CHAPTER VIII

Tax Exemptions

Just like levying and collection of taxes, granting exemptions from paying them for certain purposes is an age old practice. It is but natural, since the basic principle of taxation was that all those engaged in gainful activities and all activities involving profitable transactions are to be taxed. The corollary is that those who are not engaged in gainful activities and thus cannot generate income more than what is sufficient for their livelihood are not to be taxed. Similarly activities which are not profitable, such as social and religious activities, unlike activities like agriculture, industry, trade and commerce etc. are to be outside the purview of taxation. The early works like Arthaśāstra and Dharmāśāstras deal with this subject in detail and give different lists of such exemptions. But the general opinion is that the learned brāhmaṇas engaged in educational and religious activities, house-hold women, physically disabled persons were to be exempted from the payment of taxes. Similarly, properties of the religious, charitable and educational institutions and goods meant for social and religious purposes, such as marriages, presentations, sacrifices
and worship, were also not to be taxed. More or less the same situation prevailed in the period of our study also.

The inscriptions of this period mention numerous instances of various types of grants which were exempted from the payment of taxes. The usual terms used in the inscriptions to denote exemptions are, Sarvva-bādhā-parihāra\(^1\) (free from all imposts), Sarvva-mānya,\(^2\) Sarvva-namasya,\(^3\) Sarvva-ābhyantara-siddhi,\(^4\) Sarvva-āya-suddhi,\(^5\) Sumka-pariraksita,\(^6\) Sumka-bāhira\(^7\) and the like. Almost every inscription contains one or the other such term. Normally we notice three types of tax exemptions. They have been discussed below:

1) Lands granted to religious institutions like temples, mathas, Jaina basadis and to the ascetics were exempted from the payment of taxes. Their produce was to be utilised for maintaining the institutions, conducting worship and other services, providing food for the students and the teachers in the mathas. And many times grant-money was used even for providing them with clothes and medical aid. An inscription of 1191 A.D. records a grant of land to god Paśchima-Somanātha at Karaḍikal and specifically states that the grant-land was exempted from Aruvana i.e. tax on land.\(^8\) But there is one example where the ascetic Rēvabbe goravi who was granted a piece of land, was to
pay a tax of 5 Gadyāṇas. In another case when a Jaina ascetic of Lokkigundī was granted a land, an Aruvana (tax) of twenty Gadyāṇas was fixed on it. An inscription of 1137 A.D. uses the expression Bhūmi-dēṇaka-nirmukti for denoting the exemption of land tax, Dēṇaka literally meaning 'what is to be given,' stands for a tax. Similarly an inscription of 1153 A.D. uses the expression Grha-dēṇaka-nirmukti to denote exemption of house-tax. The Marathi equivalent of this expression used in the same inscription is Grha-dēṇe na gehāve.

2) The agrahāras which were formed for habitating the learned scholars who were engaged in religious and educational activities were normally not taxed. But there were exceptions. There is an example of an agrahāra for Kukanur which was renovated as an agrahāra in the 13th Cent. A.D. It was stipulated that the inmates of the agrahāra should pay a fixed amount of tax. Another example is of Nīlagunda agrahāra where also the inmates were enjoined to pay 400 suvānṇas.

3) Commodities meant for supplying to the temple were also not to be taxed. An inscription of 1224 A.D. states that sale or purchase tax was not to be levied on goods which were brought into the town and meant for offerings to the god of Narasiṃha of Vijayapura. Perhaps the idea seems to be that the sale proceeds on such goods were to go to the temple. Hence they were not to be taxed. The same inscription also states that the vegetables grown
by the temple priests and sold were also to be exempted from the tax. It is also stated that spices and perfumery articles brought into the town for the same purpose were entitled for exemption from tolls. Another inscription of 1244 A.D. lays down that perfumery articles brought into the three provinces Taddavāḍi, Heḍa and Kaṇambaḍe (modern Bijapur region) were to be exempted from tolls. This exemption was granted by a tax officer when Bhāgubāyi who was the governor of these provinces. Presumably the sale proceeds from these articles were to be donated to the temple of god Siddhēśvara of Vijayapura i.e. modern Bijapur. The governor Bhāgubāyi is described as the Parama-viśvāsi of the Śeūṇa king Singhaña II.16

Inscriptions speak of numerous grants to individuals for their various services including laying their life in a battle, be it with an outside enemy or the cattle-lifters or even with miscreants perpetrating atrocities on women. But it is difficult to ascertain if all such grants were free from tax unless it is so specified.

