










# **JARNAIL SINGH V. LACHHMI NARAIN GUPTA (2018)**

*Constitutional Interpretation & Basic Structure*

## **PRELIMS SNAPSHOT**

-  1. Prelims Snapshot (Fact Box)
-  Year: 2018
-  Case: Jarnail Singh v. Lachhmi Narain Gupta
-  Bench Strength: 5 Judges (Constitution Bench)
-  Key Articles Involved: Article 16(4), Article 16(4A), Article 335
-  Doctrine Evolved: Relaxation of M. Nagaraj requirements; Creamy layer applicable to SCs/STs in promotions
-  Famous Line: "The concept of creamy layer is a principle of equality, not a tool of exclusion."

## **CONTEXT & BACKGROUND**

The M. Nagaraj (2006) judgment had upheld reservation in promotions for SCs/STs but required the government to collect quantifiable data to prove backwardness, inadequate representation, and maintenance of administrative efficiency.



It also stated that the creamy layer concept would apply to OBCs but not to SCs/STs.

This led to implementation hurdles. In Jarnail Singh, the constitutional validity of this interpretation was challenged, and the Court revisited M. Nagaraj to address whether SCs/STs too should be subject to the creamy layer exclusion.

## **CONSTITUTIONAL ISSUES RAISED**

- Does the requirement to prove backwardness for SCs/STs violate their rights under Article 16(4A)?
- Can the creamy layer concept be applied to SCs/STs in promotions?
- Is it necessary to collect quantifiable data on backwardness or just on inadequate representation?

## **VERDICT & RATIO DECIDENDI**

The Supreme Court partially overruled M. Nagaraj and held that:

- It is not necessary to collect data to prove backwardness of SCs/STs for promotions, as their backwardness is constitutionally recognised



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## MAJOR SUPREME COURT JUDGEMENTS

- The creamy layer principle applies to SCs/STs in promotions to prevent the benefits from going to the advanced among them
- This ensures a balance between affirmative action and equality

The judgment emphasised substantive equality, while preserving administrative efficiency.

### **DOCTRINE / PRINCIPLE EVOLVED**

- Backwardness test waived for SCs/STs, but other Nagaraj conditions remain
- Creamy layer exclusion applies to SCs/STs for promotions under Article 16(4A)
- Reinforced that equality is a part of the Basic Structure, and affirmative action must be justified and data-driven





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# MAJOR SUPREME COURT JUDGEMENTS

## IMPACT & LEGACY

- Clarified the constitutional status of promotion-based reservations for SCs/STs
- Strengthened the framework for empirical justification in implementing quotas
- Became a key reference point in ongoing cases involving service-based reservations, including for Economically Weaker Sections (EWS)
- Opened wider discussions on the applicability of creamy layer across all reserved categories



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# MAJOR SUPREME COURT JUDGEMENTS

## RELEVANCE FOR UPSC

- GS Paper 2:
  - Reservation policy and legal evolution
  - Service rules and constitutional mandates
  - Balancing social justice with meritocracy
- GS Paper 4 (Ethics):
  - Ethical implementation of affirmative action
  - Inclusivity vs. elite capture in welfare
- Essay Paper:
  - Use in topics like Evolving Nature of Equality, Reservation and Social Justice, Data-Driven Governance
- UPSC Interview:
- Useful in questions on caste-based reforms, promotion policies, or how to refine reservation models

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