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# **LEGAL CERTAINTY OR TEXTUAL RIGIDITY: THE BENEFITS AND DRAWBACKS OF INTERPRETING STATUTES LITERALLY**

AUTHORED BY - SMIRTHA G & VARSHA SHREE A I

## **Abstract:**

In terms of literal interpretation of legislation, this article makes a critical examination of the dual phenomena of legal certainty and text rigidity. The article goes into further detail about the possible shortcomings of this method, even if it emphasises the advantages of a physical approach in order to define clearly and reliably any relevant legislative principles. It seeks to identify cases where an enforcement of the statutory language may result in results which are not consistent with legal objectives or have been insufficient for dealing with contemporary social challenges.

In this Article, the impact of literal interpretation on legal outcomes is presented in a way that goes beyond theoretical considerations by providing examples from real life. As a result of the examination of some important cases and controversies, it provides an analytical perspective on the problems that arise as a result of excessively rigid approaches in terms of justice and equity. The article also examines whether there are possible means to mitigate the drawback of textual rigidity, while at the same time ensuring legislative certainty. It probes into jurisprudential debates, proposing a complex framework that permits flexibility in interpretation and does not compromise the clarity and stability of literal approaches.

Finally, the article calls on a wider debate to be had amongst scholars, lawyers and policy makers about how judicial certainty is linked with textual rigidity. It argues that, while maintaining the fundamental principles of constitutional stability and predictability, an approach to legislative interpretation which addresses today's complexity must be applied in a balanced manner.

## Literal Interpretation of Statute

Let's discuss the advantages of reading the statute literally. In today's world, the interpretation of statute can be literal in nature. The main motto of this kind of interpretation is about understanding of law in a plain manner by ordinary citizens of the country. The exact meaning of the word will be taken into consideration, in other terms it should be unambiguous to interpret. In the case of *Abley v. Gale*<sup>1</sup>, Chief Justice Jervis has elucidated the meaning of "literal interpretation" as the precise words are unambiguous and exact in nature, thus those words provide an ordinary sense even though it may also lead to futility and inefficiency on executing justice. The role of judiciary plays a pivotal role of interpreting the laws that the Parliament creates, there will be no necessity of deep interpretation, when the interpretation is clear in nature. To avoid ambiguities of law, the definition clause of the Acts will be referred based on applying in the case, but in some cases the concept of *Pari Materia* is used to interpret in better manner. In *Harshad Mehta v. State of Maharashtra and Patangrao Kadam v. Prithviraj Sayajirao Yadav Deshmukh*<sup>2</sup>, the literal rule is no interpretation and reading statute without twisting the language. It is followed by Judges, lawyers and layman to sustain the ordinary life. The judge compared the literal rule of interpretation with pencil and it must be a pencil, not an animal or bird. He also uttered the social life will be become impossible without literal rule of interpretation. In this type of interpretation, the meaning should be given to the language in the statute irrespective of the consequence, this has been viewed in *Municipal Board v. State Transport Authority, Rajasthan*<sup>3</sup>, When the Regional Transport Authority modified the position of a bus stop, an application was made under Section 64A of the Motor Vehicle Act, which states that such an application must be lodged within 30 days of receiving notice of the order. However, in this case, the application was moved to the authorities after the expiry of 30 days. Therefore, the court has to decide irrespective of the consequences as the language is plain and unambiguous.

### Sub-rules of literal interpretation of statute

Ejusdem Generis is one of the few sub rules of literal interpretation, means the "of the same kind and nature". It is the list of specific words are being followed by the general words in a statute and the general word is interpreted as a way to restrict to include the items or things which will

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<sup>1</sup> 20 L.J.C.P (N.S) 233 (1851).

<sup>2</sup> (2001) 3 SCC 594

<sup>3</sup> (1965) SCC 458

be of same type as those of specific words. This term is well defined in the case of *CIT v. Divya Jewellers pvt ltd*<sup>4</sup>, the court held that the word is the rule of generis words following more specific ones. Those specific words must be distanced form of category.

