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ONE NATION, ONE ELECTION: CONSTITUTIONAL FEASIBILITY, FEDERAL CHALLENGES, AND THE PATH TO ELECTORAL SYNCHRONISATION IN INDIA

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ABSTRACT

India's electoral framework has long been characterised by a perpetually fragmented electoral calendar that imposes substantial fiscal, administrative, and governance costs upon the nation's federal democratic structure. The proposal for One Nation One Election (ONOE) – the simultaneous conduct of elections to the Lok Sabha and all State Legislative Assemblies – represents the most ambitious electoral reform proposed since the synchronised elections of 1952–1967. The Constitution (One Hundred and Twenty-Ninth Amendment) Bill, 2024, introduced on the recommendations of the High-Level Committee chaired by former President Ram Nath Kovind, has renewed legislative urgency around the question of whether simultaneous elections are constitutionally permissible and institutionally viable within India's parliamentary federal democracy. This paper undertakes a doctrinal legal analysis of ONOE's constitutional foundations, examines the rationale for and against electoral synchronisation, draws upon comparative international experiences from South Africa, Sweden, Belgium, Indonesia, Germany, and the Philippines, and critically evaluates the constitutional, federal, administrative, and democratic challenges to implementation. The paper concludes that while ONOE carries genuine administrative and fiscal merit, its implementation requires a carefully calibrated framework of constitutional amendments, state ratification, institutional reform, and political consensus – and that a phased, federally sensitive transition model represents the only constitutionally defensible path forward.

Keywords: *One Nation One Election; simultaneous elections; basic structure doctrine; federalism; Election Commission of India; constitutional amendment; Article 368; Model Code of Conduct.*

I. INTRODUCTION

India's constitutional democracy is anchored in the regular and free conduct of elections, a function entrusted to the Election Commission of India (ECI) under Article 324 of the Constitution.¹⁰¹⁴ The first general elections of 1951–52 established a precedent of electoral synchronisation, with polling for the Lok Sabha

and all State Legislative Assemblies conducted simultaneously – a pattern maintained through the elections of 1957, 1962, and 1967.¹⁰¹⁵ This synchronised model provided the central and state governments with a predictable five-year governance cycle free from the constant disruption of staggered electoral competitions.

¹⁰¹⁴Constitution of India, 1950, art. 324 (conferring upon the Election Commission of India superintendence, direction, and control over elections to Parliament and State Legislatures).

¹⁰¹⁵The first general elections of 1951–52 saw simultaneous polling for the Lok Sabha and all State Legislative Assemblies. See Election Commission of India, First Annual Report 1983 (ECI, 1983).

The fracture of this synchronised calendar began in 1968 and 1969, when premature dissolutions of state assemblies disrupted the shared electoral timeline, and was compounded by the dissolution of the Fourth Lok Sabha in 1970 and the Emergency imposed under Article 352 between 1975 and 1977. From 1971 onwards, elections to the Lok Sabha and various State Assemblies began occurring at different intervals, inaugurating what has been described as an era of 'perpetual electioneering' in India. The administrative and governance costs of this fragmentation have been extensively documented: the Law Commission of India's 170th and 255th Reports identified electoral fragmentation as an impediment to stable governance,¹⁰¹⁶ the NITI Aayog's 2017 discussion paper described the Model Code of Conduct (MCC) as a recurring cause of policy paralysis,¹⁰¹⁸ and the 79th Parliamentary Standing Committee Report of 2015 advocated phased synchronisation through statutory and constitutional amendments.¹⁰¹⁹

In 2024, Parliament introduced the Constitution (One Hundred and Twenty-Ninth Amendment) Bill on the basis of the High-Level Committee (HLC) Report chaired by former President Ram Nath Kovind, which proposed a three-phase roadmap toward synchronisation by 2029 through amendments to Articles 83, 85, 172, 174, and 324, and the insertion of new Articles 82A and 324A.¹⁰²⁰ The Bill has revived fundamental questions about whether ONOE is constitutionally permissible within the framework of India's parliamentary federalism, consistent with the basic structure doctrine as articulated in *Kesavananda Bharati v. State of*

Kerala,¹⁰²² and compatible with the federal principles affirmed in *S.R. Bommai v. Union of India*.¹⁰²³

This paper proceeds as follows. Part II examines the rationale for simultaneous elections, addressing fiscal, governance, and democratic arguments. Part III analyses international comparative experiences. Part IV critically evaluates the constitutional, federal, and administrative challenges to ONOE. Part V examines the constitutional and legal framework required for implementation. Part VI sets out recommendations and concludes.

