

Palaniappan Chinnadurai [Prop: M/s.Tuticorin Lime and Chemical Industries]

Authority for Advance Ruling — Tamil Nadu

ORDER No.25/AAR/2018 DATED:31.12.2018

Q Questions Before the Authority

- What is the applicable chapter and GST rate for Industrial Grade Quick Lime having 86% of Calcium Oxide content and Industrial Grade Slaked Lime having 86% of Calcium Hydroxide content?

F Facts

The applicant manufactures industrial grade Quick Lime and Slaked Lime with a purity of 86% for supply to water treatment plants and chemical industries. They sought a ruling on the correct classification and GST rate for these high-purity products. The applicant previously relied on an older excise ruling to argue for classification under Chapter 28.

H Ruling

Industrial Grade Quick Lime (86% purity)	CTH 28259090, 18% GST	Taxable at 9% CGST and 9% SGST
Industrial Grade Slaked Lime (86% purity)	CTH 28259040, 18% GST	Taxable at 9% CGST and 9% SGST

The Authority ruled that the industrial grade Quick Lime and Slaked Lime with 86% purity are classifiable under Chapter 28. Specifically, they are taxable at 18% GST (9% CGST and 9% SGST).

R Reasoning

The Authority distinguished between low-purity lime used for building purposes (Chapter 25) and high-purity industrial grade lime (Chapter 28). It reasoned that the applicant's products, being of 86% purity, are **separate chemically defined compounds** rather than crude mineral products. The decision relied on the HSN Explanatory Notes to Chapter 28 and the specific entry at Sl. No. 38 of Schedule III of Notification No. 01/2017-Central Tax (Rate).

P Provisions Relied On

Section 98 of the CGST Act 2017

Notification No. 01/2017-Central Tax (Rate) dated 28.06.2017

G.O. (Ms) No. 62 dated 29.06.2017

Chapter 25 and Chapter 28 of the Customs Tariff Act



For the Practitioner

This ruling clarifies that **high-purity industrial lime** is excluded from the lower-rated Chapter 25 and falls under the 18% GST bracket of Chapter 28. It provides a clear threshold for practitioners to distinguish between building-grade and industrial-grade lime based on purity levels. It does not apply to low-purity lime used for traditional building purposes like white-washing.

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 -> [tn-25-aar-2018.pdf](#)

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