

The Journey of Amendments of the Constitutions of India: 1950 to 2013

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Abstract: Amendments of the Indian Constitution have been done for the purpose of variation, addition or cancellation of any provision made in the constitution. Since the enactment of the Constitution of India on 26th November 1949, there have been 98 amendments made to it till 2013. Numbers of Bills are introduced before Lok Sabha and Rajya Sabha for further improving the Constitution. Parliament has been bestowed with the constituent power, using which changes in the Indian Constitution can be made. However, the basic structure of the Indian Constitution cannot be changed under any circumstances. In case any amendment violates the basic structure of constitution, it should be revised and changed. The researcher has tried to identify and give a synoptic review of amendments of Constitution of India from 1950 to 2013.

Keywords: Constitution, Constitution Amendment, Fundamental Right, Act of Amendment, Article, Part,

Introduction: Constitutions concern different levels of organizations, from sovereign states to companies and unincorporated associations. A treaty which establishes an international organization is also its constitution, in that it would define how that organization is constituted. Within states, whether sovereign or federated, a constitution defines the principles upon which the state is based, the procedure in which laws are made and by whom. Some constitutions, especially codified constitutions, also act as limiters of state power, by establishing lines which a state's rulers cannot cross, such as fundamental rights. These rules together make up, i.e. *constitute*, what the entity is. When these principles are written down into a single document or set of legal documents, those documents may be said to embody a *written* constitution; if they are written down in a single comprehensive document, it is said to embody a *codified* constitution. The journey of amendments starts from 1949 and Act was enacted from 1950. The researcher has studied the all amendments during the period 1950 to 2013.

Definition and Meaning of Constitution There are several definitions of Constitution; some of important definitions are "A Constitution is a set of fundamental principles or established precedents according to which a state or other organization is governed" (Oxford American Dictionary, 2005). The purpose of a constitution is to explain how sovereign power is distributed amongst the government and people as well as to delegated bodies. The meaning of the word 'Constitution' is, "The act or process of composing, setting up, or establishing" (Free Online Dictionary, 2013).

The Constitution of India: The Constitution of India is the longest written constitution of any sovereign country in the world, (Pylee, 1997) containing 450 articles, (Sarkar: 363 and Kashyap: 3) 12 schedules and 115 amendments, with 117,369 words in its English-language translation, (Constitution of India, 2008) while the United States Constitution is the shortest written constitution, at 7 articles and 27 amendments (National Constitution Center, 2013).

Amendment of the Constitution of India: A constitutional amendment is a formal change to the text of the written constitution of a nation or state. In some jurisdictions the text of the constitution itself is altered; in others the text is not changed, but the amendments change its effect. Amendment of the Constitution of India is the process of making changes to the nation's fundamental law or supreme law. The procedure of amendment in the constitution is laid down in Part XX (Article 368) of the Constitution of India. This procedure ensures the sanctity of the Constitution of India and keeps a check on arbitrary power of the Parliament of India. (Padmanabhan, 2000) However, there is another limitation imposed on the amending power of the constitution of India. There has been a conflict between the Supreme Court and Parliament, where Parliament wants to exercise discretionary use of power to amend the constitution while the Supreme Court wants to restrict that power. This has led to the laying down of various doctrines or rules in regards to checking the validity/legality of an amendment, the most famous among them is the Basic structure doctrine as laid down by the Supreme Court in the case of *Kesavananda Bharati v. State of Kerala*.

Procedure for Amendment A proposed amendment begins in Parliament where it is introduced as a bill.

It must then be approved by each House of Parliament. In each house, to amend the Constitution, a majority of the total membership of the House and a majority of not less than two-thirds of the members present and voting is required in each House of Parliament. Certain amendments must then also be ratified by the legislatures of at least one-half of the states. Once all other stages have been completed, an amendment is bound to receive the assent of the President of India. Also in case of Constitutional Amendment bill, there is no provision of joint sitting of both houses. Despite the super majority requirement in the Constitution, it is one of the most frequently amended governing documents in the world; amendments have averaged about two a year. This is partly because the Constitution is so specific in spelling out government powers that amendments are often required to deal with matters that could be addressed by ordinary statutes in other democracies. As a result, it is the longest constitution of any sovereign nation in the world. It currently consists of over 117,369 words (450 articles plus 115 amendments). Every constitutional amendment is formulated as a statute. The first amendment is called the Constitution (First Amendment) Act, the second, the Constitution (Second Amendment) Act, and so forth. There is total 98th Amendment Act formulated till up to 2013. Each usually has the long title an Act further to amend the Constitution of India.