II. RATIONALE FOR SIMULTANEOUS ELECTIONS

A. Fiscal and Administrative Efficiency

The most frequently cited argument in favour of ONOE is the substantial fiscal savings it promises. India's staggered electoral calendar imposes recurring costs across multiple annual election cycles. The 2019 General Elections alone cost approximately ₹5,500 crore, with cumulative expenditures across all state and national electoral cycles exceeding ₹10,000 crore per cycle.¹⁰²⁴ NITI Aayog projections estimate that synchronisation of elections at all levels could save approximately ₹45,000 crore over a five-year period.¹⁰²⁵ Beyond direct financial costs, each election cycle requires the mobilisation of millions of polling personnel, central armed police forces, and administrative machinery – placing acute pressure on state governments and the civil services.

A closely related concern is the recurrent imposition of the Model Code of Conduct. When applied to five or six states holding elections on

¹⁰¹⁶Law Commission of India, 170th Report on Reform of Electoral Laws (May 1999) [hereinafter Law Commission 170th Report].

¹⁰¹⁷Law Commission of India, 255th Report on Electoral Reforms (March 2015) [hereinafter Law Commission 255th Report].

¹⁰¹⁸NITI Aayog, Discussion Paper on Simultaneous Elections: What, Why and How (January 2017) [hereinafter NITI Aayog Discussion Paper].

¹⁰¹⁹Department-Related Parliamentary Standing Committee on Law and Justice, 79th Report on Electoral Reforms (December 2015) [hereinafter 79th Parliamentary Standing Committee Report].

¹⁰²⁰High-Level Committee on One Nation One Election, Final Report (2024), Ministry of Law and Justice [hereinafter HLC Report 2024].

¹⁰²¹Constitution (One Hundred and Twenty-Ninth Amendment) Bill, 2024 (proposing insertion of Articles 82A and 324A, and amendments to Articles 83, 85, 172, 174 and 324 of the Constitution of India).

¹⁰²²*Kesavananda Bharati v. State of Kerala*, AIR 1973 SC 1461 (establishing the doctrine that Parliament cannot amend the 'basic structure' of the Constitution under Article 368).

¹⁰²³*S.R. Bommai v. Union of India*, (1994) 3 SCC 1 (affirming federalism as a non-negotiable component of the basic structure of the Constitution of India).

¹⁰²⁴Election Commission of India, Report on General Elections 2019 (2020) (reporting an expenditure of ₹5,500 crore for the 2019 general elections alone).

¹⁰²⁵NITI Aayog Discussion Paper, supra note 5, at 12 (projecting cumulative savings of approximately ₹45,000 crore over a five-year cycle if elections are synchronised at all levels of government).

a rolling annual basis, the MCC effectively freezes developmental policy announcements, public procurement, and welfare implementation for extended periods each year. The NITI Aayog's 2017 discussion paper estimated that the cumulative governance disruption caused by rolling MCC impositions constitutes a significant drag on economic policy continuity. Synchronising elections into a single cycle would limit MCC operation to one concentrated period every five years, releasing the governance machinery for uninterrupted policy implementation across intervening years.

B. Macroeconomic and Governance Benefits

Empirical research has provided quantitative support for the economic arguments in favour of ONOE. Singh and Mishra's macroeconomic study, using historical data from periods of electoral synchronisation and staggering in India, found that synchronous election years corresponded with significantly higher GDP growth at both national and state levels, lower inflation, increased private investment, and a higher proportion of government spending directed toward capital projects.¹⁰²⁶ The authors suggest that reduced political uncertainty and fewer policy disruptions may explain these macroeconomic gains, and caution that administrative cost savings – while real – may be less significant than the broader political economy effects of stability on investor confidence.

