

REVISITING JAMMU AND KASHMIR CIVIL SERVICES DECENTRALIZATION AND RECRUITMENT ACT, 2010

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Abstract

Affirmative action by the government is meant to elevate the under-represented sections of society. Affirmative action although discriminate but are positive as they strike to achieve the greater constitutional ethos like equality among all. However, many a times the legislative bodies instead of striving to fulfill the constitutional mandate get swayed by politics and bring lopsided legislations in existence which benefits a section at the cost of others. Like legislation had been enacted by state of Jammu and Kashmir with the purpose to make recruitments at the district level without paying any attention to the existing laws and policies in place. The Jammu and Kashmir Civil Services Decentralization and Recruitment Act, 2010 envisages providing equitable opportunity for employment yet it itself discriminates but not positively. This paper critically evaluates the effects of its provisions on three important lines viz., reservation policy in recruitment, quota for Scheduled Castes and Scheduled Tribes and employment of women married to non-residents.

Keywords - Affirmative Action, inter-district recruitment, women, non-resident, Residents of backward area, Scheduled Castes, Scheduled Tribes and Reservation.

Introduction

Nothing rankles more in human heart than the feeling of injustice at the hands of justice dispensing authorities. Although authorities do not have any magical wand to do equal treatment in mathematical exactitudes among people circumstanced differently, yet substantial negative discrimination always pinches. Affirmative action provides a justified gateway to achieve a greater goal of equality. Equality means that all persons similarly circumstanced shall be treated alike both in privileges

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conferred and liabilities imposed¹. Also the Supreme Court ruled that Article 16(1) envisages equality between members of the same class... but not equality between members of separate, independent class². This norm authorizes the state functionaries to take affirmative actions in favour of those who had faced discrimination since ages. The nations had carved different methods to bring the underprivileged classes in the main stream. In India the reservation policy had been crafted in such a manner as to ensure the representation of marginalized sections of society in the state administration. At present 49.50% of seats are reserved for three categories at the national level. SCs and STs have been allotted a reservation of 15% and 7.50% respectively against the posts at the national level while as 27% of posts have been reserved for OBCs. Owing to topographical reasons the reservation policy in Jammu and Kashmir substantially differs from the reservation in recruitment at the national level. The reservation in Jammu and Kashmir has been laid down under Statutory Rules and Orders (SRO) - 294 Of 2005. The reservation has been provided on the basis of caste among Hindus and tribal people, on the basis of profession and backward areas etc. However, the Jammu and Kashmir had in 2010 banned the recruitment at the state level except for few posts. A new legislation called as Jammu and Kashmir Civil Services Decentralization and Recruitment Act, 2010 has been passed which envisages constitution of three cadres for services viz., district, divisional and state³. Although the statement of objectives talks of equitable distribution of posts, it leaves the reservation policy meant for state level recruitment untouched thereby making reservation for some either meaningless or ensured a few lions share in the recruitment. Besides this the Act had certain major discrepancies either concerning women and other communities.

Historical Background

Unlike the reservation policy of India, the reservation of recruitment in Jammu and Kashmir is not confined to three categories and also differs from it substantially. The reservation in recruitment had met different jolts from time to time until government passed SRO-294 of 2005. However, the government had passed Jammu and Kashmir Civil Services Decentralization

¹ *State of West Bengal v Anwar Ali* 1952 AIR 75, 1952 SCR 284.

² *Kerala v. N.M. Thomas* AIR 1976 SC 490.

³ Section 4, Jammu and Kashmir Civil Services Decentralization and Recruitment Act, 2010.

and Recruitment Act, 2010 to make an equitable distribution of opportunity of employment. The present laws pertaining to reservation in recruitments have passed through a rough through different bodies. The research for a reservation policy began soon after the recommendations of the First Backward Classes Commission popularly known as Kaka Sahib Kalelkar Commission on 29th Jan, 1953 which submitted its report on 30th March, 1955 listing 2399 castes as Socially and Educationally Backward Classes in the country on the basis of criteria evolved by it. In pursuance of the aforesaid commission, the Government of Jammu & Kashmir appointed the committee for identification of Backward Classes in the state in 1956⁴. Again in 1967, Shri P.B. Gajendra Gadkar Commission⁵ was appointed which made a number of recommendations and evolved criteria to be adopted for determining the backward classes in the state. The recommendation no.7 is reproduced as:

The following multiple criteria⁶ may be adopted for determining which classes should be treated as backward:-

- a) The economic backwardness of the classes.
- b) The occupation pursued by that Class of Citizens.
- c) The place of habitation.
- d) The average of student's population per thousand in that class.
- e) Castes, in relation to Hindus.

