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# CONSTITUTIONAL AND LEGAL PERSPECTIVES ON TAMIL NADU'S OPPOSITION TO THE THREE- LANGUAGE POLICY

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## **Abstract**

This article examines the constitutional and legal dimensions of Tamil Nadu's long-standing resistance to the Union Government's Three-Language Policy, particularly as presented in the National Education Policy (NEP) 2020. This resistance draws on the Dravidian movement and the historical resistance to Hindi imposition. Tamil Nadu's two-language formula—Tamil and English—is both an educational model and a political declaration of linguistic identity. The article analyzes pertinent constitutional provisions (Articles 29, 30, 343, and 351), federal dynamics in the Seventh Schedule, and significant legal instruments such as the Official Languages Act of 1963. It also critically analyzes judicial rulings such as *State of Karnataka v. Union of India* (1978) and *T.M.A. Pai Foundation v. State of Karnataka* (2002) to realize the boundaries of state autonomy in education. The analysis concludes that Tamil Nadu's argument is both constitutionally and legally correct, and this mirrors wider tropes of cooperative federalism, cultural diversity, and the constraints of central powers in India's multilingual society.

**Key words:** Three-Language Policy, National Education Policy (NEP) 2020, Tamil Nadu, Linguistic Identity, Official Languages Act, 1963, Cooperative Federalism, Multilingual Society.

## **1. Introduction**

Language has always played a big role in India's politics and culture.

In Tamil Nadu, the pride in the Tamil language is closely linked to political actions. This connection started with the anti-Hindi protests in 1937 and reached its highest point in the big demonstrations of 1965. Because of this history, Tamil Nadu continues to support a bilingual

policy that uses Tamil and English. This policy is more than just an administrative choice; it shows Tamil Nadu's independence in language and culture within India.

The recent focus on the Three-Language Policy in the National Education Policy (NEP) 2020 has caused debates about the Constitution, laws, and the relationship between the central and state governments.

While the NEP says it is flexible, people in Tamil Nadu see it as a centralizing move that could threaten their regional identity and freedom. Tamil Nadu's reaction shows bigger worries about cooperative federalism, cultural diversity, and how power is shared between the center and the states, especially when it comes to education, which is on the Concurrent List of the Constitution.

This paper examines the constitutional articles connected to the language debate—Articles 29, 30, 343, and 351—as well as the Official Languages Act of 1963 and important court cases like *State of Karnataka v. Union of India* (1978) and *T.M.A. Pai Foundation v. State of Karnataka* (2002).

It also looks at the political and cultural importance of the Dravidian movement in shaping Tamil Nadu's language policy. It shows how these historical, legal, and political factors support Tamil Nadu's strong legal and constitutional position against the Three-Language Policy of the central government.

## **2. Historical Context of Tamil Nadu's Language Policy**

Tamil Nadu's strong stance against the Union Government's Three-Language Policy comes from a long history of resisting Hindi imposition. This resistance is rooted in the region's social and political changes, especially influenced by the Dravidian movement. Tamil Nadu has a unique two-language system that uses Tamil and English. We can understand Tamil Nadu's language policy through three important historical events: the anti-Hindi agitation from 1937 to 1940, the mass protests in 1965, and the official introduction of the two-language policy in 1968.

### **2.1 Anti-Hindi Agitation of 1937–1940**

In 1937, Rajaji, the Chief Minister of the Madras Presidency, made Hindi a compulsory subject

in secondary schools. This caused strong opposition. The Self-Respect Movement led by Periyar E.V. Ramasamy and the Justice Party organized large protests with fasting, picketing, and meetings across Tamil-speaking areas. More than 1,200 people, including students and women, were arrested. Two protesters, Thalamuthu and Natarajan, died in police custody, which became a powerful symbol of Tamil resistance. Under pressure, Governor Erskine suspended the requirement for Hindi in February 1940, marking a major win for the Tamil national movement.

