RESERVATION IN THE 21ST CENTURY: TEMPORARY MEASURE OR PERMANENT NECESSITY?

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ABSTRACT

The reservation policy in India has transitioned from being a temporary corrective measure to an enduring characteristic of its socio-legal mechanism. Originally envisioned by Dr. B.R. Ambedkar as an instrument of social justice to address historic margianlization, reservations were meant to end once equality was achieved. However, over seven decades of constitutional amendments, judicial interpretations and empirical studies shows that inequality persists across caste, class and religion, thereby complicating the view of temporariness. This paper critically evaluates whether reservations in the 21st century remain a constitutional mandate or have become a self-perpetuating mechanism. Drawing upon constitutional provisions, landmark Supreme Court judgements such as Indra Sawhney, Ashoka Thakur and Janhit Abhiyan and the findings of major commissions such as Mandal, Sachar and Rohini and the study evaluates the policy's continues relevance. It further situates India's affirmative action within a comparative framework of global practices in the United States and South Africa. The analysis concludes that while reservations continues to serve an important balancing function, their future effectiveness depends on reforms that ensure a timely review, intra-group equity and a revolution towards wider anti-discrimination and opportunity based frameworks.

Keywords: Reservation, Social Justice, Equality, Constitutional Law, India, Affirmative Action.

1. INTRODUCTION

The discussion regarding the reservation policy in India is deeply connected to the idea of equality and social justice as being part of the Constitution of India. Dr. B.R.Ambedkar, who was one of the key figures in the fight for equality in India, visioned a model of positive discrimination which essentially means providing the reservation for groups that had suffered historic injustice and were still at the lower sections of society.Such kind of measures were intended to be temporary and should be ceased when backwardness ceased rather than remaining as permanent fixtures is one argument. This claim has been repeated in the political arena and popular discourse, often citing an alleged 10 year "sunset clause" in reservations. In reality, Ambedkar's speeches in the Constituent Assembly explicitly made clear that he opposed the rigid deadlines. As one of the commentor observed, Ambedkar "was not in favour of any time limit" on reservations for Dalits and that he decided proposals cap them at ten years duration , invoking Burke's warning that "*large empires and small minds go ill together".*[1]

Nonetheless, constitutional practice has repeatedly extended and expanded reservation. Over the past seven decades, the Indian state has upheld and expanded the quotas for Scheduled Castes, Scheduled Tribes, and Other Backward Classes. This paper examines whether the continued need for reservation in the 21st century reflects its success or its inadequacy. In specific, the consideration whether the contemporary evidence and law treats reservation as an indefinite necessity or whether it can remain within a framework of the evolving time-bound measures. In order to evaluate this question in the Indian context we began by exploring the constitutional provisions, landmark judgments and empirical data that bear on this issue. We also survey the comparative affirmative action models by briefly touching on the U.S. and South Africa in order to contextualize this question. This paper then concludes with a critical discussion and a proposed path forward for making reservation effective and equitable if it is to endure.

RESEARCH PROBLEM

Isn't it paradoxical if the reservations were originally intended to be temporary, but they were ultimately made permanent with the assistance of different articles amended (Article 334,

[1] CONSTITUENT ASSEMBLY DEBATES, vol. XI, at 979 (Aug. 25, 1949) (speech by Dr. B.R. Ambedkar).

Article 15(4), Article 15(5), Article 16(4A), Article 16(4B), and now Article 15(6) and Article 16(6))?

RESEARCH OBJECTIVES

1. To identify the historical and constitutional transition of reservation from a temporary corrective measure to its contemporary state.

2. To evaluate the important judicial decisions, constitutional amendments and commission reports that have impacted the reservation policy

3. To assess the present empirical data to analyse whether reservations remain a constitutional necessity.

4. To engage with theoretical and comparative views to initiate a future methodology for an affirmative action in India.

METHODOLOGY

The research adopts a doctrinal and analytical methodology. Primary sources consists of constitutional provisions, Supreme Court's landmark judgements and the official reports like Mandal Commission, Sachar Committee, Rohini Commission. Secondary sources referred includes academic commentaries, legal scholarship and comparative studies of affirmative action frameworks in the United States and South Africa.

