

**AUTHORITY FOR ADVANCE RULING, TAMIL NADU  
No.207, 2<sup>nd</sup> FLOOR, PAPJM BUILDING, No.1, GREAMS ROAD,  
CHENNAI 600 006.**

**ORDER UNDER SECTION 98(4) OF THE CGST ACT, 2017 AND  
UNDER SECTION 98(4) OF THE TNGST ACT, 2017**

**Members present:**

<b>Shri C. Thiyagarajan, I.R.S., Commissioner/Member (CGST), Office of the Commissioner of GST and Central Excise, Audit I Commissionerate, Chennai - 600 101.</b>	<b>Shri B. Suseel Kumar, B.E., MBA., Joint Commissioner/Member (SGST), Authority for Advance Ruling, Tamil Nadu, Chennai - 600 006.</b>
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**Advance Ruling No. 15/ARA/2026, dated 27.02.2026**

- 1. Any appeal against this Advance Ruling order shall lie before the Tamil Nadu State Appellate Authority for Advance Ruling, Chennai as under Sub-Section (1) of Section 100 of CGST Act / TNGST Act 2017, within 30 days from the date on the ruling sought to be appealed is communicated.*
- 2. In terms of Section 103(1) of the Act, Advance Ruling pronounced by the Authority under Chapter XVII of the Act shall be binding only-*
  - (a) on the applicant who had sought it in respect of any matter referred to in sub-section (2) of Section 97 for advance ruling.*
  - (b) on the concerned officer or the jurisdictional officer in respect of the applicant.*
- 3. In terms of Section 103(2) of the Act, this advance ruling shall be binding unless the law, facts or circumstances supporting the original advance ruling have changed.*
- 4. Advance Ruling obtained by the applicant by fraud or suppression of material facts or misrepresentation of facts, shall render such ruling to be void ab initio in accordance with Section 104 of the Act.*
- 5. The provisions of both the Central Goods and Services Tax Act and the Tamil Nadu Goods and Services Tax Act (herein referred to as the Act) are the same except for certain provisions. Therefore, unless a mention is specifically made to such dissimilar provisions, a reference to the Central Goods and Services Tax Act would also mean a reference to the same provisions under the Tamil Nadu Goods and Services Tax Act.*

GSTIN Number, if any / User id	33AACCG6068M1ZC
Legal Name of Applicant	M/s. GORANTLA GEOSYNTHETICS LTD.
Trade Name of Applicant	M/s. GORANTLA GEOSYNTHETICS LTD.
Registered Address / Address provided while obtaining user id	No.3, First Floor, Saraswathi Street, Mahalingapuram, Kodambakkam, Chennai – 600 034.
Details of Application	GST ARA – 01 Application dated 29.09.2025 (ARA.No.46/2025/ARA)
Jurisdictional Officer Concerned Officer	<b>Center:</b> Chennai North Commissionerate, Nungambakkam Division  <b>State:</b> Valluvarkottam Assessment Circle, Chennai (Central) Division.
Nature of activity(s) (proposed / present) in respect of which advance ruling sought for  A Category B Description (in brief)	Service  The applicant is a service provider of Municipal Solid Waste Management Solutions. They are executing the project under Swachh Bharat Mission (Urban) 2.0 for “Reclamation of Existing Dump Yard located at Compost Yard by Removing the Legacy Waste in Ariyalur Municipality”.  They are handling a total volume of 16,055 m3 of legacy waste, which includes excavation, screening, shredding and scientific disposal in compliance with the Solid Waste Management Rules, 2016 and CPCB Guidelines of 2019. For the execution of this project, they are deploying a comprehensive set of machinery such as trommel screens for segregation of waste, excavators and JCBs for excavation, loading and site operations, along with tippers and trucks for transportation of segregated materials.  The segregated waste streams are managed responsibly to ensure compliance with environmental standards. Refuse Derived Fuel (RDF) generated from the screening process is transported to cement plants and other authorized facilities for co-processing. Compost and soil fractions are tested in accredited laboratories before being reused or disposed of, while inerts and rejects are

