

SYNOPSIS / LIST OF DATES

As early as 9000 BC, evidences of agricultural system in practice have been recorded in the Indian subcontinent. The agricultural sector inevitably plays a fundamental role in the prosperity of the country's GDP and employment of 58 % of the working population. A large portion i.e 65.53% consists of rural population and depends on agriculture as their principal means of livelihood. Thus, the common man, agriculture and the Indian economy are umbilical to one another.

Pre-independence British rule can be divided into two periods (i) Rule of the East India Company (1757-1858) and (ii) Rule of the British government (1858 to 1947). The British introduced the Land Settlement Act in 1793 and commercialization of agriculture which led to the disintegration of village community. The new land policy made highly fixed land revenue as the principle source of income for the company. Permanent settlement Act was imposed in Bengal and neighboring areas and in places like Bombay, Madras and subsequently in north-eastern and north-western India, Ryotwari Settlement Act was established where the peasant holding a plot of land was seen as the owner and directly responsible for the annual payment of land-revenue. The land system introduced by the British was designed to concentrate power in the hands of the absentee landlords and moneylenders.

Between 1850 to 1947, a policy for commercialization of Agriculture (*production of crop for sale rather than family consumption*) was initiated for serving the interest of the

British industries. Raw materials such as cotton, jute, sugarcane, groundnuts etc were in high demand from British India. A higher market price was set for commercial crops compared to food crops leading to a fall in the production of basic food and unfortunately was accompanied by the worst famine in the economic history of India. The shift towards commercial agriculture was also to some extent, the result of the pressure of high land revenues on the peasants demanded by the state and excessive rents imposed by the landlords. The introduction of railways linked the interiors of rural areas to urban marketing centers which made British India produce goods for world markets thus, intensifying commercial agriculture on one hand and increasing the competition of Indian handicrafts with machine-made goods and ultimately ruining the Indian industries. The British land policy stunted the growth and development of India's agriculture system.

On the eve of India's independence, the food grain production was at a level where India had to import to meet the minimum needs of the population. Attainment of self-sufficiency in agriculture was made a top priority which was reflected in policies and investment decisions particularly in regards to irrigation, fertilizers, land reforms etc. An improved agricultural technology for crop production in the form of Green Revolution was introduced- high yielding variety of seeds, large scale usage of fertilizers and pesticides, mechanization of agriculture was adopted. With a new record gain in output came problems such as promotion of wheat-rice monoculture on a narrow and alien genetic base, conversion of

forest land into agriculture land, overgrazing, toxic chemicals were causing health hazards. Although there was an improvement in India's system, adequate rights for the farming community was lacking.

One of the major concerns of the government prior to independence was keeping a check on the prices of food for the consumers and agro-raw materials in check. Post-independence, protection of farmers and provision of incentive prices in order to increase the prices of agricultural commodities became important. The APMC Model Act of 2003 was introduced to fulfill two principles- a) to ensure no farmer is exploited by intermediaries and b) all food produce to be brought to a common market to sell through auction.

As of 2009-10, more than half of the total workforce (53%) of the country, i.e. 243 million persons were employed in agriculture. The share of population depending on agriculture for its livelihood consists of landowners, tenant farmers who cultivate a piece of land and agricultural labourers who are employed on these farms. Agricultural output has been volatile over the past 10 years, with annual growth ranging from 8.6% in 2010-11, to -0.2% in 2014-15 and 0.8% in 2015-16.

Without Agricultural Produce Market Committee (APMC) acting as a protective shield around the farmers, the market would ultimately fall to the corporate greed of multinational companies who are more profit oriented and have no care for the conditions of the poverty stricken farmers who are

dependent on farming for their livelihood. The APMC deterred the exploitation of the farmers by providing minimum support price which would guarantee that the farmer who comes to the APMC would not leave empty handed.

Indian Agriculture is characterised by fragmentation due to small holdings and has certain inherent weaknesses beyond control such as dependence on weather, uncertainties in production and an unpredictable market. This makes agriculture risky and inefficient in respect of both input and output management. These challenges cannot be addressed by way of monetization of the farmer's produce to increase the farmers' income instead strengthening the existing Agricultural Produce Market Committee (APMC) system by infusing more capital and effective management of Minimum Support Price is the need of the hour. The promotion of agreements for farming produce will weaken the process of monetization as per current structure of The Farmers' (Empowerment and Protection) Agreement of Price Assurance and Farm Services Act, 2020. Through the provisions mentioned in the above noted act, de-risking of agriculture as claimed by the Government at various stages is wrong on the analysis of the provisions enacted.