Limitations There are certain limitation for amendments, it should not violet the original Constitution. The Indian Supreme Court first struck down a constitutional amendment in 1967, ruling in the case of *I.C. Golak Nath and Ors. vs. State of Punjab and Anr.* An amendment was struck down on the basis that it violated Article 13. The State shall not make any law which takes away or abridges the rights conferred by the charter of Fundamental Rights. The term law in this article was interpreted as including a constitutional amendment. Parliament responded by enacting the twenty-fourth Amendment of the Constitution of India which declared that nothing in Article 13 shall apply to any amendment of this Constitution. (Pylee, 1997) The current limitation on amendments comes from *Kesavananda Bharati v. The State of Kerala* where the Supreme Court ruled that amendments of the constitution must respect the basic structure of the constitution and certain fundamental features of the constitution cannot be altered by amendment. Parliament attempted to remove this limitation by enacting the Forty-second Amendment, which declared, among other provisions, that there shall be no limitation whatever on the constituent power of Parliament to amend this Constitution. However, this change was itself later declared invalid by the Supreme Court in *Minerva Mills v. Union of India*. **Reasons for amendments to the Constitution:** The most important and frequent reason for amendments to the Constitution are fundamental rights, territorial changes, transitional provisions, democratic reform, today’s need of nation, and increase unity and the strength of the nation.

Constitution Amendments (1950-2013): A Synoptic Review Regarding the Constitution amendments Pandit Nehru clearly stated, “While one wants this Constitution to be as solid and permanent as we can make it, there is no permanence in the Constitution. There should be certain flexibility. If you make anything rigid and permanent, you stop the nation’s growth, the growth of a living vital organic people. While the world is in turmoil and we are passing through a swept period of transition, what we may do today may not be wholly applicable tomorrow”. As of May 2013, there have been 98 amendments to the Constitution of India since it was first enacted in 1950. The objective behind the amendment of the Constitution and its date of enforcement is given in synoptic review. The Table-1 shows the synoptic review of Constitution amendments from 1950 to 2013.

Table-1: Synoptic Review of Constitution Amendments from 1950 to 2013.

Amend ment Number	Amendment of the Articles, Schedules & Parts	Insert/ Remove Articles & Schedule	Date of Enforc ement	Objectives
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1 st	Amend Articles 15, 19, 85, 87, 174, 176, 341, 342, 372 & 376.	Insert Articles 31A & 31B. Insert schedule 9	18 th June 1951	To fully secure the constitutional validity of zamindari abolition laws & to place reasonable restriction on freedom of speech.
2 nd	Amend Article 81	-	1 st May 1953	A technical amendment to fix the size of each parliamentary constituency between 650,000 & 850,000 voters.
3 rd	Amend schedule 7	-	22 nd Feb. 1955	Limits maximum no of seats in lok sabha up to 500.
4 th	Amend articles 31, 35 B & 305. Amend schedule 9.	-	27 th April 1955	Restrictions on property rights & inclusion of related bills in Schedule 9 of the constitution
5 th	Amend article 3	-	24 th Dec. 1955	Provide for a consultation mechanism with concerned states in matters relating to the amendments to the territorial matters & in the renaming of the state
6 th	Amend articles 269 & 286. Amend schedule 7	-	11 th Sept. 1956	Amend the Union & State Lists with respect to raising of taxes
7 th	Amend articles 1, 49, 80, 81, 82, 131, 153, 158, 168, 170, 171, 216, 217, 220, 222, 224, 230, 231 & 232. Amend part 8. Amend schedules 1, 2, 4 & 7.	Insert articles 258A, 290A, 298, 350A, 350B, 371, 372A & 378A	1 st Nov. 1956	Reorganization of states on linguistic lines, abolition of Class A, B, C, D states & introduction of Union Territories
8 th	Amend article 334	-	5 th Jan. 1960	Clarify state's power of compulsory acquisition & requisitioning of private property & include Zamindari abolition laws in Schedule 9 of the constitution
9 th	Amend schedule 1	-	28 th Dec. 1960	Minor adjustments to territory of Indian Union consequent to agreement with Pakistan for settlement of disputes by demarcation of border villages, etc.
10 th	Amend article 240. Amend schedule 1	-	11 th Aug. 1961	Incorporation of Dadra, Nagar & Haveli as a Union Territory, consequent to acquisition from Portugal
11 th	Amend articles 66 & 71	-	19 th Dec. 1961	Election of Vice President by Electoral College consisting of members of both Houses of Parliament, instead of election by a Joint Sitting of Parliament.
12 th	Amend article 240. Amend schedule 1	-	20 th Dec. 1961	Incorporation of Goa, Daman & Diu as a Union Territory, consequent to acquisition from Portugal
13 th	Amend part 21	-	1 st Dec. 1963	Formation of State of Nagaland with special protection under Article 371A
14 th	Amend articles 81 & 240. Insert article 239A. Amend schedules 1 & 4	-	28 th Dec. 1962	Incorporation of Pondicherry into the Union of India & creation of Legislative Assemblies for Himachal Pradesh, Tripura, Manipur & Goa

