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Legal Protection to Agricultural Labourers in the State of Andhra Pradesh: A Constitutional, Statutory and Judicial Appraisal

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Abstract

Agricultural labourers form the largest single workforce in rural Andhra Pradesh, yet the law that protects them was designed mainly for factories, mines and plantations. This paper examines how far the legal framework operating in the State, from the Constitution down to the executive order, protects the agricultural labourer in practice. Using a doctrinal method supplemented by a socio-legal reading of official reports, government data and field studies, it traces the constitutional foundations, including the Ambedkarite understanding of the agrarian question, and surveys the national statutes now in force: the Code on Wages, 2019, the employment guarantee under the VB-G RAM G Act, 2025, the Bonded Labour System (Abolition) Act, 1976, and the Atrocities Act, 1989. It then reviews the State's own architecture of land laws, half-yearly wage notifications, the Code on Wages (Andhra Pradesh) Rules, 2026, the social audit of the employment guarantee, the Amaravati landless pension and the Sub-Plan Act of 2013, and assesses the judicial contribution from People's Union for Democratic Rights to the High Court's order of 2009 on the guarantee wage.

The paper finds that protection exists on paper but is weakened by four structural gaps: the absence of an identifiable employer and of records for casual work; the division of wage-setting between the Union and the State; the vulnerability of the employment guarantee to pauses, cost-sharing and technological exclusion; and the persistence of caste and gender discrimination in the labour market. Localised measures such as the Amaravati pension recognise displacement but do not generalise, and Andhra Pradesh has no dedicated statute for the agricultural labourer. The paper proposes a State Agricultural Workers Act on the Kerala model, a mandal-level enforcement mechanism built on the social audit, a State registry linked to e-Shram, a livelihood package for changes in land use, and heat and pesticide protocols.

Keywords: agricultural labour; Andhra Pradesh; minimum wages; employment guarantee; social audit; Ambedkar

1. Introduction

The agricultural labourer is the most numerous and the least visible worker in the rural economy of Andhra Pradesh. In the Godavari and Krishna deltas she transplants paddy; around Guntur and in the Palnadu belt he picks chilli and strips cotton; along the coast the same household may be found clearing aquaculture ponds the following month. Such a worker sells nothing but labour. Unlike the owner-cultivator, who has

title, credit and a political voice, or even the oral tenant, who has some claim on the crop, the landless wage earner holds only a daily rate, negotiated, if at all, at the village junction in the early morning.

The Constitution of India promised this worker a good deal more than she has received. Its Preamble pledges justice, social, economic and political; its Directive Principles speak of an adequate means of livelihood, a living wage and conditions of work that secure a decent standard of life. Yet agriculture is a State subject under Entry 14 of List II, labour welfare is shared between the Union and the States through the Concurrent List, and the labour law that grew up in twentieth-century India was built around the factory, the mine and the plantation. Law reached the factory gate long before it reached the field boundary, and in several respects it has still not crossed it.

The question this paper asks is therefore not whether protective law exists for the agricultural labourer in Andhra Pradesh. It does, and in some volume: constitutional guarantees, Central statutes on wages, bonded labour, social security and caste atrocities, State enactments on land, executive orders fixing wage rates, and a steady line of judicial decisions. The real question is how coherent, enforceable and effective this body of law is for a worker who has no employer's name on a pay slip, no written terms of engagement and no fixed place of work.

Andhra Pradesh is an instructive setting for such an inquiry for three reasons. First, a large share of its workforce continues to depend on agriculture and allied activities, and agricultural labour households are drawn disproportionately from the Scheduled Castes, Scheduled Tribes and Backward Classes. Secondly, the State has built institutions that attracted national attention, the independent social audit of the rural employment guarantee being the best known. Thirdly, its agrarian landscape has changed quickly through commercial crops, aquaculture, mechanisation, tenancy reform and large-scale land pooling for the new capital region, and each of these changes alters the bargaining position of the labourer in ways the law has been slow to recognise.

Objectives. The study pursues five objectives:

1. to trace the constitutional basis of protection for agricultural labour and its judicial elaboration;
2. to examine the Central and State laws that operate on the farm worker in Andhra Pradesh;
3. to assess how far the State's administrative machinery makes these protections real;
4. to identify the structural and institutional gaps that persist; and
5. to propose a workable reform agenda for the State.

