



Gandhian Principles in The Directive Principles of State Policy: A Constitutional Analysis of their Relevance and Contemporary Significance

Dr. M.A. Saleem Ahmed^a, Mr. Mohamed Hussain Ali^b

^aHead of the Department, Crescent School of Law, Madurai

^bStudent, Crescent School of Law, Chennai

ABSTRACT :

The Directive Principles of State Policy contained in Part IV of the Constitution of India represent the constitutional commitment to social and economic democracy. Among the different intellectual influences reflected in the Directive Principles, Gandhian philosophy occupies a distinctive position. The ideals of *Gram Swaraj*, rural self-reliance, dignity of labour, social upliftment, public health and agricultural welfare find constitutional expression particularly in Articles 40, 43, 46, 47 and 48. Although these provisions are expressly non-justiciable under Article 37, they have acquired substantial constitutional significance through legislation, constitutional amendments and judicial interpretation. This paper examines the Gandhian foundations of selected Directive Principles and analyses their transformation within Indian constitutionalism. Particular attention is given to Article 40 and democratic decentralisation, Article 43 and rural economic development, Article 46 and social justice, Article 47 and public health, and Article 48 and agriculture. The paper further examines the evolving relationship between Directive Principles and Fundamental Rights through landmark decisions including *State of Madras v Champakam Dorairajan*, *Kesavananda Bharati v State of Kerala*, *Minerva Mills Ltd v Union of India* and *Municipal Council, Ratlam v Vardhichand*. It argues that the contemporary relevance of Gandhian constitutionalism does not lie in mechanically reproducing Gandhi's historical socio-economic model, but in adapting the underlying values of decentralised democracy, social justice, dignity of labour, self-reliance and human-centred development to present constitutional and socio-economic realities.

Keywords: *Gandhian Philosophy, Directive Principles of State Policy, Gram Swaraj, Article 40, Article 43, Article 46, Article 47, Article 48, Constitutionalism, Social Justice.*

1. Introduction

The Constitution of India is not merely an instrument for establishing governmental institutions and distributing political power. It is also a transformative document intended to create a social order founded upon justice, equality, dignity and welfare. The Fundamental Rights guarantee individual freedoms, whereas the Directive Principles of State Policy establish the broader social and economic objectives towards which the State is expected to direct its governance.

Article 37 occupies a particularly important position in this constitutional scheme. It declares that the provisions contained in Part IV shall not be enforceable by any court, but simultaneously states that they are "fundamental in the governance of the country" and that it shall be the duty of the State to apply them in making laws.¹ Consequently, the non-justiciability of the Directive Principles does not imply constitutional insignificance. They represent standards of governance and provide the normative framework for the transformation of Indian society.

The influence of Mahatma Gandhi can be identified particularly in provisions dealing with village self-government, cottage industries, weaker sections, public health and agriculture. Article 40 directs the State to organise village panchayats as units of self-government. Article 43 seeks to secure a living wage and decent conditions of life and specifically promotes cottage industries in rural areas. Article 46 concerns the educational and economic interests of weaker sections. Article 47 gives importance to nutrition, standard of living and public health, while Article 48 addresses agriculture and animal husbandry.²

The Constitution, however, cannot be described as an exclusively Gandhian document. It represents a synthesis of several intellectual traditions, including liberalism, socialism, Gandhian thought, parliamentary democracy and constitutionalism. Gandhian principles must therefore be examined as part of a broader constitutional philosophy.

¹ Constitution of India 1950, art 37.

² Constitution of India 1950, arts 40, 43, 46, 47 and 48.

The central argument of this paper is that Gandhian principles continue to possess constitutional relevance because they provide a normative framework for decentralised governance, inclusive development, dignity of labour and social welfare. Their contemporary significance, however, depends upon a dynamic interpretation capable of responding to technological development, urbanisation, economic globalisation and changing social conditions.

2. Gandhian Philosophy and Constitutional Thought

Gandhi's understanding of *Swaraj* extended beyond the attainment of political independence. *Swaraj* involved responsible self-government and the capacity of individuals and communities to participate meaningfully in decisions affecting their lives. His conception of *Gram Swaraj* placed the village at the centre of democratic and social organisation.

