

	KERALA AUTHORITY FOR ADVANCE RULING GOODS AND SERVICES TAX DEPARTMENT TAX TOWER, THIRUVANANTHAPURAM	
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**BEFORE THE AUTHORITY OF : Shri.Jomy Jacob, IRS &
: Shri. Mansur. M. I.**

Legal Name of the applicant	CSM Universe Pvt Ltd
GSTIN	32AALCC2042C1ZC
ARN	AD3206250166366
Address	40/1873, Vasudeva Complex, Second Floor, Civil Line Road, Palarivattom, Ernakulam, Kerala – 682025
Advance Ruling sought for	(i) What is the applicable GST rate on the product “Turmeric Extract / Curcuma Elixir”? (ii) Whether the MRP of Rs. 4,990/- (being below Rs. 5,000/-) has any bearing on the applicable GST rate?
Date of Personal Hearing	05.01.2026
Authorized Representative	Shri. Abin Roy, Marketing Manager

ADVANCE RULING No.KER/15/2026 Dated 07/08/2026

1. M/s CSM Universe Private Limited (hereinafter referred to as “the applicant”) is a company registered under the provisions of the Companies Act, 2013 and holding GSTIN 32AALCC2042C1ZC. The applicant has sought an advance ruling under Section 97 of the Central Goods and Services Tax Act, 2017 and the Kerala Goods and Services Tax Act, 2017. The applicant is engaged in the manufacture and supply of a product described as “Turmeric Extract / Curcuma Elixir”, which is proposed to be marketed as a nutraceutical wellness supplement.



2. At the outset, it is clarified that any reference hereinafter to the provisions of the CGST Act, the Rules and Notifications issued thereunder shall also include a reference to the corresponding provisions of the KGST Act, the Rules and Notifications issued thereunder.

3. Contentions of the Applicant

3.1 The applicant is engaged in the manufacture of "Turmeric Extract/ Curcuma Elixir." As submitted, the manufacturing process involves sourcing turmeric rhizomes (*Curcuma longa*), followed by cleaning, drying, and extraction through steam distillation to retain essential curcuminoid content. The product is extracted using a natural steam distillation method to ensure high potency and purity while preserving the natural properties of turmeric. The product is stated to contain turmeric extract with high moisture content and without the addition of synthetic additives or preservatives.

3.2 The applicant submits that the product is intended to be marketed as a nutraceutical wellness supplement and consumed as a dietary supplement for anti-inflammatory, antioxidant, and immune-boosting benefits, and to support joint health, liver function, and overall well-being. It is contended that the product is medicinal in nature and capable of providing therapeutic benefits.

3.3 The applicant submits that the product is manufactured using natural ingredients without synthetic chemicals and should therefore be treated as a medicament rather than a wellness supplement. It is further contended that, since the product possesses health-protective and potentially life-saving properties, it merits classification under the category of medicaments taxable at 5% GST.

3.4 Subsequently, the taxpayer vide letter dated 20.02.2026 submitted that the product in question was manufactured through a controlled, food-grade processing method intended for preparation of a consumable herbal health supplement. It was submitted that fresh turmeric rhizomes were procured from approved suppliers and were thoroughly cleaned using water. The cleaned turmeric was cut into small pieces, mixed with water, and transferred to a



closed stainless-steel processing vessel under hygienic conditions. The Applicant stated that water and turmeric were boiled together to transfer their natural beneficial components into the collected liquid medium, following the traditional Ayurvedic water-based preparation method known as "Arkakalpana." The liquid obtained from this process was collected and used as the final ingredient of the health supplement.

3.5 The Applicant further submitted that during the entire manufacturing process, no essential oil was separated or recovered, no fragrance or flavour was extracted, and no aromatic substance was concentrated or marketed separately. It was stated that the collected liquid was filtered and handled in a controlled hygienic environment in accordance with food safety standards. The filtered product was directly filled into sealed retail bottles without the addition of preservatives, artificial colours, flavours, or chemicals. The finished product was labelled with clear dosage instructions and was supplied for direct human consumption.

