Masala Instant Premix Tea sachets with Herbal Tea (Chai Vedic) being the principal supply will be considered as the Composite Supply or Mixed Supply? What will be the rate of tax for the above?
- Whether the supply of Jivvij Samaara Masala Instant Premix Tea sachets with Pyramid Tea Bags being the principal supply will be considered as the Composite Supply or Mixed Supply? What will be the rate of tax for the above?
- Whether the supply of Jivvij Samaara Masala Instant Premix Tea sachets with Flavoured Black Tea (Saffron Tea & Rose Tea) being the principal supply will be considered as the Composite Supply or Mixed Supply? What will be the rate of tax for the above?
- In future, if we supply Jivvij Samaara Masala Instant Premix Tea sachets with any other product having rate of tax at 5% being the principal supply, will be considered as the Composite Supply or Mixed Supply? What will be the rate of tax for the above?
- What will be HSN code to be used by us in above case?

F Facts

The applicant is a manufacturer and supplier of various types of tea. They intend to supply sachets of Masala Instant Premix Tea along with their regular tea products as an introductory offer to analyze market demand. These items are sold together for a single price.

H Ruling

Premix tea with Black Tea Leaf 5 kg Pouch	Mixed Supply; 5% GST	None
Premix tea with Premium Ctc Leaf Black Tea (various sizes)	Mixed Supply; 5% GST	None

Premix tea with Premium Lemon, Jasmine and Mint Green Tea	Mixed Supply; 5% GST	None
Premix tea with Herbal Tea (Chai Vedic)	Mixed Supply; 5% GST	None
Premix tea with Pyramid Tea Bags	Mixed Supply; 5% GST	None
Premix tea with Flavoured Black Tea	Mixed Supply; 5% GST	None
Future supply with other 5% rated products	Mixed Supply; 5% GST	Subject to future tax rate changes
HSN code to be used	Any HSN of the supplies in the bundle	Applicable while rates are equal; otherwise use HSN of the highest rated supply

The Authority ruled that the supply of premix tea sachets bundled with various tea products constitutes a **Mixed Supply** rather than a Composite Supply. Consequently, the entire supply is taxable at the rate applicable to the item with the highest tax rate within the bundle. Since all items currently attract a 5% GST rate, the bundled supply is taxable at 5%.

R Reasoning

The Authority determined that the products are not naturally bundled in the ordinary course of business, as the premix tea is not an ancillary commodity essential for the enjoyment of the main tea product. Because the items are sold together for a single price and do not meet the criteria for a composite supply under Section 2(30) of the CGST Act, they fall under the definition of a mixed supply per Section 2(74). Tax liability is determined under Section 8(b) of the CGST Act, which mandates applying the highest rate of tax among the supplies in the bundle.

P Provisions Relied On

Section 2(30) of the CGST Act, 2017	Section 2(74) of the CGST Act, 2017
Section 2(90) of the CGST Act, 2017	Section 8(b) of the CGST Act, 2017

! For the Practitioner

This ruling clarifies that promotional bundling of non-ancillary products for a single price is treated as a **Mixed Supply**. Practitioners can use this to advise clients that such bundles attract the highest tax rate of the constituent items. It does not provide a definitive HSN rule for cases where tax rates differ, other than referencing the highest-rated item.

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 -> [1-jivraj_tea.pdf](#)

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