## **2.2 The 1965 Anti-Hindi Agitations**

In January 1965, the Union government announced plans to replace English with Hindi as the only official language. This led to violent protests in Tamil Nadu, mainly led by students and youth. At least 70 people were killed, along with acts of arson and self-immolation. The Dravida Munnetra Kazhagam (DMK), led by C.N. Annadurai led these protests and pushed the central government to keep English as an official language. This movement led to a big political shift, ending with the DMK's big win in the 1967 state elections. These events showed that Tamil Nadu saw language not just as a way to communicate, but also as a tool of political power and cultural survival.

## **2.3 Adoption of the Two-Language Policy in 1968**

After the protests, Chief Minister Annadurai officially introduced a two-language policy in 1968 that made Tamil and English part of state education. While English stayed for its usefulness, Tamil became an important symbol of cultural and political identity. This choice was a clear rejection of Hindi and showed Tamil Nadu's linguistic independence. The policy has remained a key part of Tamil Nadu's identity within the Indian federal system. Jayasundara. N.S (2014) notes that elevating Tamil as a symbol of cultural pride while keeping English for its practical use showed Tamil Nadu's awareness of both local identity and global economic realities.

## **2.4 The Dravidian Movement and Linguistic Identity**

The Dravidian movement, supported by the Justice Party, Dravidar Kazhagam, and DMK, focused on anti-Brahminism, social justice, and protecting Tamil culture. Leaders like Periyar, Annadurai, and Karunanidhi saw Tamil as not just a local language, but also a way to resist North Indian cultural dominance. Language became a key part of Tamil nationalism and state politics, shaping policies and identity to this day. The movement opposed central education

systems like Navodaya Schools and national policies seen as promoting Hindi. According to Jayasundara. N.S (2014), Tamil Nadu's language policy developed to respond to political demands and economic needs, placing Tamil as a symbol of local identity and English as a tool for global importance.

### **3. Constitutional Framework**

India's democratic system with multiple languages depends on a strong constitutional structure that brings together the country's unity with its diverse languages.

The opposition in Tamil Nadu to the three-language policy should be seen not just as a political issue, but also in the context of important constitutional rules that protect language rights and define the roles of the Union and the states.

#### **3.1 Article 29: The Right to Protect Cultural and Linguistic Identity**

Article 29(1) of the Constitution allows any group of citizens who share a unique language, script, or culture to maintain their identity. While this is often linked to minority groups, the Supreme Court has interpreted it broadly to include linguistic communities within states, even majority groups.

For a long time, Tamil Nadu's two-language policy—Tamil and English—has been seen as a way to protect this right. The resistance to Hindi isn't about opposition; it's about preserving Tamil language and culture. A study shows Tamil speakers worry that the introduction of Hindi through the National Education Policy (NEP) 2020 might make Tamil less important in education and public life, which could harm its cultural and practical status. Surveys also show that most students and parents in the state are against making Hindi a mandatory subject in schools. So, Tamil Nadu's position can be seen as a way to protect the right to retain their unique language, as stated in Article 29.

#### **3.2 Article 30: Rights to Establish and Administer Educational Institutions**

Article 30 gives religious and linguistic minorities the right to start and run their own schools. Though Tamil speakers are not a minority in Tamil Nadu, they are a linguistic minority at the national level. In a case called *T.M.A. Pai Foundation v. State of Karnataka*, the Supreme Court broadened the idea of "minority" to include groups defined by state borders. Tamil Nadu promotes "Scientific Tamil" education and bilingual literacy in English and Tamil. These

choices, as part of the state's changing curriculum and education policies, support the goals of Article 30 and the idea of regional educational control.

### **3.3 The Seventh Schedule and the Concurrent List: Legislative Power and Federal Tension**

Education is listed in Entry 25 of the Concurrent List, meaning both the Union and the states can make laws about it. However, Article 254 says that if there's a conflict, Union laws win unless the state law gets approval from the President. The National Education Policy (NEP) 2020, though not a legal law, is a significant policy. It encourages a three-language system that promotes Hindi, English, and the state language. Tamil Nadu sees this as a violation of its constitutional rights. The way the policy is implemented, along with its adherence to national guidelines, threatens the federal idea of working together. Research from Anbu (2025) notes some key problems in Tamil Nadu—like hiring Hindi teachers and lack of teaching materials—which highlight the need for local control over education. These practical issues support the constitutional argument for more local control and regional focus.