The village, in Gandhi's political philosophy, was not merely an administrative unit. It was intended to become a self-reliant community capable of managing its local affairs through participatory institutions. This philosophy subsequently found constitutional expression in Article 40.

Gandhian economic thought was similarly concerned with decentralisation. Gandhi emphasised village industries, productive labour, self-reliance and economic opportunities for ordinary people. His approach was critical of excessive concentration of economic power and of development models that treated human beings merely as instruments of production.

The Gandhian principle of *Sarvodaya*, or the welfare and upliftment of all, also corresponds with the constitutional commitment to social justice. Article 46, in particular, reflects the objective of protecting disadvantaged communities against social injustice and exploitation.

Thus, Gandhian philosophy influenced the Constitution not through the wholesale adoption of Gandhi's political programme but through the incorporation of certain normative objectives into the constitutional structure.

3. Article 40 and the Constitutional Idea of Gram Swaraj

Article 40 provides that the State shall take steps to organise village panchayats and endow them with such powers and authority as may be necessary to enable them to function as units of self-government.³

Among the Directive Principles, Article 40 provides perhaps the clearest constitutional expression of Gandhian political thought. Gandhi regarded genuine democracy as a process that must operate from the grassroots upwards rather than merely from national and state institutions downwards.

For several decades after the commencement of the Constitution, however, Panchayati Raj remained substantially dependent upon State legislation and administrative policy. The position changed fundamentally with the Constitution (Seventy-Third Amendment) Act, 1992, which inserted Part IX and gave constitutional status to Panchayats.

The constitutional recognition of Gram Sabhas, regular elections, reservation, State Election Commissions, State Finance Commissions and the Eleventh Schedule transformed Article 40 from a broad constitutional aspiration into the basis of a constitutionally recognised system of local government.

This development is constitutionally significant because it demonstrates that a Directive Principle can influence institutional evolution even though it is not itself judicially enforceable. Article 40 therefore provides an important example of the interaction between constitutional aspiration and institutional transformation.

Nevertheless, the existence of elected Panchayats cannot by itself be equated with Gandhian Gram Swaraj. Genuine self-government requires meaningful devolution of financial, administrative and functional authority. Without adequate resources and decision-making powers, local bodies may remain dependent upon higher levels of government.

The contemporary understanding of Gram Swaraj must also recognise that the village is not necessarily an egalitarian social space. Caste hierarchies, gender inequality and local economic domination may undermine genuine participation. Therefore, Gandhian decentralisation must operate within the constitutional commitments to equality, dignity and non-discrimination.

4. Article 43 and Gandhian Economic Self-Reliance

Article 43 directs the State to endeavour to secure a living wage and decent conditions of work and to promote cottage industries in rural areas.⁴ The provision closely corresponds with Gandhi's emphasis on rural economic self-reliance.

For Gandhi, cottage industries were not merely mechanisms for employment generation. They were connected with dignity of labour, community self-

³ Constitution of India 1950, art 40.

⁴ Constitution of India 1950, art 43.

reliance and the decentralisation of economic power. The economic dignity of ordinary people was considered essential to meaningful political freedom.

The contemporary relevance of Article 43 should not, however, be assessed by asking whether India should return to a pre-industrial economy. Such an approach would treat Gandhian thought as a fixed historical programme rather than a constitutional philosophy.

The underlying constitutional principle is more enduring: economic development should provide meaningful livelihood opportunities and should not result in the systematic exclusion of rural and economically weaker communities.

Modern rural enterprises, self-help groups, farmer-producer organisations, handicraft businesses, food-processing units and technology-enabled micro-enterprises can therefore be viewed as contemporary manifestations of the principle underlying Article 43.

Technology need not necessarily undermine Gandhian economic thought. Digital markets can enable rural producers and artisans to reach consumers beyond their geographical communities. In this sense, technology can become an instrument of economic decentralisation rather than merely an instrument of economic concentration.

Article 43 should therefore be understood as embodying a constitutional concern for dignified and inclusive economic development.

5. Article 46 and Gandhian Social Justice

Article 46 directs the State to promote with special care the educational and economic interests of the weaker sections of the people and to protect them from social injustice and exploitation.⁵

This provision reflects the Gandhian concern with social upliftment. Political independence, from a Gandhian perspective, would remain incomplete if sections of society continued to experience social exclusion and economic exploitation.