Method and scope. The paper is primarily doctrinal. It analyses the Constitution, statutes, subordinate legislation, government orders and reported judgments, and reads them alongside official reports, government data and the scholarly literature on rural labour. A socio-legal perspective is adopted throughout, because the efficacy of a labour law cannot be judged from its text alone. The paper does not rest on a fresh field survey; its empirical observations are drawn from published sources and should be read as indicative. The expression 'agricultural labourer' is used, as in the Census, for a person who works on another's land for wages in cash or kind and bears no risk of cultivation. Cultivators and tenants are discussed only where their position conditions that of the labourer. References to Andhra Pradesh denote the State as reconstituted by the Andhra Pradesh Reorganisation Act, 2014, although some older data relate to the composite State.

Organisation. Section 2 describes the agrarian setting and the labourer's socio-economic profile. Section 3 examines the constitutional foundations, including the thinking of Dr. B.R. Ambedkar behind them. Section 4 surveys the national statutory framework and Section 5 turns to the legal and administrative

architecture of Andhra Pradesh itself. Section 6 reviews judicial contributions, Section 7 offers a critical appraisal, Section 8 sets out proposals for reform, and Section 9 concludes.

2. The Agrarian Setting and the Agricultural Labourer in Andhra Pradesh

2.1 Who counts as an agricultural labourer

Indian law has no single definition of the agricultural labourer, and the available definitions do not coincide. The Census, which supplies most of the numbers, treats as an agricultural labourer anyone who works on another person's land for wages in cash, kind or crop share, carries no risk of cultivation and holds no lease or contract right over the land (Census of India, 2011). The Minimum Wages Act, 1948 draws a wider net. Part II of its Schedule covers employment in agriculture in the broadest sense: farming and tillage, dairy work, the raising of livestock, bees and poultry, the growing and harvesting of agricultural and horticultural produce, and practices incidental to farm operations. The wage notifications of Andhra Pradesh then sort farm employees into adult farm servants, casual labour and tractor drivers, with rates that vary by zone (WageIndicator, 2026).

The categories therefore overlap without matching. A farm servant engaged for the year is an employee for the purposes of wage law but may be recorded elsewhere in the Census tables. A small cultivator who hires out his labour in the lean months is a cultivator for the Census and a wage earner for the day. These mismatches are not pedantic. They decide who can claim a statutory entitlement and who cannot.

2.2 Numbers and social profile

In the composite State, the 2011 Census counted 16.97 million agricultural labourers against 6.49 million cultivators. Between 2001 and 2011 the labourers had increased from 13.83 million while the cultivators fell from 7.86 million, so that labourers formed about 72 per cent of all agricultural workers (Lok Sabha Unstarred Question 373, 2020, Annexure II). The national picture was similar, with 144.33 million labourers against 118.81 million cultivators. For the residual State, survey data show that 44.51 per cent of usually working persons were engaged in agriculture, forestry and fishing in 2022-23, close to the all-India figure of 45.76 per cent (Rajya Sabha Unstarred Question 2012, 2024). Whatever else has changed, farm work remains the largest single source of employment in the State and, on the 2011 pattern, wage labour is its dominant form.

The composition of this workforce matters as much as its size. Research on the State's agrarian economy has documented the persistence of unfree labour relations and the feminisation of farm work (Da Corta and Venkateswarlu, 1999). Field accounts from Guntur district describe landless Dalit households, mostly of the Mala community, who depend on farm wages. When agricultural work around Amaravati dried up after land pooling, some of them travelled thirty to forty kilometres to cut chilli in a season that offered fifty to seventy days of work (Maganti, 2019). The Tsundur violence of 1991, also in Guntur district, was preceded by a social boycott that kept Dalit workers out of the fields of upper-caste landholders and cancelled Dalit tenancies (India Together, 2014). Work, in other words, is not only an economic relation in the Andhra countryside. It is a channel through which caste authority is exercised, and the withdrawal of work is a sanction.

The law must therefore protect a workforce that is very large, seasonal, mobile, caste-marked and increasingly female, and that deals with its employers without a written word. That single fact explains much of what follows.

