









S. R. BOMMAI V. UNION OF INDIA (1994)

Constitutional Interpretation & Basic Structure

PRELIMS SNAPSHOT

-  Year: 1994
-  Case: S. R. Bommai v. Union of India
-  Bench Strength: 9 Judges
-  Key Articles Involved: Article 356, Article 365, Article 74
-  Doctrine Evolved: Federalism and Secularism as part of the Basic Structure; Judicial Review of President's Rule
-  Famous Line: "President's satisfaction is not beyond judicial scrutiny."

CONTEXT & BACKGROUND

This case emerged after the dismissal of several state governments by the Centre invoking Article 356, often on political grounds. One such case was in Karnataka, where the S. R. Bommai-led Janata Dal government was dismissed despite having majority support.



The arbitrary use of President's Rule by the central government raised serious constitutional concerns over the misuse of Article 356, which allows the Centre to dismiss a state government in case of constitutional breakdown. The case was referred to a 9-judge Constitutional Bench to examine the limits of this power.

CONSTITUTIONAL ISSUES RAISED

- Is the President's decision under Article 356 subject to judicial review?
- Can the Centre dissolve a state legislature without a floor test?
- Are federalism and secularism protected under the Basic Structure Doctrine?

VERDICT & RATIO DECIDENDI

The Supreme Court unanimously laid down strict guidelines for the use of Article 356 and held that:

- President's satisfaction is not absolute; it is subject to judicial review
- A floor test in the assembly is the only legitimate way to test majority



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- The use of Article 356 must be exceptional, not routine or politically motivated

The court reinstated the Bommai government, emphasizing the rule of law over executive discretion.

DOCTRINE / PRINCIPLE EVOLVED

- Federalism and secularism are essential features of the Constitution and part of the Basic Structure
- Judicial review of President's Rule is permitted
- Majority must be tested on the floor of the House, not decided by the Governor or Centre



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IMPACT & LEGACY

- Landmark judgment in strengthening federalism and democratic accountability
- Curbed politically motivated dismissals of state governments
- Used as a precedent in later cases involving misuse of Article 356
- Reaffirmed that secularism is a constitutional value, not merely a political philosophy
- Shifted Indian federalism from central dominance to cooperative balance



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RELEVANCE FOR UPSC

- GS Paper 2:
 - Centre–State Relations
 - Emergency Provisions
 - Role of Governor and President
- GS Paper 4 (Ethics):
 - Abuse of power
 - Ethical governance and federal responsibility
- Essay Paper:
 - Themes like “Federalism in India”, “Balance of Power”, “Strengthening Democracy”
- UPSC Interview:
 - Relevant in discussions on recent instances of Article 356, state autonomy, and misuse of executive power

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