The constitutional significance of Article 46 lies in its movement beyond formal equality towards substantive equality. The Constitution recognises that individuals situated in historically disadvantaged circumstances may require affirmative measures in order to participate meaningfully in social, political and economic life.

The principle also has a close relationship with constitutional provisions concerning affirmative action and political representation. Reservations in educational institutions, public employment and local government institutions may therefore be understood within the broader constitutional commitment to social transformation.

At the same time, contemporary constitutionalism requires that social upliftment should not become paternalistic welfare. The objective should be empowerment. Access to quality education, economic opportunity, political participation, social security and justice are necessary components of meaningful constitutional equality.

Article 46 consequently demonstrates that Gandhian social philosophy continues to have relevance where constitutional democracy seeks to transform structural disadvantage rather than merely prohibit formal discrimination.

6. Article 47 and the Gandhian Conception of Public Welfare

Article 47 declares that the State shall regard the raising of the level of nutrition and the standard of living and the improvement of public health as among its primary duties.⁶

The provision reflects a broader conception of welfare in which the State has responsibility for creating conditions necessary for a dignified life.

The judicial development of Article 21 has significantly strengthened this principle. In *Municipal Council, Ratlam v Vardhichand*, the Supreme Court addressed municipal sanitation and public-health obligations and refused to accept financial difficulties as a sufficient justification for failure to address serious public-health concerns.⁷

The importance of this judgment extends beyond municipal sanitation. It demonstrates the manner in which Directive Principles can influence the interpretation and enforcement of Fundamental Rights.

⁵ Constitution of India 1950, art 46.

⁶ Constitution of India 1950, art 47

⁷ *Municipal Council, Ratlam v Vardhichand* (1980) 4 SCC 162

The constitutional understanding of public health has subsequently expanded. Health cannot be confined to the availability of hospitals or medical treatment. It encompasses nutrition, sanitation, clean water, preventive healthcare, occupational safety and environmental conditions necessary for human well-being.

This development is consistent with the Gandhian emphasis on the welfare of ordinary people. Article 47 therefore remains relevant to contemporary questions concerning public health inequality, malnutrition, occupational health and access to essential services.

The provision concerning prohibition must also be understood carefully. While Gandhi strongly opposed intoxicating substances, contemporary constitutional analysis requires consideration of individual autonomy, public health, regulation, livelihood and state revenue. The underlying constitutional concern should therefore be understood primarily as the protection of public health and social welfare.

7. Article 48 and Agriculture

Article 48 directs the State to organise agriculture and animal husbandry on modern and scientific lines and contains provisions relating to cattle preservation.⁸

Agriculture occupies a particularly important position within Gandhian thought because rural economic life, agricultural labour and village self-reliance were central to his vision of India.

The contemporary interpretation of Article 48 must, however, account for scientific development and environmental concerns. Modern agriculture must address productivity while simultaneously responding to soil degradation, water scarcity, climate change, biodiversity loss and the economic vulnerability of small farmers.

The constitutional expression "modern and scientific" should therefore not be interpreted as requiring unlimited industrialisation. Scientific agricultural development must remain consistent with the broader constitutional objectives of human welfare and environmental protection.

The Supreme Court's decision in *State of Gujarat v Mirzapur Moti Kureshi Kassab Jamat* illustrates the significance of Article 48 in constitutional adjudication concerning cattle preservation.⁹ The case also demonstrates that Directive Principles may legitimately inform the assessment of legislative policy while remaining subject to other constitutional guarantees.

Article 48 thus remains relevant not merely to cattle preservation but to the broader constitutional question of how agriculture should be organised in a manner that is economically productive, socially responsible and environmentally sustainable.

8. Directive Principles and Fundamental Rights: From Conflict to Constitutional Harmony

The constitutional status of the Directive Principles has evolved considerably through judicial interpretation.

In *State of Madras v Champakam Dorairajan*, the Supreme Court adopted an approach under which Fundamental Rights prevailed over Directive Principles in the event of conflict.¹⁰ This reflected the initial constitutional distinction between enforceable rights and non-enforceable directives.

The relationship subsequently developed through constitutional jurisprudence.

