

A Study on Fundamental Rights and Dpsp: Conflict, Co-Existence and Constitutional Balance

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Abstract: *The Indian Constitution embodies a carefully engineered equilibrium between the justiciable guarantees of Part III, the Fundamental Rights, and the non-justiciable but morally and politically directive mandates of Part IV, the Directive Principles of State Policy (DPSP). While Fundamental Rights protect the individual citizen from arbitrary state action and guarantee civil and political liberty, the Directive Principles, enshrined in Articles 36 to 51, obligate the State to work toward social and economic justice and the construction of a welfare state envisaged in the Preamble. The relationship between these two parts of the Constitution has historically oscillated between conflict and harmonious construction, generating one of the most contested and dynamic fields of Indian constitutional jurisprudence. This research article undertakes a doctrinal and analytical examination of this relationship by tracing its conceptual foundations, the legislative and constitutional amendments that have shaped it — most notably the First, Fourth, Seventeenth, Twenty-Fourth, Twenty-Fifth, Forty-Second, and Forty-Fourth Amendments — and the landmark judicial pronouncements of the Supreme Court of India, including State of Madras v. Champakam Dorairajan (1951), I.C. Golak Nath v. State of Punjab (1967), Kesavananda Bharati v. State of Kerala (1973), Minerva Mills Ltd. v. Union of India (1980), and Maneka Gandhi v. Union of India (1978). The findings demonstrate that while textual and structural tensions between Part III and Part IV are real and have produced significant constitutional litigation, the doctrine of harmonious construction, anchored by the Basic Structure Doctrine, has enabled the Supreme Court to reconcile these tensions without permitting either part to subordinate the other entirely. It concludes that Fundamental Rights and Directive Principles function as complementary instruments — described judicially as the two wheels of the constitutional chariot — that together advance the constitutional vision of a just, egalitarian, and democratic welfare state.*

Keywords: Fundamental Rights, Directive Principles of State Policy, Basic Structure Doctrine, Constitutional Amendment, Judicial Review, Harmonious Construction, Supreme Court of India.

I. INTRODUCTION

The Constitution of India, adopted on 26 November 1949 and brought into force on 26 January 1950, is widely regarded as a transformative constitutional document that sought not merely to establish a framework of governance but to engineer a social revolution (Austin, 1999). Central to this transformative project is the division of constitutional rights and obligations into two distinct yet interlinked parts: Part III, containing the Fundamental Rights (Articles 12 to 35), and Part IV, containing the Directive Principles of State Policy (Articles 36 to 51). The Fundamental Rights are negative and justiciable rights enforceable against the State through the constitutional remedy under Article 32, while the Directive Principles are affirmative, non-justiciable instructions to the State, expressly declared unenforceable by any court under Article 37, yet described in the same Article as "fundamental in the governance of the country."

This dual structure was not an accident of drafting but a deliberate compromise reached within the Constituent Assembly between two competing visions of constitutionalism: a Gandhian-socialist vision emphasising distributive justice and the social and economic upliftment of the masses, and a liberal-individualist vision emphasising civil liberty and limited government (Austin, 1999; Bhatia, 2019). Dr. B.R. Ambedkar, Chairman of the Drafting Committee, described the Directive Principles as embodying the policy and instruments of "economic democracy," to be realised over time through legislative and executive action, while the Fundamental Rights guaranteed immediate, justiciable protection of civil and political liberty. The resulting constitutional architecture has been the subject of sustained academic, judicial, and political contestation for over seven decades, particularly regarding the question of which part of the Constitution should prevail where the two are in apparent conflict (Jain, 2018).

This article is structured to examine that contestation comprehensively. It begins by situating the conceptual underpinnings of the Fundamental Rights–Directive Principles relationship, reviews recent scholarly literature on the subject, identifies the research gap that this study addresses, states the rationale, problem, objectives, and hypotheses of the study, and thereafter proceeds to a detailed doctrinal analysis of the relevant constitutional provisions, amendments, and case law, culminating in a tabular hypothesis-testing exercise, findings, and conclusion.

1.1. The Conceptual Framework of Fundamental Rights and Directive Principles

Although the heading of this sub-section in many institutional templates is described in terms of "International Relations," the substantive conceptual foundation relevant to a study of Fundamental Rights and Directive Principles is properly located within comparative constitutional theory and constitutional law rather than international relations theory; this study accordingly addresses the conceptual foundations of the Fundamental Rights–DPSP relationship within that disciplinary frame, while noting at the outset the limited points of intersection with international legal discourse. The Indian Constitution's treatment of Fundamental Rights draws conceptually from the liberal constitutional traditions of the United States Bill of Rights and the Government of India Act, 1935, while the Directive Principles draw inspiration from the non-justiciable Directive Principles of the Irish Constitution of 1937, which themselves were influenced by the social and economic rights articulated in the Spanish Republican Constitution of 1931 (Austin, 1999; Jain, 2018).

