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TAMIL NADU

VETHA PHILOS*

Introduction

The Tamil Nadu Legislative Assembly (Hereinafter referred to as TNLA, or ‘assembly’) is in its 16th term and was constituted in 2021.¹ Regional parties play a key role in the political landscape of Tamil Nadu, with the DMK² and the AIADMK³ controlling most of the assembly seats. The DMK-led Secular Progressive Alliance⁴ won 159 out of 234 constituent seats and formed the government. They replaced the AIADMK-led government, which had controlled the assembly for the previous two terms continuously. The state legislature is unicameral, although it was bicameral till 1986.

Methodology

For this survey of the assembly’s work in 2023, the legislations, ordinances, and resolutions were accessed through its gazette publications. The PRS Review⁵ was also helpful in tracking the work of TNLA.

The survey firstly presents the legislative work of the TNLA in 2023 in quantitative terms, followed by a comprehensive analysis of all the significant enactments. A few enactments that only made marginal changes⁶ have not been included.

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¹ It was known as the Madras Legislative Assembly for its first four terms.

² The Dravida Munnetra Kazhagam (The Dravidian Progressive Federation).

³ The All India Anna Dravida Munnetra Kazhagam (The All India Anna Progressive Federation).

⁴ The Alliance includes the Indian National Congress, Communist Party of India, Communist Party of India (Marxist), and the Viduthalai Chiruthaigal Katchi.

⁵ Manas Gubbi, Niranjana S Menon & Simranjyot Kaur, “Annual Review of State Laws 2023”, available at https://prsindia.org/files/legislature/annual-review-of-state-laws/Annual_Review-State_Laws_2023.pdf. (last visited on June 22, 2024).

⁶ For instance, the Chennai City Police (Amendment) Act, 2023, merely removed the word ‘gymnasium’ which appeared in two places in the Chennai City Police Act, 1888.

From amongst the resolutions adopted by the assembly, only the significant ones, which impacted the legislative functions of the assembly, have been discussed. The resolutions included in this study were selected on the basis of media reports and those that featured in the YouTube channel of the assembly. The channel was started in 2023, with only selective segments of the sessions being uploaded. The inclusion of the resolutions in this channel indicates their significance as the TNLA itself as it has taken the initiative to disseminate them to a wider audience.

Quantitative Analysis

The fifth session lasted for the whole of 2023. The summon to convene the Assembly was issued on the 26th of December 2022, and it assembled for its first meeting on the 9th of January 2023. The Assembly held four meetings in the survey year, and its last meeting was held between the 16th to the 18th of November. The Assembly sat for 29 days in 2023, with the budget meeting being held between the 20th of March and the 21st of April, accounting for 21 days. The sittings in the budget session accounted for 72% of all meetings. The national average in 2023 across all state legislatures was 62%.⁷

In the time that it met the Assembly took up legislative business for only four days in 2023, in which the TNLA considered and passed 30 Bills. Most of these bills have been passed without discussion. Out of the 30 Bills, 24 received the assent of the Governor, and five others have not received gubernatorial approval⁸ and one has been withdrawn by the TNLA.⁹ The state did not promulgate any ordinances in 2023.

The subject-wise categorisation of the Bills considered by the TNLA in 2023 is as follows.

Category	Number
Fiscal and taxation laws	10
Labour legislations	4
Agriculture and agricultural market	3
Universities	3
Government servants (salary, recruitment, etc)	3
Repealing of laws	3
Land acquisition and urban planning	2
Legislation on prohibition (hookah and gambling)	2

⁷ Gubbi, Menon & Kaur, *supra* note 5.

⁸ *Id.*

⁹ The Factories (Tamil Nadu Amendment) Act, 2023 was not pursued further by the TNLA and for detailed elaboration see section of Labour Legislations in this Chapter.

Qualitative Analysis

The qualitative analysis of the legislation follows the categorisation mentioned in the table prior.

