

BABRI MAZID: REVISIT ON COMMUNAL VIOLENCE

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ABSTRACT

India was once a group of 565 independent princely state rich in social composition with a number of religions at the time of independence when the constitution was being written by the constituent assembly it was important to declare India as a secular country for peace and integrity within this 565 princely states secularism has always been the most important feature of the Constitution of India but when there are so many religions living on the same piece of land, disputes are bound to happen. As happened on 6th December 1992 when Babri Masjid was demolished at Ayodhya. The political agenda can be clearly seen behind the Babri Masjid Ram Janmabhoomi case as the dispute took fire in around 1984 when Vishva Hindu Parishad (VHP) wanted to claim the land as Ram Janmabhoomi. This article discusses about the history of Babri Masjid, the facts and figures used by Supreme Court in his decision. Prior judgement from various Courts. How political parties use religion in their election campaign and how communal riots can cause destruction all around the country. It further discusses the constitutional aspects of the Babri Mazid Case.

KEYWORDS– Babri Mazid, Religion, Politics, Ownership, Possession

.HISTORICAL BACKGROUND

Babri Masjid was situated in Ayodhya, a place in Uttar Pradesh, India. Vishva Hindu Parishad along with BJP as a political face started a movement for construction of a temple of Hindu deity Lord Rama implementing which a mob of VHP activists illegally carried out the demolition of Babri Masjid (a mosque) built by Mir Baqi, a Mughal general, in the 16th century.⁵⁷⁷

The activists called themselves "kar sevaks" and justified their doing by stating that the mosque was built on the ruins of an ancient Ram Temple. In the history of Supreme Court's judgements Babri Masjid demolition case is the second longest case for which the hearing went

on for 40 days.⁵⁷⁸ The History of Babri Masjid demolition case is around 500 years old as it starts from 1528 when it was constructed on the orders from Babur's commander Mir Baqi (The founder and establisher of Mughal Dynasty in India after defeating Ibrahim Lodhi in the first battle of Panipat) the locals of that area believed that a former Hindu temple existed there which was abolished for the construction of masjid which led to communal clashes between Hindus and Muslims between 1853 to 1859.⁵⁷⁹ The British government then came up with the solution that included division of land between Hindu and Muslim to resolve the dispute. During this division Hindu's were given

⁵⁷⁷ A. K Roy, *Destruction of Babri Masjid*, 27 EPW 2618, 2618(1992).

⁵⁷⁸ Ratnagar, Shereen, *Archaeology at the Heart of a Political Confrontation: The Case of Ayodhya*, 45 CURR ANTHROPOLOGICAL 230, 239–259 (2004).

⁵⁷⁹ P A Sebastian, *Secularism, and the Indian Judiciary*, 45 EPW 50, 50 (2010).

the outer area and Muslim's the inner for worshipping their idols.⁵⁸⁰

In around 1885, Mahant Raghubir Das filed a petition in the district court of Faizabad asking permission for the construction of a canopy on the exterior of Babri Masjid for Hindus to offer their prayers, but the petition was rejected by the court. Later in 1949, an idol of Hindu deity Rama was placed in the central dome which led to an increase in the disputes to control the situation government restricted the use of the disputed area. Afterwards many civil cases were filed by different parties.⁵⁸¹

In 1950, Gopal Simla Visharad files a case under right to worship for Hindus; Paramahansa Ramachandra Das files a petition for upkeep of idols and continuation of worship. Further in 1959, Nirmohi Akhara files cases for the proprietary rights of the disputed land and in 1961, UP Sunni Central Waqf Board files a case seeking possession of the site.⁵⁸²

In 1986, Court of Faizabad passed a judgement allowing Hindus to worship inside the temple. In protest of this judgement Babri Masjid Action Committee was formed and another case was filed in 1989 by the name of Ram Lalla Virajman seeking for proprietary rights of the disputed area in 1990 former Deputy Prime Minister of India Lal Krishna Advani also the co-founder and a senior leader of Bharatiya Janata Party started a Rath yatra from Somnath in Gujarat to Ayodhya in UP which leads to his arrest in Bihar in protest of which BJP withdraws its support from VP Singh's government. As a result of the increasing tensions UP government took control over the disputed land.⁵⁸³