Pursuant to these recommendations the government of Jammu & Kashmir appointed a Committee under the Chairmanship of Justice J.N. Wazir to draw the list of Backward Classes of Jammu and Kashmir on the basis of criteria relating to social, educational & economical backwardness. Taking note of the report of Backward Classes Committee the Government of J&K framed The J&K Schedule Castes and Backward Classes (Reservation Rules) 1970 which made following reservations⁷:

- a) Schedule Castes-8%
- b) Backward Classes- 42% inclusive of 2% reserved for Ladakh District

⁴ vide Order No: 826-C of 1956.

⁵ Ashok Kumar Basotra, *OBCs of J&K-Fighting for their Fundamental Rights since Independence*, <http://www.countercurrents.org/basotra101008.htm>

⁶ Ibid.

⁷ Ashok Kumar Basotra, *OBCs of J&K-Fighting for their Fundamental Rights since Independence*, <http://www.countercurrents.org/basotra101008.htm>

The Reservation Rules, 1970 were challenged before the Supreme Court of India in *Janki Prasad Parimoo v. State of Jammu & Kashmir*⁸ which stayed the implementation thereof until certain defects, pinpointed by the Court, are not removed. Then the Government of J&K constituted a Committee under the chairmanship of Justice A. S. Anand with a view to remove the defects. Justice A.S. Anand Committee submitted its report in 1977 and Government issued notification⁹ making following reservations in the state:

- 1) Schedule Castes-8%
- 2) Socially and Educationally Backward Classes:
 - a) Weak and Underprivileged Classes
 - i. Gujjars and Backerwals-4%
 - ii. Other Social Castes-2%
 - b) Residents of Backward Areas:
 - i. District Leh-2%
 - ii. District Kargil-2%
 - iii. Other Backward Area excluding Leh and Kargil – 20%
 - iv. Areas near Actual Line of Control-3%
- 3) Children of Freedom Fighters-2%;⁸
- 4) Children of Permanent Residents of Defence Personnel-3%
- 5) Candidates possessing outstanding proficiency in Sports-3%

The efforts at national level so far have been abortive and as an interim arrangement the states have been asked to devise their formula in the meantime and go ahead with their plan for advancement of the backward classes in their states. However, this has given rise to a variety of tests in different states and has given rise to lot of litigation. In order to tackle this problem and to establish a uniform criteria for the determination of socially and educationally backward classes in India, the President under Article 340 of Indian Constitution¹⁰ appointed the Second Backward Classes Commission Known as Mandal Commission on 1st Jan, 1979 which submitted its report on 12 Dec, 1980 and identified as many as 3743 as socially and educationally backward. Out of 3743, the commission identified 63 castes as socially and educationally backward in Jammu and Kashmir. The most important recommendation of the Mandal Commission was the reservation of 27% posts in the government employment.

⁸ AIR 1973 SC 930.

⁹ SRO No. 272 dated 03.07.1982.

¹⁰ Article 340 of Indian Constitution empowers the President to appoint a Commission to investigate into the conditions of backward classes & to ascertain the test of backwardness.

The Constitutional validity of Mandal Commission recommendation was challenged in *Indira Sawhney v. Unoin of India &Ors*¹¹. The Supreme Court upheld the constitutionality of Mandal Commission and directed the Governments of Centre, States and Union Territories to constitute a permanent body for entertaining, examining and recommending upon requests for inclusion and complaints of over inclusion and under inclusion in the lists of other backward classes of citizens. Taking note of this direction the J&K Government appointed the Justice K. K. Gupta Commission. But, unfortunately the appointed Justice K. K. Gupta Commission turned out to be mockery for 63 castes which Mandal Commission had termed as socially and educationally backward within the state of Jammu and Kashmir. Justice K. K. Gupta Commission recommendation turned out to just a carbon copy of Justice A. S. Anand Commission with meager changes¹². The proposal of Commission to make reservation for different categories were later notified vide S.R.O.126 of 1994 dated 28-06-1994 and is as:

