



::आयुक्त (अपील्स) का कार्यालय, केन्द्रीय वस्तु एवं सेवा कर और उत्पाद शुल्क:: O/O THE COMMISSIONER (APPEALS), CENTRAL GST & EXCISE,

द्वितीय तान, जी एस टी अवन / 2rd Floor, GST Bhavan. रेस कोस रिंग रोड, / Race Course Ring Road,



राजकोट / Rajkot - 360 001

Tele Fax No. 0281 - 2477952/2441142 Email: cexappealsrajkot@gmail.com

रजिस्टई डाक ए. डी. द्वारा :-

Appeal / File No.

V2/24/BVR/2017

मून अदेश सं / 010 No. दिलाक /

Date

R/68/2016

28.12.2016

ज अपील आदेश संख्या (Order-In-Appeal No.):

BHV-EXCUS-000-APP-098-2017-18

आदेश का दिनांक / Date of Order:

24.01.2018

जारी करने की तारीख / Date of issue:

25.01.2018

कुमार संतोष, आयुक्त (अपील्स), राजकोट द्वारा पारित / Passed by Shri Kumar Santosh, Commissioner (Appeals), Rajkot

मा आपर आयुक्ता संयुक्त आयुक्ता अगयुक्ता सहायक आयुक्त, केन्द्रीय उत्पद कुल्का सेवाकर, राजकोट / जासनगर / साधीराजा। द्वारा उपरामिकित जारी मूल आदेश से सजित: /

Ansing out of above mentioned CHO issued by Additional/Joint/Deputy/Assistant Commissioner, Central Excise / Service Tax, Rajkot / Jaminagar / Gandhidham :

घ अपीलकर्ता & प्रतिवादी का नाम एवं पता /Name&Address of the Appellants & Respondent -1.M/s Dharti Engineers Sardar Nagar Street No. 1 Chakkargadh Road, Amreli,-365601

इस आदेश(अपील) से ामधित कोई श्यक्ति जिस्सिविक्त तरीके में उपयुक्त पाणिकारी / पाणिकाण के समक्ष अपील दावर कर शकता है।/ Any person aggrieved by thin Order-in-Appeal may file an appeal to the appropriate authority in the following way:

(A) सीमा शुरूक ,केस्ट्रीय 3:पाद शुरूक एवं शंकाका अपीसीय स्थायाधिकरण के प्रति अपीस, केस्ट्रीय उत्पाद शुरूक ऑफिसियम ,1944 की धारा 358 के असमीत एवं वित्त अधिनियम, 1994 की धारा 86 ≅ असमीत सिम्मलिखित जगत की जा सकती है ।/

Appeal to Customs, Excise & Service Tax Appellate Tribunal under Section 358 of CEA, 1944 / Under Section 86 of the Finance Act, 1994 an appeal lies to:-

वर्गीकरण गृहवाक्य में सम्बन्धित सभी मामले सीमा शुन्क, केन्द्रीय उत्पादम शुन्क एवं सेशकर अधैनीय स्वाधानिकरण की विशेष पीठ, वेस्ट सर्वक स
 आर. के- पुरम, नई दिल्ली, को की जानी धाहिए ।

The special bench of Customa, Excise & Service Tox Appellate Tribunal of West Block No. 2, R.K. Puram, New Delhi in all matters relating to classification and valuation.

(वं) उपरोक्त परिचलेद 1(a) में बताए गए अपीजों के असावा शेष नभी अपीजे शीमा शुल्क, केंद्रीय उत्पाद शुल्क एवं सेककर अपीजीय स्थायाधिकरण (शिस्टेट) की पविचम लंडीय पीठिकर, , द्वितीय तल, बहुमाली भवन असावो अहमदाबाद- २८००१६ को की अजी चाहिए ए

To the West regional bench of Customs, Excise & Service Tax Appellate Tribunal (CESTAT) at, 2rd Floor, Bhaumali Bhawan, Asarwa Ahmedabad-380016 in case of appeals other than as mentioned in para- 1(a) above

The appeal to the Appellate Tribunal shall be filed in quadruplicate in form EA-3 / as prescribed under Rule 5 of Central Excise (Appeal) Rules, 2001 and shall be accompanied against one which at least should be accompanied by a fee of Rs. 1,000/- Rs.5000/-, Rs.10,000/- where amount of duty demand/interest/penalty/refund is upto 5 Lac. 5 Lac to 50 Lac and above 50 Lac respectively in the form of crossed bank draft in favour of Asst. Registrar of branch of any nominated public sector bank of the place where the bench of any nominated public sector bank of the place where the bench of the Tribunal is situated. Application made for grant of stay shall be accompanied by a fee of Rs. 500/-

