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Export Promotion Mission: the Big Merge

- Ishani Burande

In November 2025, the cabinet approved the Export Promotion Mission. This comes at a time when global trade is facing mounting uncertainty, especially in the midst of a raging tariff war. Geopolitical tensions are disrupting supply chains with a rising trend of protectionism, and consequently, there has been a decline in global demand along with an increasing pressure on domestic manufacturing. Therefore at this juncture, export growth has become difficult but remains necessary.

The Export Promotion Mission brings a necessary policy shift against this backdrop. One that seeks to move India towards a more strategic, export-led growth model rather than a model that is merely reactive to the ongoing changes. This initiative is ambitious in scope with its financial commitment of more than Rs. 25,060 crores over a five year period. However, its true success lies in implementation, ensuring that the intent is translated into an effective outcome.

TThis Export Promotion Mission primarily aims to support micro, small and medium enterprises (MSMEs) who are recognised as the backbone of India's manufacturing and employment sector. Despite their invaluable contribution to the economy, they have, for a very long time, been underrepresented in India's export landscape. This mission aims to address this gap by promising affordable trade finance, improved access to export credit and systematic capacity building. These measures are significant as these small enterprises have often been prevented from competing in the global market due to the lack of finance, high borrowing costs, and limited technical know-how.

This mission signals that export promotion is no longer looked at as a short-term policy, but rather as a sustained priority. By spreading the expenditure over five years, there is space for continuity, monitoring progress and correcting where necessary. However, while financial support remains extremely necessary, it is not sufficient for the successful implementation of the mission. Past trends in such missions have indicated that until the financial support reaches the intended beneficiaries with minimal procedural obstacles, the impact of such schemes remains uneven.

One of the primary strengths of this initiative is that, rather than relying on broad incentives, the policy focuses directly on sectors with high export potential. This showcases an understanding of what is valued globally and the advantage that India holds comparatively. However, excessive focus on capital-intensive and technology-related industries may lead to neglect or come at the cost of the traditional, labour-intensive sectors such as those of textiles, gems and jewellery, which continue to be a massive source of employment. Export strategy must be such which balances growth while catering to the existing realities.

Moreover, many MSMEs operate without any institutional support system and hence, the mission risks being beneficial only to a small segment of 'well-connected' enterprises. This means that the strategy may

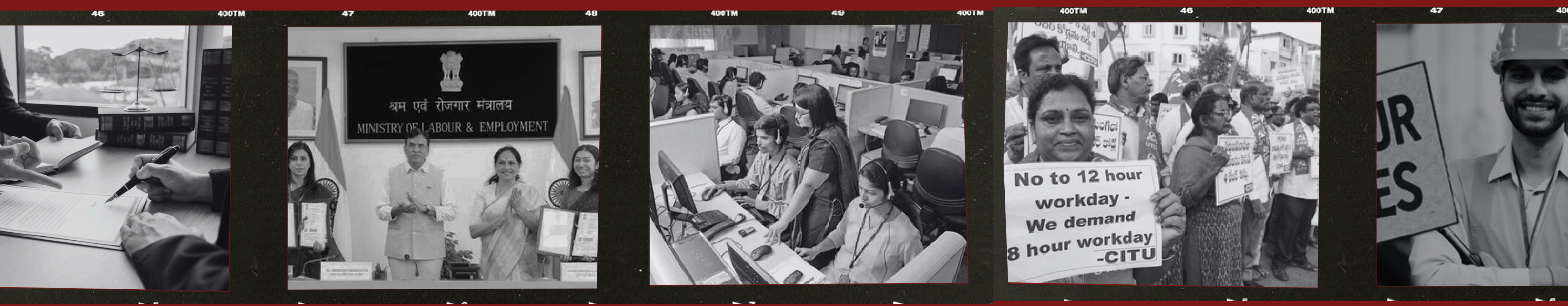
Market diversification is key to the policy as India's current exports are limited to the United States and the European Union. This policy helps in pushing India's trade towards bilateral and regional trade agreements with Africa, Latin America and the ASEAN. The mission however, needs to prioritise awareness and effective guidance amongst exporters because India's experience with the existing free trade agreements highlights the problem of low utilisation by the exporters due to the lack of awareness.

The mission emphasises sustainability and global compliance standards. This showcases a long term commitment and awareness of the future realities. Currently, environmental, social, and governance (ESG) norms are shaping international trade. Aligning the Indian exports with these parameters is therefore essential.