- 1) Schedule Castes-8%
- 2) Schedule Tribes- 10%
- 3) Socially and Educationally Backward Classes:
 - i) Residents of Backward Area- 20% (lions share)
 - ii) Residents of area adjoining Actual Line of Control-3%
 - iii) Weak and Underprivileged Classes(social castes)-2%
- 4) Handicapped persons-2%
- 5) Ex Serviceman and Children of Defence Personnel- 5%

The state had created a permanent Commission for Backward Classes and Jammu and Kashmir Act, 2004 was enacted and then reservation rules framed vide S.R.O. 294 in October, 2005. Although these reservation rules have no similitude with recommendation of Mandal Commission recommendations yet they are operational in the state.

Legislative Framework: Constitutional Mandate

The State of Jammu & Kashmir has a unique feature of having its own Constitution. It is only state where both the constitution of India and constitution of Jammu & Kashmir apply simultaneously. Article 16(4) of Indian constitution empowers the state to make special provision for the reservation of

¹¹ AIR 1993 SC 477.

¹² Ashok Kumar Basotra, *OBCs of J&K-Fighting for their Fundamental Rights since Independence*, <http://www.countercurrents.org/basotra101008.htm>.

appointments of posts in favour of any backward class of citizens which in the opinion of the state are not adequately represented in the services of the state. While as the Constitution of Jammu & Kashmir under section 23 provides that the State shall guarantee to the socially & educationally backward sections of the people special care in the promotion of their educational, material and cultural interests and protection against special injustice. Thus, these two provisions are meant for the welfare of the weak and underprivileged section of the society. The Jammu and Kashmir government had enacted the Jammu and Kashmir Reservation Act, 2004 with an object to provide for reservation in appointments and admission in Professional Institutions, for the members of Scheduled Castes, Scheduled Tribes and Other Socially and Educationally Backward Classes. Pursuant to this Act the government made SRO-294 in 2005 to make recruitment at the state level. However, the government in 2010 passed Jammu and Kashmir Civil Services Decentralization and Recruitment Act, 2010 envisaging recruitments at three levels viz., district, division and state. The various provisions of the Act, 2010 are discussed ahead under different heading. The reservation policy as laid in SRO-294 Of 2005 as shown in the table:

S.No.	Category	Reservation quota (%)
1.	SCs	8
2.	STs	10
3.	Socially & Educationally Backward Classes	I. WUP (social castes) = 2 II. ALC = 3 III. RBA = 20
4.	Ex. Servicemen	6 (Horizontal Reservation)
5.	Physically Challenged Persons	3 (Horizontal Reservation) (i) Blindness or low vision ... 1 (ii) Hearing impairment ... 1 (iii) Locomotor disability or Cerebral Palsy ... 1
Total		43

Jammu & Kashmir Civil Services Decentralization and Recruitment Act, 2010

The state of Jammu and Kashmir is reeling under the various socio-political and economic problems. The confusion and suspense on the reservation policy in Government jobs has intensified in the recent past. The Jammu & Kashmir Civil Services Decentralization and Recruitment Act-2010 banning the inter-district recruitment except Schedule Castes in the state have

further added fuel to the fire. Besides this the Act does not talk of reframing reservation policy in view of high or very low proportionality of particular sections entitled to reservation in recruitment. The various provisions of the Act have been critically analyzed below:

Object of the Act

The inter-district recruitment had been enacted with an object to provide for equitable opportunities of employment in the Civil Services in the state keeping in view its complex socio-economical and geographical/topographical/linguistic/security concerns.

Resident of a State

The Act envisages that a person is eligible against a district or division cadre post provided he is a permanent resident of the state and a resident of district¹³ or division¹⁴ in which post had been notified. As to who is the permanent residents had been defined under the Constitution of Jammu and Kashmir¹⁵ although Act makes no reference to it. However, the Act defines the resident of district or division as any person who has resided in such district or division, as the case may be, for a period of not less than 15 years before the date of applying for a particular post and is actually residing in the said area¹⁶. The word actually had not been defined under the Act and thus remains ambiguous. The condition that applicant must be resident of particular district or division led to hardship to women as they found themselves as ineligible as soon as they get married in another district or division. The validity of this section was challenged before Hon'ble High Court of Jammu and Kashmir in public interest litigation¹⁷ on the grounds that minimum 15 years period is discriminatory so far it pertains to the married women. It was stated that it is discriminatory of Articles 14 & 15 of the Constitution of India. The Court directed the state to address the issue within three months from the disposal of Public Interest litigation. Pursuant to court directions The Jammu and Kashmir Civil Services

¹³ Section 6, The Jammu & Kashmir Civil Services Decentralization and Recruitment Act-2010.