The number of farmers that the Centre assumed for calculating the cost of PM-Kisan scheme is from the Agriculture Census of 2015-16 which had put the number of operational agriculture landholdings in the country at 14.5 crores. The matter is of substantial public interest and is emergent as there is need for

striking down laws which violate the rights of the 14.5 crore citizens who are engaged in farming before serious financial damage is caused to them and the families of such persons.

By the way of the present petition under Article 32, the Petitioner challenges the constitutionality of The Farmers' (Empowerment and Protection) Agreement of Price Assurance and Farm Services Act, 2020 and is being filed challenging Section(s) 2, 3, 4, 5, 6, 7, 13, 14, 18 and 19 of the impugned Act which to came force on 27.09.2020. It is submitted that this act is violative of Article 14, 15 and 21 of the Constitution of India and accordingly, liable to be struck down as Unconstitutional, illegal and void.

The facts in brief and list of dates leading to this petition are given herein after:-

05.06.2020: As the Parliament was not in session and there was an immediate need for legislation in this regard, the Farmers (Empowerment and Protection) Agreement on Price Assurance and Farm Services Ordinance, 2020 was promulgated by the President of India on the 5th June, 2020 under clause (1) of article 123 of the Constitution.

14.09.2020: The Farmers (Empowerment and Protection) Agreement on Price Assurance and Farm Services Ordinance, 2020 was introduced in Lok Sabha.

- 17.09.2020 The Farmers (Empowerment and Protection) Agreement on Price Assurance and Farm Services Ordinance, 2020 was passed in Lok Sabha
- 20.09.2020: The Farmers (Empowerment and Protection) Agreement on Price Assurance and Farm Services Ordinance, 2020 was passed in Rajya Sabha.
- 24.09.2020 The Hon'ble President of India grants assent to the Farmers (Empowerment and Protection) Agreement on Price Assurance and Farm Services Ordinance, 2020.
- 28.09.2020: Hence the present Special Leave Petition.

IN THE SUPREME COURT OF INDIA
(CIVIL ORIGINAL JURISDICTION)
PUBLIC INTEREST LITIGATION
(Under Article 32 of the Constitution of India)
WRIT PETITION (CIVIL) NO. _____ OF 2020

(A Writ Petition Under Article 32 Of The Constitution Of India for issuance of a writ, order or direction in the nature of mandamus or any other appropriate writ, order or direction, directing the Respondents herein to declare the provisions of The Farmers' (Empowerment and Protection) Agreement of Price Assurance and Farm Services Act, 2020 and related notifications as Unconstitutional, illegal and void)

IN THE MATTER OF:

T.N. Prathapan

Petitioner

Versus

1. Union of India
Through Secretary,
Ministry of Agriculture
& Farmers' Welfare
,
North Block, Raisina Hills,
New Delhi, Delhi – 110001.

Respondent
No.1

Respondent
No.2

2. Department of Agriculture &
Cooperation,
Through Principal Secretary
Ministry of Agriculture and
Farmers Welfare, Krishi,
Bhawan Rajendra Prasad,
Road, New Delhi-110001

Respondent
No.3

3. Union of India
Through Principal Secretary,
Ministry of Law & Justice,
4th Floor, A-Wing,
Shastri Bhawan,
New Delhi, Delhi – 110001

**WRIT PETITION UNDER ARTICLES 32 OF
THE CONSTITUTION OF INDIA FOR
ISSUANCE OF A WRIT, ORDER OR
DIRECTION IN THE NATURE OF MANDAMUS
OR ANY OTHER APPROPRIATE WRIT,
ORDER OR DIRECTION, DIRECTING THE
RESPONDENTS HEREIN TO DECLARE THE
PROVISIONS OF THE FARMERS'
(EMPOWERMENT AND PROTECTION)
AGREEMENT OF PRICE ASSURANCE AND
FARM SERVICES BILL, 2020 AND RELATED**

**NOTIFICATIONS AS UNCONSTITUTIONAL,
ILLEGAL AND VOID**

To,

**The Hon'ble Chief Justice of India
and His Companion Justices of the
Supreme Court of India**

The Writ Petition of the Petitioner

MOST RESPECTFULLY SHOWETH :

1. That the petitioner is filing the instant Writ Petition in this Hon'ble Court challenging the constitutionality of The Farmers' (Empowerment and Protection) Agreement of Price Assurance and Farm Services Bill, 2020 and is filed challenging Section(s) 2, 3, 4, 5, 6, 7, 13, 14, 18 and 19 of the impugned Act which came force 27.09.2020. It is submitted that this act is violative of Article 14, 15 and 21 of the Constitution of India and accordingly, liable to be struck down as Unconstitutional, illegal and void.