Research by Balasubramaniam, Bhatiya, and Das, drawing on large-scale election data, found that simultaneous elections increase the probability of the same party winning at both national and state levels by approximately 21%, while not producing significant negative short-term governance effects in terms of development expenditure.¹⁰²⁷ The era of

simultaneous elections between 1952 and 1967 witnessed consistently higher voter participation, with turnout rates above 60%, suggesting that synchronisation may also enhance democratic participation by concentrating civic attention on a single, unified electoral moment.

C. Voter Participation and Democratic Engagement

Proponents of ONOE argue that the consolidation of elections into a single cycle reduces voter fatigue, improves the quality of democratic participation, and focuses public attention more effectively on governance outcomes. Data from the Centre for the Study of Developing Societies – Lokniti (CSDS-Lokniti) indicates that voter engagement tends to diminish in states experiencing back-to-back elections, with subsequent phases in multi-phase polls recording lower turnout. A consolidated electoral moment, supported by unified civic education campaigns, may reverse this trend by simplifying the electoral landscape for voters and reducing the psychological burden of repeated mobilisation.¹⁰²⁸

III. INTERNATIONAL COMPARATIVE EXPERIENCES

A. South Africa: Constitutional Synchronisation in a Unitary Democracy

South Africa's Constitution of 1996 provides the most instructive example of constitutional synchronisation for India. Sections 46 and 105 of the South African Constitution explicitly prescribe that elections to the National Assembly and provincial legislatures must be held simultaneously every five years, with the Independent Electoral Commission (IEC) – a constitutionally mandated body under Section 190 – managing elections at all levels through a single electoral roll.¹⁰²⁹ The 2019 general elections,

¹⁰²⁶N.K. Singh & Prachi Mishra, *Macroeconomic Impact of Harmonizing Electoral Cycles: Evidence from India* (SSRN Working Paper, June 13, 2024) (finding that synchronised election years correspond with significantly higher GDP growth, lower inflation, increased investment, and higher capital expenditure).

¹⁰²⁷Vimal Balasubramaniam, Apurav Y. Bhatiya & Sabyasachi Das, *Voting in Synchronized Elections: Evidence from India* (SSRN Working Paper, Jan. 9,

2025) (finding a 21% increase in the probability of the same party winning at both national and state levels when elections are held simultaneously).

¹⁰²⁸Bhaswat Prakash, *One Nation One Election: A Comparative Analysis from Voter Behavior to Political Polarization* (SSRN Working Paper, Nov. 2024), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5007991.

¹⁰²⁹Constitution of the Republic of South Africa, 1996, ss 46 and 105 (prescribing that elections to the National Assembly and provincial legislatures must be held every five years simultaneously).

in which over 220,000 officials managed approximately 23,000 voting stations and 65.99% of registered voters participated on a single day,¹⁰³⁰ demonstrate that simultaneous elections are operationally feasible even at significant scale. South Africa's experience highlights two critical lessons for India: first, that explicit constitutional mandates for synchronisation are essential to prevent arbitrary dissolution from disrupting the electoral calendar; and second, that institutional independence of the electoral management body is indispensable for maintaining operational credibility.

B. Sweden and Belgium: Contrasting Federal Lessons

Sweden's experience demonstrates that synchronisation, when embedded in a stable unitary constitutional framework, produces exceptional administrative and participatory outcomes. Since the 1970s, Sweden has conducted simultaneous elections for the Riksdag, 21 County Councils, and 290 Municipal Assemblies every four years on the second Sunday of September, using colour-coded ballots to maintain voter clarity.¹⁰³¹ Voter turnout in Sweden consistently exceeds 85%, and per-voter election expenditure of €2.5 ranks among the lowest in the European Union.¹⁰³² Sweden's unitary structure, however, means that the constitutional conflicts between federal and state electoral prerogatives that beset India simply do not arise.