Normally goods for sale brought to the weekly market were taxed in the form of tolls. But there is an instance of goods exempted from such tolls which were brought in a weekly fair at Bēvinūr mentioned in an inscription of 1190 A.D.17 This fair was established by a Śeūṇa officer as a part of a religious vow of his wife Siridēvi. He selected a spacious area and planted a good number of fruit
trees and dedicated that place for the fair which is called Dharroma-Santhe. He enjoined that nobody should collect any tolls on any commodities brought here, such as precious stones, horses, cloth, food grains etc.

REFERENCES AND NOTES

1. SII XX, No.122, 1173 A.D.
2. Ibid, No.542, 1049 A.D.
3. Ibid, No.155, 1206 A.D.
4. EI XIII, p.171, 1055 A.D.
5. EC VI (Old Edn.), Tk.20, 1105 A.D.
6. Ibid VII (Old Edn.), SK.133, 1131 A.D.
7. SII XVIII, No.216, 1226 A.D.
8. ARIE 1953-54, App.B-240
9. SII XI pt.I, No.50, 1138 A.D.
10. Ibid, No.52, 1007 A.D.
11. CII VI, No.21,
12. Ibid, No.26
13. JBBRAS XII, p.42
15. SII XVIII, No.216
16. Ibid, No.223
17. Ibid, XX, No.175
APPENDIX

I

Perjumka, Vaddaravula and Kirudere-Kirukula

Perjumka, Vaddaravula, Kirudere, Kirukula or Kirukula are the terms quite frequently used in the inscriptions in relation to tax. The context in which they are used shows that they were very important taxes but it is very difficult to find out what type of tax they exactly connoted.

1) Perjumka, Herjumka, Hejjumka (i.e. Piriya-sumka or Hiriya-sumka) : The term literally means big tax or major tax. From this point of view, B.L. Rice states that it was a customs duty 'on wholesale articles in bulk'.

That it related to entry tax is indicated by the statement 'Belvoladim banda bhandakke hejjumka maneide kolvaru in an inscription of 1117 A.D. But the expression, Perjumkada deseyim bitta ettu irppattaidu figuring in an inscription of 1118 A.D. indicates that this tax was levied on bulk goods. It perhaps means that this was levied on goods transported on 25 oxen. The purport of the expression 'Mallapayya nayakaru bitta hejjumkamumam 525 ettimge' occuring in an inscription of 1107 A.D. seems to be similar.
There are indications that Hejjumka was levied on goods as well as means of transport. The example of Herjjumka being levied on means of transport is clearly stated in the expression, Sāsira-pēru-ettimge perjjumka i.e. Perjjumka on the oxen carrying 1000 Heru possibly of betel-leaves bundle.  

An inscription of 1154 A.D. speaks of levying of Hejjumka on loads carried on donkeys (Katteya hērimge hejjumka).  

That Perjjumka was levied on agricultural land is suggested by the expression - tōntada Perjjumkamumam figuring in an inscription of 1141 A.D.  

Herjjumka was levied on bulk articles. This is indicated by the expression, mūru lakṣad-aḍakeya perjjumkamam.  

Herjjumka was levied on bundles of betel-leaves also, as known from an inscription of 1106 A.D. (Pannāyada eleya hērina vaddarāvula herjjumka).  

A study of the inscriptions shows that Perjjumka was collected at town level (Cf. Maleyanūra-sthalada hejjum-kepvuvaṇ i.e. Hejjumka of the place Malayanūr), and pooled at divisional level (Gudikalla 24 ra sthalada hejjumkadalli i.e. the Hejjumka of the places in the division of Gudikallu-24) and at provincial level (Hanugal-aṇūrara...
Vaddarāvula. Vaddarāvula is an enigmatic term defying correct interpretation, though undoubtedly it represents a tax. It is also to be noted that many times it is mentioned together with Herjjumka or Perjjumka and both were under the charge of one officer. In some cases different officers held charge of these taxes separately. The word consists of two terms Vadda and Rāvula. Vadda comes from Sanskrit term Vṛddha meaning senior, major, big and the like. The meaning of Rāvula is not clear, though the context shows that it meant a tax. It is suggested that Vaddarāvula stands for Sanskrit Vṛddharājakula and denotes a tax levied for the maintenance of senior members of the royal family. But this suggestion does not suit the context.

Vaddarāvula and Herjjumka were two separate types of taxes and perhaps both of them were levied on the same articles. For example, an inscription of 1141 A.D. speaks of both Perjjumka and Vaddarāvula on one and the same garden land (Śri Kaniya Mūlasthānadēvāra tōṇṭada perjjumka mumam vaddarāvulapumam i.e. Perjjumka and Vaddarāvula or
the garden of the temple of Kanîya Mūlastāna). So also an inscription of 1106 A.D. speaks of Vaddaravula and Herjumka on betel leaves (Pannāyad-eleya hērina vaddaravula herjumkam i.e. Vaddaravula and Herjumka on the Hēru of betel-leaves). Another inscription of 1142 A.D. refers to Vaddaravula and Herjumka on areca nut.

