

From Constitutional Safeguard to Political Instrument? A Critical Study of Article 356 of the Indian Constitution

Ankita Sanganeria

Faculty, Madhusudhan Law University, Cuttack, Odisha

Email: ankitasanganeria47@gmail.com

Abstract

Article 356 of the Indian Constitution, situated within Part XVIII dealing with Emergency Provisions, empowers the Union Government to impose President's Rule in a State upon the "failure of constitutional machinery." Conceived as an exceptional constitutional safeguard to preserve democratic governance and national integrity, this provision has, over time, generated intense debate regarding its scope, application, and potential for misuse. This study critically examines the transformation of Article 356 from a protective constitutional mechanism into, at times, a political instrument. It analyses the constitutional framework, the intent of the framers, and the safeguards introduced through parliamentary control and constitutional amendments. The research further evaluates the recommendations of the Sarkaria and Punchhi Commissions, which emphasized restraint, objectivity, and last-resort invocation. Judicial interpretation particularly in *S. R. Bommai vs Union of India* (1994) is examined as a turning point that subjected presidential proclamations to judicial review and strengthened federal principles. The paper also explores historical misuse, structural vulnerabilities, and the continuing tension between federal autonomy and central authority. It concludes that while Article 356 remains constitutionally necessary, its legitimacy depends upon disciplined application, judicial vigilance, and adherence to cooperative federalism.

Keywords: Article 356, President's Rule, Federalism, Constitutional Breakdown, Judicial Review

Introduction

Article 356 of the Indian Constitution is one of the most debated and important provisions under Part XVIII (Emergency Provisions) of the Indian Constitution, as it allows the Union Government to intervene in the governance of a state in case of 'failure of constitutional machinery' in that state. Constitutionally, there is a provision in Article 356 that if the President is satisfied that the government of a state cannot be carried on "in accordance with the provisions of this Constitution", he will assume to himself the functions of the State Government and dissolve or suspend the State Legislature (Constitution of India, art. 356). The language of Article 356 is deliberately broad and capacious so that it becomes possible for the Centre to take over State administration on varying grounds, sometimes going beyond actual constitutional breakdowns to political instability (Tiwari, 2022, p. 15). Although the Founding Fathers, including Dr B. R. Ambedkar, had a vision that Article 356 was rare and exceptional, the fact is that the reason for its inclusion in the Constitution was that it was intended to ensure the unity, integrity and constitutional governance of India, especially during the puppy years of independence when the stability of the country was of pivotal importance (Constituent Assembly Debates as cited in *Bommai vs Union of India*, 1994; Mishra, 2021, p. 4).

Constitutional Commissions and Legal Safeguards under Article 356

Article 356 of the Indian Constitution contains special powers of the Union Government to direct the administrative machinery of a state in case of breakdown of natural constitutional machinery, thus making it possible for the Union Government to intervene in the governance of a state of the Union after the breakdown of the constitutional machinery. However, due to the use of this provision since inception for carrying out political goals, constitutional scholars and policymakers have underlined the importance of safeguards to curtail the power of the Centre and ensure the safeguarding of the balance between federalism and the Centre. Two major constitutional commissions, namely, the Sarkaria Commission (1983-1988) and the Punchhi Commission (2007-2010), have discussed this provision in detail and have made recommendations for reforming this article with the aim of ensuring its enforcement as a last resort. These recommendations are now at the heart of academic debate on how far the Centre should go in using this emergency power.

The Sarkaria Commission, constituted in June 1983 to examine the Centre-State relations, gave a lot of attention to the provisions concerning emergency measures, including Article 356. The Commission recognised that Article 356 was originally intended as a measure to provide against exceptional situations where the state governments are unable to function according to constitutional norms, although it noted that the language in the provision was broad enough, and in particular the phrase "failure of constitutional machinery" was vague and open to political abuse (Chouhan, 2018, p. 692; Sarkaria Commission Report, 1988). To overcome this, the recommendation given by the Commission was that Article 356 procedures should be followed only in extreme cases where all options to overcome the crisis have been exhausted; that includes trying to resolve the crisis at the level of the State (Legal Service India, 2026, p. 1; see also, Sarkaria Commission, 1988). One major recommendation was that clear warnings be given to the state government before invoking, as well as that the governor's report motivating the invocation should be a "speaking document, containing objective and verifiable grounds of the perceived failure of the constitutional machinery" (Nanda, 2018, p. 1469; Sarkaria Commission Report, 1988). The Sarkaria Commission also stressed that disarray of the State Assembly should be avoided if possible and all other constitutional remedies, such as approaching an alternative interval and forming the government, should be pursued first (Chouhan, 2018, p. 694).

