

TRAVANCORE DEVASWOM BOARD

Authority for Advance Ruling — Kerala

ADVANCE RULING No. KER/01/2026

Dated **04.03.2026**

Q Questions Before the Authority

- Whether GST is applicable on the consideration received by the Applicant for assignment, through auction or tender, of the right to collect remnant rice offerings at Sabarimala?
- Whether GST is applicable on the consideration received by the Applicant for assignment, through auction or tender, of the right to collect coconuts and broken coconuts offered by devotees in temples under its administration?
- Whether GST is applicable on the consideration received by the Applicant for assignment, through auction or tender, of the right to collect clothing left by pilgrims in the Pamba River?
- Whether GST is applicable on the consideration received by the Applicant from auction or tender of agricultural produce, mainly coconut yield from temple lands?
- Whether GST is payable under the Reverse Charge Mechanism on honorarium and sitting fees paid by the Applicant to the President and Members of the Travancore Devaswom Board?
- Whether GST is payable under the Reverse Charge Mechanism on advocate fees or legal fees paid by the Applicant to suppliers who are not registered under GST?
- Whether GST is applicable on the consideration received by the Applicant for assignment, through auction or tender, of the right to perform temple rituals and customs such as Pulluvan Pattu and Balithara?
- Whether GST is applicable on the consideration received by the Applicant for assignment, through auction or tender, of the right to operate and maintain public toilets and washrooms exclusively for devotees within temple premises?
- Whether GST is applicable on the consideration received by the Applicant for assignment, through auction or tender, of the right to sell pooja items within temple precincts?

F Facts

The applicant is a statutory body managing over 1,250 temples in Kerala. It generates revenue by auctioning or tendering various rights, including the collection of offerings, agricultural produce, and the operation of amenities like toilets and pooja stalls. The applicant contends these activities are incidental to religious services and not commercial in nature.

H Ruling

Collection of remnant rice	Taxable supply of services	Liable to GST
Collection of coconuts/broken coconuts	Taxable supply of services	Liable to GST

Collection of abandoned clothes	Taxable supply of services	Liable to GST
Harvesting of coconuts from temple lands	Exempt	Exempt under Entry No. 54 of Notification No. 12/2017-Central Tax (Rate)
Honorarium and sitting fees	Not applicable	Not liable to GST under RCM
Advocate/legal fees	Applicable under RCM	Liable to GST under Entry No. 2 of Notification No. 13/2017-Central Tax (Rate)
Performance of rituals	Taxable supply of services	Liable to GST
Operation of toilets/washrooms	Taxable supply of services	Liable to GST
Sale of pooja items	Exempt	Exempt under Entry No. 13(b) of Notification No. 12/2017-Central Tax (Rate) subject to monetary thresholds

The Authority ruled that most of the applicant's auction-based activities constitute a **taxable supply of services** by way of granting a license or right for consideration. However, it held that the auctioning of rights to harvest coconuts from temple lands is exempt as a service related to agricultural operations. Additionally, it determined that honorarium and sitting fees paid to board members are not subject to the Reverse Charge Mechanism.

R Reasoning

The Authority determined that the applicant is a business entity under Section 2(17) of the CGST Act and that its auctioning of rights constitutes a **supply of services** under Section 7(1). It reasoned that the applicant is granting an exclusive commercial license to third parties, which is distinct from the religious activities themselves. Exemptions were applied strictly based on specific entries in Notification No. 12/2017-Central Tax (Rate). The RCM liability for legal services was confirmed under Notification No. 13/2017-Central Tax (Rate), while board members were found not to be directors.

P Provisions Relied On

Section 2(17) of the CGST Act, 2017	Section 7(1) of the CGST Act, 2017
Schedule II of the CGST Act, 2017	Notification No. 12/2017-Central Tax (Rate)
Notification No. 13/2017-Central Tax (Rate)	

! For the Practitioner

This ruling clarifies that religious institutions acting as statutory bodies are considered business entities when they auction rights for commercial exploitation. It provides a clear distinction between exempt agricultural/religious services and taxable licensing services. Practitioners should note that the **commercial nature of the contract** overrides the religious context of the underlying activity.

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-travancore devaswom board ar_order.pdf

Prepared 12-10-2026.

About Patron Accounting LLP

Patron Accounting LLP is a CA and CS-led accounting and compliance firm working with businesses across India since 2019 — bookkeeping, GST, income tax, payroll, company and LLP compliance, audit and the certificates banks and regulators ask for.

Pune (HQ)

RTC Silver, B4-708, Sai Satyam Park, Wagholi, Pune, Maharashtra 412207

Delhi

3rd Floor, B-6/154-155, Sector 5, Rohini, Delhi 110085

Ahmedabad

Phoenix Tower, 1107, near Commerce Six Road, Drive In Road, Navrangp...

Mumbai

104, Rajshila Building, 597 J.S.S. Road, Marine Lines, Mumbai 400002

Gurugram

Pioneer Urban Square, B109, Golf Course Ext Road, Sector 62, Gurugram...

Talk to us: **+91 94594 56700** | sales@patronaccounting.com | patronaccounting.com