In *Kesavananda Bharati v State of Kerala*, the Supreme Court recognised the basic structure doctrine and emphasised the importance of preserving the fundamental constitutional identity of the Constitution.¹¹

The principle of harmony was more explicitly developed in *Minerva Mills Ltd v Union of India*. The Supreme Court held that the Constitution is founded upon a balance between Fundamental Rights and Directive Principles and that destroying this balance would damage the constitutional structure itself.¹²

This principle is particularly important in assessing Gandhian constitutionalism.

Gandhian objectives cannot be used to justify the destruction of individual liberty. At the same time, Fundamental Rights cannot be interpreted in a manner that renders the Constitution incapable of addressing poverty, inequality and social deprivation.

⁸ Constitution of India 1950, art 48

⁹ *State of Gujarat v Mirzapur Moti Kureshi Kassab Jamat* (2005) 8 SCC 534

¹⁰ *State of Madras v Champakam Dorairajan* AIR 1951 SC 226.

¹¹ *Kesavananda Bharati v State of Kerala* (1973) 4 SCC 225.

¹² *Minerva Mills Ltd v Union of India* (1980) 3 SCC 625

The constitutional position is therefore neither absolute supremacy of Fundamental Rights nor absolute supremacy of Directive Principles. It is **constitutional harmony**.

This represents a significant evolution from the earlier approach in *Champakam Dorairajan* and establishes the contemporary constitutional position that Parts III and IV must be read together.

9. Gandhian Principles and Contemporary Constitutionalism

The continuing relevance of Gandhian principles can be understood through the broader transformation of Indian constitutionalism.

First, the constitutionalisation of Panchayati Raj demonstrates the continuing relevance of decentralised democracy. Article 40 is no longer merely an aspirational provision; it has contributed to the creation of constitutionally recognised institutions of local self-government.

Second, Article 43 remains significant in the context of informal employment and rural livelihoods. India's economic transformation has not eliminated the need to protect workers whose livelihoods remain insecure.

Third, Article 46 continues to provide constitutional justification for measures addressing structural disadvantage.

Fourth, Article 47 reinforces the proposition that public health and nutrition are central responsibilities of the State.

Fifth, Article 48 provides a constitutional foundation for integrating agricultural development with scientific knowledge and sustainability.

These provisions demonstrate that the Gandhian dimension of the Constitution is not confined to historical symbolism. It continues to influence questions of governance, economic policy and social justice.

10. Critical Constitutional Assessment

The continuing relevance of Gandhian principles should not result in an uncritical idealisation of Gandhi's village-centred vision.

The first limitation arises from Article 37 itself. Directive Principles are not directly enforceable by courts. Their implementation consequently depends substantially upon legislative and executive action.

The second limitation concerns the transformation of Indian society. Contemporary India is increasingly urbanised, technologically connected and integrated into global economic systems. A literal return to village-based economic self-sufficiency would be neither feasible nor constitutionally necessary.

The third limitation concerns the social structure of villages. Decentralisation may strengthen democracy, but it may also reproduce existing local inequalities if adequate constitutional safeguards are absent.

For these reasons, Gandhian principles should be interpreted dynamically. The constitutional value of Gram Swaraj lies in participatory democracy, not geographical isolation. The value of cottage industries lies in dignified and decentralised livelihoods, not rejection of technology. The value of self-reliance lies in economic empowerment, not economic isolation.

The contemporary Constitution therefore permits a synthesis between Gandhian values and technological and economic modernisation.

11. Conclusion

The Gandhian influence upon the Directive Principles of State Policy represents an important dimension of Indian constitutionalism. Articles 40, 43, 46, 47 and 48 reflect constitutional commitments to decentralised democracy, rural economic development, social justice, public health and agricultural welfare.

Their constitutional significance has increased through both institutional and judicial development. The 73rd Constitutional Amendment transformed the principle of village self-government into a constitutionally recognised system of local governance. Judicial decisions have progressively integrated Directive Principles into the interpretation of Fundamental Rights, culminating in the constitutional principle of harmony articulated in *Minerva Mills*.

The contemporary relevance of Gandhian constitutionalism, therefore, does not depend upon reproducing Gandhi's historical economic or political model. Its relevance lies in the continuing constitutional values that underlie his philosophy: decentralisation, dignity of labour, social responsibility, self-reliance, welfare of vulnerable communities and development directed towards human well-being.

