

**LIVELIHOOD INSECURITY AMONG AGRICULTURAL LABOURERS IN
TAMIL NADU - A SOCIO-ECONOMIC LEGAL PERSPECTIVESⁱ
“AGRICULTURALIST AVOIDING FARMING MAKES
EVEN SAGES SUFFER”ⁱⁱ**

Dr. R. Elumalai, B A., M.L., Ph.D.,
Assistant Professor, Government Law College, Chengalpattu
S. Azhagumalar, LL M,
Advocate, Chengalpattu

Abstract

Agricultural laborers are one of the most socially marginalized and economically vulnerable groups in Tamil Nadu, despite the state not being as underdeveloped as the rest of the country, in terms of industrial and economic development. The objective of this study is to analyse the socio-economic conditions and livelihood insecurities of agricultural labourers and examine the issues of agricultural labourers' definition, income instability, employment insecurity, caste inequalities, gender inequalities, and rural economy structural changes. Using the 2011 Census data and National Sample Survey data, it is shown that agricultural labourers are more in number than cultivators, indicating a high degree of landlessness and wage dependence in Tamil Nadu's skewed agrarian structure. It also shows that urbanization, along with modernization and climate change, has made the situation worse through labor scarcity and greater employment insecurity. Although there are a few welfare measures such as the Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA) and now VB G-RAM Act, they do very little due to their limited scope and various implementation issues, to provide the rural population with sustainable livelihoods. The paper also argues that the socio-economic deprivation of agricultural labourers is primarily a caste and gender issue in addition to being an economic issue. It thus suggests that the livelihood insecurity of agricultural labourers in Tamil Nadu can be mitigated through sustainable rural development efforts that provide a comprehensive and multi-sectoral approach to rural development, including wage reform, social security, skill development, and stronger rural institutions.

Keywords: Agricultural labourers, socio-economic conditions, income instability, seasonal employment, livelihood insecurities.

1. Introduction

Traditionally, agriculture has formed the backbone of rural communities in India, especially in Tamil Nadu, where a significant portion of the population relies on it. Agricultural labourers, however, occupy the most precarious position in the agricultural hierarchy. They are landless,

economically dependent on a wage which they have to fight for, and socially excluded. Unlike cultivators, who have control over land, agricultural labourers have to depend on wage employment, which is unstable and seasonal. Their socioeconomic conditions are determined by systemic inequalities, the market, and the policies of the government. Agriculture is one of the most important sectors in the Indian Economy, attracting a large proportion of the population. According to the Census of India 2011, nearly 263 million individuals were engaged in agricultural activities, and a considerable proportion of the workers are agricultural labourers. In Tamil Nadu, the agrarian economy has undergone significant transformation due to industrialization and urban expansion, yet these changes have not uniformly benefited agricultural labourers. Instead, they have worsened vulnerabilities by reducing employment opportunities in agriculture without adequately providing alternative sources of livelihood. This paper seeks to critically examine these dynamics in several legislations and provide an in-depth understanding of the conditions faced by agricultural labourers in the state.ⁱⁱⁱ

2. Definition of Agricultural Labourers

There are different definitions given to the agriculture labourer based on the customary practices of the people without any statutory definitions. The Agricultural Labour Enquiry Committee Report (1950 – 51) first steps was taken^{iv} to define agricultural labour as “All those who are engaged as hired labourers in agricultural operations for 50% or more of the total number of days worked by them during the previous year.” The Committee’s definition based on the nature of employment and its quantum. The Second Agricultural Labour Enquiry Committee Report (1956 – 57)^v adopting income as the basis, defined agricultural labourer as a person, if his or her major source of income during the previous year was agricultural wage. These two Committees broadly recognised an agriculture labourer as an individual employed on a wage basis, receiving remuneration either in cash or in kind. They also adopted a comprehensive understanding of agricultural operations, covering activities such as land preparation, sowing, cultivation, and harvesting. In addition, work connected with horticulture, dairy farming, animal husbandry, poultry rearing, and beekeeping was included within the scope of agricultural employment. Ancillary tasks related to farming, including the transportation and marketing of agricultural produce, were likewise regarded as part of agricultural operations.^{vi}

The National Labour Commission has categorised agricultural labourers into three broad groups based on their relationship with land ownership and employment. The first category comprises landless labourers, who do not possess any agricultural land and depend entirely on

wage employment for their livelihood. The second category includes marginal labourers. Marginal labourers farm on small holdings that generally do not sustain them and as a result they work as wage labourers on other farms. The third category consists of attached or bonded labourers, who remain tied to a particular employer through long-term arrangements that may limit their freedom and often result in exploitative working conditions. Accordingly, an agricultural worker is one who is practically unskilled and unorganised and has no land other than personal labour for their livelihood.^{vii}

However, the most satisfactory definition appears to be given by the Committee on Labour Welfare (1969),^{viii} which defined agricultural labour as “One whose principal means of livelihood is wage income arising out of farm labour and other allied activities”.