Belgium, by contrast, presents a cautionary parallel for India as a complex multilingual federal state. While Belgium endeavours to synchronise federal, regional, and

European elections every five years, political instability has repeatedly disrupted this schedule. The 2010 elections, following early dissolution of the federal parliament, required 541 days to form a government.¹⁰³³ Belgium's chronic political fragmentation demonstrates that simultaneous elections are administratively possible in a complex federal democracy but are vulnerable to coalition collapse and parliamentary instability – risks that are highly relevant to India's multiparty coalition politics.

C. Indonesia: The Dangers of Administrative Overreach

Indonesia's 2019 simultaneous elections – combining presidential, legislative, and regional elections on a single day, 17 April 2019, with 192 million registered voters and five separate ballots – represented the most ambitious electoral synchronisation experiment in the democratic world. The Komisi Pemilihan Umum (KPU) deployed 7.2 million temporary polling workers and established over 800,000 polling stations.¹⁰³⁴ The exercise achieved significant logistical efficiencies but exposed critical administrative vulnerabilities: more than 550 polling officials died, reportedly due to fatigue and inadequate medical support, and widespread confusion at polling booths was reported.¹⁰³⁵ Indonesia's experience constitutes a direct warning for India: electoral synchronisation must be paired with comprehensive infrastructure investment, phased rollout, and robust human welfare safeguards for polling personnel – it cannot be treated as a purely scheduling exercise.

¹⁰³⁰Independent Electoral Commission of South Africa, General Elections Report 2019 (IEC, 2020), <https://www.elections.org.za> (reporting 65.99% voter turnout and deployment of over 220,000 officials across approximately 23,000 voting stations on 8 May 2019).

¹⁰³¹Swedish Election Act (2005:837); Swedish Instrument of Government (1974:152), ch 3 (providing for simultaneous polling for the Riksdag, 21 County Councils, and 290 Municipal Assemblies every four years on the second Sunday of September).

¹⁰³²OECD, Government at a Glance: Sweden (2020), <https://www.oecd.org/sweden> (documenting a per-voter election expenditure of €2.5 for Swedish general elections, among the lowest in the European Union).

¹⁰³³OSCE, Belgium: Election Assessment Report, 2019 (2020), <https://www.osce.org> (analysing the May 2019 simultaneous federal, regional, and European Parliament elections in Belgium and noting that coalition fragmentation led to 541 days of government formation negotiations following the 2010 federal elections).

¹⁰³⁴Komisi Pemilihan Umum (KPU), General Elections 2019: Final Report (2020) (documenting the deployment of 7.2 million temporary polling workers and the establishment of 800,000 polling stations for the April 2019 simultaneous elections in Indonesia).

¹⁰³⁵International IDEA, Indonesia's 2019 Elections: Success or Sacrifice? (2019) (reporting that more than 550 polling officials died, reportedly due to fatigue and inadequate medical support, following the April 2019 simultaneous elections in Indonesia).

D. Comparative Analysis: Typologies and Lessons

The International IDEA's 2023 Comparative Study on Electoral Synchronisation identifies three typologies of simultaneous election models: full synchronisation (Sweden, South Africa), partial synchronisation with federal flexibility (Germany, Belgium), and complex synchronisation with partial alignment across levels (Indonesia, Philippines).¹⁰³⁶ Successful synchronisation models share three features: explicit constitutional or statutory mandates providing legal certainty; independent and well-resourced electoral management bodies with operational autonomy; and sustained public trust in the electoral process. India must evaluate these typologies against its own constitutional architecture, federal asymmetry, and sociopolitical diversity to identify a model appropriate to its unique democratic framework.

