

Minerva Mills Ltd. and Ors. v. Union of India and Ors. is a significant legal case in the constitutional history of India. The case deals with several key constitutional issues, primarily concerning the balance of power between the judiciary and the legislature, as well as the doctrine of basic structure. Here's an analysis of the case:

Background:

The case was heard by the Supreme Court of India in 1980. It revolved around the validity of two constitutional amendments: the 42nd Amendment Act of 1976 and the 44th Amendment Act of 1978.

Key Issues:

42nd Amendment Act: The 42nd Amendment Act had made extensive changes to the Indian Constitution. Among its provisions was the insertion of Article 368(2) which asserted that the Parliament's power to amend the Constitution was unlimited, and no amendment could be called into question in any court on any ground. This raised the question of whether Parliament's power to amend the Constitution could be absolute and unlimited.

Basic Structure Doctrine: The case also considered the doctrine of the "basic structure" of the Constitution. The question was whether the fundamental structure of the Constitution could be altered through amendments or whether there were inherent limitations on the amending power of the Parliament.

Judgment:

The Supreme Court, in a landmark judgment, declared several provisions of the 42nd Amendment Act as unconstitutional. It held that while Parliament had the power to amend the Constitution under Article 368, this power was not unlimited. The court asserted that Parliament could not abrogate or change the "basic structure" of the Constitution. The "basic structure" included the principles of democracy, rule of law, federalism, and secularism, among others. The Court also stated that it had the authority to review and strike down amendments that violated the basic structure.

Significance:

Basic Structure Doctrine: The Minerva Mills case firmly established the doctrine of the "basic structure" of the Indian Constitution, which limits Parliament's power to amend the Constitution. It ensured that certain core principles of the Constitution remain inviolable and unamendable, protecting the fundamental character of the Constitution.

Judicial Review: The case reasserted the principle of judicial review and the judiciary's role in upholding the Constitution's integrity. It confirmed the judiciary's authority to review constitutional amendments for their compatibility with the basic structure.

Separation of Powers: The judgment reinforced the idea of a separation of powers between the three branches of the government. It emphasized that while the Parliament has the power to amend the Constitution, it cannot undermine the Constitution's basic structure or the judiciary's role in preserving it.

Legal and Political Landscape: The Minerva Mills case had a profound impact on the legal and political landscape of India. It restrained the Parliament's ability to make arbitrary changes to the Constitution and safeguarded key democratic and secular values.

In summary, Minerva Mills v. Union of India is a landmark case that clarified the limitations on Parliament's amending power by introducing the concept of the "basic structure" doctrine. It reinforced the importance of judicial review in preserving the fundamental principles of the Indian Constitution and has had a lasting impact on constitutional law in India.