(B) अपीलीय न्यायाधिकरण के समक्ष अपील, वित्त अधिनियम, 1994 की धारा 86(1) के अतर्गत संवाकर नियमवाली, 1994, के लियम 9(1) के लहत लिधिशत प्रथम 5.7.5 में चार प्रतियों में की जा सकेगी एवं उसके साथ जिस आदेश के विश्व अपील की साथ हो, उसकी पति साथ में समझ कर (उसमें में एक प्रति अपाय हों) धारित अपाय की मांग और नगा मांग कर प्रति के साथ, जहां संवाकर की गांग कामा की मांग और नगा जाया जुर्माना, रुपए 5 लाख या उससे कम, 5 लाख रुपए था 50 लाख रुपए तक अपात 50 लाख रुपए में मिप्पक है तो कमशा 1,000/- रुपये अपाय 10,000/- रुपये का निर्धारित जमा शुल्क की प्रति संवाम करें। निर्धारित शुल्क का मुगतान, संविधत अपीलीय न्यायाधिकरण की शरका के सहायक रजिस्टार के लाम में किया मांग किया मांग विश्व के बीक द्वार जारी रेखाकित वैक हाथर द्वारा किया जाना चाहिए। संविधत हाथर का मुगतान, वैक की उस शाखा में सीमा धाहिए जा सविधत अपीलीय न्यायाधिकरण की शाखा स्थित है। स्थानन आदेश (स्टे ऑक्ट्रें) के लिए आवेटन-पत्र के शाखा 500/- रुपए का निर्धारित शुल्क जमा काना होगा।

The appeal under sub-section (1) of Section 85 of the Finance Act, 1994, to the Appellate Tribunal Shall be filled in quadruplicate in Form S.T.5 as prescribed under Rule 9(1) of the Service Tax Rules, 1994, and Shall be accompanied by a copy of the order appealed against (one of which shall be certified copy) and should be accompanied by a fees of Rs. 1000/- where the amount of service tax & interest depanded & penalty levied of Rs. 5 Lakhs or less, Rs.5000/- where the amount of service tax & interest demanded & penalty levied in more than five takhs but not exceeding Rs. Fifty Lakhs, Rs.10,000/- where the amount of service tax & interest demanded & penalty levied is more than fifty Lakhs rupees, in the form of crossed bank draft in tevour of the Assistant Register of the bench of nominated Public Sector Bank of the place where the bench of Tribunal is situated. / Application made for grant of stay shall be accompanied by a fee of Rs.500/-.

, ato

- विरत अधिनियम, 1994 की धारा 86 की उप-धाराओं (2) एवं (2A) के अश्मीत दर्ज की नहीं अभीत, सेवाकर नियमवाली, 1994, के जिसम 9(2) एवं 9(2A) के तहत जिपीरित प्रपत S.T.-7 में की जा सकेगी एवं उसके साथ आयुक्त, केन्द्रीय उत्पाद शुरूक अथवा आयुक्त (अपीज), केन्द्रीय उत्पाद शुरूक द्वारा धारित आदेश की धारियों संजयन को (उनमें से एक धारि धाराणित होती चाहिए) और आयुक्त द्वारा सहाएक अयुक्त अथवा उपायुक्त, केन्द्रीय उत्पाद शुक्का सेवाकर, को अपीक्षीय स्वायाणिकाण को आदेदन दर्ज काने का निर्देश देने वाले आदेश की धार में संजयन करनी होगी । / The appeal under sub section (2) and (2A) of the section 86 the Finance Act 1994, shall be filed in For ST.7 as prescribed under Rule 9 (2) & 9(2A) of the Service Tax Rules, 1994 and shall be accompanied by a copy of order of Commissioner Central Excise or Commissioner, Central Excise (Appeals) (one of which shell be a certified copy) and copy of the order passed by the Commissioner authorizing the Assistant Commissioner or Deputy Commissioner of Central Exciser Service Tax to file the appeal before the Appellate Tribunal.
- सीमा शुल्क, केन्द्रीय उत्पाद शुल्क एवं सेवाक्य अपीलीय प्राधिकरण (सेस्टेट) के प्रति अपीली के मामले में केन्द्रीय उत्पाद शुल्क अधिविधम 1944 की धारा 35एक के अंतर्गत, जो की विल्लीय अधिनियम, 1994 की धारा 83 के अंतर्गत सेवाक्य को मी लामू की गई है, इस अदेश के प्रति अपीलीय (iii) पायिकरण में अपीन करते समय उत्पाद शुक्कांसेवा का मांग के 10 प्रतिशत (10%), जब मांग एवं जुमीना विवादित है. या जुमीना, जब केवल जुमीना विवारित है, वर मुगतान किया जाए, बशर्त कि इस धारा के अलगेत जमा कि जाने वाली अपेक्षित देश शीरी दस करोड़ स्पए से अधिक न हो।