15 th	Amend articles 124, 128, 217, 222, 224, 226, 297, 311 & 316. Amend schedule 7	Insert article 224A.	5 th October 1963	Raise retirement age of judges from 60 to 62 & other minor amendments for rationalizing interpretation of rules regarding judges etc.
16 th	Amend articles 19, 84 & 173. Amend schedule 3	-	5 th October 1963	Make it obligatory for seekers of public office to swear their allegiance to the Indian Republic & prescribe the various obligatory templates.
17 th	Amend article 31A. Amend schedule 9	-	20 th June 1964	To secure the constitutional validity of acquisition of Estates & place I& acquisition laws in Schedule 9 of the constitution
18 th	Amend article 3	-	27 th Aug. 1966	Technical Amendment to include Union Territories in Article 3 & hence permit reorganization of Union Territories
19 th	Amend article 324	-	11 th Dec. 1966	Abolish Election Tribunals & enable trial of election petitions by regular High Courts
20 th	-	Insert article 233A	22 nd Dec. 1966	Indemnify & validate judgments, decrees, orders & sentences passed by judges & to validate the appointment, posting, promotion & transfer of judges barring a few who were not eligible for appointment under article 233.
21 st	Amend schedule 8		10 th April 1967	Include Sindhi as an Official Language
22 nd	Amend article 275	Insert articles 244A & 371B	25 th Sept. 1969	Provision to form Autonomous states within the State of Assam
23 rd	Amend articles 330, 332, 333 & 334	-	23 rd Jan. 1970	Extend reservation for SC/ST & nomination of Anglo Indian members in Parliament & State Assemblies for another 10 years i.e. up to 1980
24 th	Amend articles 13 & 368	-	5 th Nov. 1971	Enable parliament to dilute fundamental rights through amendments to the constitution
25 th	Amend article 31	Insert article 31C	20 th April 1972	Restrict property rights & compensation in case the state takes over private property
26 th	Amend article 366	Insert article 363A. Remove article 291 & 362	28 th Dec. 1971	Abolition of privy purse paid to former rulers of princely states which were incorporated into the Indian Republic
27 th	Amend articles 239A & 240.	Insert articles 239B & 371C	15 th Feb. 1972	Reorganization of Mizoram into a Union Territory with a legislature & council of ministers
28 th	-	Insert article 312A. Remove article 314.	29 th Aug. 1972	Rationalize Civil Service rules to make it uniform across those appointed prior to Independence & post-independence
29 th	Amend schedule 9	-	9 th June 1972	Place land reform acts & amendments to these act under Schedule 9 of the constitution
30 th	Amend article 133	-	27 th Feb. 1973	Change the basis for appeals in SC of India in case of Civil Suits from value criteria to one involving substantial question of law