IV. CONSTITUTIONAL AND FEDERAL CHALLENGES

A. The Basic Structure Doctrine

The most fundamental constitutional challenge to ONOE arises from the basic structure doctrine enunciated in *Kesavananda Bharati v. State of Kerala*. The Supreme Court held that while Parliament possesses wide amendment powers under Article 368, it cannot destroy the 'basic structure' of the Constitution, which includes democracy, federalism, the separation of powers, and free and fair elections. In *Indira Nehru Gandhi v. Raj Narain*,¹⁰³⁷ the Court specifically affirmed that elections are not a privilege granted by the state but a mechanism of public sovereignty, and that manipulating electoral timelines distorts the democratic framework. ONOE's requirement that multiple

¹⁰³⁶International IDEA, Comparative Study on Electoral Synchronisation (2023), <https://idea.int> (identifying three typologies of synchronised elections: full synchronisation, partial synchronisation with flexibility, and complex synchronisation).

¹⁰³⁷*Indira Nehru Gandhi v. Raj Narain*, AIR 1975 SC 2299 (holding that free and fair elections constitute an element of the basic structure of the Constitution).

¹⁰³⁸*People's Union for Civil Liberties v. Union of India*, (2013) 10 SCC 1 (reiterating that free and fair elections form part of the basic structure of the Constitution and represent a mechanism for the exercise of public sovereignty).

state assemblies have their terms artificially extended or curtailed to align with the Lok Sabha schedule raises serious questions about whether such manipulation constitutes an impermissible interference with periodic electoral accountability – an element that the Court in *People's Union for Civil Liberties v. Union of India*¹⁰³⁸ confirmed forms part of the basic structure.

B. Federalism and State Autonomy

India's constitutional federalism, declared a basic structure element in *S.R. Bommai v. Union of India*, presents the second principal challenge to ONOE. Article 172(1) mandates that each State Legislative Assembly continue for five years from the date of its first sitting unless dissolved sooner,¹⁰³⁹ a provision that reflects the constitutional independence of state democratic mandates. Any constitutional amendment extending or curtailing state assembly terms purely to align them with the national electoral calendar – without compelling constitutional justification – risks undermining the principle of state legislative sovereignty. Furthermore, Articles 243K and 243ZA constitutionally mandate State Election Commissions to oversee local body elections independently of the ECI,¹⁰⁴⁰ a structure that ONOE's administrative consolidation could inadvertently compromise. Several states, including Tamil Nadu, Kerala, and Andhra Pradesh, have formally objected to ONOE on federal grounds before both the Law Commission and the High-Level Committee.

C. Parliamentary Instability and the Problem of Hung Legislatures

India's parliamentary democracy is inherently susceptible to governmental

¹⁰³⁹Constitution of India, 1950, art. 172(1) (providing that every State Legislative Assembly shall continue for five years from the date of its first sitting unless dissolved sooner).

¹⁰⁴⁰Constitution of India, 1950, arts. 243K and 243ZA (constitutionally mandating State Election Commissions to oversee elections to municipalities and panchayats, thereby creating a distinct tier of electoral management independent of the Election Commission of India).

instability through coalition breakdown, floor-crossing, and no-confidence motions. The Constitution empowers the President under Article 85(2)(b) and Governors under Article 174(2)(b) to dissolve the Lok Sabha or State Assemblies when stable majorities cannot be maintained.¹⁰⁴¹ ONOE's premise of uniform five-year electoral cycles is fundamentally incompatible with this constitutional reality. Historical precedents – including the hung Lok Sabha of 1996, the prolonged President's Rule in Jammu & Kashmir in 2002, and the Delhi government's collapse after 49 days in 2013 – demonstrate that political ruptures cannot be eliminated by scheduling. Any constitutional framework for ONOE must include detailed provisions for managing mid-term disruptions, particularly through the 'unexpired term doctrine' recommended by the Law Commission, under which fresh elections following a premature dissolution would be held only for the remainder of the original term rather than triggering a new full five-year cycle.¹⁰⁴²

D. Operational and Logistical Challenges

The operational challenge of conducting simultaneous elections across 543 Lok Sabha constituencies, 4,120-plus State Assembly constituencies, and thousands of local body wards is enormous. The 2019 General Elections alone required six to seven phased polling rounds due to resource constraints. Simultaneous elections would necessitate the concurrent deployment of approximately 10 lakh EVMs and VVPATs,¹⁰⁴³ over one crore polling officials, and substantial central armed police forces – all within a compressed electoral window. The Indonesian experience of 2019,

where administrative overstretch resulted in over 550 deaths among polling officials, underscores the human cost of synchronisation without adequate preparation. India's geographic diversity, connectivity challenges in northeastern and tribal regions, and varying literacy rates further compound these logistical complexities.

