



MINERVA MILLS V. UNION OF INDIA (1980)

Constitutional Interpretation & Basic Structure

PRELIMS SNAPSHOT

- 📅 Year: 1980
- ⚖️ Case: Minerva Mills Ltd. v. Union of India
- 👤 Bench Strength: 5 Judges
- 📖 Key Articles Involved: Article 368, Article 14, Article 19, Article 31C
- 🧠 Doctrine Evolved: Balance between Fundamental Rights and Directive Principles is part of the Basic Structure
- 💬 Famous Line: "Harmonious relationship between Parts III and IV is essential to our constitutional philosophy."

CONTEXT & BACKGROUND

Minerva Mills, a private textile mill in Karnataka, was nationalized under the Sick Textile Undertakings (Nationalisation) Act, 1974. The company challenged this action and, during the proceedings, also contested the validity of the 42nd Constitutional Amendment (1976)



passed during the Emergency—which had dramatically expanded Parliament’s power.

The Amendment modified Article 31C, stating that any law made to implement Directive Principles (Part IV) could not be struck down even if it violated Fundamental Rights under Article 14 or Article 19. This raised deep concerns over whether Directive Principles could override Fundamental Rights completely.

CONSTITUTIONAL ISSUES RAISED

- Can Parliament amend the Constitution in a way that destroys Fundamental Rights?
- Does giving supremacy to Directive Principles over Fundamental Rights violate the Basic Structure?
- Is there a constitutional limit to Parliament’s amending power?

VERDICT & RATIO DECIDENDI

The Supreme Court unanimously struck down Sections 4 and 55 of the 42nd Amendment as unconstitutional. It held that:

- Limited amending power is part of the Basic Structure



- The harmony and balance between Fundamental Rights (Part III) and Directive Principles (Part IV) is essential and cannot be disturbed
- Parliament cannot amend the Constitution in a way that eliminates judicial review or weakens core rights

Justice Chandrachud stated: “The Constitution is founded on the bedrock of the balance between Parts III and IV. To destroy the guarantees in Part III in order to achieve the goals of Part IV is plainly to subvert the Constitution.”

DOCTRINE / PRINCIPLE EVOLVED

- Balance between Fundamental Rights and Directive Principles is part of the Basic Structure
- Judicial review and limited amending power reaffirmed
- The 42nd Amendment’s overreach was constitutionally invalidated



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IMPACT & LEGACY

- The judgment restored constitutional equilibrium between rights and duties
- Prevented Parliament from using Directive Principles to completely override Fundamental Rights
- Reinforced judicial review as a critical tool to uphold constitutional supremacy
- Became a foundational case for interpreting social justice and rights-based governance in tandem



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RELEVANCE FOR UPSC

- GS Paper 2:
 - Amendment of the Constitution
 - Fundamental Rights vs. Directive Principles
 - Role of Judiciary in constitutional interpretation
- GS Paper 4 (Ethics):
 - Balancing rights and responsibilities
 - Constitutional ethics
- Essay Paper:
 - Themes on Justice, Constitutional Balance, Role of Institutions
- UPSC Interview:
 - Useful in explaining judicial restraint, constitutional harmony, and Emergency-era legal legacy

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