31 st	Amend articles 81, 330 & 332	-	17 th Oct. 1973	Increase size of Parliament from 525 to 545 seats. Increased seats going to the new states formed in North East India & minor adjustment consequent to 1971 Delimitation exercise
32 nd	Amend article 371. Amend schedule 7	Insert articles 371D&371E.	1 st July 1974	Protection of regional rights in Telengana & Andhra regions of State of Andhra Pradesh
33 rd	Amend articles 101 & 190	-	19 th May 1974	Prescribes procedure for resignation by members of parliament & state legislatures & the procedure for verification & acceptance of resignation by house speaker
34 th	Amend schedule 9	-	7 th Sep. 1974	Place land reform acts & amendments to these act under Schedule 9 of the constitution
35 th	Amend articles 80 & 81	Insert article 2A. Insert schedule 10	1 st March 1975	Terms & Conditions for the Incorporation of Sikkim into the Union of India
36 th	Amend articles 80 & 81. Amend schedules 1 & 4.	Insert article 371F. Remove article 2A & schedule 10	26 th April 1975	Formation of Sikkim as a State within the Indian Union
37 th	Amend articles 239A & 240	-	3 rd May 1975	Formation of Arunachal Pradesh legislative assembly
38 th	Amend articles 123, 213, 239B, 352, 356, 359 & 360	-	1 st Aug. 1975	Enhances the powers of President & Governors to pass ordinances
39 th	Amend articles 71 & 329. Amend schedule 9	Insert article 329A.	10 th Aug. 1975	Amendment designed to negate the judgment of Allahabad High Court invalidating Prime Minister Indira Gandhi's election to parliament.
40 th	Amend article 297. Amend schedule 9	-	27 th May 1976	Enable Parliament to make laws with respect to Exclusive Economic Zone & vest the mineral wealth with Union of India Place I& reform & other acts & amendments to these act under Schedule 9 of the constitution
41 st	Amend article 316	-	7 th Sep. 1976	Raise Retirement Age Limit of Chairmen & Members of Union & State Public Commissions from sixty to sixty two.
42 nd	Amend articles 31, 31C, 39, 55, 74, 77, 81, 82, 83, 100, 102, 103, 105, 118, 145, 150, 166, 170, 172, 189, 191, 192, 194, 208, 217, 225, 226, 227, 228, 311, 312, 330, 352, 353, 356, 357, 358, 359, 366, 368 & 371F. Amend schedule 7	Insert articles 31D, 32A, 39A, 43A, 48A, 131A, 139A, 144A, 226A, 228A & 257A. Insert parts 4A & 14A.	1 st April 1977	Amendment passed during internal emergency by Indira Gandhi. Provides for curtailment of fundamental rights, imposes fundamental duties & changes to the basic structure of the constitution by making India a Socialist Secular Republic
43 rd	Amend articles 145, 226, 228 & 366	Remove articles 31D, 32A, 131A, 144A, 226A & 228A	13 th April 1978	Amendment passed after revocation of internal emergency in the Country. Repeals some of the more 'Anti-Freedom' amendments enacted through Amendment Bill 42

44 th	Amend articles 19, 22, 30, 31A, 31C, 38, 71, 74, 77, 83, 103, 105, 123, 132, 133, 134, 139A, 150, 166, 172, 192, 194, 213, 217, 225, 226, 227, 239B, 329, 352, 356, 358, 359, 360 & 371F. Amend part 12. Amend schedule 9	Insert articles 134A & 361A Remove articles 31, 257A & 329A.	6 th Sep t. 1979	Amendment passed after revocation of internal emergency in the Country. Provides for human rights safeguards & mechanisms to prevent abuse of executive & legislative authority. Annuls some Amendments enacted in Amendment Bill 42
45 th	Amend article 334	-	25 th Jan. 1980	Extend reservation for SC / ST & nomination of Anglo Indian members in Parliament & State Assemblies for another ten years i.e. up to 1990
46 th	Amend articles 269, 286 & 366. Amend schedule 7	-	2 nd Feb. 1983	Amendment to negate judicial pronouncements on scope & applicability on Sales Tax
47 th	Amend schedule 9	-	26 th Aug. 1984	Place I & reform acts & amendments to these act under Schedule 9 of the constitution
48 th	Amend article 356	-	1 st April 1985	Article 356 amended to permit President's rule up to two years in the state of Punjab
49 th	Amend article 244. Amend schedules 5 & 6	-	11 th Sept. 1984	Recognize Tripura as a Tribal State & enable the creation of a Tripura Tribal Areas Autonomous District Council
50 th	Amend article 33	-	11 th Sept. 1984	Technical Amendment to curtailment of Fundamental Rights as per Part III as prescribed in Article 33 to cover Security Personnel protecting property & communication infrastructure
51 st	Amend articles 330 & 332	-	16 th June 1986	Provide reservation to Scheduled Tribes in Nagaland, Meghalaya, Mizoram & Arunachal Pradesh Legislative Assemblies
52 nd	Amend articles 101, 102, 190 & 191.	Insert schedule 10	1 st March 1985	Anti-Defection Law - Provide disqualification of members from parliament & assembly in case of defection from one party to other
53 rd	-	Insert article 371G	20 th Feb. 1987	Special provision with respect to the State of Mizoram.
54 th	Amend articles 125 & 221. Amend schedule 2	-	1 st April 1986	Increase the salary of Chief Justice of India & other Judges & to provide for determining future increases without the need for constitutional amendment
55 th	-	Insert article 371H	20 th Feb. 1987	Special powers to Governor consequent to formation of state of Arunachal Pradesh
56 th	-	Insert article 371I	30 th May 1987	Transition provision to enable formation of state of Goa
57 th	Amend article 332	-	21 st Sept. 1987	Provide reservation to Scheduled Tribes in Nagaland, Meghalaya, Mizoram & Arunachal Pradesh Legislative Assemblies