	<p>disposed of through scientific landfilling or other approved methods.</p> <p>Through this project, the applicant is ensuring proper environmental protection, reclaiming valuable land and contributing to sustainable waste management practices in Ariyalur Municipality.</p>
Issue/s on which advance ruling required	<ol style="list-style-type: none"> <li>1. Classification of goods and/or services or both.</li> <li>2. Application of a notification issued under the provisions of this Act.</li> </ol>
Question(s) on which advance ruling is required	<p>Q1. Classification of the services provided by the applicant.</p> <p>Q2. Whether services provided by the applicant are exempted under Sl.No.3 of Notification No.12/2017 dated 28.06.2017 as amended?</p> <p>Q3. Whether the service recipient, i.e., M/s. Ariyalur Municipality is a "Governmental Authority" as per the definition of Notification No.12/2017, Central Tax, dated 28.06.2017?</p>

**M/s. GORANTLA GEOSYNTHETICS LTD.**, No.3, First Floor, Saraswathi Street, Mahalingapuram, Kodambakkam, Chennai – 600 034. (hereinafter called as the "Applicant") are registered under the GST Act with GSTIN : 33AACCG6068M1ZC. The applicant is a service provider of Municipal Solid Waste Management Solutions. They are executing the project under Swachh Bharat Mission (Urban) 2.0 for "Reclamation of Existing Dump Yard located at Compost Yard by Removing the Legacy Waste in Ariyalur Municipality".

1.2 They are handling a total volume of 16,055 m<sup>3</sup> of legacy waste, which includes excavation, screening, shredding and scientific disposal in compliance with the Solid Waste Management Rules, 2016 and CPCB Guidelines of 2019. For the execution of this project, they are deploying a comprehensive set of machinery such as trommel screens for segregation of waste, excavators and JCBs for excavation, loading and site operations, along with tippers and trucks for transportation of segregated materials.

1.3 The segregated waste streams are managed responsibly to ensure compliance with environmental standards. Refuse Derived Fuel (RDF) generated from the screening process is transported to cement plants and other authorized facilities for co-processing. Compost and soil fractions are tested in accredited laboratories before being reused or disposed of, while inerts and rejects are disposed of through scientific landfilling or other approved methods.

1.4 Through this project, the applicant is ensuring proper environmental protection, reclaiming valuable land and contributing to sustainable waste management practices in Ariyalur Municipality. In this back drop, the applicant has sought advance ruling on the following questions :-

- Q1. Classification of the services provided by the applicant.
- Q2. Whether services provided by the applicant are exempted under Sl.No.3 of Notification No.12/2017 dated 28.06.2017 as amended?
- Q3. Whether the service recipient i.e., M/s. Ariyalur Municipality is a "Governmental Authority" as per the definition of Notification No.12/2017, Central Tax, dated 28.06.2017?

2. The Applicant has made a payment of application fees of Rs.5,000/- each under sub rule (1) of Rule 104 of CGST Rules, 2017 and SGST Rules, 2017.

**3. Statement of relevant facts:**

3.1 The applicant have stated that they are service providers engaged in Solid Waste Management for Governmental Authorities. With respect to these services, as per Notification No.12/2017 are judicial precedent, these services are covered under exemption.

3.2 In order to avoid any future legal implications, they are applying for an Advance Ruling to clarify whether Notification No.12/2017, is applicable to their company engaged in providing Solid Waste Management Services.

3.3 Further, the applicant states that they would like to draw reference to the case of Zigma Global Environ Solutions Private Limited, which is also engaged in similar services, wherein the Advance Ruling Authority held that such services are exempt (Ref. Order No.35/AAR/2020, dated 21.10.2020).

3.4 Further, they also like to refer their own case wherein the Advance Ruling Authority held that such services are exempt for their project at Tumkur Municipal Corporation (Ref. Order No.114/AAR/2023, dated 17.11.2023).

**4. Interpretation of Law by the Applicant based on the statement of facts:**

4.1 The applicant submits that the services provided by them which has predominant characteristics of Solid Waste Management and they will fall under SAC Code No.9994 "Sewage and Waste Collection, treatment and disposal and other environmental Protection Services" and in particular Group 99943 - Waste treatment and disposal services as per Annexure to Notification No.11/2017, Central Tax, dated 28.06.2017.