3. Constitutional Foundations

3.1 What the text says

The Constitution speaks to the agricultural worker more directly than is usually noticed. Article 43 calls on the State to secure for "all workers, agricultural, industrial or otherwise" work, a living wage and conditions of work that ensure a decent standard of life. Article 38(2) directs the State to minimise inequalities of income and status, and Article 39 points State policy towards an adequate means of livelihood for all citizens, the equitable distribution of material resources, equal pay for equal work for men and women, and the protection of the health and strength of workers. Article 41 speaks of the right to work and to public assistance, Article 42 of just and humane conditions of work and maternity relief, and Article 46 of the promotion, with special care, of the economic interests of the Scheduled Castes, the Scheduled Tribes and other weaker sections, and of their protection from social injustice and all forms of exploitation.

Part III supplies the enforceable core. Article 17 abolishes untouchability, a prohibition of real consequence where caste decides who is hired, on what terms and by whom. Article 19(1)(c) refers to form associations and unions. Article 21 guarantees life and personal liberty, which the Supreme Court reads to include livelihood and a life of human dignity. Article 23 – Pt2 prohibits traffic in human beings, begar and other forms of forced labour, and it binds private persons as well as the State. Article 24 forbids the employment of children below fourteen in factories, mines and other hazardous work. The Directive Principles cannot be enforced in court, but the Court has long used them to give content to the fundamental rights, a development taken up in Section 6.

3.2 Who may legislate

The scheme of the Seventh Schedule creates a difficulty. Agriculture and land are State subjects (List II, Entries 14 and 18), whereas trade unions, industrial and labour disputes, social security, and the welfare of labour including conditions of work are on the Concurrent List (List III, Entries 22 to 24). The Eleventh Schedule, added in 1992, lists agriculture, land improvement and poverty alleviation among the subjects that a State may entrust to its panchayats. A protective regime for farm labour must therefore be built jointly. The Union can legislate on wages, security and welfare for workers generally, but the field, the land and the village institutions belong to the State. Where each defers to the other, the labourer falls into the gap between them.

3.3 The Ambedkarite foundation

Dr. B.R. Ambedkar, who chaired the Drafting Committee, treated the agrarian question as a question of caste as much as of class, and his work offers the sharpest framework for judging the legal position of the landless worker. As early as 1918 he argued that rural poverty in India could not be cured merely by enlarging holdings, since it came from a want of capital and a surplus of people on the land (Ambedkar, 1918). He founded the Independent Labour Party in 1936. In 1937 Ambedkar introduced in the Bombay Legislative Assembly a Bill to abolish the khoti tenure in the Konkan. In States and Minorities (1947) he proposed that agriculture be organised as a State industry, with land leased to villagers for collective cultivation without distinction of caste, so that the landless Scheduled Caste labourer would no longer depend on the landholder's favour (Ambedkar, 1947).

As Labour Member in the Viceroy's Executive Council he also introduced the Minimum Wages Bill in the Central Legislative Assembly on 11 April 1946. Delayed by constitutional change, the Bill became the Minimum Wages Act, 1948, whose Schedule includes agriculture (International Labour Office, 1949). In his closing speech to the Constituent Assembly on 25 November 1949 he warned that a Republic which

gave equality in politics while leaving inequality in social and economic life untouched would put its own democracy in peril (Constituent Assembly Debates, vol. XI).

For present purposes the Ambedkarite point is simple. Formal equality before the law, without enforceable social and economic rights, leaves the landless worker where he was. The test of legal protection for agricultural labour in Andhra Pradesh is therefore not the number of statutes on the books but whether they change the daily bargain between the labourer and the landholder.

4. The National Statutory Framework Operating in Andhra Pradesh

4.1 Wages: from the Minimum Wages Act to the Code on Wages

The Minimum Wages Act, 1948 first brought farm wages within statute. Its Part II covered employment in agriculture, although the Statement of Objects and Reasons conceded that fixing agricultural rates would be administratively harder and allowed a longer period for the first fixation. The State Government was to fix minimum rates, review them at intervals not exceeding five years (the old rates continuing until revised), and consult committees and an advisory board with equal representation of employers and employees. A worker paid less than the notified rate could apply to a claims authority, ordinarily within six months, for the shortfall and compensation up to ten times that sum. Any agreement to accept less was void, and wages were to be paid in cash unless the Government authorised payment in kind (ss. 3, 5, 7, 11, 20 and 25). For decades, then, an agricultural labourer in Guntur had on paper a statutory minimum, a forum and a remedy.