The doctrine of Casus Omissus refers to the “case omitted” which refers to the legal principle that allows court to interpret and fill the gaps in legislation to achieve equitable outcomes. This doctrine can be construed in two aspects

1. Omission of specific provisions: the legislators avoid some provisions inadvertently that are essential on specific cases. So, this doctrine will be a tool to bridge the gaps to infer the probable intention of the legislation.
2. Changed circumstances: changes may be outdated or inadequate over time. Courts can employ the doctrine to adopt the application of existing laws to suit the current context better.

The maxim Expressio Unius Est Alterius states that "The expression of one thing excludes the other." In *GVK Industries Ltd v. ITO*<sup>5</sup> the definition of this maxim expressed widely. It leads to presumptions which are not specified in the statute are excluded.

### **Advantages of literal interpretation of statute**

This statute formation is based on the understanding of the common man, not just confined to judges and lawyers. In the case of *Fisher v. Bell*<sup>6</sup>, a shopkeeper offered to sell an offensive weapon under the Offensive Weapons Act, of 1959. The court had taken the view through literal interpretation with the accordance of general principles of contract law that displaying a knife does not mean an offer to sale but an invitation to offer. Sometimes a layman may consider the knife to be for sale but going into the deeper interpretation, the display is just an invitation to offer. Therefore, the defendant was not guilty of this offence as the shop window was given the invitation to buy the knife by a potential buyer.

Literal rule of interpretation upholds the doctrine of separation of powers through the judiciary

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<sup>4</sup> (2014) 368 ITR 671 (Allahabad High Court)

<sup>5</sup> (2011) 4 SCC 36

<sup>6</sup> (1961) 1 QB 394

by only interpreting the law in the case of inconsistency. In the case of *Duport Steels v Sirs*<sup>7</sup>, under the constitutional principles of separation of power and parliamentary supremacy, it is the role of judiciary to interpret the law made by the executive and legislature. According to Lord Diplock, “It is for Parliament, not for the judiciary, to decide whether to amend the law in accordance with the provisions of the Act, and it is for Parliament, not for the judiciary, to interpret the law”. The consequences would be inconvenient, even unjust or immoral in nature.

### **Strict interpretation**

The statute should be interpreted by letters strictly and will not be taken liberally. The judge will be taking out the facts based upon the statutes but not on their own will, as the words are unambiguous and there was no need to investigate further. The courts use literal rule of interpretation to not make any wrong inferences from statutes and there will be no bias in judgement. It has a particular set of judicial interpretations that has limits by words, so there will be no further inference on the analysis. In *State of Jharkhand v. Ambay Cements*<sup>8</sup>, the court held that the statute is penal in nature, it should be strictly construed. The court is not open to interpret the conditions which is beyond words, the provision of exemptions must be strictly construed. The conditions explained down are mandatory in nature.

### **Penal statute**

Generally, strict construction must be applied to the criminal statutes, which means there is no need to enlarge by implication or intent beyond the fair meaning applied in the statute. Hence in the case of penal statute will not able to encompass an offence which is beyond the unambiguous words mentioned in the statute. In the case of *R v. Harris*, the defendant bit off the nose of the victim, the statute explained through “to stab cut or wound” a person. The court has applied literal rule of interpretation on the aforementioned case; therefore, the act of biting will not be under of purview of “stab cut or wound” as these words implied has been used, and conviction of the defendant was quashed. The presumption of words used in a criminal statute is exact and clear, no need of superfluous words to elucidate the statute; this has been dealt in the case of *Pritipal Singh v. Union of India*<sup>9</sup> where a criminal charge was filed against the defendant under the

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<sup>7</sup> (1980) 1 WLR 142

<sup>8</sup> (2005) 1 SCC 368

<sup>9</sup> (1982) SCC 140

violations and provision under the “Narcotic Drugs and Psychotropic Substance Act, 1985”.