4.2 Ariyalur Municipality is under Government authority. For the purposes of this clause, the expression -

***“Government Authority” means an authority or a board or any other body***

- (i) *set up by an Act of Parliament or a State legislature; or*
- (ii) *established by any Government,*

*with ninety per cent or more participation by way of equity or control, to carry out any function entrusted to a municipality under article 243W of constitution.”*

4.3 Further, as per Clause (f) of Twelfth Schedule to Article 243W of the Constitution, their services falls under solid waste management which is a part of municipality services and provided to government.

5. The applicant falls within the administrative jurisdiction of ‘Center’. No remarks has been received from the State jurisdictional authorities as well as the Central jurisdictional authorities. Hence, it is construed that there are no pending proceedings against the applicant on the questions raised by them in their advance ruling application.

#### **6. Personal Hearing:**

6.1 The applicant was given an opportunity to be heard in person on 17.02.2026 vide this office memorandum No.46/2025, dated 10.02.2026. Mrs. G. Sundari, General Manager (Accounts & Finance) appeared as Authorized Representative (AR) of M/s. Gorantla Geosynthetics Ltd., for the personal hearing on 17.02.2026.

6.2 The AR reiterated the submissions made under the Application for Advance Ruling filed by the applicant. The AR further stated that the rulings already pronounced by the Tamil Nadu Authority for Advance Rulings in respect of M/s. Zigma Global Environ Solutions (P) Ltd., and in respect of their own unit for the services rendered to M/s. Tumkur City Corporations have precedence value in this regard.

6.3 The AR added that they render the service in question to M/s. Ariyalur Municipality. To a specific query relating to the nature of service rendered in the instant case, the AR explained that they undertake ‘Reclamation of Existing Dump Yard located at Compost Yard by Removing the Legacy Waste in Ariyalur Municipality’ which includes excavation, screening, shredding and scientific disposal of the legacy waste. When enquired about the Work Order issued by the competent authority in the instant case, the AR undertook to furnish the same at the earliest possible.

## **7. Discussions and Findings:**

7.1 We have carefully considered the submissions made by the applicant in the advance ruling application, the submissions made during the personal hearing held on 17.02.2026, and the additional documents furnished thereafter.

7.2 From the submissions made at the time of filing the application, it is seen that the applicant is a service provider of Municipal Solid Waste Management Solutions, and that they are executing the instant project under Swachh Bharat Mission (Urban) 2.0 for "Reclamation of Existing Dump Yard located at Compost Yard by Removing the Legacy Waste in Ariyalur Municipality". Under the instant project, they are reportedly handling a total volume of 16,055 m<sup>3</sup> of legacy waste, which includes excavation, screening, shredding and scientific disposal in compliance with the Solid Waste Management Rules, 2016 and CPCB Guidelines of 2019. For the execution of this project, they are deploying a comprehensive set of machinery such as trammel screens for segregation of waste, excavators and JCBs for excavation, loading and site operations, along with tippers and trucks for transportation of segregated materials. While the segregated waste streams are managed responsibly to ensure compliance with environmental standards, Refuse Derived Fuel (RDF) generated from the screening process is transported to cement plants and other authorized facilities for co-processing. Compost and soil fractions are tested in accredited laboratories before being reused or disposed of, while inerts and rejects are disposed of through scientific landfilling or other approved methods. Under these circumstances, the applicant had sought an advance ruling, on the following aspects, viz.,

1. Classification of the services provided by the applicant.
2. Whether services provided by the applicant are exempted under Sl.No.3 of Notification No.12/2017 dated 28.07.2017 as amended?
3. Whether the service recipient i.e., M/s. Ariyalur Municipality is a "Governmental Authority" as per the definition of Notification No.12/2017 - CT dated 28.06.2017?

Prima facie, it is observed that while the first query relating to classification of services gets covered under Section 97(2)(a) of the CGST Act, 2017, the other two queries appear to be relating to applicability of a notification, which gets covered under Section 97(2)(b) of the CGST Act, 2017, and accordingly, the application is liable for admission.