On the basis of these examples a tentative suggestion may be made that Herjumka represented the customs or tolls on transport of bulk goods and Vaddaravula represented tax on actual goods.

The inscription of 1118 A.D. referred to earlier in connection with Herjumka seems to provide an exception to this explanation when it refers to Irpattu ettina Vaddaravulada sumka which means Vaddaravula tax on twenty oxen. This seems to refer to tax on transport.

Closely associated with Herjumka and Vaddaravula is another tax known as Bilkode (Sāsira pēru ettimge perjumka-bilkode-Vaddaravula olagagi). It is however, difficult to explain the exact connotation of the term.

3) Kirudere, Kirukula : As against Herjumka and Vaddaravula which stood for major taxes, Kiru-dere, Kirukul-āya denote minor or smaller taxes on sundry articles. B.L. Rice explains these terms as taxes 'on miscellaneous and petty retail articles.' kiru means small and tere
stands for tax. Though āya means income, many times it is used to denote a tax. The term Kiru-sumka also represents the same type of tax. In one place the term Kirukula-tere is used in the same context. Though literally all these terms denote miscellaneous tax in general, some inscriptions seem to differentiate between them by mentioning them separately to denote different taxes. For example, an inscription of 1055 A.D. mentions Siddh-āya, Kiru-derē, Kirukula and Kandāya in one place indicating the difference between them. Similarly an inscription of 1088 A.D. also mentions Banṇige, Sāda, Kirudere and Kirukulāya seperately. An inscription of 1074 A.D. includes Mane-vaṇa, Piriyaravaṇa, Dhanabala, Kālagolchu, Mētiganduga and Angadiya timgalina bēle in Kirudere. Of these, Manevāna, Mētiganduga and Angadiya timgalina bēle stand for house tax, tax on threshing floor and monthly tax on shops, respectively. The meaning of the other terms is not known. An inscription of 1228 A.D. includes Alla (Ginger), Bella (Jaggery), Arisina (Turmeric) and others in Kirukula (Alla-bella-arisina modalāgī kirukulavellavām). Thus, it is possible that these terms represented minor taxes as compared to bigger ones like Perijumka and Vaddaravula though distinctions between them is not clear.

Interestingly, in Kannada gradually Kirukula came to connote pin-pricks or harassment, perhaps because of the true nature of the tax itself.
REFERENCES AND NOTES

1. Rice B.L., *Mysore and Coorg from Inscriptions* p.175; M. Chidananda Murthy prefers to interpret the term as 'Pēru-Sumka' and understands it as tax on ḫeru. This is incorrect etymologically as well as from the context. (Chidananda Murthy M, *A Cultural Study of the Kannada Inscriptions* 450-1150 A.D., p.400; 'Customs duties' are defined as 'duties charged by law upon the commodities imported into or exported from a country'. (*Dictionary of Political Economy* Vol I p.474, as quoted in Gopal M.H. *Mauryan Public Finance* p.75.

2. KI V, No.16


5. EI XXVIII, p.35, 1082 A.D.

6. SII XVIII, No.158

8. Ibid IX pt.I, No.118, 1057 A.D.; See also mūru lakka ḍakēyā sumkā vaḍḍalāvulaḍa hejjumkāmām biṭṭaru
9. Ibid, No.170
10. Ibid, No.273, 1180 A.D.
11. Ibid, No.279, 1186 A.D.
12. KI V, No.19, 1121 A.D.
13. SII IX pt.I, No.223, 1127 A.D.
16. SII XVIII, No.145
17. Ibid IX pt.I, No.170
18. Ibid, No.238
19. An inscription of about 12th Cent. A.D. (SII IX pt.I, No.391) mentions a term Hejjumkā-ṛavula. It is not known if it is a mistake to Hejjumkā and Vaḍḍaravula.
20. EII XXVIII, p.35, 1082 A.D.
22. KI II, No.12, 1114 A.D.
23. SII IX pt.I, No.224, 1197-98 A.D.
24. *KI* I, No.17

25. *SII* XVIII, No.95, ; See also *Ibid*, No.96, 1062 A.D.

