

M/s. Power Build Private Limited

Authority for Advance Ruling — Gujarat

ADVANCE RULING NO. GUJ/GAAR/R/2017-18/2

Dated **13.12.2017**

Q Questions Before the Authority

- What is the HSN Code and GST Tax Rate of a product 'Geared Motor'?

F Facts

The applicant manufactures and supplies 'Geared Motors', which are assemblies consisting of an Electric Motor coupled with a Gear Box. The applicant sought a ruling on the correct classification and GST rate for this assembly, noting that the individual components fall under different HSN codes and tax rates. The applicant contended that the product should be classified under the HSN code for Electric Motors.

H Ruling

Geared Motor	Chapter Heading 8501	Taxed at the rate applicable to Electric Motors
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The Authority ruled that the product 'Geared Motor' is classifiable under Chapter Heading 8501 of the Customs Tariff Act, 1975. Consequently, the GST rate applicable to Chapter Heading 8501 applies to the product.

R Reasoning

The Authority relied on the Explanatory Notes of the Harmonized System of Nomenclature (HSN) for Tariff Headings 8483 and 8501. The notes for Heading 8483 explicitly state that it does not cover gear boxes combined with a motor, while the notes for Heading 8501 specify that motors remain classified there even when equipped with gears or gear boxes. Therefore, the assembly is **appropriately classified under Heading 8501** as an electric motor. This interpretation aligns with the principle that HSN Explanatory Notes are a dependable guide for tariff classification.

P Provisions Relied On

Section 97(2) of CGST / GGST Act, 2017

Notification No. 1/2017-Central Tax (Rate) dated 28.06.2017

Customs Tariff Act, 1975

Harmonized System of Nomenclature (HSN) Explanatory Notes



For the Practitioner

This ruling provides clarity for manufacturers of geared motors by confirming that the assembly is **classified under the motor's HSN code (8501)** rather than the gear box's code (8483). It settles the classification dispute by prioritizing the HSN Explanatory Notes over the individual components' classifications. Practitioners can use this to support the tax treatment of similar integrated electrical-mechanical assemblies.

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 -> [guj-2017-18-2 dt 13-12-17 power build 0.pdf](#)

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