18% GST on making Bullet Proof Bodybuilding on Motor Vehicles having Tarpaulin cover in Cargo Compartment: AAR

Fact of the Case

- The applicant, M/s Jeet & Jeet Glass and Chemicals Pvt. Ltd. is engaged in the manufacture of Bullet proof glass, bulletproof Vehicles, Lectern, etc in their factory. Besides, the applicant is also undertaking to armor by bodybuilding on the chassis of vehicles supplied by the customers mainly the army/police, etc. using bullet-proof steel and glass.
- The vehicles of 2.5Ton or higher capacity owned by the customer (army/police) are supplied to the applicant and these vehicles have either metal (partial or full) or partially metal and partially Tarpaulin covered cargo compartments.

The applicant sought the advance ruling on the issue in respect of the classification of activity of making bullet proof body building on motor vehicles as goods or services or both.

Decision of the Case

• The Coram ruled that the activity carried out by the applicant by making bullet proof body building in addition to fixing bullet proof windshield glass, bullet proofing of engine and fuel tank) on the motor vehicles (2.5 Ton capacity) of Chapter heading 87 of the Customs Tariff Act, 1975, supplied by the customer (i.e. free supply) having Tarpaulin cover in the cargo compartment, is a supply of Service attracting GST 18%.

The Rajasthan Authority of Advance Ruling (AAR) ruled that 18% GST is applicable on the activity carried out by making bullet proof body building on motor vehicles having Tarpaulin cover in the cargo compartment.