### **3.4 Article 351: Directive for Promotion of Hindi**

Article 351 asks the Union to promote Hindi as part of India's diverse culture. It's a non-enforceable directive that must not conflict with fundamental rights and the federal system. Tamil Nadu argues that Article 351 can't be used to justify forcing Hindi on people. Records from the Constituent Assembly and statements from the central government show that Hindi was never meant to replace local languages. Tamil Nadu is the only state that has refused to join the Navodaya Vidyalaya program because of mandatory Hindi lessons, showing its support for constitutional pluralism and its regional identity.

## **4. Legal Perspectives**

### **4.1 Official Languages Act, 1963**

The Official Languages Act, 1963 was created to address growing concerns among non-Hindi speaking states, especially Tamil Nadu, about the possibility of Hindi becoming the only official language of the Union. Originally, Article 343 of the Constitution stated that English would be replaced by Hindi as the official language of the Union within fifteen years (by 1965). However, large-scale protests, especially in Tamil Nadu, led to the passing of the Official Languages Act. This Act allowed for the continued use of English alongside Hindi for official Union purposes. Importantly, the Act only concerns the official language of the Union

government and its communications.

It does not dictate the language of instruction or the language policy in state-level education. Education through language is included in the Concurrent List (Entry 25 of List III) of the Seventh Schedule. This gives states the freedom to create their own language policies for schools, as long as they do not conflict with central laws. Since the Official Languages Act does not require states to include Hindi in their school syllabus, Tamil Nadu's decision not to adopt the three-language formula and its continued use of the two-language formula (Tamil and English) is not against the Act or unconstitutional. The main goal of the Act was to preserve linguistic harmony and not to force states to adopt Hindi.

Tamil Nadu's position aligns with this federal approach, using its legislative authority under Article 246 along with Entry 25 of List III to shape its own educational system. State governments have consistently upheld this autonomy, and this legal framework ensures that no national policy forces linguistic uniformity, as suggested by policies like the NEP 2020. Therefore, Tamil Nadu's two-language policy is a constitutionally valid and legally sound expression of state autonomy.

It aligns with the framework of the Official Languages Act, 1963 and supports the broader principle of cooperative federalism in the Indian Constitution.

#### **4.2 National Education Policy, 2020**

The National Education Policy (NEP), 2020 promotes a three-language formula as a key mechanism for enhancing multilingualism and national unity. According to the policy, students should learn three languages at school, two of which must be Indian languages. The policy clearly states that the choice of language is up to the states, regions, and students, showing a commitment to flexibility and non-imposition. However, the policy, although not mandatory, has raised constitutional and political concerns, especially in Tamil Nadu. The state's opposition is not just about the content of the policy, but also about its implications in the wider historical and federal context. Tamil Nadu perceives the NEP as reviving past attempts to make Hindi the unifying language of the nation, even though it claims to give states more autonomy.

Constitutionally, education is a concurrent subject (Entry 25 of List III, Seventh Schedule), which means both the Union and the states can legislate on it. However, when there is a conflict,

central policies or laws are often seen as more influential, a trend that Tamil Nadu views as threatening the principles of federalism. Although the NEP 2020 does not make the three-language formula compulsory, its language and strategies—such as funding priorities and curriculum design—might indirectly push states towards compliance, thereby limiting real policy choice. Tamil Nadu sees this as an example of "coercive federalism," where national policies influence state decisions without direct enforcement.