Building upon the Sarkaria model, the Punchhi Commission was established in 2007, chaired by former Chief Justice of India Madan Mohan Punchhi, to conduct a more contemporary review of Centre-State relations, focusing on the application of Article 356. The Punchhi Commission further reiterated that the Centre should exercise restraint and visibility in thinking about Presidential Rule and tarnished the invocation of emergency powers as a last measure only after exhausting all political and constitutional remedies within the State (Drishti IAS, 2025). Importantly, the Punchhi Commission recommended some amendments in both Articles 355 and 356 to check the potential misuse by the Centre (Ipleaders, 2020). Among its major recommendations was the idea of a localised emergency regime, whereby rather than President's Rule being brought in throughout a whole state, intervention by the Union would take place within specific districts or areas, within and around which constitutional machinery

had indeed broken down, allowing for the continuation of democratic rule in other unaffected areas (NextIAS, 2025). The Commission also supported that the governor's report should be detailed and factual with clear justifications for the proposed intervention, and the Centre must consult the State before initiating President's Rule (Testbook, 2026; Ipleaders, 2020). Such reforms, in the view of the Punchhi Commission, would strike a balance between the demands of constitutional order and respect for state autonomy and cooperative federalism.

Integrated Comparative Analysis of Emergency Powers in Federal Constitutions

In discussing the different ways in which federal systems balance state autonomy and central intervention in situations of constitutional breakdown, a comparative angle helps highlight the peculiar position of India's Article 356 and possible lessons from other federations. In the Indian context, it is the powers granted by Article 356 of the Indian constitution that allows powers to the Union government to impose President's Rule in case of failure of the Constitutional machinery of a state, which is an explicit Constitutional mechanism to deal with an emergency situation and is incorporated in Part Eighteen of the constitution.

Comparative research makes us aware of how other federations deal with emergencies and keep federations intact while engaging in restraint of the authority of the centre. In Canada, the Emergencies Act (1988) has a secular plan for come in federal intervention which emphasizes proportionate degree and consult provincial governance, so acknowledges more syndication between the federal requirement and provincial self-governance than the constitutional mechanism established in India (Bhattacharjee, 2024). This is in contrast to India's constitutionalised and wide dispersal emergency power which, though aimed at the stability of the nation, has the risk of a higher level of political misuse and federal tension associated with it. Similarly, in other model federations like the United States and Germany, the emergency powers are either implicit or very limited; the emergency powers in the United States system are largely based on the statutory provisions and/or historical interpretations by the Supreme Court, rather than specific text emergency powers in the Constitution, which maintain the autonomy of the states even in times of crisis (Pandey & Pandey, 2026). Germany, from its constitutional experience after the Weimar experience incorporates emergency requirements which emphasise mechanisms of protectoral constitutional democracy and strong judicial control, which is limiting in the case of long-term potential centralisation (Pandey & Pandey, 2026).

The comparative evidence thus shows that although emergency mechanisms can be found in most federal constitutions, there is great variance in how they are designed and organised, what scope they have, and what safeguards there are to limit them from being abused. India's embedded Constitutional provision under Article 356 is on one end of the spectrum - clear and broad, but open to central overreach without adequate guardrails, which leads to federal tensions and normative critique (Lumina, 2024).

Judicial Interpretation

The judicial construction of Article 356 has been a very crucial piece in terms of determining the extent to which the power of the Centre can go in a matter of the imposition of President's Rule in a state. Over the years, the Supreme Court of India has developed jurisprudence that

limits arbitrary central intervention, enhances federalism and upholds constitutional democracy. The most celebrated decision in this respect is the S.R. Bommai vs Union of India case of 1994, where the Supreme Court curbed significantly the unchecked invocation of Article 356 by holding that the power exercised under Article 356 is subject to judicial review and that it will be exercised only in circumstances of a genuine breakdown of the constitution (Dubey, 2018, pp. 3-4; Singh, 2026, pp. 1916-1918). Prior to this, previous modes of judicial interpretation have either abstained from adjudicating upon the president's satisfaction or interpreted Article 356 in its restricted sense, resulting in divergent results.