केन्द्रीय उत्पाद शुक्क एवं सेवाकर के अतर्गत 'मांग किए गए शुक्क' में निम्न शामित है चारा 11 डी के अतर्गत रकम

संसदेट जमा की भी गई गलत राशि (4)

संस्केट जाना जिलासकी के जिला 6 के अंतर्गत देश रचन Oith

- बर्धार्त यह कि इस धारा के पानधान विल्तीय (सं. 2) अधिनियम 2014 के आरंभ से पूर्व किसी अधीरीय धार्मिकारी के समक्ष विधासकीन स्थमन अजी एवं अपीत की लागू सही होगे।/

For an appeal to be filed before the CESTAT, under Section 35F of the Central Excise Act, 1944 which is also made applicable to Service Tax under Section 83 of the Finance Act, 1994, an appeal against this order shall lie before the Tribunal on payment of 10% of the duty demanded where duty or duty and penalty are in dispute, or penalty, where penalty alone is in dispute, provided the amount of pre-deposit payable would be subject to a ceiling of Rs. 10 Crores.

Under Central Excise and Service Tax, "Duty Demanded" shall include :

amount determined under Section 11 D;

amount of enoneous Cenvat Credit taken;

amount payable under Rule 6 of the Cenvat Credit Rules

provided further that the provisions of this Section shall not apply to the stay application and appeals pending before any appellate authority prior to the commencement of the Finance (No.2) Act, 2014.

भारत सरकार की पुनरीक्षण आवेदन :

Revision application to Government of India: इस आदेश की पुजरीक्षण याचिका जिल्लातिकित सामलों से, केटीय उत्पाद शुरूक अधिनियस, 1994 की धारा 35EE के प्रथम परत्क के अंतर्गत अवर रुचिय, भारत संस्कार, पुजरीक्षण आवेदन ईकाई, जिल्ला संधानय, राजस्य विकेतम, धीवी मंजिल, जीवत दीप सवल, संसद साने, नहें दिल्ली-110001, को (C) विद्या जाना पाहिए।

A revision application lies to the Under Secretary, to the Government of India, Revision Application Unit, Ministry of Finance, Department of Revenue, 4th Floor, Jeevan Deep Building, Parliament Street, New Delhi-110001, under Section 35EE of the CEA 1944 in respect of the following case, governed by first proviso to sub-section (1) of Section-358 ibid:

- यदि मात के किसी नुकसान के सामले में, जहां नुकसान किसी माल को किसी कारखाने से शंदार गृह के पारमजन के दौरान या किसी अन्य कारखाने या कित किसी एक शंदार गृह से दूसरे शंदार गृह पारमान के दौरान, या किसी शंदार गृह से या शंदारण से मान के परंतकाण के दौरान, किसी कारखाने या किसी शंदार गृह से सान के मुकसान के सामले सें।! (0) In case of any loss of goods, where the loss occurs in transit from a factory to a warehouse or to another factory or from one
- warehouse to another during the course of processing of the goods in a warehouse or in storage whether in a factory or in a warehouse
- भारत के बाहर किसी राष्ट्र या क्षेत्र की निर्यात कर रहे मान के विनिर्माण में प्रयुक्त करते मान पर भरी नई केन्द्रीय उत्पाद चुन्क के फुट (रिबेट) के मामने में, जो भारत के बाहर किसी राष्ट्र या क्षेत्र की निर्याल की गयी है। / In case of reballe of duty of excise on goods exported to any country or territory outside india of on excisable material used in (6) the manufacture of the goods which are exported to any country or territory outside India.
- वदि उत्पाद कुन्क का मुगलान किए बिना भारत के बहर, रोपान या भुटान को मान निर्वात किया गया है। (iii) In case of goods exported outside india export to Nepal or Bhutan, without payment of duty
- लुनिश्चित उत्पाद के उत्पादम शुरूक के भूगताल के लिए जो इसूरी केवींट इस अधिनियन एवं इसके विभिन्न प्रावधारों के तहत सप्तम की गई है और ऐसे अंदेश जो आवृक्त (अधील) के द्वारा वित्त अधिनियम (स. 2), 1998 की धारा 109 के द्वारा नियत की गई तारीख अथवा समायाविधि पर या बाद में पारित किए गए हैं। (iv) Credit of any duty allowed to be utilized towards payment of excise duty on final products under the provisions of this Act or the Rules made there under such order is passed by the Commissioner (Appeals) on or after, the date appointed under Sec.
- 109 of the Finance (No.2) Act, 1998. (v)
- उपरोक्त आवेदन की दो प्रतियां ४४४ शहरण EA-8 में, जो की केन्द्रीय उत्पादन चुनक (अपीत) नियमावकी, 2001, के नियम 9 के अतर्गत विनिर्देश्ट है. इस आदेश के अंग्रेषण के 3 साह के अतर्गत की जानी पाहिए । उपरोक्त आवेदन के राज मूल आदेश में अपीन आदेश की दो प्रतिया संस्तरम की जानी पानिए। साथ ही केन्द्रीय उत्पाद बुनक अधिनियम, 1944 की घारा 35-EE के तहत निर्पादित बुनक की अदायगी के साथ्य के तीर पर TR-6 की प्रति संयम की जानी पाहिए। / The above application shall be made in duplicate in Form No. EA-8 as specified under Rule, 9 of Central Excise (Appeals). Rules, 2001 within 3 months from the date on which the order sought to be appealed against is communicated and shall be accompanied by two copies each of the OIO and Order-In-Appeal. It should also be accompanied by a copy of TR-6 Challen evidencing payment of prescribed fee as prescribed under Section 35-EE of CEA, 1944, under Major Head of Account.
- प्रविद्यां आवेदन के साथ निस्तानिक्कित निर्धारित शुरूक की अदावनी की जानी पालिए । जहाँ संवरन रकत एक लाख रूपये या उससे करू ही तो रूपये 200/- का मुगलान किया जाए और यदि संवरन रकत एक लाख रूपये से ज्यादा हो तो अपये 1000 / का मृजतान किया जाए । The revision application shall be accompanied by a fee of Rs. 200/- where the amount involved in Rupees One Lac or less and Rs. 1000/- where the amount involved is more than Rupees One Lac. (vi)
- कि इस आदेश में कई मून आदेशों का समावेश हैं तो प्रश्नोक मूल आदेश के लिए शूटक का मूमतान, उपर्युक्त इस में किया जाना वाहियों। इस तक्य के होने हुए भी की मिखा पदी कार्य में लिए प्रधानियारि अपीलीय स्वाधिकरण को एक अपील मा केटीय सरकार को एक आदेदन किया जाता है। / In case, if the order covers various numbers of order- in Original, fee for each O.I.O. should be paid in the aforesaid manner, not withstanding the fact that the one appeal to the Appellant Tribunal or the one application to the Central Govt. As the case may be, is filled to avoid scriptoria work if excising Rs. 1 linkh fee of Rs. 100/- for each. (D)
- वधाराशाधित ज्यावालय शुल्क अधिलियम, 1975, के अनुमुधी- के अनुशार मूल आदेश एवं स्थान आदेश की पति पर विधायित 6.50 रूपये का न्यायालय शुल्क दिक्तिर संग होता चाहिए। / One copy of application or O.L.O. as the case may be, and the order of the adjudicating authority shall bear a court fee stamp of Rs. 6.50 as prescribed under Schedule-I in terms of the Court Fee Act,1975, as amended. (E)
- নামা খুলাভ, উন্টোগ সংগত যুক্ত হয় ইয়াকং স্থানীয় ল্যায়ায়িকংম (কাম বিশি) নিম্মাননী, 1982 ম বাদীন হয় সদয় অভস্কিন মামানী কা মহিমানিত কাম বান নিমান কা সাং সাংগতিক কিলা জাতা হ। / Attention is also invited to the rules covering these and other related matters contained in the Customs, Excise and Service Appellate Tribunal (Procedure) Rules, 1982 (F)
- उच्च अधोलीय पाणिकारी को आनील दाखिल करते से संबंधित स्वांगक, जिल्लून और नवीलतक प्रत्याओं के लिए, अधीलायी विकासीय वेबसाइट (G) www.cbec.gov.in =0 5to 194-7 \$ 1.7
 For the elaborate, detailed and latest provisions relating to filing of appeal to the higher appellate authority, the appellant may refer to the Departmental website www.cbec.gov.in 100