E. Political Resistance and Democratic Legitimacy

A structural challenge to ONOE's implementation is the political resistance of regional parties and opposition-led states. The HLC Report 2024 noted that while 32 out of 47 political parties supported ONOE in principle,¹⁰⁴⁴ major regional parties including the DMK, TMC, BJD, and AAP opposed the proposal on the grounds that simultaneous elections would advantage national parties and marginalise regional political narratives. Dubey and Sahi's mathematical modelling confirms that electoral simultaneity structurally increases the probability of single-party sweeps in polarised electorates, irrespective of coattail effects.¹⁰⁴⁵ Wani and Dar further argue that staggered elections allow state-level polls to serve as 'federal checks' on national electoral waves, preserving the representational pluralism essential to India's 'unity-in-diversity'.¹⁰⁴⁶ Any reform that is perceived as politically motivated rather than constitutionally principled risks undermining the democratic legitimacy that must underpin so fundamental a restructuring of India's electoral calendar.

V. CONSTITUTIONAL AND LEGAL FRAMEWORK FOR IMPLEMENTATION

A. Constitutional Amendments Required

¹⁰⁴¹Constitution of India, 1950, arts. 85(2)(b) and 174(2)(b) (empowering the President and Governors respectively to dissolve the Lok Sabha and State Legislative Assemblies upon advice or where no stable majority exists).

¹⁰⁴²Law Commission of India, Draft Report on Simultaneous Elections (30 August 2018) [hereinafter Law Commission Draft Report 2018] (recommending a one-time synchronisation of electoral cycles through extension or curtailment of existing assembly terms, constructive no-confidence votes, and fixed-term legislatures subject to specified exceptions).

¹⁰⁴³Seema Devi et al., One Nation, One Election in Federal Democracies: A Comparative Study of Global Experiences, 30(5) Educational Admin.: Theory & Prac. 10298 (2024) (finding that the 2019 Indian general elections cost approximately USD 7 billion, making India one of the most expensive electoral democracies).

¹⁰⁴⁴Press Information Bureau (Govt of India), One Nation, One Election – Press Release (Dec. 17, 2024) (reporting that 32 out of 47 political parties that submitted feedback supported the concept, with 80% of over 21,500 public responses expressing support).

¹⁰⁴⁵Pradeep Dubey & Siddhartha Sahi, Simultaneous Elections in Polarized Society Make Single-Party Sweeps More Likely (Mar. 2025) (arXiv preprint) (demonstrating mathematically that simultaneity of elections increases the probability of single-party electoral sweeps independent of coattail effects).

¹⁰⁴⁶Aejaz Ahmad Wani & Rouf Ahmad Dar, Simultaneous Elections in Plural Societies: Overlapping Social Cleavages and Democratic Stability in India, 59(1) Econ. & Pol. Weekly (Jan. 6, 2024).

The constitutional and legal framework for ONOE requires amendments at multiple levels. At a minimum, Articles 83 and 172 must be amended to permit the limited extension or curtailment of legislative terms for synchronisation purposes, with explicit constitutional backing to insulate such provisions from challenge under the basic structure doctrine.¹⁰⁴⁷ The High-Level Committee proposed the insertion of Article 82A to empower Parliament to fix a common electoral cycle for the Lok Sabha and all State Assemblies, and Article 324A to extend this framework to local body elections. The proposed 129th Amendment Bill, if enacted, would provide the constitutional foundation for these changes. Critically, since these amendments affect the federal structure of India, they would require ratification by not less than half of the State Legislatures under Article 368(2)¹⁰⁴⁸ – a procedural threshold that reflects, and constitutionally enforces, the cooperative federalism that must underpin any legitimate implementation of ONOE.