58 th	Amend part 22.	Insert article 394A	9 th Dec . 1987	Provision to publish authentic Hindi translation of constitution as on date & provision to publish authentic Hindi translation of future amendments
59 th	Amend article 356	Insert article 359A	30 th March 1988	Article 356 amended to permit President's rule up to three years in the state of Punjab, Articles 352 & Article 359A amended to permit imposing emergency in state of Punjab or in specific districts of the state of Punjab
60 th	Amend article 276	-	20 th Dec. 1988	Profession Tax increased from a maximum of Rs. 250/- to a maximum of Rs. 2500/-
61 st	Amend article 326	-	8 th Mar .1989	Reduce age for voting rights from 21 to 18
62 nd	Amend article 334	-	20 th Dec. 1989	Extend reservation for SC/ST & nomination of Anglo Indian members in Parliament & State Assemblies for another ten years i.e. up to 2000
63 rd	Amend article 356	Remove article 359A	6 th Jan. 1990	Emergency powers applicable to State of Punjab, accorded in Article 359A as per amendment 59 repealed
64 th	Amend article 356	-	16 th April 1990	Article 356 amended to permit President's rule up to three years & six months in the state of Punjab
65 th	Amend article 338	-	12 th March 1990	National Commission for Scheduled Castes & Scheduled Tribes formed & its statutory powers specified in The Constitution.
66 th	Amend schedule9	-	7 th June 1990	Place land reform acts & amendments to these act under Schedule 9 of the constitution
67 th	Amend article 356	-	4 th Oct. 1990	Article 356 amended to permit President's rule up to four years in the state of Punjab
68 th	Amend article 356	-	12 th March 1991	Article 356 amended to permit President's rule up to five years in the state of Punjab
69 th	-	Insert articles 239AA & 239AB	1 st Feb. 1992	To provide for a legislative assembly & council of ministers for Federal National Capital of Delhi. Delhi continues to be a Union Territory
70 th	Amend articles 54 & 239AA	-	21 st Dec. 1991	Include National Capital of Delhi & Union Territory of Pondicherry in electoral college for Presidential Election
71 st	Amend schedule8	-	31 st Aug. 1992	Include Konkani, Manipuri & Nepali as Official Languages
72 nd	Amend article 332	-	5 th Dec . 1992	Provide reservation to Scheduled Tribes in Tripura State Legislative Assembly
73 rd	-	Insert part 9	24 th April 1993	Statutory provisions for Panchayat Raj as third level of administration in villages
74 th	-	Insert part 9A	1 st June 1993	Statutory provisions for Local Administrative bodies as third level of administration in urban areas such as towns & cities