The Export Promotion Mission is timely, well-intentioned and supported by significant investment. Yet, its successful execution depends on whether these benefits reach the MSMEs, logistics improve, and institutions work in coordination. This mission could mark a decisive step in India's transition from a reactive exporter to a strategic exporter. The mission is ambitious, but its final test lies in its consistency and execution.

Out with the Old, In with the New: Revamping of the Labour Laws

-Shreya Mathur



Introduction

Effective from 21 November 2025, the government announced the implementation of the four labor Codes, revamping and consolidating the existing framework that had been spread across 29 acts. The new laws aim to extend benefits to all classes of employees, providing better job security while providing for a more effective penalty system to ensure compliance. From recognizing gig and platform workers to extending health and post-retirement benefits, the Codes align with the emerging trends and cover all job profiles.

The four new Codes introduced are, the Code on Wages, 2019; the Industrial Relations Code, 2020; the Code on Social Security, 2020 and the Occupational Safety, Health and Working Conditions Code, 2020. The government aims to operationalize the Codes from 1 April 2026. To the effect, they shall soon be releasing the draft allied rules for public comments, to have them ready in time. This article provides an overview of the new codes and explores the major changes introduced therein.

Code on Wages, 2019

The Code on Wages, 2019 is an amalgamation of four laws. The changes introduced herein ensure that workers are adequately compensated for their work and have the protection of the law. The Code strives for increasing the standards of living, promoting equality and inclusivity and ensuring justice in the workplace.

Some of the major changes introduced include, the introduction of a floor wage which will serve as the base line for industries to set up minimum wage for their factories.

The Code also removes the previous classification of jobs as scheduled employment. Now all employees shall enjoy the benefit of a set minimum wage. Both organized and unorganized workers are now protected under the Code.

In addition, the Code read with the rules, has specified the maximum number of working hours for all employees. Employees can now only work for a maximum of 48 hours in a work week and for not more than 12 hours a day, including intervals for rest. Every employee shall necessarily be provided with a paid rest day in every period of seven days.

Any hours put in over the time limit shall be compensated by the employer by providing wages not less than twice the normal rate of wages. If an employee works on a rest day, they shall be paid wages not less than the overtime rate. The Code also provides for the payment of bonus if an employee has worked for at least 30 days in an accounting year.

It provides for timely payment of wages and specifies the time-period for their disbursement. This must be accompanied with the issuing of a wage slip to act as documentary proof. The code calls for equal remuneration for same work and bars discrimination on the basis of gender of the individual.

The limitation period for filing of claims against an employer has also been extended to three years providing employees with sufficient time to collect proof and garner necessary support.

Industrial Relations Code, 2020

The Industrial Relations Code, 2020 replaces three acts and aims to promote ease of doing business, easing compliance requirements for employers, especially small business owners. It streamlines dispute resolution processes and also aims to protect worker rights.

The code expands the definitions of workers and industry such that more workers now come under the umbrella of protection. It also provides legal recognition to registered trade unions as the sole negotiating union if they represent at least 51% of the workers. In case of multiple registered unions, if they do not have this majority, but represent at least 20% workers, they shall be termed as negotiating councils who shall send their representatives for negotiation.

In addition, restrictions have been placed on strikes and lock-outs with workers and employers now being required to give a notice of sixty days. In addition, no strikes or lock-outs may occur within fourteen days of notice. Restriction has also been placed on strikes and lock-outs during pendency of conciliation, tribunal or arbitral proceedings.

The Code raises the threshold for need for approval from the government for mass lay-offs, retrenchment or closure from 100 to 300 workers. The threshold has similarly been increased for the requirement of making standing orders by establishments from 100 to 300 workers.

The Code also replaces imprisonment periods for offences under the repealed Acts with mere fine payments. The offences additionally can now be compounded, allowing for a pathway to avoid needless litigation and settlement of disputes.

Code on Social Security, 2020

The Code of Social Security, 2020 encompasses nine laws within it and aims to better employee protection and ease employer compliance.

The Code begins its changes by introducing new categories of workers and providing recognition to gig and platform workers as well as work from home set-ups. Protection is extended to workers in all sectors, organized and unorganized.

The Code calls for the formation of boards and setting up of funds for social security schemes to be implemented for the benefit of gig, platform and unorganized workers. It also extends the benefits of Employees' State Insurance Corporation ('ESIC') to cover them. In addition, scheme formation shall also take place for those who are self-employed.