26. *Ibid* XX, No.47

27. *KI* VI, No.73

II

**Bīṭṭi - Free Service**

Offering free service or labour to the government agencies appears to have been a part of the tax structure from the very early days in our country. This concept must have originated in the basic principle that all those who receive protection from the king should offer him something in lieu of protection. We have seen earlier that it is through this that the concept of taxation originated. Those who could afford to pay in cash or kind, would do so, but the question was about those who were unable to pay the king in cash or kind. It was prescribed that such people were to offer free service to the king. In course of time, it became compulsory and even forced. This is represented by the term *Vīṭṭi* in our literature and inscriptions.

Kautilya states that the officer called *Samāhartā* should keep an account of different types of villages,
grains, cattle, forest produce and also Viṣṭi.¹ Bhaṭṭasvāmi, the commentator on Arthaśāstra explains this term as 'such forced labour was demanded in lieu of the payment of taxes due from the villagers'.² Manusmṛti and other Dharmaśāstra writers also prescribe the offering of such services for a specified number of days.³ It is to be noted that it was considered a sort of a tax and it has been listed in the inscriptions along with other taxes. A study of the inscriptions shows that this practice was in vogue in all parts of the country from very early days such as the Mauryas (4th Cent. A.C.) till a very late period.

Coming to the period of our study, we come across a term Biṭṭi which is said to be derived from Sanskrit Viṣṭi and it is also listed along with other taxes to be paid to the government. For example, an inscription of 1271 A.D. reads as follows: I gaddege sese siddhāya khānā abhyāgate kārukaḷa paṭṭabandha putrōtsaḥa āneya sese kudureya sese kāṭakasēse biṭṭi sollage ...... mukhyavāgi ella tereyanū.⁴ Another inscription of 872 A.D. also mentions Biṭṭi along with another tax Nīruṇi-sumka.⁵ However, an inscription of 1213 A.D. clarifies the position when it states Śūdrarūm kārurakum biṭṭi-besam māḍuvaru i.e. the Śūdras and the artisans offer free service.⁶ An inscription of 992 A.D. states that certain categories of persons were exempted from this type of service (Pamchamatha-sthāṇakkam biṭṭi yilla).⁷
The nature of such service or labour is not clear. It can only be surmised that the government officials could call such persons and assign them any type of work including attending on the visiting officers, repairs of roads and buildings and even construction of tanks and the like. They were used in the armies also. Mahābhārata says that along with horses, elephants, chariots and soldiers, Viṣṭi or free labourers also followed the army. They were obviously utilised in unskilled work like carrying the arms and other material, helping and lifting the wounded soldiers on the battle field, and so on. On the basis of a statement occurring in the Kannada work Pampa-Bhārata, it is presumed that such people were used for carrying flags in the marching of the army.

REFERENCES AND NOTES

1. Arthaśāstra, II.35.1
2. As quoted in Kher N.N., Agrarian and Fiscal Economy, p.300
3. Altekar A.S., State and Government in Ancient India, p.281
4. EC VII (Rev.Edn.), Ng.74
5. SII IX pt.I, No.15
Additional Levies and Collections

Our early writers have made special provisions for earning extra income to the government under extraordinary circumstances. Practical administrator as he was, Kautilya envisages difficult days for the government caused by such events as wars, famines, epidemics etc., to meet which more money was needed. He advocates that the State treasury must always be full and if need be, more funds are to be raised from the public by increasing the rate of tax, accelerating production, raising loans and for that matter, by any means fair or foul. He prescribes even deceitful methods for acquiring wealth. Though this would go against the basic principles of taxation of which he himself was a protagonist, he preferred to override
them if it was in the interest of the kingdom. For him, the kingdom's interest was the foremost and in safeguarding this interest any means would be a good means. He however, warns that such methods were to be used only very very sparingly, that is, only once, perhaps in the lifetime of a king.¹ Modern scholars call these levies as Emergency Tax.

It is not necessary to go into the details of this subject since the sources of the period of our study do not mention such extraordinary situations and remedies thereto. Works like Mānasollāsa also do not appear to refer to such a situation. As pointed out elsewhere, the overall picture of the finances of the State in the Deccan kingdoms in the period of our study was one of affluence and surplus income. The very fact that large chunks of government property like land, and considerable portion of the government revenue were being liberally donated to the individuals and institutions, shows that these kingdoms did not witness any situation of economic stringency let alone envisage it.

REFERENCES AND NOTES

1. For a discussion on the topic, see Gopal M.H., Mauryan Public Finance, pp.134 ff.
IV

Was Taxation a Burden on the People?