Given Tamil Nadu's history of resisting Hindi imposition, such as the anti-Hindi protests in the 1930s and 1960s, rejection of the initial three-language formula, and opposition to the 1968 education policy, the NEP 2020 is viewed with suspicion and in light of past political memories. The state's strong preference for the two-language formula (Tamil and English) is not just an educational decision, but also an expression of regional identity, political autonomy, and constitutional interpretation. Legally, since the NEP is a policy document and not a binding law, Tamil Nadu is not required to follow its recommendations. Its choice to reject the three-language formula is a genuine exercise of its sovereignty under the constitutional structure. This decision reflects the balance of federalism that the Indian Constitution aims to uphold.

In essence, Tamil Nadu's reaction to the NEP 2020 highlights the tension between national policies and local cultural and political realities. It emphasizes the need for cooperative federalism and constitutional support for linguistic diversity in India.

#### **4.3 State of Karnataka v. Union of India (1978)**

The case of *State of Karnataka v. Union of India*, AIR 1978 SC 68 is a significant legal decision that discusses the balance of power between the central government and the states in India's semi-federal system. While the case focused on the powers of the Union under Article 356 and the recommendations of the Sarkaria Commission, the Supreme Court also made important comments about the federal nature of the country and the sovereignty of the states, especially in areas covered by the State and Concurrent Lists. The Court emphasized that India is not a traditional federation, but it is a federal country with a strong central government. It stressed the need for a balance between national unity and state autonomy. The Court clarified that states are not just parts of the Union, but have their own constitutional space to act, especially in matters like education, public health, and language, which are closely related to regional identity and culture.

This case is important for your study because it shows that states have the right to make laws and policies on the Concurrent List, which includes education (Entry 25 of List III). The Supreme Court's interpretation of the relationship between the center and the states supports the view that the Union can't impose national education policies too strongly, unless there is proper central legislation. Tamil Nadu's refusal to follow the Three-Language Policy proposed in the National Education Policy 2020 can be legally justified because of this case. Since NEP 2020 is just a policy document and not a law, and education is covered in the Concurrent List, Tamil Nadu has the right to use its own two-language policy. The case also highlights the importance of respecting state-specific cultural and linguistic contexts, which supports Tamil Nadu's position. The ruling confirms that diversity in state policies is not only allowed but welcomed in a country like India. Thus, this decision supports Tamil Nadu's claim to have control over education and language policy, preventing any centralization that goes against the federal spirit of the Constitution.

#### **4.4 T.M.A. Pai Foundation v. State of Karnataka (2002)**

The Supreme Court's decision in *T.M.A. Pai Foundation v. State of Karnataka*, (2002) 8 SCC 481 is a major ruling on educational freedom, linguistic rights, and minority rights. While the main issue was the protection of minority rights under Article 30(1) to establish and manage educational institutions, the judgment also set important rules about educational policy and institutional independence, which are relevant to the current discussion on language policy and federalism. One of the key points made by the Court was that private schools, even those not funded by the state, can choose their language of instruction.

The Court said the state and central government can't force a particular language on these schools unless it's in the public interest or for a strong reason, and it must be supported by law. This shows the importance of linguistic choice as a part of educational freedom and highlights that language policies in education should be sensitive to local conditions and not forced on anyone. Looking at Tamil Nadu's two-language policy and its resistance to the centrally suggested Three-Language Formula in the NEP 2020, this case provides legal support for local decision-making. If private schools can choose their language, then state governments, which have the power to set education policies under Entry 25 of the Concurrent List, should also have the same freedom, especially in public education. Additionally, the judgment points out that education in India is not something that should be controlled by the center alone, but something that needs to take into account the specific needs and situations of each state.

Tamil Nadu's decision to teach in Tamil and English without using Hindi fits with its constitutional duty to protect and promote the language and culture of its people under Articles 29 and 30. Therefore, the T.M.A. Pai Foundation case is a key legal support for the idea that education policies, especially language, should not be controlled by the center unless they align with the region's identity, public opinion, and the Constitution. Tamil Nadu's educational choices, made through past opposition to linguistic dominance and within the constitutional framework, are clearly supported by the principles set out in this case.