¹⁴ Section 7, The Jammu & Kashmir Civil Services Decentralization and Recruitment Act-2010.

¹⁵ Section 6 to 10, Constitution of Jammu and Kashmir.

¹⁶ Section 13, Jammu & Kashmir Civil Services Decentralization and Recruitment Act, 2010.

¹⁷ PIL 27/2011 titled "*Sewa National Service Organisation v State of Jammu and Kashmir and Others*".

Decentralization and Recruitment (Amendment) Act, 2013 was enacted and sub-section (4) to section 13 was added to the Act which reads as:

Section 13 (4): Notwithstanding anything contained in sub-section (1), if a woman marries outside her District/Division, the period of residence of 15 years under the said sub-section (1) shall not operate as a bar for applying to a post provided that her husband has resided in that District/Division, as the case may be, for a period not less than 15 years¹⁸.

Although apparently it seems that after the addition of above provision the controversy with regard to married women had been set at rest for ever but the point of contention is that eligibility of those women who marry to non-permanent resident of the state stands yet unsettled by the Act. Earlier the Jammu and Kashmir High Court in case of *Dr. Susheela Sawhney v. State of Jammu and Kashmir*¹⁹ held that women marrying a non-resident state are not barred to apply and get recruited in the state. However, Section 13(1) and its exception under sub-section (4) had tacitly barred the women marrying a non-resident to apply against any post under district or divisional cadre because it expressly mentions that "... provided that her husband has resided in that District/Division, as the case may be, for a period not less than 15 years". This condition cannot be fulfilled by women married to non-residents hence stand barred from applying against any post of district or divisional cadre. On this point state has to relook into the Act.

Inter-District Recruitment vis-a-vis Reservation policy

Reservation policy in the State of Jammu and Kashmir had been drafted only after a number of Commissions had submitted reports from time to time. It is pertinent to highlight that reservation policy had been drafted in view of population of the state and not that of a district or a division. 20% reservation to residents of rural backward areas may be justified in view of population in comparison to total population of the state. And so may be justified the reservation of other categories like Scheduled Castes, Scheduled Tribes, Residents of Actual Line of Control etc. Now, when recruitment is to be made at district and divisional

¹⁸ The Jammu and Kashmir Government Gazettee available at <http://jklegislativecouncil.nic.in/Governor/BILLS%20TRANSMITTED/Bill%20No.2.pdf>.

¹⁹ AIR 2003 JK 83.

level the relevance of reservation policy drafted for state level becomes questionable. The law has been made with an intention to provide equitable opportunity of employment to all. The law in turn had in fact in certain districts made reservation either redundant or lopsided providing a few lions share in the employment. For example as per census 2011, the district Srinagar had a total population of 1236829 and population of rural backward areas eligible under RBA category as per SRO-294 of 2005 is just 5077. The Dara (population= 3177) and FaqirGujri (population= 1900) fall under RBA category and constitute 0.41% of total population of Srinagar. This 0.41% of population of two villages in Srinagar takes a share of 20% reservation quota during recruitment which cannot be justified under any law or legal policy as reflective of equitable distribution of posts. Only three villages earmarked as Rural Backward Area under SRO-294 of 2005 are Dara, Faqir Gujri and Sangri Chek (parts of Khanmou)²⁰. The Census 2011 does not figure out any village by the name of Sangri Chek. However, if whole population of Khanmou is taken as RBA as per SRO-294 Of 2005 (which is not correct), even then total population under RBA category would be 7741 which will constitute 0.62% of total population of Srinagar. Thus in either case a population of less than 1% had been allotted a quota of 20% which is highly disproportionate. A few district had adverse position with respect to recruitment. The Act had made reservation for such districts either cumbersome or meaningless. For example whole district of Leh as per SRO-294 Of 2005 had been earmarked as Rural Backward Area for the purpose of recruitment, this in turn makes reservation at district level meaningless. The people living in far-of places in Leh had to compete with those living in main city of Leh on the same and similar basis.