3.6 With regard to regulatory compliance, the Applicant submitted that the product was manufactured and marketed under a valid licence issued by the Food Safety and Standards Authority of India (FSSAI). It was stated that the licence categorised the unit under the business type "Manufacturer-Food / Health Supplements and Nutraceuticals." The product was classified under Food Category 13-Foodstuffs intended for particular nutritional uses, Sub-category 13.6-Food Supplements, and described as "Nutraceutical- Curcuma Longa Extract (Without Additives) -Liquid." The Applicant submitted that all manufacturing, storage, labelling, and sale activities were carried out in compliance with applicable food safety regulations. It was also submitted that the Applicant did not hold any licence for manufacture of essential oils, perfumes, fragrances, flavouring agents, or cosmetic products. A copy of the FSSAI Central Manufacturing Licence was stated to have been enclosed.

3.7 The Applicant further submitted that the product had been tested by NABL-accredited laboratories. It was stated that the laboratory reports confirmed compliance with microbiological safety standards, absence of heavy



metals, and non-detection of synthetic preservatives, added colours, steroids, or prohibited substances. The Applicant submitted that active turmeric constituents were present and that the moisture content was approximately 99.91%, indicating a predominantly water-based composition. It was contended that the laboratory reports established that the product met food safety and quality requirements for human consumption. Copies of the laboratory reports were stated to have been enclosed.

3.8 Regarding the nature and intended use of the product, the Applicant submitted that the product was manufactured, packed, and marketed as a nutraceutical / health supplement. It was supplied in retail packs with dosage instructions and was intended for daily consumption for wellness and nutritional support. It was specifically contended that the product was not manufactured, marketed, or supplied for use in perfumery, cosmetics, or flavoring applications.

3.9 Based on the manufacturing process adopted, the valid FSSAI licensing, the laboratory analysis confirming food safety and water-based composition, and the intended use for direct human consumption, the Applicant contended that the product was clearly a food-grade nutraceutical / health supplement. Accordingly, the Applicant submitted that the product was appropriately classifiable under HSN 2106 as a food preparation / food supplement / nutraceutical product and not as an essential oil, aqueous distillate of essential oil, fragrance, or odoriferous preparation.

3.10 The Applicant requested that the above submissions be taken into consideration and stated that it remained available for any further clarification or documentation as may be required.

The Applicant also enclosed the following documents:

- (1) Copy of FSSAI Central Manufacturing Licence;
- (2) NABL Pesticide Residue, Chemical & Nutritional Analysis Test Report; and
- (3) Microbiological Test Report.



4. Comments of the Jurisdictional Officer:

The application was forwarded to the jurisdictional officer as per provisions of section 98 (1) of the CGST Act. The Jurisdictional officer has not submitted any remarks and hence it is presumed that the jurisdictional officer has no specific comments to offer. It is also construed that no proceedings are pending on the issue against the applicant.

5. Personal Hearing:

5.1 The applicant was granted opportunity for personal hearing on 05.01.2026 through Virtual Mode. Shri. Abin Roy, Authorized representative of the company appeared and submitted the facts and circumstances of the case.

5.2 The applicant, reiterated the facts already stated in the advance ruling application filed in Form GST ARA-01. The applicant submitted that no additional facts or documents. It was reiterated that the product continues to be manufactured using turmeric rhizomes through steam distillation, contains only natural ingredients without synthetic additives and is marketed as a wellness supplement intended to support immunity, joint health and overall well-being.

5.3 The applicant further reiterated its contention that turmeric has recognized medicinal properties under traditional systems of medicine and therefore the product should be treated as a nutraceutical supplement and should be classifiable under heading 2106.

5.4 Subsequent to the personal hearing, the applicant vide letter dated 20.02.2026 furnished a written clarification regarding the manufacturing process, FSSAI licensing and laboratory test results, as recorded at paras 3.4 to 3.6 above.