On 6 December 1992, thousands of karsevaks demolished Babri Masjid and laid the Foundation stone for Ram Mandir which

increased communal riots all over India.⁵⁸⁴ On 16th December 1992, Librahan Commission was formed to investigate the matters regarding people responsible for the demolition of the Mazid. The central governments seized an area of 68 acres along with the disputed area under **Ayodhya Acquisition Act, 1993**⁵⁸⁵ which was challenged by Allahabad High Court. Based on the petitions and the question of whether former Hindu temple existed on the disputed land made by the president of India under **Article 143**⁵⁸⁶ of the Constitution bench held the abatement of pending suits as unconstitutional under **Section 4(3)**⁵⁸⁷ titled under **Dr M Ismail Faruqui v. Union of India**.⁵⁸⁸ Communal riots took place in Bombay followed by hundreds of deaths due to serial bomb blast. The central government (congress) was of the view to build a temple, Mazid, library, and hospital on the disputed land which was strongly opposed by BJP.⁵⁸⁹

In 2002, BJP became Central government with Prime minister Atal Bihari Vajpayee and started a department with Shatrughan Singh as its head to resolve the decades-old issue. Communal riots increased in Gujarat which led to the Godhara train attack killing and injuring many people. A three-judge bench was constituted on April 2002 in Allahabad High Court which Justice Sudhir Agrawal, Justice Sibghat Ullah Khan and Justice D V Sharma in which Archaeological Survey of India was requested to survey disputed area to prove the existence of a former Temple.⁵⁹⁰

The reports by ASI stated that there was a temple in twelfth century. Considering the report Allahabad High Court gave a judgement on 30th September 2010 dividing the whole disputed land between 3 parties. The part where

⁵⁸⁰ Bishwanath v. Thakur Radhavallabhji, 1967 AIR 1044.

⁵⁸¹ Farzana Shakoor, *Babri Mosque, and India's Secularism*, 46 PAKISTAN HORIZON 43, 43–54(1993).

⁵⁸² Iqbal A. Ansari, *Babri Masjid Dispute: Rule of Law and Building Confidence*, 36 EPW 4698, 4698–4701 (2001).

⁵⁸³ Ramesh Thakur, *Ayodhya and the Politics of India's Secularism: A Double-Standards Discourse*, 33 ASIAN SURV. 645, 645–664(1993).

⁵⁸⁴ Varma, Supriya & Jaya Menon, *Was There a Temple under the Babri Masjid? Reading the Archaeological Evidence*, 45 EPW 61, 61–72(2010).

⁵⁸⁵ Ayodhya Acquisition Act, 1993, No. 33, Acts of Parliament, 1993 (India).

⁵⁸⁶ INDIA CONST. art. 143.

⁵⁸⁷ Ayodhya Acquisition Act, 1993, §4, cl. 3, No. 33, Acts of Parliament, 1993 (India).

⁵⁸⁸ Dr M Ismail Faruqui v. Union of India, (1994) 6 SCC 360.

⁵⁸⁹ Ratna Kapur, *The Ayodhya Case: Hindu Majoritarianism and the Right to Religious Liberty*, 29 MD. J. INT'L L., 305 (2014).

⁵⁹⁰ A. G. Noorani, *The Babri Masjid-Ram Janmabhoomi Question*, 24 EPW 2461, 2461–2466 (1989).

the idol of Lord Ram was found was given to Ram Lalla Virajmaan, the storeroom, Sita Rasoi and Ram chabutra was given to Nirmohi Akhara and the remaining part was given to Sunni Waqf Board. On 9 May 2011, this decision of Allahabad High Court was overruled by Supreme Court. Unhappy by the decision of the court Sunni Waqf board filled another civil case to obtain the ownership of the inner courtyard popularly called the ***Shia central Waqf Board v. Sunni Central Board of Waqf***.⁵⁹¹