ESIC has been revamped as well. The medical professionals employed therein shall be given compensation aligned with AIIMS standards. New streams of revenue have been created by classifying charges collected from non-insured beneficiaries and the corporate social responsibility fund as formal sources of income.

Employers have been granted certain benefits as well such as requirement of single electronic registration for all social security benefits. In addition, the government can now defer or reduce employer contribution in times of calamity or pandemic.

Employees can now job hop easily without worrying about their provident funds. A provision for their transferability has been put in place. In case of non-transferability, the employee may either withdraw the account or keep it inactive till securing covered employment.

Occupational Safety, Health and Working Conditions Code, 2020

The Occupational Safety, Health and Working Conditions Code, 2020 consolidates 13 laws. It focuses on worker safety, easier compliance and speedy dispute resolution.

The Code has introduced the requirement of mandatory prescription of appointment letters specifying details of the employee and conditions of employment. This is a step towards formalization and increased transparency.

The Code specifies that the maximum working hours for an employee per week shall be 48 hours. A cap is placed on the number of hours an employee can work in a day based on how many days are present in the work week. It also specifies that annual leave shall be granted to employees if they work for 180 days or more in a calendar year, reducing the requirement from 240 days.

Focus has been placed on health, safety and welfare of the workers as well. Organizations crossing the prescribed thresholds of workers shall be obligated to form safety committees. There shall also be universal implementation, across all sectors of health, safety and welfare standards for workers. In addition, employers are liable to provide free annual health check-ups to their employees depending on the age threshold to be specified by the government.

The Code aims to build a national worker database for unorganized workers, especially migrant workers. This shall help in better disbursement of social security benefits as well as help in provision of jobs and mapping of skills.

Women are now explicitly allowed to work night shifts, subject to their consent and safety arrangements, and are entitled to work in all establishments for all kinds of work. To boost women's participation further, establishments with 50 or more workers have to arrange for a creche facility for children under the age of 6.

Promoting ease of doing business, the law now streamlines compliance and requires only single registration, single returns and single all India licenses as well as provides for deemed approvals in many cases. The threshold of strength of workers for requirement of license for factories as well as applicability of contract labour laws has been increased. The Code also provides for compounding of offences, which makes it more employer-friendly.

Backlash

The new Codes have sparked protests across the nation, since the workers allege that the recognition of gig and platform workers, provision of uniform rights to all employees regardless of gender or occupation, etc. are namesake developments in the face of larger loopholes meant for the employers to exploit.

The main contentions raised include increasing the threshold for requirement of government approval for mass lay-offs in factories from 100 to 300. In addition, the permissible limit for factory shift durations has been increased. Unionisation has also been regulated into and the right to strike seriously restricted with the provision for look-out notices and increased notice-period mandate for the same. Moreover, the Codes have been alleged to parade itself into being revolutionary, since it only provides the skeleton with the underlying rules still pending to be notified.

Conclusion

The new labour Codes bring in reforms and changes aligning with the rapidly changing landscape of the market. From promoting ease of doing business, to protecting and promoting worker rights, the codes cover them all. But there has been severe backlash post its implementation. Trade unions have taken to the streets, calling the codes an invitation for employers to gain even more control over their employees under the garb of strengthening worker rights and promoting inclusivity and equality. The workers now look to the government for respite. While they have been granted a plethora of new rights, the loopholes still seem too wide to work beside.

Digital Personal Data Protection Rules, 2025

-Nidhi Rai

Introduction

The Ministry of Electronics and Information Technology notified the Digital Personal Data Protection (DPDP) Rules, 2025, on November 14, 2025. After extensive discussions and public consultations, the rules have finally been put in place. They aim to outline the responsibilities of data fiduciaries, consent managers, and the newly established Data Protection Board of India, ensuring that the core principles of the Act are effectively implemented in practice.

Background

The Digital Personal Data Protection Act, 2023 establishes a framework for regulating and processing digital personal data. It recognises individuals as data principals and the entities processing the data as data fiduciaries. The Act aims to protect personal data while also ensuring lawful use of the same in today's interconnected digital economy. However, a number of provisions of the Act regarding consent standards, notice requirements, grievance redressal, and enforcement procedures lack operational details and are principle-based. The DPDP Rules, 2025 set to address these gaps and lay the requirements for valid consent, rights of data principals, mechanisms for reporting data breaches while also operationalising the Data Protection Board of India (DPBI).