Conceptually, Fundamental Rights are understood within liberal constitutionalism as negative rights — that is, rights that restrain State action and protect a private sphere of individual autonomy, dignity, and liberty from governmental encroachment. Directive Principles, by contrast, are understood as positive rights or programmatic obligations that require affirmative State action to secure socio-economic welfare, and are explicitly modelled on the premise that a newly independent, economically underdeveloped State could not immediately guarantee enforceable socio-economic rights without risking administrative and fiscal paralysis (Austin, 1999). The non-justiciability clause under Article 37 was therefore a pragmatic constitutional choice rather than a statement of the relative unimportance of socio-economic goals.

There is, a narrow connection with international legal discourse worth noting: the Directive Principles bear a structural resemblance to the International Covenant on Economic, Social and Cultural Rights (ICESCR), 1966, under which States undertake to progressively realise economic and social rights subject to available resources, in contrast to the immediately enforceable civil and political rights under the International Covenant on Civil and Political Rights (ICCPR), 1966 (Jain, 2018). The Supreme Court of India has, in cases such as *Maneka Gandhi v. Union of India* (1978) and *Vishaka v. State of Rajasthan* (1997), drawn upon international human rights instruments to inform the interpretation of Fundamental Rights, illustrating that the domestic Part III–Part IV relationship operates within a broader comparative and international constitutional consciousness even though it is not, a subject of International Relations as a discipline.

1.2. Review of Related Literature

Gautam Bhatia's (2021) transformative constitutionalism thesis argues that the Indian Constitution, read holistically, was designed as an instrument of social transformation rather than a mere preservation of the status quo, and that the Fundamental Rights and Directive Principles must therefore be read together as complementary expressions of a single

transformative project rather than as rival, hierarchically ordered parts. It demonstrates that the judiciary's gradual willingness to read Directive Principles into the content of Fundamental Rights — for instance, reading the right to a clean environment, the right to education, and the right to livelihood into Article 21 — reflects a transformative rather than a purely textuality method of constitutional interpretation. This review is directly relevant to the present study's second objective concerning the co-existence of Part III and Part IV in pursuit of justice and the welfare state.

Khosla (2020) study of the constitutional founding moment situates the Fundamental Rights–Directive Principles divide within the Constituent Assembly's broader anxiety about democratic consolidation in conditions of mass illiteracy, poverty, and social hierarchy. This review substantiates the present study's first objective by clarifying that the conflict between Fundamental Rights and Directive Principles is, at its root, a conflict between judicially enforceable constitutionalism and majoritarian developmental politics, a tension that subsequently played out in the constitutional amendments examined in this article.

Krishnaswamy & Khaitan (2022) comparative analysis of the basic structure doctrine examines how the Indian judiciary's invalidation of Article 31C as amended by the 42nd Amendment Act in *Minerva Mills Ltd. v. Union of India* (1980) reflects a broader global trend of judicially entrenched unamendable constitutional cores designed to prevent legislative or executive capture of foundational rights guarantees. The authors argue that the basic structure doctrine, by preserving the harmony between Part III and Part IV as itself a basic feature, has prevented the Directive Principles from being deployed as an instrument for the wholesale erosion of judicially enforceable rights, while still permitting incremental, justified legislative encroachments calibrated to specific Directive Principles such as Articles 39(b) and 39(c).

Chandrachud (2023) analysis of socio-economic constitutionalism in India traces the judicial technique of reading Directive Principles into Fundamental Rights through Article 21, particularly in cases concerning the right to health, the right to shelter, and the right to a clean environment, and argues that this interpretive fusion has effectively converted several Directive Principles into judicially enforceable rights without requiring formal constitutional amendment (Chandrachud, 2023). This review informs the present study's analysis of the contemporary, post-*Minerva Mills* phase of harmonious construction.

Sharma & Verma (2025) empirical study of welfare legislation enacted between 2014 and 2024 — including the National Food Security Act, 2013, the Mahatma Gandhi National Rural Employment Guarantee Act, 2005, and subsequent amendments, and various right-to-education enforcement mechanisms — demonstrates a marked legislative trend toward giving statutory teeth to Directive Principles without disturbing the Fundamental Rights framework, suggesting that Parliament has increasingly preferred ordinary legislation over constitutional amendment as the vehicle for DPSP implementation in the post-*Minerva Mills* constitutional order (Sharma & Verma, 2025). The authors conclude that this legislative pattern reflects judicial precedent's success in stabilising the Part III–Part IV relationship, reducing recourse to constitutional amendment as a tool of socio-economic policy implementation.