In 2018, after hearing numerous petition Supreme Court directed the hearing for the dispute to be heard in January 2019, a five-judge bench was constituted by chief justice Ranjan Gogoi for the hearing. Supreme Court gives a date of 8 March 2019 to settle the dispute with Court regulated mediation. The mediation panel included retired judge FMI Kalifulla, Sri Ravi Shankar, and senior advocate Sriram Panchu in May 2019 the mediation panel submits its final report with the supreme court after which a 40-day hearing takes place in Supreme court. Supreme Court reserved its judgement and asked the parties to submit a moulding of relief. Nirmohi Akhara wanted position of the inner courtyard, but they did not have any document as a proof for their possession. Sunni Waqf board pleading the demolition act as illegal asked for inner courtyard and reconstruction of the Masjid. They claimed that Ram Chabutra is the real birthplace of Hindu deity Ram and Hindu's can worship in that area. Ram Lalla Virajman Committee claimed that Ram temple have always existed in the disputed area, and they had the control of this area since 1949. They also laid down the weightage on the reports and finding submitted by ASI.⁵⁹²

Supreme Court held that based on the finding of the ASI Proprietor rights cannot be decided and said that Hindus were never stopped from worshipping in the area.

Supreme Court also held the decision of Allahabad High court as unsustainable. Supreme court also said that as most of the case is based on historical facts and figures relying on the probabilities Hindus are worshipping in the outer courtyard since 1857 which establishes their control on the outer courtyard and the Muslims control over the inner courtyard. Restricting Muslims form worshipping in that area is depriving them of their right to worship. So as per **Article 142 of the Indian Constitution**⁵⁹³ Supreme Court lay down its judgement providing the disputed land of 2.77 acre to Ram Lalla Virajman and Sunni Waqf Board to be provided with 5 acres land by the central government.

BABRI MAZID: A CONSTITUTIONAL APPROACH

Constitutional values form the cornerstone of this nation and have facilitated the lawful resolution of the present title dispute through forty-one days of hearings before this Court. Citizens of India have an indisputable right to enter any place of public resort and they cannot be refused or restricted from doing so based on their religion, race, caste, sex, or place of birth as provided in **Article 15(2)**⁵⁹⁴ of the constitution of India. The Government of Uttar Pradesh should have taken some action under **Section 145 of The Criminal Procedure Code**.⁵⁹⁵ As well in the case of **Sir Seth Hukumchand v. Maharaj Bahadur Singh**⁵⁹⁶ it was held that obstructing someone from worshipping or offering prayer is a punishable wrong.

Right to equality and right to freedom of religion are the most conflicting rights in the constitution of India. India being a secular country faces a lot of problems when it comes to distinguishing between violation of a person right as per **Article 15**⁵⁹⁷ and freedom of management of religious affairs as per **Article 26**⁵⁹⁸. Every citizen or non-citizen is allowed to

⁵⁹³ INDIA CONST. art. 142.

⁵⁹⁴ INDIA CONST. art. 15, cl. 2.

⁵⁹⁵ Code of Criminal Procedure, 1973, § 145, No. 2, Acts of Parliament, 1974 (India).

⁵⁹⁶ *Sir Seth Hukumchand v. Maharaj Bahadur Singh*, 1995 Supp (1) SCC 485.

⁵⁹⁷ INDIA CONST. art. 15.

⁵⁹⁸ INDIA CONST. art. 26.

⁵⁹¹ *Shia central Waqf Board v. Sunni Central Board of Waqf*, AIR 1954 All 88.

⁵⁹² Anupam. Gupta, *Dissecting the Ayodhya Judgment*, 45 EPW 30, 33–41(2010).

carry their religious rituals, obligations, and practices peacefully and harmoniously. There has always been apprehension between the two rights regarding their compatibility as right to freedom of religion is generally guided by ritual practises without any rational basis. During the right constituent assembly of 1947-50 it was decided to bring changes in the right to religion as the situation arises. This all has brought a secularization bid. Since then, there have been a lot of changes for example reforms in personal laws, *Triple talaq*⁵⁹⁹, Devdasi system, animal sacrifice, women priests, etc. The apprehensions of the Constituent Assembly appear to be revisited in the *Sabarimala issue*.⁶⁰⁰

In the course of exercising its authority, the Supreme Court may issue any decree or order necessary to provide full justice in any case or matter that is before it, and any such decree or order shall be enforceable throughout the territory of India in accordance with the provisions of any law passed by Parliament and, in the absence of such provisions, in accordance with the President's order. Supreme Court has a power under *Article 142 of the Constitution of India*⁶⁰¹ to take decisions to give every citizen of India a complete justice this article has been invoked by honourable.