The Census of India, 1961 states that an agricultural labourer was defined as “one who worked for others in agricultural activities and received payment in cash or kind or both for his services.”^{ix} The most precise statutory definition given by the state legislation in 2006 which defines “any person in the age group of 18 to 65 years, engaged to work in agricultural or allied agricultural operations for wages but who does not own any land” as agricultural labourers.^x

On the same sense, *Sahoo Bala Jambhalee vs Narayanshastri*,^{xi} the court dealt with and has given the generous interpretation to the term of “**agriculturist**” under Section 2(2) of the Deccan Agriculturists’ Relief Act, 1879. The plaintiff, a Maratha widow, had instituted a suit under the Act, but both the trial court and the appellate court dismissed her claim on the ground that the state did not qualify as an agriculturist within the meaning of the statute. Aggrieved by these findings, she approached the Bombay High Court through a revision application. The facts revealed that after becoming a widow at a young age, the plaintiff returned to her parental village and regularly assisted her brothers in cultivating their agricultural lands. She also possessed small plots of land of her own and personally participated in their cultivation, mainly undertaking activities such as weeding and supervision. As well as farming, she made money by selling milk from her own cows and from milk she bought from others. Selling milk earned her more money than her farming did. Because of this, the lower courts determined farming was not her main source of income. They determined her farming activities were not significant enough to classify her as someone who worked in farming. The main legal question for the High Court was whether someone who usually works in farming can be classified as an agricultural worker and an agriculturist if a large part of her income comes from a non-farming activities. Justice Madgavkar found that the plaintiffs’ daily routine demonstrated consistent

involvement in agricultural operations. Although she spent part of the day selling milk in the nearby town, she regularly returned to engage in cultivation in her own lands and those of her brothers. The court held that the number of hours devoted to agricultural labour was not decisive. What mattered was the habitual and continuous of her participation in farming activities. Therefore, the fact that her income from milk sales exceeded her agricultural earnings did not deprive her of her status as an “agriculturist”. Therefore, as per s.2 (2) of the Deccan Agriculturists Relief Act, 1879, that the appellant is an agriculture labour and has come within the meaning of that definition. Even, when non-agricultural income exceeds agricultural income, provided that the individual regularly and habitually performs agricultural labour. The legislature did not intend to exclude agricultural workers merely because they supplemented through ancillary occupations such as milk selling.

These dynamic steps have been taken to consider all kinds of agricultural activities now came under the definition of agriculture labour and the law enforcement agencies such as agricultural department and court from time to time has considered the above said definitions and legislations also incorporated that definition and their allied activities within the definition of agriculture labour.

3. Socio-Economic Structure of agricultural Labourers

The socio-economic structure of agricultural labourers in Tamil Nadu is fundamentally defined by landlessness and dependence on wage labour. According to the Census of 2011,^{xii} the state recorded approximately 144.3 million agricultural labourers, significantly higher than the number of 118.8 million cultivators, indicating a disproportionate distribution of land and resources. This is a huge problem for the economy and people and they are mostly poor people they belong to SC, BC, etc. The caste system restricts them even more so they can not do anything except for farming. Incomes of agricultural laborers are still very low and unstable. Like salary-based jobs, agricultural wages depend on the season, labor supply and demand, and how weak the laborers are. The government data says that the average income of farmer's families in Tamil Nadu is not much, and they earn most of it by working as laborers. This shows that even farmer's house hold are becoming laborer and this is happening in rural area. Agricultural workers mostly are unskilled workers and they live in small and remote villages, they are old and they keep on doing old farming and wages. Most labourers are conservative and strongly influenced by tradition, often accepting their difficult living conditions as a matter of fate. They usually work under the direct control of landowners, with little freedom or relief from hard labour. As there are very few alternative job opportunities, they are required to

perform all kinds of work, including both farm and household tasks, as instructed by the landlord.

Recent employment trends indicate a growing dependence on agriculture as a source of livelihood in India. According to the Economic Survey 2024 – 2025,^{xiii} the proportion of the workforce engaged in the agricultural sector increased from 44.15% in 2017-2018 to 46.1% in 2023-2024. This development contrasts with the expectation that economic growth would gradually shift workers towards manufacturing and service industries. The rise in agricultural employment, coupled with a decline in opportunities in non-agricultural sectors, suggests that sufficient jobs are not being created outside agriculture. Consequently, many workers are compelled to return to or remain in agricultural occupations, where employment is often characterised by low wages, seasonal uncertainty, and limited social security.

Agriculture need a lot of experience and knowledge for the workers to do other things like plowing, planting, transplanting, irrigating, harvesting, and post harvesting. Despite having such specialized skills from experience, agricultural workers are considered unskilled workers because of the informal nature of agriculture and not being recognized as experts. This classification effects their wages, jobs and labor welfare benefits. The increase in mechanization of agriculture has further changed the nature of agricultural work. farming today involve tctors, tractors, power tillers, harvesters, threshers, and other farming equipment to increase productivity and decrease labor. However, many agriculture workers do not know how to use this machine correctly. The lack of training programs makes workers prone to mistakes and accidents at work.^{xiv}

Landlessness is one of the major reasons for the economy of agricultural labours in India. Survey findings have always showed that most of the rural housewives have little or no land to farm. Out of the houses that relies on labor, most of the houses have no land to work on. The lack of land ownership means that workers have no other source of income but to work for money. Like land lords, they can't grow food for their family and they can't get any loan from the government because they don't have land to use as collateral. They can't have any productive assets that can Consequently, landless labourers are very poor and very sensitive to economic shocks. The growth of landlessness in rural India can be attributed to several interconnected factors. Continuous population growth has put pressure on the little arable land that we have, which has caused the land to be divided into pieces that are not economically viable. In addition, crop failures, indebtedness, and recurring financial hardships often force small and marginal farmers to dispose of their land. once they lose their properties they have

to go to agricultural market to work. The shortage of jobs in the non-farm sector in rural areas is a problem that makes the situation worse for the displaced farmers. Consequently, the number of landless agricultural laborers keeps on increasing, deepening the poverty and insecurity in the countryside.^{xv}