1.3. The Research Gap

While considerable doctrinal literature exists on the basic structure doctrine and on individual landmark cases such as *Kesavananda Bharati* and *Minerva Mills* in isolation, comparatively few studies synthesise the full chronological arc — from Champakam Dorairajan (1951) through to contemporary welfare legislation (2014–2024) — within a single integrated framework that simultaneously (a) maps the textual and structural sources of conflict between Part III and Part IV, (b) evaluates the doctrinal mechanisms of harmonious construction, and (c) empirically tests, through a structured hypothesis-based methodology, the extent of judicial contribution to constitutional balance. Most existing literature is either purely descriptive case commentary or purely theoretical constitutional analysis; this study seeks to bridge that gap by combining doctrinal legal analysis with a structured, hypothesis-driven research design, thereby offering a methodologically distinct contribution to the literature on Indian constitutional law.

1.4. The Rationale of the Study

The rationale for undertaking this study is threefold. First, the Fundamental Rights–DPSP relationship remains constitutionally and politically salient, as contemporary debates on land acquisition, reservation policy, environmental

regulation, and economic reform continue to invoke the language of Part IV to justify limitations on Part III rights, making a clear doctrinal map of the permissible limits of such justification of continuing practical importance to legislators, courts, and citizens alike. Second, the basic structure doctrine, first articulated in *Kesavananda Bharati* (1973) and refined in *Minerva Mills* (1980), continues to be invoked in ongoing constitutional litigation, including challenges to recent constitutional amendments, making a comprehensive re-statement of its application to the Part III–Part IV relationship of continuing scholarly relevance. Third, a structured empirical-hypothesis approach to what is traditionally a purely doctrinal subject offers a methodologically useful template for future interdisciplinary constitutional research combining legal doctrine with social science research design.

1.5. The Statement of the Problem

The central problem addressed by this study may be stated as follows: notwithstanding the explicit textual non-justiciability of the Directive Principles of State Policy under Article 37 and the express primacy historically accorded to Fundamental Rights under Article 13, the constitutional history of India reveals recurring legislative and executive attempts to subordinate Part III rights to Part IV objectives, generating sustained constitutional conflict; the problem this study investigates is the extent to which this conflict has been, and can be, resolved through judicial doctrine so as to preserve both the justiciable guarantees of Part III and the welfare objectives of Part IV without either part being rendered illusory.

1.6. The Objectives of the Study

O1: To identify the major areas of conflict between Fundamental Rights and Directive Principles of State Policy.

O2: To study how Fundamental Rights and Directive Principles of State Policy co-exist to achieve the goals of justice and the welfare state.

O3: To examine the role of the judiciary, especially the Supreme Court of India, in resolving conflicts between Fundamental Rights and Directive Principles of State Policy.

1.7. The Hypotheses of the Study

H01: There is no significant constitutional conflict between Fundamental Rights and Directive Principles of State Policy in India.

H02: There is no significant harmonious relationship between Fundamental Rights and Directive Principles of State Policy in promoting justice and the concept of a welfare state.

H03: There is no significant judicial contribution by the Supreme Court of India in balancing and resolving conflicts between Fundamental Rights and Directive Principles of State Policy.

1.8. Delimitations of the Study

The study is confined to the constitutional jurisprudence of India and does not undertake a comparative analysis of analogous directive-principle provisions in other jurisdictions such as Ireland or Nigeria, beyond brief conceptual reference.

The study is doctrinal and analytical in nature; it does not include primary empirical data such as surveys, interviews, or field-based data collection, and the "analysis" presented in Section 3 is a structured doctrinal-content analysis rather than a statistical inferential analysis.

The study focuses primarily on Supreme Court jurisprudence and does not undertake an exhaustive survey of High Court decisions, except where directly relevant to illustrating a Supreme Court principle.

The study examines constitutional amendments and case law up to and including developments reported up to mid-2026 and does not purport to account for subsequent developments.

The study does not address the Directive Principles' interaction with Fundamental Duties under Article 51A, except incidentally, as that relationship falls outside the scope of the stated objectives.

II. METHODOLOGY OF THE STUDY

This study adopts a doctrinal, analytical, and historical research methodology, which is the methodology most appropriate to legal research concerned with the interpretation of constitutional text, statutory amendments, and judicial precedent (Jain, 2018). The doctrinal method involves the systematic collection, classification, and critical analysis of primary legal sources — namely, the text of the Constitution of India, 1950, the Constitution (Amendment) Acts, and the judgments of the Supreme Court of India — read together with secondary sources comprising peer-reviewed academic literature, institutional commentary, and law commission reports.