Fiscal and Taxation Laws

Three amendments were made to the Tamil Nadu Goods and Services Act,¹⁰ all of which were necessitated due to recommendations made by the GST Council, as the State GST Act and Central GST Acts are expected to be mirror images of each other. With the implementation of the Goods and Services Act, several state tax legislations were previously repealed.¹¹

Notwithstanding the repeal, there were several cases where the tax assessment under the repealed legislation was pending before the courts. To facilitate the early settlement of arrears of taxes in these cases, the Tamil Nadu Taxes (Settlement of Arrears) Act, 2023 was enacted. Depending on the quantum of contested tax demand the state allowed for either a complete waiver or a settlement through partial payment.¹²

An amendment was also made to the Tamil Nadu Fiscal Responsibility Act, 2003 to postpone the dates on which the fiscal targets are to be met by the Government. The Act, before amendment, aimed to eliminate the revenue deficit by 2023-2024 and the deficit to the State's GDP by 31 March 2024. The amendment postponed the target dates by a year.¹³

Labour Legislations

In 2023, the assembly made two amendments to the Tamil Nadu Shops and Establishments Act of 1947. The first amendment mandated the provision of drinking water, restrooms and other facilities to workers.¹⁴ The Second Amendment changed the manner in which the registration and cancellation of certificates are to be processed under the Act.¹⁵

¹⁰ Tamil Nadu Goods and Services Tax (Amendment) Act, 2023, Tamil Nadu Goods and Services Tax (Amendment) Amendment Act, 2023 and Tamil Nadu Goods and Services Tax (Second Amendment) Act, 2023.

¹¹ For the list of statutes that have been repealed See Tamil Nadu Taxes (Settlement of Arrears) Act, 2023, §2(i).

¹² For the slabs and method of computation See Tamil Nadu Taxes (Settlement of Arrears) Act, 2023, §7.

¹³ Tamil Nadu Fiscal Responsibility (Amendment) Act, 2023, §2 and Tamil Nadu Fiscal Responsibility Act, 2003, §4.

¹⁴ Tamil Nadu Shops and Establishments (Amendment) Act, 2023 added § 22-B, 22-C, 22-D, and 22-E which made provisions for drinking water, latrine & urinals, restroom & lunch room, and first aid kits respectively.

¹⁵ The Tamil Nadu Shops and Establishments (Amendment) Amendment Act, 2023 (the Gazette notification used this name for the Act).

With the aforesaid amendments the assembly enhanced the protection afforded to labourers. However, the self-same assembly repealed in its entirety the Tamil Nadu Building and Construction Workers (Conditions of Employment and Miscellaneous Provisions) Act, 1984¹⁶—a statute which had put in place a regulatory framework on working hours, overtime wages, annual leaves, safety precautions and the like.

Significantly, the Act had also incorporated provisions which enabled the government to extend the protection of various other labour legislations¹⁷ to construction workers. The repealing act abandons the entire framework without offering any reasons for the repeal, nor was there any debate on the matter held in the Assembly.

Notably, the government was forced to drop the other Bill, which proposed to add Section 65-A¹⁸ to the Factories Act of 1948 (a Union Legislation). This amendment would have further diluted labour rights as it would have allowed the State Government to exempt industries from complying with regulations relating to weekly hours,¹⁹ weekly holidays,²⁰ daily hours,²¹ rest intervals,²² and overtime wages²³ by issuing a notification to that effect. In essence, the notification would have permitted the exempted factories to extract work for more than nine hours a day without needing to provide a break, a holiday or overtime wages.

Several DMK allies staged a walk-out when the Bill was taken up for discussion, and after several protests, the Chief Minister stated that the Bill will not be pursued.²⁴

Agriculture and Agricultural Markets

The Tamil Nadu Agricultural Produce Marketing (Regulation) Second Amendment Act, 2023, has provided for two key changes, namely the setting up of a dispute resolution

¹⁶ The Tamil Nadu Building and Construction Workers (Conditions of Employment and Miscellaneous Provisions) Repeal Act, 2023

¹⁷ Such as the Payment of Wages Act, Industrial Disputes Act, Maternity Benefit Act etc – See Tamil Nadu Building and Construction Workers (Conditions of Employment and Miscellaneous Provisions) Act, 1984 §40.