That framework has now been superseded. The Code on Wages, 2019 came into force with the other three labour codes on 21 November 2025, and the Central Rules followed on 8 May 2026 (KPMG, 2026). The Code extends minimum wages to employees generally instead of confining them to scheduled employments, provides for a floor wage fixed by the Union, prohibits gender discrimination in wages, and replaces the inspector with an Inspector-cum-Facilitator. Andhra Pradesh notified the Code on Wages (Andhra Pradesh) Rules, 2026 on 29 June 2026 (G.O.Rt. No. 124), superseding its Payment of Wages Rules of 1937 and Minimum Wages Rules of 1960. The Rules fix the minimum rate by the day, derive the hourly and monthly rates from it, require the variable dearness allowance to be recomputed before 1 April and 1 October each year, and allow one application on behalf of a group of workers to be filed by the workers themselves, a registered trade union or an Inspector-cum-Facilitator. An employer who appeals against an award must first deposit the claim amount (rr. 3, 4, 40 and 41).

4.2 The employment guarantee

In 2005 through MNREGA gave rural household for unskilled manual work a statutory claim to a hundred days of employment, with an unemployment allowance and compensation for late wages. It has been replaced by the Viksit Bharat-Guarantee for Rozgar and Ajeevika Mission (Gramin) Act, 2025, which received the President's assent on 21 December 2025 and came into force on 1 July 2026. The Act raises the guarantee of 125 days and given unemployment allowance. It also makes the programme a centrally **Pt3** sponsored scheme in which the Union and most States share costs in the ratio 60:40, lets the State announce in advance a period of up to sixty days in the year when works will not be taken up, so that peak sowing and harvesting are not starved of labour, and relies on biometric authentication and geospatial monitoring (PRS Legislative Research, 2025). The wage notified for Andhra Pradesh from 1 July 2026 under section 10 is Rs 312 a day (SCC Times, 2026). The scheme was formally launched in the State at Mukkavaripalli village in Tirupati district on 2 July 2026 (PTI, 2026).

4.3 Bonded and forced labour

Article 23 took statutory form in the Bonded Labour System (Abolition) Act, 1976. The Act abolished the system, extinguished bonded debts, voided related agreements and property charges, made the enforcement of bonded labour an offence, and made district magistrates and vigilance committees responsible for implementation. Central assistance for rehabilitation has existed since 1978 and was recast as a central sector scheme in 2016. Official figures show that by 31 March 2019 Andhra Pradesh had identified and released 38,141 bonded labourers and rehabilitated 31,687 (Lok Sabha Unstarred Question 345, 2019). The difference of 6,454 is explained in the national statement only in aggregate, as persons who have died or cannot be traced. These totals largely reflect the identification drives of earlier decades. They say little about debt-tied seasonal and migrant arrangements, which begin as advances rather than as bonds and are harder to see for that reason (Breman, 1996; Da Corta and Venkateswarlu, 1999).

4.4 Social security and food

The Unorganised Workers' Social Security Act, 2008 has been absorbed into the Code on Social Security, 2020, now also in force. Both rest on an enabling model: security reaches the unorganised worker through schemes that governments notify and fund, not through an entitlement enforceable against an employer. The practical gateway is the e-Shram database, which had registered 31.78 crore workers nationally by 14 July 2026, of whom 88.8 lakh were in Andhra Pradesh (Press Information Bureau, 2026). In March 2025 agriculture accounted for 15.99 crore of 30.68 crore registrations, roughly half (Press Information Bureau, 2025). Registration allows enrolment in accident and life insurance schemes, but it is not itself a benefit. The National Food Security Act, 2013 supplies a more dependable layer by entitling priority households to subsidised foodgrain.

4.5 Caste, gender, children and safety

Several other laws bear on the farm worker without having been written for her. The Protection of Civil Rights Act, 1955 and the SC and ST (Prevention of Atrocities) Act, 1989 penalise, among other acts, compelling a member of these communities to perform begar or bonded labour and wrongfully occupying land allotted to them. The latter was strengthened in 2015, and after the Supreme Court diluted its arrest provisions in Dr. Subhash Kashinath Mahajan v. State of Maharashtra (2018) 6 SCC 454, Parliament restored them, a restoration upheld in Prathvi Raj Chauhan v. Union of India (2020) 4 SCC 727.