In the case of S. R. Bommai vs Union of India (1994), a nine-judge bench of the Supreme Court considered the constitutionality of a number of Presidential Proclamations of the years 1989-92 under Article 356. The most important questions were whether the proclamation is justiciable, the scope of judicial review, and what constitutes a real "breakdown of constitutional machinery" (Bommai vs Union of India 1994; see also Legal Service India 2024). The position of the Court was that Article 356 is not immune from judicial review and that constitutional courts can review the issue of whether the President's satisfaction was based upon any relevant material, whether the material was relevant to the alleged breakdown, and if there was any mala fides or irrelevant consideration in arriving at the decision (Bommai vs Union of India, 1994; Delhi Law Academy, 2025). Specifically, the judgement explained that it should be the objective material which reasonably suggests failure in the constitution that should form the basis of the satisfaction of the President and not just subjective or political (Bommai vs Union of India, 1994; Legal Service India 2024). Importantly, the Court further emphasised that majority support within a State Assembly should be tested through a floor test before the President's Rule comes into the picture, and dissolution of the assemblies cannot come about by merely relying on the report of the Governor or even on a subjective conclusion without the approval of Parliament (Legal Service India, 2024; Bommai vs Union of India, 1994). These directives greatly restricted the practice that was once common with regard to imposing President's Rule without any meaningful evidence and testing conducted by democracy and thus strengthened the constitutional principles of federalism & governance on the principle of democracy. (Singh, 2026, p. 1920).

The Bommai judgement has also informed more recent judicial interventions which have further influenced the jurisprudence of Article 356. A notable example is the Supreme Court done in Uttarakhand and Arunachal Pradesh in the year 2016 concerning the validity of President's Rule Proclamations without legitimate constitutional grounds. In the case of Arunachal Pradesh, the roots of political instability caused the imposition of President's Rule, but later the Supreme Court invalidated the proclamation and held that Article 356 cannot be used as a vehicle of political engineering and to destroy the will of the elected majority. This reaffirmed the principle of Bommai that the judiciary would have to ensure that Presidential Rule is not used as a cover to serve partisan ends but truly only to address the constitutional collapse. (Dubey, 2018, pp. 6-7; Singh, 2026, p. 1918)

Recent Developments in Article 356 (President's Rule) in India

In recent years, Article 356 of the Indian Constitution, which provides for the President to take control of a state where constitutional machinery has broken down, has received significant

and very contemporary developments in terms of the challenges specific to governance as well as the constitutional issues. One of the most noteworthy has been its application in the State of Manipur in the years 2025-2026 after long-term political instability and ethnic unrest. On 13 February 2025 it was subjected to President's Rule, when the then Chief Minister N. Biren Singh resigned, and no viable alternative to the government could be formed in the face of increasing news of violence between ethnic groups and a crumbling administration. The Union Government, invoking Article 356, took over the State's executive and legislative power to stabilise the law and order and make administrative functions.

This invocation was historic not only in terms of its causes but also in terms of the duration and treatment in parliament. After its first imposition, the Centre moved a resolution in Parliament to get an extension of President's rule beyond the original duration of six months. In July-August 2025, both the Lok Sabha and Rajya Sabha passed a resolution extending six months, so the President's Rule would continue from 13 August 2025 to 13 February 2026 even though there was an intense political discussion and uproar from the Opposition in the Upper House (Rajya Sabha). This extension took the form of a constitutional obligation and had the support of the government on the grounds that the administrative breakdown and ethnic violence continued to make the restoration of democratic governance difficult.

Article 356 in Manipur is also capturing wider attention for the implications for federal governance and democratic representation. Analysts have observed that extended central administration delays the suspension of the State Assembly, both in its functions and legislative autonomy, raising questions over the threshold for implementing and extending President's Rule under the Indian Constitution. Moreover, the throes of the fierce ethnic conflict and the administrative collapse in the state have presented a picture of the complexity of the application of Article 356 in a scenario in which issues of security, human displacement and social fracturing are coupled with issues of constitutional governance.

Misuse and Criticisms of Article 356

Political Opportunism and Its Impact on Federalism

One of the more constant criticisms levelled at Article 356 is that it has often been evoked for political expediency rather than actual constitutional necessity. Article 356 gives the Union the right to enforce President's Rule in a state government that cannot function properly as per the Constitution of India (Constitution of India, art. 356). However, as the scholars point out, "failure of constitutional machinery" has been exploited in so many ways to justify the dismissals that they were often based not on the breakdowns in governance, but on political calculations (Rai, 2024, p. 737). Ayushi Rai's in-depth research on misuse of Article 356 notes that power granted to the Union by Article 356 has given the Centre immense power in the governance of a state, and this created the opportunity to topple elected state governments if they were governed by rival political parties (Rai, 2024, p. 738). This pattern has been especially prominent in the political history of India, where successive central governments have employed the power to exercise the provision to not only assert control during actual times of crisis but also to suppress state autonomy for partisan gain (Anil Kumar, 2025, p. 423). Anil Kumar's audit of federalism suggests that rather than functioning as a constitutional