Data Sources: Primary data for this study consist of (a) the constitutional text of Part III (Articles 12–35) and Part IV (Articles 36–51) of the Constitution of India; (b) the text of relevant constitutional amendments, namely the First Amendment Act, 1951; the Fourth Amendment Act, 1955; the Seventeenth Amendment Act, 1964; the Twenty-Fourth Amendment Act, 1971; the Twenty-Fifth Amendment Act, 1971; the Forty-Second Amendment Act, 1976; and the Forty-Fourth Amendment Act, 1978; and (c) the full text and ratio decidendi of landmark Supreme Court judgments including *State of Madras v. Champakam Dorairajan* (1951), *Shankari Prasad v. Union of India* (1951), *Sajjan Singh v. State of Rajasthan* (1965), *I.C. Golak Nath v. State of Punjab* (1967), *Kesavananda Bharati v. State of Kerala* (1973), *Minerva Mills Ltd. v. Union of India* (1980), *Maneka Gandhi v. Union of India* (1978), and *Waman Rao v. Union of India* (1981), among others discussed in Section 3.

Secondary data are drawn from peer-reviewed journal articles, scholarly monographs, and reputable legal databases (Indian Kanoon, SCC Online equivalents, and academic publishers) published predominantly between 2018 and 2026, with particular emphasis on five sources published between 2020 and 2026 as required by the review of literature in Section 1.2.

III. ANALYSIS AND INTERPRETATION OF HYPOTHESES

3.1. Testing of H01: Constitutional Conflict between Fundamental Rights and DPSP

Table 1 below maps the principal areas of textual and structural conflict between Part III and Part IV of the Constitution, the specific Articles involved, and the constitutional or legislative event through which the conflict materialised.

Table 1. Major Areas of Conflict between Fundamental Rights and Directive Principles of State Policy

Area of Conflict	FR Article(s)	DPSP Article(s)	Triggering Event	Source
Right to Equality vs. reservation policy	Art. 14, 15, 16	Art. 46	Communal G.O. struck down in <i>State of Madras v. Champakam Dorairajan</i> (1951); led to 1st Amendment inserting Art. 15(4)	<i>Champakam Dorairajan</i> (1951); Constitution (1st Amendment) Act, 1951
Right to Property vs. land/agrarian reform	Art. 19(1)(f), 31 (since repealed)	Art. 39(b), 39(c)	Zamindari abolition laws challenged; Ninth Schedule inserted by 1st Amendment	Constitution (1st Amendment) Act, 1951; Constitution (4th Amendment) Act, 1955
Amenability of FRs to amendment	Art. 13, Part III generally	Art. 368 (amending power)	<i>Golak Nath v. State of Punjab</i> (1967) held Part III unamendable; reversed by 24th Amendment	<i>Golak Nath</i> (1967); Constitution (24th Amendment) Act, 1971

Area of Conflict	FR Article(s)	DPSP Article(s)	Triggering Event	Source
Primacy of laws implementing Art. 39(b)/(c) over Arts. 14 & 19	Art. 14, 19	Art. 39(b), 39(c)	Art. 31C inserted by 25th Amendment, 1971; partially upheld in Kesavananda Bharati (1973)	Constitution (25th Amendment) Act, 1971; Kesavananda Bharati (1973)
Blanket primacy of ALL DPSPs over Arts. 14 & 19	Art. 14, 19	Part IV (all Articles)	Art. 31C widened by Sec. 4, 42nd Amendment, 1976; struck down as unconstitutional	Constitution (42nd Amendment) Act, 1976; Minerva Mills (1980)
Ouster of judicial review over constitutional amendments	Judicial review (basic structure)	Art. 368(4)-(5) (inserted)	Sec. 55, 42nd Amendment, sought to immunise all amendments from review; struck down	Constitution (42nd Amendment) Act, 1976; Minerva Mills (1980)
Personal liberty vs. preventive detention/welfare regulation	Art. 21	Art. 38, 39	Narrow Gopalan interpretation of Art. 21 displaced by expansive Maneka Gandhi reading	A.K. Gopalan v. State of Madras (1950); Maneka Gandhi v. Union of India (1978)

Interpretation of Table 1: The data tabulated above demonstrate that constitutional conflict between Fundamental Rights and Directive Principles is not a single, isolated event but a recurring structural phenomenon spanning seven distinct episodes between 1951 and 1980, each resolved through either constitutional amendment, judicial pronouncement, or both. The earliest conflict, arising in Champakam Dorairajan (1951), concerned the tension between the Directive Principle on the promotion of educational and economic interests of weaker sections under Article 46 and the Fundamental Right to equality under Articles 14, 15, and 16; the Madras High Court's communal Government Order reserving seats in medical and engineering colleges was struck down because, at the time, no enabling constitutional provision permitted such reservation, and the Supreme Court affirmed that Directive Principles "have to conform to and run as subsidiary to the Chapter on Fundamental Rights" (Champakam Dorairajan, 1951). This triggered the first constitutional amendment in India's history, the Constitution (First Amendment) Act, 1951, which inserted Article 15(4), enabling the State to make special provision for socially and educationally backward classes.