6. Discussion and Conclusion:

6.1 We have carefully examined the application, the submissions made by the applicant, the documents placed on record and the relevant statutory provisions. The questions raised for determination are:



- (i) What is the applicable GST rate on the product "Turmeric Extract / Curcuma Elixir"?
- (ii) Whether the MRP of Rs.4,990/- (being below Rs.5,000/-) has any bearing on the applicable GST rate?

The questions raised relate to classification of goods, applicable rate of GST, and the relevance of MRP for determination of the rate of tax. These questions fall within the ambit of Section 97(2)(a) of the CGST/KGST Acts. Accordingly, this Authority has jurisdiction to pronounce a ruling on the application.

6.2 The applicant is engaged in the manufacture and supply of a product marketed as "Turmeric Extract / Curcuma Elixir." From the application, supporting documents and submissions made during personal hearing, it is observed that the product is manufactured from turmeric rhizomes through steam distillation. The applicant submits that the product contains only natural ingredients and is marketed as a wellness supplement intended to support immunity, joint health and overall well-being.

6.3 The chemical examination report dated 20.11.2025 produced on record indicates that the impugned product is an aqueous distillate obtained through steam distillation, containing only a minuscule trace of curcumin and consisting of approximately 99.9% moisture/water. The product is therefore essentially a highly diluted water-based preparation derived from turmeric.

6.4 It is relevant to note that the applicant's own stance on classification has evolved in the course of these proceedings. In the original application, the applicant contended that the product, being manufactured from natural ingredients and possessing health-protective and potentially life-saving properties, merits classification as a medicament under Chapter 30, taxable at 5% GST (para 3.3 supra). Subsequently, vide additional written submissions dated 20.02.2026 (paras 3.4 and 3.5 supra), the applicant revised this position, submitting that the product is manufactured through the traditional Ayurvedic water-extraction process ("Arkakalpana"), is held under a valid FSSAI Central Manufacturing Licence as a nutraceutical/food supplement under Food Category 13.6 and is accordingly appropriately classifiable under Heading 2106



as a food preparation and not under Chapter 33 as an essential oil or odoriferous preparation. In view of this shift, both contentions raised by the applicant, classification as a medicament under Chapter 30, and classification under Heading 2106, together with the alternative possibility of classification under Chapter 33, is examined hereunder.

6.5 The core issue for determination is whether the product qualifies as a "medicament" classifiable under Chapter 30 of the Customs Tariff or as a nutraceutical / food supplement classifiable under Heading 2106 or as aqueous distillates or hydrosols potentially falling under Chapter 33. The HSN Explanatory Notes to Chapter 30 clarify that medicaments are products consisting of substances used for therapeutic or prophylactic purposes, put up in measured doses or in forms or packings for retail sale. The Notes expressly exclude preparations intended for maintaining general health or well-being, including food supplements and nutraceuticals. The essential test is whether the product is meant for diagnosis, treatment or prevention of a specific disease.

6.6 Medicaments are ordinarily supported by therapeutic claims, dosage discipline and regulatory recognition as drugs. The applicant has not produced any licence issued under the Drugs and Cosmetics Act, 1940, nor any evidence to indicate that the product is prescribed or recognized in medical practice as a medicament. This is a relevant factor while applying the common parlance and functional tests.

6.7 It is a well-settled position of law that the mere presence of ingredients possessing medicinal properties does not, by itself, render a product classifiable as a medicament. The classification of a product is to be determined based on its primary function, essential character, and the manner in which it is understood in common trade parlance and by the consuming public. In matters of classification, reliance is to be placed on the popular meaning and the understanding attached to the product by those who deal with and use it, rather than on its scientific or technical attributes. The Hon'ble Supreme Court of India, inter alia, in Puma Ayurvedic Herbal (P) Ltd. v. Commissioner of Central Excise and Commissioner of Central Excise v. Baidyanath Ayurved Bhawan Ltd., has consistently held that the common parlance test and the primary use