On the basis of the study of the tax system in ancient India, some scholars have raised the question as to whether taxation was a burden on the people. The large number of taxes on almost all activities of human life listed by Kautilya and the prescriptions of punishments for defaults relating to them, do give such an impression. The so-called emergency taxes recommended by him are also frightening. Such a position does create an impression that taxation was really oppressive in the early days. To add to it, several cases of harassment of tax-officers have been reported in the inscriptions and literary works of different periods. Nilakantha Sastri therefore, come to the conclusion that taxes were too oppressive. But Altekar holds a different view.

Coming to the period of our study, the situation was not much different so far as the number of taxes is concerned. The detailed discussion on different types of taxes in the previous chapters shows that taxation was too wide even to cover small agriculturists and petty merchants moving from place to place carrying their goods on shoulders to sell them in the weekly fairs (Santhe). Petty professionals like barbers and carpenters were also not spared. The temple dancers also had to part with a share
in their income by way of tax. Social functions like marriages were also not excluded. A comparison might show that the number of taxes was much more in the earlier days than in the present day. Yet our sources do not show any situation of economic constraints and consequent coercive methods of collecting more than the due.

We have seen that large number of exemptions were granted for religious, charitable and educational causes. The tax officers diverted considerable sums of money and quantities of other articles accruing from tax collections for such purposes. On the part of the people, they voluntarily contributed large sums of money for such purposes. They even took upon themselves to pay regularly almost like a tax, for the maintenance of religious and educational institutions. We have a comely example of the people of Sāloṭāgi (945 A.D.) who took upon themselves the burden of regularly contributing sums of money on different occasions for maintaining a Šāla or the school in that place. The school was so famous that students from different regions (Nānā-Janapada) gathered here for study. It was established by an officer called Gaḍāmkuśa Nārāyaṇa who was a minister of Kṛṣṇa III. The inscription giving these details states that the people of this place volunteered to pay regularly to this Šāla-vidyārthi-sangha
i.e. the community of students of this school a sum of 5 Puṣpas (coins) on the occasion of marriage and Upanayana, and half of that sum on the occasion of Chudākarma. On the occasion of festive feasts, the teachers and the students of this Śālā were to be invited. There are other examples also of this type.

Thus, these go to show that the economic conditions of the kingdoms of the Deccan during the period of our study were quite sound and the question of collecting more and more money by undue means did not arise. Had the situation been otherwise, the officers could not have ventured to divert the state funds for religious and charitable purposes and the people would not have been in a position to liberally contribute for such causes.

Not that there were no cases of harassment of the people on account of tax or the misuse of the power by the officials. But such instances were few and far between and they must have been due to the vagaries of some local officers. Interestingly, there are evidences to show that in most cases the grievances were redressed by the higher authorities. An inscription of 991 A.D. belonging to Chālukya Taila II for example, records a case of increase in the rate of tax. The facts of the case are that during the earlier regime of the Ṛṣṭrakūṭa Kannara (Krṣṇa III), the tolls on the betel-leaves were paid at the rate of two
Panas and an Adda per Heru. But in the next Chalukya regime, an officer Adityavarma increased the rate of tolls (Sumkada anyāva perchidade), the aggrieved guild of the betel-leaf merchants and other merchants of the locality including the 500 mahājanas of Balguḷi approached the king and apprised him of the situation. Thereupon the king restored the earlier rates of the days of Kṛṣṇa III (Kannaṅadēvara maryyādeyal-āda sumkada maryyādeyam tappade naḍayim-endo). An earlier inscription of 942 A.D. narrates an unfortunate incidence of a hero named Pampayya of Rōṇa losing his life in a scuffle when the chief of Belvola demanded tax on paddy which was perhaps enjoyed by the local inhabitants. The scuffle arose when Pampayya refused to pay even a grain (Nān-ond-akṣateyan-appaṁde-īyenendu) and it resulted in his death.

REFERENCES AND NOTES

1. Sastri K.A.N., A History of South India, p.316
2. Altekar A.S., State and Government in Ancient India pp.283-84
3. EI IV, pp.60 ff., 945 A.D.
4. SII IX pt.I, No.76
5: Ibid. XI pt.I, No.36; There is another very interesting case of protesting by the people against the atrocities of an officer, though not concerning the tax, recorded in an inscription of 1104 A.D. It states that an officer names Oppayya attacked the agrahāra Hoḷalu and plundered the place and killed the brāhmaṇas. The Mahājanas, of the agrahāra reported this to the king. The king ordered the dismissal of the errant chief, and the Pradhānas and others gave an undertaking from the latter that neither himself nor his descendants would claim the office of Manneya of that agrahāra, any more. He took an oath to this effect and accordingly erected the inscription which narrates to us this case (SII IX pt.Ⅰ, No.169, 1104 A.D.)

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