A second and more structurally significant conflict concerned the amenability of Fundamental Rights themselves to constitutional amendment for the purpose of implementing Directive Principles, particularly Article 39(b) and (c) concerning equitable distribution of material resources. This conflict reached its apex in I.C. Golak Nath v. State of Punjab (1967), in which a narrow 6:5 majority of the Supreme Court held that Parliament's power under Article 368 could not be used to abridge or take away any Fundamental Right, effectively freezing the State's capacity to use constitutional amendment as a tool of DPSP implementation (Golak Nath v. State of Punjab, 1967). Parliament's response — the Constitution (Twenty-Fourth Amendment) Act, 1971 — amended Articles 13 and 368 to restore Parliament's express power to amend any part of the Constitution, including Part III, demonstrating the legislative branch's direct counter-response to judicially imposed limits arising from the Part III–Part IV tension.

The most acute and constitutionally consequential conflict, however, arose from the insertion of Article 31C by the Constitution (Twenty-Fifth Amendment) Act, 1971, and its subsequent expansion by Section 4 of the Constitution (Forty-Second Amendment) Act, 1976. The original Article 31C provided that no law giving effect to the policy of the State towards securing the principles in Article 39(b) and (c) would be void merely on the ground of inconsistency with Articles 14 or 19; this was upheld in Kesavananda Bharati v. State of Kerala (1973), although the Court struck down the second part of Article 31C, which barred judicial review of such laws, on the ground that judicial review forms part

of the basic structure of the Constitution (*Kesavananda Bharati v. State of Kerala*, 1973). Parliament's subsequent attempt, through Section 4 of the 42nd Amendment, to extend this immunity to laws implementing any Directive Principle whatsoever — not merely Article 39(b) and (c) — was struck down as unconstitutional in *Minerva Mills Ltd. v. Union of India* (1980), the Court holding that to give Part IV unconditional primacy over Part III would destroy the basic structure of the Constitution by upsetting "the harmony and balance between fundamental rights and directive principles" (*Minerva Mills Ltd. v. Union of India*, 1980).

On the strength of this cumulative doctrinal and historical evidence — seven distinct, well-documented episodes of conflict, four major constitutional amendments specifically targeting the Part III–Part IV relationship, and at least five landmark Supreme Court judgments directly adjudicating that conflict — the null hypothesis H01, which posits that there is no significant constitutional conflict between Fundamental Rights and Directive Principles of State Policy in India, is rejected. The evidence overwhelmingly demonstrates the existence of significant, recurring, and constitutionally consequential conflict between the two parts.

3.2. Testing of H02: Harmonious Relationship in Promoting Justice and the Welfare State

Table 2 below catalogues the principal doctrinal and legislative mechanisms through which Fundamental Rights and Directive Principles have been harmonised in pursuit of justice and welfare-state objectives, together with their judicial or legislative source.

Table 2. Mechanisms of Harmonious Co-existence between Fundamental Rights and DPSP

Mechanism of Harmony	Constitutional Basis	Illustrative Case / Instrument	Welfare Outcome Achieved	Source
Doctrine of Harmonious Construction	Arts. 14, 19, 39	In re Kerala Education Bill (1957)	Reconciles statutes serving DPSP goals with FR guarantees wherever reasonably possible	Re Kerala Education Bill (1957)
Reading DPSP content into Art. 21 (right to life)	Art. 21 with Arts. 39, 41, 47	<i>Maneka Gandhi v. Union of India</i> (1978); subsequent right-to-livelihood/health jurisprudence	Expanded 'life' to include dignity, livelihood, health, and education	<i>Maneka Gandhi</i> (1978)
Basic Structure protection of FR–DPSP balance itself	Arts. 14, 19, 368	<i>Minerva Mills Ltd. v. Union of India</i> (1980)	Prevents total subordination of either Part, preserving both rights and welfare goals	<i>Minerva Mills</i> (1980)
Article 31C (original, narrow form)	Art. 31C, 39(b)-(c)	<i>Kesavananda Bharati v. State of Kerala</i> (1973)	Permits targeted economic-redistribution laws without wholesale rights abrogation	<i>Kesavananda Bharati</i> (1973)
Reservation and affirmative action provisions	Art. 15(4), 15(5), 16(4)	Constitution (1st Amendment) Act, 1951; subsequent amendments	Operationalises Art. 46 DPSP through FR-compatible exceptions	Constitution (1st Amendment) Act, 1951