B. Statutory Framework

Constitutional amendments must be accompanied by comprehensive statutory reform. The Representation of the People Act, 1951 must be amended to align electoral notification procedures, disqualification timelines, and dispute resolution mechanisms for simultaneous elections – provisions that the Act, in its current form, does not envisage.¹⁰⁴⁹ The Law Commission's Draft Report of 2018 recommended a dedicated statutory framework – effectively a 'Simultaneous Elections Act' – to consolidate provisions from the Constitution, the RPA, the Election Symbols Order, and the Model Code of Conduct into a coherent operational instrument. This statute should define electoral timelines, provide protocols for mid-term

disruptions including premature dissolution and hung legislatures, establish the 'unexpired term doctrine' as the applicable legal standard for fresh elections following dissolution, and specify coordinated election notification procedures for the ECI and State Election Commissions.

C. Institutional Reforms

Effective implementation of ONOE requires substantial institutional strengthening. The ECI, currently empowered under Article 324 for procedural superintendence of elections, must be vested with enhanced statutory authority to frame and enforce integrated electoral schedules in consultation with the President, Governors, and State Election Commissions.¹⁰⁵⁰ A permanent Electoral Reforms Commission, constituted by statute and comprising retired Supreme Court judges, senior electoral officials, constitutional experts, and state representatives, should be established to coordinate inter-agency implementation, monitor phased rollout, and resolve administrative disputes. A unified digital electoral roll, integrating ECI and SEC databases through Aadhaar-linked voter identification, is essential for operational efficiency and must be accompanied by robust data security and privacy protections. The Model Code of Conduct must also be revised to provide tiered enforcement windows differentiating between national, state, and local electoral concerns – preventing the prolonged governance stasis that the current MCC model imposes.

VI. RECOMMENDATIONS AND CONCLUSION

A. A Phased Implementation Model

The research findings of this paper support a phased, federally sensitive implementation model as the only constitutionally defensible path toward ONOE. In

¹⁰⁴⁷Constitution of India, 1950, arts. 83(2) and 172 (requiring that the Lok Sabha and State Legislative Assemblies continue for five years from the date of the first sitting, subject to earlier dissolution, without permitting artificial extension or curtailment for administrative convenience).

¹⁰⁴⁸Constitution of India, 1950, art. 368(2) (requiring that constitutional amendments affecting the federal structure of India must be ratified by not less than half of the State Legislatures in addition to the special majority in Parliament).

¹⁰⁴⁹Representation of the People Act, 1951, §§ 14–15 (India) (prescribing independent timelines for notification of elections to the House of the People and State Legislative Assemblies).

¹⁰⁵⁰HLC Report 2024, supra note 7 (recommending introduction of an 'Appointed Date' mechanism as a synchronisation anchor, amendments to Articles 82A, 83, 172, and 324A, and a phased roadmap toward electoral synchronisation by 2029).

Stage One, elections for the Lok Sabha should be synchronised with those State Assemblies whose terms naturally coincide with or fall within a six-month window of the national election – including Andhra Pradesh, Odisha, and Sikkim, which have historically aligned terms. This stage requires minimal constitutional amendment and serves as an empirical pilot for assessing logistical, administrative, and political outcomes.

In Stage Two, remaining State Assemblies should be brought into synchronisation through a combination of voluntary dissolution incentivised by administrative and financial benefits, and constitutional amendment enabling the 'unexpired term doctrine' for successor Houses. Stage Three, envisaging synchronisation of local body elections within a 100-day window following the general election, should be pursued only after the constitutional framework governing State Election Commissions is harmonised and adequate administrative capacity has been demonstrated. This phased model draws upon the precedents of Germany's partial synchronisation through political consensus and the Philippines' embedded simultaneous election cycle – both of which demonstrate that synchronisation can be achieved progressively without requiring immediate wholesale constitutional restructuring.