4. Employment Patterns and Livelihood Vulnerability

Agricultural labourers have a tough time when it comes to finding work. Their jobs are not regular. They have to work according to the seasons. This means they have a lot of work to do during times of the year like when the crops are planted and harvested. Then they have long periods where they do not have much work to do. This makes it hard for agricultural labourers to get an income. They struggle to make ends meet and have a life. When there is not work to do many agricultural labourers have to go to cities to find other jobs. These jobs are usually not very good. They do not pay much. Agricultural labourers are different from workers in factories. They do not have unions to represent them and look out for their interests. This makes it hard for them to come together and fight for their rights. It is not like workers in factories who have unions and can work together to get what they want. A time ago in 1956 and 1957 agricultural labourers got most of their money from wages. They got paid in ways. Sometimes they got cash and sometimes they got things like food. About half of their wages were paid in cash. About 40 percent were paid in kind. The rest was a mix of both. Agricultural labourers got 49 percent of their wages in cash and 40 percent in kind and the rest, in a mixed form.

Occupational health and safety hazards are one of the many difficulties facing agricultural workers. In the course of their duties the agricultural laborers are often subjected to dangerous chemicals and fertilizers; pesticides and other agrochemicals. In most cases, these actions are taken without using appropriate safety gear like gloves, masks, boots or protective clothes. The long term effects of working with these dangers could possibly cause health problems such as skin diseases and respiratory problems and many other diseases that can occur long term. Compared to laborers in the organized industries the agricultural laborers are often given no or very little training, and are never provided with appropriate protection by their employers. In most cases the job requires very high labor intensive and severe physical movements like prolonged bending, repetition and carrying heavy loads. This causes musculoskeletal problems like chronic back pain, joint pain and physical exhaustion. The environment has potential dangers in the form of venomous snakes, insects, and other animals commonly found in farms, which can be a cause of concern to their health and safety.

Furthermore, the increasing mechanisation of agriculture has introduced new occupational risks. Many agricultural labourers, particularly those with limited technical knowledge or training, are required to operate modern farm machinery such as tractors, threshers, harvesters, ploughs, and shredders. Lack of adequate training in the operation of such equipment often results in workplace accidents, causing severe injuries, permanent disabilities, and in some cases, loss of limbs. Consequently, the absence of comprehensive occupational safety measures continues to place agricultural labourers among the most vulnerable categories of workers in the rural economy. Unlike the industrial sector, where employers are generally required to provide safety instruction and skill development programmes and may face penalties for non-compliance, the agricultural labourers often receive little or no training before being assigned to operate machinery, this deficiency not only increases the likelihood of accidents and injuries but also exposes workers to economic hardship, as many of them are unable to secure adequate compensation for employment-related injuries. The lack of formal skill recognition, training opportunities, and effective compensation mechanisms continues to undermine the welfare and occupational security of agricultural labourers.^{xvi}

A study conducted by the Tamil Nadu State Planning Commission in 2025^{xvii} submits a report highlighting a significant transformation in rural employment patterns across the state. The analysis shows that dependence on agriculture as the main source of employment has come down by about 20 per cent since 2012. Especially among 15 to 34 years of age, employment generation in the non-farm sector would replace agriculture as a preferred option due to assured salary and steady work and security of employment. The results show that a basic structural shift is in operation wherein employment opportunities from industries like manufacturing, services, construction and trade is likely to replace agriculture as main sector. These findings have been reported in a series of studies produced by the State Planning Commission and sent to the Government of Tamil Nadu in June 2025 showing that rural youth now have higher aspirations and require specific policy support for enhancing their skills, diversifying employment and developing rural economies and livelihoods in an environmentally sustainable manner. Transition out of agriculture represents the changing labor markets and highlights the importance of productive non-farm employment opportunities.^{xviii}

5. Social Dimensions: Caste and Gender Inequalities

Socio economic condition of Agricultural Labor cannot be examined apart from their socio-cultural background. Caste is still a key factor in determining occupations and socio-economic condition of rural Tamil Nadu. Among the agricultural laborer's majority belong to scheduled

caste, who has been subjected to various forms of social discrimination and economic exploitation for centuries in past. Scheduled castes were disproportionately distributed among agricultural wage laborers. Census 2011 Scheduled Caste primary Census Abstract data indicate that a high proportion of SC workers has been classified as agricultural labor rather than cultivating farmers, it is clear evidence of landlessness and continuing reliance on wage laboring. This structural discrimination is reflected in low wages, limited opportunities and restricted involvement in decision making. Caste system has persisted in veiled as well as in open forms of discrimination.^{xix}

