INDIALAW



FAMILY LAW

Supreme Court Closes Gaps in Anand Marriage Act, Orders Uniform Rules Across States

AUTHOR Nidhi Singh

PUBLISHED 19 September 2025

Introduction

The Supreme Court of India in Amanjot Singh Chadha v. Union of India & Ors.[1] has delivered a landmark judgment addressing a long-standing gap in the operationalisation of the Anand Marriage Act, 1909, as amended in 2012. The Court directed all States and Union Territories to frame rules for the registration of Sikh marriages solemnised through Anand Karaj within a fixed timeframe and ensured interim arrangements for non-discriminatory registration until such rules are notified.

This judgment carries significant constitutional, social, and legal implications, particularly for equal treatment of religious communities, protection of women's and children's rights, and the orderly functioning of civil administration.

Table of contents

- Introduction
- Background
- The Court's Constitutional Lens
- Directions Issued
- Guiding Principles
- Special Directions
- Broader Impact of the Judgment
- Conclusion

Background

The Anand Marriage Act, 1909 was enacted to recognise the validity of marriages solemnised through the Sikh religious ceremony known as Anand Karaj. However, the statute initially lacked a framework for registration.

To address this, Parliament amended the Act in 2012 and introduced Section 6, which:

- Directed State Governments to frame rules for registering Anand Karaj marriages.
- Required maintenance of a Marriage Register and issuance of certified extracts.
- Clarified that failure to register would not affect the validity of such marriages.
- Provided that once registered under the Act, no further registration under other laws would be necessary.

Despite this mandate, several States and Union Territories failed to notify the required rules. This created inconsistencies, as some jurisdictions enabled registration while others did not, leaving Sikh couples without a uniform route to obtain marriage certificates, documents essential for succession, inheritance, maintenance, insurance claims, and enforcement of matrimonial rights.

The Court's Constitutional Lens

Petitioner Amanjot Singh Chadha approached the Supreme Court under Article 32 of the Constitution, seeking enforcement of the statutory obligation under Section 6. He argued that non-implementationof Section 6 deprived Sikh couples of equal access to civil entitlements. Prior to this, he had filed a PIL in the Uttarakhand High Court in 2021, which had issued limited directions to the State. In 2022, representations were made to several States and UTs seeking rule-making. While some responded, many remained inactive, prompting the petitioner to approach the Supreme Court under Article 32.

The relief sought was narrowly tailored: a mandamus directing States and Union Territories to frame rules under Section 6 within a reasonable time, and interim facilitation of registration until such rules were notified.

A Bench of Justice Vikram Nath and Justice Sandeep Mehta upheld the petitioner's plea and made several key observations:

1. **Mandatory Duty:** Section 6 creates a positive and binding obligation on every State Government to establish a workable registration mechanism with a time period of 4 months from date of the judgment.
2. **Interim Registration:** With immediate effect, and until such rules are notified, all States and Union Territories must ensure that marriages solemnised by Anand Karaj are received for registration under the existing marriage-registration framework. Where requested, the certificate must specify that the marriage was solemnised by the Anand Karaj rite.

3. **Clarificatory Circulars:** States and Union Territories that already have rules in place must continue operating them. Within three months, they must issue circulars clarifying applicable forms, fees, documents required, and timelines, and ensure availability of certified extracts under Section 6(2).
4. **No Duplicate Registration:** Authorities shall not insist on an additional or duplicative registration under any other law once registration under the Anand Marriage Act is completed, in line with Section 6(5).
5. **Nodal Officers:** Every State and Union Territory must designate a Secretary-level Nodal Officer within two months to oversee compliance with the Court's order, issue administrative directions, and address grievances regarding registration and certification.
6. **Union Government's Role:** The Union of India shall act as the coordinating authority. Within two months, it must circulate model rules to States/UTs. Within six months, it must compile and publish a consolidated compliance report on the Ministry of Law and Justice website, and submit it to the Supreme Court Registry.

Directions Issued

Guiding Principles

- Validity v. Certification: Anand Karaj marriages are valid irrespective of registration, but certification provides essential proof for succession, inheritance, maintenance, insurance, and other civil entitlements.
- Equal Access: Lack of uniform registration across States/UTs results in discrimination, undermining constitutional equality.
- Protection of Women and Children: Registration particularly safeguards women and children who depend on documentary proof to enforce their rights.
- Non-Discrimination Principle: In a secular framework, the State must ensure that a citizen's faith is neither an advantage nor a handicap in accessing civil rights.
- Federal Sensitivity: While general directions apply nationwide, Goa and Sikkim were given tailored orders in light of their distinct constitutional and statutory frameworks.

Special Directions

For Goa: All Civil Registration Offices must immediately process Anand Karaj marriage registrations under the existing civil framework. The Union must extend the Anand Marriage Act, 1909 to Goa within four months under the Goa, Daman and Diu (Administration) Act, 1962. Goa must frame and notify rules under Section 6 within four months of the Act's extension.

For Sikkim: Registrations must be processed under the existing 1963 Rules for marriages until new rules are framed. The Union must initiate steps within four months to extend the Anand Marriage Act, 1909 to Sikkim under Article 371F(n) of the Constitution. Sikkim must notify rules under Section 6 within four months after such extension.

Broader Impact of the Judgment

The ruling brings certainty for Sikh couples by ensuring uniform access to marriage certification nationwide. It strengthens protections for women and children who depend on documentary proof of marital status, and it underscores that statutory mandates cannot be indefinitely ignored by State authorities. At the same time, the Court balanced federal concerns by tailoring directions for Goa and Sikkim, while reaffirming India's secular principle that faith should not determine access to civil rights.

Conclusion

By mandating time-bound rule-making and interim facilitation, the Supreme Court has translated the Anand Marriage Act's promise into practice. The judgment stands as a reminder that laws enacted by Parliament must be effectively implemented and that constitutional equality requires both recognition and enforcement in everyday governance.

For more details, write to us at: contact@indialaw.in

[1] 2025 INSC 1127

Related Practice Areas