



TELANGANA STATE AUTHORITY FOR ADVANCE RULING
CT Complex, M.J Road, Nampally, Hyderabad-500001.
(Constituted under Section 96(1) of TGST Act, 2017)

Present:

Sri B. Raghu Kiran, IRS, Additional Commissioner (Central Tax)

Sri S.V. Kasi Visweswara Rao, Additional Commissioner (State Tax)

A.R.Com/06/2022

Date:15.07.2022

TSAAR Order No.45/2022

[ORDER UNDER SECTION 98(4) OF THE CENTRAL GOODS AND SERVICES TAX ACT, 2017 AND UNDER SECTION 98(4) OF THE TEALANGANA GOODS AND SERVICES TAX ACT, 2017.]

1. M/s. Hyderabad Security Offset Printers Private Limited, B-12, Hyderabad Security And Offset Printers Private Limited, Ida Uppal, Uppal, Hyderabad, Telangana- 500 039 (36AAACH5919A1ZY) has filed an application in FORM GST ARA-01 under Section 97(1) of TGST Act, 2017 read with Rule 104 of CGST/TGST Rules.
2. At the outset, it is made clear that the provisions of both the CGST Act and the TGST Act are the same except for certain provisions. Therefore, unless a mention is specifically made to any dissimilar provisions, a reference to the CGST Act would also mean a reference to the same provision under the TGST Act. Further, for the purposes of this Advance Ruling, the expression 'GST Act' would be a common reference to both CGST Act and TGST Act.
3. It is observed that the queries raised by the applicant fall within the ambit of Section 97 of the GST ACT. The Applicant enclosed copies of challans as proof of payment of Rs. 5,000/- for SGST and Rs. 5,000/- for CGST towards the fee for Advance Ruling. The concerned jurisdictional officer also raised no objection to the admission of the application. The application is therefore, admitted
4. **Brief facts of the case:**
The applicant M/s. Hyderabad Security Offset Printers Private Limited is printing leaflets and packing materials of his clients pertaining to pharmaceutical sector. The leaflet contains the literature pertaining to said medicine. The applicant is desirous of knowing the rate of tax on the services supplied by them. Hence this application.
5. **Questions raised:**
What is the rate of tax including HSN code for printing of leaflets?

6. **Personal Hearing:**

The Authorized representatives Sri P. Venkata Ramana, GM Finance attended the personal hearing held on 27.04.2022. The authorized representatives reiterated their averments in the application submitted and contended as follows:

1. That, they are into the business of printing and sale of packing material for pharmaceutical companies.
2. That, they also print leaflets containing the literature of pertaining to the said medicine.
3. That, they are presently charging 18% on such leaflets. However they are desirous of ascertaining the actual liability.

Therefore they requested AAR to dispose the case basing on the averments made by them.

7. **Discussion & Findings:**

The applicant is printing leaflets and packing materials of his clients pertaining to pharmaceutical sector. The leaflet contains the literature pertaining to said medicine.

The Notification No. 11/2017 was amended on 22.08.2017 to insert the following at serial no. 27 by substitution:

	(2)	(3)		(5)
	Heading 9989	(i) Services by way of printing of newspapers, books (including Braille books), journals and periodicals, where only content is supplied by the publisher and the physical inputs including paper used for printing belong to the printer.		-
		(ii) Other manufacturing services; publishing, printing and reproductionservices; materials recovery services, other than (i) above.		-

The applicant is providing services of printing but this activity of printing does not fall under item (i) of heading 9989 i.e., printing of newspapers, books (including Braille books), journals and periodicals and hence is covered under Heading 9989 (ii) of Notification No.11/2017-Central Tax (Rate), dated: 28-06-2017 as amended and is taxable at 9% CGST & 9% SGST.

Further, by amended Notification No. 31/2017 – Central Tax (Rate) dt 13.10.2017 the following entry was introduced at serial no. 26 with chapter heading 9988 at sub item (iia)

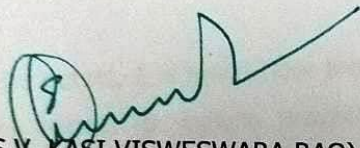
“(iia) Services by way of any treatment or process on goods belonging to another person, in relation to printing of all goods falling under Chapter 48 or 49, which attract CGST @ 6per cent.”

In light of the above amended entry, it is clarified that where the applicant uses physical input, i.e., paper supplied by their client for the purpose of goods falling under chapter 48 or 49 of customs taxable @6% CGST then the same will be taxable at 6% under CGST.

8. The ruling is given as below:

In view of the above discussion, the questions raised by the applicant are clarified as below:

Questions	Ruling
What is the rate of tax including HSN code for printing of leaflets?	a. Where the physical inputs are used by the applicant, the activity falls under S.No. 27(ii) of the Notification No. 11/2017 and hence is liable to be taxed @9% CGST & SGST each. b. Where the physical inputs are supplied by the recipient of services, the activity falls under S.No. 26(iia) of Notification No. 11/2017 as amended on 13.10.2017 and same is taxable @6% CGST & SGST each.



(S.V. KASI VISWESWARA RAO)
ADDL. COMMISSIONER(STATE TAX)



(B. RAGHU KIRAN)
ADDL. COMMISSIONER(CENTRAL TAX)

[Under Section 100(1) of the CGST/TGST Act, 2017, any person aggrieved by this order can prefer an appeal before the Telangana State Appellate Authority for Advance Ruling, Hyderabad, within 30 days from the date of receipt of this Order]

To
M/s. Hyderabad Security Offset Printers Private Limited,
B-12, Hyderabad Security And Offset Printers Private Limited,
Ida Uppal, Uppal, Hyderabad, Telangana- 500 039.

- Copy submitted to :
1. The Commissioner (State Tax) for information.
 2. The Commissioner (Central Tax), Secunderabad Commissionerate, Room No. 800, 7th Floor, GST Bhavan, Hyderabad Telangana 500004.
- Copy to:
3. The Assistant Commissioner (ST) Hyderguda - Ashok Nagar Circle.