Mechanism of Harmony	Constitutional Basis	Illustrative Case / Instrument	Welfare Outcome Achieved	Source
Statutory welfare legislation implementing DPSP without FR amendment	Arts. 39, 41, 45, 47	National Food Security Act, 2013; MGNREGA, 2005; RTE enforcement	Converts DPSP aspirations into enforceable statutory entitlements	Sharma & Verma (2025)

Interpretation of Table 2: The doctrinal evidence assembled in Table 2 demonstrates that the Indian judiciary has developed at least six distinct, mutually reinforcing mechanisms through which Fundamental Rights and Directive Principles have been reconciled rather than treated as zero-sum competitors. The earliest of these, the doctrine of harmonious construction articulated in *In re Kerala Education Bill* (1957), instructs courts that where two interpretations of a statute are possible, one rendering it void for inconsistency with Fundamental Rights and another upholding it as a valid implementation of a Directive Principle, courts should, as far as possible, adopt the interpretation that reconciles both Parts rather than the interpretation that produces invalidity. This doctrine remains the foundational interpretive technique underlying all subsequent harmonisation efforts.

A second and arguably more transformative mechanism is the judicial technique of reading Directive Principles into the substantive content of Fundamental Rights, particularly Article 21. In *Maneka Gandhi v. Union of India* (1978), the Supreme Court held that the "procedure established by law" under Article 21 must be fair, just, and reasonable, and that the right to life and personal liberty encompasses the right to live with human dignity, not mere animal existence (*Maneka Gandhi v. Union of India*, 1978). This interpretive expansion created the analytical space within which subsequent jurisprudence could read Directive Principles concerning health (Article 47), education (Article 41 and the subsequently inserted Article 21A), and livelihood (Article 39) into the substantive guarantee of Article 21, effectively operationalising several DPSP goals as judicially enforceable rights without requiring a formal constitutional amendment (Chandrachud, 2023; Bhatia, 2021).

A third mechanism, the Basic Structure Doctrine itself, performs a protective rather than expansive function: by holding in *Minerva Mills Ltd. v. Union of India* (1980) that the harmony and balance between Part III and Part IV is itself a basic feature of the Constitution, the Supreme Court ensured that future legislative or executive attempts to deploy Directive Principles as a justification for wholesale abrogation of Fundamental Rights would themselves be unconstitutional, thereby institutionally entrenching the harmonisation principle beyond the reach of ordinary parliamentary majorities (*Minerva Mills*, 1980; Krishnaswamy & Khaitan, 2022).

Finally, the contemporary legislative trend identified by Sharma and Verma (2025) — the enactment of detailed welfare statutes such as the National Food Security Act, 2013, and the Mahatma Gandhi National Rural Employment Guarantee Act, 2005 — illustrates that Parliament has, in the post-*Minerva Mills* era, predominantly chosen the route of ordinary welfare legislation rather than constitutional amendment to implement Directive Principles, a pattern consistent with a stabilised, harmonised constitutional order in which DPSP goals are pursued without disturbing the Fundamental Rights framework.

On the strength of this evidence, the null hypothesis H02, which posits that there is no significant harmonious relationship between Fundamental Rights and Directive Principles of State Policy in promoting justice and the concept of a welfare state, is rejected. The cumulative doctrinal record demonstrates a significant, sustained, and institutionally entrenched harmonious relationship operating through multiple distinct constitutional and legislative mechanisms.

3.3. Testing of H03: Judicial Contribution to Balancing Fundamental Rights and DPSP

Table 3 below summarises the principal Supreme Court decisions directly addressing the Fundamental Rights–DPSP relationship, their core holdings, and their doctrinal contribution to constitutional balance.

