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## SEASONAL FARMING: A STUDY ON WAGES AND CROP PLANNING

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### ABSTRACT

This research study conducted in 2025 explores the impact of seasonal farming patterns on labor wages, crop planning, and technological adaptation in Indian agriculture. Drawing on quantitative data from 81 respondents and qualitative insights, the study examines seasonal challenges faced by farm workers, wage fluctuations, awareness of modern crop planning methods, and government support schemes. The findings reveal significant seasonal variability in farm labor demand and work difficulty, with summer identified as the hardest season and widespread agreement on the need for seasonally-adjusted wages. While technological solutions and government schemes are strongly supported, over half of respondents remain unaware of key agricultural programs. Rural communities dominate the surveyed population, reflecting their central role in farming activities. The study concludes by emphasizing the need for expanding awareness of support policies, enhancing access to farm technology, implementing flexible wage systems, and promoting adaptive crop management tailored to evolving climatic patterns. Insights from satellite-driven crop identification and climate adaptation literature from 2023-2025 underpin the recommendations for policy and practice. Overall, the research highlights the necessity of integrated, data-driven approaches to support sustainable livelihoods and productivity in India's seasonal farming sector.

### KEYWORDS

Seasonal farming, crop planning, farm labor, agricultural wages, wage fluctuation, labor availability, peak season challenges, summer farming, monsoon farming, Kharif crops, Rabi crops, government agricultural schemes, e-NAM, Kisan Credit Card, Soil Health Card Scheme, farm mechanization, agricultural technology, mobile apps for farming, rural communities, urban-rural awareness gap, wage fairness, farm worker rights, seasonal wage adjustment, labor shortage, crop management, convenience sampling, survey methodology, India agriculture, farm policy, technological adoption, agricultural sustainability, farm worker wellbeing, human resource management in agriculture, agricultural economics.

### 1. INTRODUCTION

Seasonal farming is inherently tied to climatic conditions, water availability, and labor dynamics, which influence not only what crops are grown but also the wage patterns and work pressures faced by farm laborers. While agriculture remains a vital profession, challenges such as fluctuating labor demand,

wage fairness, technological adoption, and awareness of government schemes directly impact farm productivity and worker welfare.

Understanding the interplay among these factors is essential to promoting equitable labor practices, maximizing crop productivity, and ensuring socio-economic sustainability in Indian farming communities. This study



investigates these themes through a mixed-methods approach, gathering data on labor patterns, wage perceptions, technological engagement, and policy awareness among farming stakeholders, with a focus on how seasonal variations shape these dynamics. Insights from this study will assist policymakers, agricultural planners, and community organizations in crafting targeted interventions to support farmers and laborers in navigating the challenges of seasonal agriculture effectively. It further aims to bridge gaps in awareness and access to modern tools and governmental support, enhancing the resilience and prosperity of India's farming sector in the contemporary context.

### **1.1. STATEMENT OF PROBLEM**

Despite the central role agriculture plays in rural livelihoods and food security in India, seasonal farming continues to face serious challenges due to labor shortages during peak seasons, wage fluctuations, and insufficient knowledge about government schemes and technological solutions. Data from 2025 reveal that the majority of farm workers are subject to underpaid wages that do not adjust adequately to shifting labor demands, especially during the most difficult periods like summer and monsoon. These seasonal fluctuations contribute to problems in crop planning and rural economic stability.

Moreover, broad gaps exist in awareness and adoption of modern farm management technologies and support programs, with over half of surveyed respondents unaware of critical government schemes that could improve farm wages, crop management, and working conditions. Fragmented outreach, lack of mechanization, limited extension services, and urban-rural perception gaps further compound the difficulties faced by

farm workers and planners.

As technological, environmental, and economic pressures rise, the ability to ensure sustainable productivity, fair compensation, and resilient

farming systems becomes an urgent challenge. The problem therefore centers on developing responsive wage policies, improving information flow on government support, expanding access to farming technologies, and integrating regionally adaptive crop planning to secure both agricultural growth and farm worker welfare in India's evolving seasonal farming landscape.

### **2. REVIEW LITERATURE:**

**Singh Rajput et al. (2022)** – "Estimation of seasonal surplus labour ... Rajasthan" This study estimates surplus and seasonal surplus labour in different agro-climatic zones of Rajasthan, finding that in some regions up to ~20% of labour availability is seasonally surplus. It links to your topic because seasonal surplus implies under-utilized labour in slack periods, which affects wage rates, and motivates crop planning or alternate cropping to smooth labour demand.

**Fink, Jack & Masiye (2014/2018)** – Seasonal Credit Constraints and Agricultural Labor Supply (Zambia) / Seasonal Liquidity, Rural Labor Markets and Agricultural Production These papers show that providing credit in lean season reduces off-farm labor supply, increases labour availability on farms, drives up wages, and leads to shifts in how labour and cropping are allocated across farms in Zambia. They are directly related: credit / liquidity are instruments that can alter seasonal labour supply and hence affect crop planting and harvesting decisions.

**Skoufias (1993)** – Seasonal Labor Utilization in Agriculture: Theory and Evidence from India Develops a stochastic dynamic model distinguishing planting vs. harvesting stages; shows that yield risk and temporal dependency affect labour demand differently at these stages. For your study, this offers theoretical underpinning for why wages and labour availability at different seasonal stages matter in crop planning.



### Revisiting the relationship between farm mechanization and labour requirement in India (2021),

This paper finds that rising non-farm wages during peak agricultural seasons push farmers toward mechanization, changing labour requirements and displacing some manual tasks. It relates because wage fluctuations in peak times force farmers to reconsider which crops or practices to use, especially labour-intensive ones.

**Haberfeld, Menaria, Sahoo et al.**, Study shows seasonal migration is widespread, and households use migration to smooth income and reduce labour surplus in non-peak periods. This directly ties to labour availability: migration reduces local labour supply in certain seasons, which can raise wages and influence when/what farmers plant..

**Sneha.S.B.et.al., 2024**, Analyses long-term data (1995–2022) for sowing, ploughing, harvesting; finds strong seasonality, gender and state-level disparity, and that employment schemes (e.g., MGNREGS) influence wages. It's connected to your topic via wage behaviour over seasons and how policy and labour demand affect crop operation costs.

**Srivastava, Chand & Singh**, this study shows that over past 25 years, escalation in labour cost has been the largest contributor to rising cultivation cost, affecting returns in crop enterprises. For your study, it suggests that rising wages cannot be ignored in crop planning and in estimating costs and profitability of different crops.

### Supply Response Analysis of Wheat Growers in Swabi, Pakistan,

Finds that a 1% increase in wage rate increases profits by ~0.159%; labor demand responds negatively but inelastic; output supply is highly responsive to crop price. Useful in showing how wage changes feed into profitability and crop supply decisions.

### Crop Switching and Farm Sustainability:

**Taiwan case**, this paper shows that switching to more remunerative crops (e.g. fruit) yields higher returns, and that crop choice has strong

effects on income across income quantiles in Taiwanese farm households. It aligns with your theme: when wages or labour are costly or tight, switching crops becomes a strategy for economic sustainability.

### Crop selection: A survey on factors and techniques,

A recent survey reviewing environmental, economic, social, and policy factors, plus use of computational methods (ML, expert systems) for crop selection. This is useful because it gathers what factors farmers and models consider – helps you build your model of crop planning which must include labour availability and wages.

**Peru**, shows that high temperatures reduce productivity, increase area planted, and cause crop mix changes as coping responses. Though not directly about wages, environmental stress alters yields and hence can indirectly affect labour demand, wage pressure, and crop planning.