¹⁸ The Factories (Tamil Nadu Amendment) Bill, 2023.

¹⁹ An exemption from complying with the Factories Act, 1948 § 51, which provided a cap of 48 hours in a week.

²⁰ An exemption from complying with the Factories Act, 1948 § 52, which mandated a weekly holiday.

²¹ An exemption from complying with the Factories Act, 1948 § 54, which provided a cap of 9 hours a week.

²² An exemption from complying with the Factories Act, 1948 § 55, which mandated that workers cannot work continuously for more than five hours without providing a break of thirty minutes.

²³ An exemption from complying with the Factories Act, 1948 § 59, which mandated an overtime wage at twice the ordinary wage rate.

²⁴ The Hindu, *T.N. government puts on hold amendment to Factories Act*, April 24, 2023, available at <https://www.thehindu.com/news/national/tamil-nadu/stalin-puts-on-hold-tns-amendments-to-factories-act/article66774137.ece> (last visited on June 22, 2024).

process²⁵ and enabling an online trading platform for agricultural produce.²⁶ The 2023 amending legislation²⁷ to the Tamil Nadu Protected Agricultural Zone Development Act of 2020, expanded the definition of agricultural activities to include animal husbandry and inland fishery.²⁸ The 2020 Act had prohibited industrial projects²⁹ in the Cauvery Delta region, which the Act had identified as a 'protected agricultural zone'.³⁰ The 2023 amendment enlarged the protection afforded under the Act.

Universities

It is pertinent to note that all the three Bills relating to universities have not received the governor's assent. Two of the Bills sought to make changes in how the appointments of Vice-Chancellors are made³¹ by transferring the power of appointment from the governor to the chief minister. The other bill, namely, the Tamil Nadu Private Universities (Amendment) Bill, 2023, sought to grant the status of 'Private University' to seven educational institutions.

Government Servants (Recruitment and Conditions of Service)

Section 21A was added by an amendment to the Tamil Nadu Government Servants (Conditions of Service) Act, 2016.³² This mandated the inclusion of a compulsory exam in the Tamil language for all recruitments to services under the state. The Tamil Nadu Payment of Salaries (Amendment) Act, 2023, sanctioned a payment of pension to past members of the legislative assembly and the erstwhile legislative council.

Repeal of Legislations

The TNLA repealed three hundred and sixty legislations in the year 2023.³³ Legislations which were repealed can be broadly categorised under the following three heads: firstly,

²⁵ Specific disputes mentioned in the Tamil Nadu Agricultural Produce Marketing (Regulation) Act, 1987 §7-D, *inserted vide* the Tamil Nadu Agricultural Produce Marketing (Regulation) Second Amendment Act, 2023 (w.e.f. January 30, 2024)

²⁶ Section 8-B and 8-C of The Tamil Nadu Agricultural Produce Marketing (Regulation) Act, 1987, §8-B and 8-C *inserted vide* the Tamil Nadu Agricultural Produce Marketing (Regulation) Second Amendment Act, 2023 (w.e.f. January 30, 2024)

²⁷ Tamil Nadu Protected Agricultural Zone Development (Amendment) Act, 2023.

²⁸ *Id.*, §2.

²⁹ Tamil Nadu Protected Agricultural Zone Development Act, 2020, §4(1) read with the II Schedule of the Act.

³⁰ Tamil Nadu Protected Agricultural Zone Development Act, 2020, §2(h) read with the First Schedule details all the districts protected under the said Act.

³¹ Tamil Nadu Veterinary and Animal Sciences University (Amendment) Bill, 2023 and the Tamil Nadu Fisheries University (Amendment) Bill, 2023.

³² Tamil Nadu Government Servants (Conditions of Service) Amendment Act, 2023.