On gender, the Code on Wages forbids discrimination in pay, but the maternity provisions inherited from the Maternity Benefit Act, 1961 were built around factories, mines, plantations, shops and similar establishments and have little purchase on casual field work. The Child and Adolescent Labour (Prohibition and Regulation) Act, 1986 amended in 2016, bars employment of children below fourteen but lets them help in family enterprises outside school hours, an exception that sits uneasily with documented child employment in hybrid cottonseed production in the State (Venkateswarlu and Da Corta, 2001). The Occupational Safety, Health and Working Conditions Code, 2020 is designed for factories, mines, construction and plantations rather than open-field farm work, and the Insecticides Act, 1968 regulates pesticides as products and articles of trade, not the safety of the person who sprays them.

4.6 International standards

India is bound by the ILO conventions on forced labour (Nos. 29 and 105), equal remuneration (No. 100) and discrimination in employment (No. 111), and since 2017 by those on minimum age (No. 138) and the worst forms of child labour (No. 182). It is also a party to the International Covenant on Economic, Social and Cultural Rights, which guarantees fair wages, safe working conditions and social security. The UN Declaration on the Rights of Peasants and Other People Working in Rural Areas, adopted in December

2018, is not binding but offers a useful benchmark. These instruments help courts to read Articles 21 and 23, though they create no enforcement machinery of their own.

Table 1. Principal national protections and their reach

Instrument	What it offers the farm worker	Principal limitation
Code on Wages, 2019; AP Rules, 2026	Minimum wage, timely payment, equal pay, claim and appeal	Presumes an identifiable employer, registers and wage slips
VB-G RAM G Act, 2025	125 days of work; Rs 312 a day in Andhra Pradesh; unemployment allowance	60:40 cost sharing; seasonal pause; biometric dependence
Bonded Labour System (Abolition) Act, 1976	Release, extinction of debt, rehabilitation	Depends on official identification
Code on Social Security, 2020; e-Shram	Registration, insurance and pension schemes	Scheme-based; no entitlement enforceable against the employer
SC/ST (Prevention of Atrocities) Act, 1989	Penalties for forced labour and land grabbing	Depends on investigation and trial

5 scheme rules. A labourer displaced by an aquaculture pond, an industrial park or a highway has no comparable claim.

5.5 Caste, courts and the Sub-Plan

Because Scheduled Caste and Scheduled Tribe households form a large part of the farm labour force, the machinery of the Atrocities Act is in practice part of labour protection. As strengthened in 2015, the Act provides for Exclusive Special Courts, or designated Courts of Session where cases are few, with Special Public Prosecutors, so that trials move quickly. The record is uneven. The killing of eight Dalits at Tsundur in Guntur district in August 1991, which followed a social boycott that shut Dalit workers out of the fields, reached judgment in a Special Court only in 2007. The High Court set aside the convictions in April 2014, and the Supreme Court later stayed that order (India Together, 2014; IANS, 2019).

The Andhra Pradesh Scheduled Castes Sub-Plan and Tribal Sub-Plan (Planning, Allocation and Utilization of Financial Resources) Act, 2013 (Act 1 of 2013) was enacted to ensure that development funds are planned, allocated and spent for these communities. It creates no entitlement for the labourer as such. It does give the State a statutory channel through which livelihood schemes can be financed for the communities from which agricultural labour is disproportionately drawn.

6. The Judicial Contribution

The courts have done more than the legislatures to give the constitutional promise some content for the farm worker. In People's Union for Democratic Rights v. Union of India (1982) 3 SCC 235 the Supreme Court held that the State, as principal employer, must see minimum wage laws observed even where workers are engaged through a contractor, and that labour supplied for less than the minimum wage is 'forced labour' under Article 23, since a person driven by want has no real choice. Sanjit Roy v. State of

Rajasthan (1983) 1 SCC 525 applied the same reasoning to drought-relief works where a State exemption law had allowed sub-minimum pay, and refused to let the State profit from the helplessness of the hungry. Bandhua Mukti Morcha v. Union of India (1984) 3 SCC 161 held that where forced labour is shown, bondage is to be presumed unless the employer proves otherwise, and Neeraja Chaudhary v. State of Madhya Pradesh (1984) 3 SCC 243 added that release without rehabilitation is no release at all.