7.3 From the submissions made and document furnished by the applicant at the time of filing the application and during the personal hearing and thereafter, it is seen that the technical specification of the project to be carried out has been mentioned as "Reclamation of Existing Dump Yard located at Compost Yard by Removing the Legacy Waste in Ariyalur Municipality". The authorized representative of the applicant explained during the personal hearing that their work includes excavation, screening, shredding and scientific disposal of the legacy

waste. In this regard, the relevant extracts of the 'Swachh Bharat Mission (Urban) 2.0' of the Ariyalur Municipality, as furnished by the AR, are as follows :-

**“10. Minimum Qualifying Criteria:-**

*The applicant / bidder shall fulfill following Minimum Qualifying Criteria*

**a) Technical Eligibility:**

*The Bidder should have, undertaken at least one similar nature of work such as removal of dumped legacy waste / processing of solid waste of 16055 cum through bio-mining process anywhere in India in any organization.*

**Section III. Terms of Reference**

**1. Scope of Work**

*1.1 RECLAMATIONS OF EXISTING DUMP YARD LOCATED AT COMPOST YARD BY REMOVING THE LEGACY WASTE IN ARIYALUR MUNICIPALITY*

*1.2 Processing plant/ legacy waste removal plant shall be operated and maintained by the Concessionaire by fulfilling all the statutory provisions and the cost of built design, installation, operation, maintenance in this plant shall be solely borne by the Concessionaire at his/ her own cost.*

**10. Work Plan**

*The proposed work involves selection and engagement of an interested and capable Private Entrepreneur for excavating the compact mixed garbage dumped over 20 years which underwent partial biological degradation, by using suitable Mechanical excavators, stabilizing the biodegradable wastes by insitu windrow composting and use of appropriate mechanical screens to sieve the excavated and processed materials into recoverable fractions such as recyclables (metal and glass), fine fraction (soil/compost), coarse fractions (incinerables such as plastics, textile, tyre, rubber etc), inerts (stone, bricks, construction debris) and hazardous wastes (batteries, containers of toxic materials, tube lights etc) in the assigned land areas on Design, Build, Own and Operate (DBOO) concept so as to retrieve and recover materials by segregating, sorting, diverting for recycling the excavated materials and safe disposal of residues at approved disposal facilities. It will involve*

• —.”

And the bidder/concessionaire is expected to hand over the cleared site back to the Ariyalur Municipality on completion of the process.

7.4 In common parlance, the term 'Legacy Waste', refers to the wastes collected and kept for years on any barren land or on a dedicated landfill, and the term 'Bio mining' refers to an environment friendly technique to separate soil and recyclables like plastic, metal, paper, textiles, Construction & Demolition waste materials and other solid materials from legacy waste. From the scope of work involved in the instant case, we find that the applicant is involved in 'reclamation of

an existing dump yard and 'disposal of the output (Waste fractions) from the processing operation', whereby the applicant is expected to process approximately 16,055 cubic meters of legacy waste.

7.5 Accordingly, it becomes clear that the applicant is a Solid Waste Management company which offers solutions involving segregation, treatment, recycling of Legacy Waste and thus clearing and reclaiming the landfills. In the process, the applicant is also expected to dispose of the waste fractions from the processing operation scientifically in compliance with the applicable legal provisions. In short, applicant is seen to have been involved in 'Waste treatment and disposal services', and 'Site Remediation Services'. Under these circumstances, the applicant has sought a ruling on the classification of services provided by them.

7.6 Notification No.11/2017 Central Tax (Rate), dated 28.06.2017 specifies the rates of GST for services, and it is seen that description of service in respect of SAC 9994 is "Sewage and waste collection, treatment and disposal and other environmental protection services" which is chargeable to GST at 18% (CGST-9% + SGST-9%, or IGST-18%). On examining the relevant extract of the 'Scheme of Classification of Services' under GST notified as Annexure to Notification No.11/2017 Central Tax (Rate), dated 28.06.2017, the following sub-classification under Heading 9994 is observed :-

<b>Heading 9994</b>		<b>Sewage and waste collection, treatment and disposal and other environmental protection services</b>
Group 99943		Waste treatment and disposal services
	999431	Waste preparation, consolidation and storage services
	<b>999432</b>	<b>Hazardous waste treatment and disposal services</b>
	<b>999433</b>	<b>Non-Hazardous waste treatment and disposal services</b>
Group 99944		Remediation Services
	<b>999441</b>	<b>Site remediation and clean-up services</b>
	999442	Containment, control and monitoring services and other site remediation services
	999443	Building remediation services
	999449	Other remediation services nowhere else classified

