



भारत सरकार /Government of India
वित्त मंत्रालय राजस्व विभाग
Ministry of Finance, Department of Revenue
कार्यालय आयुक्त /Office of the Commissioner
सी.जी.एस.टी एवं केंद्रीय उत्पाद शुल्क
Central Goods Service Tax and Central Excise (CGST & CX)
२९, भरतपुरी प्रशासनिक क्षेत्र २९, Administrative Area, Bharatpuri
उज्जैन (मप्र)-४५६०१०/Ujjain (MP)-456010.

F.No. I(Gen) 19-04/GST/Trade Notice /18-19

Ujjain, Dated. 28.01.2019

व्यापार सूचना संख्या /Trade Notice No. 42/2018-19

उज्जैन दिनांक/Ujjain, Dated 28.01.2019

Subject: Clarification on issue of classification of service of printing of pictures covered under 998386- reg.

Attention of the Trade and Industry is invited to the Circular No. 84/03/2019-GST dated 01.01.2019 issued under F. No. 354/428/2018 -TRU by the Technical Officer TRU Ministry of Finance, Department of Revenue, Tax Research Unit New Delhi in respect of "Clarification on issue of classification of service of printing of pictures covered under 998386" (Copy enclosed).

2. The contents of the aforesaid Circular may please be brought to the notice of members of your association in particular and public in general.

Encls: As above.

(Dr. Sandeep Srivastava)

प्रधान आयुक्त

F. No. 354/428/2018-TRU

Government of India
Ministry of Finance
Department of Revenue
Tax research Unit

Room No. 146G, North Block,
New Delhi, the 1st January 2019

To,

The Principal Chief Commissioners/ Chief Commissioners/ Principal
Commissioners/ Commissioner of Central Tax (All) /
The Principal Director Generals/ Director Generals (All)

Madam/Sir,

Subject: Clarification on issue of classification of service of printing of pictures
covered under 998386- reg.

It has been brought to the notice of the Board that the service of "printing of pictures" correctly covered under service code 998386 - "Photographic and videographic processing services" is being classified by trade under service code 998912 - "Printing and reproduction services of recorded media, on a fee or contract basis". The two service codes attract different GST rate of 18% and 12% respectively and therefore wrong classification may lead to short payment of GST.

2. The matter has been examined. According to Explanatory Notes to the scheme of classification of services, the service code **"998386 Photographic and videographic processing services, includes, -**

developing of negatives and the printing of pictures for others according to customer specifications such as enlargement of negatives or slides, black and white processing; colour printing of images from film or digital media; slide and negative duplicates, reprints, etc.; developing of film for both amateur photographers and commercial clients; preparing of photographic slides; copying of films; converting of photographs and films to other media"

3. Further, according to explanatory notes, the service code 998912 "Printing and reproduction services of recorded media, on a fee or contract basis" clearly excludes, -
*colour printing of images from film or digital media, cf. 998386,
-audio and video production services, cf. 999613"*

4. In view of the above, it is clarified that service of "printing of pictures" falls under service code **"998386: Photographic and videographic processing services"** and not

under "998912: *Printing and reproduction services of recorded media, on a fee or contract basis*" of the scheme of classification of service annexed to notification No. 11/2017-Central Tax(Rate) dated 28.06.2018. The service of printing of pictures attracts GST @ 18% falling under item (ii), against serial number 21 of the Table in notification No. 11/2017-Central Tax(Rate) dated 28.06.2018.

5. Difficulty if any, in the implementation of this circular may be brought to the notice of the Board.

Yours Faithfully,

Harsh Singh
Technical Officer (TRU)
Email: harshsingh.irs@gov.in