#### **4.5 Samagra Shiksha Funds Dispute**

During the last few years, Tamil Nadu complained that the Union Government withheld or delayed releasing funds under the Samagra Shiksha scheme—a centrally sponsored flagship school education programme—presumably in retaliation for the state's refusal to adopt the Three-Language Formula as proposed under the National Education Policy (NEP), 2020. Although no official judicial determination has been made on this issue, the charge, if true, poses serious constitutional concerns about the federal arrangement, fiscal federalism, and the abuse of discretionary grants for political or policy concession reasons.

According to Article 282 of the Constitution of India, both the Centre and State governments can make grants for any public purpose without considering whether the subject matter comes under their respective legislative competence. Samagra Shiksha is being run under this regime as a Centrally Sponsored Scheme (CSS) in which funding will be shared between the Centre and the States. Although these grants are legally discretionary, they are distributed according to set schemes, guidelines, and budgetary undertakings, and not intended as leverage against states that make lawful policy choices.

Tamil Nadu's complaint is that the Centre is employing money bills to force compliance with a non-binding policy guideline—the NEP 2020. If so, it is a breach of cooperative federalism principles where the Centre and States are supposed to operate as co-equals, especially in matters of joint responsibility such as education, which is included in the Concurrent List (Entry 25, List III).

In addition, such financial coercion defies the constitutional separation of powers and can be interpreted as a backdoor mechanism to impose the Three-Language Policy in states that have legally decided against its implementation. The Two-Language Formula of Tamil Nadu,

adopted under state policy, is a constitutionally permissible exercise of its legislative and executive authority. Withholding funds as a retaliatory action, absent any constitutional or legal requirement to follow the NEP, breaches the doctrine of reasonableness and non-arbitrariness under Article 14, and upsets the fragile federal balance envisioned by the Constitution.

This example also raises a larger question: if centrally sponsored schemes are rendered conditional on ideological or policy congruence, states can be stripped of their constitutional elbow room to rule according to local requirements, democratic mandate, and historical context. In Tamil Nadu, where politics has long revolved around language as a determinant of political identity and social mobilisation, such central actions may not merely be unconstitutional but even socially subversive.

Finally, the Samagra Shiksha funding impasse is the perfect case of the threat of financial centralisation being utilised to subvert federal autonomy. In the event that policy differences—specifically on culturally charged matters such as language—result in fiscal sanctions, it is a bad precedent that weakens the federal character of the Constitution and deters meaningful democratic opposition in policy-making.

## **5. Political and Educational Implications**

Tamil Nadu's Two-Language Formula, requiring the teaching of Tamil and English in schools, is not merely an administrative choice—it's a policy thoughtfully designed to match the state's socio-political identity, historical experience, and constitutional vision of linguistic parity and federal autonomy. The educational and political underpinnings of the policy are closely linked and play an important role in comprehending the state's persistent opposition to the Three-Language Formula as advocated by the National Education Policy (NEP), 2020.

### **5.1 Impact on Education**

In terms of education, Tamil Nadu's two-language system has worked well. It helps keep Tamil alive, which is an old, important language with a rich history, and it makes students proud of their culture and language. At the same time, English is useful because it helps people move up in life, learn about the world, and get better jobs and education. This way of teaching two languages helps students connect with their roots while also preparing them for the world—something that's important in today's education. But making students learn a third language, like Hindi, brings up some big problems.

Tamil Nadu says there aren't enough trained teachers for Hindi and other third languages, especially in poorer and government-run schools. Adding a third language could strain the school system and take away time from important subjects, making things harder for students. It might also create unfair advantages, as students in better-funded schools can afford extra help with languages, while others in less supported schools can't.

## **5.2 Political and Constitutional Significance**

Politically, Tamil Nadu's decision to not follow the Three-Language Formula shows that it wants to keep control over its own governance and language. This reflects a long tradition from the Dravidian movement, which has opposed Hindi being used as a way to dominate culture from the North. Past protests against Hindi in the 1930s and 1960s were not just about language; they were also about standing up for regional pride, fairness, and equal treatment in the Indian Union.