Strict interpretation of a penal statute provides one important advantage which is called as doctrine of lenity. When there are Two reasonable interpretations and doubts on the meaning of a criminal law, it gives rise to two interpretations, an interpretation leaning in favor of the defendant shall be taken into account by the court. In addition, in cases where doubts are raised as to the existence of a meaning, that benefit shall also lies in favor of the defendant. In *Tolaram v. state of Bombay*<sup>10</sup>, it was held that if two viable and reasonable interpretations of a criminal provision exist, the court must favor the interpretation that exempts the subject from punishment over the one that imposes the penalty.

### **Taxing statute**

In the interpretation of tax statute, Article 265 of the Indian Constitution explains prohibition of state on extracting from citizens without the authority of law. Even the laws of taxation need to be strict in nature as a competent legislature is required to mandate taxing to avoid the whims and burden towards citizens by the state. It is salient in this statute to look what they mean clearly.

The taxation statute involves three stages,

1. Subject on which the tax is imposed.
2. Assessment of the liability of assessee
3. The recovery once the assessment is made.

The charging plans are been into consideration on the degree and incorporation of the subject concerning to whom it is applicable. The taxing statute, the words play an important role on deciding this matter. In the case of *State of Uttar Pradesh v kores India Ltd*, issue raised on whether the incorporation of carbon paper will be included in the meaning “paper”. The Supreme court compares the uses of paper and a carbon paper, where a paper is used for composing, bundling and printing altogether, and a carbon paper is used for various purpose. Subsequently, the carbon paper will not be associated with normal paper in the subject of tax assessment. Usually, this statute is required to be check with great strictness and they need to be considered with literal interpretation irrespective of the consequences. The main motto of this interpretation is to prevent tax evasion. In case of two possible interpretations, the interpretation favorable to

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<sup>10</sup> (1954) SCC 496

the taxpayer is required to be preferred which is referred in the case of *Union of India v. Onkar. S. Kanwar*<sup>11</sup>. It has been noted that the taxing statute has to be straight forward and unambiguous, such language is deduced from the intention of the legislature, this has been referred in the case of *Natha Ram Agarwal v. State of Madhya Pradesh*.

So far, the advantages of reading the statute as it is was discussed. Now let's elaborate the discussion on the disadvantages of reading the statute as it is.

### **Cons of reading the statute as is:**

Primarily the statute has to be read as it is keeping in mind the legislative intent and one has to apply the statute as it is, when it is clear and unambiguous. We must always presume that the legislature does not commit mistakes and it does not use superfluous words. We should always presume that the statute is constitutionally valid.

But reading a statute as is keeping in mind the legislative intent would create certain challenges as the legal language is complex and difficult to be understood. Today's world is rapidly changing one and hence to cope up with the changes, the law has to be amended then and there for providing fair justice. Reading the statute as is, i.e., during the time when enactment was made will be difficult to apply it to current scenario. For example, section 375 of IPC deals with rape, today offenders are trying new ways of doing that act which doesn't fall under the section. If we only stick with section, reading as it is, it would be very difficult to come to a conclusion and provide fair justice to the victim. Thus, the judges are required to interpret the law as situation demands, rather than reflecting what is there in the statute. In olden days the scenarios were different in comparison with the present day.

There were many eminent jurists who criticised this aspect of reading the statute as it is with the legislative intent. Let's briefly discuss some of them.

A German Philosopher, Gadamer stated that, statutory interpretation involves creative policy making by judges and not simply applying what is given in the statute. He further states that the interpreter was in history but interpretation is dynamic. For instance, let's take a classic work

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<sup>11</sup> (2002) 7 SCC 591

literature such as shakespeare's plays, and think about it. History tells us that the text is unchanging, but there can be variation in interpretation over time. To generate new meanings, each era might analyse a single game by means of various lenses and apply contemporaneous ideologies or culture contexts. The regular words on the page are unchanged, but lively interpretations reflect an evolution of views and values. The same applies to the law as well. The legislature has adopted a number of laws, their text continues to be the same but its application and interpretation changes over time in cases relating to modern technology. The dynamic nature of interpretation has to be demonstrated by courts, who need to dynamically adapt constitutional principles to new technological realities. Gadamer also claims that the text does not have a meaning until it has been interpreted. He claims that, without having applied the text to a specific problem, he does not understand it in abstract form.