Table 3. Landmark Supreme Court Judgments on the Fundamental Rights–DPSP Relationship

Case (Year)	Core Holding	Doctrinal Contribution	Source
State of Madras v. Champakam Dorairajan (1951)	DPSP must conform to and run subsidiary to Fundamental Rights; communal G.O. for college reservation struck down	Established initial textual primacy of Part III over Part IV	Champakam Dorairajan (1951)
Shankari Prasad v. Union of India (1951)	Constitutional amendments under Art. 368 are not 'law' under Art. 13(2) and are not subject to FR challenge	Affirmed wide, largely unconstrained amending power	Shankari Prasad v. Union of India (1951)
I.C. Golak Nath v. State of Punjab (1967)	Parliament cannot amend Part III; constitutional amendments are 'law' under Art. 13(3)(a)	Temporarily froze FR amendability; catalysed 24th Amendment	Golak Nath v. State of Punjab (1967)
Kesavananda Bharati v. State of Kerala (1973)	Parliament can amend any part of Constitution including FRs, but cannot destroy the 'basic structure'	Introduced Basic Structure Doctrine; upheld Art. 31C (1st part) but struck down ouster of judicial review	Kesavananda Bharati v. State of Kerala (1973)
Maneka Gandhi v. Union of India (1978)	Art. 21 procedure must be fair, just and reasonable; Arts. 14, 19, 21 read together ('golden triangle')	Enabled reading of DPSP welfare content into Art. 21	Maneka Gandhi v. Union of India (1978)
Minerva Mills Ltd. v. Union of India (1980)	Secs. 4 & 55 of 42nd Amendment unconstitutional; harmony of Part III & IV is part of basic structure	Definitively rejected DPSP primacy over FRs; entrenched harmonious balance	Minerva Mills Ltd. v. Union of India (1980)
Waman Rao v. Union of India (1981)	Applied 'basic structure' test prospectively to laws placed in Ninth Schedule after 24 April 1973	Limited retroactive disruption while preserving basic structure review	Waman Rao v. Union of India (1981)

Interpretation of Table 3: The seven landmark decisions tabulated above, spanning nearly three decades from 1951 to 1981, reveal a clear judicial trajectory: from an early, relatively rigid assertion of Fundamental Rights primacy in Champakam Dorairajan (1951), through a period of judicial restraint regarding the amending power in Shankari Prasad (1951), to an assertive but ultimately unsustainable judicial entrenchment of absolute Fundamental Rights immunity in Golak Nath (1967), and finally to the mature, balanced doctrinal settlement achieved in Kesavananda Bharati (1973) and consolidated in Minerva Mills (1980). This trajectory demonstrates a sophisticated and evolving judicial contribution rather than a single static pronouncement.

The contribution of Kesavananda Bharati v. State of Kerala (1973) deserves particular emphasis, as it represents the doctrinal hinge upon which the entire subsequent relationship between Part III and Part IV pivots. By holding that Parliament's amending power, while wide, is subject to the implied limitation that it cannot destroy the "basic structure" of the Constitution, the thirteen-judge bench (the largest in Indian constitutional history) created an interpretive framework flexible enough to accommodate legitimate DPSP-driven amendments while rigid enough to prevent the wholesale subordination of Part III (Kesavananda Bharati v. State of Kerala, 1973). The Court's simultaneous striking down of the judicial-review-ouster clause within Article 31C demonstrated that the judiciary regarded its own supervisory role over the Part III–Part IV boundary as itself a non-negotiable constitutional safeguard.

Minerva Mills Ltd. v. Union of India (1980) represents the doctrinal culmination of this judicial contribution. Chief Justice Y.V. Chandrachud, writing for the majority, held that "three Articles of our Constitution, and only three, stand between the heaven of freedom... and the abyss of unrestrained power," namely Articles 14, 19, and 21, and that Parliament's attempt through the 42nd Amendment to give blanket primacy to all Directive Principles over these Articles would, if permitted, "defeat the very object" of the Constitution (Minerva Mills Ltd. v. Union of India, 1980). The Court's characterisation of Fundamental Rights and Directive Principles as "two wheels of the chariot, one no less important than the other," succinctly captures the judicially constructed equilibrium that continues to govern Indian constitutional law (Minerva Mills Ltd. v. Union of India, 1980).

Given the depth, consistency, and doctrinal sophistication of this judicial record — encompassing the creation of the Basic Structure Doctrine, the rejection of absolute parliamentary supremacy, the rejection of absolute judicial entrenchment of Fundamental Rights against all amendment, and the eventual institutionalisation of a balanced reading of Part III and Part IV — the null hypothesis H03, which posits that there is no significant judicial contribution by the Supreme Court of India in balancing and resolving conflicts between Fundamental Rights and Directive Principles of State Policy, is rejected. The evidence demonstrates a substantial, sustained, and doctrinally foundational judicial contribution.

IV. FINDINGS

The study finds that significant constitutional conflict has historically existed between Fundamental Rights and Directive Principles of State Policy, manifesting most acutely in the areas of equality and reservation policy (Champakam Dorairajan, 1951), the amenability of Fundamental Rights to constitutional amendment (Golak Nath v. State of Punjab, 1967), and the attempted blanket subordination of Articles 14 and 19 to all Directive Principles under the 42nd Amendment (Minerva Mills Ltd. v. Union of India, 1980). Accordingly, the null hypothesis H01 is rejected; the alternative hypothesis — that significant constitutional conflict does exist between the two Parts — is accepted.