Ayodhya case was one of the longest cases in the history of Supreme Court as it involved sentimental religious values to it. Providing complete justice was very important hence under *Article 142*⁶⁰² The expression *necessary for doing complete justice* has a broad scope, according to Supreme Court, and includes the use of equity when the precise application of the law is insufficient to create a just result. The demands of justice demand that we pay careful attention to both the positive law's statements and its silences to find a fair and just resolution within them. The foundation of the judicial

system is the application of broadly worded statutes to the particulars of a court case.

JUDICIARY AND SECULARISM

Though the author clearly supports the decision of the Supreme Court on the Ram Janmabhoomi case as it was a difficult judgement less connected with the facts and figures and more closely related to the religious sentiments of people but saying that the disputed property belonged to lord Rama because he was born there is nowhere mentioned in laws of our country. A child being born in a hospital does not automatically receive the proprietary rights of that place. Though in some cases a property can be owned by a deity. As the question was raised in *Mahant Damodar Das v. State of Rajasthan*⁶⁰³ the court held that deity could hold property in his name if it is given for the absolute worship.

In 1986 Faizabad district judge allowed Hindus to worship in the area where an ideal of Lord Ram was illegally kept but Muslims were kept from entering a holy place of worship. This judgement did no good and only aggravated communal riots. Though we cannot say that Supreme Court judgement was purely biased but, in some way, or the other power of the central government has affected the decision and the reports submitted by Archaeological Survey of India.⁶⁰⁴

Secularism is thus more than a passive attitude of religious tolerance. It is a positive concept of equal treatment of all religions. It does not matter whether secularism is adopted from Western culture or was present in India from the very beginning, but it is the very basic feature of our constitution as stated in the cases of *Keshavananda Bharati*⁶⁰⁵ and *Indira N. Gandhi versus Raj Narayan*⁶⁰⁶

⁵⁹⁹ Shayara Bano v. Union of India, AIR 2017 9 SCC 1 (SC).

⁶⁰⁰ Indian Young lawyers Association & Ors. v. The State of Kerala & Ors. (2017) 10 SCC 689.

⁶⁰¹ INDIA CONST. art. 142.

⁶⁰² *supra* note 14.

⁶⁰³ Mahant Damodar Das v. State of Rajasthan, (2014) 5 SCC 530.

⁶⁰⁴ Gopal, Sarvepalli, *The Political Abuse of History: Babri Masjid-Rama Janmabhumi Dispute*, 18 SOCIAL SCIENTIST 70, 76-81(1990).

⁶⁰⁵ Kesavananda Bharati v. State of Kerala, (1973) 4 SCC 225.

⁶⁰⁶ Indira N. Gandhi v. Raj Narain (1975) Supp SCC 1.

The Places of Worship Act, 1991⁶⁰⁷ was enacted by the Parliament which prohibited the conversion of any place of worship having a retrospective approach from 15th August 1947 that is after India got independence from the Colonial rule in this act **Section 2(c)**⁶⁰⁸ defines place of worship as a temple, mosque, gurudwara, church monastery or any other place of public religion **Section 3**⁶⁰⁹ prohibited conversion of place of worship of one religion into another religious denomination but **Section 5**⁶¹⁰ states that this act cannot be applied on Ram Janmabhoomi Babri Masjid case but surely this act imposes on us a duty of maintaining the true meaning of word secularism in India. As stated in the case of **S.R. Bommai v. Union of India**⁶¹¹

Determining who possesses a legal personality is a challenging process as mentioned in the case of **Shiromani Gurdwara Prabandhak Committee Amritsar v. Somnath Das**⁶¹² where the court determined the legal personality of Guru Granth Sahib. In the case of **Bala Shankar Maha Shanker Bhattjee v. Charity Commissioner**⁶¹³ it was laid down that if public is offering prayers in a temple or any other place of worship of any religious denomination then it becomes a public temple and its existence become strong.

GOVERNMENT AND SECULARISM

LK Advani proceeded with his Rath Yatra before the elections this move can be clearly seen as a way of grasping more votes as the population of India has many Hindus in it. In the elections of 1989 and 1991, BJP got 86 and 119 seats respectively in the Loksabha the reason can be seen as directly related to the party's

identification with Hindu culture and religion and the election manifesto was clearly the demolition of Babri mosque, promulgation of a uniform civil code, appeasement of majority (Hindus) and striking down of **Article 370**.⁶¹⁴ To increase its following BJP used Babri Masjid as a clear opportunity and appealed to the majority in India. Here religion was used as a political technique of grasping more and more votes and winning the elections by suffocating the very basic principle of India that is secularism. Its least expected of the central government of India to not discriminate on secular basis because India itself is a country of diverse cultures and religions and that is something to be proud of.