Justice Holmes stated that he does not care about the legislative intent, he just wants to know what that law is." Holmes went on to explain that if we looked for intent, and read the law as it stands, then there would be an error because words have their own meaning independent of creator's motives. Rather than searching for a legislative intention, he suggested that the meaning of those words should be examined.

Justice Cardozo stated the effort to establish the legislative intent is a psychological one. In spite of this, if one friend writes a letter to another. which means that the receiver of both is very familiar with each other. letter finds it difficult to find the intention of the friend who wrote it in particular. Although the letter's receiver was aware of his friend's opinion, it is not clear why he has written a particular word. When that is the case of individual, how it is possible for the courts to find the intention of the legislature. In addition, one's thinking mind must always be the focus of the word intention with its psychological meanings. However, when the vote involves debates and dissenting opinions, it is not possible for a collective body such as an Assembly to have any intention at all. In such circumstances, where is the legislature's sole purpose? the courts are running after? asks Cardozo.

Gray stated that, under the assumption that the legislature has an intention in all the problems arising from the implementation of the law, the courts follow the intention-based interpretation of the law. However, it is impossible for the legislator to foresee all problems that may be faced

in future and have an intent of solving a hypothetical problem. In addition, Gray stated that what emerges from the court room is not a legislature's intention at all, but its own.

In Geny's judgment, all statutes shall be acts of social administration duly constituted and have the power to issue mandatory rules. Their particular characteristics are that they shall continue for as long as the authority remains in force without any specific restrictions on their duration. So, for the problems that are now being faced, where is the lawfulness of the former authority's intentions?

All these were the criticisms made by eminent jurist on intention-based methods.

### **Disadvantages of literal rule of interpretation**

In Literal rule of interpretation, the judges rely on the exact wording of the statute for the case. They don't interpret the meaning. They won't look beyond what has been stated. The literal rule is, Brett M.R. says, as a basic principle that if you are interpreting legislation or documents for the purposes of determining whether they should be construed in accordance with the usual general meaning of these words, but do not construe them without taking into account their normal everyday meanings regarding the matter to which they relate.

### **Let's critically examine this rule of interpretation with a help of case law**

In case of *R. v. Harris*<sup>12</sup> the accused bit the nose of the injured party. The statute stated that the offence was to stab or wound or cut. Under the literal rule, biting is not cutting, stabbing or wounding. Hence the defendant was not proven guilty. This case is a best example which says why one shouldn't always stick with the literal meaning of the words rather than examining it deeper. While implementing a law, the maker might have included words in a narrow scope. When the case so demands, the interpretation must have been done in a wider scope in order to provide fair justice. In this case as the word biting doesn't fall under the ambit of the section, the accused was not convicted. This says no answer for the affected victim. The statute should not be read as it is, it has to be read in accordance with the situation. In this case if the statute is read

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<sup>12</sup> (1836) 7C & 446

literally, then many might commit such type of offences in the future and say that it doesn't fall under the ambit of the statute. The judges should interpret the law so as to provide fair decision for both the sides.

We should understand the meaning of the statute rather than reflecting what is in it. For example, a toll means a definite payment exacted by the state or the local authority by virtue of sovereignty. There may be different kinds of toll such as toll through and toll traverse. Though tolls are of different kinds and be levied in situation, it ordinarily means the amounts which the government or local authority or a person duly authorized by the government may collect for passages of carriages and vehicles over a road or bridge.<sup>13</sup> Rather than construing what is in the statute, the interpretation could be keeping in mind the meaning of the statute.