By sticking to its own language policy, Tamil Nadu positions itself as a supporter of federal values and linguistic diversity as written in the Constitution. This policy makes Tamil Nadu different because it resists making everyone the same culturally and reminds people that India's strength comes from its many languages. This resistance has also been clear in elections, where leaders from all parties have mostly rejected the Three-Language Formula, showing that it's a choice supported by the majority of the people in the state.

Tamil Nadu's experience also shows how language policies are a way to express constitutional ideas, involving different parts of the Constitution like Article 29 and 30 about cultural rights, Article 19(1)(a) about freedom of speech, and the idea of cooperative federalism. It shows that education policies in states are not just local matters but are deeply tied to the country's identity, the legitimacy of democracy, and how different levels of government work together. In short, Tamil Nadu's two-language system has both good educational benefits and is supported by the Constitution.

It is a smart choice based on local needs, past experiences, and legal rules. The political stance behind this policy is not about breaking rules but about claiming the rights guaranteed by the Constitution in a federal system. Tamil Nadu's position helps the ongoing conversation about how a country like India, which is both multilingual and federal, can balance unity and diversity, especially when it comes to language and education. The language policy of Tamil

Nadu has helped students learn Tamil and English well, supporting both cultural traditions and global skills.

Adding a third language, especially Hindi, is seen as a threat to regional identity and also as a difficult task, since there are not enough qualified teachers available. Politically, this policy helps Tamil Nadu maintain its unique position within the Indian federation and shows the lasting influence of the Dravidian movement.

## **6. Political and Educational Implications**

Tamil Nadu's persistence with its Two-Language Formula—Tamil and English—is educationally and politically significant in its implications for the state, grounded in the constitutional ideals of cultural autonomy, linguistic diversity, and cooperative federalism. The language policy not only shapes the nature of the educational experience for children in the state but is also a strong badge of regional identity, self-rule, and resistance to centralisation of culture.

### **6.1 Educational Implications: Cultural Continuity and Global Access**

At the educational front, the policy guarantees students' proficiency in Tamil, thus ensuring a strong linguistic heritage preceding most contemporary languages in the Indian subcontinent. Sustaining the mother tongue is provided for under Article 29(1) of the Constitution, which guarantees any section of citizens the right to conserve their unique language or culture. The policy also requires English teaching, thus imparting the students with an international language that is essential for further studies, competitive exams, jobs, and global mobility.

In contrast, implementing the Three-Language Formula, particularly with Hindi as the third one of these languages, is seen by Tamil Nadu as a load on education, particularly in terms of curriculum overload, shortage of teachers, and infrastructural limitations. According to reports filed by Tamil Nadu's education department and academic reviews, the state has an inadequate supply of qualified Hindi instructors, particularly in rural schools and government institutions. This would most probably lead to unequal enforcement, which would disproportionately affect disadvantaged students, hence creating concerns of equality and access to education under Article 21A (Right to Education) and Article 14 (Right to Equality).

## 6.2 Political Implications: Assertion of Federal Identity

Politically, Tamil Nadu's resistance to the Three-Language Formula is not just a local or administrative move, but a constitutional effort to show the strength of federal sovereignty.

The state's position is based on a deep political agreement that goes beyond party lines, and it has its roots in the Dravidian movement, which has always fought against the forced spread of Hindi as a symbol of dominance from the North. This movement played a key role in redefining Indian federalism as a system where all states are equal, especially after India gained independence.

The language policy, therefore, is a political statement showing how unique Tamil Nadu is as part of the Indian federal system.

It is a form of sub-national constitutionalism, where the state uses its authority under Entry 25 (Education) of the Concurrent List and refers to the ideas in Articles 246 and 356 to resist any pressure from the Union Government—like conditional funding or national policies that could weaken the state's constitutional position. Moreover, Tamil Nadu's language policy serves as a fair response to majoritarian cultural nationalism, and it supports the idea of India's diverse communities living together.