This study relies on qualitative analysis of the legal texts, judicial reasoning and socio-legal data in order to evaluate the evolution, persistence and future of reservation policies in India.

THESIS STATEMENT

This paper argues that while reservations are considered as constitutionally necessary in order to address the continuing structural inequalities, their persistent legitimacy in the 21st century relies on targeted reforms. These reforms should target on periodic review, intra-group equity by sub-categorisation, creamy layer expansion and complementary anti-discrimination frameworks to make sure that the policy remains as both just as well as effective.

CONSTITUTIONAL AND HISTORICAL FRAMEWORK

The Indian Constitution directly authorizes the state for making "special provision" for the development of the disadvantaged groups. The meaning of Article 15(4) is that "the State is not disallowed by that provision to make special treatments for the better making of the socially and educationally backward classes of citizens or for the Scheduled Castes and the Scheduled Tribes"[2] . In the same way, Article 16(4) opens the door to reservations in public service for any backward class "which at the option of the State is not adequately represented in the services of the State".[3]. These clauses were inserted in the beginning of the Republic in order to permit affirmative action. There were time limits on certain provisions in the initial stage : Articles 330 and 332 (reservation of parliamentary and assembly seats for SC/ST) included a ten-year "sunset clause" that Parliament could extend. Article 334 also similarly provided that these reserved seats and nominations for Anglo-Indians that would cease after ten years duration from the Constitution's commencement. Subsequent constitutional amendments (23rd, 45th, 62nd, 79th, 95th and 102nd Amendments) repeatedly extended Article 334 and most recent extension being 80 years for SC/ST seats in the legislatures[4]. To put it simply, what began as a provisional arrangement has now became as an effectively permanent, measure or at least until 2030 for SC/ST seats.

Among the Directive Principles, Article 46 directs the State government to promote the weaker sections of people, specifically, the Scheduled Castes and the Scheduled Tribes and their educational and economic interests with due care.[5]Although this article is non-justiciable as it undermines the idea of upliftment. Also, there is no specified constitutional time-limit on these commitments is a point to be noted. Indeed, as emphasized by the Supreme Court, the Directive Principles and the Preamble indicate a dynamic understanding of the concept of equality that it tolerates special measures[6].

The Constitution's language has also been expanded over the years. On the other side, the purpose of Article 15(4) is "the State can make a special treatment for the advancement of socially and educationally backward classes of citizens or for the Scheduled Castes and the Scheduled Tribes". Similarly, Article 16(4) allows reservations like special treatment in public

[2] INDIA CONST. art. 15.
[3] INDIA CONST. art. 16
[4] INDIA CONST. art. 334
[5] INDIA CONST. art. 46
[6] *Ashoka Kumar Thakur v. Union of India*, (2008) 6 S.C.C. 1

service for any backward class, "which in the opinion of the State is not adequately represented in the services of the State". Therefore, in the recent decades, reservations have not been withered but has grown in scope and reach.

It is thereby important to note what these provisions state and not about the concept of duration. None of the above mentioned articles specify an end date or a mandatory review to be held on reservations. In fact, the 93rd and 103rd Amendments openly permits for the allowance of reservations, but subject to a maximum of ten percent limit, in addition to existing quotas[7]. Only Article 334 has imposed a time-limit on the legislative seats but that too has been extended and remains tied to the periodic constitutional action. Therefore, the Constitution neither promotes an automatic phase out of the general reservations nor does it impose any kind of restriction on them. Thus, the legal question of temporariness is therefore not settled by the text but through interpretation and policy.

EMPIRICAL EVIDENCE AND COMMISSION REPORTS

MANDAL COMMISSION

Any kind of evaluation regarding reservation's future should be computed in relation with the contemporary data sets on inequality and backwardness. The Mandal Commission (1979-80) which conducted the first major enquiry into the backward classes and estimated that the Other Backward Classes (OBCs) constituted about 52% of India's population (excluding SC/'ST)[8]. In relation of this figure, Mandal commission recommended a 27% reservation in public employment and higher education for OBC. It also agreed on the fact that due to the Supreme Court's decision on the 50% cap, the current reservation of 27% was less than their share in the total population. Its recommendations which were implemented in 1990 was contented as being very contentious. Sudden public protests erupted w, indicating the level of public anxiety about the caste-based quotas. The Critics of this concept contented that these kind of wide quotas rather than eradicating, entrenched the problem as many of the OBCs were relatively advanced and developed.