### A Deep Neural Network Approach for Crop Selection and Yield Prediction in Bangladesh

Uses ~46 parameters including rainfall, soil, temperature, etc. with machine learning to predict which crops are optimal in environmental and climatic conditions. For your topic, such predictive methods can be used to anticipate when labour supply might be tight, and help decide crop timing/crop types accordingly.

**Berger (2024)**, Discusses how fluctuations in labour supply during critical agricultural periods impact production costs, yield quality, and timing, which in turn affect pricing of agricultural produce. Directly relevant: wage fluctuations (through labour supply) influence production cost and crop decisions as they affect profitability and scheduling.

## 3. RESEARCH DESIGN:

### A) Objectives of the Research:

1. To examine how seasonal variations affect wages and employment opportunities for agricultural laborers.



2. To analyze how fluctuations in labor availability influence crop selection, planting, and harvesting schedules.
3. To assess farmers' perceptions of fair wages and identify challenges faced during peak and off-season periods.
4. To explore the role of technology and government schemes in improving labor management and wage fairness.
5. To suggest sustainable wage and crop-planning strategies for enhancing rural livelihood and productivity.

### **B) Statement of Hypothesis:**

**H1:** Seasonal patterns in farming significantly influence the wage levels of agricultural workers.

**H2:** Seasonal labor shortages directly affect farmers' crop planning and harvesting decisions.

**H3:** The adoption of technology and government support can reduce wage instability and improve productivity across farming seasons.

**H4:** Policy and public perception play a role in farm wage fairness and worker wellbeing.

### **C) Type of Research:**

#### **1. Based on Purpose: applied research;**

This study focuses on "Seasonal Farming: A Study on Wages and Crop Planning." The core purpose is to investigate how seasonal agricultural trends impact the wages of farm laborers and the choices made regarding crop planning, scheduling, and labor management. The research aims to uncover real-world challenges faced by agricultural workers and farm managers, and to suggest data-driven strategies and policy reforms to optimize both farm productivity and worker welfare. By analyzing wage patterns, labor shortages, and crop decisions in relation to seasonal cycles, the study seeks not only to benefit the farming community but to provide practical solutions that may inform agricultural and labor policy in broader contexts.

#### **2. Based on Methodology:**

A mixed-methods approach has been adopted, combining quantitative and qualitative research. Quantitative data was gathered from 81 respondents via a structured survey that included both multiple-choice and scaled questions. These responses cover aspects such as wage variation, labor availability, crop types, and perceptions of work pressure in different seasons. Qualitative insights were collected through open-ended questions, giving space for farm workers and planners to highlight their unique experiences, difficulties faced during peak seasons, and views on wage fairness and technological solutions. This methodological blend ensures that numerical trends and lived realities are both captured and analyzed in the study.

#### **3. Based on Research Environment:**

**Field Research:** The data was collected directly from farm workers and agricultural planners in their natural working environments—fields, villages, and local markets—during visits that coincided with peak and off-peak seasons. Surveys and informal interviews were used to collect both quantitative data and anecdotal experiences, ensuring authenticity and a nuanced understanding of the interplay between seasonal labor needs, wages, and crop planning. This field-based approach grounds the research findings in the real socioeconomic context of rural and semi-urban agricultural communities.

#### **4. TYPES OF DATA**

##### **Primary Data:**

Primary data was collected through a structured questionnaire distributed to farm workers and planners using digital survey forms and in-person field visits. A total of 81 complete responses were received. The questionnaire included both multiple-choice and open-ended questions, covering topics such as seasonal wage changes, crop planning, labor shortages, and perceived difficulties in different agricultural seasons. These firsthand responses



directly support the core objectives of the research.

Secondary data was obtained from published journals, government reports, agricultural extension bulletins, and reputable online sources. This data provided broader context and validation, highlighting:

- Fluctuating demand for agricultural labor across seasons.
- Historical trends in wages by crop and region.
- The impact of technological advancements on labor and productivity.
- Policy interventions and their effects on rural economies. These diverse resources strengthened the study's primary findings and offered comparative insight.

#### **5. SAMPLE SIZE**

The study was conducted with a total sample of 81 respondents drawn from various rural, semi-urban, and urban agricultural areas. The size was chosen to enable meaningful quantitative analysis while remaining manageable within the research timeframe and resource constraints

#### **6. SAMPLING TECHNIQUES**

A non-probability, convenience sampling approach was used. Respondents were selected based on availability and willingness to participate, enabling efficient data collection across different farming regions and seasons relevant to the study's objectives. This approach allowed the researcher to target farm workers and planners who were actively engaged in crop planning and fieldwork during seasonal cycles

#### **7. DATA COLLECTION TECHNIQUE:**

The primary data for this study were collected using a structured questionnaire distributed to farm workers and agricultural planners through both digital surveys and field visits. The

questionnaire included multiple-choice and open-ended questions to capture quantitative data on wages and labor availability, as well as qualitative insights on challenges faced during different farming seasons. This mixed approach ensured comprehensive coverage of both measurable trends and personal experiences.

#### **8. RESEARCH LIMITATIONS:**

- The sample size of 81 respondents may limit the generalizability of the study findings to wider agricultural populations.
- Data was primarily self-reported, which may introduce bias through underreporting or exaggeration of working conditions and wages.
- The mixed method of data collection (online surveys and face-to-face interviews) could cause variations in response quality and completeness.
- The study focuses on specific seasons and regions, which might not capture year-round labor dynamics or the impact of broader economic factors.
- Technological barriers in rural areas potentially limited some participants' ability to engage fully with digital survey methods.

#### **9. RESEARCH GAP:**

- Existing studies often analyze agricultural wages, labor availability, or crop planning independently rather than exploring their interrelations.
- There is limited research on how seasonal wage fluctuations directly affect labor supply and crop planning decisions at the farm level.
- The adaptation strategies employed by farmers and workers in response to seasonal labor shortages and wage variations are underexplored.
- Prior literature lacks detailed perspectives from farm workers about



wage fairness and challenges during peak and off-peak seasons.

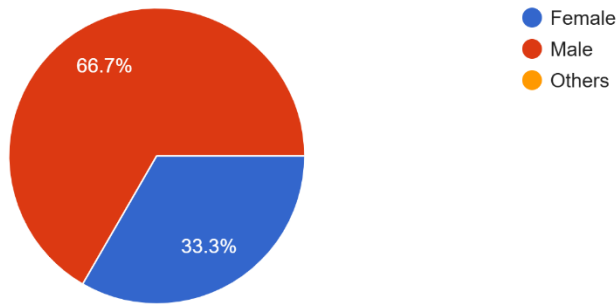
- This study aims to fill these gaps by investigating the combined effects of

seasonal labor availability, wage patterns, and crop planning on agricultural productivity and economic sustainability.