:: ORDER-IN-APPEAL ::

M/s. Dharti Engineers, Sardar Nagar Street No. 1, Chakkargadh Road, Amreli-365601, Gujarat (hereinafter referred to as 'the appellant') has filed the present appeal against the Order-In-Original No. R/68/2016 dated 28.12.2016 (hereinafter referred to as 'the impugned order'), passed by the Assistant Commissioner, Service Tax Division, Bhavnagar (hereinafter referred to as "the lower adjudicating authority").

- 2. Brief facts of case are that the appellant filed an application for refund of Rs. 11,77,372/- for Service Tax paid by them for construction purpose on the basis of Section 102 of the Finance Act, 1994 (hereinafter referred to as "the Act"). The lower adjudicating authority issued query letter F. No. V/18-70/S.T./DIV/2016-17/Rf. dated 23.11.2016 asking appellant to submit reply to few discrepancies pointed out by the Department. Personal hearing was given to appellant, which was not attended to by them. The appellant filed reply dated 28.11.2016, however, Show Cause Notice dated 02.12.2016 was issued to appellant. Personal hearing was granted to appellant which was not attended by them but they submitted reply on 16.12.2016 and 19.12.2016.
- 3. The Show Cause Notice was decided by the lower adjudicating authority vide the impugned order wherein he sanctioned refund of Rs. 5,88,686/- and rejected refund of Rs. 5,88,686/- by holding it ineligible for refund being excess payment made by appellant under the provisions of Section 102 of the Act.
- Being aggrieved with the impugned order, the appellant preferred the present appeal on the following grounds:
 - 1. The appellant had provided services to various Government and local authorities in the nature of Works Contract Services falling at Sr. No. 12 of Mega Exemption Notification No. 25/2012-ST dated 20.06.2012. The sad exemption from payment of Service Tax was withdrawn on certain services vide Notification No. 06/2015-ST with effect from 01.04.2015. At the time of bidding for the said projects, the Service Tax exemption was available on the services provided to various Government and local authorities w.e.f. 01.04.2015 due to withdrawal of exemption, they had paid Service Tax on the said taxable services. The said exemptions were again restored vide Notification No. 09/2016-ST dated 01.03.2016 as mentioned at Section 102 of the Act. The works contract services

provided by them to the various Government and local authorities falls under the purview of Sr. No. 12(b) of Notification No. 25/2012-ST.

- 2. The application for claim of refund of Service Tax shall be made within a period of six months from the date on which the Finance Bill, 2016 receives assent of the President. The Finance Bill, 2016 got assent of the President on 14.05.2016 and they have filed refund claim on 11.11.2016 i.e. well within time limit.
- 3. The lower adjudicating authority failed to give consideration to the fact that they had provided services to the Government company and discharged their Service Tax liability during the period 01.04.2015 to 28.02.2016. They had also paid the Service Tax liability @50% on the part of M/s. Hindustan Steel Works Construction Limited which is over and above their Service Tax liability. Therefore, amount of Rs. 5,88,686/paid by them is to be considered as Service Tax paid mistakenly although the same is liability on the part of M/s. Hindustan Steel Works Construction Limited, and it is payment made without authority of law. Mere payment of amount would not make it Service Tax payment. They rely on the following case-laws:
- (a) KVR Construction reported as 2012 (26) STR 195 (Kar.)
- (b) Kalpataru Power Transmission Ltd reported as 2016 (45) STR 454 (Tri.-Ahmd.)

Therefore, the time limit prescribed in Section 11B of the Central Excise Act, 1944 does not applicable in their case.

5. Shri Chetan Detharia appeared and reiterated grounds of appeal; that Rs. 11.77 lakhs paid instead of Rs. 5.88 lakhs; that even payments needs to be refunded; that the case laws of Hon'ble High Court of Karnataka in the case of KVR Construction reported as 2012 (26) S.T.R. 195 (Kar.) and of Hon'ble CESTAT in Kalpataru Power Transmission Ltd reported as 2016 (45) S.T.R. 454 (Tri.-Ahmd.) cover the issue.