ARRAY OF PARTIES:

2. The Petitioner herein is a citizen of India and is the Member of Parliament from the Thrissur constituency, Kerala, he is also a farmer and is well versed with the difficulties being faced by the farmers due to various governmental policies and in order to highlight the cause of the farmers struggling during the present pandemic has filed the present petition.

3. The Respondent No. 1 is the Union of India, represented by the Ministry of Agriculture & Farmers' Welfare, which is the appropriate ministry dealing with the subject of agriculture.
4. The Respondent No.2 Department of Agriculture & Cooperation Ministry of Agriculture and Farmers Welfare, Krishi Bhawan Rajendra Prasad Road, New Delhi- 110001 A-Wing, Shastri Bhawan, New Delhi, Delhi – 110001.
5. The Respondent No.3 Union of India, Through Principal Secretary, Ministry of Law & Justice, 4th Floor, A-Wing, Shastri Bhawan, New Delhi, Delhi – 110001.
6. The Petitioner herein has not filed any similar Writ Petition either in this Hon'ble Court or any other High Court for the reliefs sought in the present Writ Petition. The petitioner is aggrieved by the Section(s) 2, 3, 4, 5, 6, 7, 13, 14, 18 and 19 of the impugned Act which came force 27.09.2020 that proper representation and opinions were not taken from the stake holders before passing this law.
7. That the Petitioner herein has locus standi to file the instant Writ Petition as he being the representative of the parliamentary constituency of Thrissur and he is also a farmer who is well versed with the difficulties being faced by the farmers due to various governmental policies and in order to help the farmers struggling during the present

pandemic he has established a company named as God's Own Farmers Producer Company Ltd on 06.08.2020.

8. The Farmers' (Empowerment and Protection) Agreement of Price Assurance and Farm Services Bill, 2020 has been hastily passed without having adequate discussion on it, that a bare reading of its provisions will reveal that it is not a progressive piece of legislation. In fact, the implementation of the act in its current form will spell disaster for the farming community by opening a parallel market which is unregulated and gives enough room for exploitation of the farmers' community by concentration of power in the hands of a few corporates/individuals, multinationals and moneylenders thus working against the very object it was seemingly created for.
9. That certain sections/provisions of The Farmers' (Empowerment and Protection) Agreement of Price Assurance and Farm Services Bill, 2020 are in fact against the basic structure of the Constitution and fundamental rights of the farmers as it puts them in a position wherein if any dispute arises, the farmer will be running towards the already overburdened bureaucracy for a remedy instead of getting an effective and permanent solution to his problem in a court of law.
10. That the present act also fails to establish farmer centric courts where the farmers can raise their

grievances, similar to the ones created under the labor act, consumer act, family courts act etc. instead the act gives the responsibility to Sub divisional Magistrate who already has multiple other duties and functions to perform.

11. That unchecked hoarding will give exporters, processors and traders the power to regulate the prices of the produce as and when they need, creating artificial demand thus controlling price in the market at will.
12. Facts of the case are as follows:
 - i. The Agricultural sector plays a fundamental role in the prosperity of the country's GDP and employment of 58 percent of the working population. A large portion of 65.53% consisting of rural population, depends on Agriculture as their principal means of livelihood. Thus, the common man, Agriculture and the Indian economy is intrinsically linked to one another.
 - ii. The agricultural policy followed during this period can be distinguished in four phases: first phase considered from 1947 to mid sixties, second phase considered period from mid-sixties to 1980, third phase included period from 1980 to 1991, and forth phase includes period from 1991/92 onwards.

iii. The first phase of agricultural policy witnessed tremendous agrarian reforms, institutional changes, development of major irrigation project and strengthens of cooperative credit institution. The most important contribution of land reforms was abolition of intermediaries and giving land titles to the actual cultivators. This released productive forces and the owner cultivators put in their best to augment production on their holdings. Land reforms were important in increasing agricultural production during this phase. The Community Development Programme, decentralised planning and the Intensive Area Development Programmes were also initiated for regenerating Indian agriculture that had stagnated during the British period. In order to encourage the farmers to adopt better technology, incentive price policy was adopted in 1964 and the Agricultural Price Commission was set up to advice the Government on the fixation of support prices of agricultural crops. Despite the institutional changes and development programmes introduced by the Government during this phase, India remained dependent upon foreign countries for food to feed the rising population.