It reflects the belief that unity in diversity should not mean enforcing uniformity through centralized policies. This view aligns with the Supreme Court's decisions in *State of Karnataka v. Union of India* (1978) and *T.M.A. Pai Foundation v. State of Karnataka* (2002), which both stress the importance of local control over education and cultural identity. Thus, Tamil Nadu's language policy has more than just academic meaning; it is a constitutional, cultural, and political protection.

It ensures that the state can represent local needs, linguistic rights, and national duties while keeping the federal system intact. The focus on Tamil and English is a deliberate and constitutional way to challenge the broader implications of the Three-Language Formula, highlighting that linguistic identity and educational freedom are part of India's federal structure. Tamil Nadu's language policy has helped students become skilled in both Tamil and English, which improves both cultural traditions and global awareness.

Adding a third language, especially Hindi, is seen as a threat to regional identity and as a heavy burden on the education system, especially since there's a lack of trained Hindi teachers. Politically, this policy reinforces Tamil Nadu's independent stance within the Indian federation and shows the lasting impact of the Dravidian movement.

## 7. Analysis

Opposition to making Hindi the official language in Tamil Nadu started in the 1930s, but became more powerful during the anti-Hindi protests from 1937 to 1940 and again in the 1960s. The Dravidian movement, which focused on pride in the region, language, and social justice, used Tamil as a symbol to fight against what they saw as control by people from the north. This background helped shape the state's long-standing support for a two-language policy. The idea of a three-language policy was first introduced in the 1968 National Policy on Education and was included in later policies, including the NEP 2020.

This policy aims to promote multilingualism and bring people together, but it is often seen as unfair to states that don't speak Hindi. Although the NEP 2020 talks about being flexible, there's still an assumption in favor of Hindi, which is seen as continuing the central government's influence over language. Articles 29 and 30 of the Constitution protect the education and culture of minority groups. Tamil Nadu's position can also be seen as an extension of these rights to preserve linguistic identity. The state believes its people have the right to keep their language and culture in education. Article 343 makes Hindi the official language of the country, but it also allows English to continue being used. The Official Languages Act of 1963, which was passed because of concerns from non-Hindi states, made English an associate official language and stopped it from being replaced. Tamil Nadu is resisting Hindi's spread based on this legal assurance.

Article 351 talks about developing Hindi, but forcing its use is different from developing it. This article must be understood along with Articles 29, 30, and 343, which show that India is a multilingual country. Education is listed in the Concurrent List of the Constitution, meaning both the Union and state governments can make laws about it. But Tamil Nadu insists on keeping control over education policies in line with the spirit of cooperative federalism, which encourages consultation between the center and states. Enforcing one-size-fits-all language policies without agreement is against this spirit. Tamil Nadu's resistance is therefore a valid use of state authority.

In the case of *State of Karnataka v. Union of India* (1978), the Supreme Court recognized the importance of federalism in India. While India isn't a federal country like the US, the Constitution gives enough power to the states, especially in areas like education and language. *T.M.A. Pai Foundation v. State of Karnataka* (2002) was an important ruling that protected the rights of religious and linguistic minorities to run their own schools. Its emphasis on educational autonomy is relevant to the situation in Tamil Nadu.

Tamil Nadu's two-language policy is a constitutional balance between national unity and regional rights. Forcing Hindi, either directly or indirectly, can make linguistic minorities feel excluded and go against the actual meaning and spirit of the Constitution. Plus, even though the NEP 2020 is supposed to be flexible, it can favor Hindi unless it is carried out with sensitivity to local needs.

## 8. Conclusion

Tamil Nadu's resistance to the Three-Language Policy stems from a complicated intermixture of history, constitutional rights, and federal values. Articles 29, 30, 343, and 351 have to be read taking into account the state's entitlement to preserving its culture and control over education. Legal ordinances such as the Official Languages Act and judicial precedents lend support to Tamil Nadu's position. This case is a classic illustration of the fine balance between national integration and local autonomy in a multilingual democracy such as India.

## References

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