Key Provisions and Compliance Timeline

The key provisions can be categorised as follows:

- Notice and Consent (Rule 3 and 4)- It is mandatory for data fiduciaries to give notice which must be understandable and available in English and the 22 scheduled languages. Moreover, they are obligated to give an itemized list of data collected along with its use. Clear instructions on withdrawal of consent, exercising erasure and correction rights and grievance redressal must be included in the notice. The Rules have also introduced consent managers acting as the middleman between the data principals and data fiduciaries. These platforms will enable individuals to review, manage and withdraw their consent.

- Data Breach (Rule7)- In cases of data breach, the fiduciary must report it to the Data Protection Board (DPBI) within 72 hours. Additionally, the impacted users are to be informed detailing the nature of the breach along with remedial measures they are to take.

- Protection of Minors (Rule 10-12)- It is mandatory for fiduciaries to acquire verifiable parental consent for processing data of individuals under 18. Platforms like Digilocker may be used to verify parents' age and identity. Behavioral tracking and targeted advertisements directed at children are prohibited by the Rules.

- Data Retention and Erasure (Rule 8)- Personal data must be erased by the fiduciary once it has served its purpose unless its retention is mandated by law. For large platforms like social media and e-commerce sites, data must be erased after 3 years of inactivity, after notifying the user about the same 48 hours prior to erasure.

- Rights and Redressal (Rule 14): Data principals have the right to access, correct and erase their data and can also nominate a representative in cases of death or incapacity. The grievances must be resolved within 90 days.

- Significant Data Fiduciaries (SDFs)- The government shall designate Significant Data Fiduciaries based on volume and sensitivity of personal data processed. SDFs are bound by stricter obligations, they must appoint an India based Data Protection Officer (DPO), conduct annual independent audits and perform Data Protection Impact Assessments (DPIAs).

The DPDP Rules come into effect in 3 phases stretching to about 18 months to ensure full compliance giving adequate time to fiduciaries to rework their current structure and avoid compliance burden. Phase 1 takes immediate effect i.e., 13 November onwards and focuses on formal establishment of the Data Protection Board (DPBI) and finalising basic legal definitions and penalties. Phase 2 concluding in November of 2026 focuses on consent manager framework requiring registration of such entities. Finally, Phase 3 concludes in May of 2027 and focuses on full compliance of all core features including data erasure rights, minor user data protection and other principal rights.

Implications and Analysis

The DPDP Rules, 2025 create a rights-based regime that replaces the previously unregulated data environment in India. The Rules pose various operational, economic, and technical implications as data privacy has become a top priority. However, their success largely depends on compliance and enforcement efficiency. The three phased 18-month compliance timeline provides fiduciaries with much needed breathing room to redesign consent and breach reporting mechanisms but it also delays enforcement, making many protections not immediately enforceable which may lead to weaker accountability in the interim period as entities face limited consequences for non-compliance during the transition period.

The existing data management system needs complete redesign in order to meet the new requirements and fiduciaries will need to focus on re-engineering their current models. These changes present challenges for MSMEs and startups as they are resource intensive and require automation of consent management, data retention, and breach-response processes. Enforcement capacity is another concern, successful compliance depends on the Data Protection Board of India, lacking an operational track record. Capacity building and transparency should be prioritised before granting it broad powers. The 2023 Act empowers the DPBI to impose civil penalties up to INR 250 crore for serious breaches, highlighting data protection as a key government priority.

Conclusion

TThe DPDP Rules 2025 provide a practical framework to enforce the 2023 Act, with a phased approach balancing data protection and fiduciary needs. However, challenges such as compliance costs and uncertainty over the DPBI's efficiency remain. Effective implementation will require strong institutional support, ongoing refinement, and stakeholder adaptation

The UGC (Promotion of Equity in Higher Education Institutions) Regulations, 2026: Inclusion, Contestation, and Institutional Responsibility

-Reyansh Thakur

Recently, the University Grants Commission notified the University Grants Commission (Promotion of Equity in Higher Education Institutions) Regulations, 2026, introducing a comprehensive regulatory framework aimed at addressing caste-based discrimination within India's higher education system. These Regulations replace the earlier 2012 guidelines and represent a shift from advisory norms to a binding, enforceable regime applicable to all higher education institutions, including central, state, private, and deemed universities. The stated objective of the framework is to promote equity, dignity, and non-discrimination, and to create institutional mechanisms capable of responding to structural and individual forms of exclusion on campuses.