[7] *Janhit Abhiyan v. Union of India*, (2022) 10 S.C.C. 1
[8] *Report of the Backward Classes Commission (Mandal Commission)*, Government of India (1980)

SACHAR COMMITTEE

The persistence of equality have been documented subsequently by the commissions. The Sachar Committee in 2006 had studied the socio-economic status of Muslims and realised a "deplorable" kind of situation. Remarkably, 40.7% of the Indian Muslims were identified as Muslim-OBCs as per the commission's lists, constituting 15.7% of the total OBC population[9]. Still their educational and professional representation was drastically low. The Sachar report identified an "terribly low representation of the Muslin OBCs", implying that they haven't benefitted from the general OBC quotas. Ironically, many of the ordinary Muslims including OBC-Muslims lagged behind Hindu OBCs over many indicators such as literacy, income, access to toilets and many more. Sachar recommended that some backwardness arise from systemic factors which are beyond the ambit of caste alone[10], so there should be a wider inclusion like a creation of an Equal Opportunity Commission and diversity index. Importantly it has also recommended altered interventions such as separating Muslims into three categories – Ashrafs, Ajlafs and Arzals and offering different affirmative actions to each of those.

ROHINI COMMISSION

In order to address the intra-group inequality, the Rohini Commission (2017-23) very recently was formed to investigate into the sub-categorization among the OBCs. Its interim findings revealed a distinct imbalance that 97% per cent of the total reserved jobs and seats have reached to 25 per cent of OBC sub-castes, while 983 out of roughly 2,600 OBC communities (37%) had zero representation in the central government and educational institutions[11]. Many of the group were being completely negated, as only a small section (2.68%) of the reserved positions were utilized by approximately 1000 of the OBC castes. The Rohini Commission therefore recommended to divide the OBC reservations into sub-categories and allocating seats to better and worse off groups separately, thereby ensuring fair distribution. Some of the states have already experimented with that kind of sub-categorization like Bihar's split of OBC-I and OBC-II, which reflects recognition that "one size fits all" reservations results in triggering

[9] *Social, Economic and Educational Status of the Muslim Community of India* (Sachar Committee Report), Prime Minister's Office (2006)
[10] Tarunabh Khaitan, *Transcending Reservations: A Paradigm Shift in the Debate on Equality*, 2 *Indian J. Const. L.* 133 (2008)
[11] Vasudha Mukherjee, *Rohini Commission Decoded: Understanding Sub-Categorisation of OBCs*, *Bus. Standard* (Oct. 26, 2023, 4:42 PM)

inequalities.

The persistence of the core problems is signalled by other government data. For example, rural poverty and social indicators among SC/ST communities and remarkably among Muslims and tribal populations, remain remarkably worse than the national averages. The NITI Aayog and other independent studies on inequality including 2030 Sustainable Development Goal targets have continuously emphasizing about the gap in education, health and income for disadvantaged groups. In fact inequality in India is multi-faceted by involving caste, religion, gender and economics. Even the structural disadvantages of certain communities persist when the Gini coefficient may fluctuate. Therefore, the empirical evidence in the 21st century indicates that special measures has not expired and in case of anything, the demand for redress had widened as seen in adding EWS quotas even while resistance to quotas has grown.

SUPREME COURT JURISPRUDENCE ON RESERVATION

The Supreme Court has a key role in structuring reservation policy by often balancing constitutional ideals of equality against the social realities. A landmark case is *Indra Sawhney v. Union of India* also known as the Mandal case(1992), where a nine-judge Bench tussled with the Mandal Commission's OBC quotas. The majority upheld reservations but also laid down some important limits. It confirmed the *creamy layer* exclusion for OBCs and a general 50% ceiling on all of the reservations[12]. As justice J. Thommen said that reserved "must at all times remain well below 50%". Other judges like Jeevan Reddy, Ahmadi, Venkatachaliah and others agreed that the 50% was to be a norm regardless the permit that "extraordinary situations" could justify rare exceptions. Thus Sawhney expressed the opinion that reservation limit indicating that beneficiaries are "adequately represented" under Article 16(4)'s phrase.