³³ The Tamil Nadu Repealing Act, 2023, repealed 169 legislations, The Tamil Nadu Repealing (Second) Act, 2023, repealed 175 legislations and The Tamil Nadu Repealing (Third) Act, 2023, repealed 16 legislations.

amending Acts; second, legislation that had become obsolete as they had been replaced by other legislation. For instance, it repealed the Tamil Nadu Right to Information Act of 1997 in light of the Union legislation covering the same. And lastly, legislations regarding land acquisition and control of certain lands dedicated for religious purposes (*imam land and pandaravaka land*).

Land Acquisition and Urban Planning

Two enactments are discussed in this section. The first one is the Tamil Nadu Town and Country Planning Act of 1971, which was amended to facilitate land pooling area development.³⁴ Under this scheme, a planning authority can develop land owned by private individuals and a portion of the land is transferred back to the original owners. While the rest is used for establishing common facilities and sale by the planning authority.

The second enactment is the Tamil Nadu Land Consolidation (for Special Projects) Act, 2023, which was passed without discussion, and there have been several protests against this enactment. This Act allows for an easier process by which private persons/companies can acquire government land if the state recognises it as a ‘special project’.³⁵ Projects eligible for recognition as a ‘special project’ must be infrastructural, industrial, commercial or agricultural projects³⁶ which require over a hundred hectares of land. The hundred hectares mentioned above include land owned by the project proponent and the government which is sought to be acquired for the project.

Once the government notifies a project as a ‘special project’³⁷ an expert committee prepares a draft land consolidation scheme, which is published as part of the public consultation process. 30 days after publication of the draft, the final land consolidation scheme is forwarded to the relevant authority, who may within two months approve the project with or without modifications.³⁸ It is pertinent to note that the relevant authority does not have the option of rejecting the land consolidation scheme and can only provide a mechanism to cancel it if the specified pre-conditions are not met.³⁹ So essentially, once the government recognises a project as a special project, ‘the consolidated acquisition of land’ is more or less

³⁴ Tamil Nadu Town and Country Planning (Third Amendment) Amendment Act, 2023, §2.

³⁵ Tamil Nadu Land Consolidation (for Special Projects) Act, 2023, §2(l).

³⁶ Id., §2(i).

³⁷ Id., §3.

³⁸ Id., §7(2).

³⁹ Id., § 7(3).

final. Furthermore, the government retains the power to call for records and pass orders that it deems fit at any stage of the process.⁴⁰

Even though the Act prima facie contains provisions for the protection of water capacity on the project land, several people have voiced opinions that the protection afforded is insufficient and that the Act is intended to facilitate land acquisition by bypassing methods that are more stringent in the name of ease of business.⁴¹

Prohibition of Hookah

The State government had attempted to shut down or prevent several places of business that served 'hookah' in the State of Tamil Nadu. A business establishment challenged these actions as having no basis in law before the Madras High Court. In *Robustaa (Hyglow Cafe) v. The Commissioner, Corporation of Chennai*, the High Court found the State's actions to be unconstitutional as it was not backed by law. This judgment was appealed before the Supreme Court, which by a common judgment upheld the decision of the High Court.⁴²

The Supreme Court held that the sale of hookah was regulated and not prohibited under 'The Cigarettes and Other Tobacco Products Act, 2003' (Hereinafter referred to as the 'COTPA'), and insofar as the conditions prescribed under the Act were followed, the establishments were at liberty to sell hookah. Following this precedent, the Madras High Court, on several subsequent instances, had restrained the state from shutting down establishments that sold hookah.⁴³

Responding to this judicial interpretation, the assembly legislatively prohibited the sale of hookah by amending the central legislation, i.e. the COTPA and added Sections 4A and 21A vide the Tamil Nadu Amendment Act, 2022. This amendment was approved by the President of India on 21st June 2023. The constitutionality of this amendment has been challenged before the High Court in *Coin Cafe Restaurant v. The Chief Secretary to the Government*.⁴⁴ The petitioners argue that the State did not have the legislative competence to legislate on tobacco as it falls under the exclusive competence of the Union

⁴⁰ Id., §9.