7.7 As could be seen from the above, 'Site remediation' in the instant case gets covered under Group 99944, and more specifically under SAC 999441, as the

applicant is assigned with the task of "Reclamation of Existing Dump Yard located at Compost Yard by Removing the Legacy Waste in Ariyalur Municipality". However, the objective of the project is not just land reclamation or 'Remediation Services', but also bio mining of waste, which involves processing of waste and disposal of the same as well. Therefore, this part of the operation gets covered under Group 99943, and more specifically under SAC 999432, which relates to 'Hazardous waste treatment and disposal services', and under SAC 999433 relating to 'Non-hazardous waste treatment and disposal services'. Accordingly, we are of the opinion that the entire operation undertaken by the applicant in this case gets covered broadly under heading 9994, attracting 18% GST.

7.8 Moving on to the second query relating to the exemption provided under Sl. No.3 of the Notification No.12/2017 – CT dated 28.06.2017, as amended, it is seen that the entry at Sl.No.3 of the said Notification, reads as below :-

Sl. No.	Chapter, Section, Heading, Group or Service Code (Tariff)	Description of Services	Rate (per cent.)	Condition
3	99	Pure services (excluding works contract service or other composite supplies involving supply of any goods) provided to the Central Government, State Government or Union territory or local authority or a Governmental authority by way of any activity in relation to any function entrusted to a Panchayat under article 243G of the Constitution or in relation to any function entrusted to a Municipality under article 243W of the Constitution.	Nil	Nil

From the above, it is observed that in order to be eligible for exemption under the said category of service, the following conditions are required to be satisfied, viz.,

- The services must be pure services;
- The services should be provided to Central Government, State Government or Union Territory, a local authority or a governmental authority;
- The pure services must be by way of any activity in relation to any function entrusted to a Panchayat under article 243G of the Constitution or in relation to any function entrusted to a Municipality under article 243W of the Constitution.

7.9 As revealed from the details/documents furnished by the applicant, and in view of the detailed discussions above, it is quite evident that the service 'Site remediation, bio-mining and disposal of waste', does not fall under the category of either 'Works Contract', or 'Composite supplies'. Further, as no supply of any goods is involved in the instant case, and as said operation gets carried out by deployment of manpower/labour, it is clear that the service rendered by the applicant qualifies as 'pure services'.

7.10 Apart from being 'Pure services', it is also to be seen whether the said services are provided to Central Government, State Government or Union Territory, a local authority or a governmental authority. We find that Section 2(69) of the CGST Act, 2017, defines "local authority", as follows:-

*(69) "local authority" means—*

*(a) a "Panchayat" as defined in clause (d) of article 243 of the Constitution;*

***(b) a "Municipality" as defined in clause (e) of article 243P of the Constitution;***

*(c) a Municipal Committee, a Zilla Parishad, a District Board, and any other authority legally entitled to, or entrusted by the Central Government or any State Government with the control or management of a municipal or local fund;*

*(d) a Cantonment Board as defined in section 3 of the Cantonments Act, 2006;*

*(e) a Regional Council or a District Council constituted under the Sixth Schedule to the Constitution;*

*(f) a Development Board constituted under article 371 of the Constitution; or*

*(g) a Regional Council constituted under article 371A of the Constitution;*

Accordingly, we find that the Ariyalur Municipality qualifies as a "local authority" under Section 2(69) of the CGST Act, 2017, and therefore the services are provided to a 'local authority' by the applicant in the instant case.

7.11 The next criterion to be verified is whether the activity is a function entrusted to the Municipality. In this regard, it is observed that the 12th Schedule to Article 243W of the Indian Constitution deals with the provisions that specify the powers, authority and responsibilities of Municipalities, which is as listed below :-

1. *Urban planning including town planning.*
2. *Regulation of land-use and construction of buildings.*
3. *Planning for economic and social development.*
4. *Roads and bridges.*
5. *Water supply for domestic, industrial and commercial purposes.*
6. ***Public health, sanitation conservancy and solid waste management.***
7. *Fire services.*
8. *Urban forestry, protection of the environment and promotion of ecological aspects.*
9. *Safeguarding the interests of weaker sections of society, including the handicapped and mentally retarded.*
10. *Slum improvement and upgradation.*

11. Urban poverty alleviation.
12. Provision of urban amenities and facilities such as parks, gardens, playgrounds.
13. Promotion of cultural, educational and aesthetic aspects.
14. Burials and burial grounds; cremations, cremation grounds; and electric crematoriums.
15. Cattle pounds; prevention of cruelty to animals.
16. Vital statistics including registration of births and deaths.
17. Public amenities including street lighting, parking lots, bus stops and public conveniences.
18. Regulation of slaughter houses and tanneries.

