

M/s. SATS Food Solutions India Private Limited

Authority for Advance Ruling — Karnataka

Advance Ruling No. KAR ADRG 11/2023 dated 21.02.2023

Q Questions Before the Authority

- Applicable GST rate on their products.

F Facts

The applicant is a manufacturer of frozen food products, including Ready-to-Eat (RTE) and Ready-to-Cook (RTC) items, supplied in bulk institutional packs to B2B customers like airlines and hotels. These products require further processing such as thawing and cooking by the recipient before they are fit for human consumption. The applicant sought a ruling on the applicable GST rate for these products.

H Ruling

Applicable GST rate on products	18% GST (9% CGST and 9% SGST)	As per entry No. 23 of Schedule III of Notification No. 1/2017-Central Tax (Rate)
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The Authority ruled that the food products manufactured by the applicant are classifiable under tariff heading 2106 and are subject to GST at the rate of 18%. This rate is applicable as per entry No. 23 of Schedule III of Notification No. 1/2017-Central Tax (Rate).

R Reasoning

The Authority examined the nature of the products, which are pre-cleaned, precooked, and packaged, requiring further preparation by the buyer. It determined these products fall under tariff heading 2106, specifically covering preparations for use, either directly or after processing, for human consumption. Consequently, the products attract the **18% GST rate** under entry No. 23 of Schedule III of Notification No. 1/2017-Central Tax (Rate).

P Provisions Relied On

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

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

Customs Tariff Act, 1975

! For the Practitioner

This ruling clarifies that frozen food products supplied in bulk to institutional buyers, which require further processing, are **taxable at 18%** under HSN 2106. It helps practitioners classify similar B2B food supplies that are not ready for immediate consumption. It does not address the taxability of retail-ready food products or restaurant services.

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 -> [knaar_order_no.112023_sats_food_solutions_1.pdf](#)

Prepared 20-10-2026.

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