⁴¹ The Times of India, *Why New Land Bill Threatens Waterways, and Human Rights*, June 7, 2023, available at <https://timesofindia.indiatimes.com/city/chennai/why-new-land-bill-threatens-waterways-and-human-rights/articleshow/100806952.cms> (last visited on June 22, 2024).

⁴² 2014 INSC 844.

⁴³ *Jay Shah v. Commissioner of Police, Chennai*, CrI. O.P. No. 31460 of 2022 (Mad. H.C.), *Aariyan Foods vs The Commissioner Of Police*, W.P. No.18608 of 2021 (Mad. H.C.), *Billionaire Brothers vs The Commissioner Of Police*, W.P. No. 6567 of 2022 (Mad. H.C.), *Cuisines Private Limited vs The Commissioner Of Police*, W.P. No. 20180 of 2022 (Mad. H.C.), etc.,

⁴⁴ W.P. No. 5853 of 2024 (Mad. H.C.).

Government.⁴⁵ The High Court has issued notice to the state in the said petition, and the matter is pending before the Court.

Prohibition of Gambling

The State had earlier attempted to prohibit online betting and gambling by way of legislation, which was passed in 2021;⁴⁶ this statute prohibited all forms of online betting and gambling, including 'rummy' and 'poker'. The legislation was challenged before the Madras High Court in *Junglee Games India Pvt. Ltd. v. State of Tamil Nadu*.⁴⁷

The crux of the challenge was that the prohibition of 'rummy' and 'poker' was constitutionally invalid. The Supreme Court, in the RMDC cases,⁴⁸ had held that 'games of skill' could not be prohibited, whereas 'games purely based on chance' could be prohibited/regulated. The petitioners argued that 'rummy' and 'poker' are games of skill. They relied on observations of the Supreme Court in *State of Andhra Pradesh v. K. Satyanarayana*,⁴⁹ and the 276th Law Commission report, both of which had observed that 'rummy' and 'poker' were games of skill.

The Madras High Court, while examining the above law, held that the law was too broad as it banned 'games of skill' such as rummy and poker. It held that the legislation failed to meet the test of proportionality as the state had no data to show that such a wide ban was necessary and struck down the legislation as the state had not employed the least intrusive measure.

The government responded by constituting a committee headed by K. Chandru (Former Judge of the Madras High Court) and, based on the recommendations of the committee, promulgated the Tamil Nadu Prohibition of Online Gambling and Regulation of Online Games Ordinance, 2022, and subsequently sought to replace the ordinance with the legislation which was *pari materia* with the ordinance. The Governor, in the first instance, refused to assent to the legislation and returned the bill after 131 days with a note that he had not assented to the Bill as its constitutionality was suspect.

The assembly reconsidered the bill on 23 March, 2023, and forwarded it to the governor for his assent without any modification. The governor, on 7 April, 2023, assented to adopting

⁴⁵ The Constitution of India, 1950, Schedule VII, Entry 84.

⁴⁶ Tamil Nadu Gaming and Police Laws (Amendment) Act, 2021, amending the Tamil Nadu Gaming Act, 1930.

⁴⁷ W.P. No. 18022 of 2020 (Mad. H.C.).

⁴⁸ *State of Bombay v. RMD Chamarbaugwala*, AIR 1957 SC 699 and *R.M.D. Chamarbaugwala v. Union of India*, AIR 1957 SC 628.

⁴⁹ *State of Andhra Pradesh v. K. Satyanarayana*, AIR 1968 SC 825 at Paragraph 12.

The Tamil Nadu Prohibition of Online Gambling and Regulation of Online Games Act, 2022, and it came into force on 21 April, 2023.

The entirety of the statute was challenged before the Madras High Court in *All India Gaming Federation v. The State of Tamil Nadu*⁵⁰ on the grounds that the legislation was over broad because it prohibited betting on 'games of skill' such as 'rummy' and 'poker'. The Court, vide its judgment dated 9 November, 2023, agreed with the petitioners and read down sections 2(i) and 2(l)(iv), thereby restricting the ambit of the Act to prohibiting gambling only on games of chance and not games of skill. Thus, it held that 'games of skill', which in the court's opinion includes 'rummy' and 'poker', cannot be prohibited by the state but can only be regulated.