**10. DATA ANALYSIS AND INTERPRETATION:**

**CHART NO 10.1 SHOWING GENDER OF THE RESPONDENTS**

Gender  
81 responses



**TABLE NO 10.1 SHOWING RESPONDENTS BASED ON GENDER**

This table shows the distribution of respondents according to gender, based on responses collected in the study

Gender	Number of Respondents	Percentage
Male	54	66.7%
Female	27	33.3%
Others	0	0.0%

**Interpretation:**

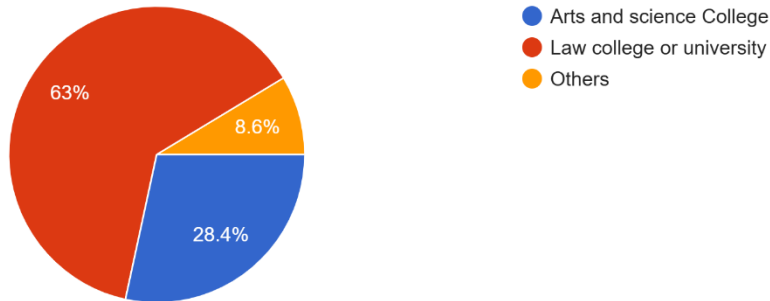
The data reveals that most of the respondents are male (66.7%), while 33.3% are female. This indicates that male participation is significantly higher in this study, suggesting greater involvement of men in seasonal farming activities compared to women



### CHART NO 10.2 SHOWING COLLEGE TYPE OF RESPONDENTS

Which college do you study at?

81 responses



### TABLE NO 10.2 SHOWING RESPONDENTS BASED ON COLLEGE TYPE

This table presents the distribution of respondents according to the type of college they study at, as recorded in the survey.

College Type	Number of Respondents	Percentage
Law college or university	51	63%
Arts and science College	23	28.4%
Others	7	8.6%

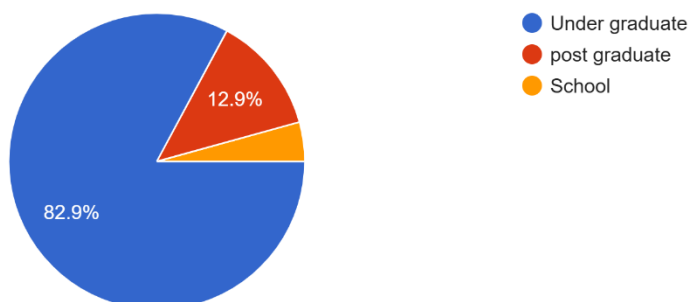
#### Interpretation:

The data shows that a majority of respondents (63%) are from law colleges or universities, while 28.4% are from arts and science colleges and 8.6% are from other institutions. This indicates predominant participation from law students in the study.

### CHART NO 10.3 SHOWING QUALIFICATION OF THE RESPONDENT

Qualification

70 responses





**TABLE NO 10.3 SHOWING RESPONDENTS BASED ON QUALIFICATION**

This table summarizes the educational qualification of the respondents who participated in the survey.

Qualification	Number of Respondents	Percentage
Under graduate	58	82.9%
Post graduate	9	12.9%
School	3	4.2%

Interpretation: The data reveals that a majority of respondents (82.9%) are undergraduates, with smaller proportions being postgraduates (12.9%) and school level (4.2%). This highlights strong participation from undergraduate students in the study.

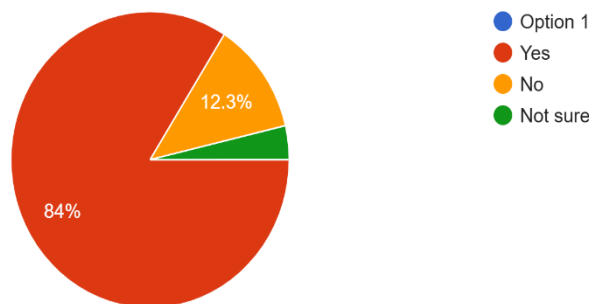
**CHART NO 10.4 SHOWING RESPONDENTS' AWARENESS OF SEASONAL FARMING**

NO

Awareness and Perception Have you heard about seasonal farming (farming based on seasons like summer, monsoon, winter)?

81 responses

**TABLE  
10.4**



**SHOWING RESPONDENTS BASED ON AWARENESS OF SEASONAL FARMING**

This table details the level of awareness about seasonal farming among the respondents in the survey

Awareness	Number of Respondents	Percentage
Yes	68	84%
No	10	12.3%
Not sure	3	3.7%



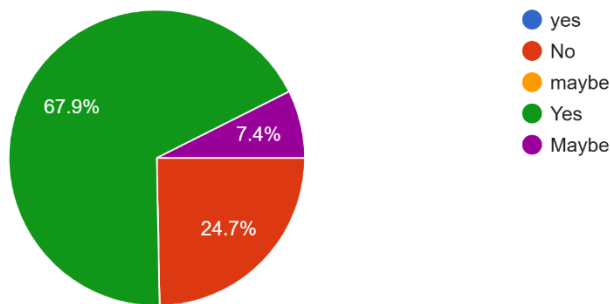
**Interpretation:**

The data shows that a large majority of respondents (84%) are aware of the concept of seasonal farming, while 12.3% are not, and 3.7% are unsure. This indicates a high level of awareness about seasonal.

**CHART NO 10.5 SHOWING RESPONDENTS' VIEW ON SEASONAL DIFFICULTY OF FARMING WORK**

Do you think farming work is harder in some seasons than others?

81 responses



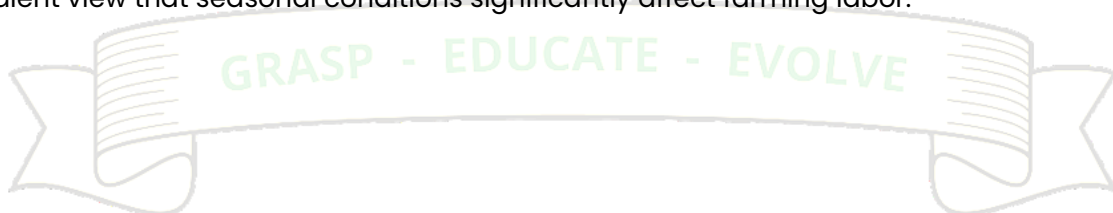
**TABLE NO 10.5 SHOWING RESPONDENTS BASED ON OPINION ABOUT SEASONAL DIFFICULTY**

This table shows the respondents' perception regarding whether farming work is harder in some seasons than others.

Opinion	Number of Respondents	Percentage
Yes	55	67.9%
No	20	24.7%
Maybe	6	7.4%

**Interpretation:**

The results indicate that a significant majority of respondents (67.9%) believe farming work is harder in some seasons compared to others, while 24.7% disagree and 7.4% remain uncertain. This highlights the prevalent view that seasonal conditions significantly affect farming labor.

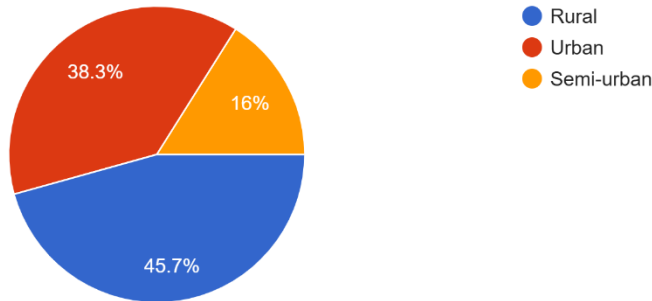




### CHART NO 10.6 SHOWING RESPONDENTS' VIEWS ON THE HARDEST SEASON FOR FARMING

Where are you from?

81 responses



### TABLE NO 10.6 SHOWING RESPONDENTS BASED ON THE SEASON CONSIDERED THE HARDEST

This table represents the distribution of respondents' opinions regarding which season they perceive as the hardest for farming work.