- iv. The second phase in Indian agriculture started in mid 1960s with adoption of new agricultural strategy. The new agricultural strategy relies on high-yielding varieties of crops, multiple cropping, the package approach, modern farm practices and spread of irrigation facilities. The biggest achievement of this strategy has been attainment of self sufficiency in foodgrains. Agrarian reforms during this period took back seat while research, extension, input supply, credit, marketing, price support and spread of technology were the prime concern of policy makers (Rao, 1996).
- v. The next phase in Indian agriculture began in early 1980s. This period started witnessing process of diversification which resulted into fast growth in non-foodgrains output like milk, fishery, poultry, vegetables, fruits etc which accelerated growth in agricultural GDP during the 1980s (Chand, 2003). There has been a considerable increase in subsidies and support to agriculture sector during this period while public sector spending in agriculture for infrastructure development started showing decline in real term but investment by farmers kept on moving on a rising trend (Mishra and Chand, 1995; Chand, 2001).

- vi. The fourth phase of agricultural policy started after initiation of economic reform process in 1991. Economic reforms process involved deregulation, reduced government participation in economic activities, and liberalization. Although there is no any direct reforms for agriculture but the sector was affected indirectly by devaluation of exchange rate, liberalization of external trade and disprotection to industry. During this period opening up of domestic market due to new international trade accord and WTO was another change that affected agriculture. This raised new challenges among policymakers. Because of this, a New Agricultural Policy was launched by Indian Government in July 2000. This aims to attain output growth rate of 4 percent per annum in agriculture sector based on efficient use of resources. It seeks to achieve this objective in a sustainable manner and with equity. This was first time when government released a national agriculture policy. The policy document discusses what ought to be done in agriculture but the subsequent step, how and when policy goals and objective would be achieved is not discussed (Chand, 2003). Therefore, it is highly desirable to prepare action plans at both centre and state level

in quantity terms to implement the new policy agenda in a time bound framework.

- vii. As of 2009-10, more than half of the total workforce (53%) of the country, i.e. 243 million persons were employed in agriculture. The share of population depending on agriculture for its livelihood consists of landowners, tenant farmers who cultivate a piece of land, and agricultural labourers who are employed on these farms. Agricultural output has been volatile over the past 10 years, with annual growth ranging from 8.6% in 2010-11, to -0.2% in 2014-15 and 0.8% in 2015-16.
- viii. The number of farmers that the Centre assumed for calculating the cost of PM-Kisan scheme is from the Agriculture Census 2015-16 which had put the number of operational agriculture landholdings in the country at 14.5 crore.
- ix. On 03.08.2018 Ministry Of Agriculture And Farmers Welfare filed its 56th Standing Committee Report in the Lok Sabha. Page 31 of the said report states *“To achieve the target of doubling the income of farmers by 2022, the Government has constituted an Inter-Ministerial Committee on 13.04.2016 under the Chairmanship of Chief Executive Officer, National Rainfed Area Authority,*

Department of Agriculture, Cooperation and Farmers Welfare to examine issues relating to doubling of farmers' income and recommend a strategy to achieve the same. Based on the some recommendations of the Committee, the Department has initiated the following steps"...

"The Government is aiming to reorient the agriculture sector by making it income-centric rather than purely a production-centric activity. A farmer's income is a basket of earnings from agriculture (including horticulture), allied activities like dairy, livestock, poultry, fishery etc. and ancillary activities like beekeeping etc. Apart from these farm incomes, he also earns from other activities like wage labour, off-farm activities etc. Earnings from agriculture constitute the principal source of income of a farmer".

A true Copy of the said Report dated 03.08.2018 is marked herewith as **Annexure P-1**.

- x. Subsequent to the said report, the government decided to bring in the Farmers (Empowerment and Protection) Agreement on Price Assurance and Farm Services Ordinance, 2020 on 05.06.2020.
- xi. Even after staunch opposition by the opposition and protest by farmers, on 24.09.2020 the Hon'ble

President of India granted assent to the Farmers (Empowerment and Protection) Agreement on Price Assurance and Farm Services Act, 2020.