The services in question are covered under Sl.No.6 of Article 243 W of the Constitution of India i.e., 'Public health, sanitation conservancy and solid waste management'. Further, it is seen that as per the Solid Waste Management Rules, 2016, the duties of local authorities are given under Rule 15. Sub-clause (zj) to Rule 15 reads as –

*“investigate and analyze all open dumpsites and existing operational dumpsites for their potential bio-mining and bio-remediation and wheresoever feasible, **take necessary actions, to bio-mine or bio-remediate the sites;**”*

7.12 We therefore find that the services rendered by the applicant in the instant case happens to be 'Pure Services' provided to Ariyalur Municipality which is a 'Local Authority', by way of any activity in relation to any function entrusted to a Municipality under article 243W of the Constitution. Accordingly, we conclude that the services provided by the applicant to the Ariyalur Municipality is exempted under Sl.No.3 of Notification 12/2017 dated 28.07.2017, as amended.

7.13 The third query raised by the applicant is *“Whether the service recipient i.e., M/s. Ariyalur Municipality is a “Governmental Authority” as per the definition of Notification No.12/2017 – CT dated 28.06.2017?”*. We find that under this query, the applicant has sought a clarification on M/s. Ariyalur Municipality, who is the service recipient, and not the applicant in the instant case. In this regard, we are of the opinion that this query need not be answered, in view of the fact that it does not relate to the applicant, who is the service provider in this case. It may be noted that the definition of 'advance ruling' as laid down in Section 95(a) of the CGST Act, 2017, spells out in clear terms that it means a decision provided by the Authority in relation to supply undertaken by the applicant, and it runs as follows :-

*“(a) **“advance ruling”** means a decision provided by the Authority or the Appellate Authority to an applicant **on matters or on questions specified in sub-section (2) of section 97** or sub-section (1) of section 100 or of section 101C, **in relation to the supply** of goods or services or both **being undertaken or proposed to be undertaken by the applicant;**”*

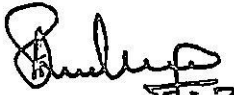
As it is clear that the instant query is not in respect of a supply undertaken by the applicant, no advance ruling is required to be pronounced in this case. Further,

this query does not in any case get covered under any of the clauses from (a) to (g) of Section 97(2) of the CGST Act, 2017, for which an advance ruling can be sought.


8. In view of the above, we rule as under -

**RULING**

- (i) The service provided by the applicant, i.e., bio-mining of waste and remediation of site gets covered under SAC 9994, attracting GST at 18% (9%-CGST + 9%-SGST, or 18%-IGST);
- (ii) The service provided by the applicant to M/s. Ariyalur Municipality is exempted in terms of Sl. No.3 of the Notification No.12/2017 - CT dated 28.06.2017, as amended;
- (iii) The question is not covered under Section 97(2) of the CGST/TNGST Act, 2017, in respect of which an applicant can seek advance ruling and hence this authority refrains from giving any ruling in this regard.

  
27/02/2026  
(B. Suseel Kumar)  
Member (SGST)



  
27/02/2026  
(C. Thiyagarajan)  
Member (CGST)

**To**

M/s. Gorantla Geosynthetics Limited,  
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Chennai - 600 034.

**/By Speed Post/**

**Copy submitted to :**

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26/1, Uthamar Mahatma Gandhi Road,  
Nungambakkam, Chennai 600 034.
2. The Commissioner of Commercial Taxes,  
2<sup>nd</sup> Floor, Ezhilagam, Chepauk, Chennai 600 005.
3. The Commissioner of GST and Central Excise,  
Chennai-North Commissionerate,  
No.26/1, Mahatma Gandhi Road,  
Nungambakkam, Chennai - 600 034.

**Copy to :**

1. The Assistant Commissioner (ST),  
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No.1, Greems Road, Chennai - 600 006.
2. Master File/ Spare - 2.