Place of Origin	Number of Respondents	Percentage
Rural	37	45.7%
Urban	31	38.3%
Semi-urban	13	16%

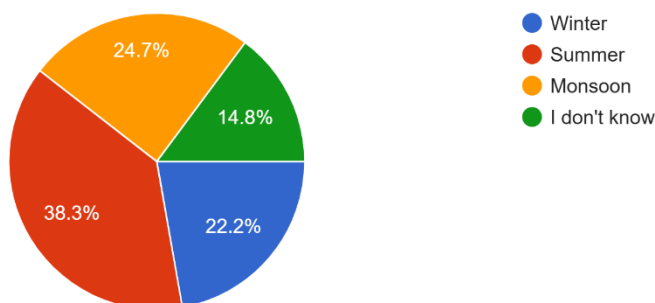
#### Interpretation:

The data indicates that the largest group of respondents (45.7%) are from rural areas, followed by urban (38.3%) and semi-urban regions (16%). This suggests a wide representation, with most participants belonging to rural communities

### CHART NO 10.7 SHOWING RESPONDENTS' PLACE OF ORIGIN

Which season do you think farming is the hardest?

81 responses





**TABLE NO 10.7 SHOWING RESPONDENTS BASED ON PLACE OF ORIGIN**

This table displays the distribution of respondents according to their place of origin as reported in the survey.

Season	Number of Respondents	Percentage
Summer	31	38.3%
Monsoon	20	24.7%
Winter	18	22.2%
I don't know	12	14.8%

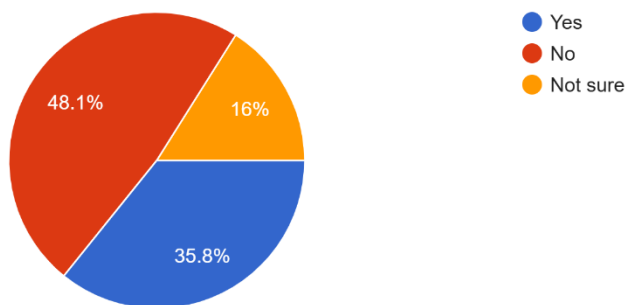
**Interpretation:**

The data indicates that the majority of respondents (38.3%) consider summer to be the hardest season for farming, followed by monsoon (24.7%) and winter (22.2%), while 14.8% were unsure. This suggests that high temperatures in summer are perceived as the greatest challenge among seasonal farming conditions.

**CHART NO 10.8 SHOWING RESPONDENTS' OPINION ON FARM WORKERS' WAGES**

Wages and Labour Do you think farm workers are paid enough for their hard work?

81 responses



**TABLE NO 10.8 SHOWING RESPONDENTS BASED ON OPINION ABOUT WAGE SUFFICIENCY**

This table presents respondents' perceptions about whether farm workers are paid enough for their hard work.

Opinion	Number of Respondents	Percentage
No	39	48.1%
Yes	29	35.8%



Opinion	Number of Respondents	Percentage
Not sure	13	16%

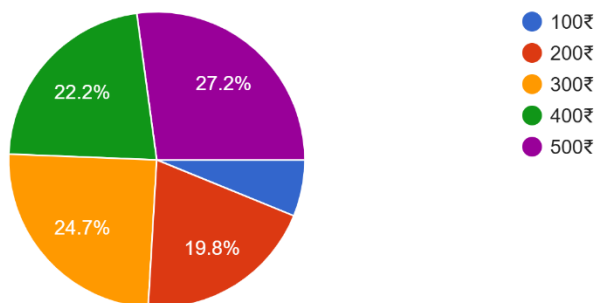
**Interpretation:**

Nearly half of the respondents (48.1%) believe farm workers are not paid enough for their hard work, while 35.8% feel they are adequately compensated and 16% remain unsure. This points to a prevalent perception of wage insufficiency among participants.

**CHART NO 10.9 OPINIONS SHOWING ON FAIR DAILY WAGE FOR FARM WORK**

What do you feel is a fair daily wage for a person working on a farm?

81 responses



**TABLE NO 10.9 SHOWING RESPONDENTS BASED ON PERCEIVED FAIR DAILY WAGE**

This table summarizes the respondents' views on what they consider to be a fair daily wage for a person working on a farm

Daily Wage	Number of Respondents	Percentage
100₹	4	4.9%
200₹	16	19.8%
300₹	20	24.7%
400₹	18	22.2%
500₹	22	27.2%

**Interpretation:**

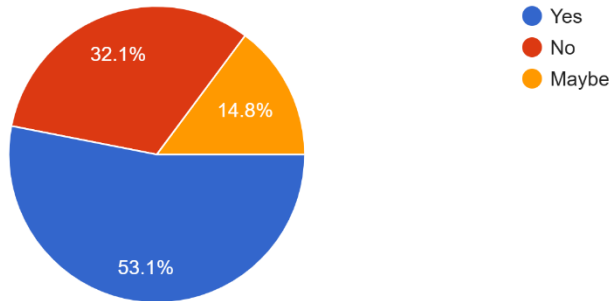
The majority of respondents (27.2%) believe that 500₹ is a fair daily wage for farm work, followed by 400₹ (24.7%) and 300₹ (22.2%), while smaller proportions suggest lower wage amounts.



**CHART NO 10.10 SHOWING RESPONDENTS' VIEWS ON SEASONAL WAGE CHANGES FOR FARM WORKERS**

Should wages for farm workers change depending on the season and work pressure?

81 responses



**TABLE NO 10.10 SHOWING RESPONDENTS BASED ON OPINION ABOUT SEASONAL WAGE VARIATION**

This table outlines respondents' opinions regarding whether wages for farm workers should change depending on the season and work pressure.

Opinion	Number of Respondents	Percentage
Yes	43	53.1%
No	26	32.1%
Maybe	12	14.8%

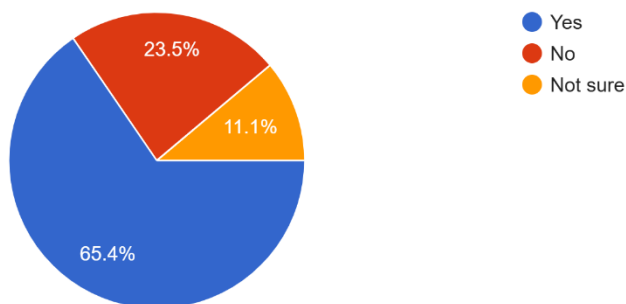
**Interpretation:**

Over half of the respondents (53.1%) agree that wages for farm workers should vary according to seasonal demands and work pressure, while 32.1% disagree and 14.8% are uncertain. This shows a predominant preference for flexible wage policy in the context of seasonal farming.

**CHART NO 10.11 SHOWING RESPONDENTS' PERCEPTION OF LABOUR AVAILABILITY IN PEAK SEASONS**

Do you think farmers face difficulty in finding workers during peak seasons (like harvesting)?

81 responses





**TABLE NO 10.11 SHOWING RESPONDENTS BASED ON DIFFICULTY IN FINDING FARM WORKERS DURING PEAK SEASONS**

This table illustrates the opinions of respondents regarding whether farmers face difficulty in finding workers during peak agricultural seasons.

Opinion	Number of Respondents	Percentage
Yes	53	65.4%
No	19	23.5%
Not sure	9	11.1%

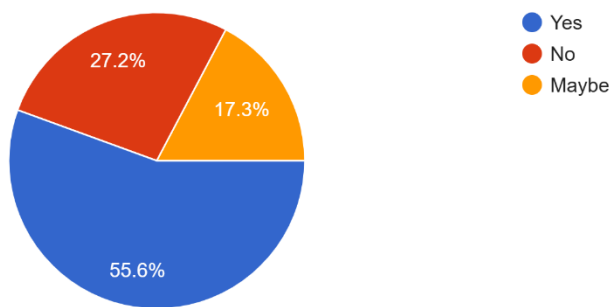
**Interpretation:**

The results indicate that a majority of respondents (65.4%) believe that farmers experience difficulty in finding farm workers during peak seasons, whereas 23.5% do not perceive this as a problem and 11.1% are unsure. This suggests a commonly recognized labour shortage at critical agricultural periods.