Gender is the next most important issue of inequality in agricultural labour. Women form a large segment of the agricultural labour force; they are more exposed to the problem of wage inequality and poor employment conditions than men. Women constitute about half of the Agricultural labour force; however, their contribution often remains invisible within the institutional structures which identify the identity of farmers with the ownership of land. As compare to the male labourers, female labourer gets lower wages for the same work due to the existing gender stereotype. In addition, women face double burden of reproductive as well as reproductive labour as they are responsible for the household work along with work in the fields. Women account for almost 40-50 per cent of the total Agricultural labour force but their role is often ignored and under-valued. While they work for sowing, transplanting, weeding, harvesting, threshing, livestock production, and post-harvest processing, women seldom get recognition as individual farmers because the identity of the farmers is connected with ownership of land which is in majority of the hands of males. A major form of discrimination is seen in land ownership and access to resources. The Agricultural Census (2015-16) reported that women held less than 13% of operational agricultural holdings in Tamil Nadu. The absence land ownership restricts their access to institutional credit, crop insurance, subsidies, and agricultural extension services, thereby limiting their decision making power and economic independence. Wage inequality is another persistent issue. The women agricultural labourers are often paid 20-30% less than men for performing similar agricultural tasks. Despite undertaking labour-intensive work, women are frequently categorized as unskilled workers, resulting in lower remuneration and reduced bargaining power in rural labour markets. Thus, gender discrimination in Tamil Nadu agriculture is reflected through unequal land rights, wage disparities, exclusion from technology, and limited access to institutional support.^{xx}

Therefore, the court in *J.A. Chauhan v. State of Gujarat*,^{xxi} dealt with the above said issues. In this case, the petitioners were employed as Kendra Sanchalaks and Jilla Sanchalaks under the

Gujarat Rural Labour Welfare Board, an institution established to promote the welfare of rural and agricultural labourers in the State. Despite discharging regular duties on a full-time basis for several years, the employees were engaged on an honorarium basis and were not extended the benefits ordinarily available to regular government employees. Aggrieved by the disparity between the nature of their work and the remuneration received, they approached the court seeking regularisation of their services, payment of wages equivalent to the prescribed minimum wage, and other consequential service benefits. While examining the dispute, the Gujarat High Court took note of the Anomalous situation in which employees engaged in advancing the welfare of rural labourers were themselves deprived of adequate remuneration and employment security. The importance of equal wages and dignity of human labor as necessary concomitants to constitutional governance and welfare of labor was reiterated by the court. The issue travelled to the Supreme Court by way of Special Leave Petitions and raised general issues of regularisation, service benefits and rights of the persons working in the welfare institutions. This is one of the leading judgments in the field of labor jurisprudence as it reiterates the obligations of the state and state instrumentalities for maintenance of good and fair employment conditions. Though the petitioners did not themselves constitute as agricultural labourers yet the judgment goes a long way in the concept of social justice, dignity of labor and prevention of unjust labor conditions and this case is an authority as to welfare institutions cannot adopt and maintain any labor standards different from what they are mandated to enforce for the sake of welfare of labor.

6. Impact of Climate Change and Indebtedness

Climate, a key environmental factor, has become an increasingly important driver of livelihood insecurity for agricultural labourers. Tamil Nadu, in particular, is susceptible to climate variability such as droughts, floods and uneven distribution of rainfall that adversely affect agricultural production. Labor demand in agricultural production is closely linked with the agricultural cycle; thus, poor crop production inevitably leads to a decrease in employment for agricultural workers. While landowners might have access to credit and insurance systems, there is no social security net available to agricultural labourers, thus increasing their susceptibility to shocks. Due to the seasonal nature of agricultural labourers in rural India. Due to the seasonal nature of agriculture employment, labourers frequently experience periods of unemployment during which they have little or no income. Consequently, many households are compelled to borrow money to meet essential consumption requirements such as food, healthcare expenses, children's education, and social obligations including marriages and other

family ceremonies. In addition to meeting household needs, borrowings are often used to support agricultural activities. A significant proportion of rural credit is utilised for recurring farm-related expenditures such as the purchase of seed, fertilisers, payment of wages, and land rent. Some loans are also taken for long term investments in agricultural assets and equipment. However, for landless agricultural labourers, even the small amounts of debt can become difficult to repay because their earnings are generally low, uncertain, and dependent on the availability of work. Studies relied on rural indebtedness indicate that a substantial number of agricultural households remain burdened with outstanding loans. Whilst cultivators may have land or other productive assets from which they could potentially earn income, agricultural labourers typically have none of these. Hence, any repayment burden falls wholly on their wage earnings, which most of the time are far from enough for the daily expenses as well as any debt repayments. Access to institutional credit also often remains out of reach. Formal lending institutions such as commercial banks tend to prefer lending to persons who may be able to offer some form of security or collateral or who have a more reliable source of income. As the landless labourers do not normally possess this, they are in general often excluded from securing loans from these institutions. These labourers depend more on informal creditors and local money lenders to whom loans often charge very high rate of interest, combined with uncertain employment, making it difficult for them to pay back the loans. Many of these persons rely on informal creditors at high rate of interest in the absence of formal financial inclusion and are unable to pay off their debts, as significant portion of their earnings are utilised towards interest payment for loans, leaving little room for consumption and investment. Combined effect of lower earnings, higher expenditure and poor access to credit facilities exacerbate the vulnerability of agricultural labourers. More disturbing trend emerged from the recent data released on December 4, 2022 by NCRB, was that deaths of suicides among agricultural labourers were higher compared to farmers/cultivators. Total of 11,290 persons engaged in farming activities died, out of whom 6,11 females and 5,472 males, at least 53 percent (6,083) were agricultural labourers.^{xxii}

NSS 77th round revealed that half of agriculture households (50.2 percent) were indebted, and the average amount outstanding per indebted household was Rs. 74,121. For agricultural labourers, who generally had much lower earnings than landed farmers, the problem of indebtedness tended to be more acute, as income was predominantly obtained through seasonal work and the problem of loan repayment often took center stage. Data shows that private moneylenders constituted 14 percent and agricultural moneylenders constituted 6.5 percent of

total loans outstanding in case of farm households, borrowings which are typically at very high rates of interest, and that can lead to a higher payment obligation on these less privileged households. Consequently, agricultural labourers were often trapped in a vicious cycle of indebtedness and low, seasonal income that often prevented the liquidation of past loans. This contributes to sustained lack of economic security and indebtedness across generations.^{xxiii}