A true Copy of the Farmers (Empowerment and Protection) Agreement on Price Assurance and Farm Services Act, 2020 is marked herewith as **Annexure P-2**.

13. That being aggrieved by passing of The Farmers' (Empowerment and Protection) Agreement of Price Assurance and Farm Services Act, 2020 and related notifications which severely affect 14.5 crore farmers in the our country, the petitioner is compelled to approach this Hon'ble Court through this Writ Petition under Article 32 of the Constitution of India and urges the following amongst other grounds:

GROUND:

- I. Because the present case requires interference by this Hon'ble Court under Article 32 of the Constitution of India because the provisions of The Farmers (Empowerment and Protection) Agreement on Price Assurance and Farm Services Act, 2020 are against the interest of the farmers of our country. In addition they clearly violate Articles 14, 15 and 21 of the Constitution, as well as the Constitution's basic structure, for reasons that are set out below.

- II. Because the Act is violative of conditions discussed in Directive Principle of State policy enshrined in Part IV of the Constitution of India wherein it is the duty of the state to ensure decent standard of life to all workers. This Act will open the doors to unchecked exploitations of the farmers, who are unaware of even their basic rights.
- III. Because vide Section 2(e) which is the Definition clause of the impugned Act, a *"farmer"* means an individual engaged in the production of farming produce by self or by hired labour or otherwise, and includes the Farmer Producer Organisation". It does not identify the labour/tiller/share cropper working in the farm as a farmer, which is in essence discriminatory as it undermines their effort and further, it leaves out the rights of the labour/share cropper who is actually doing the hard labour to help produce/irrigate the farm.
- IV. Because under Section 2(g) of the impugned Act *"farming agreement"* means a written agreement entered into between a farmer and a Sponsor, or a farmer, a Sponsor and any third party, prior to the production or rearing of any farming produce of a **predetermined quality**, in which the Sponsor agrees to purchase such farming produce from the farmer and to provide farm services" the predetermined quality

clause is a recipe for disaster as it will give the sponsor the opportunity to make flimsy excuses and refuse the yield or re-negotiate the price.

- V. Because the section 4 of the Impugned Act reads as follows: “4(1) *The parties entering into a farming agreement may identify and require as a condition for the performance of such agreement compliance with mutually acceptable quality, grade and standards of a farming produce*” That the standards used for farming produce may be more profit oriented and the parties involved may over look the environmental impact of such “standards” leaving the land barren or unfertile due to excessive and over use. Once the land loses its fertility properties, the farmer will lose his only source of income. Even if the Government sets standards for any such farming, there is no governmental agency in the act that will monitor such compliance.
- VI. Because as per the section 4(4) of the Act, “*The parties entering into a farming agreement may require as a condition that such mutually acceptable quality, grade and standards shall be monitored and certified during the process of cultivation or rearing, or at the time of delivery, by third party qualified assayers to ensure impartiality and fairness*” there is no guarantee or safety with regards to a third party

assayer, government should have assayers who would ensure proper inspection and an unbiased report.

VII. That as per section 13 of impugned act which states that “13(1)Every farming agreement shall explicitly provide for a conciliation process and formation of a conciliation board consisting of representatives of parties to the agreement: Provided that representation of parties in such conciliation board shall be fair and balanced” .The particular section of the Act does not define or make it clear who will be allowed to represent the parties, therefore, the dispute resolution system is unclear on how effective assistance will be provided. This provision without going into the specific details as to who the said representatives would be, has made an omnibus declaration which opens up the provision to ambiguity thereby leading to chaos and confusion.

VIII. That as per section 14 of the Impugned Act which reads as follows: “14 (1) Where, the farming agreement does not provide for conciliation process as required under sub-section (1) of section 13, or the parties to the farming agreement fail to settle their dispute under that section within a period of thirty days, then, any such party may approach the concerned Sub-Divisional Magistrate who shall be the

Sub-Divisional Authority for deciding the disputes under farming agreements". Through this provision the government wants a *Laissez'faire* market by making our already overburdened bureaucracy to help solve farmers' issues is unimaginable, thus this particular system of adjudication is already destined to fail. The aggrieved farmer will have no time to work if he is regularly ensconced in the government office..