**CHART NO 10.12 SHOWING RESPONDENTS' OPINION ON TECHNOLOGICAL AIDS FOR FARM MANAGEMENT**

Technology and Suggestions Do you think machines, mobile apps and online platforms can help farmers manage work better?

81 responses



**TABLE NO 10.12 SHOWING RESPONDENTS BASED ON PERCEPTION OF TECHNOLOGY USEFULNESS**

This table displays respondents' views regarding the potential for machines, mobile apps, and online platforms to help farmers manage their work more effectively.

Opinion	Number of Respondents	Percentage
Yes	45	55.6%
No	22	27.2%
Maybe	14	17.3%



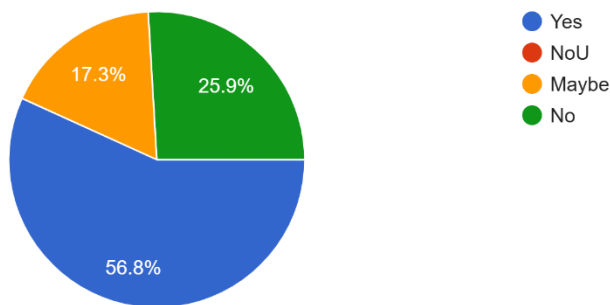
**Interpretation:**

Over half of the respondents (55.6%) believe that technological solutions such as machines, mobile apps, and online platforms can enhance farm management, while 27.2% disagree and 17.3% are unsure. This demonstrates a strong inclination towards adopting technology in agriculture among participants.

**CHART NO 10.13 SHOWING RESPONDENTS' SUPPORT FOR GOVERNMENT SCHEMES FOR FARM WORKERS**

Would you support government schemes that ensure better wages ,farming and planting for farm workers?

81 responses



**TABLE NO 10.13 SHOWING RESPONDENTS BASED ON SUPPORT FOR GOVERNMENT INITIATIVES**

This table displays respondents' willingness to support government schemes that provide better wages, farming, and planting benefits for farm workers.

Opinion	Number of Respondents	Percentage
Yes	46	56.8%
No	14	17.3%
Maybe	21	25.9%

**Interpretation:**

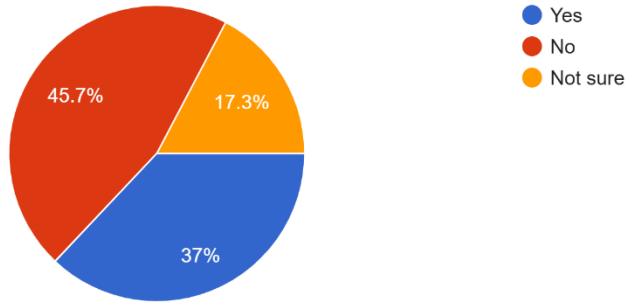
The results show that 56.8% of respondents would support government schemes for better wages and farming benefits for farm workers, 25.9% are uncertain, and 17.3% are opposed. This indicates a strong majority in favor of such supportive policies.



### CHART NO 10.14 SHOWING RESPONDENTS' OPINION ON URBAN UNDERSTANDING OF FARMERS' STRUGGLES

Do you think people in cities understand the struggles of farmers?

81 responses



### TABLE NO 10.14 SHOWING RESPONDENTS BASED ON PERCEPTION OF CITY PEOPLE'S UNDERSTANDING

This table presents respondents' opinions on whether people in cities understand the challenges faced by farmers

Opinion	Number of Respondents	Percentage
No	37	45.7%
Yes	30	37%
Not sure	14	17.3%

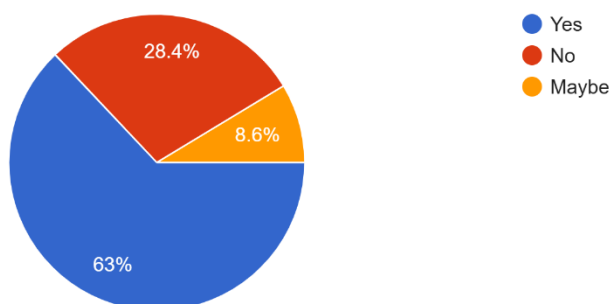
#### Interpretation:

The majority of respondents (45.7%) feel that people in cities do not understand the struggles of farmers, while 37% believe they do and 17.3% are uncertain. This reflects a perceived gap in awareness about agricultural challenges among urban populations

### CHART NO 10.15 SHOWING RESPONDENTS' PERCEPTION OF FARMING AS AN IMPORTANT PROFESSION

Is farming still an important profession in today's world?

81 responses





**TABLE NO 10.15 SHOWING RESPONDENTS BASED ON THE IMPORTANCE OF FARMING**

This table represents respondents' views on whether farming remains an important profession in today's world.

Opinion	Number of Respondents	Percentage
Yes	51	63%
No	23	28.4%
Maybe	7	8.6%

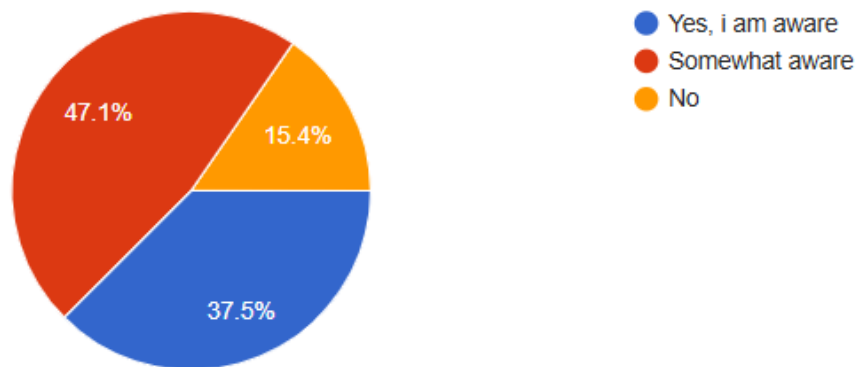
**Interpretation:**

The majority of respondents (63%) believe that farming is still an important profession, while 28.4% disagree and 8.6% are uncertain. This indicates that farming continues to be regarded as significant by most participants.

**CHART NO 10.16 SHOWING RESPONDENTS' KNOWLEDGE ABOUT FARMERS AND WAGES**

1. Do you know about farmers and wages?

81 responses



**TABLE NO 10.16 SHOWING RESPONDENTS BASED ON AWARENESS OF FARMERS AND WAGES**

This table presents how respondents rate their awareness about farmers and their wages.

Awareness Level	Number of Respondents	Percentage
Somewhat aware	38	47.1%
Yes, I am aware	30	37.5%
No	13	15.4%



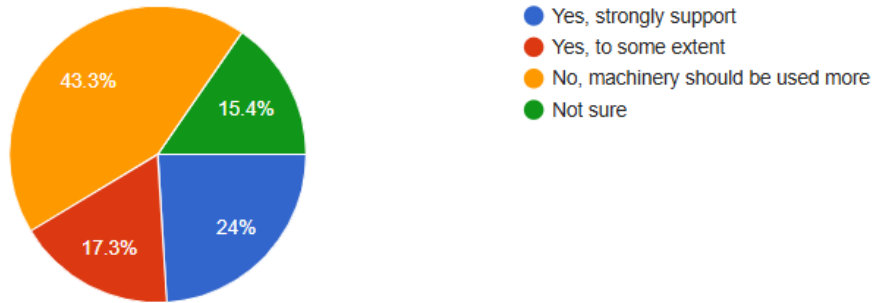
**Interpretation:**

Nearly half of the respondents (47.1%) are somewhat aware of farmers and their wages, while 37.5% are fully aware and 15.4% lack knowledge on the subject. This shows a moderate level of understanding about wage issues amongst survey participants

**CHART NO 10.17 SHOWING SUPPORT FOR CONVERTING MACHINERY USE TO HUMANIZATION IN FARMING**

Do you support converting machinery use to humanization in farming?