of the product are decisive factors in classification matters and that products consumed for general health or well-being cannot be treated as medicaments merely because they contain ingredients known to possess therapeutic properties. For a product to be classified as a medicament under Chapter 30, it must ordinarily be understood in the market as a preparation intended for the diagnosis, treatment or prevention of a specific disease or ailment and it is generally consumed for a limited duration until the condition is cured or controlled. In the present case, the product "Curcuma Elixir" is marketed and consumed as a wellness supplement intended for general health, immunity and vitality. It is neither prescribed for the treatment of any specific disease nor consumed for a defined therapeutic course. Applying the aforesaid principles, it is evident that the impugned product is intended for general wellness and health maintenance rather than for the treatment or prevention of any specific ailment and therefore it does not satisfy the essential criteria for classification as a medicament under Chapter 30 of the Customs Tariff.

6.8 Heading 2106 covers "Food preparations not elsewhere specified or included." The HSN Explanatory Notes to this heading specifically include dietary or food supplements consisting of plant extracts or other substances, presented in liquid or other forms, and intended for general health maintenance. Such products are distinguished from medicaments by the absence of specific therapeutic or curative claims. FSSAI is an autonomous body also created under the Ministry of Health and Family Welfare and is responsible for protecting and promoting public health through the regulation and supervision of food safety. The applicant is a license holder under FSSAI and the licence categorises the impugned product under Category 13 – Foodstuffs intended for particular nutritional uses, sub-category 13.6 – Food supplements.

6.9 In the present case, the applicant themselves describe the product as a nutraceutical wellness supplement. The claims made relate to immune support, antioxidant properties and overall wellness. The product is presented as a consumable preparation containing curcumin and other ingredients known for their antioxidant and immunity-supporting properties. The label claims and promotional materials indicate that the product is intended to promote immune



support, provide antioxidant benefits and enhance overall wellness. These claims are generic in nature and are commonly associated with dietary supplements. However, the chemical examination report indicates that the product consists of approximately 99.9% moisture/water with only trace quantities of curcumin and therefore the claimed curcumin based health benefits are not substantiated by the actual composition of the product. There is no claim to suggest that the product is meant to diagnose, treat, cure or prevent any specific disease or medical condition. The absence of such specific therapeutic claims is a significant factor in distinguishing the product from a medicament under Chapter 30 of the Customs Tariff.

6.10 It is also a settled principle of tariff classification that the essential character and principal use of the product must be taken into account while determining the appropriate heading. In the present case, the product is manufactured, packed and supplied in retail bottles with dosage instructions and is intended for direct human consumption as a dietary supplement for general wellness and nutritional support. The manufacturing process described by the applicant shows that the product is essentially a water based extract of turmeric, containing negligible quantities of turmeric derived constituents and consisting predominantly of water. In trade and commercial parlance, such products are understood and marketed as nutraceutical or dietary supplements rather than as pharmaceutical preparations or aromatic extracts. Therefore, considering the composition, manner of presentation, intended use and consumer perception, the essential character of the impugned product is that of a food preparation meant for nutritional or wellness supplementation, which appropriately falls within the scope of Heading 2106.

6.11 The possibility of classification under Chapter 33 of the Customs Tariff Act, 1975 also requires examination. Chapter 33 covers essential oils, resinoids and related products including aqueous distillates and aqueous solutions of essential oils falling under Heading 3301. As per the HSN Explanatory Notes, such aqueous distillates (commonly known as hydrosols or aromatic waters) are classifiable under this heading when they retain the aromatic or odoriferous character of essential oils and are generally traded or used in perfumery,



cosmetics, flavouring or similar preparations. In the present case, the manufacturing process described by the applicant indicates that no essential oil is extracted or separated during production. Further, the chemical examination report shows that the product consists predominantly of water (approximately 99.9%) with only negligible traces of turmeric derived constituents and does not possess the essential character of an aromatic or odoriferous preparation. The product is also not marketed or used as a perfumery, cosmetic or flavouring preparation but is supplied for direct human consumption as a nutraceutical / wellness supplement. Accordingly, classification of the impugned product under Chapter 33 is not sustainable.