The Constitution does not require India to choose between Gandhi and modernity. Rather, it provides a framework within which Gandhian values can be adapted to contemporary conditions. Gram Swaraj can coexist with digital governance; rural industries can utilise modern technology; scientific agriculture can incorporate environmental sustainability; and social welfare can be transformed into genuine empowerment.

The enduring significance of Gandhian principles is therefore found in their ability to provide an ethical dimension to constitutional governance. They remind the State that development is not an end in itself. The ultimate constitutional measure of development is whether it enhances human dignity, democratic participation, social justice and the welfare of all.

The Constitution of India is not merely an instrument for establishing governmental institutions and distributing political power. It is also a transformative document intended to create a social order founded upon justice, equality, dignity and welfare. The Fundamental Rights guarantee individual freedoms, whereas the Directive Principles of State Policy establish the broader social and economic objectives towards which the State is expected to direct its governance.

Article 37 occupies a particularly important position in this constitutional scheme. It declares that the provisions contained in Part IV shall not be enforceable by any court, but simultaneously states that they are "fundamental in the governance of the country" and that it shall be the duty of the State to apply them in making laws.¹³ Consequently, the non-justiciability of the Directive Principles does not imply constitutional insignificance. They represent standards of governance and provide the normative framework for the transformation of Indian society.

The influence of Mahatma Gandhi can be identified particularly in provisions dealing with village self-government, cottage industries, weaker sections, public health and agriculture. Article 40 directs the State to organise village panchayats as units of self-government. Article 43 seeks to secure a living wage and decent conditions of life and specifically promotes cottage industries in rural areas. Article 46 concerns the educational and economic interests of weaker sections. Article 47 gives importance to nutrition, standard of living and public health, while Article 48 addresses agriculture and animal husbandry.¹⁴

The Constitution, however, cannot be described as an exclusively Gandhian document. It represents a synthesis of several intellectual traditions, including liberalism, socialism, Gandhian thought, parliamentary democracy and constitutionalism. Gandhian principles must therefore be examined as part of a broader constitutional philosophy.

The central argument of this paper is that Gandhian principles continue to possess constitutional relevance because they provide a normative framework for decentralised governance, inclusive development, dignity of labour and social welfare. Their contemporary significance, however, depends upon a dynamic interpretation capable of responding to technological development, urbanisation, economic globalisation and changing social conditions.

Acknowledgements

Acknowledgements and Reference heading should be left justified, bold, with the first letter capitalized but have no numbers. Text below continues as normal. The authors sincerely acknowledge the support and encouragement extended by the faculty and administration of Crescent School of Law in completing this research work.

REFERENCES

1. Constitutional and Statutory Sources

Constitution of India, 1950, arts 37, 40, 43, 46, 47 and 48.
Constitution (Seventy-Third Amendment) Act, 1992.
Constitution (Ninety-Seventh Amendment) Act, 2011.

2. Judicial Authorities

State of Madras v Champakam Dorairajan, AIR 1951 SC 226.
Kesavananda Bharati v State of Kerala, (1973) 4 SCC 225.
Municipal Council, Ratlam v Vardhichand, (1980) 4 SCC 162.
Minerva Mills Ltd v Union of India, (1980) 3 SCC 625.
Olga Tellis v Bombay Municipal Corporation, (1985) 3 SCC 545.
Unni Krishnan, JP v State of Andhra Pradesh, (1993) 1 SCC 645.
Paschim Banga Khet Mazdoor Samity v State of West Bengal, (1996) 4 SCC 37.
State of Gujarat v Mirzapur Moti Kureshi Kassab Jamat, (2005) 8 SCC 534.
Bhanumati v State of Uttar Pradesh, (2010) 12 SCC 1.

3. Books

Granville Austin, *The Indian Constitution: Cornerstone of a Nation* (Oxford University Press, 1966).
H M Seervai, *Constitutional Law of India* (Universal Law Publishing).
M P Jain, *Indian Constitutional Law* (LexisNexis).
D D Basu, *Introduction to the Constitution of India* (LexisNexis).

¹³ Constitution of India 1950, art 37.

¹⁴ Constitution of India 1950, arts 40, 43, 46, 47 and 48.

B Shiva Rao, *The Framing of India's Constitution: Select Documents* (Universal Law Publishing).
Mahatma Gandhi, *Hind Swaraj or Indian Home Rule* (1909).