75 th	Amend article 323B	-	15 th May 1994	Provisions for setting up Rent Control Tribunals
76 th	Amend schedule9	-	31 st Aug. 1994	Enable continuance of 69% reservation in Tamil Nadu by including the relevant Tamil Nadu Act under 9th Schedule of the constitution
77 th	Amend article 16	-	17 th June 1995	A technical amendment to protect reservation to SC/ST Employees in promotions
78 th	Amend schedule9	-	30 th Aug. 1995	Place I& reform acts & amendments to these act under Schedule 9 of the constitution
79 th	Amend article 334	-	25 th Jan. 2000	Extend reservation for SC / ST & nomination of Anglo Indian members in Parliament & State Assemblies for another ten years i.e. up to 2010
80 th	Amend articles 269 & 270	Remove article 272	9 th June 2000	Implement Tenth Finance Commission recommendation to simplify the tax structures by pooling & sharing all taxes between states & The Centre
81 st	Amend article 16	-	9 th June 2000	Protect SC/ST reservation in filling backlog of vacancies
82 nd	Amend article 335	-	8 th Sept. 2000	Permit relaxation of qualifying marks & other criteria in reservation in promotion for SC / ST candidates
83 rd	Amend article 243M	-	8 th Sept. 2000	Exempt Arunachal Pradesh from reservation for Scheduled Castes in Panchayati Raj institutions
84 th	Amend articles 55, 81, 82, 170, 330 & 332	-	21 st Feb. 2002	Extend the usage of 1991 national census population figures for state wise distribution of parliamentary seats
85 th	Amend article 16	-	4 th Jan. 2002	A technical amendment to protect seniority in case of promotions of SC/ST Employees
86 th	Amend articles 45 & 51A.	Insert article 21A	12 th Dec. 2002	Provides Right to Education until the age of fourteen & Early childhood care until the age of six
87 th	Amend articles 81, 82, 170 & 330	-	22 nd June 2003	Extend the usage of 2001 national census population figures for state wise distribution of parliamentary seats
88 th	Amend article 270. Amend schedule 7.	Insert article 268A.	15 th Jan. 2004	To extend statutory cover for levy & utilization of Service Tax
89 th	Amend article 338.	Insert article 338A	28 th Sept. 2003	The National Commission for Scheduled Castes & Scheduled Tribes was bifurcated into The National Commission for Scheduled Castes & The National Commission for Scheduled Tribes
90 th	Amend article 332	-	28 th Sept. 2003	Reservation in Assam Assembly relating to Bodoland Territory Area
91 st	Amend articles 75 & 164. Amend schedule10	Insert article 361B	1 st Jan. 2004	Restrict the size of council of ministers to 15% of legislative members & to strengthen Anti Defection laws

92 nd	Amend article 270 Amend schedules 7 & 8.	Insert article 268A	7 th Jan. 2004	Enable Levy of Service Tax & Include Bodo, Dogri, Santali & Maithili as Official Languages
93 rd	Amend article 15	-	20 th Jan. 2006	To enable provision of reservation for other backward classes (OBC) in government as well as private educational institutions
94 th	Amend article 164	-	12 th June 2006	To provide for a Minister of Tribal Welfare in newly created Jharkhand & Chhattisgarh States
95 th	Amend article 334	-	25 th Jan. 2010	To extend the reservation of seats for SCs & STs in the Lok Sabha & states assemblies from Sixty years to Seventy years
96 th	Amend schedule 8	-	23 rd Sept. 2011	Substituted Odia for Oriya
97 th	Amend Art 19	Added Part IX B	12 th Jan. 2012	The amendment objective is to encourage economic activities of cooperatives which in turn help progress of rural India. It is expected to not only ensure autonomous & democratic functioning of cooperatives, but also the accountability of the management to the members & other stakeholders.
98 th		Insert Article 371J in the Constitution	2 nd Jan. 2013	To empower the Governor of Karnataka to take steps to develop the Hyderabad-Karnataka Region.

(Source: Computed from various government reports and literature)

Conclusions: It is observed that, "This variety in the amending process is wise but is rarely found". The process of amendment is a dynamic one. It does not stop the growth of a nation. Indian Constitution is a balanced Constitution. The framers of the Constitution desired to secure balance and moderation in incorporating various provisions in our Constitution. As far as the amendment of the Constitution is concerned, a balance is struck in making the Constitution partly rigid and partly flexible. It was found that, in spite of 98 amendments done from 1950 to 2013 so far in the Constitution, there is still needs to be done amendments regarding the problems relating to land reforms, unemployment, literacy, Women and child labour. It is seen that there are two types of Constitution one is a flexible Constitution and other is rigid Constitution. The amendments in flexible Constitution is easy than the rigid Constitution. It was found that, the framers of the Indian Constitution did not go to the extreme. They incorporated a unique procedure of amendment which combines both rigidity and flexibility. Therefore it was concluded that, Article 368 of Indian Constitution plays an important role in the amendment of the Constitution.

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