7. Role of State Interventions

While the government has introduced several measures, policies, and welfare schemes for agricultural labour, these have had limited impact. The Mahatma Gandhi National Rural Employment Guarantee Act, 2006 (MGNREGA)^{xxiv} is a noteworthy policy to ensure livelihood security as it guarantees 100 days of wage employment to every rural household. This program was a support system for rural households during the COVID-19 pandemic, when there was large-scale migration back to rural households, and this scheme has helped in stabilizing income levels and curbing distress migration to a certain extent. However, it is riddled with several problems like delayed payment of wages, poor execution and coverage. Social security schemes (pension schemes and health insurance schemes) do provide a minimal level of support, but administrative problems and unawareness restrict their reach. These limitations highlight the need for stronger institutional mechanisms and better governance to ensure the effective delivery of welfare measures. The MGNREGA in Tamilnadu for the financial year 2024 – 2025 is Rs.319/- for a person per day. This revised rate applies to unskilled manual workers, effective from April 1, 2024, representing an increase from the previous rate of Rs.294/- (2023 – 2024). Wages are based on an hour of a 7-hour workday (8 hours including 1 hour of rest).^{xxv}

In December 2025, the Mahatma Gandhi Rural Employment Guarantee Act (MGNREGA) was replaced by the **Viksit Bharat – Guarantee for Rozgar and Ajeevika Mission (Gramin) Act, (hereafter VB-G RAM G)**. The new legislation seeks to strengthen rural employment opportunities by expanding the guaranteed period of wage employment from 100 days to 125 days annually to every eligible rural household whose adult members are willing to engage in unskilled manual labour^{xxvi}. It can be observed as an extension of previous 100-day guarantee employment and strengthens the livelihood security of the rural laborers. To cope with seasonal requirement of agricultural laborers, the scheme includes 60 days of aggregate no-work period and, most importantly, concentrated in peak periods like sowing and harvesting season. Thus, the agricultural laborers can get 125 days employment security in the rest 305 days of the year and hence ensures balance between needs of laborers and the farmers. The Act further mandates

that wages must be paid on a weekly basis or, at the latest, within 15 days from the completion of the work performed, thereby ensuring timely compensation to workers. In addition to generating employment opportunities, the programme seeks to promote sustainable rural development by linking job creation with the construction of productive community assets. Its implementation is centred around four major areas of intervention: enhancing water security through water conservation projects, developing core rural infrastructure, creating infrastructure that supports livelihoods, and undertaking special projects aimed at reducing the adverse effects of extreme weather events. Alongside employment generation, the Act places greater emphasis on the creation of long-lasting rural assets, improvement of water resources, and the implementation of projects aimed at enhancing climate resilience in rural areas. In the legislation further provisions that use technology like digital monitoring and the attendance management system (using GPS) are introduced to increase transparency, accountability and efficiency in rural employment programs.

8. Judicial Responses

Although agricultural labourers are often part of the informal sector and lack direct legislative coverage compared to industrial workers, the judiciary especially the Supreme Court has played a crucial role in expanding their rights through progressive interpretations of fundamental rights under Arts. 14, 21, 23, 24 and Part III of the Constitution of India. In *Sanjit Roy vs. State of Rajasthan*,^{xxvii} where the Supreme Court reinforced that even in government employment schemes such as famine relief work, workers must be paid minimum wages. The Court ruled that payment below minimum wage violates Article 23 and cannot be justified even under economic distress conditions. The right to livelihood, which is central to the issue of agricultural labourers, was elaborated in *Olga Tellis vs. Bombay Municipal Corporation*.^{xxviii} Although the case dealt with pavement dwellers, the Supreme Court held that the right to livelihood is an integral part of the right to life under Article 21. This has a wider ramification to the agricultural workers. Here, livelihood security itself is considered a basic right. The judgment imposes an affirmative duty on the state to ensure that none of its policies causes an individual to be dispossessed of his livelihood. An important decision with respect to minimum wages and socio-economic justice is *Unichoyi vs. State of Kerala*^{xxix} where the validity of the minimum wages Act was sustained by the Court. It held that minimum wages are necessary to ensure that a worker gets a decent standard of living and not be exploited. The plight of rural labourers and the need for state intervention was also highlighted in *State of Gujarat v. Hon'ble High Court of Gujarat*,^{xxx} where the Court emphasized the importance of welfare measures for

unorganized workers. Although not exclusively about agricultural labourers, the case reinforced the need for judicial activism in protecting vulnerable labour groups.