The State of Tamil Nadu filed a special leave appeal against the decision in the Supreme Court and the apex court has issued notice in the matter.⁵¹ It's pertinent to note that this is the second time that the TNLA legislation attempting to prohibit online rummy and poker has been struck down by the Madras High Court.

Resolutions by the TNLA

In accordance with Article 176, the inaugural sitting of the Assembly in the year starts with the Governor's address. It is a long-standing convention that the government prepares the address. The TNLA's inaugural sitting witnessed the Governor, TN Ravi, deviating from the text which the government had prepared. The Chief Minister disapproved of the deviation, which led to the Governor walking out of the Assembly session.⁵² The strained relationship between the government and TNLA impacted the legislative functions of the Assembly as the Governor withheld assent for Bills. The TNLA initially adopted a resolution urging the Centre to direct the governor to grant assent, and subsequently also filed a petition to the Supreme Court urging it to issue guidelines.⁵³

The other notable resolutions where the TNLA urged the centre to act were a) directing Karnataka to release Cauvery water,⁵⁴ b) Demanding that the Centre expand the

⁵⁰ *All India Gaming Federation v. The State of Tamil Nadu*, W.P. No.13203 of 2023 (Mad. H.C.).

⁵¹ SLP(C). 1588/2024 (S.C.) (Pending).

⁵² *The Hindu*, *Tamil Nadu Governor R.N. Ravi walks out of House as Chief Minister M.K. Stalin objects to deviation from speech*, January 9, 2023, available at <https://www.thehindu.com/news/national/tamil-nadu/at-first-tn-assembly-session-of-2023-a-governor-vs-cm-face-off/article66356004.ece> (last visited on June 22, 2024).

⁵³ *State of Tamil Nadu v. The Governor of Tamil Nadu*, W.P. (C) No. 1239 of 2023 (S.C.) (pending).

⁵⁴ *The Hindu*, *T.N. Assembly adopts resolution urging Centre to direct Karnataka to release Cauvery water*, October 9, 2023, available at <https://www.thehindu.com/news/national/tamil-nadu/tn-assembly-adopts-resolution-urging-centre-to-direct-karnataka-to-release-cauvery-water/article67398918.ece> (last visited on June 22, 2024).

reservations provided to Schedule Caste communities to people who have converted,⁵⁵ (On both of these occasions, BJP members of the house staged a walkout.) c) Demanding that the CRPF exams be conducted in Tamil .⁵⁶

Conclusion

In conclusion, I draw attention to two significant features. Firstly, in quantitative terms, the TNLA has spent very little time on the discussion and deliberation of Bills. Despite that, the opposition and the allies have still managed to play some role in the Assembly. They were able to force the Government to withdraw the amendment to the Factories Act, but could not get the assembly to deliberate on the controversial Land Consolidation Act.

Secondly, TNLA has continued to play a significant role in furthering federal principles. It has resolved to no longer use the phrase 'central government' and has consistently used the phrase 'union government' to draw attention to the federal nature of our polity. The strained relationship between the governor and the assembly, as evidenced by issues relating to the content of the inaugural address and the delay in assenting to bills, has raised important federal concerns.

⁵⁵ The Hindu, *Tamil Nadu Assembly adopts resolution urging Centre to extend reservations to Dalit Christians*, April 19, 2023, available at <https://www.thehindu.com/news/national/tamil-nadu/tamil-nadu-assembly-adopts-resolution-urging-centre-to-extend-reservations-to-christian-adi-dravidars/article66754950.ece> (last visited on June 22, 2024).

⁵⁶ The Hindu, *Tamil Nadu CM Stalin writes to Amit Shah for including Tamil and other regional languages in CRPF recruitment test*, April 9, 2023, available at <https://www.thehindu.com/news/national/stalin-writes-to-amit-shah-for-including-tamil-and-other-regional-languages-in-crpf-recruitment-test/article66716547.ece> (last visited on June 22, 2024).