B. Safeguarding Federal Democracy

Any implementation of ONOE must incorporate robust constitutional safeguards to protect the federal democratic character of India. These include: strict judicial oversight of any use of Article 356 in connection with synchronisation-motivated dissolutions, which the Supreme Court in *S.R. Bommai* held is subject to full judicial review; mandatory Inter-State Council deliberations prior to the passage of

enabling constitutional amendments to ensure genuine federal consent; statutory protections for the institutional independence of State Election Commissions; and legal mandates ensuring equitable media coverage of regional parties during synchronised campaigns to prevent the nationalisation of state-level electoral discourse identified by scholars as a structural disadvantage of ONOE.¹⁰⁵¹

C. Alternatives to Wholesale ONOE

The paper acknowledges that ONOE, in its full form, may not be politically achievable within the near term given the opposition of a significant bloc of regional parties and state governments. Partial or alternative reforms deserve serious consideration as intermediate measures. A reformed MCC that permits governance continuity during elections – for example, by limiting the MCC's application to the direct electoral constituencies rather than entire states – would substantially reduce governance disruption without requiring constitutional amendment. Campaign finance reforms, including enhanced disclosure norms and public funding of elections, could address the financial excess that ONOE seeks to resolve through a less structurally disruptive route.¹⁰⁵² Constructive no-confidence vote mechanisms, modelled on the German 'constructive vote of no confidence' under Article 67 of the Basic Law, would significantly reduce premature assembly dissolutions and the resultant desynchronisation of electoral calendars.¹⁰⁵³

D. Conclusion

One Nation One Election represents a bold and structurally significant electoral reform that carries genuine promise for India's fiscal efficiency, administrative coherence, and governance stability. The evidence from international comparative experiences,

¹⁰⁵¹Niranjan Sahoo, Will Simultaneous Elections Weaken India's Democratic Spirit? (2021) ORF Occasional Paper No. 285 (arguing that ONOE risks centralising electoral discourse, reducing civic engagement, and weakening participatory democracy by converting continuous accountability into episodic five-year audits).

¹⁰⁵²Agney G.K., Assessing Feasibility of 'One Nation, One Election' in India, 58(45–46) Econ. & Pol. Weekly (Nov. 11, 2023) (cautioning that even under

ONOE, by-elections for casual vacancies would continue to occur, limiting the administrative savings claimed by proponents).

¹⁰⁵³Eesha Shrotriya & Shantanu Pachauri, Simultaneous Elections and Anti-Defection Laws in India, LSE South Asia Blog (Mar. 31, 2025) (arguing that ONOE would require adoption of fixed five-year legislatures and constructive no-confidence motions, potentially destabilising post-poll coalitions if safeguards are weakened).

macroeconomic research, and institutional analysis supports the conclusion that simultaneous elections, if implemented with adequate constitutional safeguards, can reduce electoral costs, limit MCC-driven governance disruption, and enhance voter participation.

However, the constitutional challenges are profound and cannot be minimised. The basic structure doctrine, as articulated in *Kesavananda Bharati* and reaffirmed through a line of Supreme Court jurisprudence, imposes non-negotiable limits on Parliament's power to alter the periodic and representative character of India's electoral democracy. The federal character of India's Constitution, affirmed in *S.R. Bommai* as a basic structure element, demands that ONOE not be implemented through majoritarian fiat but through genuine inter-governmental consensus, transparent deliberation, and state ratification under Article 368(2). The operational lessons from Indonesia warn against underestimating the human and administrative costs of synchronisation at scale.¹⁰⁵⁴

The path to ONOE, if it is to be traversed, must be phased, federally negotiated, institutionally prepared, and constitutionally disciplined. India's electoral reform must not imitate international models mechanically but must adapt them to the specific constitutional architecture, democratic plurality, and federal diversity that make India's democracy one of the most complex and consequential in the world. A reform of the magnitude of ONOE must strengthen India's democratic foundation – not sacrifice it on the altar of administrative convenience.¹⁰⁵⁵¹⁰⁵⁶

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¹⁰⁵⁵Vanthangpui Khobung & Savita Sagar, *One Nation One Election at Crossroad in India*, 6(2) *Int'l J. Pol. Sci. & Governance* 212 (2024) (noting that a succession of commissions—the ECI in 1983, the Law Commission in 1999,

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