In Tamil Nadu prominent, *State vs. Gopalakrishna Naidu & Ors (Kilvenmani Massacre Case)*^{xxx} sessions case arising out of Kilvenmani Massacre Case, subsequently considered by the Madras High Court in criminal proceedings. The Kilvenmani incident arose in the fertile Cauvery delta region of Thanjavur district during a period of intense agrarian tension. A majority of the agricultural labourers, belonging to scheduled caste, were dependent on large land-owners and decided to consolidate into agricultural labour unions to protest against low wages and for better working conditions. The landlord groups resented the rise in collective bargaining power of the laborers. The demonstration at Kilvenmani village on December 25, 1968, escalated into violence when forty-four persons comprising agricultural laborers and their family members including women and children were trapped inside a hut and set ablaze. Several accused landlords including those with political influence were prosecuted for this criminal offense. While there were conviction(s) in the trial court, the proceedings of the appellate court, in particular its appreciation of evidence, raised controversial legal issues on the burden of proof required in criminal law. Although it was a case primarily about criminal liability, the case has wider relevance as it highlighted the extreme social and economic fragility of the landless farm worker, and how disputes over wage hikes can culminate into violent conflicts when there are inadequate institutional safeguards for the poor. The tragedy drew national attention to the conditions of rural labour in Tamil Nadu and Contributed to public pressure for stronger wage regulation and labour welfare measures.

Therefore, in *V. Krishnaveni vs. State of Tamil Nadu*,^{xxxii} the court dealt with the dispute concerning the entitlement of an agricultural labourer or her dependents to receive welfare benefits available under the Tamil Nadu Agricultural Labourers-Framers (Social Security and Welfare) Act, 2006. The legislation was enacted to provide social security protection to landless agricultural labourers and small farmers who are particularly vulnerable to income instability arising from seasonal employment and agricultural uncertainty. The principle issue before the court concerned the interpretation of welfare provisions relating to financial assistance and compensation payable under the statutory scheme. The dispute required the court to determine whether the claimant satisfied the eligibility conditions prescribed by the Act and the welfare scheme framed under it. The court examined the object of the legislation, emphasizing that the Act is a beneficial social welfare measure intended to provide economic security to agricultural labourers and their families. In interpreting the scheme, the court

adopted the principle that welfare legislation should ordinarily receive a liberal construction so that the intended beneficiaries are not deprived of statutory assistance through excessively technical interpretations. The judgment reinforced the idea that social security measures for agricultural labourers from an important component of the State's constitutional obligation to promote social and economic justice. The wider implications of this case are that agricultural labourers are viewed as beneficiaries of a total welfare set-up and not just as employees being paid remuneration. The judgment marks the transition from modern labour protection to that of modern labour welfare jurisprudence when compensation, accident benefits, family aid and various welfare provisions come to be accepted as part of labor welfare.

9. The Constitution of India has Incorporated the Labour Welfare Doctrines

Although the constitution of India which is concerned with the important social welfare provision mentioned in Part IV has repeatedly accorded importance to labor welfare legislation through various cases since it came into effect. Its relevance and importance has been protected in its judgements over the period of time at national level, many doctrines for labor welfare has been introduced which is highlighted as well to till date, for instance, the Doctrine of Economic Compulsion as “**Forced Labour**”. It signifies the principle where agricultural labourers are required to work more than the specified work hour with less wages due to poverty or the want of other economic alternative, this doctrine is identified as a forced labor as per article 23 of the constitution and recognizes structural disadvantage that pervade rural labor markets. In Peoples' Union Democratic Rights vs. Union of India^{xxxiii} the apex court holds that labor taken due to poverty, hunger, destitution, even payment less than minimum wages is called as forced labor and here the force doesn't need to be physical force but it can be force by way of economic necessity. The Doctrine of State Responsibility for Rehabilitation mandates that the government must not only identify bonded agricultural labourers but also ensure their long-term rehabilitation through economic support, preventing re-entry into exploitative conditions (Article 23). In Bandhua Mukthi Morcha vs. Union of India, the court held that the state has a constitutional obligation under Articles 21, 23, 39, 41, and 42 to identify, release, and rehabilitate bonded labourers. Mere release is insufficient; rehabilitation is a continuing state duty.^{xxxiv} The Doctrine of Minimum Wage as a Fundamental Right elevates the payment of minimum wages from a statutory obligation to a constitutional guarantee, ensuring that agricultural labourers receive at least a subsistence level income (Article 23). In People's Union for Democratic Rights vs. Union of India, payment of wages below the statutory minimum wage was held to violate Article 23. Consequently, receiving at least the minimum wage was recognised as part

of the constitutional guarantee against forced labour. The Doctrine of Livelihood under Article 21 recognizes that the right to life includes the right to livelihood, thereby obligating the state to create conditions for secure and sustainable employment for agricultural labourers. The Doctrine of Right to Food and Survival ensures that agricultural labourers, who are often food insecure despite working in food production, are protected through state welfare measures (Olga Tellis Vs Bombay Municipal Corporation). The Doctrine of Social Justice in Wage Fixation emphasizes that wage determination must prioritize the welfare of labourers over the economic capacity of employers, ensuring equitable distribution of resources in agrarian economies.^{xxxv} In *Workmen vs. Reptakos Brett & Co. Ltd*^{xxxvi}, the court held that wage fixation must be guided by the constitutional goal of social justice and human dignity. It expanded the concept of minimum wage to include education, medical needs, recreation, recreation and other basic necessities for which Articles 38,39,41,42 and 43 were relied upon to decide the dispute for their welfare.