A defining feature of the 2026 Regulations is the formal institutionalisation of equity-oriented structures within higher education institutions. Universities are now mandatorily required to establish Equal Opportunity Centres, Equity Committees, and round-the-clock grievance redressal mechanisms, including online portals and helplines. These bodies are entrusted with both preventive and remedial functions, ranging from sensitisation initiatives to the inquiry and resolution of discrimination complaints. Notably, institutional heads are held personally responsible for ensuring compliance, and failure to adhere to the Regulations may invite serious consequences, including withdrawal of UGC recognition or access to funding schemes. This emphasis on accountability distinguishes the new framework from earlier approaches, which relied largely on internal committees with limited enforcement capacity.

Another significant development lies in the scope of protection envisaged under the Regulations. While earlier frameworks primarily focused on Scheduled Castes and Scheduled Tribes, the 2026 Regulations explicitly extend coverage to Other Backward Classes, persons with disabilities, and other socially disadvantaged groups. Discrimination is defined in broad terms to include direct, indirect, and structural forms of exclusion, thereby recognising that caste-based bias may manifest not only through overt acts but also through institutional practices and informal power relations. This expansion reflects the UGC's stated response to a reported rise in discrimination complaints across campuses in recent years and an acknowledgment of the complex ways in which caste operates within academic spaces.

Despite these objectives, the Regulations have generated significant public debate and student-led protest, particularly around questions of neutrality and procedural fairness. A central point of contention concerns the manner in which caste-based discrimination is conceptualised. Critics argue that by framing caste discrimination primarily in relation to historically disadvantaged groups, the Regulations risk creating a perception that individuals from the unreserved or "general" category fall outside the ambit of protection. This has led to concerns that the framework implicitly assumes a fixed victim-perpetrator dynamic based on caste identity, rather than addressing discrimination as a contextual and relational phenomenon. For some student groups, this raises apprehensions about unequal treatment and institutional bias.

Closely linked to this concern are debates surrounding procedural safeguards and due process. While the Regulations mandate swift inquiry timelines and prioritise complainant confidentiality, they do not explicitly articulate safeguards against frivolous or malicious complaints. Nor do they comprehensively outline protections for the accused during the pendency of proceedings. Critics argue that the absence of clear procedural checks may undermine principles of natural justice, particularly in academic environments where reputational harm can have lasting professional and personal consequences. Supporters of the framework, however, contend that over-emphasising false complaints risks delegitimising genuine grievances and discouraging victims from reporting discrimination.

Further apprehensions have been expressed regarding the implementation mechanisms proposed under the Regulations, such as Equity Squads and Equity Ambassadors. Although intended to proactively monitor campus environments and foster inclusivity, these measures have been viewed by some as excessive administrative intervention, potentially encroaching upon institutional autonomy and academic freedom. The concern is not with the objective of equity itself, but with the possibility that continuous monitoring may create a climate of suspicion rather than constructive dialogue.

The controversy surrounding the 2026 Regulations must also be situated within India's broader socio-legal history of caste-based affirmative action and educational reform. Policies aimed at addressing caste inequality—particularly reservations in education and employment—have consistently generated intense public debate, legal challenges, and political mobilisation. The current response to the UGC's equity framework reflects this historical pattern, where efforts to correct structural disadvantages are often accompanied by competing claims of fairness, merit, and equality.

At the same time, proponents of the Regulations argue that caste discrimination in higher education remains a documented and persistent reality, undermining both access to education and the constitutional promise of equality. From this perspective, the Regulations are viewed as a necessary institutional response to long-standing failures in addressing discrimination through informal or ad hoc measures. By standardising grievance mechanisms and attaching enforceable consequences to non-compliance, the UGC seeks to embed equity within the governance of higher education rather than treating it as a peripheral concern.

In conclusion, the *UGC (Promotion of Equity in Higher Education Institutions) Regulations, 2026* represent a significant recalibration of how caste-based discrimination is addressed within Indian higher education. While the framework marks a decisive move toward institutional accountability and inclusion, it has simultaneously raised complex questions relating to neutrality, due process, and the limits of regulatory intervention. The ongoing debate underscores the challenge of designing equity-oriented policies that are both socially responsive and procedurally balanced, particularly within a deeply stratified social context.