6.12 In light of the foregoing discussion, we hold that the impugned product, which is intended to be used as a wellness supplement, is appropriately classifiable as a nutraceutical / dietary supplement under Heading 2106 as a food preparation not elsewhere specified or included. The product is neither classifiable as a medicament under Chapter 30 nor as an essential oil or aromatic preparation under Chapter 33. Accordingly, the product is classifiable under HSN 2106 and was taxable at the rate of 18% (9% CGST +9% SGST) under Sl. No. 23 of Schedule III of Notification No. 1/2017-Central Tax (Rate) dated 28.06.2017, as amended vide Notification No. 41/2017-Central Tax (Rate) dated 14.11.2017, issued under the Central Goods and Services Tax Act, 2017.

6.13 It is also relevant to note that, pursuant to the recommendations of the GST Council under the GST 2.0, the rate structure under Notification No. 1/2017-Central Tax (Rate) was amended vide Notification No. 9/2025-Central Tax (Rate) dated 17.09.2025, effective from the notified date. As per the Notification, goods falling under HSN 2106- "Food preparations not elsewhere specified or included [other than pan masala]" are taxable at the rate of 5%.

6.14 With respect to the applicant's argument regarding the MRP of Rs.4,990/-, it is observed that GST classification and rate determination are based on the nature and tariff classification of goods as per the Customs Tariff and the rate notifications. Price or MRP by itself does not determine classification unless a specific conditional entry in the notification links the rate



to value thresholds. No such value-linked entry is applicable to goods classifiable under Heading 2106 in the present case. Therefore, the MRP of Rs. 4,990/- has no independent relevance in determining the classification or applicable GST rate.

7. In view of the observations stated above, the following rulings are issued.

RULING

Question:- (i) What is the applicable GST rate on the product "Turmeric Extract / Curcuma Elixir"?

Ruling: The product "Turmeric Extract / Curcuma Elixir" is classifiable as a nutraceutical / dietary supplement under Heading 2106. Accordingly, it was taxable at 18% GST up to the date of amendment in terms of Notification No. 01/2017-Central Tax (Rate) dated 28.06.2017, as amended. Pursuant to the rate revision brought in by Notification No. 9/2025-Central Tax (Rate) dated 17 September 2025, effective from 22 September 2025, the applicable GST rate stands reduced to 5%.

Question:- (ii) Whether the MRP of Rs. 4,990/- (being below Rs. 5,000/-) has any bearing on the applicable GST rate?

Ruling: The MRP of Rs. 4,990/- has no bearing on the classification or applicable GST rate. GST is determined based on tariff classification and rate notifications, not on price, unless specifically linked to a value-based condition, which is not applicable here.



Jomy Jacob, IRS

**Addl. Commissioner of Central Tax
Member**




Mansur M.I.

**Joint Commissioner of State Tax
Member**



To

CSM Universe Pvt Ltd,
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Palarivattom, Ernakulam, Kerala - 682025.

Copy submitted to

1. The Chief Commissioner of Central Tax and Central Excise, Thiruvananthapuram Zone, C.R.Building, I.S.Press Road, Cochin- 682018. [E-mail ID: cccochin@nic.in; ccu-cexcok@nic.in].
2. The Commissioner of State Goods and Services Tax Department, Tax Towers, Karamana, Thiruvananthapuram - 695002. [E-mail ID: cst.sgst@kerala.gov.in]
3. The Commissioner of Central Tax and Central Excise, Kochin Commissionerate.
4. The Commissioner of Central Tax and Central Excise, Thiruvananthapuram Commissionerate, GST Bhavan, Statue, Thiruvananthapuram. (E-mail id: commr-tvmhqs@gov.in)
5. The Commissioner of Central Tax and Central Excise, Calicut Commissionerate.

Copy to :

1. The Additional Commissioner, TPS, HQ, Thiruvananthapuram.
2. The Deputy Commissioner, ITMD, Thiruvananthapuram.
3. The Superintendent, Central Tax, Ernakulam Division, Ernakulam Range-I.