The study finds that, notwithstanding this historical conflict, Fundamental Rights and Directive Principles have been substantially harmonised through the doctrine of harmonious construction (In re Kerala Education Bill, 1957), the judicial technique of reading DPSP content into Article 21 (Maneka Gandhi v. Union of India, 1978), the entrenchment of Part III–Part IV balance as part of the basic structure (Minerva Mills Ltd. v. Union of India, 1980), and a sustained legislative preference for statutory welfare implementation over constitutional amendment in the contemporary period (Sharma & Verma, 2025). Accordingly, the null hypothesis H02 is rejected; the alternative hypothesis — that a significant harmonious relationship exists — is accepted.

The study finds that the Supreme Court of India has made a substantial and doctrinally foundational contribution to resolving Part III–Part IV conflict, principally through the creation and consistent application of the Basic Structure Doctrine first articulated in Kesavananda Bharati v. State of Kerala (1973) and definitively applied to protect Fundamental Rights from blanket DPSP subordination in Minerva Mills Ltd. v. Union of India (1980). Accordingly, the null hypothesis H03 is rejected; the alternative hypothesis — that significant judicial contribution exists — is accepted.

The study additionally finds that the present constitutional position, settled since Minerva Mills (1980) and undisturbed in subsequent jurisprudence such as Waman Rao v. Union of India (1981), is that only laws genuinely and directly implementing Articles 39(b) and 39(c) may claim limited insulation from challenge under Articles 14 and 19 pursuant to the surviving first part of Article 31C, while no Directive Principle, individually or collectively, may be invoked to override the basic structure of the Constitution, of which the harmony between Fundamental Rights and Directive Principles is itself an inseparable element.

The study finds that the contemporary trend in Indian constitutional practice, as evidenced by the enactment of comprehensive welfare statutes such as the National Food Security Act, 2013, and the Mahatma Gandhi National Rural Employment Guarantee Act, 2005, reflects a maturing constitutional order in which Directive Principles are increasingly implemented through ordinary legislation operating within, rather than against, the framework of Fundamental Rights, reducing the frequency of direct Part III–Part IV constitutional confrontation in recent decades.

V. CONCLUSION

This study set out to examine the conflict, co-existence, and constitutional balance between Fundamental Rights and Directive Principles of State Policy under the Constitution of India. Tracing the relationship from its conceptual origins in the Constituent Assembly debates through seven decades of constitutional amendment and judicial pronouncement, the study has demonstrated that the relationship between Part III and Part IV cannot be reduced to a simple hierarchy in either direction. Early jurisprudence, exemplified by *State of Madras v. Champakam Dorairajan* (1951), asserted a clear primacy of Fundamental Rights; subsequent legislative responses through the First, Fourth, Seventeenth, Twenty-Fourth, Twenty-Fifth, and Forty-Second Amendments sought, with varying success, to expand the State's capacity to implement Directive Principles even where this required limiting Fundamental Rights; and the Supreme Court, through the landmark decisions in *I.C. Golak Nath v. State of Punjab* (1967), *Kesavananda Bharati v. State of Kerala* (1973), and *Minerva Mills Ltd. v. Union of India* (1980), progressively developed the Basic Structure Doctrine as the definitive constitutional mechanism for preventing either Part from being rendered wholly subordinate to the other.

All three null hypotheses formulated for this study — concerning the absence of significant conflict, the absence of significant harmony, and the absence of significant judicial contribution — were tested against the cumulative doctrinal record and rejected. The study concludes that significant constitutional conflict has indeed existed between Fundamental Rights and Directive Principles, that a significant and increasingly stable harmonious relationship between the two has nonetheless been constructed and judicially entrenched, and that the Supreme Court of India has made an indispensable contribution to achieving this balance, most notably through the Basic Structure Doctrine and its consistent application in *Minerva Mills Ltd. v. Union of India* (1980).

The enduring judicial characterisation of Fundamental Rights and Directive Principles as the "two wheels of the chariot" of the Indian Constitution remains, on the evidence reviewed in this study, an accurate description of the present constitutional position: neither Part is dispensable, neither may be permitted unconditional primacy over the other, and the legitimacy of any legislative or executive measure invoking a Directive Principle to limit a Fundamental Right must continue to be tested against the touchstone of the basic structure, ensuring that India's constitutional commitment to both individual liberty and social and economic justice is preserved as a unified, rather than a contradictory, constitutional project (*Minerva Mills Ltd. v. Union of India*, 1980; Krishnaswamy & Khaitan, 2022).

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