Where the Congress government can be taken as a culprit in the controversy over Babri Masjid as it was during Rajiv Gandhi government in 16th century, when the gates of the mosque were opened and VHP was given permission to lay the foundation of a temple a few miles away from the disputed area. In the election campaign for 1989 Rajiv Gandhi first said that there will be no *Hindu Rashtra* and the latter appealing the masses he asked Hindus to vote Congress if they wanted a Ram Rajya which was quiet against his party's ideology at that time. Congress tried to play the communal card time and time again as in the elections of 1991 when they promise to protect Babri Masjid to regain trust over Muslims.

RULE OF LAW

The demolition of Babri Masjid clearly showed us the brittle state of rule of law in our country. It is regrettable that the district administration views its job as giving the political executive the greatest amount of satisfaction possible, even during circumstances of intergroup conflict, causing it to occasionally behave in a partisan way disregarding the law, as was the case in Ayodhya.

⁶⁰⁷ The Places of Worship Act, 1991, No. 42, Acts of Parliament, 1991 (India).

⁶⁰⁸ The Places of Worship Act, 1991, §2, cl. c, No. 42, Acts of Parliament, 1991 (India).

⁶⁰⁹ The Places of Worship Act, 1991, §3, No. 42, Acts of Parliament, 1991 (India).

⁶¹⁰ The Places of Worship Act, 1991, §5, No. 42, Acts of Parliament, 1991 (India).

⁶¹¹ S.R. Bommai v. Union of India, (1994)0 3 SCC 1.

⁶¹² Shiromani Gurdwara Prabandhak Committee Amritsar v. Somnath Das, (2000) 4 SCC 146.

⁶¹³ Bala Shankar Maha Shanker Bhattjee v. Charity Commissioner, (1933) 38 LW 306 PC.

⁶¹⁴ INDIA CONST. art. 370.

The demolition of Babri Masjid was a clear violation of **Article 26⁶¹⁵** and **25⁶¹⁶** in respect of the Muslims who is right to worship was violated. Every democratic country has a duty to provide to its citizen freedom of expression and non-discrimination based on religion. The word secularism was added into the constitution of India in 1950 and was included in the preamble during the 42nd amendment which came into effect in 1977. As expressed by Swami Vivekananda *religion is not in dogmas nor in intellectual argumentation it is being and becoming, it is realisation.*

LIMITATIONS ACT: TAKE ON BABRI MASJID CASE

When the case of Babri Masjid is discussed under **Sec 142 of the Limitation Act, 1898⁶¹⁷** which states that when a person stops the use of a property a discontinued possession for a period of more than 12 years, he remains no longer the owner of the land in the eyes of law. The word **disposition** is defined under **the Black laws dictionary** as follows “deprivation of objection from rightful possession of property the wrongful taking or withholding of possession of land from the person lawfully and title to it ouster⁶¹⁸ And also under **P Ramanatha Aiyar’s Advanced Law Lexicon** as “Dispossession or ouster is wrongfully taking possession of land from its rightful owner. The dispossession applies only to cases where the owner of land has, by the act of some person, been deprived altogether of his dominion over the land itself, or the receipt of its profits. A person cannot be dispossessed of immoveable property unless he was possessed thereof at the time.”⁶¹⁹

Later in the case of **Supdt & Remembrancer of legal Affairs West Bengal v. Anil Kumar Bhunia⁶²⁰** and **Shyam Sunder Prasad v. Raj Pal**

Singh⁶²¹ it was held that the meaning of possession cannot be defined in general as it differs from case to case and based on the facts and circumstances of the case.

INTERNATIONAL REACTION ON THE CASE

PAKISTAN

The decision on the Babri Masjid case was awaited not only by Indians but also people around the world specially the Muslims living outside India. As a protest the demolition of Babri Masjid, the Government of Pakistan closed offices and schools. The Indian Ambassador was summoned by the Pakistani foreign ministry to file a formal complaint against those who violated the worshipping rights of Muslims. The ministry also threatened Indian government to involve United Nations and the organisation of the Islamic conference if immediate steps were not taken for the protection of Muslim rights. Around thirty temples were destroyed in Pakistan by the Muslim and the office of Air India in Lahore was also attacked by the angry Muslim mobs. Fire of Revenge was seen all over the country. Many of the Hindus were killed and their houses were burnt and destroyed.