Importantly. Sawhney also discussed about temporariness. The judgement declared that reservation must be a short-term measure, the Court ordered that Mandal reservations is to be reviewed after 10 years, i.e. around 2002, thereby suggesting that by then situations should be reassessed. In real, however, Parliament ignored this 2002 review deadline and continued with the quotas. Subsequent legislations and cases have reiterated Sawhney's core fundamental principles, the uphold of the 93rd Amendment's 27% OBC quota including unaided institutions[13], but reiterated that "caste…is currently valid" as a criteria but only on a temporary

[12] Mihir R., *Does the 50% Limit on Reservations in Indra Sawhney Hold Good? (Part II)*, *LiveLaw.in*
[13] *Ashoka Kumar Thakur v. Union of India* (2008)

basis. It controversially also recommended that after 10 years, the "basis of the reservation must be solely based on the financial conditions", indicating a transition from caste to economic criteria. This statement from a five-judge bench was interpreted as linking reservation's future to economic status and indicated at a deadline around 2018. Indeed, one justice remarked that caste-based reservations should "gradually shift towards an economic standard". Thus Ashoka Thakur introduces the idea that caste-based affirmative action should not remain unchanged indefinitely.

For SC/ST reservations and promotions, the Court confirmed Article 16(4A) while placing burdens on states as it required them to demonstrate insufficient representation and backwardness by quantifiable data, and upheld the 50% cap[14]. This connection between reservation and evidence of continuing backwardness was controversial and was subsequently reconsidered. In *Jarnail Singh,* a seven-judge bench unanimously held that states need not collect fresh empirical data to maintain SC/STs in promotions, which means the comparatively advanced among them are excluded from quotas[15]. This underscores that the Court views reservation for SC/ST as a constitutional right to be applied forcefully, even if questions of questions regarding the temporal scope remain open.

The most recent judgement is *Janhit Abhiyan v. Union of India* (2002) regarding the 103rd Amendment i.e., EWS quota. Thus, Janhit Abhiyan represents both a expansion of reservation and the willingness of the majority to override a previous constraint of 50%[16]. It also indicates that reservation can now be granted on solely economic grounds and separate from traditional social identity categories.

In total, Indian jurisprudence has shifted between treating reservation as exceptional and as persistent. On one side, the Court has reinforced reservation's persisting legitimacy and key steps have been upheld, like for example, the 93rd Amendment in Ashoka Thakur, 103rd Amendment in Janhit and the new quotas like EWS have been insisted. On the other hand, the Court has repeatedly framed reservations as one which needs justification, limitation and periodic scrutiny and whether by data in Nagaraj or by legislative renewal by Article 334 extensions. Remarkably, none of the Supreme Court decision has categorically ended reservations and instead, the jurisprudence insisted principles like the adequate representation,

[14] *M. Nagaraj v. Union of India* (2006)
[15] *Jarnail Singh v. Lachhmi Narain Gupta*, (2018) 10 S.C.C. 396
[16] *Janhit Abhiyan v. Union of India*, (2022) 10 S.C.C. 1

not exceeding 50% absent extraordinary clause, that imply reservations are meant to be indefinite in a laissez-faire sense but can and should accommodate to society's change.

THEORETICAL PERSPECTIVES ON EQUALITY AND AFFIRMATIVE ACTION

Doctrinal analysis of the Constitution's language and Court decisions must be paired with theory. Indian reservation policy has been contested as a tension between two views of equality – formal equality of treating all individuals identically versus substantive or compensatory equality of recognizing group disadvantage and providing special help. The Constitution instils both, the guarantee of equality before law under Article 14 parallel to the explicit framing for disadvantaged classes under Articles 15,16. Scholarly observers like Galenter note that Indian law cultivates competing equalities, one equality of outcome like special treatment and competing with another equality of status like no discrimination.