One significant objection of this rule of interpretation is that the meanings of words can change over time, and hence literal interpretation results in unfairness. As a result, misleading precedents may be set.

### **Disadvantages of strict interpretation of statutes**

This interpretation would limit the power of judicial review to that language in the law. Here the judges are required to apply the text in question as it is, strictly interpreting this interpretation. They should adhere to the explicit meaning in a way that does not allow for wide interpretation or flexibility.

There are two types of statutes which comes strict interpretation: Penal Statute and Taxing Statute.

The penal laws should be strictly construed due to the enormous growth of crimes. But liberal interpretation can be used in the necessary times to uphold the spirit and objectives of the statute. If, however, strict interpretation is to be applied, it follows from a literal principle that the law must be interpreted by reference to the ordinary and natural nature of those words. In *Motibhai v. Prasad*<sup>14</sup> case it was stated that in its interpretation of the Criminal Code, the court should not

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<sup>13</sup> Hansraj and sons v. state of Jammu and Kashmir (2000) SC 2692

<sup>14</sup> (1970) SCC 559

attempt to supplement itself with new words. The judicial authorities are required to interpret the criminal laws in a literal manner.

In *Sakshi v. Union of India*<sup>15</sup> case it was held that other than those penetrations mentioned in Section 375 of IPC, other penetration cannot be included or added according to strict interpretation and therefore, in this case the accused used other forms of penetration not included in the section and hence he was acquitted. This means that by strictly construing, the courts are not strict with the accused. This may be an excuse for the accused that he may state “I did not rape the girl under any of penetrations mentioned in the section”. The court should use liberal interpretation in such a case so as to deviate from the literal words of the statute and stick with its meaning in order to provide fair justice.

Strict interpretation of the tax law, general rule is that when it comes to determining taxable persons they should be construed with utmost precision and do not make them subject to any taxation unless those words are explicitly levied upon them. Nevertheless, there may be loopholes in respect of which taxpayers are allowed to take advantage of technicality and circumvent taxation as a way contrary to the spirit of law when strict adherence to the literal wording of the legislation is observed. The changes in financial circumstances and commercial practices that lead to negative effects or lack of adaptability as regards application of the legislation would not be taken into account by a rigid reading.

A harmonious balance of the precision that literalism offers and the need to be flexible in today's changing legal, societal or technological landscape is a key element for efficient legislative interpretation. In order to ensure that the continues to be both rigorous and flexible, able to meet the needs of contemporary societies, such a delicate balance is essential.

### **Conclusion:**

As we conclude this exploration into the dichotomy of legal certainty and textual rigidity in interpreting statutes literally, the tapestry of benefits and drawbacks unfolds a narrative that transcends rigid dichotomies. Literal interpretation expands its complexity while providing a baseline for legal certainty, showing potential weaknesses in adapting to the changes of today's

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<sup>15</sup> (2004) SCC 449

dynamic society.

The conclusion reached is not the final verdict, but an encouragement for a more balanced point of view. It calls on legal scholars and practitioners to deal with the tension between certainty and flexibility in a thoughtful way. In order to accommodate the ever-changing needs of justice, a measured recalibration is necessary in order to overcome the rigidity that characterises literal interpretation while providing clarity.

This Article suggests that, instead of accepting literalism's merits without ceding to its possible limits, the judicial community should be an architect of a flexible framework. Rather than a static opposition, the interaction between certainty and adaptability has been transformed into a dynamic dialogue. The conclusion is, in principle, a call to legal professionals to be good interpreters and weaving together the strands of certainty and flexibility into a tapestry that reflects the spirit of law. This has the effect of encouraging a continuous conversation within the legal community, cooperation to improve the interpretation of law and its ability to cope with an ever-evolving society's evolving needs, thereby preserving not only legislation as a beacon of certainty but also one that can be resilient enough for dealing with new challenges.

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