The IndiGo Crisis: Understanding the Challenges in Implementing Aviation Safety Regulations

-Sanjushree Sur

Introduction

In early December 2025, IndiGo, India's biggest airline, experienced massive operational disruptions resulting from its failure to balance its public flight schedule with the newly enforced FDTL (Flight Duty Time Limitation) norms. With several hundred flights either delayed or cancelled in the first week, with over 400 cancellations on December 5th alone, the IndiGo crisis left thousands of passengers stranded all over the country.

However, what is interesting to note here is that, despite the airline having a two-year window to prepare for implementation of the revised norms, IndiGo made no conscious effort to increase its rate of hiring, or reduce the number of flights scheduled, or undertake any other measures aimed at averting the crisis.

Understanding the FDTL Norms

In response to several studies identifying fatigue-induced cognitive and physical limitations as the leading cause of aviation accidents, India revised its FDTL norms in alignment with the best global practices. These safety norms are a part of the Civil Aviation Requirements (CARs) that prescribe how long pilots can fly, the minimum duration of rest they must avail, and restrict the number of night operations they can perform to prevent accidents resulting from fatigue, especially during late-night and early-morning operations. The revised norms brought about several changes, such as increasing the mandatory weekly rest for pilots from 36 to 48 hours, limiting night landings to 2 per week, and mandating fatigue reporting by airlines to the regulator. The implementation was conducted in two distinct phases, one in July and the other in November.

Key Challenges to Implementation

Although the Ministry of Civil Aviation announced the enforcement timeline in January 2024, IndiGo, unlike all other airlines, failed to align its rostering and duty schedules with the specified timeline. To make matters worse, instead of enforcing strict compliance measures, the Ministry of Civil Aviation granted temporary relaxations of key safety provisions to its fleet. The Directorate General of Civil Aviation (DGCA) modified the definition of night duty, permitted an increase in weekly night landings from two to four, and extended the validity of these exemptions until February 2026.

The selective enforcement of the safety norms sparked significant opposition from the Airline Pilots' Association of India (ALPA India), which accused the government of granting selective exemptions prioritising profitability over safety. The consequences of this fallout had far-reaching effects on all stakeholders across the aviation industry.

- For pilots, the relaxation of night-duty policies reinforced the perception of safety considerations being subordinate to operational convenience and profitability;
- Passengers lost confidence in the ability of institutions to ensure public safety after the large-scale cancellations and delays; and
- Critics started raising concerns of under-investment in pilot recruitment, thereby defeating the very purpose of the revised norms.

These enforcement failures illustrate the deeper structural irregularities in India's governance framework. For instance, the DGCA's inability to implement the safety norms without ministerial intervention reveals its lack of functional autonomy as a watchdog of aviation safety. This, however, is not an isolated event. In 2007-08, fatigue-related Civil Aviation Requirements were introduced, only to be suspended following airline protests. Initially, courts condemned the suspension, but the lack of affirmative action to back this condemnation created a precedent suggesting that safety regulations could be compromised under commercial pressure. It can be argued that such instances have normalised regulatory inconsistencies, promoting a culture of post hoc relaxations, explaining IndiGo's lack of planning and contingency measures.

Although the DGCA imposed a penalty of 22 crores on the airline after a detailed inquiry into its cancellations and delays in January 2026, the fine coexists with the regulatory relaxations granted by the ministry. Furthermore, it was only imposed after more than 3 lakh passengers had already borne the brunt of such gross negligence, indicating the ministry's lack of regulatory assertiveness.

Recommendations

To prevent the recurrence of a similar crisis in the near future, the aviation industry must incorporate a set of corrective measures focused on improving compliance, including but not limited to:

- Strict and uniform enforcement of FDTL norms;
- Implementation of the ICAO (International Civil Aviation Organisation) recommendations to establish an independent aviation safety authority;
- Mandating airlines to demonstrate adequate pilot strength before approval of scheduled flights;
- Introducing clear accountability mechanisms, such as regulatory penalties for non-compliance without selective relaxations;
- Establishing a passenger-centric compensation framework to address financial losses to recognise the broader costs imposed on travellers; and
- Limiting regulatory relaxations to instances of absolute necessity, and that too for a brief period.

Conclusion

The IndiGo crisis was not simply a consequence of managerial miscalculations but a result of a fatally flawed regulatory framework that has time and again prioritised profitability over safety. Despite scientific evidence linking pilot fatigue to aviation accidents, the inconsistent application of the FDTL requirements and the subsequent imposition of a fine, while doing little to address the underlying structural shortcomings, highlights India's tendency to intervene post crisis, rather than enforcing safeguards to prevent it in the first place.

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