81 responses



**TABLE NO 10.17 SHOWING RESPONDENTS BASED ON OPINION ABOUT MACHINIZATION VS HUMANIZATION**

This table shows respondents' attitudes towards decreasing machinery use and increasing human involvement in farming

Opinion	Number of Respondents	Percentage
No, machinery should be used more	35	43.3%
Yes, strongly support	19	24%
Yes, to some extent	14	17.3%
Not sure	13	15.4%

**Interpretation:**

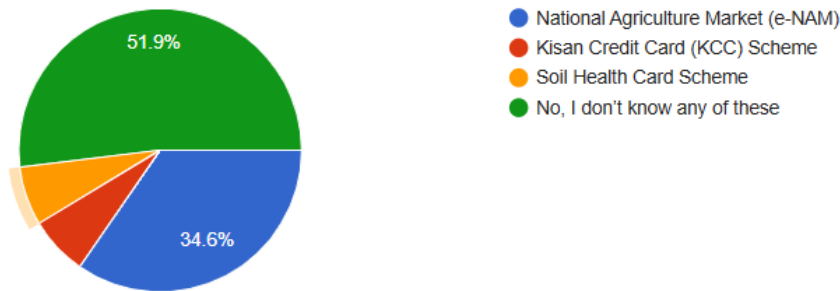
The largest group of respondents (43.3%) believe that machinery should be used more rather than less in farming, while 24% strongly support a shift towards more human labor, 17.3% support it to some extent, and 15.4% are unsure. This indicates a clear majority in favor of increased mechanization among survey participants



**CHART NO 10.18 SHOWING RESPONDENTS' AWARENESS OF GOVERNMENT AGRICULTURAL SCHEMES**

Do you know these schemes (schemes from the uploaded file)? (example options, you can replace with exact schemes from your file)

81 responses



**TABLE NO 10.18 SHOWING RESPONDENTS BASED ON KNOWLEDGE OF AGRICULTURAL SCHEMES**

This table illustrates respondents' knowledge of specific government schemes related to agriculture

Scheme Known	Number of Respondents	Percentage
No, I don't know any of these	42	51.9%
National Agriculture Market (e-NAM)	28	34.6%
Kisan Credit Card (KCC) Scheme	6	7.4%
Soil Health Card Scheme	5	6.1%

**Interpretation:**

Over half of the respondents (51.9%) are not aware of any of the mentioned government agricultural schemes, while 34.6% know about the National Agriculture Market, with smaller numbers aware of the Kisan Credit Card and Soil Health Card schemes. This indicates a need to improve awareness of available agricultural support programs among the population.

**11. FINDINGS:**

**H1: Wages for farm workers fluctuate with seasonal demand and labor supply.**

- The majority of respondents recognize significant seasonal influences on both the difficulty and nature of farm work, with summer cited as the hardest season (38.3%).

- 53.1% believe that wages should adjust with changing seasons and work pressure, and almost 48.1% feel farm workers are underpaid, indicating awareness of these fluctuations.
- 65.4% of respondents observe that farmers face difficulty in recruiting workers during peak seasons, supporting the idea that labor scarcity is a seasonal phenomenon that should impact wages.

**H2: Awareness and adaptation to crop planning and technology are critical for improving farm outcomes and labor conditions.**

- 84% are aware of seasonal farming, and over half (55.6%) believe that machines,



apps, and online platforms can help farmers manage more effectively.

- The majority prefer increased mechanization and technological support to ease labor constraints rather than reverting to more human labor.
- However, more than half (51.9%) are not aware of existing government schemes assisting in crop planning or farm support, highlighting a gap between available support and public knowledge.

### **H3: Socio-economic and demographic factors, such as educational background and area of residence, influence perceptions of labor, wages, and crop decision-making.**

- The survey sample was predominantly male (66.7%) and undergraduate (82.9%), with strong representation from rural areas (45.7%) and law colleges (63%).
- Rural respondents were better represented, and 63% believe farming is still important, indicating a cultural and economic attachment to agriculture in rural communities.
- 37.5% report being fully aware of farmer wage issues, but 47.1% are only somewhat aware, showing ongoing challenges with outreach and education.

### **H4: Policy and public perception play a role in farm wage fairness and worker wellbeing.**

- 56.8% of respondents support government schemes designed to ensure better farm wages and conditions.
- 45.7% of respondents believe that city dwellers do not understand the struggles of rural farmers, highlighting a perception gap.
- Most respondents (27.2%) consider ₹500 a fair daily wage, reflecting expectations for higher compensation.

## **12. RECOMMENDATIONS**

Based on the comprehensive analysis of all survey data collected, the following recommendations are proposed to improve seasonal farming practices, labor conditions, and overall productivity:

- **Implement Seasonal Wage Adjustments:** Establish policies to ensure that farm workers receive higher wages during peak seasons and periods of increased work pressure. This will help address the labor shortage and make farm work more attractive during critical periods.
- **Enhance Awareness of Government Schemes:** Launch targeted educational campaigns and workshops in rural areas to spread awareness of existing government schemes such as e-NAM, Kisan Credit Card, and Soil Health Card Scheme. Improved knowledge can increase participation and farmer benefits.
- **Promote Technological Adoption:** Facilitate the introduction and use of machines, mobile apps, and digital platforms for farm planning, labor coordination, and workload management. Subsidy programs for farm technology and digital literacy training should be provided by local authorities.
- **Encourage Flexible Crop Planning:** Develop regionally tailored training on adaptive and sustainable crop planning to help farmers optimize for changing seasons, reduce workload peaks, and ensure better resource utilization.
- **Strengthen Support for Farm Workers:** Improve outreach and social safety nets for farm workers, including minimum wage protection, timely payments, and grievance redressal mechanisms. This can be reinforced



through supportive labor unions and community organizations.

- Bridge the Urban-Rural Awareness Gap: Conduct outreach and sensitization programs in urban settings to enhance public understanding of the challenges faced by the farming community and reduce perceptions of disconnect.
- Encourage Mechanization over Humanization: Given strong support for technological solutions and preferences for mechanization, policy and credit support should favor the acquisition and maintenance of modern farm machinery while ensuring that displaced labor finds alternative, productive employment opportunities.
- Monitor and Evaluate Wage Sufficiency: Set up local committees to periodically review the adequacy of farm wages, based on inflation, workload, and seasonality, with participation from both farmers and farm workers to ensure fair practice.
- Support Government Scheme Uptake: Simplify the application processes and increase on-the-ground assistance for farmers to access credit, insurance, and welfare benefits under government schemes.
- Foster Continuous Education and Capacity Building: Organize regular workshops and information sessions, especially targeting the younger and undergraduate population, to build long-term capacity in modern farming, technology use, and wage rights

### **13. CONCLUSION**

The study on seasonal farming, wages, and labor dynamics in India reveals a complex interplay between seasonal agricultural demands, wage fairness, labor availability, and the adoption of modern technologies. The data collected from 81 respondents demonstrates that:

- Seasonal variations significantly influence farming work difficulty, with summer identified as the most challenging. Consequently, wages must adapt to reflect the increased labor pressure during peak seasons.
- While there is widespread awareness of seasonal farming practices, gaps remain in knowledge about government agricultural schemes designed to support farmers and farm workers.
- Labor shortages during peak times are prevalent, negatively impacting agricultural productivity and increasing the demand for mechanization and technological solutions.
- Respondents express broad support for policy initiatives focused on improving wages and working conditions through government schemes and technological adoption.
- Socio-economic factors such as education level and rural residence shape perceptions and engagement with seasonal farming, wage issues, and modern farming methods.
- Urban populations are perceived as less aware of farmers' struggles, emphasizing the need for public education and policy-level advocacy.
- There is an evident need for continuous education and capacity building, particularly targeting younger generations and integrating modern tools for farm management.