Livelihood and dignity received separate attention. Francis Coralie Mullin v. Administrator, Union Territory of Delhi (1981) 1 SCC 608 and Olga Tellis v. Bombay Municipal Corporation (1985) 3 SCC 545 treated the bare necessities of life and the means of livelihood as parts of the right to life. That reasoning allows the loss of farm work to be seen as a constitutional injury and not merely an economic one. The Directive Principles were drawn in as well: Randhir Singh v. Union of India (1982) 1 SCC 618 read equal pay for equal work into Articles 14 and 16, and Consumer Education and Research Centre v. Union of India (1995) 3 SCC 42 treated a worker's health as part of the right to life. The minimum wage itself had been defended earlier. Bijay Cotton Mills Ltd. v. State of Ajmer AIR 1955 SC 33 upheld the Minimum Wages Act as a reasonable restriction on the freedom of trade, Unichoyi v. State of Kerala (1961) 1 LLJ 631 held that an employer's inability to pay is no answer to a minimum wage, and Workmen v. Reptakos Brett & Co. Ltd. (1992) 1 SCC 290 described the minimum wage as need-based, with a further 25 per cent for education, medical care and recreation.

The employment guarantee has produced its own line of cases. In the third part of Swaraj Abhiyan v. Union of India, decided on 13 May 2016, the Court directed the Union to ensure compensation for wages delayed beyond fifteen days (LiveLaw, 2016). On 18 May 2018 it ordered the Centre to prepare an urgent, time-bound programme for prompt payment and placed the burden of compliance on the Union and the States alike (The Quint, 2018).

In Andhra Pradesh the guarantee wage itself reached the High Court. After the Union fixed the programme wage by a notification of 1 January 2009, the Andhra Pradesh Vyavasaya Vruthidarula Union, the State's agricultural workers' union, challenged it. In July 2009 Justice N. Ramamohana Rao directed, by an interim order for eight weeks, that the wage be raised from Rs 80 to the State's minimum agricultural wage of about Rs 119 a day (Maringanti, 2009). By March 2012 the Union was telling Parliament that judgment in a similar petition had been reserved, while the Karnataka High Court's ruling of 23 September 2011, that the programme wage may not fall below the State minimum, was being contested in the Supreme Court (Lok Sabha Unstarred Question 639, 2012). A final decision of the Andhra Pradesh High Court on the point could not be traced in the sources consulted.

On the Minimum Wages Act proper, the one Andhra Pradesh decision found in the digests consulted is B. Ramdas v. Authority under the Minimum Wages Act, Guntur Region, 1987 Lab IC 1493, which treated the claims authority as a quasi-judicial body bound to observe natural justice. Reported High Court decisions squarely on farm wages are few, and that scarcity is itself a finding. The weightiest pronouncements have come through public-interest petitions brought by unions and activists, seldom through claims by labourers acting alone. The doctrine is strong; the individual remedy is weak.

7. Critical Appraisal

7.1 Rights without records

Most of the protective law examined above presumes what the farm labourer lacks: an identifiable employer, a written engagement and a record of days **p5** worked and wages paid. The Code on Wages and the State Rules speak the language of establishments, registers and wage slips. Workers in the capital

region described being taken on by contractors while work lasted and sent away without notice or stated reason when it ended (Maganti, 2019), an arrangement that leaves no paper behind. The employment guarantee does better because the State is itself the paymaster and keeps the muster rolls, but it records only the days the programme provides. For the rest of the year the worker's proof of her own employment is her word against the employer's, and a claims authority that cannot act without evidence of employment has, in effect, no jurisdiction over the casual labourer. Kerala's Agricultural Workers Act, 1974 began from a statutory register of workers. So far as the sources consulted show, Andhra Pradesh has no comparable register, and e-Shram records the worker without recording the employer.

7.2 Wages and the guarantee

Wage protection is divided between authorities that work on different cycles. The Union notifies the guarantee wage, Rs 312 a day in Andhra Pradesh from July 2026, while the Commissioner of Labour revises the State minimum twice a year. Whether one stands above the other depends on zone and category, but the litigation of 2009 shows what can follow when they diverge: for a time workers on the public programme received Rs 80 a day when the State's minimum for farm work stood at about Rs 119 (Maringanti, 2009). The new Act adds risks of its own. A pause of up to sixty days, announced in advance to protect the supply of labour at peak season, also withdraws the guarantee wage as a reservation price just when private demand for labour is greatest. Because the State must meet 40 per cent of the cost, it has a fiscal reason to ration work. And a programme that depends on biometric authentication and geospatial monitoring places the burden of technical failure on the worker.