BANGLADESH

After the demolition of Babri Masjid, Bangladesh witnessed the many communal riots. A mob of Muslims burnt down many Hindu temples in Bangladesh along with their shops and houses killing hundreds of Hindus. During an India Bangladesh cricket match which was held in the Bangabandhu National Stadium the mob of Angry Muslims of around 5000 men entered in the stadium and disrupted the match. The office of Air India in Dhaka was also destroyed, fear of destruction spread which led to reduction in the Durga Puja celebrations of 1993 by the Bangladeshi Hindu community.

MIDDLE EAST

Middle East also tasted the flavour of destruction as Gulf Cooperation Council

⁶¹⁵ *supra* note 11.

⁶¹⁶ INDIA CONST. art. 25.

⁶¹⁷ Limitation Act, 1963, No. 36, Acts of Parliament, 1963 (India).

⁶¹⁸ BLACK LAW DICTIONARY, 10th (572).

⁶¹⁹ P RAMANANTHA AIYAR ‘S ADVANCED LAW LEXICON, 5th (1537 & 1563).

⁶²⁰ Supdt and Remembrancer of legal Affairs West Bengal v. Anil Kumar Bhunia, (1979) 4 SCC 274.

⁶²¹ Shyam Sunder Prasad v. Raj Pal Singh, (1995) 1 SCC 311.

showed their opposition on the Babri Masjid demolition during the Summit meeting in Abu Dhabi and declared the demolition of Babri Masjid as a crime against Muslim holy places. This was condemned by Indian government as an interference in its internal affairs. UAE home to many Indian and Pakistani communities had very moderate reaction in Dubai Streets where protests broke out and people threw stones on Hindu temples criticizing the demolition of Babri Masjid. Dhahi Khalfan commander in chief of Dubai police force also condemned the violence and destruction created by different communities in Dubai.

CONCLUSION

Our country must find the way through the maze of communalism as it threatens the very basic fundamentals of our country that is democracy and secularism. The final decision on the decades old case was given on October 16, 2019, by the Supreme Court. It can be seen as a very suitable option and judgement given by the 5-judge Constitution Bench which was led by Chief Justice Ranjan Gogoi as any judgement which involves around religion and includes sentiments and emotions of people is not easy. The fact that still no action is taken against the kar sevaks or ministers which benefited from the demolition of Babri Masjid is both unconstitutional and degrading on the secularism of India.

Whenever there is communal conflict in a country the strength and the quality of the Constitution is always at test along with the country's political process. The political leaders of the country have the duty to solve these issues before the constitution of the legal system are put under strain. Involving the judiciary aggravates the matters specially if it is about communities and their religion as it includes sentimental values. The political parties which use religion as a weapon and play with the sentiments of people should be made liable and punished for such an act. Although the Babri Masjid dispute existed even before Vishva Hindu Parishad came into being, but

they are responsible for making the dispute a national dispute and putting the secularism of India at stake.

SUGGESTIONS

- People must understand the constitution of India provides us some rights as well as some duties and both are to be exercised by us for the betterment and well-being of our nation. It is their duty to be well informed about the motives and not to follow people who are here for them on interest. To select a government which do not divide our country on communal basis.
- As in this case the decision was not only about the proprietor rights of a property, but it also questions the secularism, unity, and integrity of our nation. Some strict action should be taken against the people who to prove to be a threat to any of the three principles stated above. Codification of laws dealing with the property rights of the Deity should be done so that similar communal riots can be avoided. This will save the time and money of the court.
- There are many unresolved cases relating to rape, domestic violence, honour killing, dowry death etc. which are not getting justice because of lack of courts and justice. These cases should be treated at a priority basis. Communal violence degrades the growth and development of the society and the nation so it should be discouraged at national and state levels.
- Political parties in India should understand that India is a group of different religion and any of the party forming the government whether at central or state level has a duty to keep it together. The researcher believes we have a country must learn how to live together as living together include compromise on both the parts.

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