10. Recommendations for the Protection of Agriculture Labourers

First enact a comprehensive specific legislation to protect the agricultural labourer in which define agriculture labourer rather than agriculture worker in all the labour legislation in a systematic manner so as to protect all the agricultural labourers across the nation. Revise the minimum support price based on the prevailing market and economic conditions of the those who are concentrating on the agriculture so as to provide minimum wages to the agriculture labourers and accordingly to implement the Minimum Wage Code, 2020 effectively irrespective of the agriculturalist conditions. Create alternate employment to the agricultural labourers to meet out their livelihood and basic necessities by way of providing small scale industries and cottage industries in their rural areas due to seasonal unemployment. In order to achieve social justice through the constitution of India, introduce social security measures for the agricultural labourers and also introduce the compulsory insurance with widest coverage with zero loss strategy. The government of Tamilnadu should provide enhanced old age pension scheme for the agricultural labourers and reduce the age of eligibility to claim for which provide adequate and generous financial assistance for their family security. Improve the working conditions of agricultural labour by enforcing fixed hours of work and there to improve the enforcement mechanisms. Ensures that the state and central agriculture, labour and social welfare departments to be effectively coordinated and cooperated for the welfare of agriculture labourers and their protection of their families. The State should mandate the provision of protective equipment such as gloves, masks, goggles, protective clothing, and

waterproof boots to agricultural labourers handling fertilizers, pesticides, and field operations. Regular safety training and awareness programmes should also be implemented to promote occupational health, prevent work-related injuries, and ensure safer working conditions in the agricultural sector. Create awareness among the agricultural labourers about their rights and responsibilities in their understanding language, right from their village and street level with the assistance of the agriculture office extension centres. For which sufficient manpower resources to be extended to cover all the labourers. Stringent action to be initiated against those who are cheating the agricultural labourers and prevent the intermediaries and directly bring all kinds of welfare measures to their door steps. An appropriate legal aid cell needs to be instituted by the Government that may take up cases for an aggrieved agricultural labourer, representing their case at every level without charging any expenses. It would improve justice delivery and enhance protection of workers rights and give legal voice to vulnerable workers who can be unable to file a case against the exploiter on account of being financially incapacitated to afford a lawyer. Because, agriculture labourers form the back-bone of agriculture so; to say first priority needs to be given to these agriculture labourers on all aspects.

11. Conclusion

In conclusion it may be said that the rural agricultural labor in Tamil Nadu is still caught in the web of socio-economic insecurity as landlessness, casual employment, structural injustice on lines of caste and gender, etc., influence and determine their condition of existence despite all policy intervention by the state in the form of MGNREGA, etc., as poor implementation and low coverage limits livelihood security, whereas climate change, urbanisation and mechanisation add to their miseries. A more comprehensive policy that ensures decent wages, enhanced social security, skill upgradation, employment generation and alternative livelihood is needed to uplift their condition and establish social justice. In no condition can a nation sustain itself if working space of agricultural laborers of the state and also entire nation faces the issue of insecurity of sustenance and national food security is put to test through dependence on imports from foreign nations. Thus, self-reliance is expected to be attained through our own Agricultural Labor Force for the better and security of the nation and all the people across the nation.

12. Reference:

-
- [1.] ⁱ Dr. R. Elumalai, Assistant Professor, Government Law College, Chengalpattu, Tamilnadu, Email id: elumalai1213@gmail.com and S. Azhagumalar II Year LLM

-
- (Labour & Administrative Law), Government Law College, Pattaraiperumpudur, Tiruvallur, Email id: lithumalar.20@gmail.com
- [2.] ⁱⁱ Dr. S. Jagathrakshagan, A Book for Humanity, 211 (Aazhvaar Research Centre, Chennai, 1999) Thirukkural Chapter 104, Couplet 1036, is about agriculture and the workers involved. The couplet in Tamil is Uzhavinar kaimmadangin illai vizhivuthum, vittaen baarkkum nhalai (meaning "Even those who claim to have renounced all desire cannot enjoy their positions for long if peasants stop ploughing and Dr. R.J.A Stephen Loie @ R. Stephen Louie, Thirukkural English Couplet - 4+3 word couplet thirukkural Translation, 211 Palaniappa Brothers, Chennai, 2018)
- [3.] ⁱⁱⁱ Krishnamurthy, J, *The growth of agricultural labour in India – A Note in G. Prakash* 107-109 (Subaltern Studies VII, Oxford University Press, 1992)
- [4.] ^{iv} Government of India, Ministry of labour, Agricultural Labour Enquiry Committee Report, 150-51 (Labour Bureau, Government of India, 1955), cited in Labour Bureau, Rural Labour Enquiry: General Characteristics of Rural Labour Households 2009-10, Chapter I, Para 1.1, p.1 available at: <https://labourbureau.gov.in>, last visited on June 10, 2026.
- [5.] ^v Agricultural labour in India: Report on the Second Agricultural labour Enquiry, 156-57, India. Volume 1, Issue 53 of Publication (Labour Bureau, Ministry of Labour and Employment) available at: <https://books.google.co>, last visited on June 11, 2026.
- [6.] ^{vi} Desai, S.S, *Agriculture and Rural Banking in India, Problems of Agriculture Labour* 86 (Himalaya Publishing House, 3d Revised Edition, 1990) describing the Two-committee definition of the Agricultural labour.
- [7.] ^{vii} C. Anitha Faboliya, "Agricultural Workers: A comprehensive Overview of their Importance and Challenges," *7 International Journal of Law, Management & Humanities* 1570 (2024), available at: <https://www.ijlmh.com/>, last visited on June 11, 2026.
- [8.] ^{viii} Report of the Committee on labour Welfare, 1969 gives the definition of Agricultural labour under the Chapter of XXXII, p.211, available at: <https://archieve.org>, last visited on June 11, 2026.
- [9.] ^{ix} The Census of India, 1961 available at: <https://censusindia.gov.in> last visited on April 6, 2026.
- [10.] ^x The Tamilnadu Agricultural Labourers – Farmers (Social Security and Welfare) Act, 2006, s.2 (2) defines the term of Agricultural Labourers.
- [11.] ^{xi} AIR 1931 Bom 284, available at: <https://www.scconline.com> last visited on June 10, 2026
- [12.] ^{xii} Census of India, 2011, available at: <http://censusindia.gov.in>, last visited on April 5, 2026
- [13.] ^{xiii} Government of India Economic Survey 2024-2025, discussed in Down to Earth, 'Economic Survey 2025: Employment Increased in agriculture Sector, Decreased in Manufacturing and Services'.
- [14.] ^{xiv} International Labour Organization, Safety and Health in Agriculture: Code of Practice (ILO, Geneva, 2011), pp. 97-112. The use of machinery and equipment needs to be adequately trained in order to avoid occupational accidents in agriculture, it can be consulted in: www.ilo.org , accessed on 11th June, 2026.
- [15.] ^{xv} National Survey Sample Office (NSSO), Situation Assessment of Agricultural Households and Land & Livestock Holdings of Households in Rural India, NSS 77th Round (period of survey: 1 st July 2019 to 30 th June 2020) Report No.587 [Ministry of Statistics and Programme Implementation, Government of India], source available at: <https://www.pib.gov.in> , last accessed on June 11, 2026