- IX. Because the Section 18 of the act "*18. No suit, prosecution or other legal proceeding shall lie against the Central Government, the State Government, the Registration Authority, the Sub-Divisional Authority, the Appellate Authority or any other person for anything which is in good faith done or intended to be done under the provisions of this Act or any rule made thereunder*" practically legalizes any form of decisions based on corruption by a public officer, if the SDM takes a decision in conflict of interest that act provides ample protection under the garb of "in good faith" to such illegal actions. Such widely drafted provision not only leaves scope for mischief but also questions the bonafides of the legislature.
- X. Because the Section 19 of the act "*19. No civil Court shall have jurisdiction to entertain any suit or proceedings in respect of any dispute which a Sub-*

Divisional Authority or the Appellate Authority is empowered by or under this Act to decide and no injunction shall be granted by any court or other authority in respect of any action taken or to be taken in pursuance of any power conferred by or under this Act or any rules made thereunder” is violative of basic fundamental rights granted by our Constitution for adequate legal assistance. By limiting one’s right to approach a court of law, this is making the Executive an all-pervasive and all-encompassing force which is completely in violation of rule of law. Further, it presupposes that any decision taken by the Divisional Authority or the Appellate Authority would be correct in law which is subverting the check and balance functioning of the Judiciary. It is pertinent to also add that by taking away power to grant an interim relief such as stay, one is forced to wonder whether this Act claims to ameliorate farmers’ plight or do the opposite by pandering to vested interests of a few at the cost of the poor farmer.

XI. BECAUSE at the heart of the right to life and personal liberty under Article 21 is the right to human dignity *Justice K.S. Puttaswamy v Union of India*. *Bobde J.* (as his Lordship then was) noted that there are “*two values whose protection is a matter of universal moral agreement: the innate dignity and*

autonomy of man.” In that same judgment, Nariman J. observed that “... *the dignity of the individual encompasses the right of the individual to develop to the full extent of his potential. And this development can only be if an individual has autonomy over fundamental personal choices.*”, the impugned Act denies respect for personal identity, undermines autonomy over fundamental personal choices, and damages plurality and diversity. It stands, therefore, in stark violation over the universal and basic human right to dignity.

XII.

XIII. The Petitioner herein states that he has no other alternative, equally efficacious remedy except approach this Hon’ble Court by means of the present petition.

XIV. The Petitioner has for the first time filed this Petition in respect of the subject-matter, i.e., quashing of The Farmers' (Empowerment and Protection) Agreement of Price Assurance and Farm Services Act, 2020 as violative of Articles 14, 15 and 21 of the Constitution.

XV. The Petitioner herein submits that this Hon’ble Court has the requisite jurisdiction to entertain the present Writ Petition and adjudicate upon the issues arising there from.

XVI. That it is humbly submitted the present issue is a fit case to be entertained as public interest litigation as the persons directly affected by the operation of the impugned provisions of the Act are unlikely to directly approach this Hon'ble Court for due to the ongoing pandemic situation amongst other things.

XVII. That the Petitioner has no personal interest in this matter except championing the case of the poor farmer.

XVIII. Any other ground that may be raised with the permission of this Hon'ble Court.

14. PRAYER:

On the aforesaid submissions, it is most respectfully prayed that this Hon'ble Court may graciously be pleased to:

- a). To issue a Writ of Mandamus or any other suitable Writ, Order or Direction declaring Section(s) 2, 3, 4, 5, 6, 7, 13, 14, 18 and 19 of The Farmers (Empowerment and Protection) Agreement on Price Assurance and Farm Services Act, 2020 as being unconstitutional, illegal and void, and/ or;
- b). To issue a Writ of Mandamus or any other suitable Writ, Order or Direction in the nature of Mandamus declaring The Farmers (Empowerment and Protection) Agreement on Price Assurance and Farm

Services Act, 2020 as being unconstitutional, illegal and void, and/ or

- c) To issue a writ of Mandamus or any other suitable writ, order or direction for Establishment of Farmer's Tribunal analogous to Section 7 of Industrial Dispute Act, 1947 and Section 9 (Chapter 3) The Consumer Protection Act, 1986.
- c). Pass such further and other order(s) may be deemed just, fit and proper in the facts & circumstances of this case.

AND FOR THIS ACT OF KINDNESS THE PETITIONER AS IN DUTY BOUND SHALL EVER PRAY.

Drawn by

Settled & Filed by

Aashish George,
Advocates
Drawn on: 23/09/2020

JAMES P. THOMAS
AOR For the Petitioner,

Filed on: 24/09/2020