FINDINGS:

6. I have carefully gone through the facts of the case, the impugned order, the appeal memorandum and reply filed by appellant. The issue to be decided in the present appeal is as to whether Rs. 5,88,686/- paid by appellant on behalf of M/s. Hindustan Steel Works Construction Limited rejected by the

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lower adjudicating authority holding it as excess payment, is required to be refunded to the appellant or not.



- 7. I find that appellant has paid Service Tax of Rs. 5,88,686/- during the period April-September, 2015 and filed S.T.-3 return wherein Service Tax liability has been mentioned as Rs. 5,88,686/- and paid vide GAR-7 challan No. 02091 and 02090 both dated 11.08.2015 for Rs. 3,36,686/- and Rs. 1,12,000/- respectively. The appellant has also shown challan No. 01649 dated 03.10.2015 for Rs. 7,28,686/- as payment towards Service Tax liability for the quarter July-September, 2015. Thus, against their Service Tax liability of Rs. 5,88,686/-, they paid Service Tax of Rs. 11,77,372/-. The lower adjudicating authority, in the impugned order has sanctioned refund of Rs. 5,88,686/- and rejected refund of Rs. 5,88,686/- by holding it inadmissible as this amount should be claimed under Section 11B of the Central Excise Act, 1944, within one year. He also held that this excess payment of Rs. 5,88,686/- is ineligible to be considered for refund under the provisions of Section 102 of the Finance Act, 2016.
- 8. I find that amount of Rs. 5,88,686/- sanctioned as refund to the appellant is not in dispute. The only question is rejection of refund of remaining amount of Rs. 5,88,686/- which was paid in excess by the appellant and has been rejected as excess payment. It is a fact that the appellant was awarded contract for construction of boundary wall across the land allotted to Aligarh Muslim University Centre, Krishanganj, Chakla (Bihar) by M/s. Hindustan Steel Work Construction Limited for value of Rs. 7,23,66,994/-. In the grounds of appeal, the appellant has stated that they had also paid Service Tax liability @50% on behalf of M/s. Hindustan Steel Works Construction Limited, which is over and above their own Service Tax liability. Therefore, amount of Rs. 5,88,686/- paid by them is required to be considered as payment made by the appellant by mistake and Department can' retain this payment without authority of law.
- 9. The appellant has provided works contract services under reverse charge mechanism wherein, the service provider has to pay 50% of Service Tax and remaining is to be paid by the service receiver. In this case, the appellant has paid 100% of Service Tax as per the law, which service subsequently got exempted retrospectively vide Notification No. 09/2016-ST dated 01.03.2016 vide Section 102 of the Act. Therefore, the excess amount paid by mistake

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can't be considered as Service Tax after 01.03.216 and hence time limit of Section 11B will not be applicable in this case as held by Hon'ble Karnataka High Court in case of KVR Construction reported as 2012 (26) S.T.R. 195 (Kar.) and by Hon'ble CESTAT, Ahmedabad in case of Kalpataru Power Transmission Ltd reported as 2016 (45) S.T.R. 454 (Tri.-Ahmd.).

- 10. In view of above, I am of the view that there is no ground to deny the refund of excess payment of Service Tax claimed by the appellant and appeal filed by the appellant sustains. Accordingly, I set aside the impugned order and allow the appeal.
- ११. अपीलकर्ता दवारा दर्ज की गई अपील का निपटारा उपरोक्त तरीके से किया जाता है।
- The appeal filed by the appellant is disposed of in above terms.

(कुमार संतोष) आयुक्त (अपील्स)

By R.P.A.D.

To,

M/s. Dharti Engineers, Sardar Nagar Street No. 1, Chakkargadh Road, Amreli-365601

में.धरती एंजिनीयर्स, सरदार नगर स्ट्रीट संख्या १, चककरगढ़ रोड, अमरेली-३६५६०१.

Copy for information and necessary action to:

- The Chief Commissioner, GST & Central Excise, Ahmedabad Zone, Ahmedabad for his kind information.
- The Commissioner, GST & Central Excise, Bhavnagar.
- The Assistant Commissioner, GST & Central Excise, Division, III (Amreli), Bhavnagar.
- The Superintendent, GST & Central Excise, Range-Amreli.
- Guard File.

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