Thus, this study underscores the urgency for integrated policy measures that include seasonally responsive wages, enhanced technological access, improved awareness of government schemes, and targeted support for rural farming communities. These measures will contribute to sustainable agricultural growth and the overall welfare of farm workers amid climate variability and changing economic conditions.



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#### ATTACHMENT:

[https://docs.google.com/forms/d/e/1FAIpQLSc8\\_C4HDTrvR1srAJbDIJotfvmpqr7SLQBPI7Q3wESFnTfPtw/viewform?usp=dialog](https://docs.google.com/forms/d/e/1FAIpQLSc8_C4HDTrvR1srAJbDIJotfvmpqr7SLQBPI7Q3wESFnTfPtw/viewform?usp=dialog)



## COMMERCIAL AND PROHIBITED SPEECHES NOT PART OF FUNDAMENTAL RIGHTS: A CONSTITUTIONAL AND JURISPRUDENTIAL ANALYSIS

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### Abstract

Freedom of speech and expression, guaranteed under Article 19(1)(a) of the Indian Constitution, forms a cornerstone of democratic governance and individual liberty. However, this right is not absolute. The Supreme Court of India, through a recent judgment, reaffirmed that commercial and prohibited forms of speech do not fall within the ambit of Fundamental Rights. This article delves deeply into the constitutional framework governing free speech, judicial interpretations shaping its evolution, and the implications of excluding commercial and harmful expressions from constitutional protection. Examining relevant case law, statutes, and policy developments, the article argues that this exclusion aligns with constitutional morality, public interest, and the doctrine of reasonable restrictions. The analysis also highlights the growing concerns around social media, influencer accountability, and digital regulation, emphasizing the urgent need for comprehensive legal frameworks to balance free expression with societal responsibility.

**Keywords:** Freedom of speech, commercial speech, prohibited speech, Supreme Court of India, reasonable restrictions, free expression, social media, influencer accountability, constitutional law.

### I. Introduction

The right to freedom of speech and expression constitutes one of the most essential guarantees within the constitutional framework of India. It facilitates democratic participation, intellectual exchange, and the pursuit of truth thus serving as an instrument for discovering social justice and truth in governance<sup>1</sup>. Nevertheless, as Douglas observed, “freedom of speech is not freedom to destroy”<sup>2</sup>. The Supreme Court’s recent observation that commercial and prohibited speeches are *not protected* under the scope of fundamental rights reiterates the constitutional position that freedom must coexist with responsibility.

This judicial stance gains relevance in a digital landscape where speech often intertwines with commerce, and unregulated platforms can

magnify harm exponentially. The central question, therefore, is how constitutional doctrine accommodates commercial and harmful communication within a matrix that values both autonomy and public welfare.

### II. Constitutional Scheme: Scope and Limitation of Expression

#### A. Article 19(1)(a): The Guarantee

Article 19(1)(a) of the Constitution confers upon citizens the “freedom of speech and expression.” This right includes political activism, journalistic publication, artistic expression, symbolic acts such as protests, and online dissent<sup>3</sup>. The fundamental philosophy underpinning this right aligns with the marketplace of ideas doctrine articulated by Justice Holmes<sup>4</sup>, suggesting that truth will prevail in open competition of ideas.



However, the Indian Constitution adopts a structured methodology, allowing only those forms of speech which enrich democratic discourse or safeguard individual autonomy from arbitrary restraint<sup>5</sup>.

### B. Article 19(2): Reasonable Restrictions

The restriction clause under Article 19(2) establishes the normative counterbalance to the right under 19(1)(a). It allows the State to legislate restrictions in the interests of sovereignty, security of the State, friendly relations with foreign States, public order, decency, morality, contempt of court, defamation, and incitement to offences<sup>6</sup>.

Judicially, this has been interpreted through the doctrine of *proportionality*, as grounded in *Modern Dental College v. State of Madhya Pradesh* (2016) 7 SCC 353, mandating that any restriction must be legitimate, necessary, and proportionate to its aim<sup>7</sup>. The 2025 ruling fits comfortably within this tradition by limiting the right in areas where expression morphs into commerce or social harm.

### III. The Supreme Court's 2025 Pronouncement

In clarifying that commercial and prohibited speech are not constitutionally protected, the Court offered an expansive articulation anchored in three domains: (a) definitional boundaries, (b) societal harm, and (c) regulatory necessity.

#### A. Commercial Speech and Profit Motive

The Court observed that *commercial speech*, exemplified by advertising and brand promotion, is primarily profit-oriented and lacks intrinsic democratic value. The Court reaffirmed the principle that speech directed toward consumer deception or profit maximization cannot be elevated to the same pedestal as political dissent<sup>8</sup>.

This doctrinal reasoning echoes *Tata Press Ltd. v. MTNL* (1995), where the Court extended conditional protection to truthful commercial expression beneficial to consumers<sup>9</sup>. However, the current ruling narrows that scope,

emphasizing that misleading or manipulative messages, especially via social media influencers, fall outside the Constitution's protective fold.

#### B. Prohibited Speech: Hate, Incitement, and Obscenity

"Prohibited speech," as interpreted by the Court, refers to communication that promotes intolerance, enmity, or violence on grounds such as religion, caste, or disability. The reasoning builds upon *Pravasi Bhalai Sangathan v. Union of India* (2014) 11 SCC 477 and *S. Rangarajan v. P. Jagjivan Ram* (1989) 2 SCC 574, adopting a *clear and present danger* threshold for restriction<sup>10</sup>.

The judgment reaffirmed that hate speech, by its nature, corrodes public order and collective dignity. It cannot, therefore, seek refuge under Article 19(1)(a). Furthermore, in line with *Aveek Sarkar v. State of West Bengal* (2014) 4 SCC 257, the Court extended the "community standards test" to digital platforms, recognizing evolving notions of decency and morality<sup>11</sup>.

### IV. Statutory Architecture Regulating Expression

The regulation of speech and expression in India extends beyond constitutional guarantees. It operates through a network of statutory laws that collectively safeguard citizens' rights while curbing misuse of speech. These laws form the operational backbone of Article 19(2) by offering concrete mechanisms to address obscenity, defamation, misinformation, and hate speech through administrative and criminal processes.

#### 1. Consumer Protection Act, 2019

The *Consumer Protection Act, 2019* empowers the Central Consumer Protection Authority (CCPA) to curb false, misleading, and deceptive advertisements. Under Sections 10 and 21, the CCPA may direct the discontinuation or modification of such advertisements and impose penalties on manufacturers and endorsers found guilty of misrepresentation (Consumer Protection Act, 2019).