7.3 Caste, gender and risk

Wages are lowest where social power is steepest. At Tsundur the withdrawal of work was a caste sanction; the Atrocities Act can punish the act, slowly, but it cannot compel anyone to give employment. On gender, the Code on Wages forbids discrimination in pay, yet a 2019 field report put day wages in the delta villages of the capital region at Rs 400 to 500 for men and Rs 150 to 200 for women (Maganti, 2019). Change in land use also moves risk onto the labourer faster than law follows it. Villagers in the capital region told the same reporter that construction firms employ migrants from other States who accept lower wages, while local workers travel thirty to forty kilometres to cut chilli for fifty to seventy days in a year. Nor does any instrument reviewed here prescribe heat limits, spraying precautions or protective equipment for open-field work.

7.4 The missing statute

Beneath these particular gaps lies an architectural one. The law protects the farm worker through general instruments written for someone else, supplemented by schemes that can be revised by executive order. Nothing in the State's law gathers the labourer's rights, remedies and welfare benefits in one place, or gives her a forum within reach of the village.

8. Suggestions

The appraisal points to a reform agenda that works with the grain of existing law instead of adding another layer to it. Eight proposals follow.

1. **A State Agricultural Workers Act.** Enact Kerala model of 1974, providing a register of workers, a welfare fund and board financed by landowners, workers and the Government, and an accessible forum for wage and dispute claims. Entry 24 of the Concurrent List gives the State competence, and the statute should complement the Code on Wages rather than duplicate it, so as to avoid repugnancy under Article 254.

2. **Regular and legible wage revision.** Review basic rates, and not only the dearness allowance, at fixed intervals; fix crop-wise piece rates for transplanting, harvesting and picking; state the rate for men and women as one figure; and display the notified rate in Telugu at every Gram Panchayat.
3. **A mandal-level enforcement mechanism built on social audit.** Give each mandal a facilitation cell under the Inspector-cum-Facilitator and let village auditors on the SSAAT model verify farm-wage payments at public hearings, supported by a wage-complaint register kept at the Gram Panchayat.
4. **A State registry linked to e-Shram.** Record both the worker and the landholder or contractor who engages her, and attach accident, health, maternity and old-age cover to registration through the welfare fund.
5. **Legal aid and collective claims.** Place paralegals under the Legal Services Authorities Act, 1987 in labour-dense mandals, and encourage unions, whose right to organise Article 19(1)(c) protects, to bring the group claims that the Rules already permit.
6. **A livelihood package when land use changes.** The Right to basic Compensation and Land Acquisition, Rehabilitation, Resettlement Act, 2013 counts agricultural labourerss. A State rule should extend that principle to pooling schemes, aquaculture conversion and industrial allotment, with a defined pension, retraining and preference in local jobs.
7. **Heat and pesticide protocols.** Prescribe rest, water and shade in hot weather, and training, protective equipment and re-entry intervals for spraying, either under the State's rules made under the Occupational Safety, Health and Working Conditions Code or, where those do not reach open-field work, in the new statute.
8. **A periodic State survey.** Survey agricultural labour households every five years on wages, days of work, debt and migration, so that policy no longer rests on the Census of 2011.

None of these proposals needs a constitutional amendment; each draws on powers the State already holds.

9. Conclusion

The agricultural labourer in Andhra Pradesh is protected by more law than is generally supposed and by less than the Constitution promises. The constitutional text speaks plainly of work, wages and dignity for agricultural workers. The Supreme Court has read the minimum wage into Article 23 and livelihood and health into Article 21, and national statutes now offer a minimum wage, a guarantee of employment and remedies against bondage and caste atrocity. What is missing is not principle but connection. Wage law presumes an employer who keeps records, the employment guarantee can be paused or rationed, displacement by land-use change is met with a pension tied to one locality, and the labourer's most effective forum has been a public-interest petition brought on her behalf.

Dr. Ambedkar's test, whether law changes the daily bargain between the labourer and the landholder, is therefore not yet met. It can be met by a State statute that registers the worker, brings the wage claim within reach of the village, and builds on the social audit method that the State has already institutionalised.

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