- [16.] ^{xvi} Srinidhi D, 'An analysis on problems faced by Agricultural labourers in Tamil Nadu - The legal framework for their protection' 4 IJLSSS 111-122 (2026), available at <https://ijlsss.com/wp-content/uploads/2026/01/10.-Srinidhi-D.pdf>, visited on 10 June 2026.
- [17.] ^{xvii} Government of Tamil Nadu State Planning Commission, "2025 Report on "Rural non-farm Employment in Tamil Nadu", available at [https://spc.tn.gov.in/reports - 2021-2025](https://spc.tn.gov.in/reports-2021-2025)" last visited on 3rd April 2026.
- [18.] ^{xviii} The Hindu (English) Newspaper dated June 9, 2025, available at: <https://thehindu.com>, last visited on June 10, 2026.
- [19.] ^{xix} Alex Saint George, "Social and Economic Aspects of Attached Labourers in Kuttanad Agriculture" (1998) 22 (52) Economic and Political Weekly 17-21.
- [20.] ^{xx} R. Elizabeth Rani & C. Vijaya Chandrika, Women and Agricultural Participation in Tamil Nadu: A Theoretical and Empirical analysis, 13 International Journal of Agriculture and Rural Economic Research 36-45 (2025).
- [21.] ^{xxi} SLP(C) NO(S) 14669 – 14680/2018 decided on 24 October 2007, available at: <https://indiankanoon.org>, last visited on June 11, 2026.
- [22.] ^{xxii} National Crime Records Bureau, Accidental Deaths and Suicides in India Report 2022, Ministry of Home Affairs, available at: <https://ncrb.gov.in>, last visited on April 5, 2026
- [23.] ^{xxiii} The NSSO Report No.587 on 77th Round, available at: <https://ruralindiaonline.org.in/>, last visited on June 11, 2026.
- [24.] ^{xxiv} Ministry of Rural Development, Government of India, Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA), available at: <https://nrega.nic.in/>, last visited on June 11, 2026.
- [25.] ^{xxv} Government of Tamilnadu, Department of Economics and Statistics, Statistical Handbook of Tamilnadu, available at: <https://des.tn.gov.in>, last visited on April 5, 2026
- [26.] ^{xxvi} Department of rural Development, Government of India, Viksit Bharat Guarantee for Rozgar & Ajeevika Mission (Gramin) Act, 2025 (Guarantees 125 days for guaranteed wage employment, a 60-day-no-work period during peak agricultural seasons, timely wage payments, and infrastructure-oriented employment generation) available at: <https://www.dord.gov.in/>, last visited on June 11, 2026.
- [27.] ^{xxvii} AIR 1983 SC 328, available at: <https://ww.scconline.com>, last visited on April 6, 2026
- [28.] ^{xxviii} AIR 1986 SC 180, available at: <https://ww.scconline.com>, last visited on April 6, 2026
- [29.] ^{xxix} AIR 1962 SC 12, available at: <https://www.scconline.com>, last visited on April 6, 2026.
- [30.] ^{xxx} AIR 1998 SC 3164, available at: <https://ww.scconline.com>, last visited on April 6, 2026.
- [31.] ^{xxxi} All India Agricultural Labour Association vs. Government of Tamilnadu, W.P. No. 21761 of 2011, decided on 28th April 2023 (Madras High Court), available at: <https://indiankannoon.org>, last visited on June 11, 2026.
- [32.] ^{xxxii} V. Krishnaveni Vs State of Tamil Nadu, H.C. P. No 2511 of 2023, decided on March 26, 2024, available at: <https://indiankanoon.org>, last visited on June 11, 2026.
- [33.] ^{xxxiii} AIR 1982 SC 1473, available at: <https://www.scconline.com>, last visited on April 5, 2026.
- [34.] ^{xxxiv} AIR 1984 SC 802, available at: <https://ww.scconline.com>, last visited on April 5, 2026.

- [35.] ^{xxxv} The Constitution of India, 1950, Arts. 38, 39 and 43 deals with socio, economic conditions of labourers
- [36.] ^{xxxvi} (1992) 1 SCC 290, available at: <https://www.scconline.com>, last visited on June 11, 2026.