The figures show that reservation at district level contravenes the reservation of 20% under the category of RBA. It must be kept in view that bad pocket doctrine may have much relevance in some districts but it has no universal applicability with respect to all districts of the state. The reservation on the basis of residence solely ignoring the constitutional mandate of providing reservation to socially and educationally backward classes {Article 15(4)} who in the opinion of the state are not adequately represented in the government services [Article 16(4)] is highly unjustified especially when the reservation are to be made at the district level. The Supreme of India in case of *Triloki Nath v. State of Jammu and*

²⁰ SRO-294, J&K Gazette 21st Oct., 2005.

*Kashmir*²¹ (1969) held that the of posts for appointment on the basis of community or place of residence was not sanctioned by Article 16(4) and was against the constitutional guarantee set forth in classes (1) & (2) of Article 16.

The Hon'ble Supreme Court in *Janki Prasad Parimoo v. State of Jammu & Kashmir*²² stressed for the similarity of a class to be considered as backward to that of Scheduled Castes and Scheduled Tribes in the following words:

“Mere educational backwardness or social backwardness which makes a class of citizens as backward is not enough. The class identified as backward class must be both socially and educationally backward... Backward class must be comparable to the schedule castes and schedule tribes”.

Thus, a synonymy in educational and social conditions with the schedule castes and schedule tribes becomes the first imperative condition to a class of citizens to be adjudicated as backward class. The areas identified as the backward area for the purpose of reservation by Jammu & Kashmir State Backward Classes Commission, succumbing to political pressure, does not have any resemblance with schedule castes and schedule tribes. Although the Hon'ble Supreme Court of India in *Janki Prasad Parimoo v. State of Jammu & Kashmir*²³ affirmed the reservation on the basis of bad pockets doctrine based on certain criteria yet it issued a note of caution of misuse by imposters. The Court observed that:

“The committee came to the conclusion that owing to lack of communication, inaccessibility, lack of material resources and the like the residents of these areas are living in almost primitive conditions and they are socially and educationally backward. The civilizing influence of modern life is yet to reach them. These areas are carefully mapped”.

However, the relevance of grounds on which reservation for bad pockets was validated needs to re-checked after a gap of four decades. The relevance needs to be relooked on the ground that development had permeated all the regions of the state. Further, reservation of 20% on rural backward areas needs to be overhauled in view of the fact that number of districts have been considerable increased and most people claiming reservation under this category are living at a stone's throw distance from

²¹ AIR 1969 SC 1.

²² AIR 1973 SC 930.

²³ AIR 1973 SC 930.

their district headquarters in view of newly developed roads and means of communications.

The reservation quota of 3% on the basis of Actual Line of Control is meaningless for a large number of districts who don't touch Actual Line of Control.

Reservation for SCs and STs under the Act: A comparison

As per the census of 2011 the Scheduled Caste population in Jammu and Kashmir is 9,24,991 which constitute 7.37% of total population of the state while as Scheduled Tribe population in the state is 14,93,299 which constitute 11.90% of total population in the state. The state reservation of 8% and 10% for SCs and STs respectively is to a great extent reflective of their population ratio in the state yet it needs rectification on the point that SCs have more share in quota compared to their population ratio while STs share is not adequate.

The Act envisages recruitment at district level apart from divisional and state level. But the population ratio of SCs and STs is not reflective their reservation quota in their respective districts as is shown in the table below:

Sr. No.	Name of District	Total population	Total population SCs	Ratio SCs population to district population	Total population STs	Ratio STs population to district population
1	Kupwara	870354	1048	0.12	70352	8.08
2	Badgam	753745	368	0.048	23 912	3.17
3	Leh	133487	488	3.65	95,857	71.80
4	Kargil	140802	18	0.012	122336	86.88
5	Punch	476835	556	0.11	176101	36.93
6	Rajouri	642415	48157	7.49	232815	36.24
7	Kathua	616435	141224	22.90	53307	8.64
8	Baramulla	1008039	1476	0.14	37705	3.74
9	Bandipora	392232	392	0.099	75374	19.21