guarantor, sometimes Article 356 has functioned as a tool of political oppression against the state administrations led by opposition parties to effectively subvert the achieved balance between the centre and the states, the very idea of federalism as outlined in the Constitution (Dwivedi, 2025, p. 2191). As a result, what had been meant to be an emergency provision has brought to light, more often than not, a central overview process to be astutely used by a patriarchal opposition force that has spurred into question democratic pluralism vis-a-vis the Indian polity.

Historical Patterns of Misuse and Commission Findings

Historical facts surrounding the use of Article 356 support the view that political considerations have affected the invocation of Article 356 more than any real, constitutional emergencies. Academic audits reveal that the provision was invoked many times in the decades after independence, particularly during times of political rot in the 1970s and 1980s, in which the central government would set aside elected state governments by invoking the provision of constitutional failure. In some of these cases, the broad definition of what a ‘constitutional breakdown’ was took the Centre to intervene even when there was an opportunity to resolve the crisis without dissolving the state legislature through established political processes (Anil Kumar, 2025, p. 425). This opportunistic usage led the constitutional commissions, such as the Sarkaria Commission and the Punchhi Commission, to explicitly suggest that Article 356 be used only as a ‘last resort’, when all political remedial measures have been exhausted (Chouhan, 2018, p. 694). These commissions highlighted the disregard for cooperative federalism and political considerations which have warped the application of Article 356 on the basis of historical evidence and diminished state institutions and democratic norms. (Anil Kumar, 2025, p. 427). This suggests that the fundamental structure of Article 356, with its lack of clear criteria for a constitutional breakdown, places systemic vulnerabilities which go beyond a single political leadership. This rate of interventions before judicial reforms illustrates how political incentives rather than constitutional imperatives were driving central behaviour, thus providing evidence for long-held fears among others who write on federalism that Article 356 may turn into a tool of centralisation rather than a safeguard against any real emergencies (Rai, 2024, p. 741).

Institutional and Structural Critiques

Beyond the political misuse, critiques of Article 356 in institutional terms are focused on structural flaws that make the provision prone to abuse. A major issue of study among scholars is the position of the governor, whose reports frequently lead to a president's proclamation of rule. The Constitution provides the President the right to take actions ‘on receipt of a report from the Governor or otherwise’ (Constitution of India, art. 356). Critics note that this provision grants too much discretionary power to governors, and they are the appointees of the Centre and, as a result, can perform the roles of political agents rather than being neutral representatives of the constitution (Dwivedi, 2025, p. 2193; Rai, 2024, p. 740). Shivanshu Dwivedi, in a more elaborated way, states that Article 356 has been used time and again to ‘subvert the federal spirit’, particularly because there are no objective benchmarks to assess how the governance by the state constitutes a constitutional failure (Dwivedi, 2025, p. 2192).

Reconciling Federalism and Constitutional Emergencies

The Need for Strong Judicial Oversight

The exercise of the central power under Article 356 offers a permanent tension between the responsibilities of the Centre to protect the constitutional governance and the autonomy of the States in the Indian federal set-up. Given this delicate balance, scholars and legal commentators have emphasised the importance of judicial oversight in preventing any arbitrary or politically motivated imposition of President's Rule. Although Article 356 was meant to be a mechanism that protects against constitutional breakdown, their vague words, in particular the undefined word 'failure of constitutional machinery', leave room for its discretionary misuse (Sathya Narayanaswamy & Chandralekha, 2025, p. 1). The decision of the Supreme Court in *S. R. Bommai vs Union of India* (1994) was thus said to be revolutionary in that it has established that the satisfaction of the president under Article 356 is subject to judicial review and it should be based on objective material and not political convenience (ApniLaw, 2025). This judicial check has been a cornerstone in protecting the federalism principle, because it allows the courts to investigate the motivation and evidence for a proclamation of President's Rule.