Critics of the everlasting reservation debate that it underscores equal citizenship and merit and effectively framing permanent caste identities. They say that once the original injustice has been repaired or at the very least no longer worsens, reservation should cease to end. In fact, some fear reservation has become as "self-perpetuating" and caste-solidifying". On the other hand, supporters argue that deep-rooted socio-economic differences can't be remedied in a generation. Thet also mention that the Directive Principles and Preamble such as 'fraternity securing the dignity of the individual' in order to justify present affirmative measures.

Academic literature emphasizes this ambivalence. Tarunabh Khaitan cites that for six decades reservations were India's "primary vehicle for fulfilling its constitutional promise of an egalitarian society", but that increasing perpetuates critics as they have called for "transcending reservations" by wide anti-discrimination and diversity steps. For example, Khaitan mentions the recent official shift of proposals such as a national Equal Opportunity Commission or diversity indices, inspired by the Sachar Committee and aim to deal with disadvantage beyond caste quotas. These ideas don't necessarily replace reservation, but also reflect dissatisfaction with an "unidimensional equality model" restricted to quotas. Meanwhile, political theorists insist the moral imperative to raise an uneven playing field as Atul Kohli and others have argued that without structural compensations, formal equality remains empty for millions.

Comparatively, countries like the United States handle affirmative action variably. U.S. law

mandates strict scrutiny for race-based preferences as seen in Grutter v. Bollinger[17], a high bar that aims to make sure "narrow tailoring" and time-limits, often the Grutter Court mentioned race-conscious admissions must sunset after 25 years. In India, differentially, an affirmative action is explicitly constitutionalized and assumed valid until challenged. The U.S. context normally involves no fixed legal expiry on affirmative programs, but courts expect continually justified need. South Africa's post-aparthied constitution similarly mandates affirmative action through Section 9, but permits for long-term Black Economic Empowerment and wide transformation goals. Neither model recommends a prior sunset for remedial policies, instead, the focus is on achieving substantive equality over time. India's debates, however are unique in their scale, like over 50% population covered by some quota and in the constitutional litigation surrounding both its form and durability.

From a constitutional view, one must consider whether reservation itself is a part of the "basic structure" that cant be collapsed. The Supreme Court in Minerva Mills and Kesavananda Bharati, though not directly about reservation, but highlights that the balance of rights and DPSPs is a part of the Constitution's basic structure. Some justices have proposed that restricting reservation by mandating evidence of backwardness protects the structure by ensuring rational application. Others as in Janhit Abhiyan have indicated reservation is a legislative policy choice within constitutional bounds. Thus, judicial theory leans towards preserving reservation as a valid equalizing tool, but within constraining principles.

In short, theory suggests that affirmative action persists so long as inequality thrives. The Indian Constitution seems to declare this ethos, reservations are in one sense "temporary" only insofar as they respond to the persisting need The question, therefore, is empirical and normative, have we reached a time when reservation can be rolled back, or is it still needed indefinitely? As of now, both the data and judicial directions caution that India's social inequalities mandate sustained attention.

CRITICAL DISCUSSION AND PROPOSED PATH FORWARD

The ongoing survey reveals a contradiction. On one hand, legal and political developments have entrenched reservation and its scope has broadened with OBC and EWS additions and its durations have been extended, Article 334's multiple extensions, and courts have generally

[17] *Grutter v. Bollinger*, 539 U.S. 306 (2003)

upheld it as constitutionally valid. On the other hand, both the Supreme Court and commentators have raised concerns about reservation becoming a self-defeating orthodoxy. Indra Sawhney insisted on the 50% ceiling and visioned review; Ashoka Thakur recommended eventually moving to economic criteria; Khaitan documents an official pivot to broader equality measures[18].

A central criticism is that reservation without sunset or renewal can rigidify caste identities and replace the meritocratic ideal. The protest against the OBC quotas in the 1990s and the recent anxiety such as Maratha reservation illustrate public anxiety that quotas be time-bound or periodically justified. Another concern is intra-group inequality, as highlighted by the Rohini report, the OBC reservation pool has been captured by comparatively privileged subgroups. Without reform, the same result could repeat across categories.