10	Srinagar	1236829	1068	0.08	8935	0.722
11	Ganderbal	297446	117	0.039	61070	20.53
12	Pulwama	560440	402	0.071	22607	4.033
13	Shupiyan	266215	43	0.016	21820	8.19
14	Anantnag	1078692	1826	0.16	116006	10.75
15	Kulgam	424483	21	0.004	26525	6.24
16	Doda	409936	53408	13.02	39216	9.56
17	Ramban	283713	13920	4.90	39772	14.01
18	Kishtwar	230696	14307	6.20	38149	16.54
19	Udampur	554985	138569	24.96	56309	10.14
20	Reasi	314667	37757	11.99	88365	28.08
21	Jammu	1529958	3,77,991	24.70	69193	4.52
22	Samba	169124	91835	54.30	17573	10.39
Total in J&K		12541303	924991	7.37	1493299	11.90

Source: Census 2011

The above comparative reservation ratio of SCs and STs clearly reflects that recruitment at district level is not in consonance with reservation policy of state. The objectives of Act when tested at the ground level speak volumes about their discrepancies especially its (equitable) proportionality also envisaged by Article 16(4). The population ratio of SCs to that of respective districts is below 1% in 12 districts and in 4 districts it had not touched 8%, the reservation quota available for them. It is only in six districts where SCs population ratio to their respective district population is above the quota of reservation meant of them. These 6 districts are Kuthua (22.90), Doda (13.02), Udampur (24.96), Reasi (11.99), Jammu (24.70) and Samba (54.30). On the other hand population ratio of STs to respective district population in 12 districts is above the reservation quota of 10 % meant for them. It is only in one district namely Srinagar where population ratio of STs is below 1%. In other 9 districts it is above 1% and almost touching reservation quota of 10% allotted to them.

The population of Schedules Castes in many districts, as discussed above, is below 8% of the total population of the respective district. The reservation of SCs as envisaged by Act is not proportionate but over and above their population ratio. On the other Scheduled Tribes had a population of 1493299 which is 11.90% of total population of Jammu and Kashmir. They have been given a quota of 10% posts in the recruitment as per SRO-294. Further it is pertinent to highlight here that the Schedules Caste category candidates are eligible to apply against any cadre irrespective of their residence²⁴. The reservation quota of 8% in each district means that SCs had a reservation of 176% to that of 10% for STs. Although STs bear semblance with SCs and constitute 4.53% more population than SCs to total Jammu and Kashmir population yet the Act makes only SCs to apply in any district. It is in clear violation of basic object of the Act which had been created to ensure equitable opportunities of employment to all residents of the state. This discrimination from category to category also runs contrary to the basic philosophy of constitutional mandate of affirmative actions. This is also in contravention to reservation policy which is democratic in nature meaning that every category/ community must have equal representation in the state; 8 administration²⁵.

Conclusion and Suggestions

The immediate need of the hour is to overhaul the provisions of Jammu & Kashmir Civil Services Decentralization and Recruitment Act, 2010 with a view to infuse a prudent policy addressing the issues which make it a mockery on the name of recruitment. It needs to address the issues pertaining to women marrying a non-resident which had already met different responses from the corridors of judiciary. Also this piece of legislation needs to take in consideration the reservation policy operational at state level otherwise equitable distribution of opportunity in recruitment remains in name only. Further reservation to Schedules Castes in each district without taking in consideration their share is also big blot in view of the fact that Scheduled Tribes which bear resemblance with them are denied the same. Thus there is a need to reframe the Act and same shall be done in the light of following suggestions:

²⁴ Section 13(3), Jammu & Kashmir Civil Services Decentralization and Recruitment Act, 2010.

²⁵ Article 16(4), Constitution of India.

- a. The reservation in districts shall be proportionate to population of a particular community in a district so as to ensure equitable distribution of opportunity in recruitment.
- b. The reservation on the bad pockets doctrine shall be relooked in view of the fact that the development and access to means is not alien to any region of Jammu and Kashmir.
- c. The tacit hardships created by Act for women married to a non-resident of Jammu and Kashmir shall be addressed in view of the judgment of Jammu and Kashmir High Court in *Dr. Susheela Sawhney v. Union of India*.
- d. The reservation of 8% for SCs shall be barred with immediate effect and reservation for SCs and STs shall be given as per their population ration in every district.
- e. The OBC's in Jammu & Kashmir as listed by Mandal Commission shall be given equitable proportion in the reservation in view of their population ratio in each district.