Combining Preventive Mechanisms

Judicial check alone, though important, is not enough to check the misuse of Article 356. A comprehensive framework requires preventative mechanisms, both institutional and procedural, which take place before any central intervention takes place. Constitutional commissions like the Sarkaria Commission (1988) and the Punchhi Commission (2010) have long been pushing for some form of structured preventive safeguards to decrease the chances of arbitrary use of President's Rule. For example, the Sarkaria Commission had recommended that Article 356 should be invoked only after all political remedies, such as inviting alternative government formations/exploring the option of coalition governments, etc., are exhausted, and the governor's report should be a 'speaking document' based on objective and not subjective evidence. Such procedural rigour helps to ensure that the trigger for central intervention is well-documented and justified, and hence not arbitrary.

Another important preventive mechanism is the conduct of a floor test in the State Legislative Assembly before dismissal of a government. This is a practice that was ordained by the Supreme Court in the *Bommai* judgement and forces the Centre to seek a democratic validation of support of the majority, rather than considering only such assertions of the governors or any political narrative. Floor tests serve as a rough form of preliminary democracy check, which often clarifies whether a government has lost its majority without having to dissolve the state legislature prematurely.

Political remedies complement the judicial and procedural safeguards. Strengthening of cooperative federalism through political conventions, regular consultations between the Centre and States and respect for electoral mandates can reduce the number of crises that have the potential to become constitutional breakdowns. Measures such as pre-decision consultation with the state governments before making recommendations to President's Rule can promote trust and transparency in the inter-governmental relationships. Furthermore, legislative efforts to progressively deconstruct the criteria for triggering Article 356 (for instance, through

guidelines adopted by Parliament and/or statutory definitions) could offer additional preventative guardrails to render the invocation of President's Rule more consistent and transparent.

Balancing Theory and Practical Realities

Reconciling federalism with emergency powers requires some understanding, both of constitutional theory and of practical political reality. In theory, federalism entails a distribution of power where the Centre and States function independently in their respective spheres, and neither of these should prevail over the other (Rathor, 2025, pp. 1-2). Article 356 disrupts this balance by allowing central intervention in the nature of governance in a state. Critics of this provision hold that frequent and/or arbitrary use of this provision gives rise to coercive federalism, in which the Centre asserts its dominance, thereby compromising the spirit of democratic pluralism (Rathor, 2025, pp. 1-2). According to Manpreet Rathor, although the framers anticipated the necessity for the emergency provisions, they also perceived the need for the restraints on the central power to ensure the protection of the federal structure. The lack of clarity at the legislation level and the use of open-ended discretionary words have brought about interpretational challenges that endanger this ideal.

Encouragingly, judicial interventions and preventative mechanisms have already helped establish a system in which Article 356 is invoked less on a more regular basis than earlier in the decades in which we have witnessed the shift (from less than a decade to more than a decade), so we can already see constitutional mechanisms being modified in line with changing political realities. However, constant vigilance is needed to ensure that the emergency powers are not abused in order to settle some political scores or to discard state autonomy.

Conclusion

Article 356 was designed as a constitutional safeguard, an emergency valve that represented a safeguard for the democratic and constitutional order of the States when the management of the country had collapsed beyond repair. The framers of the Constitution did not intend it to be a regular administrative device or a means for correcting political instability. Rather, it was intended to cover extraordinary circumstances in which the state government was apparently unable to function according to constitutional principles. However, history does show that provision has frequently moved away from this limited objective. Over several decades, Article 356, on the other hand, has been used at times as less of a shield of constitutional order and more of a sword for political contests between the Centre and the States.

The broad and undefined phrase "failure of constitutional machinery" provided scope for interpretative flexibility, which successive central governments have used in an expansive manner. In many cases, elected state governments were put down not because of actual constitutional breakdown but as a result of changing political alignments or loss of political support, which could have been sorted out through democratic procedures such as floor tests. This pattern played a part in the perception that Article 356 was transformed from a constitutional safety into a political tool that could be used to undermine federal autonomy.

Judicial intervention, especially after *S. R. Bommai vs Union of India* (1994), became a turning

point. The Supreme Court's affirmation of judicial review of presidential proclamations, insistence on objectivity of material, and requirement of floor tests greatly limited arbitrary usage. The judgement balanced the Constitution by reaffirming the role of federalism and democracy in the basic structure of the Constitution. As a result, frequency of misuse has gone down, and central intervention nowadays is subject to more constitutional scrutiny.

Yet, there are still structural issues. The discretionary nature of the governors and the lack of clarity in the statutes as to what constitutes a constitutional breakdown, not to mention Centre-State relations which are inherently political in nature, place the potential for misusing the means always at the doorstep. The tension between the integrity of the nation and the autonomy of the states still characterises debates over Article 356.

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