However, proponents undermines that inequalities of caste, class and religion remain established. Empirical reports suggests that many groups continue to lag far behind despite decades of reservation. Sachar's findings on Muslims and OBCs, Panagariya's NITI reports and poverty indices show persistent disadvantages. In this view, ending reservation prematurely risks bonding the existing hierarchies.

The 21-st century research problem, then, is not simply whether reservation should continue, but how it should function moving forward. If reservation is to remain, it should become more targeted, evidence-based, and complemented by other measures. Sub-categorisation within broad classes as Rohini recommends can make OBC quotas more equitable. Creamy layer exclusion currently applied to OBC and in promotions to SC/ST could be extended to all quotas to ensure only genuinely backward individuals benefit. Periodic data collection and institutional feedback as earlier envisioned by Sawhney and Nagaraj would allow adjustment of the quotas to current realities. The suggested Equal Opportunity Commission and diversity indicates point to remedies beyond quotas, addressing discrimination in hiring, allowing access to non-reserved avenues like scholarships, coaching and infrastructure and tacking deprivation at the foundations.

Comparative experience teaches that affirmative action is ideally one component of a holistic strategy. In the U.S., for instance, legal measures are coupled with policy programs like

[18] *Indra Sawhney v. Union of India*, 1992 Supp. (3) S.C.C. 217

scholarships, tutoring, anti-discrimination enforcement. India has also expanded beyond quotas, initiatives like targeted scholarships, hostels for deprived students, industry-specific training and schemes under Article 46 aim at the same goals. These should not be outshine by the quota debate.

In the important analysis, one must also address political misuse. Reservation has often been politicized, with new quotas created for electoral gain, for example Marathas, Jats and Gujjars rather than genuine acknowledgement. Any result must instil reservation policy from such apprehension. This recommends de-politicizing the process, basing quotas on neutral criteria like income, education levels alongside caste, involving independent experts and setting clear objectives and timelines.

The proposed solution, given the mixed evidence like the desired approach is neither immediate abolition nor is blind perpetuation of the existing quotas. Instead, reservation should be seen as a conditional, adaptable framework. We propose measures such as statutory periodic review of all reservation provisions like every 10 years by the independent commissions in order to assess the impact and continued need and second, sub-categorisation within each of the reserved class to make sure the intra-group equity as per Rohini and third, expansion of the "creamy layer" rule in order to cover all categories and ensuring the least advantaged within each group benefit and fourth, parallel focus on non-quota measures like equal opportunity laws and the affirmative incentives for diversity in the private sector and socio-economic development programs for the disadvantaged communities and lastly, possibly sunset clauses that mandate re-legislation of quotas from time to time, forcing explicit legislative reconsideration as exists in Article 334 rather than automatic extension. These measures aim to align reservation with actual need and efficiency.

At the same time, reservation as a principle shouldn't be abandoned. The Supreme Court's recent affirmation of EWS quotas indicates a recognition that disadvantage has both caste and class dimensions. Any retreat from reservation should incremental and not rash. As the Court has said, "social justice" is a key element in constitutional objective and unless our society attains a genuine equality of opportunity, reservations remain a necessary instrument. The real question is making them more rational, just and effective.

CONCLUSION

Reservation policy in India has evolved dynamically since the period of Independence. It began as a unique and time-bound remedy for historical wrongs, but has become a foundation of the constitutional order. Presently, with India's complex social landscape and persistent inequalities, reservation continues to be argued as both an imperative and an abnormal. The doctrinal and theoretical evaluation above recommends that a permanent cessation of all quotas would be premature but the existing system can't remain static. The reforms proposed like the periodic review, sub-categorisation, broad anti-discrimination steps, offer a way to renew reservation's valuation. In sum, reservation in the 21st century should be treated neither as an unquestioned permanent recognition nor as a artefact because of expiration but as an evolving mechanism. It must respond to changing social artefacts and constitutional values, balancing the goal of substantive with the principle of equal opportunity for all.

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