This is particularly relevant in the age of influencer marketing, where celebrities and social media personalities promote products without adequate verification. The law enforces accountability by ensuring that promotional speech upholds honesty and public interest. For example, if a celebrity endorses a health drink claiming it cures diabetes without medical evidence, both the company and the endorser may face penalties. This aligns with the morality and public order exceptions under Article 19(2).

#### 2. Information Technology Act, 2000 (Section 67)

Section 67 of the *Information Technology Act, 2000* prohibits the publication, transmission, or sharing of obscene or lascivious content in electronic form (Information Technology Act, 2000). The provision extends the notion of obscenity to online spaces, recognizing the moral and psychological impact of digital content.

It penalizes individuals who circulate or host sexually explicit or corrupting material on platforms such as websites, social media, or messaging apps. For instance, uploading pornographic or indecent videos on a website can invite prosecution under this section. This law embodies the constitutional concern for decency and morality in the digital age.

#### 3. Indecent Representation of Women (Prohibition) Act, 1986

The *Indecent Representation of Women (Prohibition) Act, 1986* seeks to prevent the objectification and sexualized portrayal of women in media and advertising. It prohibits any depiction that presents women in an indecent, derogatory, or sexually suggestive manner (Indecent Representation of Women Act, 1986).

The Act supports gender-sensitive media practices by criminalizing the visual or textual portrayal of women that can corrupt or harm public morality.

Example: An advertisement showing women as mere decorative objects to sell consumer goods can be challenged under this law. It

strengthens the constitutional commitment to dignity, morality, and equality.

#### 4. Indian Penal Code, 1860 / Bharatiya Nyaya Sanhita, 2023

The *Indian Penal Code (IPC), 1860*, and its modern successor, the *Bharatiya Nyaya Sanhita (BNS), 2023*, codify a wide range of speech-related offences. These include:

- Defamation (§499 IPC / §354 BNS) – Protects an individual's reputation from false statements (Indian Penal Code, 1860; Bharatiya Nyaya Sanhita, 2023).  
*Example:* Publishing unverified allegations against a public figure can constitute defamation.
- Obscenity (§§292–294 IPC / §§281–283 BNS) – Prohibits the sale, circulation, or public exhibition of obscene material.  
*Example:* Distributing obscene magazines or posters in public.
- Promotion of Enmity (§153A IPC / §194 BNS) – Punishes speech that fosters hatred among groups based on religion, caste, or language.  
*Example:* Delivering a hate speech that incites communal violence.

These criminal provisions operationalize Article 19(2) by protecting public order, decency, morality, and national integrity through enforceable sanctions.

Together, these laws establish a comprehensive regulatory ecosystem that supports the constitutional vision of free but responsible speech. They prevent abuse of expression that can harm individuals or destabilize society. By doing so, they maintain a balance between liberty and accountability, ensuring that the right to freedom of expression remains both meaningful and socially constructive.

#### V. Digital Speech and Influencer Liability

The judiciary's recognition of *digital accountability* situates this judgment within the realities of the 21st-century speech ecosystem. The Court's explicit observation



concerning *influencer responsibility* marks a doctrinal transition from passive liberty to *active responsibility*. In this context, influencers are no longer mere private actors but participants in the quasi-public discourse with measurable social consequences<sup>16</sup>.

The Central Consumer Protection Authority's *Guidelines for Influencers (2023)* and the Supreme Court's subsequent directive to frame *comprehensive online content regulation* together form an emergent corpus of *digital constitutionalism*—a jurisprudence balancing innovation, commercial engagement, and the public good<sup>17</sup>.

## VI. Jurisprudential Resonances and Comparative Insights

The Indian position aligns with global trends distinguishing protected from unprotected forms of expression. In the United States, while the First Amendment provides robust protection to commercial speech, it acknowledges regulatory space for restrictions on false or deceptive advertising (*Central Hudson Gas & Electric Corp. v. Public Service Commission*, 447 U.S. 557, 1980)<sup>18</sup>. The European Court of Human Rights has similarly upheld restrictions under Article 10(2) of the *European Convention on Human Rights* when commercial expression undermines societal morality or order<sup>19</sup>.

India's approach, therefore, while constitutionally unique, resonates with comparative legal standards that prioritize substance over form in determining the constitutional value of speech.

## VII. Doctrinal Implications

The Court's ruling amplifies three key doctrinal dimensions:

### 1. Reaffirmation of the Proportionality Principle

The first doctrinal advance is the reaffirmation of the proportionality principle as the central test for adjudicating restrictions on free speech. The Court reiterated that limitations imposed by the State must pursue a legitimate constitutional objective, be necessary to

achieve that objective, and remain proportionate in their scope and effect (*Modern Dental College v. State of Madhya Pradesh*, 2016; *K.S. Puttaswamy v. Union of India*, 2017).

This proportionality test ensures that any interference with free expression is not arbitrary or excessive but is guided by reason and constitutional purpose. In applying it to digital and commercial expression, the Court underscored that the State must demonstrate a rational connection between the restriction and the harm addressed, avoiding unnecessary encroachments on individual autonomy.

### 2. Functional Segmentation of Speech

The second doctrinal contribution involves the functional segmentation of speech, recognizing that not all forms of expression hold equal constitutional value. The Court distinguished between core democratic expression—such as political critique, journalistic investigation, and artistic creativity—and commercial or socially harmful expression, which may legitimately attract greater regulation.

This conceptual approach mirrors developments in comparative constitutional law, including the commercial speech doctrine established in *Virginia State Board of Pharmacy v. Virginia Citizens Consumer Council* (1976) and the contextual proportionality analysis of the European Court of Human Rights.

### 3. Institutional Responsibility and Digital Governance

The third doctrinal innovation lies in the Court's articulation of institutional responsibility in digital governance. In a landscape dominated by artificial intelligence, social media, and algorithmic communication, the Court emphasized the positive duty of the State to ensure that freedom of expression does not devolve into misinformation, hate speech, or moral injury.

Rather than perceiving regulation as censorship, the judgment reframed it as a constitutional obligation to maintain the authenticity, safety, and inclusiveness of the



digital public sphere. This approach mirrors the emerging global doctrine of digital constitutionalism, which calls for transparent, accountable, and rights-oriented governance of digital platforms (Celeste, 2019).

For instance, laws regulating deepfake videos or AI-generated misinformation are not viewed as suppressing speech but as protecting the integrity of democratic discourse and preventing social disorder.

The Court thus marked a jurisprudential evolution toward constitutional modernity, where traditional freedoms are interpreted dynamically to respond to new technological contexts.

Collectively, these doctrinal shifts redefine India's constitutional understanding of speech and expression. By reinforcing proportionality, differentiating functional categories of speech, and acknowledging the State's institutional duty in digital governance, the judgment situates Indian jurisprudence within a global constitutional conversation. It elevates freedom of expression from a static liberty to a living constitutional principle, capable of balancing autonomy, accountability, and technological progress in equal measure.

### VIII. Conclusion

The Supreme Court's contemporary reaffirmation that commercial and prohibited speech shall not be shielded under Article 19(1)(a) underscores a mature and responsible vision of constitutional liberty. It reflects a deeper jurisprudential understanding that democracy thrives not through absolute license but through moral and normative discipline. As India advances into the digital epoch, this decision equips the constitutional framework to address emerging complexities of commercial inducement, online abuse, and societal fragmentation.

Ultimately, the Court has reasserted that freedom of speech, although sacred, is a *qualified right* bound by the imperatives of decency, accountability, and public order—a

proposition entirely harmonious with the Constitution's transformative character.

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