

**GIB/MH/COLO COLOR/24.03.2019/AAR-210**

**Advance Ruling Category :** Classification

**State :** Maharashtra

**Order No.:** GIB/MH/COLO COLOR/24.03.2019/AAR-210

**Name of Entry :**

Colo Color

**Date :** 24-03-2019

**Breif Issue :**

**Issue & Fact of the Case:**

Whether the activity of merely printing or reproducing the content given by the photographers/retail customers on pen drive, cd, memory card or any other storage media will be classifiable under service code 998912 or 998386?

The applicant is a multifaceted retail, wholesale and institutional sales company that offers a range of products, solutions, services and equipment related to digital printing.

Applicant submits that there are two competing entries for classification of the activity of printing services carried out by the applicant.

As per **Entry no 27 of N/N 11/2017 Central Tax (Rate)** dated 28.06.2017 as amended by N/N 20/2017 Central Tax (Rate) dated 22.08.2017 SAC Code 998912 as “Printing and reproduction services of recorded media, on a fee or contract basis” is taxable at CGST 9%.

The Applicant submits that other relevant SAC for the classification of the activity is under SAC 998386 as “Photographic and video graphic processing services” falling under SAC 9983 are liable to CGST at 9% under **Entry 21 of N/N 11/2017 Central Tax (Rate)** dated 28.06.2017.

CBIC circular dated 1.01.2019 has clarifies that color printing of images from film or digital media is covered under SAC 998386.

**Decision of Advance Ruling Authority :**

**Decision:**

The activity of merely printing or reproducing the content given by the photographers/ retail customers on pen drive, cd, memory card or any other storage media will be classifiable under service code 998386 and liable to tax @18% (9% each CGST and SGST).